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**United States**  
**Securities and Exchange Commission**  
Washington, D.C. 20549

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**FORM SD**

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**SPECIALIZED DISCLOSURE REPORT**

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**Becton, Dickinson and Company**

(Exact name of registrant as specified in its charter)

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**New Jersey**  
(State or other jurisdiction of  
incorporation or organization)

**001-4802**  
(Commission  
File Number)

**22-0760120**  
(IRS Employer  
Identification No.)

**1 Becton Drive**  
**Franklin Lakes, New Jersey**  
(Address of principal executive offices)

**07417-1880**  
(Zip Code)

**Maureen Mazurek**  
**(314) 3781251**  
(Name and telephone number, including area code, of the person to contact in connection with this report.)

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Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

☒ Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2024

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**Section 1 – Conflict Minerals Disclosure****Item 1.01      Conflict Minerals Disclosure and Report**

As contemplated by Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD, a Conflict Minerals Report is provided as an Exhibit to this Form SD and is available at the following Internet website: <https://investors.bd.com/financial-information/sec-filings>. The information contained on our website is not incorporated by reference into this Form SD or our Conflict Minerals Report and should not be considered part of this Form SD or the Conflict Minerals Report.

Information concerning tin, tantalum, tungsten, or gold from recycled or scrap sources that may be contained in our in-scope products is included in the Conflict Minerals Report and is incorporated in this Form SD by reference.

**Item 1.02      Exhibit**

The Conflict Minerals Report contemplated by Item 1.01 is filed as Exhibit 1.01 to this Form SD.

**Section 2 – Exhibits****Item 2.01      Exhibits**

Exhibit 1.01 – Conflict Minerals Report for the calendar year ended December 31, 2024.

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## SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

Becton, Dickinson and Company  
(Registrant)

By: David Shan  
Name: David Shan  
Title: Executive Vice President, Chief Integrated Supply Chain Officer

May 27th, 2025

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## EXHIBIT INDEX

<u>Exhibit</u>	<u>Description</u>
1.01	<a href="#"><u>Conflict Minerals Report for the calendar year ended December 31,2024.</u></a>

**Conflict Minerals Report**

Becton, Dickinson and Company has included this Conflict Minerals Report as an exhibit to its Form SD for 2024, as contemplated by Rule 3p-1 under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), and Form SD (collectively, the “Conflict Minerals Rule”). The date of filing of this Conflict Minerals Report is May 27th, 2025.

The term “BD,” “we,” “us” and “our” refer to Becton, Dickinson and Company and its consolidated subsidiaries for or at the end of 2024. 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. The “Conflict Affected Region” is defined as the Democratic Republic of the Congo and its adjacent countries, which include Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

**Overview**

BD is one of the largest global medical technology companies in the world and is advancing the world of health by improving medical discovery, diagnostics and the delivery of care. The company develops innovative technology, services and solutions that help advance both clinical therapy for patients and clinical process for health care providers. BD has more than 70,000 employees and a presence in virtually every country around the world to address some of the most challenging global health issues. BD helps customers enhance outcomes, lower costs, increase efficiencies, improve safety and expand access to health care.

In September 2024, BD acquired the Critical Care business of Edwards Lifesciences Corporation which is included in our 3TG compliance and reflected in the Conflict Minerals Report for this reporting period.

BD is subject to the Conflict Minerals Rule because, for 2024, certain of the raw materials and components contained in some of the products that we manufactured or contracted to manufacture contained 3TG that were necessary to the functionality or production of the products. Many of our products do not contain any 3TG or are otherwise not in-scope for purposes of our Conflict Minerals Rule compliance.

We do not directly source 3TG from mines, smelters, or refiners, and we believe that we are many levels removed from these market participants. However, through the efforts described in this Conflict Minerals Report, we seek to ensure that our sourcing practices are consistent with our Conflict Minerals Policy, which is described below.

**Our Conflict Minerals Policy**

BD will comply with the Conflict Minerals Rule and expects its suppliers and subcontractors to source responsibly, respect human rights and minimize adverse environmental impacts.

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Without limiting the foregoing, BD expects that its suppliers and subcontractors will not knowingly source Conflict Minerals or 3TG from sources that directly or indirectly finance or benefit armed groups in the Conflict Affected Region. In furtherance of this expectation and BD's obligations under 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. Applicable BD suppliers and subcontractors (as defined by BD's Supply Base 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").

In cases where suppliers or subcontractors are found to not comply with our Policy, we intend to 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.

#### **Reasonable Country of Origin Inquiry; Smelter and Refiner and Country of Origin Information**

As required by the Conflict Minerals Rule, for 2024, we conducted a "reasonable country of origin inquiry." Our outreach included 1458 suppliers (the "Suppliers") that were identified through our internal scoping processes as having provided, or that we believe may have provided, us with raw materials or components that contain 3TG. Suppliers representing approximately 93% of BD's in-scope spend responded to BD's reasonable country of origin inquiry.

For 2024, our Suppliers identified to us the 363 smelters and refiners as potentially having processed the necessary 3TG contained in our in-scope products. We were able to determine the origin of only a portion (if any) of the necessary Conflict Minerals contained in each of our in-scope products.

Of these 363 smelters that were identified to us by the Suppliers:

- 76 of these smelters process tin, and 55 of these smelters are listed by the RMI as Conformant.
- 47 of these smelters process tantalum, and, of these 42 are listed as Conformant.
- 58 of these smelters process tungsten, and, of these 38 are listed as Conformant.
- 182 of these smelters process gold, and, of these 92 are listed as Conformant.

"Conformant" means that the smelter or refiner has successfully completed an assessment against the applicable RMI Responsible Minerals Assurance Process ("RMAP") standard or an equivalent cross-recognized assessment. Included smelters and refiners were not necessarily Conformant for all or part of 2024 and may not continue to be Conformant for any future period.

The compliance status reflected above is based solely on information made publicly available by the RMI, without independent verification by us. All information above is as of March 28, 2025.

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The smelters and refiners were identified by the Suppliers as being part of our 2024 supply chain. Some of the Suppliers may have reported to us smelters and refiners that were not in our supply chain (i) since they reported at a “company level,” meaning that they reported to us the 3TG contained in all of their products, not just the products that they sold to us, or (ii) due to over-inclusiveness in the information received from their suppliers. In addition, the smelters and refiners reflected above may not be all of the smelters and refiners in our 2024 supply chain, since many of the Suppliers were unable to identify all of the smelters and refiners used to process the necessary 3TG content contained in our in-scope products and because not all of the Suppliers responded to our inquiries.

Based on the results of our reasonable country of origin inquiry, we conducted due diligence for 2024. These due diligence efforts are discussed later in this Conflict Minerals Report.

There are 30 suppliers reported by Edwards Lifesciences Corporation for the Critical Care business which identified 342 smelters. Forty-nine of these smelters are sourcing or there is reason to believe they may be sourcing from the Covered Countries. Thirty-four of these smelters are RMAP Conformant.

### ***Conclusion Statement***

We did not conclude that any of our products were “DRC conflict free.” The term “DRC conflict free” has the meaning contained in the Conflict Minerals Rule.

### **Due Diligence Program**

#### ***Design Framework***

Our due diligence measures relating to 3TG were designed to conform with the criteria set forth in the OECD Guidance, including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (Third Edition).

#### ***Selected Elements of Due Diligence Program***

The OECD Guidance has established a framework for due diligence as a basis for responsible global supply chain management of minerals from conflict-affected and high-risk areas. Selected elements of our program are discussed below. However, these are not all the elements of the program that we have designed to ensure that the 3TG contained in our products are responsibly sourced.

#### ***Conflict Minerals Policy***

BD’s Conflict Minerals Policy, as described in this Conflict Minerals Report, is available on our website at [https://www.bd.com/content/dam/bd-assets/bd-com/en-us/document/policy/corporate-policies-and-guidelines/report/bd\\_conflict-minerals-policy\\_en.pdf](https://www.bd.com/content/dam/bd-assets/bd-com/en-us/document/policy/corporate-policies-and-guidelines/report/bd_conflict-minerals-policy_en.pdf).

#### ***Conflict Minerals Teams***

We have a centralized Conflict Minerals Team (the “Core Team”) to provide cross-functional support for the 3TG compliance program. The Core Team is comprised of representatives from Global Procurement, EHS, Sustainability and Product Stewardship, and business units with products likely to contain 3TG. The Core Team is led by the Conflict Minerals Program Leader with support and oversight from the Senior Director, Product Stewardship Compliance. Executive leadership of the Conflict Minerals Program resides with EHS, Sustainability and Product Stewardship.

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We also have a Conflict Minerals Steering Team (the “Steering Team”) responsible for overseeing compliance. The Steering Team also engages with functional leadership around progress, reviewing and approving internal and external policy language, and collaborating with necessary third-party resources. The Steering Team consists of the Program Leader, Executive Leader and representatives from the Law Group and Global Procurement.

#### *Internal and External Communication of Conflict Minerals Program and Training*

We communicate to selected associates our commitment to comply with the Conflict Minerals Rule, in writing and through training sessions and other live communications. In addition, applicable associates are educated on the Conflict Minerals Rule and our compliance program.

Applicable suppliers and subcontractors are provided with information on the Conflict Minerals Rule, our commitment to compliance with the Rule and/or our sourcing expectations. This is done in writing, through meetings and other live communications and/or through contractual requirements.

#### *Participation in and Support of Multi-Stakeholder Initiatives*

We are a member of the Responsible Minerals Initiative (“RMI”). BD participates on the RMI’s Due Diligence team.

#### *Data Storage and Retention*

We utilize an internal database and an external data platform for the maintenance of business records relating to 3TG due diligence, including records of due diligence processes, findings and resulting decisions. These records are maintained for 5 years.

#### *Contractual Compliance Requirements*

We include provisions in certain purchase orders and contracts requiring suppliers to provide information to support our compliance efforts under the Conflict Minerals Rule. In addition, BD’s Expectations for Suppliers, which contains our supplier compliance requirements relating to many different subject areas, includes compliance requirements relating to 3TG.

#### *Grievance Mechanisms*

We have grievance mechanisms for employees, suppliers, and other interested parties to report alleged violations of our Conflict Minerals Policy and other related policies and we publicly communicate our grievance mechanisms. Any grievances received are communicated to the Program Leader and Steering Team. Associates, suppliers, and other interested parties can report actions inconsistent with the Expectations for Suppliers through our Global Ethics Help Line, the number of which is 1-800-821-5452. Under our internal procedures, all such calls will be investigated.



Suppliers that BD determines to be in-scope are requested to complete a Conflict Minerals Reporting Template (“CMRT”), which contains questions on the inclusion and source of 3TG in the materials they supplied to us and their compliance activities. For 2024, BD sent requests to 1458 Suppliers to provide us with a completed CMRT. We followed up by email or phone with the Suppliers that did not provide a response within a specified time frame. If the Supplier still did not respond to our request or refused to respond, this information was forwarded to Global Procurement or local buyers at manufacturing plants to assist as part of an escalation process.

Upon receipt of a CMRT from a Supplier, the response was processed through our Supplier Response Analysis process. We reviewed the completed responses received from the Suppliers based on our “red flags” review criteria and for errors and inaccuracies. Additionally, we reviewed submitted CMRTs for certain errors and inaccuracies and followed up with these Suppliers as well.

We reviewed the smelters and refiners identified to us by the Suppliers against those contained on the SmelterLook-up tab of the CMRT and the RMI smelter database, which includes information published by RMI, the Responsible Jewellery Council and the London Bullion Market Association.

To the extent that a completed response identified a smelter or refiner, we also reviewed that information against the lists of conformant and active (or the equivalent) smelters and refiners published by the RMI as of March 28, 2025. To the extent that a smelter or refiner identified by a Supplier was not listed as conformant or the equivalent by the RMI, we consulted publicly available information to attempt to determine whether the smelter or refiner obtained 3TG from sources that directly or indirectly financed or benefitted armed groups in the Conflict Affected Region. See “Reasonable Country of Origin Inquiry: Smelter and Refiner and Country of Origin Information”.

Based on the information furnished by the Suppliers and other information known to us, we assessed the risk of adverse impacts. The Steering Team reported the findings of its supply chain risk assessment to senior management. We determined on a case-by-case basis the appropriate mitigation strategy for any identified non-compliance with our Conflict Minerals Policy and other supplier requirements and expectations relating to our 3TG compliance program. Potential outcomes under our mitigation strategy include continuing to work with the supplier while non-compliances are addressed or suspending or terminating the relationship with the supplier. Under our mitigation strategy, to the extent that areas of non-compliance that require mitigation are identified, we monitor and track the performance of the mitigation efforts and report back to appropriate senior oversight personnel. Under our procedures, we also will undertake additional fact and risk assessments, as determined by the Steering Team, for non-compliances that require mitigation or after a change of circumstances.

In addition, to the extent that identified smelters or refiners are not listed as conformant, we seek to exercise leverage over the smelters and refiners to become conformant through our participation in and support of the RMI. We also utilize information provided by the RMI to its members to monitor smelter and refiner improvement.

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To mitigate the risk that the necessary 3TG contained in our in-scope products directly or indirectly finance or benefit armed groups in the Conflict Affected Region, in 2024, we also participated on the RMI's Due Diligence teams.

*Carry out Independent Third-party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain*

In connection with our due diligence, we utilize and rely on information made available by the RMI concerning independent third-party audits of smelters and refiners to assess smelter and refiner due diligence and to determine whether the smelter or refiner is conformant. We further support independent third-party audits through our membership in the RMI described herein.

*Report on Supply Chain Due Diligence*

We file a Form SD and a Conflict Minerals Report with the Securities and Exchange Commission and make these documents available on our website.

**Product Information**

In-scope products for 2024 included a broad range of electrical or electronic medical devices, laboratory equipment, diagnostic products, vascular products, urology products, oncology products and surgical specialty products we manufacture or contract to be manufactured. Not all of the products in each of these categories were in-scope for purposes of our compliance (i.e., not all of our products in these categories contain necessary 3TG or were manufactured or contracted to be manufactured by us).

For 2024, we were unable to determine at least a portion of the smelters and refiners and countries of origin of the necessary 3TG contained in each of our in-scope products. Identified smelters and refiners and country of origin information are described under "Reasonable Country of Origin Inquiry; Smelter and Refiner and Country of Origin Information".

**Additional Mitigation Efforts**

In respect of 2025, we have taken or intend to take the following additional steps to mitigate the risk that the necessary 3TG contained in our in-scope products finance or benefit armed groups:

- Monitor and encourage the continuing development and progress of traceability measures at Suppliers that indicated for 2024 that the source of 3TG was unknown or undeterminable.
- Continue to contribute to the RMI due diligence.

The foregoing steps are in addition to the other steps that we took for 2024, which we intend to continue to take for 2025 to the extent applicable.