

Purpose

BD will comply with the Conflict Minerals Rule and expects its suppliers and subcontractors to source responsibly, respect human rights and minimize adverse environmental impacts.

Background

On August 22, 2012, the final rule regarding the sourcing of Conflict Minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act was adopted by the U.S. Securities and Exchange Commission ("SEC"). The "Conflict Minerals Rule" refers to Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and imposes reporting requirements on publicly traded companies subject to SEC oversight, such as BD.

These companies are required to annually report on the origin of specified Conflict Minerals in the products they manufacture or contract to manufacture, if the minerals are contained in the product and necessary to its functionality or production.

The Conflict Minerals Rule intends to address the humanitarian crisis in and near the Democratic Republic of the Congo by reducing the illegal trade in 3TG that has benefitted the armed groups responsible for the violence in the region. As used herein and consistent with the Conflict Minerals Rule, "Conflict Minerals" or "3TG" are columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to the location of origin of the minerals or derivative metals. Due diligence and additional reporting is required if the 3TG originated from Conflict Affected Regions or if BD has reason to believe that the 3TG may have originated in a Conflict Affected Region and that they may not be from recycled or scrap sources. The first report was filed with the SEC by May 31, 2014, for activity within the 2013 calendar year, with the same reporting schedule to continue every year thereafter.

Scope

This Policy applies to all BD Associates and operations worldwide who are directly involved with purchasing decisions for raw materials used in our manufacturing processes.

Policy

BD is committed to ethical business practices and expects the same commitment from our suppliers. BD expects its suppliers and subcontractors to source responsibly, respect human rights, and not

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contribute to conflict. Without limiting the foregoing, BD expects that its suppliers and subcontractors will not knowingly source Conflict Minerals or 3TG from sources that directly or indirectly finance or benefit armed groups in the Conflict Affected Region. The current Conflict Affected Region is defined as the Democratic Republic of the Congo and its adjacent countries, which include Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

As part of our compliance efforts, BD will solicit declarations from our suppliers and subcontractors relating to the usage and origin of 3TG in their products,

In furtherance of this expectation and BD's obligations under the Conflict Minerals Rule, BD will conduct a reasonable country of origin inquiry and/or due diligence, in each case to the extent required by the Conflict Minerals Rule, on its supply chain to identify the origin of any necessary 3TG that are present in BD products. Applicable BD suppliers and subcontractors (as defined by BD's Supply Base Compliance group) will be expected to complete a declaration concerning the usage and source of any 3TG in the products supplied to us. As part of gathering the information for the declaration, applicable BD suppliers and subcontractors will be expected to conduct a reasonable country of origin inquiry and/or due diligence, as applicable, in accordance with the Conflict Minerals Rule and the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance"). BD has established processes and procedures that ensure that we receive responsibly sourced materials from our suppliers and subcontractors, including the following:

1. Require applicable suppliers and subcontractors to provide origin information on the 3TG contained in their products, and require that they report sourcing changes of these minerals to BD.
2. Assure through internal evaluation that new materials being considered for potential integration into existing or new BD products do not contain 3TG from sources that directly or indirectly finance or benefit armed groups in the Conflict Affected Region.
3. Execute the processes and procedures within BD that enable BD to monitor for, integrate, and comply with other regulations relating to 3TG, including preparing and filing with the SEC a Form SD and, if required, a Conflict Minerals Report, and, to the extent required, obtain a third-party audit of the applicable portions of our Conflict Minerals Report.

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4. Communicate to applicable suppliers and subcontractors our expectation that they:
 - a) adopt policies on responsible mineral sourcing that are consistent with this Policy;
 - b) establish due diligence frameworks and management systems that are consistent with the OECD Guidance; and
 - c) communicate an expectation to their direct and indirect suppliers that they do the same.

In cases where suppliers or subcontractors are found to not comply with our Policy, we intend to encourage them to source responsibly. Where these efforts fail or we believe that further engagement with a supplier or subcontractor is inappropriate, we will re-evaluate our business relationship.



Any questions concerning this Policy
should be directed to:
conflictminerals@bd.com

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Approval

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Revision Log

Rev	Description of Changes	Changed By	Approved By	Date
2.0	Reviewed – restructuring of the policy with minor changes to the content	Integrated Supply Chain – EHS & Sustainability	Chief Executive Officer	7/1/2024
1.0	New	Office of Global Sustainability	Chief Executive Officer	6/21/2016