BD supplier materials of concern guidance

This document contains guidance on how to access and complete

BD requests as well as providing details of the BD sustainability strategy

and information on regulations and requirements.



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BD Supply Base Compliance Email: <u>bd_moc@bd.com</u> bd.com/sustainability

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I. SustainHub (material compliance platform)—Guidance for suppliers

Evolving global environmental regulations and increasing customer demands have made understanding the composition of all materials and products a top priority for BD. For this reason we are gathering data on substances that have or are suspected to have negative impact on human health and/or the environment and can pose risks under particular conditions. To learn more about BD Sustainability policy, please review our Sustainability Report by clicking: BD Sustainability Report

The iPoint SustainHub is a web application that is used by BD for data collection. It is also a communication tool between BD and its suppliers. Communication with suppliers is initiated by the BD Supply Base Compliance Team sending an email with an invitation to the SustainHub portal. The supplier will create an account or use the registration key to access the BD request in SustainHub. Further communication between BD and suppliers can be conducted using: bd_moc@bd.com.

Receiving the email

As a BD supplier you shall receive an email from bd_moc@bd.com that will contain:

- A link to the SustainHub portal.
- Registration key—when you already have an account in SustainHub portal use the registration key to enter the portal.

After registration you will receive an additional email from bd_moc@bd.com that contains:

- A list of pending product requests (product number, product name).
- Due date.
- Regulations for compliance check.

First time login

Step 1: In the initial email message you will receive a link to the SustainHub. To enter the portal, click on the link.

https://sustainhub.ipoint-systems.com

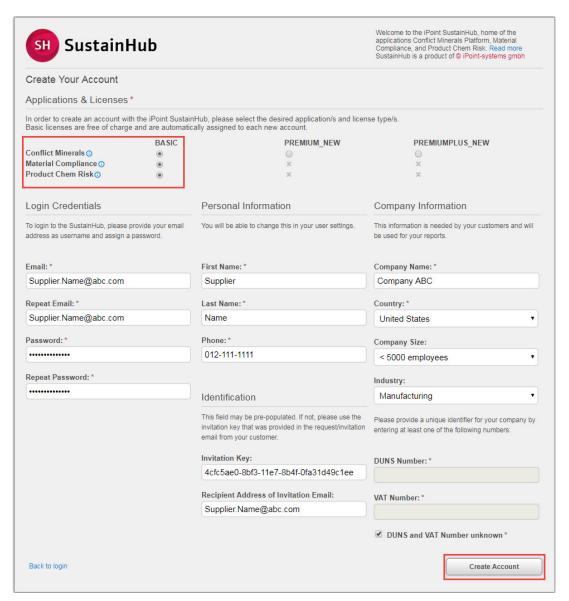
NOTE: If you are not the right person to answer the request, forward the registration email to the correct person. The next steps should be performed by an appropriate person within your company.

Step 2: You will be asked to verify your email address and set a password. Since this is the registration, you will be asked to verify your contact information by providing details such as your first and last name, phone number, company name and country as shown in the screenshot below. Once you have it completed, click the 'Create Account' button.

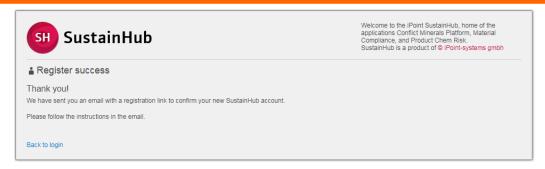
NOTE: All fields with a red asterisk are required.

NOTE: In order to be able to complete BD requests, the BASIC type of license is required. A BASIC license is free of charge.

NOTE: If you have been forwarded invitation email please change email address in field 'Email' to yours. Do not make changes to fields: 'Invitation Key' nor 'Recipient Address of Invitation Key'. Next time you will login to SustainHub you will be able to use your email as user login.



Step 3: After you have registered successfully, the 'Register success' window will pop up as shown in the screenshot below. Subsequently, you will receive an email confirming successful registration. In that email, click on the 'Complete registration' link to login to the SustainHub portal.



NOTE: This is second step of registration. If you do not receive second email after some time please open ticket via https://ipoint.typeform.com/to/HXORxv with you details. iPoint specialist will help your to complete registration.

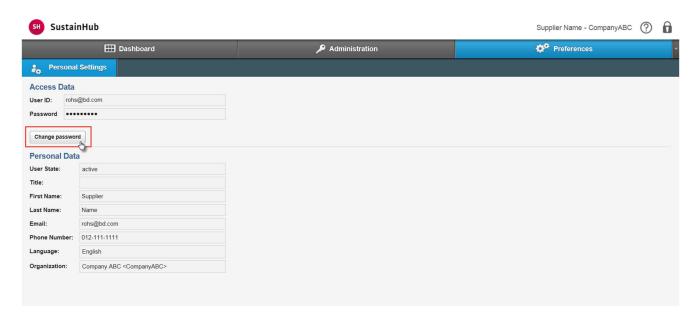
Step 4: On the login page you will be asked to enter your email address and newly set password. Once you have it completed, click the 'Login' button.



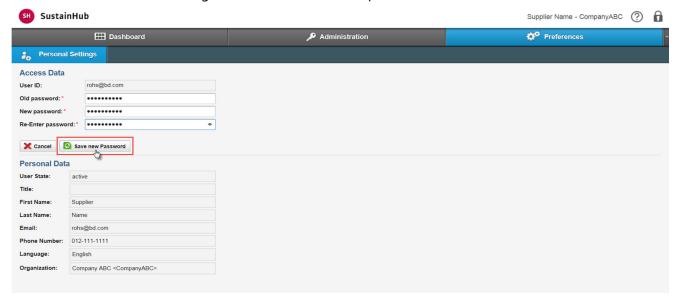
Password change

Step 1: After logging in to the SustainHub, go to the 'Preferences' bookmark as shown in the screenshot below.

Step 2: Click the 'Change password' button.



Step 3: You will then be asked to enter your old password and create a new one as shown in the screenshot below. After doing this click the 'Save new password' button.



Technical support

If you encounter any technical problems while using the SustainHub, please contact our Technical Support via the link below.

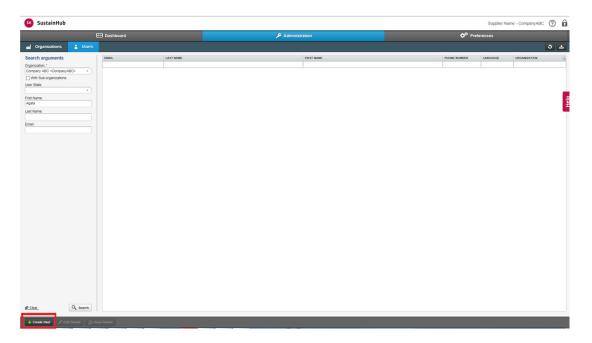
https://ipoint.typeform.com/to/HXORxv

How to assign your request to another person in your company

Step 1: If you are the first person who registered in your company, you will automatically receive an administrator role. You can choose another person from your company and assign the request to them. To do so, go to the 'Administration' bookmark as shown in the screenshot below. Then choose the 'Users' tab.

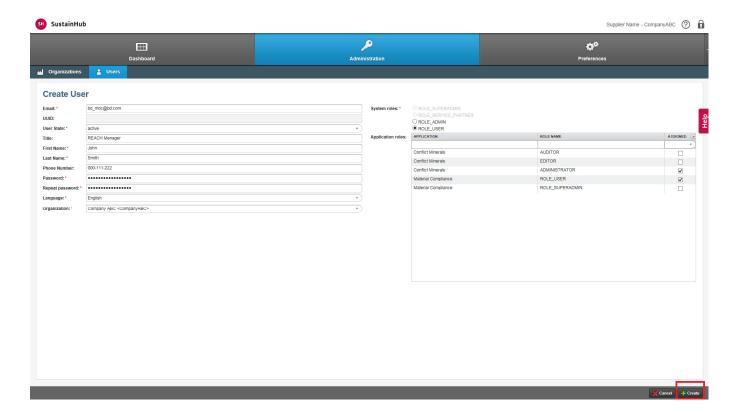


Step 2: Click the 'Create User' button at the bottom of the page.



Step 3: You will be asked to provide your coworker's email address, first and last name, set a password for him/her and choose the organization (only if you are an administrator for more than one organization). You should also assign system roles. For our requests, user role (ROLE_USER) will be sufficient. Once you have it completed, click the 'Create' button.

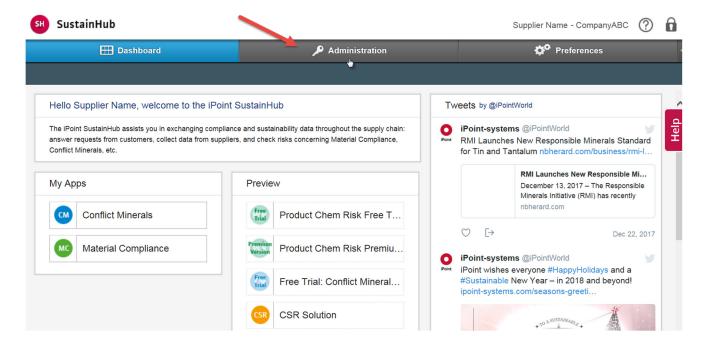
NOTE: All fields with a red asterisk are required.



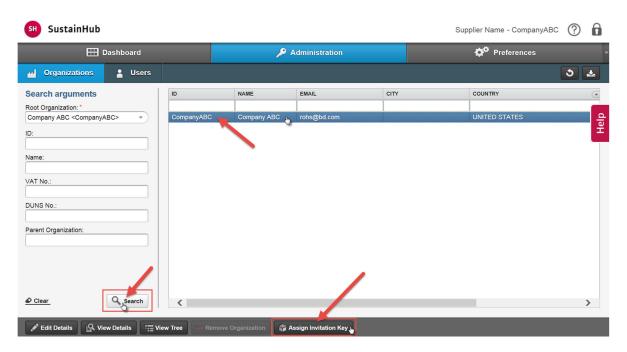
How to assign Invitation Key

There might be a situation where the BD request was initially sent to another person within your company. This request may not be visible for you once you log in to SustainHub. In this case, please perform the tasks described in this section. If you still cannot see the BD request, please contact the BD SBC team for support at bd_moc@bd.com.

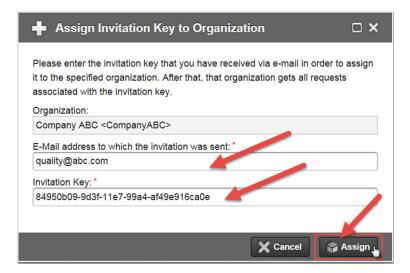
Step 1: Go to the 'Administration' bookmark, as shown below.



Step 2: When your root organization is selected, click the 'Search' button. Then click your company name in the window on the right side and the 'Assign Invitation Key' button, as shown below.

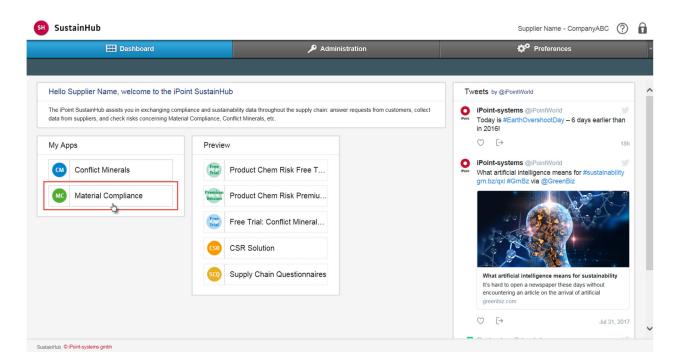


Step 3: When new window pops up, enter the email address to which the invitation was sent and the Invitation Key that you received, as shown below. Now requests should be visible for you. You can go to the Material Compliance platform and click the 'Request' tab.



How to reply to an MOC request

Step1: In the 'Dashboard' bookmark, click the 'Material Compliance' button as shown in the screenshot below. When you click the 'Conflict Minerals' button you will enter the CM portal. Details about this section are included in the Conflict Minerals instructions. The CM instruction can be found at: bd.com/sustainability -> view corporate policies and resources for suppliers -> supplier resources.

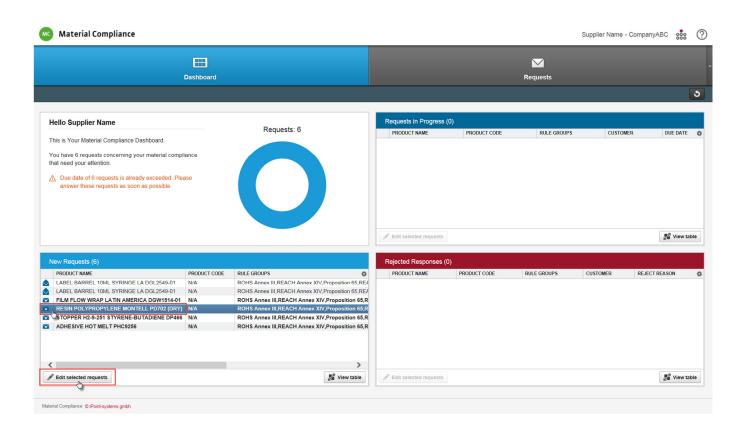


The Dashboard contains an overview of your material compliance requests. There you see three sections with different request types:

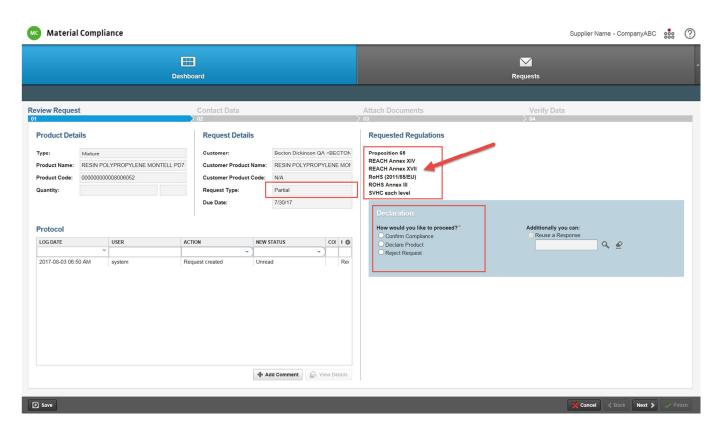
- Requests in progress
- New requests
- Rejected responses

All of these request types are editable.

Step 2: In the New requests section you can use the scroll option to see an origin of the request. Name of the company that sent you the request can be found in the 'Customer' column. Click an item you want to update as shown below.



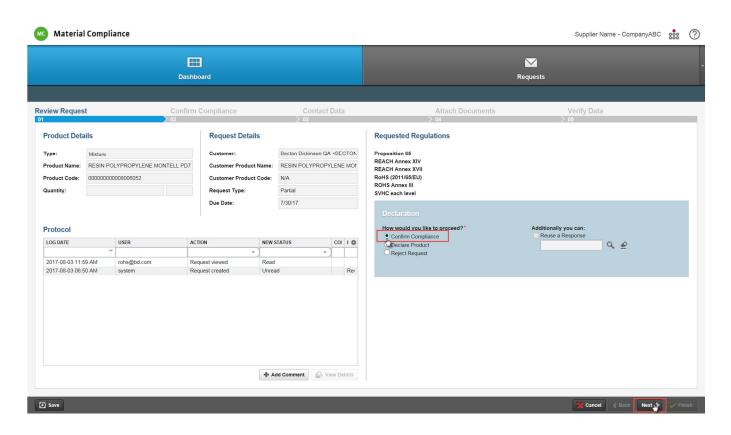
You will be redirected to the Review Request tab where you will find product and request details on the left side and a list of requested regulations on the right side. In the Declaration field you will have three response options to choose from. You can confirm compliance of your product in relation to the requested regulations by selecting the 'Confirm Compliance' radio button or report substances present in your product by selecting the 'Declare Product' radio button. There is also an option to reject the request if applicable. Please see the screenshot below.



NOTE: Partial request type means that you do not have to provide BD with the entire composition of your product. By choosing the 'Confirm Compliance' option you agree to provide information on all requested regulations, otherwise the system will not let you complete the request.

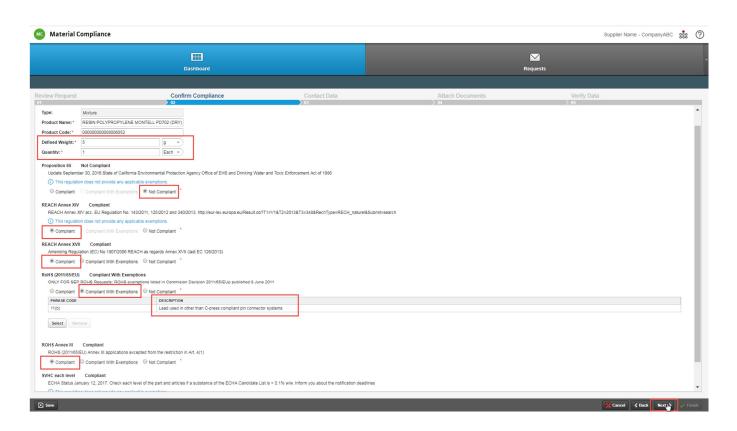
Confirm compliance

Step 1: If you want to confirm the compliance of your product with requested regulation instead of enclosing the product composition, click the 'Confirm Compliance' radio button and the 'Next' button to continue as shown below.



Step 2: Fill in all fields marked with a red asterisk and choose the correct unit of measure in the 'Defined weight' and 'Quantity' fields. At the requested regulations click the 'Compliant' or the 'Not Compliant' radio button accordingly. You can also report compliance with exemptions by selecting the 'Compliant with Exemptions' radio button and choosing the appropriate exemption. Once you have selected your answer, click the 'Next' button to continue. Please see screenshot below.

NOTE: BD is required to comply with a variety of regulations. As our valued supplier you may be requested to provide information on multiple regulations (MOC, California Proposition 65, RoHS etc.). All regulations relating to your product will be listed under the Confirm Compliance tab.



When the 'Compliant With Exemptions' radio button and appropriate exemption for RoHS is selected, remember to click the 'Apply' button as shown below.

Exemptions for RoHS (2011/65/EU)

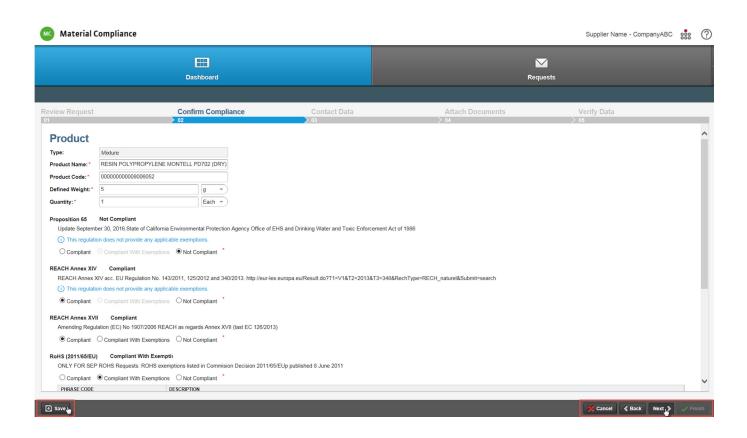


PHRASE CODE	DESCRIPTION	
2(a)(1)	Mercury in double-capped linear fluorescent lamps for generation lighting purposes not exceeding (per lamp):Tri	_
2(0)(1)	Lead in PZT based dielectric ceramic materials for capacitors which are part of integrated circuits or discrete ser	î
	Used spare parts for EEE: Lead used in other than C-press compliant pin connector systems	
	Lead in counterweights -others	
11(b)	Lead used in other than C-press compliant pin connector systems	
2(b)(4)	Mercury in other fluorescent lamps not exceeding (per lamp):Lamps for other general lighting and special purpos	
4(e)	Mercury in metal halide lamps (MH)	
4(b)-l	Mercury in High Pressure Sodium (vapour) lamps for general lighting purposes not exceeding (per burner) in lan	
16	Lead in linear incandescent lamps with silicate coated tubes	
1(c)	Mercury in single capped (compact) fluorescent lamps not exceeding (per burner):For general lighting purposes	
	Mercury in detectors for ionising radiation	
8(b)	Cadmium and its compounds in electrical contacts	
2(a)(5)	Mercury in double-capped linear fluorescent lamps for generation lighting purposes not exceeding (per lamp):Tri	
8(a)	Cadmium and its compounds in one shot pellet type thermal cut-offs	
3(a)	Mercury in cold cathode fluorescent lamps and external electrode fluorescent lamps (CCFL and EEFL) for speci	
	Mercury in very high accuracy capacitance and loss measurement bridges and in high frequency RF swotches a	
1(f)	Mercury in single capped (compact) fluorescent lamps not exceeding (per burner):For special purposes: 5 mg	
	Cadmium in helium-cadmium lasers - others	
	Lead bearings in X-ray tubes	
4(c)-I	Mercury in High Pressure Sodium (vapour) lamps for general lighting purposes not exceeding (per burner): P les	
2(b)(3)	Mercury in other fluorescent lamps not exceeding (per lamp): Non-linear tri-band phosphor lamps with tube diam	
	Cadmium in infra-red light detectors	*



NOTE: You can save completed information at anytime by clicking the 'Save' button. If you save, the information will be visible the next time you enter the portal. You can also go back to the previous step using the 'Back' navigation button as shown below.

NOTE: If the exemption you are looking for is not available in the list, please contact iPoint via their Service Desk at <u>ipoint-systems.com/service-desk/sustainhub/material-compliance-app/</u> or contact the BD Supply Base Compliance Team at <u>bd_moc@bd.com</u>.



Contact data

Step 3: In the 'Contact Data' tab you will be able to enter contact information for a product. An 'Authorizer' can be another person within your company who can be contacted in case of additional questions. If you are the only point of contact for compliance related inquiries, populate the Authorizer fields with your details. Click the 'Next' button to continue, as shown on the screen below.



Attach documents

Step 4: In the 'Attach Documents' tab you will be able to attach documents such as certificates, declarations, SDS etc. To do so, click the 'Upload' button as shown below.

NOTE: If your products are subject to RoHS providing objective evidence is mandatory.

The following documents are acceptable forms of documentation for RoHS compliance (objective evidence):

- a) Supplier declaration
- b) Contractual agreement
- c) Full material disclosure
- d) Analytical test results—Must be performed by an accredited lab, dated, include results for all relevant homogenous materials, show results and/or explicitly list exemptions

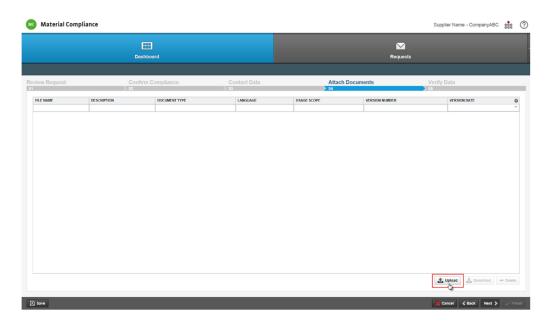
- e) Website declarations—Must include signature, identification of any exemptions, material weight
- f) IPC 1752-2 formats Classes D

Documentation must include:

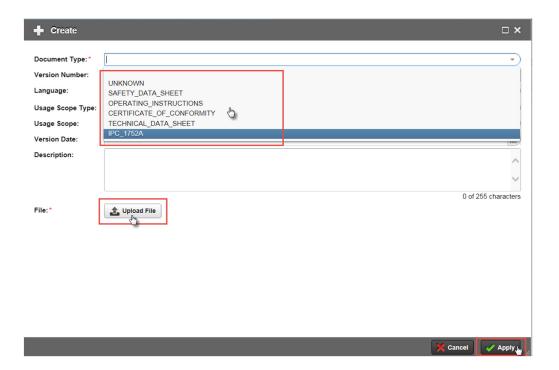
- a) Vendor name.
- b) Signature of a responsible party.
- c) Current RoHS version: 2011/65/EU including Commission Delegated Directive 2015/863, 10 RoHS substances.
- d) Exemptions must be explicitly stated along with expiration dates and actual values present.
- e) No ambiguous statements or disclaimers.
- f) Identity of material that is easily traceable to BD part numbers. In addition, if the item that BD purchases is an assembly, the certificate should cover the entire assembly.

In other words, the documentation should include:

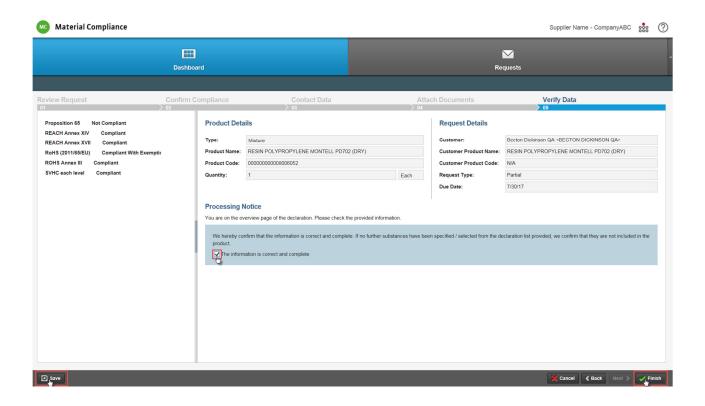
- Statement that proof of compliance is available for every material, component or part that makes up the assembly.
- RoHS Certification of manufacturing/assembly process.



Step 5: In the pop-up window select the 'Document Type' from the drop-down list and attach the file by clicking the 'Upload File' button. To complete the action, click the 'Apply' button as shown below.



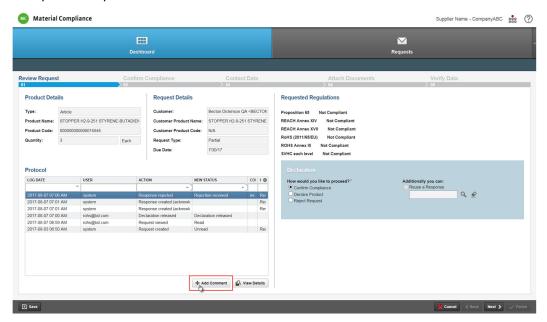
Step 6: In the 'Verify Data' tab, click 'The information is correct and complete' to confirm that the provided information is correct and complete. To complete and send the response, click the 'Finish' button. If you want to store the information for your own internal purposes, click the 'Save' button. Please see the screenshot below.



Add comment

Step 1: You can add a comment for internal use to each request. When you click the 'Edit selected request' button, you will be redirected to the Review Request where by clicking the 'Add Comment' button you will be able to attach a note in the pop-up window as shown below. These are internal notes

that will not be visible for BD, but they can be helpful if more than one person within your company completes requests.



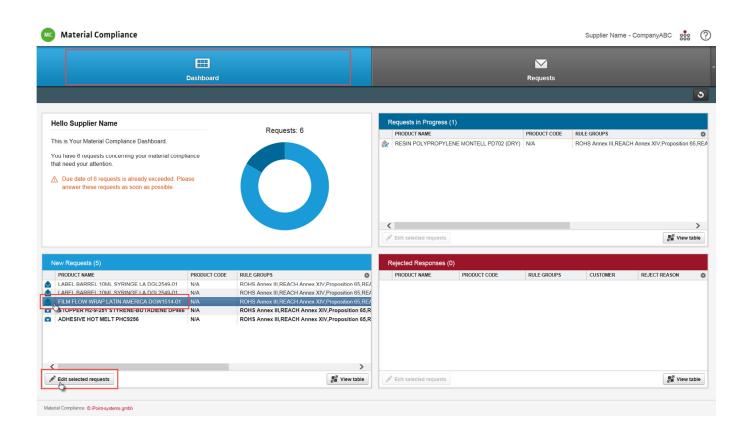
Step 2: Click the 'Save' button to attach your note as shown in the screenshot below.



Declare product

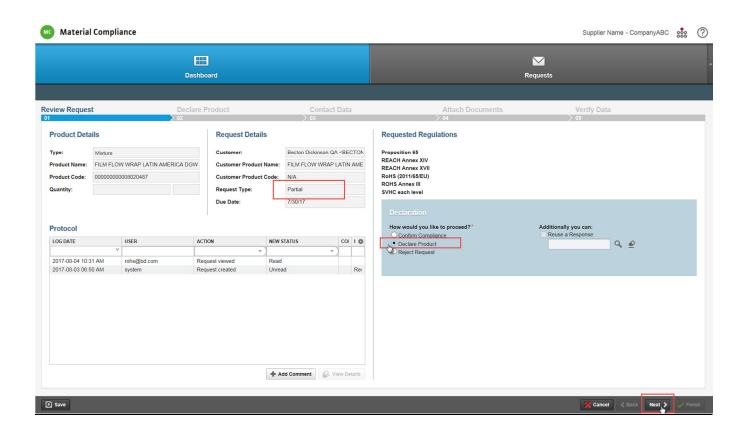
Step 1: If you want to report substances present in your product instead of confirming product compliance, go to the 'Dashboard' bookmark and click an item you want to update as shown below.

NOTE: The approach preferred by BD is for suppliers to provide full material disclosure (FMD). This ensures that the data collection effort is very efficient in the long term as only changes to the supplied material need to be communicated to BD.

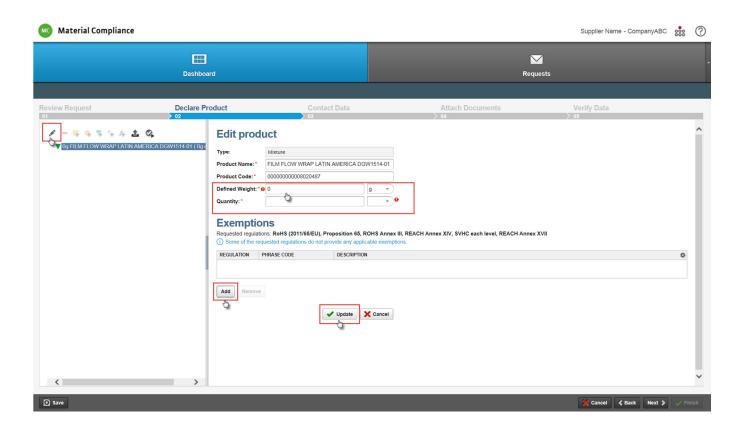


Step 2: Click the 'Declare Product' radio button and the 'Next' button as shown below to continue

NOTE: Since this is a 'Partial' request type you do not have to provide us with the entire composition of your product. When the request type is 'Full', you must provide us with 100% composition of your product, otherwise the system will not allow you to complete the request.



Step 3: In the 'Declare Product' tab click the edit symbol at the top left to review and edit the product data. Almost all product-related fields are editable. To change the defined weight, click text box 'Defined Weight'. When you have finished your edits, click the 'Update' button. Please see the screenshot below.

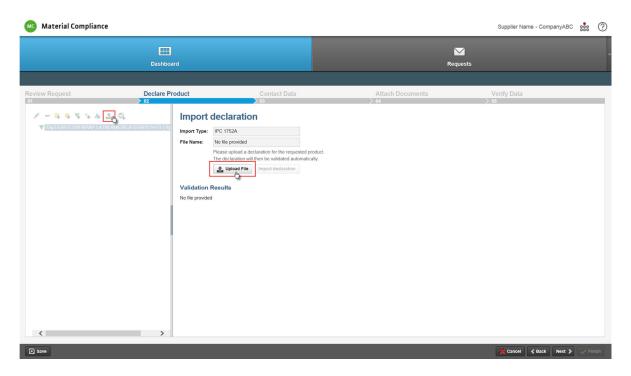


Step 4: At the top left section you can create the product structure manually, including substance details or import an existing document (IPC 1752) to build up the product tree. Please find below the definitions of the icons you should use to create your product structure.

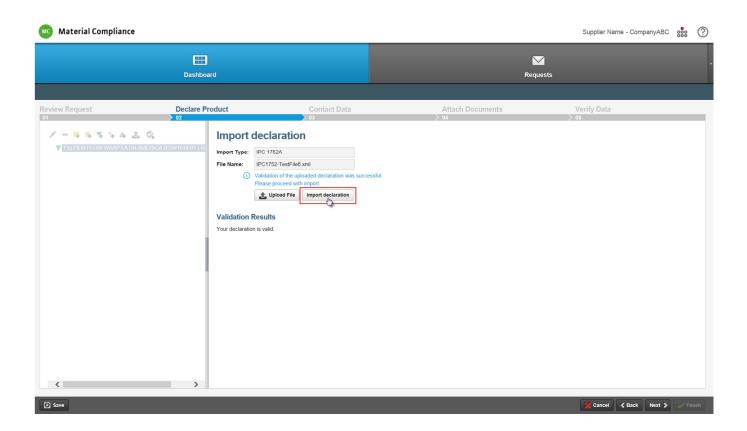
- Edit the selected tree node
- Delete the selected tree node
- Add a new Article to the tree node
- Add a new semi-component to the tree
- Add a new Mixture to the tree
- Add a new homogeneous material to the tree
- Add a new Substance to the tree
- Import tree
- Validate tree

Import IPC file

Step 1: To import the composition of your product, first click the 'Import tree' symbol at the top left. Then click the 'Upload File' button as shown below.



Step 2: If your uploaded declaration was successfully validated, a message "Your declaration is valid" will appear. Click the 'Import declaration' button as shown below.

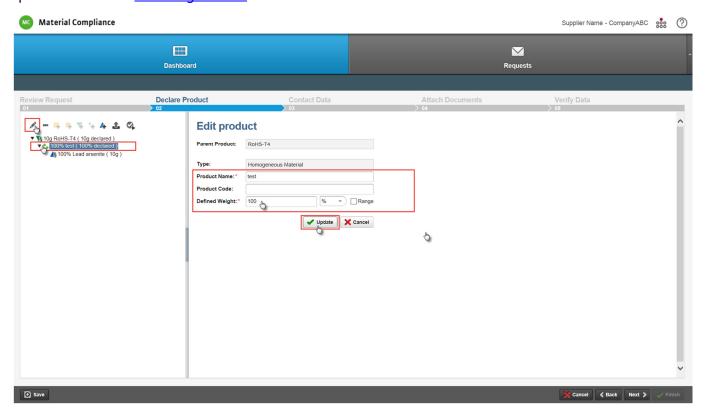


How to build a product structure

Step 1: You have the opportunity to describe the composition of your product. You can build the structure and define the substances by using the appropriate buttons in the section on the left. First you have to select the edit symbol and then go to the respective field to change the product-related data. When you have finished editing, click the 'Update' button to save the changes.

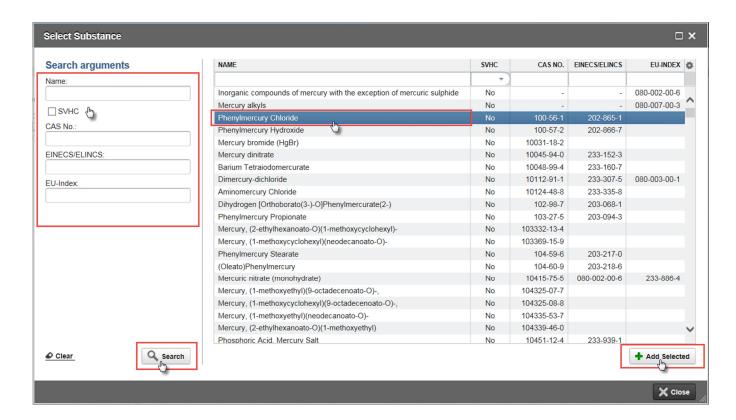
NOTE: An article is defined in REACH as 'an object which during production is given a special shape, surface or design that determines its function to a greater degree than its chemical composition.'

Article 33 of the REACH regulation defines the duty of article suppliers to communicate information on SVHC (substances of very high concern) in their articles to recipients and consumers. The supplier of a product that contains(s) a candidate list substance of very high concern in a concentration above 0.1% weight by weight of that article, is required to inform the recipient and, on request, the consumer, of the presence of that substance by providing them, as a minimum, with the name of the substance in question. Refer to REACH guidance on articles for more information.



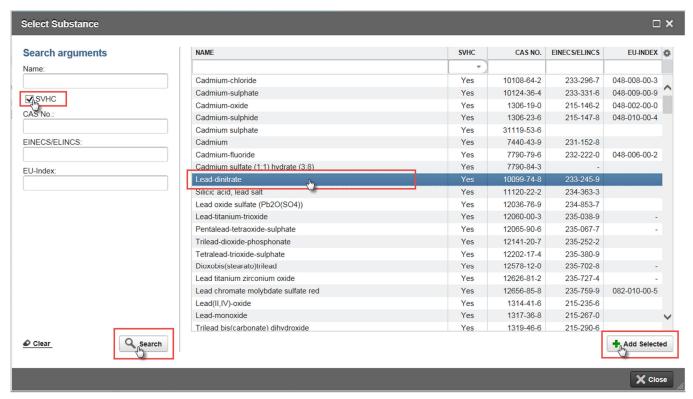
Step 2: To add a new substance to the tree, click the plus symbol (+) with the blue triangle at the top left. This will open a pop-up window where you can search for the specific substance you want to add or replace. Enter search criteria, such as name of substance, CAS No, EINECS/ELINCS or EU-Index,

then click the 'Search' button. Select the relevant substance and click the 'Add Selected' button as shown below.



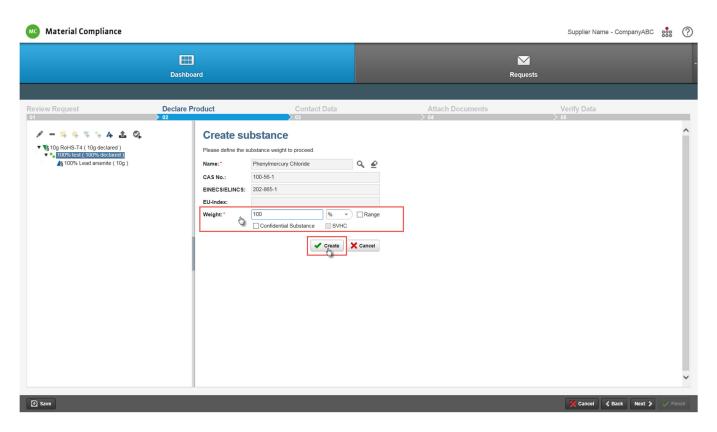
NOTE: If you want to report a SVHC, click the 'SVHC' checkbox in the pop-up window. Then click the 'Search' button. Substances present on the latest EU REACH regulation 'substances of very high concern' candidate list will be listed in the window where you will be able to select one of them. To complete the action, click the 'Add Selected' button as shown below.

NOTE: If the CAS number you entered is not found, please contact the SustainHub Service Desk (details can be found in the FAQ section of this document).

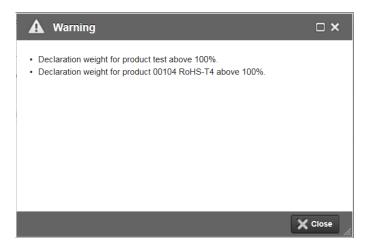


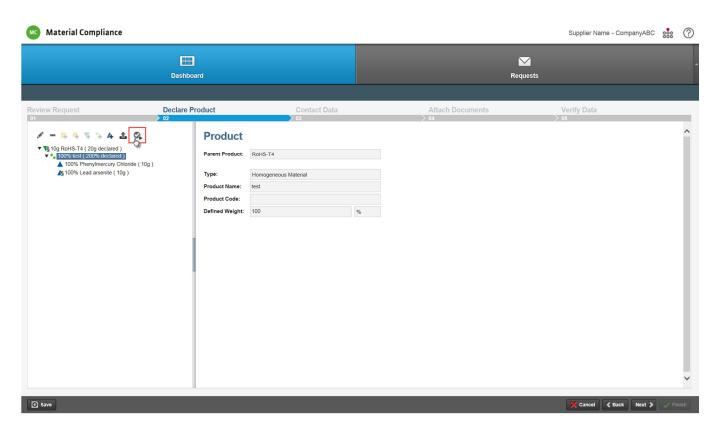
Step 3: In order to proceed, you need to define the substance weight and unit type (% or ppm). Click the 'Create' button to store the added substance as shown below.

NOTE: If you want to delete a substance added by mistake, select the substance and click the delete symbol at the top left. After deletion, the substance is no longer listed in the product declaration overview.



Step 4: Validate your declaration by selecting the 'validate tree' symbol at the top right above the tree as shown below. If you have any errors in the construction of your tree, a warning message will pop up. An example message is shown below. If your tree is correct you will see 'no warnings found'.

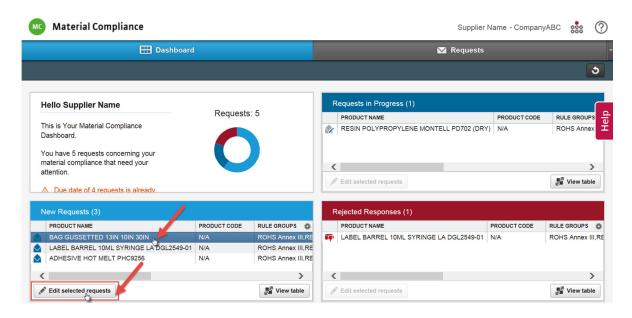




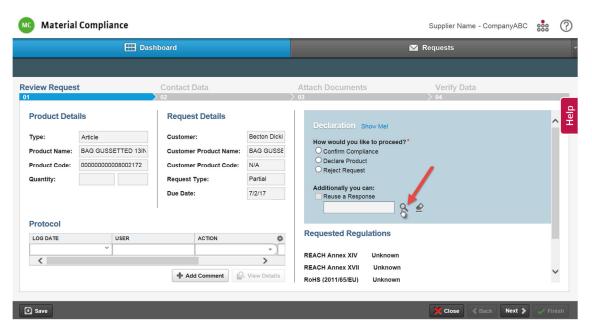
Step 5: Click the 'Next' button to complete the product declaration. In the next steps you will be asked to complete contact data, attach document(s) if applicable and confirm that all the information provided is accurate to the best of your knowledge. These steps were covered in the 'Confirm Compliance' section.

Re-use option to copy answer from other request

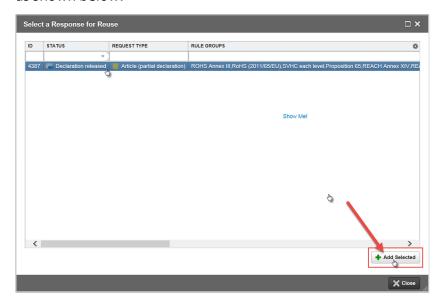
Step 1: In the SustainHub, you can copy an answer you have previously provided for another request. To do so, select an item into which you want to copy your prior answer and click the 'Edit selected requests' button, as shown below.



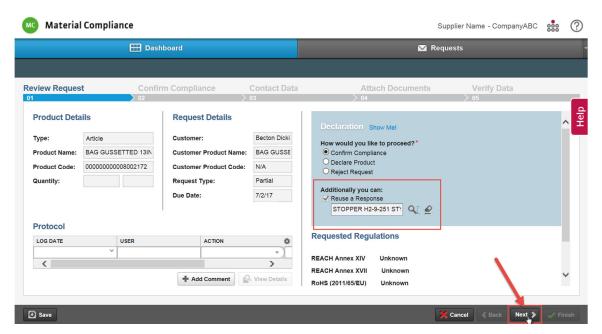
Step 2: Next, click the search icon, as shown below.



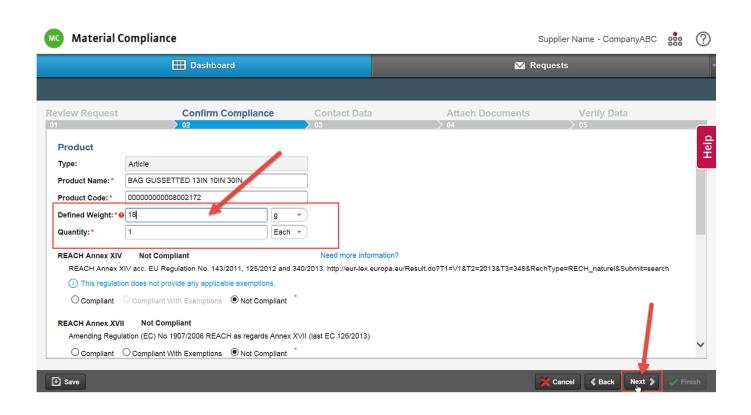
Step 3: When new window pops up, select a response for reuse. Then click the 'Add Selected' button, as shown below.



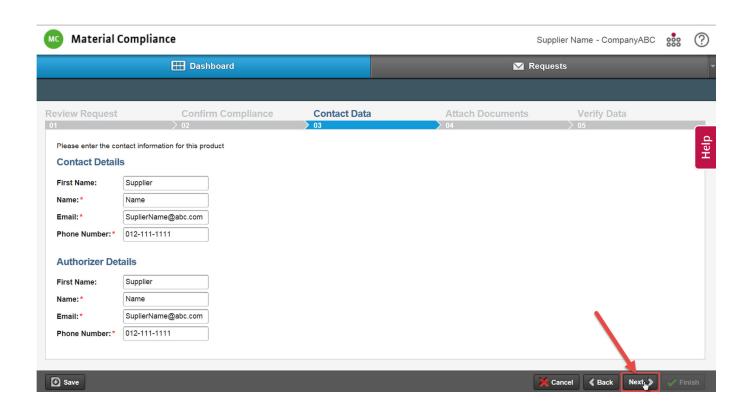
Step 4: Next to the search icon you will see the item you have selected. To proceed, click the 'Next' button, as shown below.



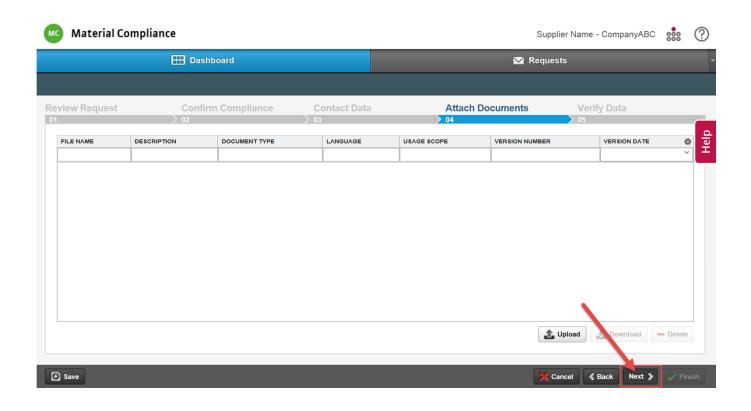
Step 5: Your response provided for other item will be already copied. Once you have selected the correct unit of measure in the 'Defined weight' and 'Quantity' fields, click the 'Next' button to continue. Please see the screenshot below.



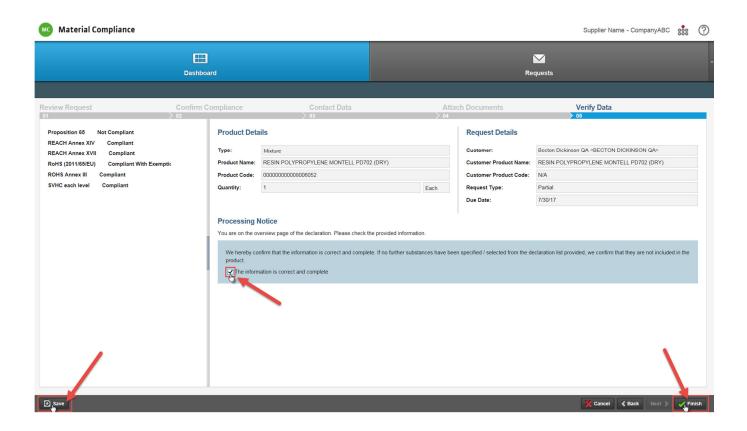
Step 6: In the 'Contact Data' tab you will be able to enter contact information for a product. If you are the only point of contact for compliance related inquiries, populate the Authorizer fields with your details. Click the 'Next' button to continue, as shown below.



Step 7: In the 'Attach Documents' tab you will be able to attach documents such as certificates, declarations, SDS etc. To do so, click the 'Upload' button and follow the instructions described in the 'Attach documents' chapter. If you do not need to attach any documents, please skip this step by clicking the 'Next' button, as shown below.

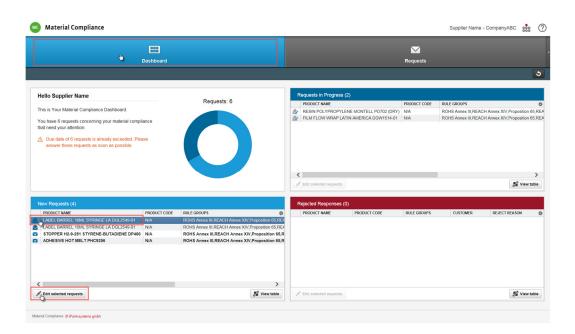


Step 8: In the 'Verify Data' tab, click 'The information is correct and complete' to confirm that the provided information is correct and complete. To complete and send the response, click the 'Finish' button. If you want to store the information for your own internal purposes, click the 'Save' button. Please see the screenshot below.

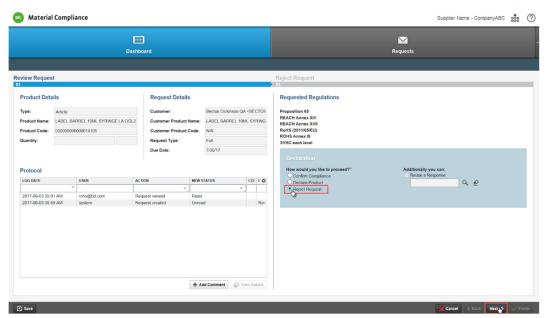


Reject request

Step 1: If you want to reject a request, go to the Dashboard at the top of the Material Compliance app and select a request from the editable section. Next, click the 'Edit selected request' button as shown below.

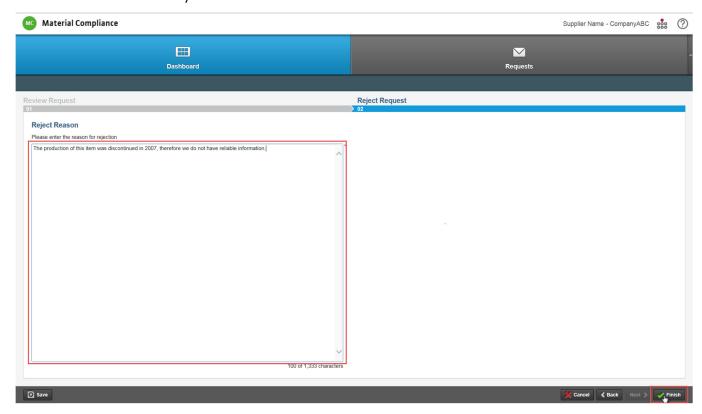


Step 2: Click the 'Reject Request' radio button and the 'Next' button to continue as shown below.



Step 3: Enter your reason for rejection into the text box and click the 'Finish' button as shown below.

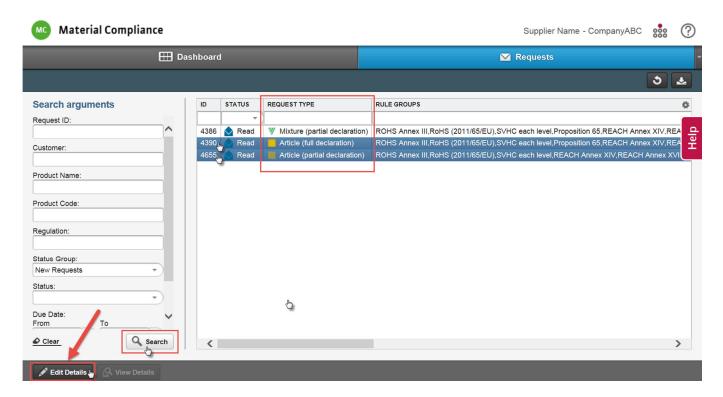
NOTE: This is a mandatory field.



Multi-edit option to answer multiple requests

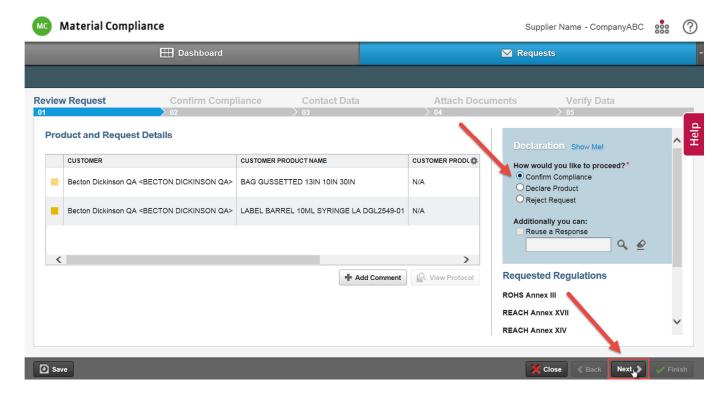
Step 1: In the SustainHub you can select several requests to answer them as one. To do so, go to the 'Requests' bookmark, select the appropriate items and click the 'Edit Details' button, as shown below.

NOTE: If you want to declare product, providing us with substances that your product consist of, selected items must have the same Request Type (Article or Mixture).

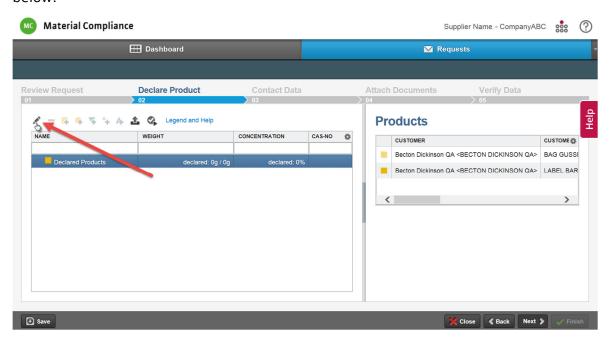


Step 2: Select one of three options that are available (Confirm Compliance, Declare Product or Reject Request) and follow the instructions described in previous chapters for particular option.

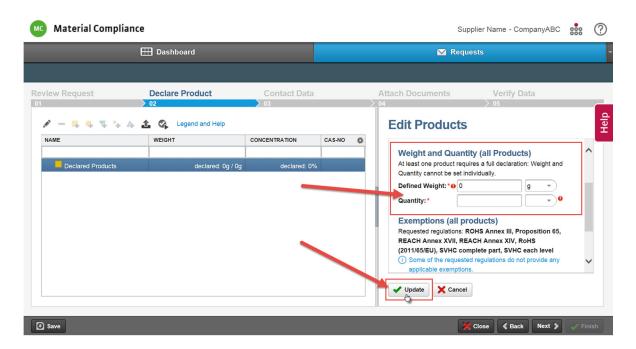
NOTE: If the answer is 'Compliant with Exemption', it is not possible to declare different exemptions for each product. Products for a multiple answer should be selected based on their compliance status so they can all be handled the same, including exemptions.



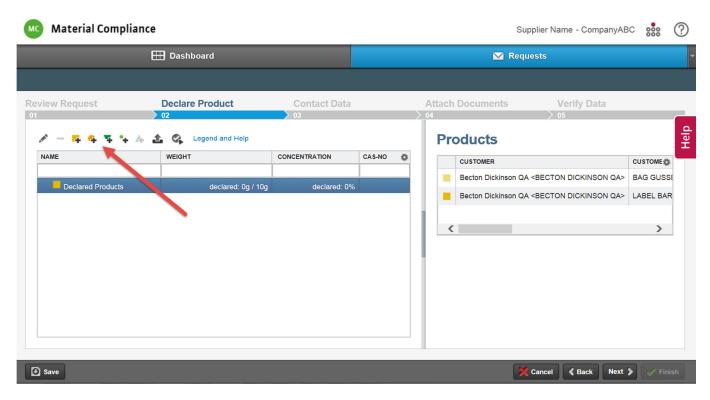
NOTE: If you answer using Declare Product option, first click the edit symbol at the top left, as shown below.



Next, define weight and quantity and click the 'Update' button, as shown below.



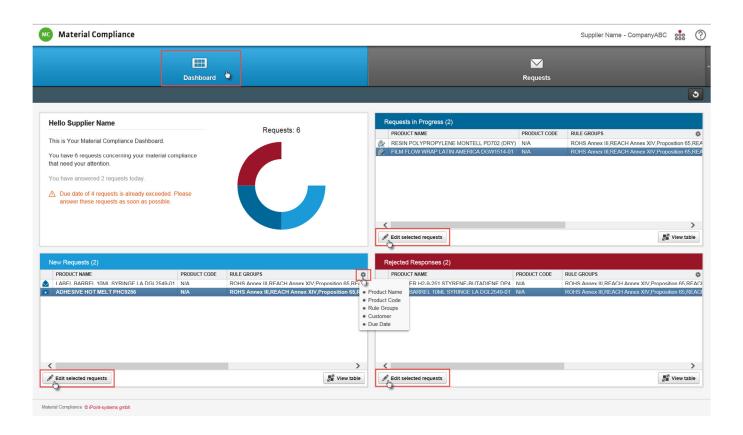
Then three construction options will be active, as shown below. The instructions for using these options were described in 'How to build a product structure' chapter.



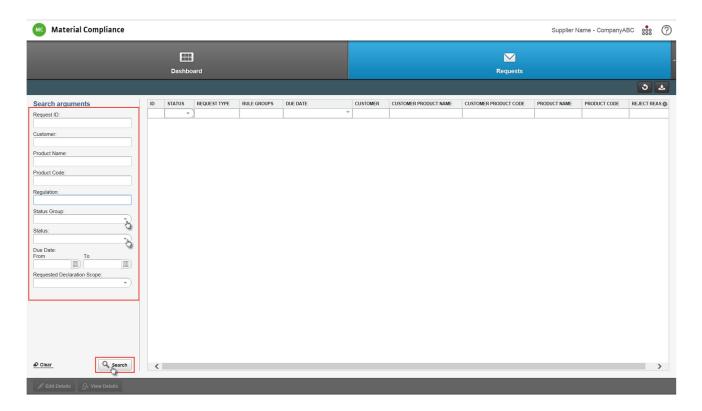
Find requests

In the Material Compliance app you have two bookmarks where you can find your requests. In the Dashboard you have three sections: New requests (requests still open), Requests in progress (requests started but not yet completed) and Rejected responses (requests rejected by the BD Team.)

Step 1: In the Dashboard, select the item out of the three editable sections that you want to update and click the 'Edit selected request' button. To customize your view of your requests, click the setting icon and select parameters that you want to be visible as shown below.

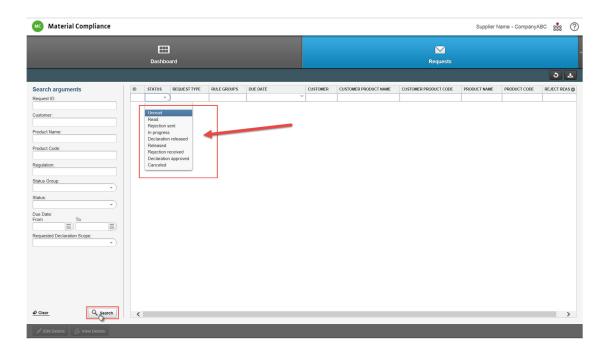


Step 2: When you have multiple requests go to the Requests section to search for a specific one. On the left side you have filter windows to help you search for your requests by different categories. Click the 'Search' button to find particular requests. Please see the screenshot below.



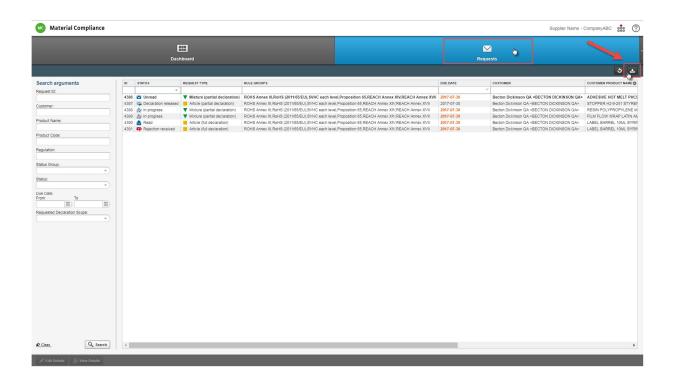
Step 3: You can filter by requests status as shown below. Please review the following definitions of request statuses:

- Unread—request has been received, but you have not reviewed it yet
- Read—request has been received and reviewed by you
- Rejection sent—request has been received and you have sent rejection to BD
- In progress—you have started work to respond but not yet completed
- **Declaration released**—BD has accepted your response
- Released—you completed a response and sent to BD
- **Rejection received**—BD has rejected your response. You have to re-work the response
- **Declaration approved**—your response was accepted by system, no technical errors detected
- Cancelled—BD cancelled a request, no action needed from you

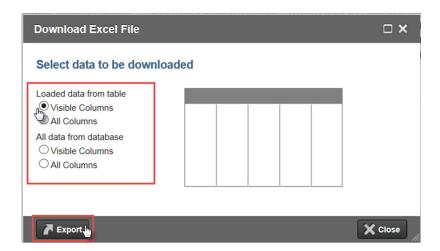


Download data from requests to Excel file

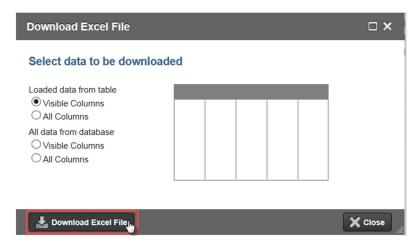
Step 1: You are able to download data for all requests to an Excel file. You can use this feature to share information internally with co-workers who do not have access to SustainHub. To do so, go to the Request section, select the items from which you want to export data, and click the download button as shown below.



Step 2: Select data to be downloaded by clicking the relevant radio button and then click the 'Export' button, see the screen below.

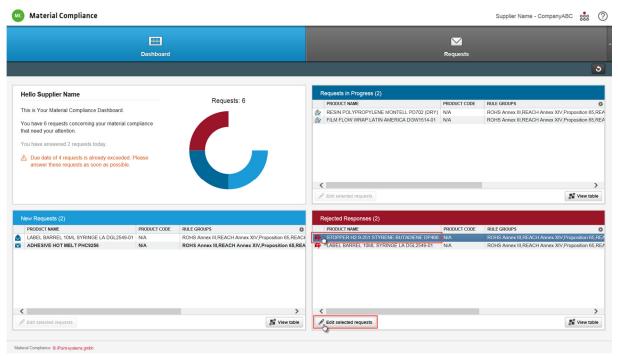


Step 3: Click the 'Download Excel File' button to download file to your computer. Please see the screen below.

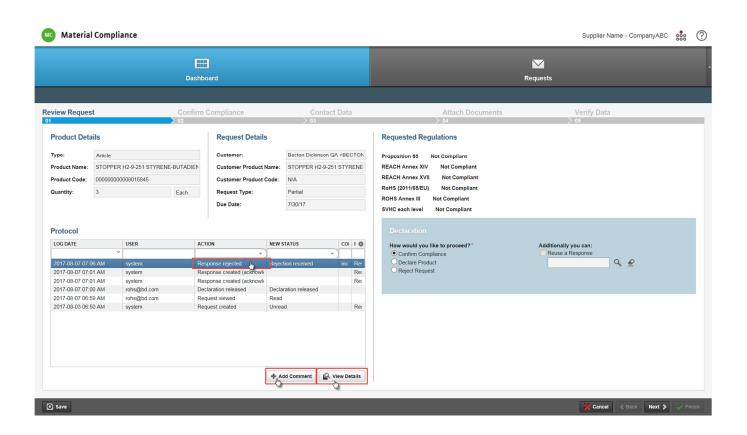


Rejected responses

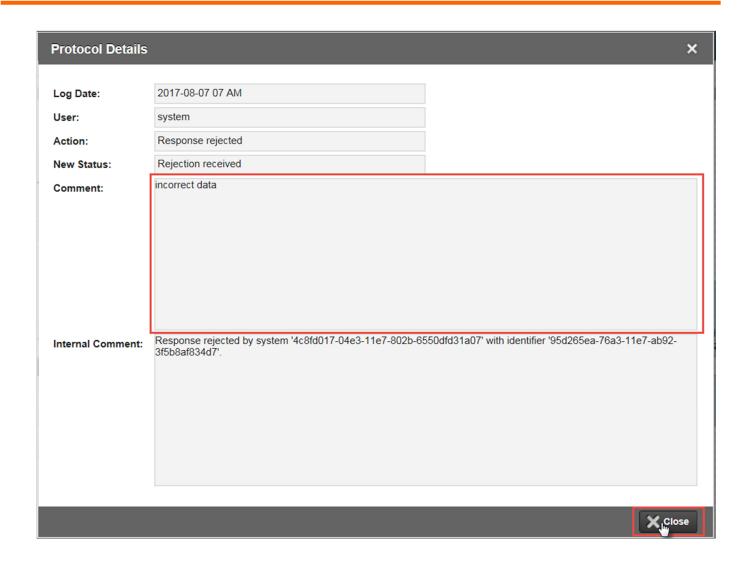
Step 1: To see more details regarding the rejected responses, select an item from the 'Rejected Responses' section and click the 'Edit selected requests' button as shown below.



Step 2: Select 'Response rejected' in the Action column and click the 'View details' button as shown below.



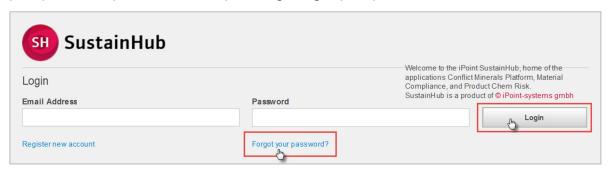
Step 3: The 'Protocol details' window will pop up and you will see the reason for rejection in the 'Comment' window shown below. Click the 'Close' button to return to the Material Compliance app.



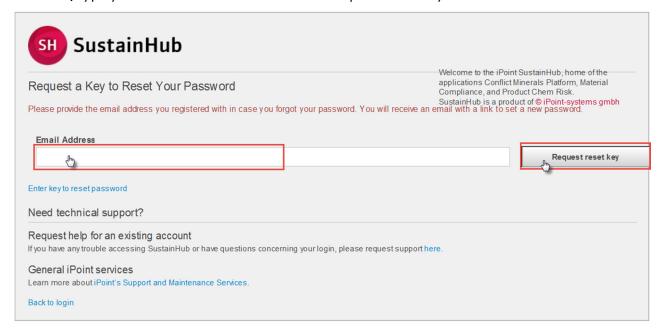
Step 4: To respond to rejected responses, you have to go through the same steps as previously explained. Please read the comment carefully to avoid the same error.

Subsequent Logins

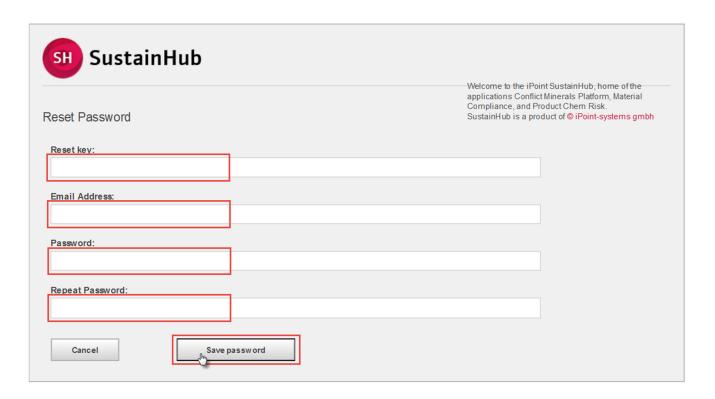
Step 1: Clicking the link found in the email will take you to the SustainHub portal. You will be asked to verify your email and enter your password. Click the 'Login' button to enter the portal. If you forgot your password, you can reset it by clicking 'Forgot your password?' as shown below.



Step 2: You will be redirected to a page where you will be able to request a key to reset your password. To do so, type your email address and click the 'Request reset key' button as shown below.



Step 3: You will receive an email with a reset key that you will have to enter to set up a new password. To complete the action, click the 'Save password' button as shown below.

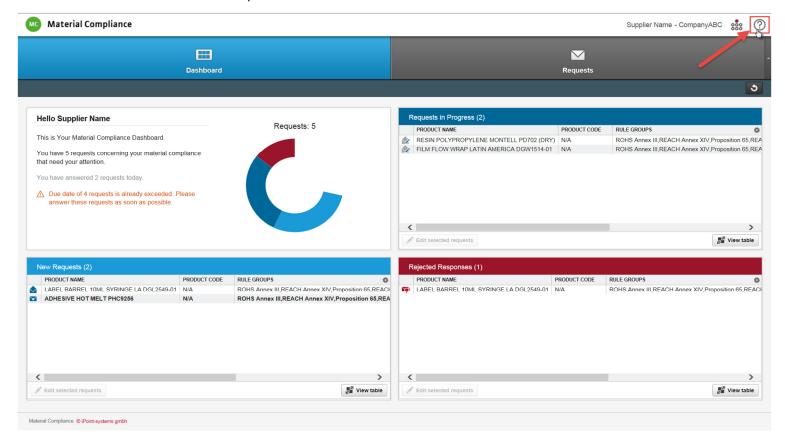


Important points to remember:

- All fields with a red asterisk are mandatory and it is not possible to submit a response unless these fields are completed.
- If a substance that you would like to add is not listed, please contact the <u>Service Desk</u>.
- Requests are always visible in the SustainHub and you can review your requests at any time.
- If you have any queries, please refer to this guidance document or contact us at bd_moc@bd.com for further assistance.
- If you experience any technical issues, please contact Service Material Compliance by clicking http://www.ipoint-systems.com/service-desk/sustainhub/material-compliance-app/ and go the

Service Desk Material Compliance, or click the 'Question mark' within the SustainHub portal as shown below.

You can use the same credentials as you did to login to the SustainHub portal. More details are in the *Service Desk User Manual* that you can find <u>here</u>.



MOC request

BD is committed to reducing our environmental impacts and we encourage our customers and suppliers to do the same. Evolving global environmental regulations and increasing customer demands have made understanding the full composition of all materials and products a top priority for BD. The approach preferred by BD is for suppliers to provide full material disclosure (FMD) by selecting the 'Declare Product' option and providing the entire composition of the product. This ensures very

efficient data collection in the long term as only the changes to the supplied material need to be communicated to BD.

If you are not able to provide FMD, you will be required to provide compliance information of products in relation to the various regulations which will be listed under 'Confirm Compliance' option.

NOTE: The links to the regulations or lists of regulated substances may be found in Section Definitions of this guidance document.

Subsequent requests

New requests will be sent to you by email as regulatory and BD requirements are updated. Once you have logged into the SustainHub portal, you will see a list of requests we have sent to you.

II. Definitions

Material nature

Substance—a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.

Mixture—a preparation or solution composed of two or more substances.

Article—object that is given a special shape, surface or design during production which determines its function to a greater degree than its chemical composition.

Article with intended release—objects that release substances during their use, and this release is intended as part of the main function of the article or to provide a desired other effect.

Packaging material—Material used to enclose or protect products for distribution, storage, sale and use, including bag, carton, top/bottom web, corrugated container, shrink film. Under the REACH regulation, packaging is considered an article and as such should be assessed independently of the object it contains.

SustainHub

The SustainHub is a material compliance platform (MCP)—a web application that is used for data collection. It is also a communication tool between BD and its suppliers. The abbreviation for SustainHub is SuHu.

FMD—Full material disclosure

Full material disclosure is a full and complete breakdown of the material composition to the lowest substance level (CAS) including all additives. Substances in polymers which cannot be mechanically

disjointed must still be reported (e.g., phthalates in PVC). Additives used in a polymerisation process but do not end up in the polymer must also be reported.

Intentionally added substance

Substance added to a product in any amount to achieve specified properties.

Concentration threshold

Substance concentration below which the presence of the substance is considered insignificant for specific reasons, unless the substance is intentionally added in order to achieve particular properties of the product.

SVHC—Substances of very high concern

Some substances have hazards that have serious consequences. For example, they cause cancer (carcinogenic), or they have other harmful properties and remain in the environment for a long time (persistent) and gradually build up in animals (bioaccumulative) and these are substances of very high concern. This category also includes substances demonstrated to be of equivalent concern, such as endocrine disruptors. One of the aims of REACH is to control the use of such substances via authorisation and encourage industry to substitute these substances for safer ones. Under the REACH regulation, the European Chemical Agency (ECHA) has created the REACH candidate list of substances of very high concern (SVHC). This list is updated every six months.

OEM—Original equipment manufacturer

OEM is a term used when one company makes a part or subsystem that is used in another company's end product. As an OEM supplier for BD you are requested to report the product and packaging separately. You can either provide FMD for the product and the packaging or respond to regulatory questions in BD MOC sections.

CAS#, CAS-No.—Chemical Abstract Service index number

Unique numeric identifier assigned by the Chemical Abstracts Service (CAS) to every chemical substance.

EINECS—European Inventory of Existing Commercial Chemical Substances

The EINECS is a list of all chemical substances that were on the European community market between January 1, 1971 and September 18, 1981.

Regulations

Below are links to regulations we reference in the BD MOC requests.

Regulation	Link
EU REACH	www.ec.europa.eu/environment/chemicals/reach/legislation_en.htm
EU REACH - SVHC	www.echa.europa.eu/web/guest/candidate-list-table
EU Restriction of Hazardous	
Substances in Electrical and	
Electronic Equipment Directive	http://eur-lex.europa.eu/legal-
2011/65/EU including	content/EN/TXT/?qid=1470750208340&uri=CELEX:32015L0863
commission delegated	
directive 2015/863 (RoHS 3)	
Annex XIV of REACH	https://echa.europa.eu/addressing-chemicals-of-
(Authorization List)	<u>concern/authorisation/recommendation-for-inclusion-in-the-authorisation-list/authorisation-list</u>
California Proposition 65	www.oehha.ca.gov/prop65/prop65_list/Newlist.html
Table 3.1 of Annex VI of the EU	
Classification Labelling and	eur-lex.europa.eu/
Packaging (CLP)	

Annex XVII to EU REACH	https://echa.europa.eu/addressing-chemicals-of-
regulation	concern/restrictions/substances-restricted-under-reach

FAQ—Frequently asked questions

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Q1: What happens if I do not respond to the request?

A: Lack of response within the given time will result in escalation to BD Global Procurement. If a satisfactory response is not provided, BD may be forced to seek an alternative supplier. Please contact the BD SBC Team (bd_moc@bd.com) to discuss or obtain further guidance.

 Q_2 : I am not the correct person to be contacted for environmental compliance issues. How can I indicate the correct contact in my company?

A: You can indicate the correct person when you receive the first email with the link to the portal and are asked to verify contact details. The whole process of adding a responder is described in the *Contact*

data section in this document. When you receive emails with requests, you may respond to this message and provide BD with correct contact details.

NOTE: You can forward the email with the registration key to another person, although that person will have to enter the email address of the receiver (initial email to which request was sent) in order to register.

Q3: Why am I being asked about regulations which I am not legally obliged to comply with (e.g., I am not supplying to EU and I am asked about SVHCs from the EU REACH regulation)?

A: BD is a global organization and as such sells and ships its product to various countries around the world. Therefore, even if you do not sell or ship your products to BD or any other entity in Europe, they may be incorporated into BD products which are sold or shipped to other regions such as Europe. BD needs to comply with these regulations and is therefore reliant on information provided by its suppliers to meet these obligations.

Q4: I have already answered a request. Why am I being asked again?

A: Adherence to the most recent environmental and health regulations as well as the ability to provide our customers with up to date information relating to our products is a top priority for BD. To achieve this, BD tracks changes to regulations and as a result updates the BD MOC request accordingly. Updated requests are then sent to our suppliers.

NOTE: If you provide an FMD, then we will not have to contact you regarding the composition of your products as often.

Q5: What happens if I do not respond on time?

A: If you are not able to provide a response within the specified timeline, please immediately contact the BD MOC team at bd_moc@bd.com.

NOTE: If you are not willing to provide BD with the necessary data within the requested timeframe, this may result in BD seeking alternative suppliers.

Q6: I am unable to login to the SustainHub portal. What should I do?

A: With any technical issues please contact Service Material Compliance by clicking http://www.ipoint-systems.com/service-desk/sustainhub/material-compliance-app/ or click the 'Question mark' within the SustainHub portal. You can find more details in the 'Important points to remember' section in this document.

Q7: How should I calculate and report substances of very high concern in articles?

A: The EU court ruling requires SVHC concentration calculation on the lowest article component level. At this point the SVHC is no longer part of a substance/mixture, but part of an article. When considering a (very) complex object, the court ruling and the guidance require the SVHC mass ratio to be calculated on the lowest article level. This is the level where the SVHC first becomes part of an article and is no longer part of a substance/mixture. For example, if the substance or mixture used in the combining of the articles contains an SVHC, the concentration will need to be calculated over the total weight of the resulting complex object as this is the first time the SVHC becomes part of an article.

Q8: I do not see all materials I supply to BD listed in the MD Supplier portal. I also see products which are not supplied by my company. What should I do?

A: The current BD approach is to collect compliance information on the ongoing basis. Due to the broad BD portfolio you may be contacted more than once per year by the SBC team. Therefore, you may not see all your materials that you supply to BD in one request. If you notice any other discrepancies in the SustainHub portal, please immediately communicate this to the BD SBC Team by sending an email to: bd_moc@bd.com.

Q9: Why should I answer the question about product weight?

A: We ask you to provide the net weight of the item you supply to BD. This information together with the information about the concentration of the substances in the item is needed to calculate total weight of the substance per item. Units of measure we use are the <u>International System of Units (SI)</u> derived units to make the questionnaire unified across the globe. If you use some other units of measure, please convert them into SI derived units.



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