



Norway Transparency Act Disclosure for the financial year ended 30 September 2024

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 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 Norwegian Transparency Act requires Becton Dickinson Norway AS (BD Norway) to publish an annual human rights statement on the company's human rights due diligence, that includes information on the adverse impacts or significant human rights and decent working conditions risks the company has identified, measures the company has implemented or plans to implement to prevent or limit these risks, and the results or expected results of these measures. The following describes the company's effort in this regard. The company's due diligence and efforts on human rights are closely intertwined with the efforts, routines, and strategies on human rights at BD group level, and the statement will thus also account for group-level aspects.

About BD

BD Norway is a Norwegian subsidiary of the BD group. BD is a global medical technology company that is advancing the world of health by improving medical discovery, diagnostics and the delivery of care. This statement covers BD's programs and activities for our fiscal year ending on September 30, 2024 ("FY'2024").

In FY'2024, BD worked with approximately 33,000 suppliers globally that provide both goods and services. BD has over 1,200 critical suppliers that provide key materials, including plastics, glass, metals, textiles, electronic and mechanical subassemblies, and various paper, agricultural, biological, chemical and petrochemical products.

BD is headquartered in Franklin Lakes, NJ (USA) and is publicly listed. Main operations include the manufacturing and supply of medical technology.

In FY'2024, our operations spanned over 302 locations worldwide comprising of manufacturing, warehousing, administrative, and research facilities. We were comprised of approximately 74,000 associates located in 61 countries making BD a truly global organization.

BD Norway specific description, structure, operations



Per January 2024 BD Norway has 30 employees. Roles include sales, clinical and application specialist, field service engineer, medical affairs, pricing & tender specialist, technical sales representative, business development, etc. BD Norway's main office is located in Oslo. It also has a small office in Trondheim.

Governance

Human Rights management is embedded in our Integrated Supply Chain (including Operations, Supply Chain, Procurement and Sustainability & EHS) and human resources functions, to foster compliance with our policies prohibiting forced labor, human trafficking and modern slavery across all of our operations. The central Sustainability team is responsible for monitoring and coordinating responses to changes in Human Rights requirements and obligations. Our Responsible Sourcing team, located within our Procurement team, is responsible for developing and deploying our Human Rights Due Diligence efforts within our Supply Chain as well as wider ESG due diligence (more below)– a process which is overseen by the Responsible Sourcing Operating Committee which ultimately reports into our Chief Sustainability Officer and Chief Procurement Officer. As important matters relating to human rights issues arise, the Chief Sustainability Officer will brief the Enterprise Risk and ESG Committee (ERC) as needed; the ERC will brief the relevant Board committee and the full Board of Directors if applicable.

As BD is a global entity, we address Human Rights Due Diligence with a global perspective. With over 33,000 suppliers spread across the world, we have established our governance to account for the wide-reaching scope of our supply base; every supplier (both direct and indirect) is analyzed for risk and put through a due diligence process if they are deemed in scope for analysis. This process allows BD to address the highest risk of human rights and other related ESG risks, rather than addressing only the suppliers specific to BD Norway. This also ensures that goods produced by BD outside of Norway and imported into the country have already been assessed for these risks. From a regional or country perspective, we coordinate with local leaders with responsibility for human rights and ESG risk as needed; when a risk is identified, when deeper assessment is needed, when corrective actions must be put in place, etc. For BD Norway we have administered a geography specific risk assessment for suppliers to BD Norway, detailed further below.

BD Norway programs in place to monitor and advance human efforts include:

- Updated job description: The role of the Country General Manager Nordics now explicitly includes ensuring compliance with BD's policy commitments, particularly in human rights, labor rights, environmental protection, and anti-corruption.
- BD Norway supplier risk assessment: A geography-specific risk assessment is conducted on BD's (including BD Norway) suppliers. Suppliers identified as having elevated geographic or criticality risks are evaluated using our ESG desktop assessment tool. Based on these assessments, none of the suppliers currently represent an elevated risk.¹ Supplier Quality Programs: We conduct on-site supplier audits, where auditors are trained to identify and report known or suspected human rights and environmental risks or issues.

On a corporate level:

¹ BD's highest risk suppliers are generally found among our direct suppliers, i.e., those used in our manufacturing operations. Therefore, the lower risk profile of BD Norway's supply base can be attributed to the fact that BD does not manufacture in Norway. For more information on corrective actions assigned to high-risk suppliers, see the section below.



- BD is a member of the Pharmaceutical Supply Chain Initiative, focused on improving various ESG topics across peer supply chains. We participate actively in both the emissions reduction and human rights working groups.
- BD is a member of the BSR Human Rights Working group, a peer collective consisting of members across industries, focused on collaborating to implement best practice human rights efforts
- Diversity & Equity Council: This council sponsors events such as International Women's Day, Pride Month, a Learning Week focused on wellbeing, and cultural appreciation events. These initiatives reinforce BD's commitment to diversity and equity.

Measures to limit adverse impacts

Policies

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 - including 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.
- The BD Expectations for Suppliers which prohibits BD suppliers from using involuntary labor of any kind, including slave labor, indentured/debt labor, forced labor, or prison labor. This document also details minimum standards for environmental practices, governance, and other matters. Suppliers are required to adhere to these standards, which are also integrated into contract terms, purchase order terms, new supplier onboarding, and other procedures. This document is updated on a bi-annual basis to account for changing practices and suppliers are trained on each update.
- 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.

Implementation

The human rights commitments in the BD Human Rights Policy and the BD Code of Conduct are integrated across our operations through several 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 our operations.



Implemented policies geared toward ensuring that modern slavery do not exist in the BD workforce and across all our sites, operations, and subsidiaries (including BD Norway) include:

- We do not charge any of our associates recruitment fees and do not work with recruitment agencies that engage in this practice.
- We do not withhold identity documents, immigration documents or any other personal documentation of our associates.
- We encourage our associates to report, without fear of retaliation, any matters related to human trafficking, modern slavery, or any other human rights violations.
- We follow an established vetting process for new recruitment agencies prior to use.
- We provide BD associates with annual forced labor and human trafficking training, which is developed by a third party and administered online. This course is taken by any associate who interacts directly or indirectly with our suppliers, including associates who source, manage, and/or advise on supplier selection.
- We incorporate age verification into our new hire background screening process to ensure that child labor is not used.

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.

In FY2023, we completed a human rights salience assessment across our entire value chain to identify and prioritize human rights risks relevant to BD aligned with the United Nations Guiding Principles Reporting Framework criteria regarding scale, scope, remediability and likelihood. The assessment identified five salient Human Rights issues that we focused our efforts on in FY2024.

We further enhanced programs within own operations such as continuing to address potential occupational health and safety concerns with workers, and continuously reviewed U.S. BD facilities and end-disposal for environmental justice, waste and community impacts.

Our 2030+ ESG goal for a healthy workforce and communities, and programs such as our Good Jobs Strategy support decent work and economic growth. The Good Jobs Strategy provides a framework to offer attractive careers for our manufacturing associates by fostering a safe work environment, providing job satisfaction and a sense of belonging, and offering competitive healthcare and compensation, as well as training and development opportunities.

All our manufacturing and distribution locations complete an annual self-assessment and develop action plans for specific site improvements. Actions include additional training for leaders, enhanced communication mechanisms and career path programs. BD has taken steps to enhance working conditions, including investing in facility upgrades globally, rolling out manager, effectiveness training, enhancing communication mechanisms and career path programs, and making investments to ensure wage competitiveness. We've also promoted participation in our Associate Resource Groups (ARGs) to associates as a potential source of community and belonging and made participation more accessible to them. Currently, more than 90% of our manufacturing sites have at least one active ARG, and nearly 500 supply chain and operations associates belong to ARGs.

With a global supply chain of over 33,000 tier 1 suppliers, the depth and scope of our supply chain presents a risk- evaluating every supplier is a long-term process and the tools we have applied to



prioritize suppliers for evaluation have limitations. We have built in multiple stages of assessment in order to minimize this risk, but the vast number of suppliers to assess creates the possibility that we might not discover certain risks. We also recognize that a supply chain of this size increases the number of sub-tier suppliers in our network, thus increasing the chance of instances of modern slavery in our extended supply base. We mitigate these risks through due diligence processes that focus on prioritizing high-risk factors, such as a supplier's manufacturing location, both for existing suppliers and, as we update our pre-screening process, for new suppliers, and we have integrated supply chain mapping to help risk visibility further down in our supply chain.

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

For BD Norway, the scale and scope of the supply chain is much smaller. BD Norway does not manufacture directly and therefore has a much smaller, lower risk supply chain. We have evaluated suppliers to BD Norway through a geographic risk assessment and an ESG desktop review conducted by a third party. This evaluation is part of BD's broader corporate human rights and environmental due diligence efforts. Our initial risk assessment of the BD Norway supplier list indicates that this list has an average score of 'low' with each unique supplier representing low risk.

Even though our initial risk assessment for BD Norway represents low risk overall, we did prioritize some suppliers to BD Norway for the next phase in our due diligence process; ESG desktop audit. The results of these audits for suppliers to BD Norway did not result in any high risk for human rights abuses, and no corrective actions were required. The key risk that BD Norway faces in terms of human rights is that of our wider, BD corporate, supply chain – which is covered by our global approach to human rights due diligence, outlined above.

Finally, BD's Expectations for Suppliers (EFS) was first published in 2009 and since that time BD has worked to communicate the EFS to suppliers and confirm their compliance. This document details the minimum standards that all our suppliers must meet with regards to human rights, among other topics. Compliance has been evaluated primarily through written acknowledgements and through periodic audits based on the level of risk a supplier represents to ESG risk factors, as well as our own dynamic prioritization model. 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 and supplier terms and conditions, 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. This document is updated every other year and suppliers are trained on it after each update.

Training and Capacity Building

BD takes steps to educate associates and third parties 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, which includes a section on Human Rights and links to relevant policies such as BD Human Rights Policy.

- 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.

Due Diligence

Our human rights due diligence 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.

Within our supply chain, where our highest risk of slavery and human trafficking exists, suppliers are evaluated by a third party to understand Human Rights risk, which includes Modern Slavery risk factors, and environmental risk. BD recognizes that our highest risk suppliers are likely to be found in countries and industries cited for having the highest prevalence of human rights or environmental violations.



BD then prioritizes suppliers globally across all BD subsidiaries and BUs for the next level of assessment (via a third-party administered desktop assessment) based on this risk, criticality of the supplier to BD, and our internal dynamic model. The BD supplier risk assessment, which applies to all BD subsidiaries alike, including BD Norway, focusses on products sold by all subsidiaries rather than BD subsidiaries' specific suppliers. Our supplier risk assessment 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, and/or full in-person audits, depending on the level of risk identified, and suppliers are assigned corrective actions and given support in implementing corrective actions to reduce risk where identified.

These desktop audits address a variety of ESG topics, and BD focuses primarily on results of Labor and Human Rights assessment area as well as the Environment assessment area. As part of the assessment, suppliers are asked 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 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.

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

Additionally, in partnership with our risk monitoring supplier, using AI and machine learning, we've been mapping 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 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. 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.

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.

Results of Due Diligence



Based on the BD Human Rights Due Diligence process, BD Norway suppliers represent a low risk for human rights abuses. The key risk to BD Norway is the risk that BD faces globally in the size of our supply chain.

Over the course of our Due Diligence program, BD has globally assessed 2,079 suppliers through desktop assessments and mapped up to tier 5 of our supply chain for specific risks. Through this process we have identified several risks to our supply chain. The greatest risk we face is that of modern slavery, particularly regional modern slavery found past tier-1 in our supply chain. For this reason, we will focus further on our tier-n mapping efforts to build our upstream supplier network of human rights due diligence in the coming years.

Reporting/Grievance Mechanism

BD maintains the BD Ethics Hotline, a third-party led monitoring and oversight mechanism that is available both 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 (detailed in the BD Expectations for Suppliers and in the BD Code of Conduct and related trainings).

Results

Across all our programs that address Human Rights and Modern Slavery, we assess management effectiveness through periodic program reviews and have started to implement KPIs to track this work. 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.

In FY'2021 we established responsible sourcing KPIs that include:

1. We will strengthen engagement with supply chain partners on their labor and environmental practices and performance by completing desktop environmental/social audits for strategic, preferred and critical suppliers by 2023.
2. We will partner with strategic/preferred/critical suppliers to evaluate risk in Tier-2 by 2030.
3. We will seek to have 90% of total eligible spend reflected in completed supplier ESG focused desktop audit by 2025.

As of the end of FY'2024 we have completed a total of 2,079 supplier audits. To date, this represents 76 percent of our total in scope spend having completed a supplier scorecard. Of the suppliers who were assessed and indicated higher risk for human rights, 52% implemented corrective actions and reduced their risk for human rights abuses (52% of those who started the Fiscal Year with a high-risk rating successfully completed corrective actions and were reassessed at a lower risk).

We also report progress against these goals in our annual Sustainability Report, available at bd.com.

During the development of this statement, we engaged with each of the reporting entities covered by this statement and consulted with the entities we own or control. We discussed details of the reporting requirements and information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.



This statement was approved and adopted by the BD Board of Directors for Becton Dickinson Norway A/S on 24 March 2025.

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