

Becton Dickinson Management & Co KG Guideline on the Supply Chain Sourcing Obligations Act – LkSG

Becton Dickinson Management & Co KG and its affiliates in Germany

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(hereinafter “BD” or “we”), is part of Becton, Dickinson and Company headquartered in New Jersey, USA. The company’s European headquarters is located in Eysins, Switzerland. BD has high standards for minimizing human rights and environmental risks in our supply chains are important goals for us, in line with the requirements of the Supply Chain Due Diligence Act (LkSG). To achieve these goals and implement the LkSG adequately, we have implemented the following policies, processes and internal guidelines.

1. Supply chain risk analysis and management

At BD, we have implemented a risk management system and defined the internal responsibilities for it. We work closely with our *BD Global Responsible Sourcing Procurement Team* and other BD departments to get a holistic overview of our production and procurement processes. We ensure that applicable legal and regulatory requirements and BD’s policies and ethical standards are complied with at our respective locations, as well as in our suppliers’ locations. We also work with the *BD Global Corporate Sustainability Team* to monitor our supply chains with special consideration of the human rights and environmental standards protected by the LkSG.

To optimize our supply chains with regards to the human rights and environmental factors covered by the LkSG, BD conducts an ongoing assessment of its suppliers. This process includes the review of our direct and indirect suppliers for potential human rights and environmental risks with respect to the LkSG. All suppliers are centrally assessed within the group for these risks, in order to create an overall picture as part of BD’s risk management process.

Naturally, the types of risk identified within this risk management framework continue to evolve. At the time of the creation of the policy statement, we identified the following risks for BD.

BD Germany sources from a global supply chain, and therefore the greatest human rights and /or environmental risk to our supply chain is that of the size and scope of our supply chain. Our preliminary risk assessment of suppliers uses a third-party tool to provide a score for each supplier's risk of potential human rights abuses and environmental risks based on location of that supplier. BD regularly assesses our supply base through this tool to evaluate changes in supplier risk for human rights abuses. This tool assesses the risk to basic human rights including child labor, worker's rights and personal freedom and environmental standards into a low/medium/high rating. As a result of this preliminary assessment, we have identified key countries that represent a higher risk to our global supply chain human rights and environmental efforts.

Suppliers that are rated as a high risk based on that preliminary risk assessment (or have a supplier in one of these countries, based on our mapping results) are prioritized for a deeper assessment via desktop audit administered by a third party. During these assessments we are able to understand if a company has the proper practices in place to manage human rights and environmental risk and we may identify key areas where suppliers represent a risk. The identified risk areas for the purpose of this German Supply Chain Due Diligence report include lack of proper measures to prohibit environmental pollution, discrimination and/or harassment in the workplace, unfair wages, lack of social dialogue, and lack of proper health and safety measures for employees, among others.

In any instance where these risks are found (in addition to global risks that impact our wider supply chain and meet other country compliance requirements), we assign corrective actions directly with the supplier (which also includes a how-to implement guide) so suppliers can remediate the issue. Suppliers must demonstrate they are making progress on assigned corrective actions. If these corrective actions are not completed, the supplier will be added to a pool of suppliers to be further evaluated, either by in person audits or direct engagement.

2. Risk-based control measures

Our BD supplier code of conduct, also known as the *BD Expectations for Suppliers*, requires that all our direct suppliers protect and promote the human rights of their employees and treat their employees with dignity and respect; these suppliers must also avoid being involved in human rights violations, combat potential risks to human rights compliance such as human trafficking and slavery (e.g., child labor and forced labor), and comply with all legal and regulatory requirements regarding human rights and working conditions. Additionally, the BD Expectations for Suppliers also requires that suppliers protect and preserve the environment, in addition to various topic areas.

Our Expectations for Suppliers can be found in multiple languages [at this link](#).

Our BD Code of Conduct can be found in multiple languages [at this link](#).

The BD Expectations for Suppliers applies to all our direct suppliers, and we expect our suppliers to deploy similar programs among their own suppliers. Our teams monitor and assess the potential risks to human rights and environmental standards protected by the LkSG among our direct and indirect suppliers. In addition, our suppliers must maintain the appropriate documentation necessary to confirm compliance with supplier policies as well as all applicable laws, regulations, rules, permits, licenses, approvals, and instructions.

3. Preventive and remedial measures

If, as a result of our risk analysis, a risk or violation of the human rights or environmental standards specified in the LkSG is identified, BD takes appropriate measures to prevent, combat, minimize and/or remedy the problem. These measures may include training (including verification) or audits of suppliers, as well as termination of supply contracts, among others.

To achieve this goal, the *Responsible Sourcing Operating Committee*, which is responsible for monitoring this process, meets regularly to review supplier assessments and initiate and monitor corrective actions as needed.

BD has an internal process that guides these efforts - the process of due diligence with respect to human rights and environmental standards in the supply chain. This process also sets the threshold at which BD will conduct a review, evaluate BD's potential role in human rights or environmental violations caused by suppliers, implement corrective actions, and determine when to terminate a business relationship with a supplier due to known or suspected human rights violations.

4. Complaints procedure

BD has established a process through which violations of the LkSG can also be reported to the company. Several communication channels exist for this purpose:

- Online, via a tool set up for this purpose [with this link](#)
- By telephone, via an Ethics HelpLine
- By e-mail via a dedicated e-mail address ethicsoffice@bd.com

This complaint mechanism is available both to the company's own employees and to external stakeholders (employees, suppliers, NGOs, trade unions, etc.).

5. Documentation and reporting obligations

BD continuously records the fulfillment of the due diligence obligations specified in the LkSG. In addition, in accordance with the requirements of the LkSG, an annual report on compliance with the LkSG will be prepared for 2024. This report is published on our website and made available to the public.

This Germany Supply Chain Act statement applies to enterprise-wide to all BD entities.

This statement was approved and adopted by the BD Board of Directors for Becton Dickinson Management GmbH & Co KG on 08.01.2025. It reflects the status as of 01.01.2025.