



## **Modern Slavery and Human Trafficking Statement for the financial year ended 30 September 2018**

Advancing the world of health is BD's corporate purpose and the inspiration behind our global enterprise. It is a call to action that resounds with BD associates around the world. BD's corporate culture is guided by our Core Values:

- We do what is right
- We are all accountable
- We improve every day
- We help each other be great
- We are authentic

BD associates are expected to follow these values in all aspects of business, including dealings with suppliers, customers and other stakeholders. We see the modern social and environmental challenges our world faces as opportunities to make a difference while strengthening our company. Our approach is centered upon shared value creation, meaning how we address unmet societal needs through business models and initiatives that also contribute to the commercial success of BD.

The UK Modern Slavery Act of 2015 requires commercial organizations carrying out business in the United Kingdom with an annual turnover of at least £36 million to publish a statement regarding human trafficking and modern slavery. The following describes BD's efforts in this regard.

### **1. Organization, Business, and Supply Chains**

BD is a global medical technology company that partners with customers and stakeholders to improve medical discovery, diagnostics and the delivery of care. This statement covers BD's programs and activities for our fiscal year ending on September 30, 2018. In FY'18, BD operated three worldwide segments: BD Medical, which included Diabetes Care, Medication Management Solutions, Medication and Procedural Solutions, and Pharmaceutical Systems; BD Life Sciences, which included Biosciences, Diagnostic Systems, and Preanalytical Systems; and BD Interventional, which included Surgery, Peripheral Interventional and Urology and Critical Care.

In FY'18 our operations spanned over 120 locations worldwide, including over 85 directly-owned manufacturing and supply chain operations. We were comprised of more than 65,000 associates serving over 190 countries, making BD a truly global organization. In FY'18, BD worked with approximately 30,000 suppliers globally, including parts, raw materials, packaging, services and equipment suppliers or vendors.

## 2. Policies

BD is committed to acting in full compliance with all applicable laws and BD's high ethical standards, and ensuring that no instances of modern slavery or human trafficking occur in any part of our own businesses or our supply chain. To that end, BD maintains several policies that reflect our Core Values, which BD associates are expected to follow in all aspects of business, including dealings with suppliers, customers and other stakeholders. These include:

- The Human Rights statement in the [BD Code of Conduct](#), which prohibits the use of forced, prison, indentured, bonded or involuntary labor in all of BD's operations. BD is committed to conducting business in a manner that is compliant with all applicable laws, including employment and human rights laws and regulations wherever we have operations.
- [BD Expectations for Suppliers](#), which prohibit the use of involuntary labor of any kind, including slave labor, indentured/debt labor, forced labor, or prison labor by BD suppliers.

## 3. Due Diligence

For our own operations, including our manufacturing sites, BD maintains robust Environmental, Health, and Safety (EHS) and Ethics & Compliance programs that foster a culture of compliance with the [BD Code of Conduct](#) and local laws, whichever are more robust.

Within our supply chain, suppliers receive an initial assessment against twelve risk factors including corporate social and environmental risk factors, during the on-boarding process.

Newly-acquired operations are prioritized for review to ensure that they meet BD's expectations and policy requirements.

## 4. Assessing and Managing Risk

The human rights commitments in the [BD Code of Conduct](#) are integrated across our operations through a number of oversight systems and processes. Our Integrated Supply Chain (including Operations, Supply Chain, Procurement and Sustainability/EHS) and Human Resources functions ensure compliance with our policies prohibiting forced labor, human trafficking and modern slavery across all of our operations.

At the manufacturing level, our Global Manufacturing teams ensure continued compliance through several layers of risk management, such as regular internal audits that include desk-based and on-the-ground EHS audits.

Additionally, BD employees are trained to report concerns around Code of Conduct violations to the BD Ethics Hotline (see page 39 of the Code of Conduct). BD suppliers are also encouraged to report concerns through the same process (see page 7 of BD's Expectations for Suppliers). Such reports may trigger additional risk assessments involving the Ethics Office, Global Operations, and any other relevant departments, until identified risks are adequately managed, by appropriate follow-up actions where necessary.

[BD's Expectations for Suppliers \(EFS\)](#) was published in 2009, and since that time BD has worked to communicate the EFS with suppliers and confirm their compliance. Compliance has been evaluated primarily through written acknowledgements and through a pilot audit initiative where suppliers were prioritized based on a risk assessment that included industry, geography and information from 3<sup>rd</sup> party risk monitoring services. Furthermore, as with BD employees, suppliers and their workers have access to the BD Ethics Hotline, providing BD with an additional monitoring and oversight mechanism through which concerns about modern slavery may be reported.

Across all of our programs that address Human Rights and Modern Slavery, we assess management effectiveness through periodic program reviews. We also participate in industry working groups where we learn best practices that have been implemented by companies across sectors, and we seek to apply those where they add value to our programs.

## 5. Training and Capacity Building

BD is committed to raising awareness about human rights risks, including risks of modern slavery, across our business and supply chain. To that end, BD provides training to internal audiences, particularly those in procurement functions, on implementation of our Expectations for Suppliers.

BD has conducted awareness-raising trainings on our Expectations for Suppliers for key suppliers via Supplier Management meetings and summits in a number of regions where these suppliers are located. These trainings include definitions of forced labor, modern slavery, and human trafficking, tools on identifying red flags and high risk areas, and guidance on best practices.

Additionally, all BD associates are trained on our BD Code of Conduct, annually.

BD strives to continuously improve its programs to ensure compliance with applicable laws and BD's high ethical standards and to meet the expectations of our customers, our shareholders, our associates, our communities and other stakeholders.



Vincent A. Forlenza

*Chairman and Chief Executive Officer*

26 April 2019

*This Modern Slavery and Human Trafficking Statement applies enterprise-wide to all BD entities. For the purposes of the Modern Slavery Act 2015 in the UK, it applies to the following entities: Bard Limited, Becton Dickinson Infusion Therapy UK, Becton, Dickinson UK Limited, and Carefusion UK 306 Limited.*