

December 2020

BD AUS Modern Slavery and Human Trafficking Statement for the financial year ending 30 September 2020.

**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 take personal responsibility
- We anticipate and address the challenges of patients and customers globally
- We innovate and improve continuously
- We respect, collaborate, challenge and care about each other

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 AUS Modern Slavery Act of 2018 requires certain organizations carrying out business in Australia to publish a statement regarding modern slavery. The following describes BD's efforts in this regard.

### **Organization, 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, 2020. In FY'2020, BD operated three worldwide segments: BD Medical, which included Diabetes Care, Medication Management Solutions, Medication and Procedural 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'2020 our operations spanned over 120 locations worldwide, including over 85 directly-owned manufacturing and supply chain operations. We were comprised of more than 65,000 associates serving over 190 countries, making BD a truly global organization. In FY'2020, BD worked with approximately 30,000 suppliers globally that provide goods and services. BD has over 700 core 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 in the US. BD's Australia sites include Sydney, Melbourne, Hamilton, Adelaide, and Perth, with Sydney representing our country specific headquarters. BD's main operations include the provision and delivery of medical technology.

Globally, this includes the direct employment of workers to manufacture products, research and development of products and services, global sales and marketing programs, and distribution of goods and services. In Australia, BD's operations include marketing, sales, and distribution of goods and services.

## Risks

The area of highest risk where BD may *contribute to* modern slavery activities exists within our supply chain. With a global supply chain of over 30,000 tier 1 suppliers, the size of our supply chain presents a risk that we may not be able to discover high risk suppliers for further evaluation through existing due diligence processes. This is because of the vast number of suppliers to assess. 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 pre-screening due diligence processes that focus on high risk geographies.

BD suppliers are analyzed, via a third party, against two focus areas; industry specific risk and geographic or location risk<sup>1</sup>. BD recognizes that our highest risk suppliers are likely to be found in countries cited for having the highest prevalence of modern slavery and human rights violations. Those suppliers with the highest risk profile are prioritized for further evaluation (see more information in the due diligence section, below).

BD also has processes and policies in place to reduce the risk of modern slavery instances in our own operations. We continue to review our own processes in an effort to further prevent this risk.

## Assessing and Managing Risk

### *Policies*

BD is committed to acting in full compliance with all applicable laws and BD's high 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, which 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 BD Human Rights Policy, which outlines our policy on human rights in more detail.

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<sup>1</sup> Risk, in this case, is specific to modern slavery and human rights risk.

- BD Expectations for Suppliers, which prohibit the use of involuntary labor of any kind, including slave labor, indentured/debt labor, forced labor, or prison labor by BD suppliers.

### *Implementation*

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.

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.

Additionally, BD employees are trained to report concerns around Code of Conduct violations to the BD Ethics Hotline (see page 62 of the Code of Conduct). BD suppliers are also encouraged to report concerns through the same process (see page 7 of BD's Expectations for Suppliers). Such reports may trigger additional risk assessments involving the Ethics Office, Global Operations, and any other relevant departments, until identified risks are adequately managed, by appropriate follow-up actions where necessary.

BD's Expectations for Suppliers (EFS) was first published in 2009, and since that time BD has worked to communicate the EFS with suppliers and confirm their compliance. Compliance has been evaluated primarily through written acknowledgements and through periodic audits based on a high level of risk. BD has also worked to include language that requires compliance with the EFS in all contracts and Purchase Orders.

### *Training and Capacity Building*

BD is committed to raising awareness about human rights risks, including risks of modern slavery, across our business and supply chain. To that end, BD provides training to internal audiences, particularly those in procurement functions, on implementation of our Expectations for Suppliers.

BD has conducted awareness-raising trainings on our Expectations for Suppliers for key suppliers via Supplier Management meetings and summits in a number of regions where these suppliers are located. These trainings include definitions of forced labor, modern slavery, and human trafficking, tools on identifying red flags and high-risk areas, and guidance on best practices.

In FY'2020 BD rolled out a third-party online course on Modern Slavery and Human Trafficking to over 10,000 associates. This training further defines modern slavery, human trafficking, and other human rights risks, teaches associates how to identify risks, and reminds associates to report suspected human rights related abuses. This course is an annual assignment.

Additionally, all BD associates are trained on our BD Code of Conduct, annually.

### *Due Diligence*

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 robust.

Within our supply chain, suppliers receive an initial assessment against twelve risk factors including corporate social and environmental risk factors, during the on-boarding process.

Newly acquired operations are prioritized for review to ensure that they meet BD expectations and policy requirements.

Suppliers are prioritized based on a risk assessment that includes industry, geography, and information from 3rd party risk monitoring services. Those suppliers rated as high priority will be asked to complete an in-depth desktop audit, the results of which will guide BD's remediation efforts, if necessary. BD started our initial desktop audits with a limited number of core suppliers in FY2020 and plans to roll these audits out on a larger scale in the next year. As part of our continuous improvement plans, we aim for all BD suppliers to complete a desktop audit over the long term.

BD is also engaged in a long-term mapping of our wider supply chain, with the priority falling on our core supplier list. This will help us to better understand our Tier-n supplier risks and respond to these risks in our supply chain accordingly.

### *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 matter 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.

BD 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.

### **Measurement and Effectiveness**

Across all our programs that address Human Rights and Modern Slavery, we assess management effectiveness through periodic program reviews. BD is also in the process of evaluating, updating and implementing internal key performance indicators for this work. We will begin to report some of these KPIs publicly in the near future.

We also participate in industry working groups where we learn best practices that have been implemented by companies across sectors, and we seek to apply those where they add value to our programs.

BD strives to continuously improve its programs to ensure compliance with applicable laws and BD's high ethical standards and to meet the expectations of our customers, our shareholders, our associates, our communities and other stakeholders.

A handwritten signature in black ink that reads "Vincent A. Forlenza".

Vincent A. Forlenza  
*Executive Chairman*  
December 2020

A handwritten signature in black ink that reads "Tom Polen".

Tom Polen  
*President and Chief Executive Officer*  
December 2020

*This Modern Slavery and Human Trafficking Statement applies enterprise-wide to all BD entities. For the purposes of the Modern Slavery Act 2018 in Australia applies to the following entities: Becton Dickinson Pty Ltd, Becton Dickinson Ltd & Bard Australia Pty Ltd..*