

TITLE: BUSINESS ETHICS POLICY

I. PURPOSE AND SCOPE

To establish a policy containing standards for appropriate business conduct for employees and directors of C. R. Bard, Inc. and its subsidiaries worldwide (“Bard” or the “Company”).

II. DEFINITIONS

Not applicable.

III. RESPONSIBILITIES

Chief Executive Officer is responsible for working in conjunction with the Chief Compliance Officer for overseeing compliance with this Policy and the Standards of Conduct. In addition, the Chief Executive Officer is responsible for establishing the Policy, and the Standards of Conduct and Business Ethics set forth below.

Chief Compliance Officer is responsible for implementing this Policy, monitoring compliance, investigating reports of suspected violations of law or this Policy, as well as for reviewing this Policy on an annual basis.

Compliance Coordinator is any person who may be designated from time-to-time by the Chief Compliance Officer to conduct compliance-related activities.

Managers are responsible for reviewing this Policy with their direct reporting employees to ensure that those employees understand and will abide by this Policy.

Employees are responsible for understanding and complying with this Policy and the Standards of Conduct contained within it, and reporting suspected violations. Employees are encouraged to report any concerns about compliance with this Policy and the Standards of Conduct. Each employee will annually certify that they have reviewed, understand and will abide by this Policy.

IV. POLICY

Bard has a long history of serving the clinical needs of our customers and the patients who use our products. Bard’s Mission reflects our shared commitment to them and to our shareholders, employees and community:

To advance the delivery of healthcare by profitably developing, manufacturing and marketing value-driven products which meet the quality, integrity, service, and innovation expectations of our customers while providing opportunities for our employees. As a



result, we will optimize shareholder value and be a respected worldwide healthcare company.

This Business Ethics Policy sets forth the Bard Standards of Conduct and Business Ethics. In all aspects of our business, we are guided by our four Core Values:

Quality, Integrity, Service, Innovation.

Every employee, officer and director of the Company and its subsidiaries worldwide must comply with this Policy. We have established procedures to encourage employees to report suspected violations of law or this Policy. Bard will not tolerate retaliation against any employee who reports such a violation in good faith. We also expect that individuals who are acting on our behalf will abide by all applicable laws and this Policy.

It is not possible to address in this Policy every possible situation that may arise in the conduct of our business. If you have any doubts or concerns or encounter a situation not covered in this Policy, ask your supervisor, your local Human Resources representative, the Law Department or the Chief Compliance Officer, any Compliance Coordinator, or use the Compliance Line described in this Policy.

STANDARDS OF CONDUCT AND BUSINESS ETHICS

Compliance with Law and Government Regulations

The Company and its employees, officers and directors must adhere to the highest ethical standards in every area of our business and in all of our daily activities and comply with all laws and regulations that apply to the conduct of the Company's business worldwide.

Product Quality, Drug and Device Laws

We are committed to providing our customers and the patients we serve with safe, effective, quality products that meet their needs and advance the delivery of patient care. We are proud to be employed in the business of serving the healthcare needs of patients and advancing medical knowledge and technology. We strive to find innovative solutions to the needs of customers and patients and to provide excellent service to all our customers.

We must comply with all applicable product regulatory requirements worldwide. These requirements relate broadly to many aspects of the development, manufacture and distribution of Bard products, the conduct of clinical studies, product design control, marketing applications and literature, quality system requirements, product labeling and advertising, customer complaint handling and post-market surveillance activities.

Bard management is responsible for overseeing a process for ensuring that the pertinent employees are aware of and comply with the product regulations applicable to their duties. Regulatory Affairs, Quality Assurance and Medical Affairs employees are responsible for ensuring that significant issues are reported to the Regulatory Affairs Department, and should express their independent views to that Department. If you are aware of any significant product regulatory or quality compliance issues or

concerns, report it to your supervisor, or to the Regulatory Affairs Department. Product quality is the business of every employee.

Any request by a government agency, such as the U.S. Food and Drug Administration, or other medical device regulatory bodies outside of the United States for an interview or information must be referred to your local Regulatory Affairs department head, who shall inform Corporate Regulatory Affairs of any non-routine request. Corporate Regulatory Affairs will determine whether to involve the Law Department.

Respect for Individuals and for Our Communities

Fair Employment and Business Practices, Respect for Others

We treat each other and our customers, vendors and other business partners and our competitors with respect, courtesy and fairness and comport ourselves in a professional manner. We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, material misrepresentation or other unfair dealing practice. We provide a respectful, professional and dignified workplace. We value diversity in our workforce, and are committed to equal opportunity and compliance with all fair employment practices and nondiscrimination laws.

We comply with all equal employment opportunity laws in all employment practices, including hiring, compensation, training, advancement, discipline and termination. We do not discriminate on the basis of race, color, religion, sex, national origin, age, disability, sexual orientation, genetic information, or status as a recently separated veteran, armed forces service medal veteran, disabled veteran or other veteran who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized or any other status protected by applicable law with respect to recruitment, hiring, training, promotion, and other terms and conditions of employment. We also provide reasonable accommodation to qualified individuals with disabilities and for religious obligations in accordance with applicable law and regulations.

Unlawful harassment or intimidation, whether sexual or racial or otherwise, is not tolerated. Retaliation for raising good faith claims of discrimination or unlawful harassment is prohibited.

Occupational Safety and Health

We care about the safety and health of our employees and visitors to our facilities. Employees must comply with all occupational safety and health laws applicable to their activities.

Community Service

We value community service and are committed to contributing to the communities in which we work and live. We actively encourage and support employee participation in volunteer community activities and proudly provide opportunities for volunteer service in partnership with community groups and service organizations.

Environmental Compliance

We respect our communities and we conduct our business in an environmentally responsible manner. We are required to comply with all applicable environmental protection laws and regulations.

Anti-bribery Laws

We will not offer, promise, authorize or give a bribe in order to gain a competitive advantage, influence the recipient's conduct, reward improper conduct, or cause another not to act in good faith, impartially or in accordance with a position of trust. We will not request, agree to receive, or accept a bribe. Business courtesies provided to others must be in conformance with all applicable laws and Bard policies.

Confidential Information, Intellectual Property

Our confidential information is a valuable asset that plays a critical role in our business success. Confidential information is information that is not readily available or generally known to others. The following are examples of our confidential information:

- our business plans, budget and strategic plans, sales and marketing plans and programs, sales figures and other financial information (see Reporting Material Information to the Investing Public and Securities and Exchange Commission, below),
- our technical know-how and information about research and development and manufacturing,
- information about business transactions, including acquisitions, divestitures and licensing activities,
- compensation and other employment information or personal information about Bard employees; succession planning; information about management changes or personnel reorganizations or any other internal reorganization or restructuring.

Confidential information may be recorded in many ways, including written letters, memoranda and drafts on paper, and also on film, video, audio and electronic media such as computer data. We protect our confidential information against unauthorized access and inappropriate disclosure, and we take precautions to protect it from damage or loss. We protect our proprietary intellectual property through patents, copyrights and trademarks and by guarding our trade secrets from disclosure.

We behave ethically with respect to confidential information belonging to others. We refuse to accept another party's confidential information except under appropriate circumstances, such as pursuant to a confidentiality agreement in connection with evaluating a proposed transaction with the other party or confidential patient information that is entrusted to us in connection with a clinical trial or a patient inquiry. When we do receive confidential information from others, we safeguard its confidentiality by complying with applicable laws and any applicable confidentiality agreement. We cooperate with our customers in safeguarding confidential patient information that the Company obtains from customers. We do not discuss confidential information about customers with third parties or others within Bard who do not need this information in connection with the conduct of Company business.

If you are not sure whether someone is authorized to receive information, or whether patient or any other information is confidential and must be protected, ask your supervisor. If you are asked for information about current or former employees, refer the request to the Human Resources Department.

Media, Analyst, Government or Attorney Contacts

Except in the case of inquiries to the Chief Executive Officer or the Chief Financial Officer, all inquiries from the media must be referred to the Vice President responsible for Media Relations. Inquiries from the financial community or securities analysts are to be referred to the Vice President – Investor Relations. Government agency contacts should be reported to the Law Department immediately, except that contacts from product regulatory agencies should be reported to your Regulatory Affairs department head (see [Product Quality, Drug and Device Laws](#), above). If a lawyer representing a third party contacts you, refer the attorney to the Law Department.

No employee, other than a corporate officer of C. R. Bard, Inc., or other designated employee, is authorized to accept service of a summons, lawsuit complaint, subpoena or other similar legal document on behalf of the Company or any of its subsidiaries. The Company has appointed a registered agent in every state in the United States in which it is qualified to do business for the purpose of accepting such service. If you receive a summons, lawsuit complaint, subpoena or other similar legal document by mail, contact the Law Department immediately.

Books and Records of Account

All Bard records and reports must be maintained accurately to ensure compliance with law and adherence to our ethical standards and to prevent fraudulent activities and errors. Applicable law and relevant accounting standards must be followed in maintaining and presenting accounting records and reports produced from those records. We do not knowingly give any false, misleading or incomplete information to anyone (external or internal) who is preparing or conducting any authorized audit of Company.

Finance and Accounting personnel are responsible for ensuring that any significant accounting, auditing and internal control issues have been reported to the Chief Financial Officer.

If you have any concerns, complaints or questions about accounting, internal control or auditing matters, you may bring them to the attention of the Audit Committee of the Board of Directors through the Compliance Line or other means discussed below under [Contacting the Non-Management Directors or Audit Committee of the Board](#).

Ethical Relations with Customers

We do not give or offer anything of value to illegally induce the purchase, lease, use, or recommended purchase, lease or use of our products or services. Our interactions with customers must not violate any laws and must be consistent with Bard policy and applicable professional or industry codes (for example, in the United States, the AdvaMed Code of Ethics on Interactions with Health Care Professionals).^{*} This prohibition extends not only to direct payments to customers, but also indirect payments made in any form through consultants or other third parties. Questions about legal

^{*} The Company has adopted the AdvaMed Code, which applies to many interactions with United States customers. Copies are available from your local Sales or Marketing management or the Law Department.

requirements and professional or industry codes concerning customer interactions should be directed to the Law Department.

Please refer to Dealings with Governments and Other Public Bodies and their Employees, below, for standards concerning interactions with customers who are government agencies or employees.

Business Courtesies

Offering or providing business courtesies (such as meals and travel expenses) are prohibited unless such courtesies are modest in value and otherwise comply with applicable law, Bard policy, and industry or professional codes. Further, any item provided to a health care provider must benefit patients or serve a genuine educational function.

Courtesies such as meals and receptions, when permitted, must be modest in value and related to a legitimate business purpose (for example, product demonstration, product offerings or training), subordinate in time and focus to the business at hand and in a setting that is conducive to the pertinent exchange of information.

See Conflict of Interest, below, regarding gifts offered to us.

Donations and Grants

We may make donations to charitable organizations where the donation involves a public benefit such as promoting the advancement of medical technology or patient care or where it serves a genuine educational purpose, or otherwise as a matter of good corporate citizenship. We may provide support for bona fide medical research, education and enhancement of professional skills, and we may underwrite continuing medical education and professional meetings in a manner that is permitted by applicable law and consistent with applicable professional or industry codes. Under no circumstances may we make charitable contributions to charitable organizations that are our customers or affiliated or closely connected with our customers if such contribution is designed to further sales or marketing objectives.

Payments to Customers

The Company may hire customers to perform bona fide research, consulting, training or other services, where the services provided satisfy a genuine business purpose and such need is identified before the services are contracted.

The remuneration to the customer for bona fide services shall not exceed fair market value for the services provided and may include payment for the reasonable and actual costs incurred. The terms of any consulting or other similar arrangement with a customer must be in a writing approved by the Law Department and must comply with applicable law and industry or professional codes.

The setting for meetings with consultants who are customers must be appropriate to the subject matter of the consultation and conducive to the effective exchange of information or otherwise appropriate to the business purpose of the meeting. Business courtesies, such as reimbursement for meals and travel expenses may be allowed under local rules, but no entertainment or gifts may be provided to such consultants either directly or indirectly by Bard.

Training in the Safe and Effective Use of Our Products

We have a responsibility to provide our customers with appropriate instruction, education and training in the safe and effective use of our products. Payment of training fees to trainers, and reimbursement of any travel, lodging or meal expenses for participants, must comply with applicable law, Bard policy and any applicable industry or professional codes.

Assistance with Drafting of Medical Manuscripts

We recognize that disclosure of authorship of medical articles for publication in medical journals and other publications is critical to the medical profession and the public in order for there to be proper credit and responsibility for the content of the publication. We will not engage, directly or indirectly, in ghostwriting of manuscripts. We will ensure that if the Company has made substantial contributions to the drafting, editing, and/or data analysis of a medical manuscript, the Company's participation will be disclosed in the manuscript and in all subsequent publications. We will not knowingly submit false or misleading information about our products for publication or presentation.

Dealings with Governments and Other Public Bodies and Their Employees

Illegal Payments

We do not provide any financial or other advantage or anything else of value, directly or indirectly (for example, through a third party), as a bribe or kickback, or for any illegal purpose, to or for the benefit of any U.S. government official, representative or employee, any government entity of any other country or any U.S. or foreign government-owned company. The term government official should be interpreted broadly, to include any government employee or representative, as well as candidates for political office, political parties and party officials, and employees of public international organizations, such as the World Health Organization. Government officials also include private persons who are acting in an official capacity on behalf of a government agency (for example, a group of outside experts convened to provide advice to a government).

We do not give gifts or anything else of value to any government officials to influence or reward them in any way, or as an inducement to purchase, prescribe, license, register or approve our products. We

also do not give gifts or anything else of value that we have reason to believe will be passed on to a government official for such a purpose.

Except with the prior approval of the Law Department, you may not provide a gift or courtesy to a government employee or official.

Government Procurement

Most countries have complex laws concerning government procurement. Contracting with government agencies, such as a country's or locality's public health or hospital system or the U.S. Department of Defense or Veterans Administration, is subject to strict and detailed requirements that may cover pricing and discounts, disclosure obligations and permitted sourcing of products supplied, among other things. All government contracting must comply with applicable law and Bard policy, including responses to procurement offers or solicitations of business or procurement offers from governments or government agencies. Also, many types of relationships with customers that would otherwise be considered lawful and ethical, including modest meals, are prohibited when dealing with governmental employees or officials.

Political Activities and Contributions, Lobbying

Bard supports your right to participate in the democratic political process and encourages active citizenship by employees; however, we must also comply with the legal requirements concerning political action by the Company.

We may not contribute any Company funds, time or other resources to support any political candidate or political party, unless it is permitted by applicable law and Bard policy. The Company cannot reimburse you for your personal political contributions, including contributions to the Company political action committee, and you must not seek such reimbursement. Any political activity in which you engage is in your personal capacity and not as a representative of the Company.

The Company has the right and sometimes the responsibility to offer recommendations concerning laws and governmental actions and issues that affect our business, our communities or healthcare, and to take public positions on such issues. Participation by employees in any political activity is strictly voluntary, and each employee may decide whether to exercise his or her personal support of any candidate, proposed law or proposed government action without fear of reprisal.

No lobbying activity or other effort to influence the passage of any law is conducted by or on behalf of the Company except with the approval of the Chief Executive Officer and in compliance with all lobbying laws.

Political contributions by Directors and Corporate Officers, and their immediate family members, should be reviewed by the Law Department before the contribution is made to ensure that no state or local laws will be violated, and so that we may comply with reporting requirements of state and federal disclosure laws.

Code of Ethics for Senior Financial Officers



In addition to being governed by this Policy, the Chief Executive Officer, the Chief Financial Officer and Controller of the Company are subject to the Code of Ethics for Senior Financial Officers, which governs a number of areas, including:

- Conflicts of Interest
- SEC Filings and Public Communications
- Compliance with Applicable Laws, Rules and Regulations
- Reporting of Violations

Inside Information – Securities Trading

Trading in securities while aware of material, nonpublic information is illegal. Nonpublic information is information that has not been broadly disseminated to the public. Material information is information that a reasonable investor would consider important in making an investment decision.

No Bard employee, officer or director may trade in the Company's stock or have someone else do it for them, when he or she is aware of material, nonpublic information.*

Also, no Bard employee, officer or director may trade in securities of another company when he or she is aware of nonpublic information that is material to the other company's securities. If you are unsure whether information is material or nonpublic, or whether someone is authorized to receive information, ask the Law Department.

Please refer to Corporate Policy III-9 – "Acquisition/Disposition of Securities of C. R. Bard, Inc by Executive Officers and Directors" and Corporate Policy III-11 – "Trading in Company Securities, Inside Information" for more details relating to trading in securities of the company.

Reporting Material Information to the Investing Public and the Securities and Exchange Commission

Bard is committed to ensuring that information in its public communications, including reports and documents furnished to the Securities and Exchange Commission, is full, fair, accurate, timely and understandable. All employees, officers and directors involved in the Company's disclosure process are responsible for acting in accordance with this Policy. In particular, these individuals should be familiar with the disclosure requirements applicable to the Company and are prohibited from knowingly misrepresenting, omitting or causing others to misrepresent or omit material facts about the Company to others, whether within or outside the Company, including the Company's independent auditors.

We are required to avoid selective disclosure of material, nonpublic information. No employee, officer or director of the Company is authorized to speak on behalf of the Company, nor may any of them disclose material, nonpublic information to any person outside the Company, except in accordance with the Company's policies designating authorized spokespeople and has in place procedures to ensure the broad public dissemination required by the law when material information is disclosed. See also Confidential Information, Intellectual Property, above.

* The sole exception to this prohibition is if the purchase or sale is made pursuant to a pre-existing plan or arrangement complying with Rule 10b5-1 under the Securities Exchange Act of 1934 and approved in advance by the Law Department. Such approval will only be granted to those who regularly receive material, nonpublic information about the Company in the ordinary course of their employment.

Conflicts of Interest

Every employee, officer and director must act in the best interests of Bard and avoid situations that involve, or may be reasonably expected to involve, a conflict between his or her interests and the interests of Bard. A conflict of interest exists when the private interests of an employee, officer or director interfere, or appear to interfere, in any way with the interests of Bard. A conflict can arise when an employee, officer or director takes actions or has interests (financial or otherwise) that may impact their ability to perform their work at Bard objectively and effectively. A conflict can also occur if an employee, officer, director, or members of that person's family, receives improper personal benefits as a result of his or her position with Bard, regardless of whether the benefits are received from Bard or a third party. It is not possible to list every possible form that a conflict of interest could take, but the following are illustrations of how we avoid conflicts of interest:

- We must select vendors and other business partners on the basis of such considerations as quality, price, reliability, service and delivery terms, and not based personal friendships or family connections or potential of personal financial gain;
- We may not accept gifts or loans or any other valuable benefit from suppliers except inexpensive, noncash gifts if permitted by applicable law and consistent with local business custom and any applicable professional or industry codes;
- We may not make unauthorized use of Bard property, employees, products, supplies or other resources, including information, for our outside activities or any other purpose. Employees may not engage in any other business than Bard's during their scheduled working hours;
- If we become aware of a business opportunity that could be of interest to or benefit the Company, we must inform our supervisor and may not take the opportunity for ourselves or refer it to a friend or relative;
- Bard employees may not accept any office or directorship in a for-profit business entity without the prior written approval of the Chief Executive Officer;
- Bard employees must not participate in any business dealings that would allow them to profit, directly or indirectly, because they are an agent, owner, stockholder, employee, officer or director of a Bard supplier or customer; and
- We do not suggest or imply that we are representing Bard in any outside activity, except when authorized to engage in that activity expressly in the capacity of a Bard representative and on behalf of Bard.

Before entering into any activity or relationship that might be, or appear to be, a conflict of interest, or that might reflect adversely on Bard, employees must fully disclose all the relevant facts to their manager. That manager shall consult with their local Human Resources Department and/or the Law Department, and a determination will be made as to whether the activity is permissible. If you have any questions about whether an existing or proposed outside activity or relationship with another business must be disclosed, you should contact your manager or your local Human Resources manager.

Antitrust Laws

We comply with antitrust, fair competition and anti-monopoly laws of the countries in which we conduct business. We support the intent of these laws to foster fair competition and protect consumers from unfair business practices.

We do not enter into collaborative action with any competitor without prior consultation with the Law Department, and we do not engage in prohibited activities. The following are some examples of situations that should be avoided:

- Proposals to share prices or other competitive marketing information with a competitor, or to allocate markets or customers.
- Attempts by customers or potential customers to prevent Bard from doing business with another customer.

We must take care to avoid discussions at industry or trade association meetings on topics that are competitively sensitive, such as prices or other terms or conditions of sale, sales or marketing strategies, costs or products under development. Also, selling products to customers is not the only market in which we compete. We also compete with other companies in the hiring market. Therefore, agreements to fix salaries or benefits or to divide recruiting territories are also prohibited, as is sharing information about compensation with competitors.

You should not discuss subjects with competitors or customers that raise antitrust concerns and if a competitor or a customer tries to raise such a subject with you, you should refuse to discuss it, terminate the discussion immediately and report the incident to the Law Department.

Import and Export Laws, Economic Sanctions and Anti-boycott Laws

Bard, our agents and representatives must comply with all applicable laws governing the export and re-export of products, software and technology from the United States. We must obtain and comply with the terms and conditions of all necessary export/re-export licenses, and otherwise take measures to ensure that our products are not improperly exported/re-exported or diverted to prohibited persons, end users or destinations that are subject to sanctions imposed by the United States. We also abide by the export control, import and sanctions laws of other countries in which we do business, unless such laws conflict with applicable United States laws, in which case the Law Department should be consulted promptly.

We must also comply with the laws and regulations governing the importation of products into the United States and the local import laws and regulations of the countries in which our products are sold. We accurately report tariff classifications, the quantity and value of imported merchandise to the applicable customs authorities, ensure that our products are labeled and marked in accordance with United States and local customs regulations, and otherwise exercise reasonable care with respect to the conduct of our import activities.

We will not cooperate with, further or support any prohibited boycott intended to discriminate against other persons based on race, religion, sex, national origin or nationality. Any request to cooperate with

or participate in such a prohibited boycott, or request for information designed to verify compliance with a boycott, must be immediately reported to the Law Department.

Agents Acting on Bard's Behalf

We expect our independent dealers, distributors and agents to abide by this Policy as appropriate in dealings on the Company's behalf. The Company manager responsible for a relationship with an independent dealer, distributor or agent must ensure that the terms of the relationship are established in a written agreement and that the independent dealer, distributor or agent has been given a copy of this Policy.

WAIVER OF POLICY

Any waiver of the provisions of this Business Ethics Policy for executive officers or directors may be provided only by the Company's Board of Directors or a committee of the Board and must be disclosed to shareholders.

EMPLOYEE RESPONSIBILITY; RAISING CONCERNS, REPORTING SUSPECTED VIOLATIONS; ENFORCEMENT*

Employee Responsibility

Compliance with the Bard Business Ethics Policy is the responsibility of all officers, employees and, as applicable, our directors. Compliance is monitored by supervisors, under the guidance of corporate officers and the Chief Compliance Officer, or any Compliance Coordinator, and is subject to audit.

Annually, each Bard employee must sign a statement that he or she has received a copy of the Business Ethics Policy and that he or she understands the Policy and that compliance with it is mandatory. At least once each year, corporate officers and other key employees must confirm in writing that they have conducted all operations under their supervision in accordance with the Policy. New employees shall receive a copy of the Business Ethics Policy during orientation, are required to read it and must sign a statement that they understand the Policy and have received a copy.

What to Do if You Suspect a Violation or Have any Concerns or Questions

Employees are encouraged and expected to report to their supervisor, local management or to the Chief Compliance Officer, any Compliance Coordinator, or by calling the toll-free Compliance Line discussed below, if they suspect any violation of the law or of the Business Ethics Policy.

* This Section is a summary of the Company's policies and procedures concerning the raising of concerns, reporting of violations, and monitoring, auditing and enforcement of the Business Ethics Policy, which are set forth in more detail in the Corporate Compliance Policy.

Non-Retaliation

There is no penalty for good faith reporting of any suspected violation, and Bard policy prohibits retaliation against anyone for making a good-faith report. Reports may be made anonymously. All reports of suspected violations are taken seriously and will be promptly investigated by the Company as appropriate. The identity of the person making the report and the fact that a report was made will be kept confidential except as otherwise required by law, and to the extent possible while allowing an investigation to proceed. You should be aware that if you do not provide your name, the Company's ability to investigate the matter may be limited by the inability to follow up with you to obtain further details.

Any supervisor who receives a report of a suspected violation must immediately notify local management, the Chief Compliance Officer, or any Compliance Coordinator.

The Compliance Line

The Compliance Line is a telephone number that is available 24 hours a day, 7 days a week. Calls to the Compliance Line cannot be traced. The toll-free number for calls from within the United States is **877-285-4158**. Calls from other locations require that you first dial a country-specific AT&T Direct access code. The list of AT&T Direct access codes may be found at AT&T's website: www.att.com/traveler. Reports of calls to the Compliance Line are forwarded to the Chief Compliance Officer for review and investigation, as necessary. The Chief Compliance Officer may delegate this responsibility to any Compliance Coordinator.

Contacting the Non-Management Directors or Audit Committee of the Board

You may also use the Compliance Line to contact the non-management members of the Board of Directors, or bring complaints or questions about accounting, internal controls or auditing matters to the attention of the Audit Committee of the Board, or you may e-mail them at Directors@crbard.com or write to them at the address of the Company's corporate offices: C. R. Bard, Inc., 730 Central Avenue, Murray Hill, NJ 07974.

Penalty for Violation of Policy

In addition to any penalties imposed by law, any employee who has violated the law or the Business Ethics Policy will receive prompt and appropriate discipline, which may include termination of employment.

Review of Policy

The Chief Compliance Officer, together with management, will review the Business Ethics Policy at least annually and make changes as appropriate.

V. IMPLEMENTATION

The provisions of this document will be implemented immediately.

VI. EFFECTIVE DATE

This Policy shall be immediately effective upon approval.