



# 2024 embecta Modern Slavery Statement

## Introduction

Empowered by 100 years of innovation, our mission at embecta is to develop and provide solutions that make life better for people living with diabetes (PWD). embecta is the leading producer of diabetes injection devices, manufacturing approximately 8 billion devices annually for an estimated 30 million PWD. Through its approximately 2,200 employees around the world, embecta is working to advance the standard of care in insulin delivery through strong community partnerships, innovative technology and comprehensive care resources.

At embecta, our core values start with honesty and integrity, which guide how we operate our business. embecta appreciates that proper governance and management systems allow for responsible business practices that will enable our vision of a life unlimited by diabetes.

To achieve this vision, embecta is committed to operating in a way that respects all human rights of employees and the communities in which we operate our business. This commitment is actively guided by the principles outlined in the United Nations Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Our Modern Slavery Statement includes a summary of how our business is structured and a description of our efforts to apply and monitor our commitment to human rights for our team and the suppliers with which we work. Details can be found in the pages that follow and represent our work across our fiscal year ending on September 30, 2023 (FY2023).



### Organization, Business Structure and Supply Chains

For those of us at embecta, making life better for people with diabetes is deeply personal. The 537 million people worldwide living with diabetes are our friends, our loved ones, our colleagues — and even ourselves. We are proud to serve as a company dedicated to developing and providing solutions that make life better for all of them. As the leading producer of diabetes injection devices, embecta is working to advance the standard of care in insulin delivery through strong community partnerships, innovative technology and comprehensive care resources.

On April 1, 2022, embecta completed a spinoff from BD, previously comprising the diabetes care business within that company. embecta operations comprises three manufacturing facilities (Ireland, US and China), a research and development facility (US) and various commercial offices globally. With approximately 2,200 employees, embecta serves more than 100 countries and works with about 2,500 suppliers globally that provide both goods and services. The company is headquartered in Parsippany, NJ (USA), and is publicly listed on The Nasdaq Global Select Market under the symbol “EMBC.”

Our operations are managed with environmental sustainability and responsible governance principles in mind. We recognize the impact associated with our entire value chain and plan to continue to work with partners and vendors to understand and manage impacts related to the products and services they provide.



## Policies in Relation to Modern Slavery and Human Trafficking

embecta is committed to operating in a way that respects all human rights of employees and the communities in which we operate our business. This commitment is actively guided by the principles outlined in the United Nations Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We are committed to conducting our business in a manner consistent with this principle and in accordance with applicable employment and human rights laws and regulations wherever we have operations. To that end, embecta maintains several policies that reflect our core values which embecta associates are expected to follow in all aspects of business, including dealings with suppliers, customers and other stakeholders. These include:

**Code of Conduct** – includes our position on human rights, outlines requirements to uphold labor and employment laws, prohibits forced labor, child labor, etc. and specifically extends these expectations to our suppliers. Included within the Code of Conduct is embecta's approach to speaking up, with details of our Ethics Helpline and online reporting tool, Ethics Office, etc. embecta associates are encouraged and expected to speak up about any actual or suspected violations of laws, regulations, the embecta Code of Conduct, embecta policies, or relevant industry codes. Those that speak up in good faith are protected against any form of retaliation or discipline.

**Global Human Rights Policy** – which outlines our commitment to protect human rights, preserve the integrity of our workforce, and to integrate human rights principles into our business processes and practices.

**Expectations for Suppliers Code** – which details our policy requirements for any suppliers working with embecta and prohibits the use of involuntary labor of any kind, including slave labor, indentured/ debt labor, forced labor, or prison labor by embecta suppliers.



## Due Diligence Processes

### Patient assistance programs

Within our own manufacturing and R&D facilities in the US, China and Ireland, we have a strong workplace safety program that is part of our broader environmental, health and safety management system and includes consistent policies, training and tracking, along with a significant focus on hazard reduction and safety culture development to minimize workplace injuries. Our **Environmental, Health, Safety and Sustainability Policy** provides a foundation for this training and calls for strong leadership at every site to ensure employee safety is a focus of daily operations.

### Supplier expectations

We work with a variety of suppliers globally and want to partner with those that share our commitment to responsible and sustainable operations. In part, we rely upon our TSAs with BD to manage our supplier relationships, but as we set up our teams and separate our systems we are taking on this responsibility directly. Our Expectations for Suppliers Code details our policy requirements for any suppliers working with embecta. We expect suppliers to notify embecta immediately if they, or their suppliers, fail to comply with these expectations. In addition, suppliers are subject to site inspections, including audits and/or surveys to confirm adherence to the expectations outlined in the Code. Failure to meet those expectations may result in a change in the business relationship between embecta and the supplier.

## Reporting concerns

We maintain a reporting/grievance mechanism through our Ethics Helpline, a third-party-led monitoring and oversight mechanism that is available both internally for embecta employees and externally for all stakeholders. This system allows for anonymous (where permitted by law) and/or confidential reporting of all matter of ethics concerns, including known or suspected human rights abuses both within embecta and in our wider supply chain. We encourage and expect all employees to speak up and report actual or suspected violations of laws, the Code of Conduct, embecta policies or relevant industry codes. It is available online or via telephone in a number of languages.



## Assessing and Managing Risk

The human rights commitments in our Code of Conduct are integrated across our operations through a number of oversight systems and processes. Our embecta Manufacturing & Supply Chain (including Operations, Supply Chain, Procurement and Sustainability/EHS) and Human Resources functions ensure compliance with our policies prohibiting forced labor, human trafficking and modern slavery across all of our operations. At the manufacturing and distribution level, our Global Manufacturing and Supply Chain teams ensure continued compliance through several layers of risk management, such as regular internal audits that include desk-based and on-the-ground risk and EHS audits.

Additionally, embecta employees are trained to report concerns around Code of Conduct violations to the EthicsHelpline. embecta suppliers are also encouraged to report concerns through the same process. Such reports may trigger additional risk assessments until identified risks are adequately managed by appropriate follow-up actions where necessary.

Within our supply chain, some suppliers may be asked to complete an in-depth, third-party-led desktop audit, the results of which may trigger site inspections and/or in-person audits or guide our remediation efforts if deemed necessary. embecta maintains the right to conduct site inspections and audits of suppliers by itself or through a third party.



### Measurement and Effectiveness of Steps Taken

We are proud to serve as a company dedicated to developing and providing solutions that make life better for PWD. Throughout 2023, we made meaningful progress to separate and stand up as an independent company, including establishing policies and systems that underscore our commitment to delivering our products and solutions responsibly and with a view toward how our business impacts the broader communities in which we operate. Our Environmental, Social and Governance (ESG) strategy is centered on this commitment and continued to evolve alongside our business in 2023.

The four pillars of our ESG strategy are detailed below and one of the four core focus areas is responsible operations, which includes our commitment to human rights. As reported in our 2024 ESG Report, we will continue to update stakeholders on our progress to measure and track the governance associated with our business, including operating in a way that respects all human rights of employees and the communities in which we operate our business.

#### Improving the lives of people living with diabetes

- Product quality and safety
- Access and improved care
- Patient advocacy

#### Supporting our team

- Occupational health, safety and wellness
- Diversity, equity and inclusion
- Talent, recruitment and retention

#### Better for our planet

- Design and life cycle management
- Climate and energy

#### Responsible operations

- Governance
- Regulatory compliance
- Data security and privacy
- Supply chain



embecta also participates in industry working groups where we learn best practices that have been implemented by companies across sectors and we seek to apply those where they add value to our programs.

## Training on Modern Slavery and Human Trafficking and Capacity Building

embecta takes steps to educate employees and third parties so they can identify modern slavery and other human rights abuses and take steps to eliminate them, both in our own operations and within our supply chain. These steps include:

- For our own operations, embecta maintains a robust EHS and ethics, compliance and labor standards programs that foster a culture of compliance. These programs include relevant training and guidance as appropriate. Additionally, all embecta associates are trained annually on our Code of Conduct and all other embecta policies. We maintain SA8000 certification at two of our three manufacturing facilities, with plans to complete the third.
- embecta uses an online training program called “Slavery and Human Trafficking in Supply Chains,” which is administered online annually. This course explains that forced labor, also known as modern slavery, still exists in the world and prompts the learner to consider ways of identifying and preventing it in the supply chain. It also trains employees to report known or suspected human rights abuses via our Ethics Helpline. This course is delivered to employees that interact directly and indirectly in sourcing or that manage, advise or are otherwise involved with our suppliers, including our leaders and our employees in the following departments: Environment, Health and Safety, Procurement, Supply Chain, Quality, R&D, Operations, Human Resources, and our Legal Group.

embecta strives to continuously improve its programs to ensure compliance with applicable laws and embecta's high ethical standards and to meet the expectations of our customers, shareholders, associates, communities and other stakeholders.

This statement was approved and adopted by the embecta Board of Directors on February 07, 2024.



Devdatt (Dev) Kurdikar  
President and Chief Executive Officer