

BD Modern Slavery and Human Trafficking Statement 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: 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 certain organizations carrying out business in the United Kingdom to publish a statement regarding human trafficking and modern slavery. The following describes BD's efforts in this regard.

1. Organsation, Business Structure and Supply Chains

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 operated three worldwide segments: BD Medical, which included Medication Management Solutions, Medication Delivery Solutions, and Pharmaceutical Systems; BD Life Sciences, which included Biosciences and Integrated Diagnostic Solutions; and BD Interventional, which included Surgery, Peripheral Interventional and Urology and Critical Care.

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 organisation.

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.

2. Policies in Relation to Modern Slavery and Human Trafficking

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 <u>BD Code of Conduct</u> 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 <u>BD Global Human Rights Policy</u> 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.
- <u>BD Expectations for Suppliers (updated biannually)</u> prohibits the use of involuntary labour of any kind, including slave labor, indentured/debt labour, forced labour, or prison labour, prohibits child labour, 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 <u>BD Global Speak Up Policy</u> 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.

3. Due Diligence Processes

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.

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

BD then prioritizes suppliers 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. 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 Labour 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.

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. BD is implementing this integrated supply chain mapping (to tier-5) against our critical to healthcare products to better identify if known actors exist within our supply chain or to evaluate risk based on a specific country/industry or issue.

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.

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.

4. Assessing and Managing Risk

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.



Implemented policies geared toward ensuring that modern slavery do not exist in our workforce and across all or sites, operations, and subsidiaries 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, remendability 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 of 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 sheer size 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 are not infallible. We have built in multiple assessment stages to



minimize this risk, but the vast number of suppliers to assess represents a chance that we might not discover a risk. 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 supply base. We mitigate these risks through due diligence processes that focus on high-risk geographies and prioritization of assessments for higher risk (as identified through ai intelligence, risk analysis, experience of supply chain management, etc.) suppliers, both for existing suppliers and, as we update our pre-screening process, for new suppliers.

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

Suppliers are analysed, via a third party, against geographic or location risk 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, BD employees are trained to report concerns around Code of Conduct violations to the BD Ethics Hotline. BD suppliers are also encouraged (as part of our Expectations for Suppliers) to report concerns through the same process. 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.

BD's Expectations for Suppliers document (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 in addition to other topics. Compliance is evaluated through written acknowledgements and periodic audits based on the risk level. BD includes language in our contracts, purchase orders, supplier terms and conditions, and supplier on-boarding process, among others, that requires its suppliers to represent, warrant, and/or certify that they comply with the EFS and all relevant laws (including labour laws) 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.

5. Measurement and Effectiveness of Steps Taken

Across all of 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 under which:

- 1. We will strengthen our 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.

6. Training on Modern Slavery and Human Trafficking 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 training and guidance as appropriate. Additionally, all BD associates are trained annually on our BD Code of Conduct and all other BD Policies.
- 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
 - o 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.
 - o For Suppliers, BD administers an online training on our Expectations for Suppliers to all suppliers as it is updated. These training courses 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 document in the latest version.
 - o 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.



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 from Bard Limited, Becton Dickinson Infusion Therapy UK, and Becton, Dickinson U.K. Limited on 6 February 2025

Mike Fairbourn

Vice President and General Manager UK & Ireland

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 U.K. Limited, and is signed by the Vice President and General Manager UK & Ireland on behalf of these entities.