

# BD CONFLICT MINERALS POLICY

## COMPANY POLICY

Approved by:

**Effective Date:** June 21, 2016

**Vincent Forlenza**

**Chairman, Chief Executive Officer & President**

## CONFLICT MINERALS

### BACKGROUND:

On August 22, 2012, the final rule regarding the sourcing of Conflict Minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act was adopted by the U.S. Securities and Exchange Commission ("SEC"). The "Conflict Minerals Rule" refers to Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and imposes reporting requirements on publicly traded companies subject to SEC oversight, such as BD. These companies are required to annually report on the origin of specified Conflict Minerals in the products they manufacture or contract to manufacture, if the minerals are contained in the product and necessary to its functionality or production. As used herein and consistent with the Conflict Minerals Rule, "Conflict Minerals" or "3TG" are columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to the location of origin of the minerals or derivative metals. Due diligence and additional reporting is required if the 3TG originated from Conflict Affected Regions or if BD has reason to believe that the 3TG may have originated in a Conflict Affected Region and that they may not be from recycled or scrap sources. The first report was filed with the SEC by May 31, 2014 for activity within the 2013 calendar year, with the same reporting schedule to continue every year thereafter.

### PURPOSE:

This Conflict Minerals Policy (the "Policy") is intended to help BD associates to take the steps necessary to comply with the Conflict Minerals Rule and to source responsibly. The Conflict Minerals Rule intends to address the humanitarian crisis in and near the Democratic Republic of the Congo by reducing the illegal trade in 3TG that has benefitted the armed groups responsible for the violence in the region. BD is committed to ethical business practices and expects the same commitment from our suppliers. In furtherance of our commitment and the Conflict Minerals Rule, BD will conduct a reasonable country of origin inquiry and/or due diligence, in each case to the extent required by the Conflict Minerals Rule, on its supply chain to identify the origin of any necessary 3TG that are present in BD products. As part of our compliance efforts, BD will solicit declarations from our suppliers and subcontractors relating to the usage and origin of 3TG in their products, prepare and file with the SEC a Form SD and, if required, a Conflict Minerals Report, and, to the extent required, obtain a third party audit of the applicable portions of our Conflict Minerals Report.

### SCOPE:

This Policy applies to all BD Associates and operations worldwide without exception.

# BD CONFLICT MINERALS POLICY

## **POLICY:**

As indicated above, BD is committed to taking the steps necessary to comply with the Conflict Minerals Rule and is implementing processes to meet the Rule's requirements. BD expects its suppliers and subcontractors to source responsibly, respect human rights, and not contribute to conflict.

Without limiting the foregoing, BD expects that its suppliers and subcontractors will not source Conflict Minerals or 3TG from sources that directly or indirectly finance or benefit armed groups in the Conflict Affected Region. The current Conflict Affected Region is defined as the Democratic Republic of the Congo and its adjacent countries, which include Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. In furtherance of this expectation and BD's obligations under the Conflict Minerals Rule, applicable BD suppliers and subcontractors (as defined by BD's Supply Based Compliance group) will be expected to complete a declaration concerning the usage and source of any 3TG in the products supplied to us. As part of gathering the information for the declaration, applicable BD suppliers and subcontractors will be expected to conduct a reasonable country of origin inquiry and/or due diligence, as applicable, in accordance with the Conflict Minerals Rule and the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance").

BD has committed to place into effect processes and procedures to help ensure that we receive responsibly sourced materials from our suppliers and subcontractors, including the following:

1. Require applicable suppliers and subcontractors to provide origin information on the 3TG contained in their products, and require that they report sourcing changes of these minerals to BD.
2. Assure through internal evaluation that new materials being considered for potential integration into existing or new BD products do not contain 3TG from sources that directly or indirectly finance or benefit armed groups in the Conflict Affected Region.
3. Within BD, put in place processes and procedures that enable BD to monitor for, integrate, and comply with other regulations relating to 3TG.
4. Communicate to applicable suppliers and subcontractors our expectation that they: a) adopt policies on responsible mineral sourcing that are consistent with this Policy; b) establish due diligence frameworks and management systems that are consistent with the OECD Guidance; and c) communicate an expectation to their direct and indirect suppliers that they do the same.

In cases where suppliers or subcontractors are found to not be in compliance with our Policy, we intend to work with and encourage them to source responsibly. Where these efforts fail or we believe that further engagement with a supplier or subcontractor is inappropriate, we will re-evaluate our business relationship.

We discourage the embargoing of 3TG from the Conflict Affected Regions and advocate the responsible sourcing of 3TG.

Any questions concerning this Policy should be directed to [ConflictMinerals@bd.com](mailto:ConflictMinerals@bd.com).