



The BD Code of Conduct

Bringing our values to life

Revised and reinstated January 25, 2021



Message from our Chairman, CEO, and President



We work in the most dynamic and consequential industry in the world. The products we make today are a vital part of the global healthcare system, and we have the capability to change even more lives in the future as we work together to fulfill our Purpose of *advancing the world of health™*.

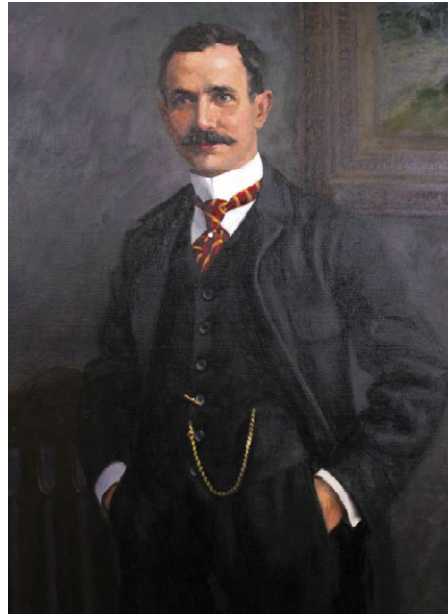
Our Purpose comes with enormous responsibility, and how we deliver on this promise is just as important as what we ultimately accomplish. The answer can be found in The BD WAY—the values, mindset, and leadership commitments that surround our Purpose—and in one value in particular: **“We do what is right.”** This is the foundation of our Code of Conduct, which guides every decision we make, every action we take, and every interaction we have—with our customers, our business partners, our communities, and each other. This includes speaking up when we have concerns and seeking help when we have questions.

Our Code of Conduct provides direction on how we must behave in any scenario, and it applies to all of us, equally. Nothing is more essential to our success than doing the right thing; by familiarizing yourself with the Code of Conduct, you’ll be taking an important step in helping us fulfill our Purpose and potential the right way—The BD WAY.

A handwritten signature in black ink that reads "Tom Polen". The signature is fluid and cursive, written in a professional style.

Tom Polen
Chairman, CEO, and President

A history of values



Our founders, Maxwell W. Becton and Fairleigh S. Dickinson

In 1897, Maxwell W. Becton and Fairleigh S. Dickinson founded Becton, Dickinson and Company.

Since its founding over 120 years ago, BD has earned its reputation for reliability and honesty. Our customers trust our products and technologies to improve patient lives.

Our Code of Conduct helps shape our long-standing reputation so that we can continue *advancing the world of health™* for everyone who depends on us.



East Rutherford, New Jersey (1906), the company's first plant and corporate headquarters

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The BD WAY

The BD WAY

The BD WAY embodies who we are, what we stand for, and why we exist. It reflects the behaviors we're all expected to demonstrate every day, no matter what we do.

Our Purpose

Advancing the world of health™

Our Purpose—*advancing the world of health™*—is the basis for all that we do. It motivates us and drives the decisions we make every day, because we know our work means something.

Our values: Our standards of behavior

- ✔ We do what is right.
- ✔ We thrive on innovation and demand quality.
- ✔ We are all accountable.
- ✔ We learn and improve every day.
- ✔ We help each other be great.





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Doing what is right



Our Purpose and values guide everything we do, but they won't answer every question that comes up in our work. That's where the Code of Conduct (the "Code") can help. The Code explains how the principles embodied in our Purpose and our values come to life. It helps us make the right decisions in everything we do.

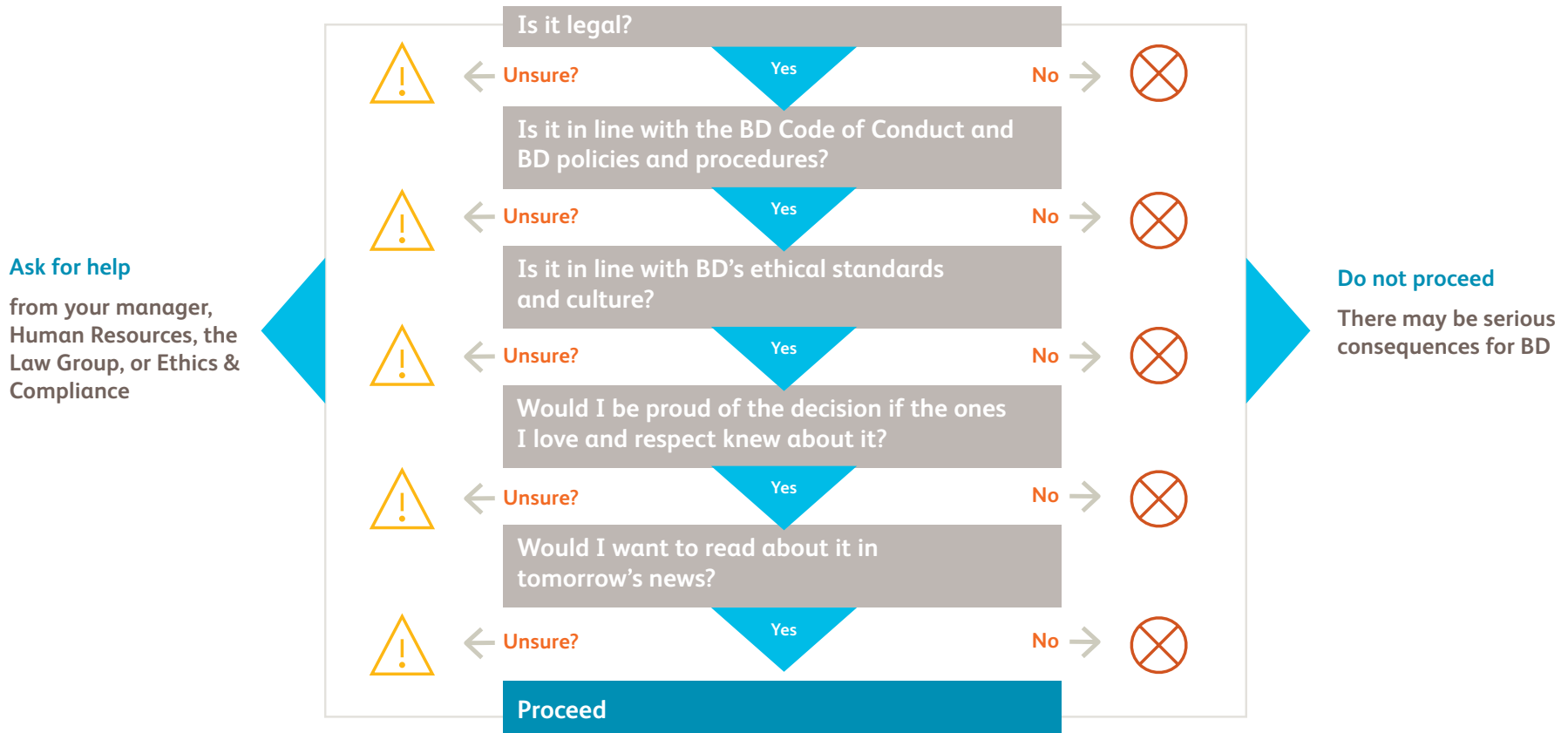
Our Code

Our Code sets the foundation for how we behave at BD. Our value “We do what is right” is the cornerstone of our Code. To do what is right, we follow the laws, rules, and company policies that apply to us. We also follow the highest ethical standards, even when there’s no specific law or policy. Our Code provides guidance and resources to help us follow through on these ethical standards and protect our reputation.

Making ethical decisions

Many times, the right path is clear. Sometimes, however, it may be difficult to see which way is best. When that happens, follow the steps in the Ethical Decision Tree, while remembering our values and our Code.

Making decisions based on our values strengthens our ethical culture, minimizes risk, and helps protect our company’s reputation. And don’t worry, whenever you need advice, you can always ask your manager, **Human Resources**, **Internal Audit**, the **Law Group**, or **Ethics & Compliance**.





Speaking up

Ask questions. Raise concerns. Seek guidance.

We encourage and expect everyone at BD to speak up by asking questions, raising concerns, seeking guidance, and reporting actual or suspected violations of laws, our Code of Conduct, our policies, relevant industry codes, or our high ethical standards. This expectation extends to all associates, vendors, and other third parties working on our behalf.

It's critical that we speak up when we see something that conflicts with our values or our Code. Speaking up helps all of us protect the company's reputation, and makes BD a better place to work. If there is a mistake, we're transparent about it, and we do what we can to make it right, to the best of our ability.

Ethics Helpline

The **Ethics Helpline** is available anywhere in the world 24 hours a day, 7 days a week. An independent company operates the Helpline and can take calls in most languages.

We encourage you to report issues face-to-face or by phone. You may remain anonymous if you choose, **except in the rare cases when local law prohibits it**. Keep in mind that it may be more difficult to investigate and address your concerns if you remain anonymous.

BD associates are encouraged to have open communications with their manager(s), local AccessHR, and HR partners. This lets all of us raise issues, ask questions, and constructively challenge others to be better and advance health in the process. If you're worried about raising an issue locally, you can always contact the Ethics Office directly, and depending on local laws, you can often do that without sharing your name.

You may ask questions, raise concerns, or seek guidance in a number of ways, such as:



Using the online reporting tool at: www.bd.ethicspoint.com



Calling the **Ethics Helpline**—you can find the right local or international number on Maxwell, our intranet site



Emailing the Ethics Office: ethicsoffice@bd.com



Talking to your manager or a neutral and uninvolved manager if you'd prefer



Contacting a representative in **Ethics & Compliance**, **Human Resources**, **AccessHR**, **Law Group**, or **Internal Audit**



Accessing the **ethics@work** app on your mobile device to connect with Ethics & Compliance resources anywhere, anytime



For more information and examples of the types of issues to report, see the **Global Speaking Up Policy**.



Speaking up (continued)

Advancing your knowledge



Speaking up: Myths versus facts

We understand that some people will have questions about whether they should report possible misconduct. Here are some common myths about the **Ethics Office** and speaking up, along with the facts that counteract those myths.

Myth #1: BD will retaliate against me for speaking up.

Fact: BD does not tolerate any form of retaliation against anyone who reports an issue.

Myth #2: Nothing will happen as a result of my report.

Fact: BD takes all reports seriously and will conduct a prompt, fair, and thorough investigation. See **Reporting concerns**.

Myth #3: It's not right to "tell" on a co-worker.

Fact: Speaking up is not always easy, but it is always the right thing to do. It helps us protect BD, our colleagues, and ourselves from further harm. It is also something that is required of each of us as associates.





Active listening

Authentic conversations go two ways. When both people are fully engaged in a conversation, they will each understand what the other is saying. That kind of good communication is important if we want to make sure we're always doing the right thing. So, in addition to speaking up, we expect all BD associates to use active listening to fully appreciate what someone is saying.

An active listener does five things:

- Fully concentrates on the speaker
- Asks clarifying questions while confirming understanding
- Replies based on what is said, not just the listener's point-of-view
- Affirms the genuineness of the speaker's feelings, perceptions, and conclusions
- Recalls what the speaker said

Active listening will help you bring The BD WAY to life. You will help your fellow associates be great, and you will build trust among them. By creating a real opportunity to be heard and a sense of safety and belonging, you will also foster our company's culture of inclusion.





Zero tolerance for retaliation

BD does not tolerate any form of retaliation. This applies to anyone who reports an actual or suspected violation of BD policy or cooperates in BD investigations. BD wants all associates to feel comfortable asking questions, raising concerns, or seeking guidance without fear of retaliation.

Any BD associate who engages in retaliation will be subject to disciplinary action, up to and including termination of employment. If you believe someone has retaliated against you, contact **Human Resources** or **Ethics & Compliance**.



Advancing your knowledge



What does retaliation* look like?

- Terminating, demoting, or suspending an associate
- Denying benefits
- Threatening or belittling an associate
- Passing over an associate for a promotion, raise, or bonus
- Requiring an associate to meet burdensome and unrealistic expectations
- Providing negative performance reviews
- Removing an associate from accounts or projects
- Reducing an associate's hours
- Ignoring an associate or leaving them out of team events and meetings

*Retaliation is when these actions are taken *because* an associate reported an actual or suspected violation of BD policy or cooperated in a BD investigation.



Reporting concerns

BD takes all reports of violations of laws, BD policies, and our high ethical standards seriously. We promptly, fairly, and thoroughly investigate all reports. The **Ethics Office** assigns an independent investigator to review the facts. The **Ethics Office** monitors the investigation to ensure it follows BD standards.

Everyone at BD must cooperate fully with any BD investigation or audit. This includes answering questions truthfully, sharing all relevant information, and protecting potential evidence. Anyone accused of wrongdoing will get fair and objective treatment.

Confidentiality is a top priority for BD. We take care to keep your identity confidential. This may not always be possible though due to the nature of the issue, the need to conduct a more thorough investigation, or legal requirements.

BD will take appropriate corrective action for any misconduct. Violations may result in disciplinary action, up to and including termination of employment. Serious violations could also result in legal liabilities for the company and/or the involved individuals. See **Our expectations**.

Being an ethical leader

Each of us must be an ethical leader. This means we do the right thing, every time—even when it is not easy and even when no one is looking. It also means we don't compromise our values or ask anyone else to do so.

If you are a BD leader or manage people, you have a special duty to foster a culture of ethics and integrity by:

- Serving as a role model and leading by example in all you say and do
- Encouraging your team to speak up when they have concerns, listening to those concerns, and handling them appropriately
- Ensuring your team has the knowledge and resources to perform their jobs in an ethical manner
- Talking to your team regularly about the Code and what ethical and compliant behavior means for them
- Making it clear that we never compromise our ethics to achieve business results
- Never retaliating or allowing retaliation against any associate who reports an issue or raises a concern
- Recognizing and rewarding ethical behavior, addressing and correcting inappropriate behavior, and doing so consistently
- Considering ethical character and behavior when making decisions about hiring, promoting, and evaluating associates
- Taking action to prevent or stop violations of the Code or the law, and ensuring issues are properly reported and addressed

Authentic answers



Q An associate who reports to me came to me very upset about a problem she's having with a colleague from another department. She says she's being harassed, but I'm not sure. Maybe she's just being sensitive and overreacting. What should I do?

A Listen. Listen. And listen some more. It's very important for your associate to know that you take her concerns seriously. Let her know you'll bring this matter to the attention of the **Ethics Office** so it can be investigated and dealt with discreetly and appropriately. Reassure her that you won't allow retaliation of any kind to be directed against her. Avoid jumping to conclusions.



Applying our Code

Our expectations

Everyone at BD, from directors to officers and associates, must follow our Code of Conduct. It applies equally to everyone, no matter their position or level. This is a condition of employment at BD.

Note: Nothing in this Code creates or implies a promise or contract of employment.

Our responsibilities

At work, we must always make choices in line with our values and the Code. Among other things, this means:

- Meeting our standards, as our Code sets out
- Never compromising our values to achieve our objectives
- Learning and following our Code, policies, and procedures, and all laws and regulations that apply to our job
- Speaking up when we see or suspect someone isn't following the Code, and asking for help when it's not clear what we should do

In short, we must always: ***ask questions, raise concerns, and seek guidance.***

Waivers

Waivers of any provision of the Code are rare and may be granted only by the Chief Ethics & Compliance Officer, in consultation with the General Counsel. Waivers for executive officers or directors may only be granted by the Board of Directors and must be promptly disclosed to shareholders.





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Our people



Advancing the world of health™ and achieving our goals is possible only thanks to the dedicated and talented people who work at BD. The health and well-being of people is at the core of everything we do. That's why it's so important for us to treat each other fairly and maintain a safe and healthy workplace.



Fostering a respectful workplace

What we believe

Everyone deserves to work in a supportive, inclusive, and safe environment. We treat everyone with dignity and respect.

Why it matters

Respecting others is an important factor for our success. We do our best work when we feel safe and secure, knowing that our ideas and talents will be recognized and respected. That's why we never tolerate discrimination, harassment, retaliation, bullying, or violent conduct at work.

How we do what is right

✔ Do:

- Treat one another with dignity and respect
- Speak up if you see anyone being harassed or threatened in any way

✘ Don't:

- Say or do anything that others may find offensive or degrading



Fostering a respectful workplace (continued)

Supporting inclusion and diversity

We serve our customers best when we seek out and listen to a broad range of ideas and opinions by:

- Recruiting, hiring, and retaining the best talent from a wide range of backgrounds
- Actively searching for different points of view
- Listening to the points of view of others with courtesy and respect
- Speaking out when we feel our views or those of others are being disrespected



Preventing discrimination

We will not be successful if we limit others. Instead, we do what's right by:

- Treating others fairly and focusing on the skills and experience they bring to BD
- Using only merit and performance for decisions about hiring, training, discipline, and promotion
- Never discriminating against anyone on the basis of “protected characteristics”

These include:

- Race
 - Color
 - Gender (including pregnancy, childbirth, lactation, and related medical conditions)
 - Age
 - National origin
 - Ancestry
 - Pregnancy
 - Physical or mental disability
 - Medical condition
 - Religious beliefs
 - Sexual orientation
 - Genetic information
 - Gender identity
 - Gender expression
 - Marital status
 - Citizenship
 - Military or veteran status
 - Social class
 - Any other characteristic protected under applicable law
- Accommodating individuals with legally recognized disabilities and/or religious beliefs

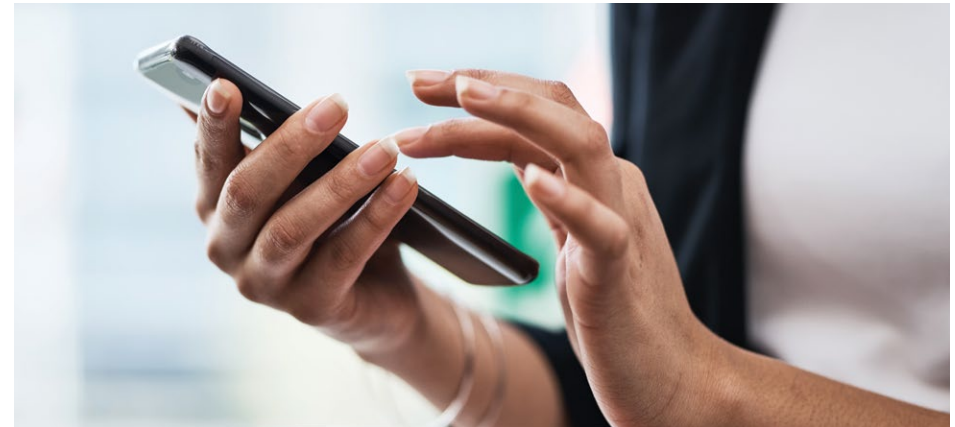


Fostering a respectful workplace (continued)

Preventing harassment

We don't tolerate harassment. Harassment is any unwelcome verbal or physical conduct based on a "protected characteristic." It may also include conduct of a sexual nature. Harassment may create an intimidating, hostile, or offensive work environment.

See "[Preventing discrimination](#)."



Here are some examples of sexual harassment:

- Inappropriate physical contact
- Sexually suggestive comments
- Offensive language or images passed along by any means, including the internet, email, voicemail, text, or instant message
- Unwanted advances or offers
- Asking for sexual favors or offering employment benefits in exchange for them
- Making derogatory comments or sexually explicit jokes
- Making comments about someone's body
- Using degrading words to describe someone
- Suggestive or obscene letters, notes, or invitations
- Any sexually suggestive behavior, such as leering, making gestures, or displaying sexually oriented objects or pictures

Authentic answers



Q Lately I've noticed in meetings that some associates' ideas aren't recognized or that some people are often interrupted when they're talking. I'm worried this is because of their gender. I don't feel comfortable pointing it out during the meeting. What should I do?

A Part of our commitment to inclusion and diversity is seeking multiple viewpoints, which means providing a space for associates to speak up. You should speak with the meeting leader or your manager. If you don't feel comfortable doing that, contact [Human Resources](#).



Get more information:

[Equal Employment Opportunity and Affirmative Action Policy](#)



Upholding labor and employment laws

What we believe

We respect everyone, and that starts here in our business. We think that following the laws when it comes to labor and employment issues is not only the right thing to do, but it will also help our business grow. So, we follow all labor and employment laws to protect our associates and our business.

Why it matters

We show respect for our people by creating a safe and fair place to work. When people get fair and respectful treatment, they will have more motivation, do better work, and gain more satisfaction from their work.

How we do what is right

✓ Do:

- Provide working conditions, hours, and compensation that are safe and fair
- Report any concerns about hours and compensation to Human Resources
- Choose suppliers who are committed to fair labor and sustainable sourcing practices that protect the health and well-being of workers and communities

✗ Don't:

- Allow child labor or forced labor by BD or our suppliers

Advancing your knowledge



How does BD comply with wage and hour laws?

BD is committed to paying every associate properly according to applicable laws. To do that, we keep records of the hours worked by all non-exempt (overtime eligible) associates. In most cases, we use an electronic system, which lets associates accurately record the time they've worked.

There are notices in all work sites about wages and hours, including the right to be paid for all hours worked. In the United States, "off-the-clock" hours are not allowed for non-exempt associates. We also post notices about what work qualifies as overtime and how we calculate what associates are compensated for that type of work. If you have any questions or want to raise concerns about hours or wages, contact [Human Resources](#) or the [Ethics Office](#).



Get more information:

[HROne](#)

[Expectations for Suppliers](#)

[Global Human Rights Policy](#)



Keeping workplaces safe and healthy

What we believe

Everyone deserves to be safe and healthy in the workplace. It's important to make sure our operations meet or exceed applicable health and safety laws.

Why it matters

Our number one priority is making sure that our associates and all those who visit us are safe. We also know that a healthy work environment is a positive, enriching, and productive one. We make sure our workspaces are free from hazards and allow us to thrive. We use environmental, health, and safety management systems to achieve this.

How we do what is right

✓ Do:

- Follow our health and safety policies and procedures
- Report unhealthy or unsafe conditions or behaviors. This includes things like workplace hazards, broken or missing equipment, or the presence of weapons on BD property. Contact law enforcement in case of immediate danger.
- Know what to do in case of injury or other workplace emergencies. You can do that by cooperating during emergency drills.
- Try to talk through disagreements calmly before they escalate

- Report any threats of violence directed at you or anyone else. That includes anything, even if it's outside work or on social media. Contact law enforcement in case of imminent danger.
- Travel with reputable airlines and use BD preferred hotels. Follow travel guidance and alerts issued by Corporate Security.

✗ Don't:

- Take unnecessary risks in the workplace or tell anyone else to do so
- Take shortcuts or bypass health and safety policies and procedures—if you are pressed to cut corners, report it
- Bring alcohol, illegal drugs, or other controlled substances onto BD property or be under their influence while at work
- Smoke or vape on BD property
- Bring weapons or firearms to work. That includes job sites and other work-related locations.





Keeping workplaces safe and healthy (continued)



Authentic answers



Q I saw a former co-worker on social media threaten to hurt BD associates. I don't want to overreact or make the situation worse. What should I do?

A We all have to help keep people safe. If you see or hear anyone threaten to hurt someone or damage something, tell someone right away. You can report it to your manager, **Human Resources**, the **Ethics Office**, or **Corporate/Site Security**. When there is an immediate risk to life or property, contact local law enforcement immediately. Also, tell someone on the Corporate Communications team, so they can monitor the situation.



Get more information:

[Corporate Security site](#)

[Workplace Violence Policy](#)

[Weapons in the Workplace Policy](#)

[Environment, Health and Safety policy](#)



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Our customers and marketplace



Our customers and the patients who use our products count on us to do what's right. We follow through on our commitment to our customers and their patients by always behaving ethically in everything we do. We follow all laws and regulations that apply to us when we do business, wherever in the world that may be. We consistently provide superior products and services that are safe and effective for our customers and patients. We are fair and honest in all our business dealings.

We don't cut corners. We don't choose the easy way over the right way.



Authentic answers



Q I always want to win. I try to encourage my team by telling them that we need to crush the competition and block them from the market. Am I doing the right thing?

A Saying things like “crush the competition” may seem like just an expression of enthusiasm. However, it could also be seen by regulators as a sign of illegal business practices. It can also create a culture where people think winning is the only goal, and as a result start using deceptive or unfair tactics. Instead, focus on the value and benefits of our products and services. We succeed because we have new and useful ideas and technology. That’s what separates us from the competition.

Playing fair

What we believe

We will succeed as a business because we have ideas and technology that meet the needs of customers and patients. We are fair and honest when we do business. We follow all the laws that govern how companies compete and behave with each other.

Why it matters

Fair competition laws, such as antitrust laws, promote healthy competition and protect consumers from unfair business practices. We will win in the marketplace based on the value of our products and services.

How we do what is right

✓ Do:

- Avoid any false or dishonest practices
- Seek help from the **Law Group** if we want to compare our situation with a competitor or are unsure about how to act with competitors

✗ Don't:

- Discuss pricing, contract terms, or marketing/sales strategies with competitors
- Agree with competitors to divide markets, territories, or customers
- Use our category position in an illegal or unethical manner to reduce, prevent, or eliminate competition
- Make agreements with customers or sales channels like distributors to restrict resale prices
- Make false claims or disparaging comments about our competitors’ products or intentionally interfere with their business relationships



Authentic answers



Q A nurse working for one of our customers sent me pricing information and contract terms from one of our competitors. The nurse didn't think it was confidential. Can I use this information to prepare a bid to win business currently held by the competitor?

A No. The information could be confidential, even though the nurse didn't think so. Using that information may not be ethical and could conflict with our Code. In this situation, it's best to contact the **Law Group** for guidance.

Playing fair (continued)

Competitive intelligence

To compete effectively, we must understand our evolving industry and our competitors. However, we must gather and use information about our competitors responsibly and ethically. We should treat other companies and their information as we would want them to treat us.

How we do what is right

✓ Do:

- Use publicly available sources whenever possible
- Follow any confidentiality or nondisclosure agreements when we can see another company's information
- Respect our competitors' rights regarding their intellectual property and confidential information

✗ Don't:

- Ask for sensitive or confidential business information from competitors or their customers
- Use illegal methods such as trespassing or theft to get information about other companies
- Hire or talk to former employees of competitors to get confidential information



Get more information:

[Global Antitrust and Competition Law Policy](#)



Dealing ethically with HCPs, HCOs, and government officials

What we believe

Strong, long-term relationships with healthcare professionals (HCPs), healthcare organizations (HCOs), and government officials (GOs) help us better understand our customers and their patients' needs. Through collaboration, we continue to develop high-quality products and teach people about their safe and effective use. These relationships must be based on the highest ethical standards.

Why it matters

Law and industry codes around the globe set high standards that govern our interactions with HCPs, HCOs, and GOs. These relationships must always be grounded in a legitimate business need and never be used to secure an improper business advantage. If we can't develop these types of relationships, build trust, and sustain them over time, our reputation will be damaged and our business will suffer. If we make mistakes, the consequences are severe.





Dealing ethically with HCPs, HCOs, and government officials (continued)

Fighting bribery and corruption

We don't accept, offer, or approve bribes of any kind. A bribe or "kickback" is anything of value meant to gain an improper business advantage. It also applies if we attempt to get favorable treatment from a government official. It's critical that we avoid even the appearance of trying to bribe someone.

We follow anticorruption laws in many countries, including:

- U.S. Foreign Corrupt Practices Act (FCPA)
- U.S. Anti-Kickback Statute
- U.K. Bribery Act
- China Anti-Unfair Competition Law
- Brazil Clean Companies Act

How we do what is right

✓ Do:

- Know how to recognize and avoid a bribe
- Follow our **Global Antibribery & Anticorruption Policy**, **Global Third-Party Intermediary Life Cycle Management Policy**, and our **Global Standards for Interactions with HCPs, HCOs, and Government Officials**
- Be aware of how our actions might appear to others
- Record all payments and expenses accurately
- Speak up if you see or suspect bribery
- Seek advice from your local **Ethics & Compliance** representative

✗ Don't:

- Use a third party or someone else to make illegal payments or sidestep BD policies
- Make any payment meant to "facilitate" routine services from a government official, unless it's to protect your personal safety

Advancing your knowledge



We never offer, give, or accept anything of value* to improperly influence decisions or to get an unfair advantage. These might include:

- Cash or cash equivalents
- Gifts
- Entertainment, hospitality, or meals
- Travel expenses
- Services
- Offers of a job or educational opportunities
- Loans or cash advances
- Grants, donations, or contributions
- Free of charge products
- Any other transfer of value, including favors for family members, even when it's a small amount

Free of charge products

We can give products to customers in certain situations. This applies, for example, when we want to demonstrate the product or let a potential customer evaluate if a product fits their needs. Provide only the minimum amount of product needed for the minimum amount of time required. Make sure documentation accompanies any free of charge product/trial use product. Keep track of any free of charge product, and act quickly to get products returned once customers have reached the end of the agreed trial use period.

*Some items of value may be provided in limited situations for legitimate reasons. For example, we can pay for travel expenses and provide free of charge equipment in some cases. Consult your Ethics & Compliance representative for guidance.



Dealing ethically with HCPs, HCOs, and government officials (continued)

Collaborating ethically with healthcare professionals

We can and should collaborate with HCPs for many reasons.

These include:

- Product development and improvement
- Clinical studies or research
- Speaking engagements
- Training and education on the safe and effective use of BD products
- Advisory panel meetings
- Scientific meetings
- Consulting arrangements
- Other legitimate services

How we do what is right

✓ Do:

- Engage with HCPs only if we have a legitimate need
- Choose only qualified HCPs to meet our legitimate needs
- Select locations and venues to interact that are modest and appropriate
- Always follow our HCP Meal Limits Guidelines and only pay for modest travel expenses
- Pay HCPs fair market value for their services as described in our HCP Fair Market Value Compensation Guide
- Make sure clinical studies and research meet the highest ethical, medical, and scientific standards. Medical Affairs must always be involved in clinical study and research initiatives.

✗ Don't:

- Work with an HCP without a proper written agreement
- Attempt to interfere with an HCP's independent medical judgment
- Make arrangements (including grants, donations, or contributions) intended to reward or encourage an HCP to purchase, lease, or recommend our products





Dealing ethically with HCPs, HCOs, and government officials (continued)

Items provided to HCPs, HCOs, and GOs

Giving or accepting gifts or other items can create the perception of a conflict of interest or exposure under antibribery and corruption laws. That's because it could seem as though we're giving the item to get favorable treatment. Important and specific rules apply to gifts, entertainment, educational items, and other business courtesies to HCPs, HCOs, and GOs.

How we do what is right

Do:

- Provide items to HCPs that benefit patients or serve a genuine educational function. Before offering any item to HCPs, HCOs, or GOs, make sure that the item is allowed under BD policies, applicable laws, and industry codes. Many countries have specific requirements restricting items that may be given to HCPs.

Don't:

- Give gifts of any kind, such as cookies, wine, flowers, chocolates, holiday gifts, gift baskets or gift certificates, and cash or cash equivalents, even for significant life events, like weddings, births, anniversaries, or funerals. However, outside the United States, you may provide a modest gift for the death of an HCP or their family member.
- Pay for or facilitate entertainment, personal travel, or recreation of any kind for HCPs or GOs

Authentic answers

- Q** During a sales negotiation, a large HCO requested funding for an investigator-sponsored study. Is it appropriate to provide a research grant to help secure the sale?
- A** No. Sales and research activities need to be kept separate. We can never use a grant to encourage an HCP to purchase, lease, or recommend our products. All requests for investigator-sponsored studies must be submitted via CyberGrants so the right committee can review it.

Innovation through integrity

Throughout our history, we've worked on R&D programs with universities, medical centers, and other organizations. There are many examples of how these relationships have resulted in some of our greatest innovations. For example, our unique collaboration with Singularity University, a California corporation that applies technology to some of the world's greatest challenges, resulted in three important projects. These projects:

- Explored the use of real-time data gathering for home-based disease management
- Created predictive analysis on patient behavior
- Built new visualization tools for high-parameter cell analysis



Dealing ethically with HCPs, HCOs, and government officials (continued)

Transparency laws

Laws and industry codes in many countries require that we report HCP and HCO payments (or certain other transfers of value) to government organizations and/or the public (for example, the U.S. “Sunshine Act”). To do this, we must keep accurate records of all payments. That means following our Transparency policies and processes.



Get more information:

[Global Transparency site](#)

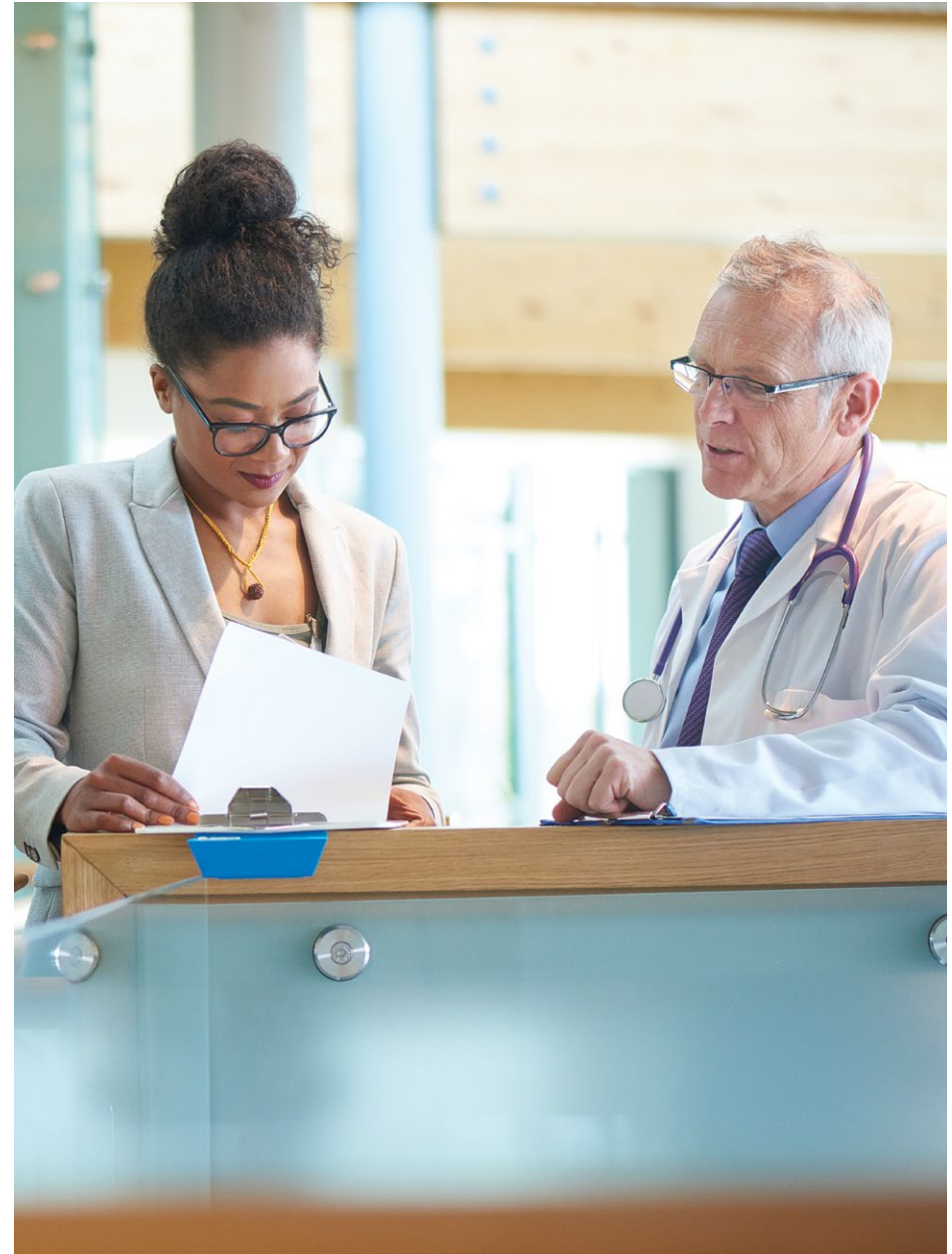
[Global Investigator Sponsored Studies Policy](#)

[Global Standards for Interactions with HCPs, HCOs, and Government Officials](#)

[Global Antibribery & Anticorruption Policy](#)

[Global Free of Charge Products Policy](#)

[Global Third-Party Intermediary Life Cycle Management Policy](#)





Following product rules

What we believe

When we follow the rules for our products, we help ensure they are safe and effective. This will build and maintain trust with our customers, their patients, and government agencies.

Why it matters

Our reputation and ability to sell our products depends on following the rules and regulations in each country where we operate. Our Regulatory Affairs, Quality Management, and Medical Affairs functions all play critical roles in helping us do that.

We follow the rules of government agencies, health ministries, and regulatory authorities around the world. A few examples of these organizations are listed below:

- FDA (U.S.)
- Therapeutic Goods Administration (Australia)
- Health Canada (Canada)
- Ministry of Food and Drug Safety (South Korea)
- National Medical Products Administration (China)
- National Health Surveillance Agency (Brazil)
- Medicines & Healthcare Products Regulatory Agency (U.K.)

How we do what is right



- **Do:** Make sure all products are developed using the appropriate controls and that they pass all appropriate testing before we market and sell them

- Make sure all information we keep or send to government agencies is truthful, accurate, and complete
- Only sell products that are authorized and meet all applicable regulatory requirements
- Properly label, advertise, and promote our products
- Promptly report complaints, adverse events, and other signs of potential product problems



- **Don't:** Assume the rules in your home country are the same in other countries
- Assume someone else will speak up; if you learn of a problem or have concerns, speak up so it can be addressed
- Suppress information that could impact compliance with safety and quality standards



Following product rules (continued)

Authentic answers



Q I was at a party, and I overheard some guests talking about a BD product. They were complaining about some side effects. Should I report this?

A Yes. We take product complaints very seriously, not only because we always want to be improving our products, but also because of the rules and regulations that apply. You should report product complaints to the right people, even if you hear them outside of work. The **Product Complaint Form** on the Maxwell homepage is the best place to do that.



Innovation through integrity



More than 20 bloodborne diseases can be spread by accidental needlestick injuries (NSIs). BD pioneered the development of safety-engineered products to address this issue and continues to be a leading supplier of these technologies.

Our proactive commitment to healthcare worker safety doesn't end with our extensive, innovative product portfolio. BD led the charge for healthcare worker safety legislation and continues to advocate on behalf of nurses and organizations. BD helps to develop and share best-in-class practices and provides open access to training and education to keep healthcare workers safe.



Get more information:

[Product Complaint Form](#)



Scientific exchange

What we believe

Making sure our products are safe and effective is a top priority. We can't promote or advertise any off-label use of our products. But there are important public policy reasons for our Medical Affairs associates to engage in scientific discussions with the external healthcare community related to both on- and off-label uses of our products.

Why it matters

We want to be a trusted and valued scientific partner in developing products that help improve patient care. We also want to help healthcare providers do their jobs more efficiently. Scientific exchange helps us do that, but there are strict requirements. Our scientific exchange principles also make sure we follow applicable legal requirements and that we protect our credibility and our stakeholders' trust.





Scientific exchange (continued)

How we do what is right

✓ Do:

- Separate all scientific exchange activities from commercial and sales activities
- Make sure all scientific exchange communications are non-promotional, balanced, objective, scientifically rigorous, and conducted by appropriately trained Medical Affairs associates
- Support independent continuing medical education programs in accordance with our **Global External Funding Policy**
- Make sure clinical trials are conducted ethically and follow BD policies, all applicable laws, and regulatory requirements
- Respond to unsolicited requests for information about off-label use by first stating that the topic is off-label, and BD recommends use of its products in accordance with the approved labeling. Then refer the person making the request to your local Medical Affairs contact.

✗ Don't:

- Take part in any scientific exchange activity if you work in sales, marketing, or any other commercial function
- Share scientific information that is not balanced with accurate risks and benefits (such as focusing on positive data only)
- Engage in proactive conversations about off-label use or solicit requests for off-label information
- Suggest an investigational product or use is safe or effective



Get more information:

[Global External Funding Policy](#)

[Global Human Subject Research Policy](#)

[Global Data Disclosure and Publication Policy](#)



Ensuring product safety and quality

What we believe

The safety of patients and users of our products are a top priority. We think about the patient and healthcare professional during every step of development and production. We all need to make sure that BD products and technologies meet appropriate safety and quality standards.

Why it matters

To help in successful diagnosis and treatment, BD products must be safe and effective for their intended use. Our customers and patients are at the heart of everything we do, and they depend on the quality and safety of our products. We never cut corners.

BD Quality Policy

“ We will consistently provide superior products and services in pursuit of our Purpose of *advancing the world of health™*. This will be achieved through customer-focused continuous improvement and by maintaining an effective quality system which complies with regulatory requirements.”

—Tom Polen, Chairman, CEO, and President





Ensuring product safety and quality (continued)

How we do what is right

✓ Do:

- Follow quality system regulations, standards, policies and procedures, and good manufacturing practices
- Make sure our products are produced in an environment that promotes quality and consumer safety
- Take personal responsibility for the success of our business by immediately reporting any quality or safety concern

✗ Don't:

- Bypass quality controls or take shortcuts that compromise the quality or safety of our products



Advancing your knowledge



Report any product complaint using the **Product Complaint Form** on the Maxwell homepage within 48 hours of learning about it. Every BD associate is responsible for reporting any product quality or safety issues as quickly as possible so we can address them.

What is a product complaint?

A product complaint alleges quality or safety issues. Complaints can come in many forms, such as an email, a text, a letter, a phone call, or even a comment over coffee. The important thing is that someone is saying that the product doesn't work as it should after we've started to sell it.



Get more information:

[BD Quality Policy](#)

Promoting products honestly

What we believe

We're honest, open, and proud when we share the benefits of BD products, solutions, and services with customers and patients. We build trust and confidence in our products and technologies by promoting products honestly and supporting our claims with evidence.

Why it matters

Long-lasting customer relationships and our good reputation depend on trust supported by integrity. So we're honest and open about our products and technologies, and we never mislead our customers. Product advertising and promotion are also subject to strict legal requirements, including that all advertising and promotional claims must be on-label, truthful, not misleading, and not unfair or deceptive.



How we do what is right

✓ Do:

- Promote only products authorized for sale in your country
- Make sure our labeling, advertising, and promotional materials meet all applicable requirements as set forth in BD policies
- Use only advertising and promotional material that has been properly approved in accordance with BD policies
- Make accurate, truthful, and balanced claims about our products backed up by appropriate product testing or clinical data
- Share information about reimbursement and health economics for our products that is honest and does not interfere with independent medical decisions

✗ Don't:

- Promote products before getting approval to market them
- Suggest or encourage any unapproved or off-label uses of products
- Exaggerate the benefits of our products and technologies or hide the potential risks of using them
- Make claims that are not supported by appropriate product testing or clinical data
- Make false or disparaging claims about competitors
- Make any changes to approved advertising or promotional material or create your own



Promoting products honestly (continued)

How we market our products

For BD to achieve its Purpose of *advancing the world of health™*, we must do what is right. The **Global Policy on Advertising and Promotion** sets out the principles and rules about how to create, review, and approve advertising and promotional materials for BD products to ensure compliance with all applicable laws and regulations, as well as to maintain our reputation for honesty with our customers.

BD provides guidance and more detail on the requirements for these areas related to advertising and promotion:

- Claim substantiation
- Disease awareness communications
- Internet-based platforms
- Presenting balanced product information in ad prom materials
- Promotion of Research Use Only (RUO) and Investigational Use Only (IUO) products
- Promotional distribution of publications
- Speaker programs and events
- Trade shows
- Use of case studies and testimonials in ad prom materials

Before we use any advertising and promotional materials, we must review and approve them according to the **Global Advertising and Promotion Review, Approval and Escalation Process**. BD associates may not change approved materials or create their own promotional materials.

Authentic answers



Q I found a news article online that discusses an amazing patient success story from using a BD product. Can I share this with customers?

A Although BD did not write the news article, if we use materials like this that are created by third parties, our regulators can hold us responsible for their content. This news story should not be shared with customers unless it is first reviewed and approved through the Global Advertising and Promotion Review, Approval and Escalation Process.



Get more information:

[Global Advertising and Promotion Review, Approval and Escalation Process](#)

[Global Policy on Advertising and Promotion](#)

[Product Complaint Form](#)

[Claim substantiation](#)

[Disease awareness communications](#)

[Internet-based platforms](#)

[Presenting balanced product information in ad prom materials](#)

[Promotion of RUO and IUO products](#)

[Promotional distribution of publications](#)

[Speaker programs and events](#)

[Trade shows](#)

[Use of case studies and testimonials in ad prom materials](#)

[Global Health Care Economic Information \(HCEI\) Policy](#)



Dealing ethically with third parties

What we believe

Our third-party partners are vital for our success, so we choose them carefully. At BD, a third party might include our distributors, service providers, or consultants, to name a few. We treat them with respect and expect them to meet our ethical standards. They must share our commitment to ethics and quality. They must also provide the best value for BD.

Why it matters

We work hard to build our reputation and earn the trust of our customers. It's important that partners working on our behalf help us protect that reputation and trust. That's because **under the many laws that apply to us**, we can be held responsible for anyone acting on our behalf.

How we do what is right



Do:

- Deal fairly and honestly with all third parties
- Choose third parties based on a legitimate business need and their qualifications to meet that need, not for improper purposes. Use an open and fair selection process.
- Let business partners know that we expect them to follow our values and applicable policies. Share our **[Global Antibribery & Anticorruption Policy](#)** and our **[Expectations for Suppliers](#)**.
- Avoid any possible conflicts of interest when choosing or dealing with third parties and disclose any personal relationships with third-party representatives

- Protect any confidential information we get from third parties and use it only for proper purposes
- Speak up if you suspect a third party is violating our Code or any of our policies
- Monitor third parties for as long as we work with them

⊗ Don't:

- Ask or let a third party do anything that violates our Code, policies, or the law
- Accept or offer bribes or kickbacks
- Work with a third party unless we've vetted them using our internal processes
- Make any side agreements like keeping business away from another supplier



Get more information:

[Global Antibribery & Anticorruption Policy](#)

[Global Third-Party Intermediary Life Cycle Management Policy](#)

[Expectations for Suppliers](#)

[BD Procurement Purchasing Policy](#)



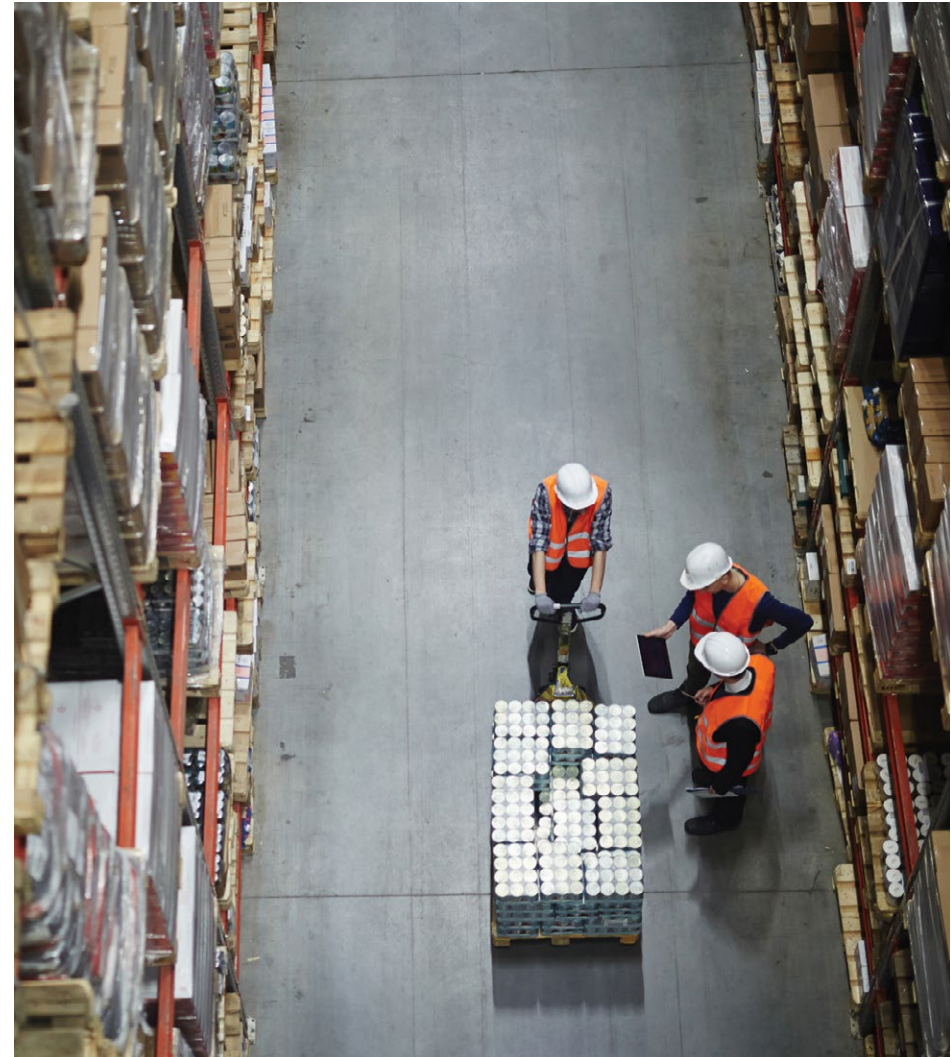
Following international trade laws

What we believe

We believe in thinking globally. As a global citizen, we follow all applicable international trade laws worldwide.

Why it matters

We operate all over the world. Our global business is subject to laws and trade restrictions for the import, export, and reexport of products, including software, technology, components, and raw materials. Following these laws helps maintain our reputation for fairness, honesty, and integrity. If we don't follow these laws, we can be subject to civil and criminal penalties that may include suspension or denial of international trade privileges.





Following international trade laws (continued)

How we do what is right

✓ Do:

- Know the import regulations related to marking and labeling of goods, valuation of goods, payment of duties, and record keeping for our products, services, and technology
- Know the requirements for export and reexport. An export can include physically or electronically sending a product or technology across an international border. An export can also be providing a service to someone in another country. Or it can even be just sharing information with a foreign national. Reexport generally involves the shipment or transmission of U.S. origin product or technology from one non-U.S. country to another.
- Know your customer and their use of our products and services
- Conduct risk assessments and due diligence checks on third parties with whom you intend to do business
- Accurately classify and report the value, quantity, and country of origin for all imports to customs officials, and use reasonable care with respect to import activities
- Alert the **Law Group** if a customer, supplier, or anyone else asks us to participate in a prohibited boycott
- Talk to **Global Trade** if you have any concerns or questions about international trade

✗ Don't:

- Do business with sanctioned countries/regions including Cuba, Iran, North Korea, Syria, or the Crimea region without Law Group approval
- Do business without proper approval with entities or individuals that are on restricted parties lists*
- Allow products to be sent to a different destination than originally planned unless such an arrangement is permitted under our policies

*The U.S. and other governments maintain lists that contain information about persons, foreign government agencies, companies, organizations, and other entities with which companies are restricted, in varying degrees, from engaging in trade transactions.



Following international trade laws (continued)

Advancing your knowledge



Anti-boycott laws

We must follow laws in the United States that prohibit participation in international boycotts that the U.S. government hasn't approved, such as the Arab League boycott of Israel. The law's scope is broad and complex, and may not allow us to:

- Do business with certain parties or countries
- Provide information about business relations with certain parties
- Pay, honor, or confirm letters of credit containing boycott provisions

Because anti-boycott laws are complex, talk to the **Law Group** right away about any requests that may deal with these issues.

Authentic answers



Q One of our distributors told me they can get our products into Syria by first shipping them to a country that does not have trade restrictions with Syria. He said it's above board. Can I do it?

A No. This is an example of product diversion and is an attempt to break contractual agreements, trade restrictions, or other regulations. Unless required by law, we also don't allow product diversion because it makes it harder for us to:

- Track our products
- Make sure there are adequate supplies in each region
- Follow international trade laws and other legal requirements



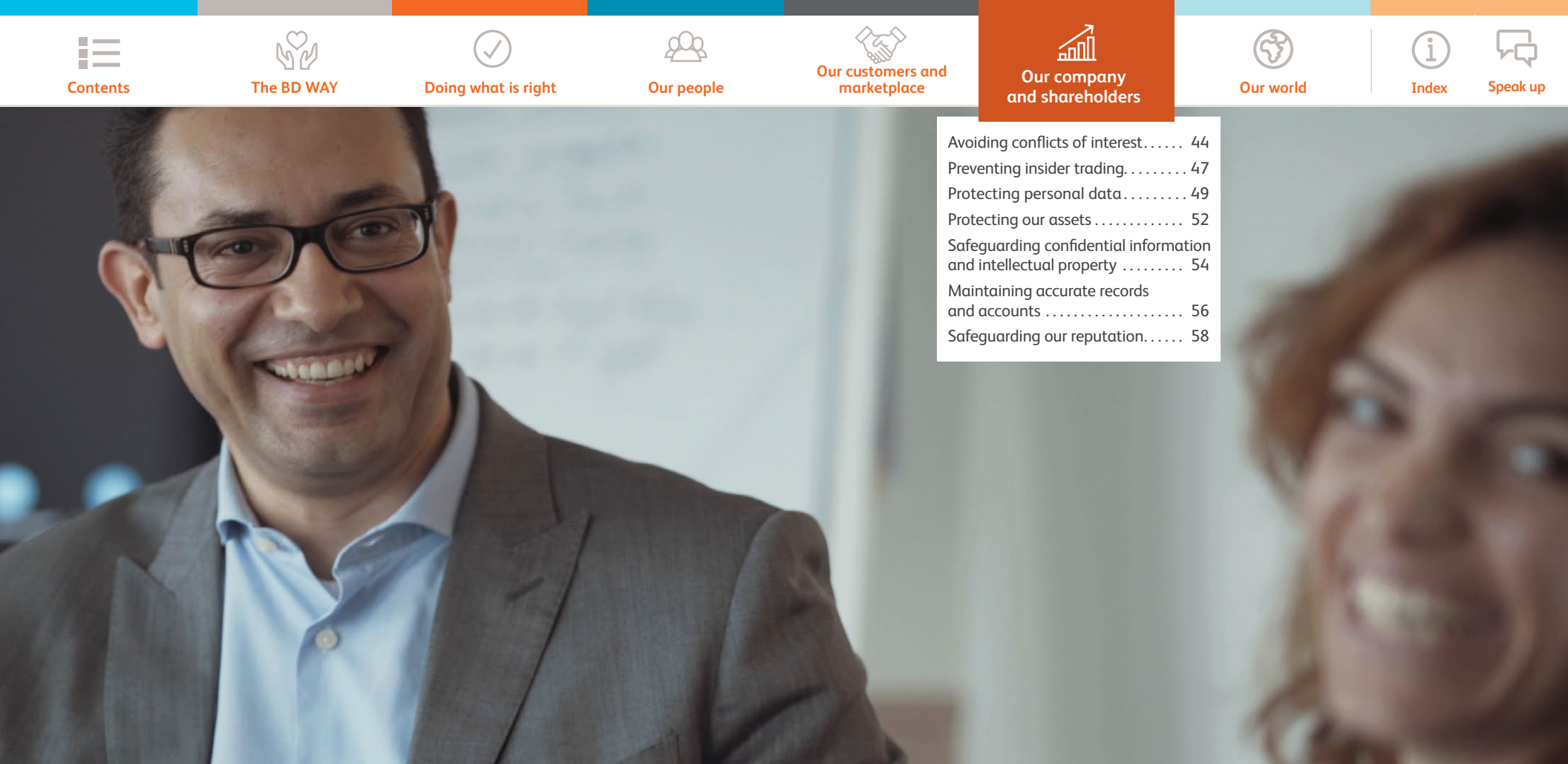
Get more information:

[Global Trade site](#)

[BD Trade Compliance Procedure](#)



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- Maintaining accurate records and accounts 56
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Our company and shareholders



When *advancing the world of health™*, we must protect the company and its value for shareholders. Each of us creates value for our company and its shareholders by acting in the company's best interests, protecting personal data and our assets, using assets properly, making sure our business records are accurate, and protecting our public image. Doing what is right in these ways will help create long-term success for our company and everyone with a stake in its future.



Avoiding conflicts of interest

What we believe

As associates, we are loyal and place the company's interests over our personal interests. We avoid conflicts, or the appearance of conflicts, between our personal interests and the company's interests.

Why it matters

How we act when we do business affects our reputation and the trust we have earned with stakeholders. Conflicts of interest can affect the decisions we make for BD or create the appearance of unfairness or bias in our jobs, which could hurt the trust we've built.

How we do what is right

✓ Do:

- Learn to recognize a potential conflict of interest
- Tell a manager or the **Ethics Office** right away about any situation that might be a conflict of interest. Most conflicts can be avoided or sorted out if managed properly and quickly.
- Ask for advice if you aren't sure whether something is a conflict of interest
- Check the **Global Conflicts of Interest Policy** for the most up to date information

✗ Don't:

- Use information obtained at work regarding a potential business opportunity to invest in or develop opportunity for personal gain

Advancing your knowledge



Some examples of potential conflicts of interest are:

- **Personal relationships:** You supervise or conduct business with a family member or with someone with whom you have a personal relationship
- **Outside activities:** You let a second job or activities with another organization hurt your performance, or get in the way of your role at BD
- **Use of BD assets:** You use BD property, information, or resources for personal benefit or to benefit others
- **Financial interests:** You or a family member invests in or has other financial interests in a company that does business or competes with BD (or wants to)
- **Business opportunities:** You take an opportunity that came to you as a result of your work with BD without first offering it to BD
- **Family members:** You let a family member get benefits they shouldn't, based on your position with BD
- **Accepting gifts:** You accept an improper gift from a supplier or vendor. See **Accepting Gifts and Entertainment from Suppliers** for more information.



Avoiding conflicts of interest (continued)



Advancing your knowledge



Is it a conflict of interest? Ask yourself:

- Will it get in the way of your job with BD?
- Will it impact your ability to make good and unbiased business decisions for BD?
- Will you use BD assets?
- Could you or a family member get something of value based on your position at BD?
- Could someone else reasonably worry there was a conflict of interest?
- Would the company's reputation be hurt if it became public?
- Would it pose an unfair advantage for BD?

Authentic answers



Q A vendor has asked me to join their advisory board, but I'm not sure if this represents a conflict of interest. What should I do?

A Outside work can create a potential conflict of interest. Serving on a vendor's advisory board may appear to give that company an unfair advantage. It may be okay, though, depending on the circumstances. You should tell your manager and talk with the **Ethics Office** about your situation to get guidance on whether or not you can participate.



Avoiding conflicts of interest (continued)

Accepting gifts and entertainment from suppliers

Strong relationships are important to our success at BD, and sometimes it may be polite and appropriate to accept modest gifts and hospitality, such as lunches or dinners.

The **BD Travel & Expense Policy** includes guidance on what we consider to be a modest meal and what is acceptable. Although associates can accept a meal while engaged in a business purpose, they should not accept meals that exceed the values listed in the **BD Travel & Expense Policy**, even if someone else is paying for the meal.

How we do what is right

✓ Do:

- Accept gifts or hospitality if they are nominal in value and infrequent
- Share gifts like promotional items or gift baskets with team members when possible
- Know that the rules for giving gifts to healthcare professionals, customers, or government officials are much stricter. See **Items provided to HCPs, HCOs, and Government Officials** for more information.

✗ Don't:

- Accept cash or cash equivalents, like gift cards
- Accept gifts or hospitality if they break any laws
- Accept gifts or hospitality if they affect or appear to affect your ability to make good, unbiased business decisions for BD
- Ask for gifts or hospitality

Advancing your knowledge



Acceptable gifts may include:

- Corporate logo items such as mugs, pens, T-shirts, etc.
- Regional or cultural gifts such as local souvenirs
- Holiday ornaments of nominal value
- Food gifts of nominal value such as fruit baskets



Get more information:

[Global Conflicts of Interest Policy](#)

[Items provided to HCPs, HCOs, and Government Officials](#)

[BD Travel & Expense Policy](#)



Preventing insider trading

What we believe

We do not engage in insider trading. We do not share information about BD or another company that isn't already public, and we never use that type of information for personal gain or to benefit anyone else.

Why it matters

Using material, nonpublic information to get financial benefit, often by buying or selling shares, is unfair, distorts markets, and erodes the trust of our customers and their patients. It's a serious violation that can carry significant penalties, including termination of employment, fines, and even imprisonment.

How we do what is right

✓ Do:

- Learn what insider trading is—see “[What is insider trading?](#)” for more information
- Protect inside information from being released or distributed
- Share inside information with BD associates only if they need to know

✗ Don't:

- Buy or sell BD or other companies' shares or securities based on inside information or during a blackout period
- Engage in “tipping” or share inside information with others so they can profit from it

Authentic answers



Q While I was having dinner with my extended family, my uncle asked, “Anything new at work?” I said, “Some big changes are coming. The FDA is going to approve a new device. Business is going to be booming!” Was it okay to share this information?

A No. It may have seemed like you were just making conversation, but this is an example of “tipping.” You shared material, nonpublic information. If your uncle used that knowledge to buy BD stock, that would be insider trading.



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Preventing insider trading (continued)

Advancing your knowledge



What is insider trading?

Insider trading is when you buy or sell stocks or other securities based on inside information—what is called “material, nonpublic information”—or when you share that information with someone who then trades (also known as “tipping”).

Material information is knowledge that may affect the price of a stock or security or that an investor would likely consider important when deciding whether to buy, sell, or hold stocks or securities.

Nonpublic information (or “inside information”) is knowledge that only people within the company or associated with the company are aware of. Information is considered public 24 hours after it has been released to the market.

Examples of inside information for BD:

- Changes in senior management
- Approvals, launches, recalls, or other significant events regarding our products
- Government investigations
- Market and customer strategies
- Financial results, projections, and forecasts
- Plans for joint ventures, mergers, acquisitions, or divestitures
- Unannounced stock splits or stock repurchases
- Increases or decreases in dividends paid by BD



Get more information:

[Insider Trading and Securities Transactions Policy](#)
[Corporate Secretary site](#)



Protecting personal data

What we believe

We believe in making sure that personal data entrusted to us stays that way. It doesn't matter whether that personal data belongs to associates or third parties, or is protected health information (PHI) of patients. We collect, use, keep, and share personal data in compliance with privacy laws.

Why it matters

Our success in *advancing the world of health™* means that sometimes we need to access, use, and share some types of personal data. Our customers, their patients, and our associates trust us with their personal data. We will only be able to keep that trust if we protect their privacy, honor the promises we make to use their personal data in appropriate ways, and keep that personal data safe.

Privacy laws such as the Health Insurance Portability and Accountability Act of 1996 (HIPAA) in the U.S., the European Union's General Data Protection Regulation (GDPR), and other global or regional privacy laws set conditions on how we can use and share personal data and how to protect it. As new privacy laws evolve rapidly, we are working to make GDPR privacy practices a model for our global privacy program.



Protecting personal data (continued)

How we do what is right

✔ Do:

- Understand whether your job responsibilities require you to handle personal data especially in the case of protected health information
- Understand and follow all privacy and data protection laws, such as HIPAA and GDPR
- Use, access, or share personal data only for legitimate business purposes and in compliance with the law and BD policies
- Ensure that privacy considerations are addressed throughout each step of the information life cycle: collection, use, disclosure, retention, and destruction of personal data
- Tell your manager or the **Privacy Office** right away about any potential loss or exposure of personal data
- Protect personal data contained in our products and software technologies, following a privacy-by-design approach during the entire process from the design and concept phase to post-sales support
- Maintain reasonable and appropriate administrative, technical, and physical safeguards needed to protect protected health information (PHI) stored electronically (e-PHI) or in other forms

- Know that personal data is anything that can be used alone or combined with other available knowledge, to identify a person. This includes, but is not limited to, things like:

- Name
- Date of birth
- Place of birth
- Employee or government ID number
- Patient ID number
- Physical or email address
- Photographs or videos
- Physical characteristics such as height or weight
- Medical conditions and treatment
- Race and ethnicity

✘ Don't:

- Share personal data with any person who doesn't have a business need to know, even if they're authorized to get it
- Share personal data with any other company or individual unless we have a written agreement and they have appropriate controls in place to protect it

Protecting personal data (continued)

Innovation through integrity



BD includes product security in our development process. For example, in networked products, we test security by attempting to hack the product, along with probing product security management plans, sending out patches to improve security, and thinking about how to manage any weak spots. Our Product Security team uses a three-pronged strategy to make sure our products are:

- Secure by design
- Secure in use
- Secure through partnership, by working with customers



Advancing your knowledge



What is a personal data breach?

A personal data breach is when personal data is exposed to people not allowed to see or use it and it leads to the unauthorized destruction, loss, change, disclosure, or access of the personal data.

Examples include:

- Access by someone who is not allowed to see it
- When personal data is sent to the wrong person
- Loss or theft of a laptop or phone containing personal data
- Changes to personal data without permission
- When access to personal data is lost

If you suspect a personal data breach, contact your manager, the **Privacy Office**, the **Ethics Office**, or the **Ethics Helpline** right away.

Get more information:

[Global Privacy Policy](#)

[GDPR Data Protection Policy](#)

[HIPAA Privacy, Security, and Breach Notification Rules – Policies and Procedures](#)

[Product Security policy](#)



Protecting our assets

What we believe

We take care of the things we own so that we can make sure product innovations and improvements can continue. This is one way we can help our customers and meet the needs of patients around the world.

Why it matters

Our company’s assets, simply put, are what we own. They’re the result of the investment, innovation, and hard work of our associates, past and present. They’re a vital part of efforts to make sure patient health advances and BD continues to profit and maintain a competitive advantage.

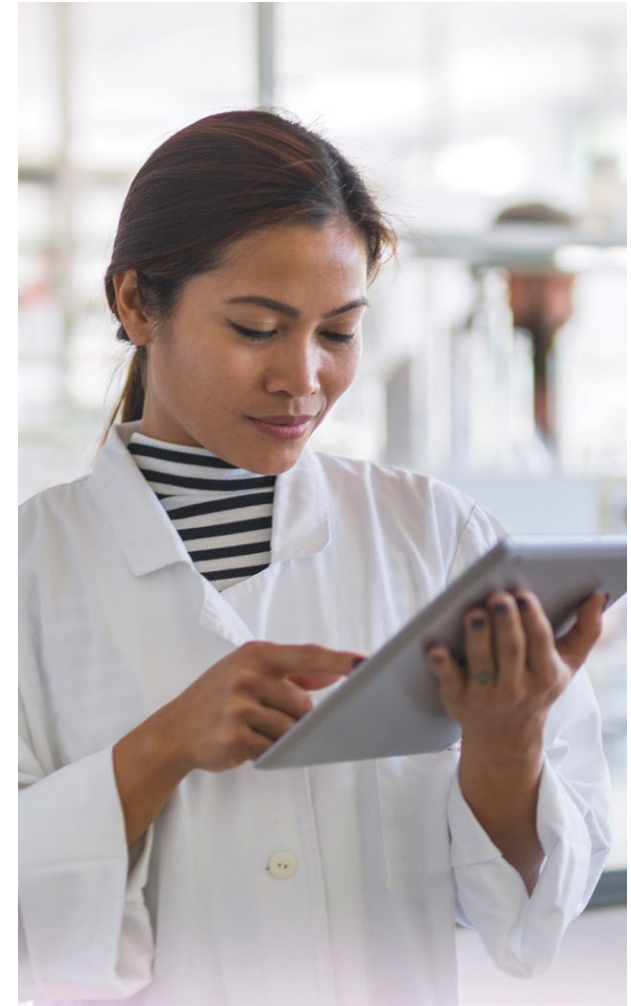
How we do what is right

✓ Do:

- Treat BD assets as you would your own
- Take reasonable steps to make sure BD assets aren’t damaged, abused, wasted, lost, stolen, or improperly transferred outside BD
- Use information and communications systems, and the electronic data they contain, in a responsible manner
- Always handle our funds honestly and responsibly, and follow our policies
- Tell your manager or the **Law Group** about any abuse or misuse of our assets

✗ Don’t:

- Take any of our assets away from our facilities for personal use
- Allow unauthorized people—including friends and family—to use our assets





Protecting our assets (continued)

Advancing your knowledge



Assets come in many forms. Some examples include:

- **Physical assets** such as land, buildings, office supplies, furnishings, machinery, chemicals, warehouse equipment, documents, vehicles, computer equipment, and phones
- **Electronic assets** such as data and files contained in our systems and servers
- **Financial assets** such as money and anything that can be converted to money, like stocks, bonds, loans, and deposits
- **Information assets** such as any information or data related to BD business, including personal data
- **Intangible and other assets** such as ideas, inventions, copyrights, trademarks, patents, trade secrets, our brand, and our reputation

Authentic answers



Q In my spare time, I have an online business selling collectibles. When I have downtime at work, I sometimes check the status of orders and respond to customer questions. Since it doesn't interfere with my work, is this okay?

A While associates can use our computer network for modest nonbusiness purposes, you can't use our assets, including computers, for your own business. You're also not allowed to use our computers to visit websites with content that's not suitable for the workplace (for example, sexual content) or to stream nonbusiness videos.



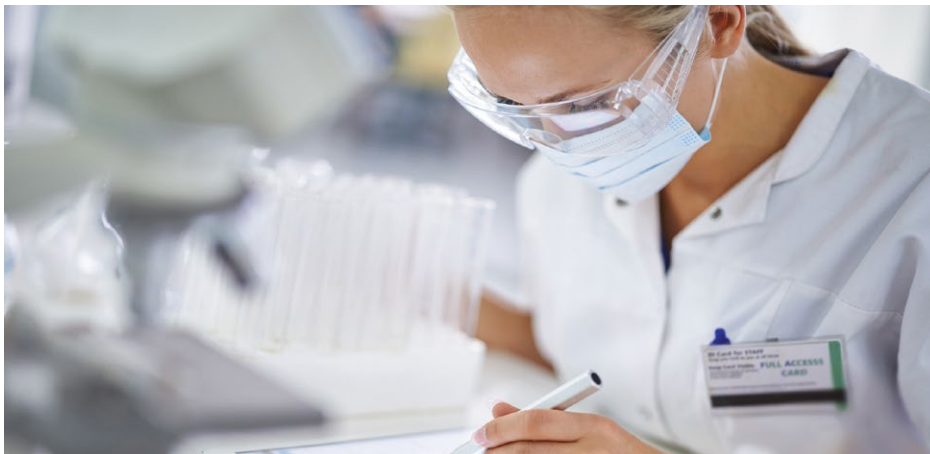
Safeguarding confidential information and intellectual property

What we believe

Part of what gives us an advantage over our competitors is our confidential business information and our ideas and knowledge—what’s often called intellectual property or IP. We must protect our intellectual property from being shared without permission or from being misused.

Why it matters

Our confidential information and intellectual property are among our most valuable assets. Advancement in healthcare as well as our success depend on improving and developing new products and technology. We maintain our competitive advantage and enhance our impact on society by protecting the confidential information and knowledge we own.



How we do what is right

We must all protect our confidential business information and intellectual property.

✔ Do:

- Make sure documents, data, and devices are safe. Use physical measures like locked doors or drawers, as well as passwords and encryption for electronic data.
- Know what information is confidential, what restrictions apply, how long to keep it, and how to get rid of it properly
- Make sure that only people with permission visit our buildings and factories, and that they have escorts and do not enter areas that are off limits
- Tell a manager or the **Law Group** if any information is released or exposed when it shouldn’t have been, so we can address the problem promptly and properly

✘ Don’t:

- Share confidential or proprietary information with others—even inside our company—unless they are allowed to and have a legitimate business need to see the information
- Discuss confidential matters in public places, like elevators, trains, or restaurants
- Make it easy for people to view confidential information (for example, by working on a laptop on an airplane or using an unsecured Wi-Fi network)
- Share passwords for our network, phones, or laptops
- Download files without proper permission to an external device (such as a USB)



Safeguarding confidential information and intellectual property (continued)

Advancing your knowledge



Confidential information includes:

- Proprietary information, such as industrial designs and chemical formulas
- Trade secrets and other intellectual property
- Financial information that isn't public, including pricing and projections
- Sales and marketing plans
- Customer and supplier lists
- Research and development ideas and information
- Manufacturing processes
- Procurement information
- Associate information, such as compensation data
- Information concerning potential acquisitions, investments, and divestitures
- Legal opinions and attorney work product



Authentic answers



Q I sometimes work remotely, so I email the documents I need to my personal email account for easy access. I particularly like to work at my neighborhood coffee shop. Is this okay?

A No. We are all responsible for protecting our confidential information and intellectual property. You should never email confidential or proprietary documents to your personal email for many reasons, but most importantly because it is not secure. Also, you should never use a public Wi-Fi network to download confidential documents. You should even make sure your home network meets the requirements needed to keep our information secure.



Get more information:

[Trade Secret Policy](#)

[BD Information Security Policy](#)

[BD Information Security Standards](#)



Maintaining accurate records and accounts

What we believe

We believe in keeping good records. We keep honest, complete, and accurate records so we can make responsible business decisions and be honest with investors and government agencies.

Why it matters

Keeping reliable records helps us make good business decisions and improves our efficiency. Also, as a public company, BD is required by securities laws to maintain accurate records and to disclose information about our business and financial performance in a timely manner. Doing that well helps fulfill our obligations and keeps the confidence of shareholders, customers, business partners, and other stakeholders.



Maintaining accurate records and accounts (continued)

How we do what is right

Do:

- Comply with generally accepted accounting principles, internal controls, policies, and all relevant laws and regulations
- Maintain documents that honestly reflect financial transactions, without material misstatement, exaggeration, or unsubstantiated estimates
- Record all accounting entries and business transactions completely, accurately, in a timely manner, and in the proper period
- Submit accurate records to internal and external auditors on time
- Tell your manager about anything that may be inaccurate, false, or misleading

Don't:

- Use any cash funds or other assets or liabilities that are secret or unrecorded
- Mislead or misinform anyone about our business operations or finances
- Create false documents or violate our Code because of any actual or perceived pressure to achieve a financial goal
- Agree to any contracts with terms and conditions that don't properly reflect the actual relationship
- Destroy documents we should retain to meet our financial, legal, or tax obligations, unless permitted by BD policy

Authentic answers

Q I recently had a business dinner with work colleagues and my spouse attended. I paid for the entire meal on my company card. I did not list my spouse as an attendee on my expense report and did not reimburse the company because I didn't seek reimbursement for other business expenses that exceeded the cost of my spouse's dinner. Is this okay?

A No. Your expense report did not accurately reflect the expense. In addition, using your company credit card for any personal use is against our BD Travel & Expense Policy.



Get more information:

[BD Travel & Expense Policy](#)



Safeguarding our reputation

What we believe

We all have to protect our reputation by being positive and truthful when talking about our company.

Why it matters

Since our founding, we have built and maintained our reputation and trustworthiness. If we don't use one voice and share one message, it may hurt our company.

Communication with the media and investors

You should know that any discussion with someone outside our company—including social media posts—can be taken as an official company statement. Our customers, investors, and communities deserve accurate, complete, and clear information about BD. We have a specially trained group that's authorized to speak on behalf of our company.

How we do what is right

✓ Do:

- Refer all external questions to **Public Relations** unless you know for sure you're authorized to answer
- Tell your manager or **Public Relations** if you come across any information about our company or our products that's wrong

✗ Don't:

- Share your opinion or divulge information about our company, our customers, or our business partners

Authentic answers



Q I was at a trade show, and I was talking about our company with someone who I thought was a possible customer. It turned out she was a representative of a hedge fund that has invested in BD. I'm worried I did something wrong.

A If you kept to publicly available information, you're fine. But if you were talking about changes that aren't public, that could be an issue. It's important to remember that any discussion with an external source can be taken as an official statement. People at trade shows may be reporters or analysts. You should always ask for peoples' names and affiliation before starting a conversation, and never share nonpublic information with people outside of BD. You should also be up to date with public information if you're talking with anyone outside the company.





Safeguarding our reputation (continued)

Responsible use of social media

We embrace the power of social media, but take care not to share information or opinions that could hurt our company's reputation. Remember that online statements can be taken out of context, distorted, or misunderstood.

How we do what is right

✓ Do:

- Use social media in ways consistent with our values and policies
- Feel free to share any posts made from an official BD account
- Report any negative post about our company to **Public Relations**
- Be aware that your comments on social media could be copied by others and shared, even if you delete them or they disappear

✗ Don't:

- Make negative or inaccurate remarks about BD
- Represent your personal views as those of BD
- Share confidential information, whether it's ours or from our customers, business partners, or competitors
- Engage in inflammatory online exchanges with anyone disparaging the company or its products
- Make statements that could in any way be construed as a product claim

Get more information:

[Social Media Personal Associate Use Guidelines](#)



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The BD WAY



Doing what is right



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Our customers and marketplace



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Our world



We are passionate about *advancing the world of health™*. That passion drives a strong commitment to promoting human health, protecting the global environment, and improving the communities we serve. We work to improve the communities where our patients and their caregivers live and work. We are dedicated to preserving and protecting the environment. Being a responsible global citizen leads to long-term, sustainable success for the company and all of our stakeholders.

To learn more about how BD is making a difference in this area, please visit www.bd.com/sustainability.

Contributing to our communities

What we believe

We believe in supporting the communities where we live and work. We also want to address broader healthcare challenges in society. We encourage our associates to get involved in these efforts.

Why it matters

Our success depends on our reputation. In part, our reputation is formed by what we do for our associates, patients, customers, communities, and the world at large. And social investing is an important part of building and maintaining our reputation for always *advancing the world of health™*.

How we do what is right

✓ Do:

- Support causes and non-profit organizations that are consistent with our Purpose or that support health and well-being around the world and in the communities in which our associates work and live
- Explore volunteer opportunities and charitable activities that enhance engagement with your community, and those that help you better understand and serve the needs of the most vulnerable populations, locally and globally

✗ Don't:

- Force others to contribute to charitable organizations or other community activities



🔗 Get more information:

[Global External Funding Policy](#)

[Social Investing site](#)

[BD Matching Gift Program \(for U.S. associates\)](#)

[Volunteer resources](#)

[Volunteer awards](#)

Contributing to our communities (continued)

Charitable contributions, grants, and donations

We use our resources, time, and skills to help non-profit groups, such as those that seek to expand access to healthcare, advance human potential, and help vulnerable communities increase their resiliency.

How we do what is right

Do:

- Make contributions, grants, or donations to charitable, education, or research organizations
- Encourage individuals or organizations requesting charitable or educational grants to follow our **Global External Funding Policy**
- Keep records of all contributions, grants, or donations

Don't:

- Make contributions, grants, or donations to influence someone to buy, lease, recommend, or prescribe our products
- Provide contributions, grants, or donations to individual healthcare professionals (HCPs) or government officials (GOs) for any purpose
- Make a promise to make a contribution, grant, or donation on behalf of our company unless you are authorized to do so



Get more information:

Global External Funding Policy

Authentic answers

Q A BD customer asked me if we can help with a charitable trip they are planning. It would provide healthcare to patients who can't afford it. A non-profit part of the customer's organization would manage the trip. They asked if BD can support the trip with free of charge products and a cash donation. Can we do it?

A We believe that supporting worthy charitable causes that help improve healthcare is part of our Purpose, *advancing the world of health™*. We may be able to support a charitable cause like this trip if we follow our policies and procedures. Contact **Social Investing** or an **Ethics & Compliance** representative for more information.





Advancing your knowledge



To support human rights, we make the following commitments in all we do.

- We provide a safe and healthy workplace
- We do not use child labor
- We do not use forced or indentured labor of any kind
- We do not allow discrimination in our hiring
- We do not allow abuse, harassment, or threats
- We support the freedom of association and the rights of workers and employers to bargain collectively



Respecting human rights

What we believe

We protect human rights in all areas of our business. We believe that all people should be treated with dignity and respect, and we expect our business partners to do the same.

Why it matters

As a responsible global citizen, we believe in safeguarding human rights in everything we do. We never engage in human trafficking, forced labor, child labor, or unsafe or unfair work practices.

How we do what is right

✓ Do:

- Follow our **Global Human Rights Policy**, which is based on the UN Universal Declaration of Human Rights, and the laws that apply
- Help us keep working conditions safe and healthy and maintain fair and proper compensation for all BD associates
- Make sure our suppliers are committed to proper labor and sustainable sourcing practices that protect workers and communities (get the details in our **Expectations for Suppliers**)
- Alert your supervisor or the **Ethics Office** when you see or suspect human rights concerns

🔗 Get more information:

- [Global Human Rights Policy](#)
- [Expectations for Suppliers](#)



Protecting the environment

What we believe

We believe in environmental responsibility and accountability. That's because we understand that environmental performance can have an impact on human health.

Why it matters

Climate change and population growth are placing great demands on natural resources and bringing new challenges to our business and operations. Increasing regulatory requirements and customer expectations require us to consider the environmental impact of our business and minimize our environmental footprint.

How we do what is right

✓ Do:

- Follow all environmental laws and BD policies and procedures
- Safely dispose of any hazardous waste and report any spills or leaks
- Look for ways to be more efficient and safeguard energy and other resources
- Tell the **Environment, Health and Safety** department about any environmental concern



Get more information:

[Environment, Health and Safety policy](#)

[Sustainability and Climate Change Management reports](#)



Participating in the political process

What we believe

We believe in a system in which we are free to engage in the political process. We participate in the political process ethically and transparently, and we separate our personal political activities from our work at BD.

Why it matters

We believe that an open political process makes for a fairer, more efficient, and more productive society. We use our skills, knowledge, and global reach to help advance public policy.

How we do what is right

✓ Do:

- Talk to BD public affairs professionals to make sure you're behaving ethically and legally when dealing with elected or appointed officials on behalf of the company
- Make it clear that your opinions are your own when taking part in personal political activity

✗ Don't:

- Use company money to support candidates, political parties, ballot measures, and referendum campaigns

Advancing your knowledge



How does BD engage in the political process?

We have a team of public affairs professionals who work closely with country and business leaders to engage in policy discussions relevant to what we do. We only participate in advocacy activities that help our Purpose of *advancing the world of health™*, without being influenced by the personal political affiliations or views of anyone working at BD.

We support regulatory and reimbursement framework that make sure medical technologies are safe and work well, while also giving patients access to them in a timely manner. We also support sensible tax and trade policies that improve competitiveness and innovation and seek to promote a sustainable healthcare ecosystem.

We run a political action committee (PAC) in the United States. The BD PAC lets eligible U.S. associates voluntarily give their own money to candidates for elected office who share our position on public policy issues.



Get more information:

[Participation in the Political Process](#)



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The BD WAY



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Speak up



Conclusion



BD has built a reputation for quality and integrity that is the foundation of our success. Maintaining this most valuable asset is of the greatest importance to our continued progress, and is a responsibility we all share.

Our commitment

Acting with integrity is critical to the company's success and reputation. Our commitment extends beyond compliance with the law. **We believe that the best way to be a great company and to deliver value to our customers, associates, and shareholders is to be fair, honest, and ethical in our business practices and behavior at work.**



Speaking up

We encourage and expect all associates to speak up and report actual or suspected violations of laws, the Code, BD policies, or relevant industry codes. If you're unsure about how to handle a specific situation, or if you find any aspect of the Code unclear, there are a number of ways you can **ask questions, raise concerns, or seek guidance**, such as:



Using the online reporting tool at: www.bd.ethicspoint.com



Calling the [Ethics Helpline](#)—you can find the right local or international number on Maxwell, our intranet site



Emailing the Ethics Office: ethicsoffice@bd.com



Talking to your manager or a neutral and uninvolved manager if you'd prefer



Contacting a representative in [Ethics & Compliance](#), [Human Resources](#), [AccessHR](#), [Law Group](#), or [Internal Audit](#)



Accessing the [ethics@work](#) app on your mobile device to connect with Ethics & Compliance resources anywhere, anytime

BD does not tolerate retaliation in any form and will always make every reasonable effort to protect your confidentiality.



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