



BD Expectations for Suppliers

April 2021



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 promise 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, human rights and governance. BD expects all of our suppliers to fully comply with these standards and, if requested, be able 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 share information about our own efforts on human rights and sustainability and will 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 sustainability 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 our Expectations for Suppliers document to remain consistent with changing practice; it should be viewed as a living document meant to encourage our suppliers to seek out and implement best practices around 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.



A handwritten signature in black ink that reads "Ellen Kondracki".

Ellen Kondracki
*Vice President Sustainability &
Environment, Health and Safety*



A handwritten signature in black ink that reads "Kevin Nelson".

Kevin Nelson
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 social responsibility and promoting environmental stewardship.

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 value that serve as the BD moral compass: **“We do what is right.”** While 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 for suppliers laid out in this document. This is a requirement of 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.

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

Suppliers are expected to comply with the expectations laid out in this document and to notify BD in a reasonable time period if they are not in conformance with applicable expectations.

Notifications can be made via the procurement email: Global_Procurement@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/sustainability.

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.

*Services include the distribution of our goods.

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1.0 Labor and Workplace 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.

1.2 Forced Labor and Human Trafficking

All workers may commence and/or end an employment relationship with a supplier at 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

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 are expected to 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 meet host country housing and safety standards.

1.4 Equal Opportunities

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

Labor and Workplace Responsibility

1.5 Supplier Inclusion and Diversity Program

Suppliers are expected to have an active supplier diversity program, addressing at minimum their U.S.-based business, and to support the communities where BD operates by engaging with small and diverse 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.

1.7 Work Hours and Compensation

Work hours and wage 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.

Labor and Workplace Responsibility

1.8 Health and Safety

Suppliers shall provide a safe and healthy working environment. At a minimum, suppliers should have a health and safety policy and formal health and safety programs in place that proactively address fire prevention, accident prevention and reporting. The emergency preparedness and response plan should include fire and life safety equipment, i.e., fire detection and evacuation alarms, emergency lighting and illuminated exit signs.

Suppliers should systematically evaluate all risks and implement measures that address the hazards following the hierarchy of control: elimination of hazard 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.

Suppliers are expected to promote the health and safety of their workers and operate in a manner that is consistent with the BD Safety and Environment Policy.



1.9 Freedom of Association

Suppliers shall support the freedom of association and the rights of workers and employers to bargain collectively.

1.10 Recruitment

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

1.11 Due Diligence

Suppliers shall exercise reasonable efforts to remain, and ensure that its own suppliers remain, in compliance with the expectations outlined in this document.

1.12 Grievance Mechanisms

Suppliers should 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.

2.0 Environmental Stewardship

2.1 Regulatory Compliance

Suppliers shall comply with all applicable environmental laws and regulations relating to locations in which they operate.

Suppliers shall operate in a way that is consistent with the BD Safety and Environmental Policy.

2.2 Life Cycle Management

Suppliers will strive to optimize the environmental performance of their products and operations, taking a life cycle approach for all products, processes and/or services. Suppliers should actively work to reduce the consumption of energy, water and other nonrenewable natural resources.

2.3 Emissions and Discharges

Suppliers should 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.



2.4 Waste Management

Supplier will strive to reduce, reuse and recycle material within their manufacturing operations. Recycling processes will employ closed-loop 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 law and local regulations. Supplier's products will similarly aim to reduce waste (for instance in packaging) wherever possible and consider reverse logistics where applicable.



Environmental Stewardship

2.5 Chemicals of Concern and Producer Responsibility

Supplier will have adequate systems in place designed to identify and disclose to BD all chemicals in their products and product sub-components, as well as meeting extended producer responsibility requirements, or as a minimum, those that are regulated by the governments and/or competent authorities in the regions where they are being used, and/or are on the BD Materials of Concern (MOC) list available [here](#).

Materials of special interest to BD include but are not limited to: CMR (carcinogenic, mutagenic or toxic for reproduction), ED (endocrine disruptors), BFR (brominated fire retardants), phthalates, heavy metals and (very) persistent, (very) bioaccumulative and toxic materials (PBT/vPvB) as well as PVC and EPS (expanded polystyrene). See BD MOC list (available [here](#)) for details.

These 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](#)

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 \(GHS\)](#)

2.6 Transportation Logistics

Supplier shall optimize transportation strategies in order to minimize the environmental footprint of all shipping activities. This includes consideration of transportation modes and distances as well as packaging material types and quantities.

3.0 Ethical Practices

3.1 Fair Dealing

Suppliers are expected to deal fairly with their own suppliers in accordance with ethical business practices.

3.2 Conflicts of Interest

BD associates or members of their immediate family cannot work for BD suppliers unless such potential or actual conflicts of interest are disclosed and addressed.

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 Anticorruption

BD expects supplier to 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 nonprocurement 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.

Suppliers 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 antibribery and anticorruption 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.

As such, in connection with any BD relationship, suppliers must 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.

Ethical Practices

3.5 Prohibited Persons

Neither supplier nor any related person 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.

3.6 Confidentiality

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

3.7 Privacy

BD suppliers shall (i) respect the privacy of employees and others whose personal information they have access to, by complying with applicable laws when collecting, sharing and storing personal information about employees, business partners, patients, healthcare professionals, consumers and others, such as birth dates, addresses and financial, medical and other information; and (ii) collect personal information only for legitimate business purposes, (iii) share only with those who are allowed access, protect in accordance with both BD and supplier’s security policies, (iv) retain only for as long as necessary, and (v) contractually obligate third parties with access to personal information to protect it. Suppliers must notify BD of suspected or actual breaches of personal information as soon as possible but always within 48 hours of discovery of either a suspected or actual breach by providing formal notice under the notice provision of any agreement with BD and by email to 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 information to privacy@bd.com, following the same timeframe.

3.8 Animal Welfare

Where relevant, 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 an approved Institutional Animal Care and Use Committee (IACUC) per USDA Guide for the Care and Use of Animals protocol and always with consideration of the 4 Rs of laboratory animal practice: Replace animals with validated in vitro methods if possible; Reduce the numbers of animals used; Refine procedures to minimize pain and distress; and 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. Suppliers may be required to provide an animal care program description upon request of BD and may be audited under the **BD Global Humane Handling, Care and Use of Animals Policy**.

4.0 Governance

4.1 Supply Disruption and Risk Management

Suppliers should identify, prioritize and mitigate risks that may disrupt supply continuity.

4.2 Documentation

Supplier shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable laws and regulations. This documentation must be made available for BD review upon request.

4.3 Transparency

Suppliers are encouraged to 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.

Suppliers are encouraged to join the Carbon Disclosure Project and voluntarily report information about their emissions and management of risks related to climate change and water, and forest stewardship if applicable.

4.4 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 supplier.



5.0 Reporting Noncompliance

Reporting noncompliance

To report noncompliance with these EFS, 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: <https://www.business.att.com/collateral/dial-guide.html>
- 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).



6.0 Resources

Resources

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

- **BD Code of Conduct**
- **BD Sustainability Report**
- **BD Corporate Safety and Environmental Policy**
- **BD Human Rights Policy**
- **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 ResponsibleSourcing@bd.com.

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

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

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