



## **California Compliance Declaration**

At Becton Dickinson (BD), we hold ourselves to the highest standards of business conduct. We comply with the many laws and regulations that affect our activities worldwide and we act in accordance with BD's Core Values, including "We do what is right." We have established and are operating under a Comprehensive Compliance Program that is reasonably designed to prevent and detect violations.

### **Distinction of Medical Device Manufacturers**

The Advanced Medical Technology Association Code of Ethics on Interactions with Health Care Professionals (the "AdvaMed Code") recognizes that the medical device industry is significantly different than the pharmaceutical industry. Consistent with the United States Department of Health and Human Services Office of Inspector General (HHS-OIG) Guidance, we have tailored our Comprehensive Compliance Program to the nature of our business as a medical device manufacturer.

California law makes reference to compliance with the PhRMA Code on Interactions with Healthcare Professionals. However, we manufacture medical devices rather than pharmaceutical products and have therefore formally adopted the AdvaMed Code, which is substantially similar to the PhRMA Code. We believe that adherence to the AdvaMed Code constitutes compliance with the PhRMA Code for purposes of satisfying the requirements of California law.

### **Description of Comprehensive Compliance Program**

Based on our good faith understanding of the statutory requirements, we believe that we have established a Comprehensive Compliance Program compliant with requirements of California Health and Safety Code §§119400-119402. We have developed this Comprehensive Compliance Program tailored to the size, organizational structure, and resources of the company, and implemented to meet the compliance goals set forth by the State of California.

BD has developed and distributes written compliance standards, procedures, and practices that guide the conduct of its associates. BD has designated a Chief Ethics & Compliance Officer who reports to BD's CEO and to its Board of Directors regularly on compliance issues, and BD has established a management compliance committee to assist in continued implementation of its compliance program.

BD has developed and implemented regular, effective education and training programs for all relevant associates.



BD has created and maintains an effective line of communication with its associates, including the availability of an Ethics Helpline (800-821-5452), for its associates to report complaints or ask questions. The Ethics Helpline is available 24 hours a day, 7 days a week. Calls to the Ethics Helpline cannot be traced and the system affords callers the opportunity to remain anonymous.

BD utilizes audits and other risk evaluation techniques to monitor compliance, identify problem areas and assist in the reduction of any identified problems.

BD has implemented policies and procedures for the investigation of identified instances of non-compliance or misconduct, including directions regarding the prompt and proper response to detected offenses.

### **Changes to Comprehensive Compliance Program**

Compliance is a dynamic concept that must be adapted to the characteristics of each business and to changes to the legal environment. We are likely to continue to review the Comprehensive Compliance Program and make changes to improve it in the coming year.

### **Qualifiers**

Government standards on compliance programs, including the U.S. Sentencing Guidelines and the HHS-OIG Guidance, recognize that no program can completely prevent individual employees from improper conduct.

While we do not represent that every employee will always fully comply and we cannot completely eliminate the possibility that an employee will violate these standards, the purpose of our Comprehensive Compliance Program is to help identify and deter potential violations and discipline employees as necessary.

### **Timeframe Covered**

This declaration is made as of June 1, 2020. We believe that in all material respects, BD is in compliance with its Comprehensive Compliance Program and the requirements of California Health & Safety Code §§ 119400-119402. If you would like to receive a copy of this declaration, please call 800-821-5452.