



BD Expectations for Suppliers

2023



BD

Advancing the
world of health™

Suppliers,

People around the world count on us to deliver on our Purpose, *advancing the world of health™*. We are proud of and humbled by our important role in improving medical discovery, diagnostics and the delivery of care.

How we deliver on our Purpose is as important as what we accomplish together, and our suppliers play an integral role in helping BD realize its Purpose.

With unwavering commitment to our culture and values, we follow the simple principle: **“We do what is right.”** This guides every decision we make, every action we take, and every interaction we have—with our associates, our customers, our business partners, our communities and our suppliers. This also drives our commitment to addressing a wide range of challenges facing our industry, society and the planet.

We look to our suppliers to match our efforts in addressing these global challenges. This BD Expectations for Suppliers document outlines specific standards for suppliers regarding labor and workplace responsibility, environmental stewardship, ethical practices, quality and governance. BD expects all suppliers to fully comply with these standards and, if requested, to demonstrate their compliance.

BD is committed to developing partnerships with suppliers that meet and exceed the expectations laid out in this document. We believe that we can accomplish more in partnership than as individual organizations. BD will continue to seek best practices from our suppliers to help improve our collective programs. We remain committed to transparency and will report our progress annually through our **environmental, social, and governance (ESG) report** and make key policies available on our website.

Best practices, regulations and standards within the subjects covered in the Expectations for Suppliers are constantly changing. As a result, BD will update the Expectations for Suppliers document to remain consistent with changing practices and regulatory landscape; it should be viewed as a living document meant to encourage our suppliers to seek out and implement best practices on these topics.

Thank you for your partnership on these important aspects of how we do business. Should you have any questions about the Expectations for Suppliers document, please reach out to your Global Procurement partner or at BDResponsibleSourcing@bd.com.



Maureen Mazurek
Chief EHS, Sustainability Officer



Kevin Nelson
Senior Vice President, Global Supply Chain &
Chief Procurement Officer



Setting expectations for excellence

We center our Expectations for Suppliers (EFS) upon our Purpose—*advancing the world of health*™—and tie the EFS to our business strategy. Our business strategy addresses a wide range of challenges in our industry, while advancing environment, social and governance topics.

Becton, Dickinson and Company (BD) seeks to develop relationships with suppliers who demonstrate that they are advancing the values set forth in this EFS as well as our core values that serve as the BD moral compass: **“We do what is right.”** We aim to work collaboratively with suppliers that both share our values and can help us effectively serve our customers. We expect all of our suppliers to comply with the expectations laid out in this document. This is a requirement for doing business with BD.

BD defines a supplier as any person, company, entity or organization that supplies BD with goods or services*; either directly or through another supplier.

*Services include the distribution of our goods.

BD may request regular updates on supplier progress towards meeting the expectations set forth in this document and reserves the right to audit suppliers (such audits can range from informal questionnaires to in-person audits) to assure compliance with these expectations. Suppliers should hold their own supply chain to similar expectations.




Suppliers are required to comply with the expectations laid out in this document and to notify BD in a reasonable time if they are not in conformance. In the event of non-compliance, BD may require corrective actions and/or remediation or may terminate contract and purchase orders and cease working with the supplier.

Notifications should be made via the procurement email: BDResponsibleSourcing@bd.com.

BD will update the EFS from time to time to stay current with developments both inside and outside of BD. The latest version will be published at bd.com.

Our Code

The BD Code of Conduct (Code) sets the foundation for behavior at BD. Our value statement, **“We do what is right”** is the cornerstone of the Code.

[Our Code](#) 
[BD Values](#) 
[Cultural priorities](#) 

The BD Purpose and Code guide the behavior of all BD associates in all aspects of business, including relationships with suppliers.

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Social Responsibility

1.1 Child Labor

The minimum acceptable working age is 15 unless a higher minimum working age is required by applicable law. Workers exposed to conditions that are hazardous to health and safety must be at least 18 years old and must be provided with the appropriate personal protective equipment. International Labor Organization (ILO) standards should be adhered to, focusing specifically on eliminating the worst forms of child labor.

1.2 Forced Labor and Human Trafficking

All workers may commence and/or end an employment relationship with a supplier of their own free will. Suppliers shall not use involuntary labor of any kind, including slave labor, indentured/debt labor, forced labor or prison labor for profit-making enterprises. Suppliers shall not engage in any form of human trafficking. Suppliers shall not require monetary deposits or retain any identity papers or work permits as a condition of work, and employees must be free to leave their employment after reasonable notice, if such notice is required by local law or regulation. Suppliers shall provide an employment contract or work document, where required by law, in a language understood by the worker.

1.3 Workplace and Worker Housing

The supplier shall provide all workers with access to a safe and healthy workplace, including but not limited to, accessible and clean toilets, safe drinking water, sanitary facilities for food storage, and adequate fire exits. Suppliers shall have a worker health and safety program addressing physical, chemical, and biological hazards in the workplace.

Should the supplier provide housing for workers, the housing provided or arranged for workers must be safe, provide sufficient egress in case of an emergency, and meet the host country's housing and safety standards.

1.4 Equal Opportunities

The supplier shall provide equal opportunity to all applicants and workers without regard to race, religion, age, gender, gender identity or expression, sexual orientation, caregiver status, national origin, ancestry, disability, social class, veteran status, caste or any other status protected under applicable law.

Social Responsibility

1.5 Supplier Inclusion and Diversity Program

The supplier shall have an active supplier diversity program, addressing at a minimum their U.S.-based business, and to support the communities where BD operates by engaging with both small businesses and diverse-owned businesses as set forth above.

Additional information about our Supplier Diversity Program can be found on our [website](#).



1.6 Abuse

Workers shall not be subjected to corporal punishment, mental coercion, physical contact, sexual coercion, verbal abuse or the use of gestures, language, or graphic materials that are threatening, abusive or exploitive.

Social Responsibility

1.7 Work Hours and Compensation

Work hours and wage payments (including the timing of such payments) shall comply with applicable laws and standards. Overtime shall be administered and compensated fairly and in accordance with applicable laws. All wages and fringe benefits must be clearly defined and communicated in accordance with applicable law.

1.8 Health and Safety

The supplier shall provide a healthy and safe work environment. At a minimum, suppliers shall have a health and safety policy and formal health and safety programs in place that proactively address fire prevention, emergency preparedness and response, accident prevention and injury/illness reporting. Supplier's facilities shall have fire and safety equipment, i.e. fire detection and evacuation alarms, emergency lighting and illuminated exit signs.

The supplier shall systematically evaluate all risks and implement measures that address the hazards following the hierarchy of control: elimination of hazards through engineering controls; provision of personal protective equipment where needed and/or implementation of administrative controls. A comprehensive training program should communicate health and safety policy programs and procedures to safely operate the process and ensure the well-being of employees, visitors to the site and any on-site contractors.

The supplier is expected to promote the health and safety of their workers and operate in a manner that is consistent with the BD Environmental, Health and Safety Policy.



1.9 Freedom of Association

The supplier shall support the freedom of association and the rights of workers and employers to bargain (or not bargain) collectively, and they shall not discriminate against workers who exercise such freedom and related rights.

Social Responsibility

1.10 Access

The supplier shall not engage in unlawful evictions or unlawful deprivations of land, forest or water.

1.11 Recruitment

The supplier and their agents shall not charge workers recruitment fees of any kind. Recruiters must comply with the local laws of the country in which the recruiting takes place.

1.12 Due Diligence

The supplier shall exercise reasonable efforts to ensure that they, and their suppliers, remain in compliance with the expectations outlined in this document.

1.13 Grievance Mechanisms

The supplier shall establish mechanisms to enable employees to report concerns. This can be through person of trust systems, committees, internal or external hotlines, or a whistleblower system. Employees should be able to report concerns without threat of reprisal, intimidation or harassment.

Environmental Stewardship

2.1 Regulatory Compliance

The supplier shall comply with all applicable environmental laws and regulations relating to locations in which they operate and countries where they place products on the market.

The supplier shall operate in a way that is consistent with the BD Environment, Health and Safety Policy.

The supplier shall not cause soil contamination, water or air pollution, noise emission or excessive water consumption which:

- Significantly affects the environmental basis for the preservation and production of food
- Deprives any person of access to safe drinking water
- Impedes any person's access to sanitary facilities
- Harms the health of a person

2.2 Life Cycle Management

The supplier will strive to optimize the environmental performance of their products and operations, taking a life cycle approach for all products, processes and/or services.

In addition to reducing greenhouse gas (GHG) and other air emissions, the production of waste and the consumption of water and energy in their operations, suppliers are encouraged to assess the environmental footprint across the lifecycle of their products and take reasonable steps to reduce the environmental footprint of their products.

By joining the UN Race to Zero, via the Business Ambition for 1.5°C and Science Based Targets initiative (SBTi), BD has committed to setting science-based targets. As a large share of our GHG emissions are produced in our upstream supply chain, we will actively engage and collaborate with our suppliers to reduce these emissions. Suppliers shall systematically track and document Scope 1 and 2 GHG emissions as a minimum, plus Scope 3 emissions where feasible.

Additionally, the supplier is encouraged to:

- Implement methods to minimize energy consumption and greenhouse gas emissions wherever possible and set science-based reduction target for Scope 1, 2 and 3 GHG emissions
- Publicly report Scope 1, 2 and 3 emissions and performance against set targets. Suppliers are expected to publicly report their emissions where required by law

Environmental Stewardship

2.3 Operational Emissions and Discharges

The supplier shall systematically evaluate all environmental emissions, waste streams and effluents and have programs in place to minimize impacts wherever possible. Suppliers will measure and report water and air discharges into the environment, in accordance with applicable country, regional and local laws and legal requirements. Suppliers will properly manage and store all chemicals and waste to prevent any accidental spills or release into the environment.



2.4 Waste Management

The supplier shall strive to reduce, reuse and recycle material within their manufacturing operations. Recycling processes will employ closed-loop recovery systems wherever possible to achieve optimal use of a material or product. Waste (including hazardous waste) will be properly handled, stored and disposed of in accordance with applicable laws and local regulations. Suppliers should consider waste reduction in product and packaging wherever possible and consider reverse logistics where appropriate.



2.5 Chemicals of Concern and Producer Responsibility

The supplier shall have adequate systems in place to identify and disclose to BD all chemicals in their packaging, products and product sub-components. At a minimum, the supplier will disclose to BD those chemicals that are regulated in the regions where they are being used, and/or on the BD Materials of Concern (MoC) list available [here](#).

The supplier shall make every effort to eliminate or reduce materials of concern from their products and or packaging (where technically feasible). Materials of special interest to BD include but are not limited to: CMR (carcinogenic, mutagenic or toxic for reproduction), ED (endocrine

Environmental Stewardship

2.5 Chemicals of Concern and Producer Responsibility (continued)

disruptors), BFR (brominated fire retardants), phthalates, PFAS (per- and polyfluoroalkyl substances), heavy metals and (very) persistent, (very) bioaccumulative and toxic materials (PBT/vPvB) as well as PVC. See the BD MOC list (available [here](#)) for details.

The supplier shall also meet extended producer responsibility (EPR) regulatory requirements, provide product and packaging data to BD on request and reduce, reuse and recycle product and packaging waste.

Chemicals of Concern/Disclosure regulations include but are not limited to:

- **E.U. Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation**
- **E.U. Restriction of Hazardous Substances (RoHS) Directive**
- **Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 'Conflict Minerals'**
- **E.U. Biocidal Product Regulation (BPR)**
- **California Safe Drinking Water and Toxic Enforcement Act 1986 (Cal Prop 65)**
- **California Cleaning Product Right to Know Act**
- **U.S. Toxic Substances Control Act (TSCA)**
- **Global Harmonisation System (GHS)**

Extended Producer Responsibility regulations include but are not limited to:

- **E.U. Waste Electrical and Electronic Equipment (WEEE) Directive**
- **E.U. Battery Directive**
- **E.U. Packaging and Packaging Waste Directive**

2.6 Transportation Logistics

The supplier shall work with BD team to optimize transportation strategies and solutions in order to minimize the environmental footprint, while optimizing costs, of all shipping activities. This includes consideration of transportation modes and distances as well as packaging material types and quantities.

Ethical Practices

3.1 Fair Dealing

The supplier is expected to deal fairly with their own suppliers in accordance with ethical business practices.

3.2 Conflicts of Interest

BD associates, family members of BD associates, or individuals who have close personal relationships with a BD associate, cannot work for a BD supplier (including employment, consulting, or other service relationship) or have an investment or other financial interest in a BD supplier, unless such potential or actual conflicts of interest are disclosed to, and addressed by, BD. Any such actual or potential conflict of interest must be disclosed by the supplier to the BD Ethics Office at EthicsOffice@bd.com for review and determination by BD. Only the BD Ethics Office is authorized to issue a determination on behalf of BD regarding whether a matter constitutes a conflict of interest and whether the conflict can be effectively managed through mitigating measures. Individual managers, Human Resources, or other representatives of BD are not permitted to “approve” or “waive” actual or potential conflicts of interest for BD associates, agents, or suppliers.

3.3 Supplier Relations

BD does not accept, and suppliers shall not offer, inappropriate gifts or entertainment to any BD associate.

3.4 Compliance with Applicable Laws and Anti-Corruption

The supplier shall comply fully with all applicable laws including but not limited to all applicable international trade laws affecting the transfer of goods, services, software and technology across national borders (including economic sanctions, export controls and antiboycott regulations), all applicable healthcare laws and all applicable anticorruption laws. Suppliers must not be ineligible to participate in the U.S. federal healthcare programs or U.S. federal procurement or non-procurement programs. Suppliers must also not be on the U.S. General Services Administration’s List of Parties Excluded from Federal Programs or the USHHS/OIG List of Excluded Individuals/Entities.

The supplier shall not bribe any public official or private person or participate in other illegal inducements in business or government relationships. Suppliers and any third-party conducting business on behalf of BD must conduct their activities in full compliance with all applicable anti-bribery and anti-corruption laws in the countries where BD operates, as well as laws with cross-border implications, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

Ethical Practices

3.4 Compliance with Applicable Laws and Anti-Corruption (continued)

As such, in connection with any BD relationship, the supplier shall strictly prohibit bribes, kickbacks, illegal payments, and any other offer of items of value to secure an improper business advantage, whether provided directly or through a third-party, such as a distributor, customs broker, or other agent; and avoid any other action that could inappropriately influence the medical decisions of healthcare professionals and the purchasing decisions of entities that buy BD products and services, including healthcare professionals, government regulators and inspection authorities. Any relationship between suppliers and public officials must be in strict compliance with the rules and regulations to which they are subject (i.e., any applicable rules or regulations in the particular country relating to public officials or that have been imposed by their employer). Any benefit conveyed to a public official must be fully transparent and properly documented.

Suppliers should provide appropriate anticorruption and ethics training to their associates and their suppliers, and training records shall be kept in compliance with all applicable anti-bribery and anti-corruption laws in the countries where BD operates, as well as laws with cross-border implications, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

3.5 Documentation

The supplier shall maintain documentation and accurate books and records necessary to demonstrate compliance with applicable anticorruption laws and regulations. This documentation shall be made available to BD (or the appropriate BD-identified third-party assessor) for review upon the request of BD.

3.6 Prohibited Persons

Neither the supplier nor any related person may appear on any list of prohibited persons maintained by the United States or other applicable government or government authority (prohibited lists), including the list of “Specially Designated Nationals and Other Blocked Persons” maintained by the U.S. Department of Treasury, and the “Denied Persons List” maintained by the U.S. Bureau of Industry & Security.

3.7 Confidentiality

The supplier shall safeguard and not disclose or use BD confidential and proprietary information. The supplier shall also ensure that BD, worker, customer and patient privacy rights are protected.

Ethical Practices

3.8 Privacy

The supplier shall (i) comply with all privacy laws applicable to BD data; (ii) respect the privacy of employees and others whose personal data they have access to, by complying with applicable laws when collecting, sharing, and storing personal data about employees, business partners, patients, healthcare professionals, consumers and others, such as birth dates, addresses, and financial, medical, and other data; (iii) collect personal data only for legitimate business purposes; (iv) share personal data only with those who are allowed access, and protect in accordance with both BD and supplier's security policies; (v) retain only for as long as necessary; (vi) contractually obligate third parties with access to personal data to protect it; and (vii) safeguard all personal data provided to them by implementing sufficient security protections.

The supplier must notify BD of suspected or actual breaches of personal data immediately and no later than 24 hours after discovery of either a suspected or actual breach by providing formal notice under the notice provision of any agreement with BD and by emailing Privacy@bd.com. In any case of a known or suspected breach where an agreement does not contain a notice provision, suppliers are expected to send notice of any known or suspected breach of personal data to Privacy@bd.com, following the same time frame.

3.9 Animal Welfare

The supplier shall strive to ensure that all animals are treated humanely and with the highest standards of animal welfare. Any animal testing performed by a supplier on behalf of BD must be performed under the federal animal regulations and guidelines. Consideration of the 4Rs of Laboratory Animal Research include:

- Replace animals with validated in vitro methods if possible
- Reduce the numbers of animals used
- Refine procedures to minimize pain and distress
- Evaluate retirement options once an animal has completed scientific study needs

Alternative means of testing should be used whenever scientifically valid and acceptable to regulators. The supplier may be audited by the BD Attending Veterinarian and/or delegated to ensure animal welfare standards and compliance under the [Global Humane Handling, Care and Use of Animals Policy](#).

Quality

4.1 Quality Management System

The supplier that provides materials, products and quality impacting services to BD shall have an effective quality management system that complies with the requirements of applicable notified bodies and regulatory agencies such as ISO 9001, ISO 13485, and FDA/MDSAP.

4.2 Quality Requirements

The supplier shall adhere to BD specifications, supply agreements, quality agreements, purchase orders and other contractual obligations. The supplier shall establish and maintain equipment, utilities and facilities used in production, storage and delivery of products. The supplier shall have controls with mitigation plans in place to handle potential risks. The supplier shall continuously improve quality, raw materials, components, products, processes and systems.

4.3 Change Control

The supplier shall maintain ongoing and timely communication and collaboration to ensure BD is aware of changes. This includes communication with sufficient notice period of any significant changes that the suppliers organization may face that could affect BD product quality or supply continuity. The supplier shall obtain written approval from a BD representative prior to making any changes to specifications (this may include, but is not limited to, changes in manufacturing processes, material, color, changes that impact form, fit or function of the part, change of registration status, supply chain changes, and location, among others).

These changes should be communicated through the [BD Supplier Change Request Portal](#).

4.4 Complaints and Non-Conformances

The supplier shall have a documented process to investigate and respond in a timely manner all quality-related complaints and cooperate with investigations for any issues associated with the finished product or raw materials. The supplier shall have a documented process to handle non-conforming product and materials and shall notify BD of any non-conforming product shipped to BD. The supplier shall document any rework, refurbishment, or reprocessing activities as well as formally document and obtain approval for deviations from any standard and documented practices. The supplier shall notify BD of any recall resulting from failure of product or raw material and of any regulatory action for adverse event, recall, correction, etc.

4.5 Sub-tier Suppliers

The supplier shall have a management system for vendor selection, qualification, approval, and performance management of its suppliers and will ensure materials and components from its suppliers conform to specifications.

Governance and Compliance

5.1 Management Systems

Supplier will have appropriate management systems and processes in place to implement and monitor compliance with these expectations.

5.2 Supply Disruption and Risk Management

The supplier shall routinely identify, prioritize, and mitigate risks that may disrupt supply continuity. The supplier shall also partner with BD in communicating, prioritizing, and mitigating any BD-identified potential risks.

5.3 Documentation

The supplier shall maintain documentation necessary to demonstrate conformance with these risk mitigation and supply chain continuity expectations and compliance with applicable laws and regulations, including privacy. This documentation shall be made available to BD (or the appropriate BD-identified third-party assessor) for review upon the request of BD.

5.4 Transparency

The supplier shall protect BD assets and information and be transparent about their operational, financial and cybersecurity health as it relates to their continuity of supply and risk mitigation.

The supplier should provide transparency about environmental, social and governance issues that are relevant to their organization, with the level of external reporting relevant to the size of their organization.

5.5 Information Security

Suppliers/third parties who manage, operate, administer, process, or access BD information and assets, regardless of where the information and assets reside or where they are accessed from, are subject to the BD Information Security requirements in their contractual terms and conditions. Suppliers to BD shall immediately notify BD of any potential information security incidents involving any BD data or BD systems and shall cooperate in any investigation in connection with such incidents, in accordance with any such terms set forth in their contract.

In addition, suppliers to BD shall pursue third-party attestations or certifications, such as ISO 27001 or SOC 2 Type 2, and provide the respective annual controls reports to BD as a means of verifying their information security environment.

Governance and Compliance

5.6 Audits

BD or its designee may audit the facilities and records of supplier to assure supplier's conformance with the requirements set forth in this EFS. Upon reasonable notice to supplier, supplier shall make such facilities and records available to BD and its designee, and supplier shall reasonably cooperate with BD and its designee in such audits. Supplier shall immediately notify BD of any proposed or unannounced regulatory or government audit or inspection, and will communicate such notice to the relevant points of contract for the affected products/services. The supplier shall conduct periodic internal audits of the relevant manufacturing/service facilities for quality, labor practices, environment health and safety practices, and any other relevant areas. BD may periodically distribute surveys, desktop audits, and other online assessments to verify compliance with this EFS in place of, or in addition to, such audits, and supplier shall reasonably cooperate and participate in these efforts.

5.7 Miscellaneous

BD assumes no duty or obligation to audit or review suppliers' compliance with these expectations and assumes no liability or responsibility for the actions or omissions of suppliers. Any audit by BD will not relieve the supplier of their obligation to comply with this EFS.



Reporting Noncompliance

To report noncompliance with this EFS document, contact the confidential BD Ethics Helpline in the U.S. at 800.821.5452 or via our anonymous [online reporting tool](#). If contacting the BD Ethics Helpline from outside the U.S.:

- Visit the [AT&T international toll-free dialing guide](#).
- Select your country from the drop-down menu.
- Dial the corresponding AT&T Direct Access Number on your telephone. An English-language voice prompt or an AT&T operator will ask you to enter the toll-free number you are calling.
- Enter the BD Helpline number: **800.821.5452** (do not dial 1 in front of this number)
- You will be connected to an English-speaking helpline operator (please indicate at this point if you need interpretation assistance and in what language).



Resources

Documents that may support supplier in connection with these expectations are set forth below:

- [BD Code of Conduct](#)
- [BD ESG Report](#)
- [BD Corporate Safety and Environmental Policy](#)
- [BD Human Rights Policy](#)
- BD Responsible Sourcing Toolkit (reach out to BDResponsibleSourcing@bd.com to verify supplier status and get access - access provided only to current BD suppliers)
- [BD Investor Relations](#)
- [Social Accountability International SA8000](#)
- [UN Universal Declaration of Human Rights](#)



More information

For additional information concerning EFS, suppliers should contact the Responsible Sourcing team at BDResponsibleSourcing@bd.com

BD, Franklin Lakes, NJ, 07417, U.S.

[bd.com](https://www.bd.com)

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BD

Advancing the
world of health™