

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

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

- We do what is right;
- We thrive on innovation and demand quality
- We are all accountable
- We learn and improve every day
- We help each other be great

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 California Transparency in Supply Chains Act requires BD to disclose the extent of our anti-trafficking and anti-slavery human rights efforts in our direct product supply chain in five areas: verification, audits, certification, internal accountability, and training. The following describes BD's effort in this regard.

1. Verification

BD is committed to working with suppliers who can demonstrate their efforts to identify, mitigate, and remediate any known or suspected human rights abuses in their own operations or in their own supply chains. Our Expectations for Suppliers (EFS) document details the minimum standards that all our suppliers must meet with regards to human rights and related ESG topics. More detail on this document is provided in the Certification section, below.

During supplier qualification, new suppliers are assessed for Ethics and Compliance via a third party – which includes any reputational risk – and are asked to read and confirm compliance with our BD Expectations for Suppliers document. New suppliers are also assessed via desktop audit process (below).

Suppliers are analyzed, via a third party, against geographic or location risk¹ and geopolitical risk as it relates to modern slavery and other human rights risks, and a third-party news monitoring system is in place to flag any issues as they arise. Suppliers that are deemed as representing an increased risk and/or are key BD suppliers are prioritized for detailed assessment via a third-party administered desktop audit, review by Responsible Sourcing Operating Committee, and/or full in-person audits, depending on the level of risk identified.

Additionally, in partnership with our risk monitoring supplier, using AI and machine learning, we have been working to map our sub-tier supply chains for critical to health product lines. This solution allows us to better understand tier-n risk for specific risk areas; particularly useful for our understanding of BD supply chain's human rights risk where specific regions and commodities are designated as known issues. By using this mapping capability, BD has focused on mapping to specific complex issues, rather than attempting to map a network of this size and scope in its entirety, thus allowing us to focus on areas of our greatest risk and map up to tier-5 of our supply chain for specific risk. This cutting-edge

capability allows BD to more confidently understand our risk profile, and thus target human rights risks directly.

BD deploys this mapping technology as key human rights risks emerge, such as elevated risk for specific commodities coming from specific regions. BD does not report this risk analysis publicly but does communicate through our upstream supplier network to strengthen our understanding of the risk and account for it as necessary.

2. Audits

The human rights commitments in the BD Human Rights Policy and 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 and distribution level, our Global Operations 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.

BD prioritizes suppliers for assessment (via a third-party administered desktop assessment) based on the level of risk based on the location risk detailed above, criticality of the supplier to BD, and our internal dynamic model. This prioritization is ever-evolving as we monitor emerging and ongoing risks, and is guided by third party risk intelligence solutions. Results of this desktop assessment may end in review by Responsible Sourcing Operating Committee, assignment of Corrective Actions, and/or in-person audits, depending on the level of risk identified.

These desktop audits specifically address key Labor and Human Rights practices, in addition to other various related ESG risks, and ask suppliers to show documentation that these practices are put in place effectively. A third-party expert reviews this documentation to ensure a non-biased evaluation. As suppliers are identified as high risk in this desktop audit process, our Responsible Sourcing Operating Committee, consisting of multifunctional representatives tasked with oversight of the BD Human Rights Due Diligence efforts (reporting into the Chief Sustainability Officer and Chief Procurement Officer), works to engage across the company to support the review and remediation of risks or known issues identified within the supplier. If a supplier receives an unacceptable score on their desktop audit BD immediately assigns corrective actions in the tool to improve their score and will evaluate results through this Responsible Sourcing Operating committee to determine the best path for further engagement; this may include the further assignment and review of corrective actions (both in and outside the tool), in-person human rights focused audits, or remediation as necessary. Suppliers are expected to be actively engaged to correct practices highlighted in the Corrective Action program and that this work be done promptly. The Responsible Sourcing Operating Committee reviews supplier engagement and targets further action as part of this work.

BD started our initial desktop audits in FY'2020 and has continued to deploy these audits to key and/or high-risk suppliers.

In addition to our human rights due diligence activities, BD works to ensure that other contact points with suppliers (on site visits, audits performed for other reasons, on-boarding, etc.) include reference to our BD Expectations for Suppliers, provide a process and reminder to report any observed human rights or other Environmental, Social and Corporate Governance (ESG) abuses, and provide training/guidance on what might indicate human rights issues that should be reported.

3. Certification

[BD's Expectations for Suppliers](#) was first published in 2009 and details social, environmental and governance standards which we expect our suppliers to uphold. These standards prohibit the use of involuntary labor of any kind, including slave labor, indentured/debt labor, forced labor, human trafficking, or prison labor. Since publishing this document, BD has worked to communicate the EFS with suppliers (including via online trainings on various changes made as the EFS is updated. More on this in section 5 below) and confirm their compliance. Compliance has been evaluated primarily through written acknowledgements as updates to the document are published and through periodic third party led desktop audits based on a high level of risk. BD includes language that requires its suppliers represent, warrant, and/or certify to comply with the EFS and all relevant laws (including labor laws) in our contracts, purchase orders, supplier terms and conditions, and supplier on-boarding process among others, where failure to comply could be a breach of contract and result in contract termination, payment of damages and other consequences and/or remedies depending on the terms of the agreement.

4. Internal Accountability

BD is committed to acting in compliance with all applicable laws and BD's 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 [BD Code of Conduct](#) - includes our policies on human rights and 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.
- The [BD Global Human Rights Policy](#) - which outlines our policy on human rights in more detail. In FY24, we enhanced our Human Rights Policy to include our values with respect to environmental justice and our acknowledgment of the human right to water.
- [BD Expectations for Suppliers](#) - prohibits the use of involuntary labor of any kind, including slave labor, indentured/debt labor, forced labor, or prison labor, prohibits child labor, and any other human rights abuses by BD suppliers. This document details the minimum standards that all our suppliers must meet with regards to human rights in addition to other topics.
- The [BD Global Speak Up Policy](#) - encourages and expects all associates and agents to speak up about any actual or suspected violations of laws, regulations, the BD Code of Conduct, BD Policies, or relevant industry codes, except as prohibited by law, as per its Global Speaking Up Policy. Those that speak up in good faith are protected against any form of retaliation or discipline.
- BD maintains a Reporting/Grievance Mechanism through the [BD Ethics Helpline](#), a third-party led monitoring and oversight mechanism, available internally for BD associates and externally for all stakeholders. This system allows for anonymous

(where permitted by law) and/or confidential reporting of all matters of ethics concerns, including known or suspected human rights abuses both within BD and in our wider supply chain. It is available online or via telephone in a number of languages.

Our human rights due diligence process is based on the principles outlined in the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.

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 stringent. Newly acquired operations are included to ensure that they meet BD expectations and policy requirements.

BD has a Human Rights Due Diligence in the Supply Chain process (outlined above) to address this elevated risk within our supply base.

5. Training

BD takes steps to educate associates so they can identify modern slavery and other human rights abuses and take steps to eliminate them – both in our own operations and within our supply chain. These steps include:

- For our own operations, including our manufacturing sites, BD maintains robust Environmental, Health, and Safety, Ethics and Compliance, and Labor Standards programs that foster a culture of compliance within both the BD Code of Conduct and local laws, whichever are more robust. These programs include relevant trainings and guidance as appropriate. Additionally, all BD associates are trained annually on our BD Code of Conduct.
- BD provides a Modern Slavery and Human Trafficking training developed by a third party and administered online, annually. This course explains that forced labor, also known as modern slavery, still exists in the world and prompts the learner to consider ways of identifying, preventing and stopping it in the supply chain. It also trains BD associates on how to report known or suspected human rights abuses via our Ethics Helpline. This course is delivered to BD associates that interact directly and indirectly in sourcing, managing, advising on, or are otherwise involved with our suppliers, including but not limited to our leaders and our associates in the following departments: Environment, Health and Safety, Procurement, Supply Chain, Quality, R&D, Operations, Human Resources, and our Law Group.
- BD provides both internal and external trainings on the Expectations for Suppliers document
 - Internally, all procurement functions attend a required training around the Expectations for Suppliers when it is updated. This training detailed updates made to the document, implementation of the document, how BD implements the expectations laid out in the document, and how to report suspected non-compliance. This training is administered to Procurement associates as part of a larger Responsible Sourcing Training effort around topics like human rights and ESG risk.
 - For Suppliers, BD administers an online training on our Expectations for Suppliers to all suppliers as it is updated. These trainings include background on human rights risks, minimum standards suppliers must meet, and resources for suppliers to learn

more. This training also includes an overview of any updates made to the Expectations for Suppliers in the latest version.

- BD Responsible Sourcing Toolkit – this document was developed to help suppliers ensure compliance with the BD Expectations for Suppliers. It was developed as a training/resource document – as a starting point for suppliers who want to learn more. It provides access to external best practice, tools and resources, and external organizations to help suppliers track the changing practices in topics such as human rights, environmental sustainability, and risk. BD updates this document regularly to ensure suppliers have access to changing best practice.

BD strives to continuously improve its programs to ensure compliance with applicable laws and BD's ethical standards and to meet the expectations of our customers, our shareholders, our associates, our communities and other stakeholders. More information on our human rights practices can be found in our latest [Corporate Sustainability Report](#).