

embecta  
**Expectations**  
For **Suppliers**



### embecta

is singularly focused on improving the lives of people living with diabetes.



Our corporate culture is guided by our Core Values:

**INTEGRITY, EXTERNAL FOCUS, RESULTS ORIENTED, HUNGRY MINDSET, INNOVATIVE, TEAM PLAYERS, AUTHENTIC AND INCLUSIVE**

embecta associates are expected to follow these values in all aspects of business, including dealings with suppliers.

embecta strongly believes in balancing the “**triple bottom line**” – achieving **strong economic performance**, promoting **environmental stewardship**, and advancing **social responsibility**.

embecta wants to develop relationships with suppliers who follow the Expectations set forth in this document. embecta will work with suppliers to establish action plans to assist them in conforming with any Expectation that is deemed to be in need of improvement.

By communicating these Expectations, embecta is not conferring on any third party’s rights, remedies or obligations.

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# 1. Social Responsibility

## 1.1 CHILD LABOR

All workers must be minimum working age per local laws and regulations, but not less than 14 in all cases. Workers exposed to conditions that are hazardous to health and safety must be at least 18 years old and must use the appropriate personal protective equipment and comply with all local regulatory requirements.

## 1.2 FORCED LABOR

All workers may join and leave a Suppliers' employment of their own free will, provided they comply with any advance notice required by local law. Suppliers shall not use involuntary labor of any kind, including slave labor, indentured/debt labor, forced labor or prison labor for profit-making enterprises. Suppliers shall not require monetary deposits or retain identity papers or work permits as a condition of work.

## 1.3 WORKPLACE

Suppliers shall provide all workers with access to a safe and healthy workplace including, but not limited to: accessible and clean toilets, safe drinking water, sanitary facilities for food storage, and adequate fire exits. Suppliers are expected to have a worker health and safety program addressing physical, chemical and biological hazards in the workplace. Suppliers shall conform to all applicable regulatory requirements for workplace facilities, including working conditions for women.

## 1.4 EQUAL OPPORTUNITIES

Suppliers shall provide equal opportunity to all applicants and workers without regard to race, religion, age, gender, national origin, ancestry, disability, veteran status or any other status protected under applicable law.

## 1.5 ABUSE

Workers shall not be subjected to corporal punishment, mental coercion, physical contact, sexual coercion, verbal abuse or the use of gestures, language or graphic materials that are threatening, abusive or exploitive.

## 1.6 WORK HOURS AND COMPENSATION

Work hours shall be in compliance with applicable laws and standards. Overtime shall be administered and compensated fairly and in accordance with local laws. All wages and fringe benefits must be clearly defined and meet legal and industry minimums. Except to the extent permitted by applicable law, deductions from wages as a disciplinary measure are not permitted.

## 1.7 HEALTH AND SAFETY

Suppliers shall provide a safe and healthy working environment. Suppliers should strive to have in place a formal health and safety program that addresses accident prevention and reporting as well as emergency preparedness and response.

## 1.8 FREEDOM OF ASSOCIATION

Suppliers shall support the freedom of association and the rights of workers and employers to bargain collectively.



## 2. Environmental Stewardship

### 2.1 REGULATORY COMPLIANCE

Suppliers shall comply with all country and local environmental regulations for the regions in which they operate.

### 2.2 EMISSIONS & DISCHARGES

Suppliers will measure and report, in accordance with regional requirements, water and air discharges into the environment. Suppliers should strive to look for ways to reduce these emissions.

### 2.3 CONSERVATION

Suppliers should actively work to reduce the consumption of energy, water and other non-renewable natural resources.

### 2.4 REGULATED SUBSTANCES

Suppliers will have adequate systems in place designed to identify and disclose to embecta all chemicals in their products and product sub-components that are regulated by the governments and/or competent authorities in the regions where they are being used and are deemed hazardous, toxic or carcinogenic.

These regulations include, but are not limited to:

- Waste Electrical and Electronic Equipment (WEEE) – design of electric components to reduce waste and facilitate disassembly for recycling.
- Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) – chemicals, substances and intermediates above certain volumes and/or containing substances of very high concern (SVHC) must be registered if manufactured in the EU and/or placed in the EU market.

- Restriction of Hazardous Substances (RoHS) – hazardous substances contained in electrical products.
- Conflict Minerals – tantalum, tungsten, tin, gold and any derivatives that originated in the Democratic Republic of the Congo (DRC) or an adjoining country.
- Materials of special interest to embecta include but are not limited to carcinogens, BFR (brominated fire retardants), Phthalates, heavy metals and persistent bioaccumulative and toxic materials.

### 2.5 REDUCE/REUSE/RECYCLE

Suppliers will strive to reduce, reuse and recycle material and waste within their manufacturing operations. Recycling processes will employ closed-loop systems wherever possible to achieve maximal use of a material or product. Hazardous waste will be properly handled, stored and disposed of in accordance with local regulations.

### 2.6 TRANSPORTATION LOGISTICS

Suppliers will optimize transportation strategies in order to minimize the environmental footprint of all products shipped. This includes consideration of transportation modes and distances as well as packaging material types and quantities.

### 2.7 LIFE CYCLE ANALYSIS

Suppliers will strive to optimize the environmental performance of their products and operations through a life cycle analysis approach for products, processes and/or services.

### 2.8 CARBON REPORTING

Suppliers are encouraged to voluntarily report the electricity they purchase and the fuels they consume to provide better visibility of their greenhouse gas emissions and a better understanding of their carbon footprint.

## 3. Ethical Practices

### 3.1 FAIR DEALING

embecta endeavors to deal fairly with Suppliers in accordance with ethical business practices. We expect that our Suppliers do the same in dealing with embecta.

### 3.2 CONFLICTS OF INTEREST

embecta associates or members of their immediate family cannot work for embecta suppliers unless such potential conflicts of interest are disclosed and addressed.

### 3.3 ANTI-CORRUPTION

embecta prohibits payment or acceptance of bribes or kickbacks, or any other transaction that creates the impression of impropriety. embecta also expects the same of Suppliers.

### 3.4 SUPPLIER RELATIONS

embecta buys solely upon quality, performance, suitability of the product or service, and cost. embecta does not accept expensive gifts or entertainment from Suppliers.

### 3.5 COMPLIANCE WITH APPLICABLE LAWS

embecta expects Suppliers to comply fully with all applicable laws, including but not limited to: all applicable international trade laws affecting the transfer of goods, services, software and technology across national borders, (including economic sanctions, export controls and anti-boycott regulations), all applicable healthcare laws and all applicable anti-corruption laws. Suppliers must not be ineligible to participate in the U.S. federal health care programs or U.S. federal procurement or non-procurement programs. Suppliers must also not be on the U.S. General Services Administration's List of Parties Excluded from Federal Programs ([epls.arnet.gov](https://epls.arnet.gov)) or the USHHS/OIG List of Excluded Individuals / Entities ([www.hhs.gov/oig](https://www.hhs.gov/oig)).

### 3.6 CONFIDENTIALITY

Suppliers shall safeguard embecta's confidential and proprietary information and ensure that embecta, worker, customer and patient privacy rights are protected.

### 3.7 ANIMAL WELFARE

Suppliers shall strive to ensure that animals are treated humanely. Animal testing should be performed after consideration of the following: replacing animals, reducing the numbers of animals used, or refining procedures to minimize distress. Alternative means of testing should be used whenever scientifically valid and acceptable to regulators.

## 4. Governance

### 4.1 SUB-SUPPLIERS

Suppliers shall have a program to provide that their own suppliers meet Expectations consistent with those set out in this document.

### 4.2 DOCUMENTATION

Suppliers shall maintain documentation necessary to demonstrate conformance with these Expectations and compliance with applicable laws and regulations. This documentation must be made available for embecta's review upon request.

### 4.3 MANAGEMENT SYSTEMS

Suppliers shall have a training program to ensure an appropriate level of knowledge, skills and abilities to meet these Expectations.

### 4.4 ASSESSMENT

Suppliers shall notify embecta immediately if they, or their suppliers, fail to comply with these Expectations. Suppliers shall authorize embecta or an independent third party to conduct site inspections, with or without notice, including audits and/or surveys to confirm adherence to the Expectations set forth in this document. Failure to meet these Expectations may result in a change in the business relationship between embecta and the Supplier. Notwithstanding the above, embecta assumes no duty or obligation to audit or review Supplier's compliance with these Expectations and assumes no liability or responsibility for the actions or omissions of Supplier.

#### RESOURCES

- embecta [Code of Conduct](#)
- embecta [Environment Health, Safety & Sustainability Policy](#)
- embecta [Corporate Governance Principles](#)
- Pharmaceutical Industry Principles for Responsible Supply Chain Management
- Social Accountability International SA8000
- UN Universal Declaration of Human Rights

If you wish to report actions inconsistent with these Expectations,

- use the online reporting tool at: [embecta.ethicspoint.com](https://embecta.ethicspoint.com) or
- email the Ethics Office: [ethics-embecta@bd.com](mailto:ethics-embecta@bd.com)