



ESG strategy report

Advancing every day together

2024





About embecta™

Empowered by 100 years of innovation, embecta — a global diabetes care company — is focused on improving the lives of 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.

~8 billion
injection devices








~30 million
people with diabetes

2+ thousand
employees

Our **mission** is to develop and provide solutions that make life better for people living with diabetes.

Our **vision** is a life unlimited by diabetes.

Our values

-  Integrity
-  External focus
-  Results oriented
-  Hungry mindset
-  Innovative
-  Team players
-  Authentic & inclusive



Key products

Pen needles

embecta offers pen needles, which are sterile, single-use and designed to be used in conjunction with pen injectors used for insulin and other diabetes medications. embecta also offers safety pen needles, which have shields on both ends of the cannula that automatically deploy after the injection to help prevent needlestick exposures and injuries during injection and disposal.

Insulin syringes

embecta offers a portfolio of sterile, single-use insulin syringes in varying needle lengths and barrel sizes for people with diabetes who draw from an insulin vial, as well as safety insulin syringes to help prevent needlestick exposures and injuries during injection and disposal.

BD™ Diabetes Care App

This digital app includes personalized settings and information designed to help people manage their diabetes. The app provides educational content, personalized health management tools, diabetes-friendly recipes and more, serving as a channel for our support, education of and engagement with the prediabetes and diabetes community.



A Letter from our President & Chief Executive Officer: Dev Kurdikar

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.

The work we completed in service of this mission in 2023 was a highlight of our first full fiscal year as a stand-alone company, having spun-off from Becton, Dickinson and Company (BD) in April 2022. Throughout the year, 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.

After completing our materiality assessment in late 2022, our ESG team presented to our Management and Board of Directors the strategic focus areas around which we will monitor and report. We are pleased to share this second annual ESG report which provides a high-level summary of our work over the past year in these areas.

While we are a new company, embecta is building upon a century of insight and innovation around supporting people with diabetes. In 2024, we will celebrate 100 years since our predecessor company introduced the first dedicated insulin syringe — a long-term commitment to the diabetes community that is virtually unmatched in the medical technology industry. Thanks to the hard work and commitment of our team across the world, we stand ready to continue to make history by growing our business sustainably, and in doing so, fulfill our vision of a life unlimited by diabetes

Thank you,



Devdatt (Dev) Kurdikar
President and Chief Executive Officer



embecta's long-term business strategy

Strengthen and optimize core business

- Maintain core injection business revenue
- Navigate through operating environment; manage costs

Separate and stand-up

- Complete enterprise resource planning (ERP) implementation
- Operationalize embecta systems and resources, and exit transition service agreements with BD

Invest in growth

- Continued progress on insulin patch pump development
- Seek M&A and partnership opportunities

2023 year-end performance

Twelve months fiscal year 2023 results (ended 9/30/23)

Dollars in millions	Twelve months ended		% Increase/(decrease)		
	09/30/2023	09/30/2022	As-reported revenue growth	Foreign currency impact	Constant currency revenue growth
United States	\$601.4	\$600.3	0.2%	—	0.2%
International	\$519.4	\$529.2	(1.9%)	(5.1%)	3.2%
Total	\$1,120.8	\$1,129.5	(0.8%)	(2.4%)	1.6%

\$1.12
billion
(FY'23)



ESG strategy & reporting

ESG strategy & reporting approach

embecta is planning a multi-year strategy to advance ESG initiatives that began in 2022 with an evaluation of embecta’s ESG risks and impacts at the time of its spin-off from BD. This evaluation phase commenced with a sustainability materiality assessment (completed in 2022) and an internal review of the United Nations Sustainable Development Goals (UNSDGs) and their relevance to embecta. Our approach to this process is detailed below.

Sustainability materiality assessment

A materiality assessment enables prioritization among ESG issues, and is customized depending on an organization’s strategy and commitment to report externally. embecta partnered with the Business for Social Responsibility (BSR), a leader in this area, to provide industry insights and best practices to assist us in developing our strategy. Through a series of external and internal interviews and surveys, conducted on embecta’s behalf with the stakeholder groups, embecta established four strategic areas that will be the focus of our ESG strategy and reporting. These four areas represent strategies that are critical to embecta’s future success and ESG matters that are valued and monitored by the stakeholders we serve. They are listed in the following pages.

UN Sustainable Development Goals

embecta is also reviewing and aligning its efforts, as appropriate, against the United Nations 17 Sustainable Development Goals, which are based on the 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015 (UN Agenda). The UN Agenda is intended to provide a shared blueprint for peace and prosperity for people and the planet, now and into the future.



embecta supports the Sustainable Development Goals

~8 billion
units produced
annually

ESG strategic focus areas



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





Defining our ESG Focus in 2023

A foreword from Declan Cunningham, Director of Sustainability, embecta

At embecta, we are driven by our mission and purpose to develop and provide solutions that make life better for people living with diabetes. As we navigate our inaugural year as an independent company, this mission guides and informs the ESG aspects of our strategy. Following the completion of our materiality analysis, we have identified four core ESG focus areas, framing the foundation of our endeavors.

In recognizing the impact businesses can have on society and the environment, our ongoing development of the ESG strategy serves as a cornerstone and a commitment to operate responsibly. This commitment resonates through our dedicated team of approximately 2,200 employees, each driven by a genuine passion for supporting the diabetes community.

Our collective efforts, detailed in the following pages, reflect not just a corporate initiative but a shared responsibility. As we look forward to 2025, the importance of our ESG strategy amplifies. Beyond being a measure of our progress, it signifies our dedication to contributing to a healthier, more sustainable future for all.



~30 million
people with
diabetes reached





ESG management

The management of the ESG strategy at embecta is shared across the organization through a cross-functional working team; senior leadership team (CEO and direct reports) engagement; and Board of Directors oversight.

Board oversight

The Corporate Governance and Nominating Committee is a subset of the Board of Directors, and takes the lead on oversight of the strategy and annual reporting, with input from all relevant committees throughout the year. The full Board receives updates on the strategy and its progress.

Management oversight

The Enterprise Risk Committee comprises several members of embecta's senior leadership team and directs the ESG strategy, alongside the enterprise risk management process, and provides reports to the Board. The senior leadership team receives regular updates regarding the strategy and its progress.

ESG working group

The ESG Working Group comprises leaders from across the organization tasked with shaping and driving the ESG strategy throughout the year. Senior representatives from the working group are also a part of the Enterprise Risk Committee.



Board of Directors governance policy

It is embecta's policy that the Board be composed predominantly of independent directors, thereby ensuring their availability to serve on the Audit, Compensation and Management Development and Corporate Governance and Nominating Committees. No more than two members of embecta's management, or persons who held embecta management responsibilities within the preceding three years, may be members of the Board at any given time. The size of the Board, its operational principles, compensation practices and ethical codes, among other Board topics, are covered in our **Corporate Governance Principles**.¹

¹ For more information on embecta's Corporate Governance Principles, please visit: <https://investors.embecta.com/static-files/17293281-c769-403d-8bc3-86cad6903c35>

>100
countries served



Improving the lives of people living with diabetes

Just over half a billion people are living with diabetes worldwide and the prevalence is expected to continue increasing. To achieve our vision of a life unlimited by diabetes, we work closely with the global diabetes community, payors and regional health authorities to ensure our products and solutions are developed and delivered adhering to our high quality standards and improve the care of and are accessible to people with diabetes around the world.

A commitment to product quality & safety

To ensure the safety, efficacy and quality of our products from design and development to manufacturing, distribution and post-market surveillance, we maintain a robust quality management system (QMS) and **policy** that encompass various processes and procedures to ensure the safety, effectiveness and reliability of our products. This begins with a risk management process to identify, assess and mitigate risks associated with our devices and to identify proactive measures to reduce potential hazards and ensure patient safety.

The efforts around quality are led by our Vice President of Global Quality, who reports to our Chief Technology Officer. The company seeks to create a quality mindset that permeates every level of our organization, so we have invested in training and education for all employees that takes place throughout the year to reinforce this philosophy.

Regulatory compliance & document control

embecta adheres to global quality and safety guidelines and regulations that include the following:

ISO 13485	Quality Management Systems for medical devices
ISO 14971	Application of risk management to medical devices
ISO 11607-1 ISO 11607-2	Packaging for terminally sterilized medical devices
ISO 10993	Biological evaluation of medical devices
ISO 8537	Sterile single-use syringes, with or without needle, for insulin
ISO 11608	Needle-based injection systems for medical use
ISO 11137	Sterilization of health care products

embecta has a structured document control system to manage procedures, work instructions, specifications and other critical documents for the quality management system. Our document control processes ensure that employees have access to up-to-date information and can track changes and revisions to processes and products.





Clinical trial conduct & post marketing surveillance

Clinical trials are conducted in accordance with the relevant harmonized standards and applicable international and national legal requirements (e.g., ISO 14155). Clinical data of clinical investigations are collected and documented with regulatory authorities.

Once those products reach the market, embecta monitors patient safety data through frequent post-market surveillance reporting, and diligently collects and analyzes information on device performance, adverse events and customer feedback to identify promptly any potential safety concerns. This proactive approach allows us to take swift and appropriate action to ensure the continued safety and well-being of patients who rely on our products. Reportable product issues are disclosed to the appropriate regulatory bodies to ensure public health and safety.

Audits, inspections & corrective actions

embecta diligently monitors recalls and regulatory findings in collaboration with the relevant regulatory bodies to ensure compliance and prioritizes the safety and satisfaction of our customers. embecta reviews and monitors key performance indicators through careful data collection, analysis and evaluation to identify areas of improvement and deliver the highest level of quality for our customers.

embecta has regular internal and external audits conducted to assess the effectiveness of our QMS and ensure compliance with regulations and follows a systematic approach to address non-conformities, customer complaints and other quality issues related to our products. Our Corrective and Preventive Actions (CAPA) processes involve root cause analysis, corrective actions and preventive measures to continuously improve product quality for our customers.

The company monitors product recalls, fatalities related to our products as reported to the regulatory bodies and any correspondence related, but not limited to, the activities above.





Training & competency

embecta empowers our employees to maintain our standards of compliance by equipping them with the necessary knowledge and skills to meet regulatory requirements and uphold industry practices. We provide our employees with regular assessments, training modules and ongoing professional development to foster a culture of accountability.

embecta holds an annual Quality Week hosted by our primary manufacturing facility in the European Union that showcases our performance against key quality goals and initiatives and emphasizes our commitment to maintaining a culture of quality and continuous improvement.





Patient assistance programs

embecta has a number of programs in place to help people with diabetes who are in need obtain affordable access to our products. Depending on the region, rebates and patient assistance programs may be available based on certain conditions.

Donating products & grants to those in need

We work with non-profit partners such as Direct Relief to help provide access to our product in times of crisis. For example, we donated 500,000 units of syringes and 4M units of pen needles to support earthquake relief efforts in Turkey, and more recently, provided pen needles, insulin syringes and alcohol swabs to aid the people in Maui following the wildfires in July.

Making connections to improve access to diabetes care






To foster connection with and offer support to people with diabetes, we launched our diabetes care app in 2018, which has been downloaded more than 600,000 times. The app provides educational content, personalized health management tools, diabetes-friendly recipes and more, serving as a channel for our support, education of and engagement with the prediabetes and diabetes community.





Community support & volunteerism



As a company focused on improving the lives of people living with diabetes, we share a sense of urgency to advance diabetes care together with those who are similarly focused on this goal. embecta has a long history of supporting the diabetes community and continues its social investing in areas such as grants and volunteerism, as well as product donations. Detailed below are some of these efforts.

 BEYOND TYPE 1	<p>Beyond Type 1 is a global movement working to help those with diabetes not only survive — but thrive. By driving awareness, innovation, funding, and health equity, Beyond Type 1 is helping the world drive toward a cure.</p>	<p>embecta supports their Diabetes Scholars program – providing funding for scholarships to high school students with type 1 diabetes.</p>
	<p>A nonprofit whose mission is to improve the health and wellness of individuals living with or at-risk of diabetes through equitable, accessible, compassionate, high quality care.</p>	<p>embecta supports their efforts to offer free education and support programs to ensure that individuals with prediabetes, type 1, type 2 or gestational diabetes have the knowledge and tools necessary to reduce the risk of developing diabetes or to delay or avoid the long-term complications.</p>
 Children with Diabetes®	<p>A nonprofit that serves as a global resource for support, education and inspiration to empower families and all people living with diabetes to enjoy healthy, enriched lives.</p>	<p>embecta is a member of the advisory board of Children with Diabetes, and supports a needs-based scholarship to a family for the Friends for Life conference.</p>
	<p>Camp Neveda is a full-season residential camp that exclusively serves campers with type 1 diabetes and their families.</p>	<p>embecta provides scholarships and financial assistance to campers, donated 100 backpacks to camp counselors, and organized volunteers to help with camp intake days.</p>
	<p>JDRF is the leading global organization harnessing the power of research, advocacy and community engagement to advance life-changing breakthroughs for the nearly 8.7 million people around the world who live with type 1 diabetes.</p>	<p>Many embecta employees across our sites walked in JDRF's One Walk in 2023, which brings together thousands of people across the country to change the future for everyone living with type 1 diabetes.</p> <p>embecta participates in the JDRF Industry Advisory Panel and provides educational resources through JDRF's support programs.</p>

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#1 producer
of diabetes
injection devices



	<p>A nonprofit dedicated to preventing and curing diabetes and to improving the lives of all people affected by diabetes.</p>	<p>embecta served as a corporate sponsor of the New England Tour de Cure in 2022 and 2023 and was a "Camp Carefree Supporter" in 2022, in support of ADA's mission. At a local level, employees held fundraisers and participated in local ADA Tour de Cure events.</p>
	<p>World Diabetes Day and National Diabetes Awareness Month</p>	<p>To raise awareness and improve education around diabetes, embecta has started an annual tradition of ringing the NASDAQ opening bell to recognize National Diabetes Awareness Month in November and World Diabetes Day (November 14), inviting advocacy groups, people with diabetes, caregivers and healthcare professionals in celebration of their work to raise awareness, improve access, provide education and drive research forward.</p>

We look forward to continuing to work alongside these and other groups to address the needs of people with diabetes and bring education and awareness about how to best prevent and manage this chronic condition.

Employee matching gifts

To support employee engagement and enhance the company's charitable giving efforts, embecta recently launched an employee matching gift program. For employee donations to the American Diabetes Association, JDRF, Life for a Child, Direct Relief or the Diabetes Education & Camping Association, embecta matches that donation up to \$5,000 per employee per year.

embecta team members from Spain volunteering at Campamento de Verano, a local diabetes camp





Better for our planet

Our operations at embecta are managed with environmental sustainability principles in mind. We are in the process of setting clear and positive environmental goals for our operations and products, and anticipate reporting those in the near future. 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 products and services they provide to us.

Managing our operations efficiently

Unlocking environmental change hinges on the strategic and efficient management of our operations. Our unwavering adherence to robust policies and standards underscores our commitment to reducing waste, harnessing renewable energy sources where possible, and overseeing energy and water consumption. These practices reflect our enduring principles and propel us toward an even more sustainable future.

We are proud that all of the embecta manufacturing sites carry ISO 14001 certification — a globally accepted standard that signals embecta has sought to manage our environmental responsibilities in a systematic manner that contributes to the environmental pillar of sustainability.

Across our manufacturing sites, we actively monitor and strive to reduce impacts associated with the following:

- Waste volumes – hazardous and non-hazardous
- Electricity consumption
- Gas consumption & diesel fuel usage
- Water consumption
- Solvent consumption and volatile organic compounds (VOC) emissions

Product design & life cycle management

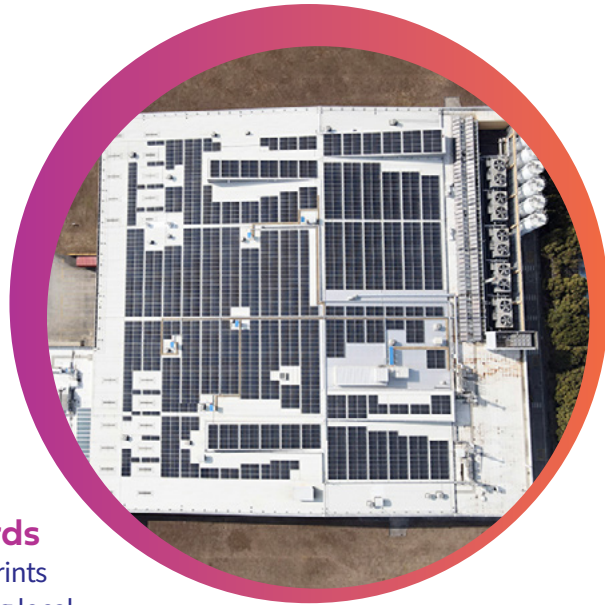
Our intention is to design our products in a sustainable manner while still meeting the criteria for effective usage and the required quality standards to which we adhere. We seek to responsibly source materials and keep excessive packaging and disposability in mind with the goal of reducing waste. We also look for opportunities to reduce material intensity, particularly around plastics. As we develop new products and innovations, sustainable engineering practices and product design considerations have been embedded into our process.





New solar plant project in Suzhou, China

In an effort to conserve energy more sustainably for the long term, embecta has elected to renovate its Suzhou, China site roof with photovoltaic power generation capacity. The project went live in July 2023 and is expected to generate 970,000 kW•h of electricity, or 15% of the site's energy use annually, which can be converted into 298 tons of standard coal — potentially reducing carbon dioxide emissions by about 771 tons, sulfur dioxide emissions by about 182 kg and dust emissions by about 37 kg every year.



Compliance with environmental standards

As governments work to manage the environmental footprints of their respective territories, embecta is closely monitoring local, national and global standards to ensure compliance with all relevant regulation such as these examples listed below:

Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 - Conflict Minerals

REACH (Regulation (EC) No 1907/2006), a European Regulation concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals

EU Packaging and Packaging Waste Directive 94/62/EC

California Safe Drinking Water and Toxic Enforcement Act of 1986, also known as California Proposition 65

Regulatory compliance to Integrated Pollution Control License, granted under Environmental Protection Agency Act 1992 as amended





Raw material use

As we work to infuse sustainability measures into our manufacturing processes and product design efforts, we have begun to monitor and measure the weight and/or volume of raw materials used to produce our products. The company has several initiatives underway to reduce material usage that are detailed below:

- Through incremental improvements, we have reduced assembly line waste that has resulted in reductions in resins, moldings, adhesives, cannulas and packaging materials.
- Through a combination of engineering projects and ongoing continuous improvements, we have also made significant reductions in our quality waste (non-conforming product). We are reducing quality waste by defining pre-screening processes on materials and complex components, building test programs for sub-assemblies and re-using equipment/fixtures in the production line.

Recycling & reuse

embecta employs a global recycling program to address waste generated across our sites. We take a multi-faceted approach by focusing on source reduction, waste minimization and use waste disposal alternatives such as beneficial use and recycling improvements. Typically this is done at both the site and regional level by establishing targets to reduce the generation of waste.

Product design & sustainable engineering

In addition to reducing waste in our manufacturing process, we are also working to develop products and packaging that are more sustainable by incorporating principles and practices that minimize environmental impact, promote resource efficiency and support long-term ecological and social well-being.





Supporting our team

Our talented employees are an integral reason for our standing as one of the world's leading diabetes care companies. Our success is dependent on our ability to attract, engage and retain the best talent that reflects our diverse communities. Therefore, supporting the health and well-being of our team, maintaining a safe and healthy workplace and driving a culture that embraces learning and inclusion is at the center of our business.

Occupational health & safety

With 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. To drive consistency, we have implemented the Safe Start® training program, which is focused on reducing injuries through increased engagement and culture improvements, across our sites. As part of this program, our leaders perform daily safety walkdown meetings; flag and track safety observations; and share safety stories across the teams and sites so employees can learn from each other and continually improve our workplace safety results.

The sites have a robust incident reporting and investigation system where corrective and preventive actions are identified and tracked to closure. Safety alerts are issued to sites to share learnings and engage all employees in our continuous improvement efforts.





Employee wellness

embecta supports the physical, emotional, financial and social well-being of our employees — and empowers their lives — through a number of programs detailed below.

Physical	Emotional	Financial	Social
Medical plan options	Employee assistance program	401K plan	An inclusive and engaging culture
Health savings accounts	Paid time off	LifeFlex accounts	Employee resource groups, Wellbeing, Culture, Women in STEM
Tobacco- and smoke-free work environments	Paid parental leave	Money-saving accounts	(science, technology, engineering and mathematics), LGBTQ+, Biodiversity
Maternity support	Flexible work arrangements	Additional insurance plans for accidents, disability, auto and home	Annual Partnership with a charity employees choose
Well-being incentive program		Group legal plan	Opportunities to give back to their communities through volunteerism and giving*
Diabetes and chronic condition management		College savings plans	
Supplemental critical care insurance		Financial counseling and education	
Dental and vision plans		Adoption assistance/fertility support	

*Please see our DE&I and Access sections for details.

~2,200
employees globally





Attracting, recruiting & retaining top talent

The passion and commitment to our mission demonstrated by our employees makes it possible for embecta to advance hope in the communities we serve around the world. To recruit and retain our talent, we work across our locations to ensure employees are compensated fairly and at a competitive level; can access training and development; and work in a safe and inclusive environment. We conduct employee surveys to collect feedback which helps us to understand employee preferences for consideration in program development.

Equitable pay practices

embecta provides competitive base pay, plus opportunities for eligible employees to earn an annual incentive bonus based on achievement of key short-term objectives through individual contributions to embecta's overall company financial results.

We are committed to ensuring that our employees are compensated fairly and equitably for their contributions to the company. Our pay decisions are made without regard to race, ethnicity, gender, age, sexual orientation, gender expression, disability, protected veteran status or any other status protected by law. We assess compensation through regular audits and make adjustments when necessary to ensure that pay is equitable. We believe our focused approach to gender diversity, in terms of pay, benefits, gender-focused recruitment processes and development opportunities helped us to achieve our goals.

Training & development

Since our very first day as an independent company, we wanted to provide a way to “feed the hungry mindset” of our employees, one of our core values. As we work to develop a long-term learning and leadership development strategy, we are happy to offer training courses through our LinkedIn Learning program, which is an online learning platform that offers more than 18,000 courses that employees and managers can customize to each individual employee's needs.

We have also launched a management training program to grow and develop our people managers, who we believe are the lifeblood of our company, as they play such a critical role in helping to maintain employee engagement and overall job satisfaction. The RISE manager effectiveness program is offered to all middle managers across embecta. This is a customized program that seeks to build capabilities and provide tools for effective management.





Building a culture of diversity, equity & inclusion

Our commitment to diversity, equity and inclusion (DE&I) is embedded in our values and is a priority across the business. We believe our workforce should reflect the communities in which we operate and the customers and PWD we serve. We also know that diversity within our teams will drive opportunity identification and problem solving in support of our mission. The goal is to create an environment where everyone can bring their best authentic self to work and where a broad range of thoughts and experiences are recognized and encouraged. This starts at the top of our organization with our leadership teams and is being driven throughout the company.

We are proud to report that our **Board is 67% ethnically and/or gender diverse** and our **senior leadership team is 44% ethnically and/or gender diverse.**

Developing inclusive leaders

embecta operates in more than 100 countries and our people managers are exposed to diversity training in the manager effectiveness program, which was started in 2023 to support our efforts to build an inclusive environment. We also piloted a cross-culture agility course in 2023 and have additional course work planned for the future.

Our senior leaders are highly engaged in leading by example when it comes to promoting diversity across our teams. In support of International Women's Day, our CEO and other top leaders hosted a panel discussion focused on "Equity versus Equality," engaging our teams on this important topic.

International Women's Day

In honor of International Women's Day, on March 6th, our employees participated in a female-focused volunteer opportunity with Oasis, a nonprofit organization located in Paterson, NJ. The mission of Oasis is to change the lives of women and children by breaking the cycle of poverty through compassionate programs designed to feed, clothe, educate and empower women and children in need. Employees assisted in sorting clothing, preparing food in their soup kitchen and serving lunch meals to those in need in the community.





Responsible operations

At embecta, our core values start with honesty and integrity, which guide how we operate our business. embecta may be a new company, but as a spin-off from BD, we have a strong foundation and an appreciation that proper governance and management systems allow for responsible business practices across the organization. Details on some of our core governing policies are below.

Code of Conduct

embecta's **Code of Conduct** sets the foundation for operations across the business, consistent with the company's core values. To the extent that the Code of Conduct requires a higher standard than required by applicable laws, rules or regulations, embecta adheres to these higher standards. Everyone at embecta, from directors to officers and employees, must follow the Code of Conduct. It applies equally to everyone, no matter their position or level. This is a condition of employment and every employee goes through an annual training.

Reporting concerns

embecta is committed to an environment where open, honest communications are the expectation, not the exception, and is committed to taking all reports of violations of laws, embecta policies and our high ethical standards seriously. We promptly, fairly and thoroughly investigate all reports and 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. There are several mechanisms in place to report such concerns including accessing our anonymous Ethics Helpline; contacting our Ethics Office directly through email or phone; reporting concerns through the online portal; or speaking to a supervisor, member of management or Human Resources.

Anti-corruption / anti-bribery

An important part of achieving our objectives is interacting and collaborating with government officials, healthcare professionals (HCPs) and healthcare organizations. Collaboration with these parties in both the public and private sector must be ethical, compliant and must not have (or appear to have) an improper influence on government official decisions, medical judgment, purchasing decisions or product recommendations. Therefore, embecta trains all employees to conduct their activities in full compliance with all applicable anti-bribery and anti-corruption laws, including local laws and industry codes in the countries where embecta operates, as well as laws with cross-border implications, and require our external business partners to adhere to these same ethical standards.

~800k
square feet

of manufacturing space
across the United States,
Ireland and China



Our work with healthcare professionals

embecta interacts with HCPs for various business reasons, such as enhancing the safe and effective use of embecta medical technologies, conducting research and educational programs and the development of new products. We train our employees and business partners to follow global standards to help ensure that our interactions with HCPs are conducted ethically to meet a legitimate business need and not for any actual or perceived improper, unethical or illegal purpose. All product communications with HCPs must be truthful, not misleading, on-label and approved. With the exception of certain limited communications from Medical Affairs and Health Economics Outcomes Research (HEOR), all communications made about embecta products must be consistent with the approved or cleared labeling for the products. Promotion of any embecta product for an off-label purpose is strictly prohibited.

Working with regulators

embecta's products are approved, registered and distributed in more than 100 countries worldwide and as a result, the company maintains healthy and strong relationships with medical device regulators across the world. Starting in 2022 and continuing through 2023, embecta made progress on the European Union's Medical Device Regulation (MDR) requirements, submitting all product files to MDR Notified Bodies. The company's first MDR certificate was issued in December 2022. In addition, embecta's quality management system has been certified to support more than 100 countries and includes the fulfillment of the following regulations:

- U.S. Food and Drug Administration 21 CFR 820
- International Organization for Standardization (ISO) 13485
- European Union MDR
- International Medical Device Regulators Forum Medical Single Audit Program (MDSAP)





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 transitional service agreements 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.

Human rights

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 meet our responsibilities with respect to human rights, embecta makes the following commitments in all our operations:

We do not use child labor.

We do not use forced, prison, indentured, bonded or involuntary labor.

We prohibit discrimination in our hiring and employment practices.

We prohibit threat of or actual physical abuse and harassment of employees.

We provide a safe and healthy workplace for our employees.

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

We are committed to applying this policy across all of our operations and expect our business partners to do the same. More details can be found in our Global Human Rights Policy, the principle of which are also captured in our **Modern Slavery Statement**, to address the UK Modern Slavery Act of 2015 and the Criminal Law (Human Trafficking) Act 2008, and the Criminal Law (Human Trafficking) (Amendment) Act 2013 for the Republic of Ireland.



Protecting our data

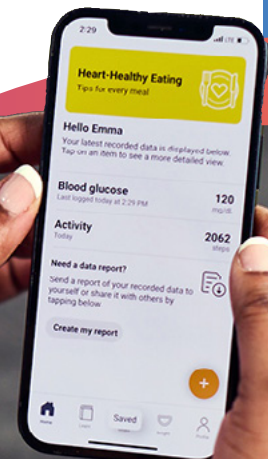
embecta is committed to keeping data secure and has a comprehensive data security and privacy plan centered around confidentiality, integrity and availability. Security risks to the company and its customers are constantly evaluated and monitored. All embecta employees and contractors are trained to maintain data security appropriately and we actively monitor security 24 hours a day and seven days a week through our global Security Operations Center. We have implemented a multi-layered defense-in-depth approach using industry-leading technologies. Additionally, we expect our vendors to adhere to our data privacy and security standards and we evaluate their ability to comply as part of our vendor assessment process.

embecta's cyber program is part of embecta's comprehensive Enterprise Risk Management program. Risks are regularly monitored and reported to key leaders throughout the company to ensure appropriate attention is given to top risks for embecta, its customers and its partners. In addition to the security defenses, we have a robust governance approach built upon the ISO 27001 framework, which incorporates the National Institute of Standards and Technology (NIST) and Center for Internet Security (CIS) frameworks to build a comprehensive approach to cyber security.

Protecting the privacy of our employees, customers & stakeholders

In delivering our mission to develop and provide solutions that make life better for people living with diabetes, we process information about individuals we interact with. embecta takes the trust these individuals place in us and their data privacy seriously. We believe that carrying out our business activities in compliance with applicable privacy and data protection laws is fundamental to our business success. This commitment to supporting and prioritizing privacy is exemplified in our focus on data minimization, our privacy-by-design approach and our commitment to transparency.

While building a privacy program with respect for individual's data in mind, we ensure compliance with all legal obligations and standards and take time to respond to and comply with requests and legal demands from regulators or other authorities. Additionally, we align our practices to meet the requirements of transparency laws governing interactions with HCPs. Please see a copy of our **Privacy Policy Statement** for more details.





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