

## Anti-Slavery and Human Trafficking Statement for year ending December 2023

This statement addresses the California Transparency in Supply Chains Act (2020), the United Kingdom's Modern Slavery Act (2015) and the Australian Modern Slavery Act (2018) on issues of slavery, servitude, forced or compulsory labor and human trafficking. This statement sets out the steps Bristol Myers Squibb (BMS) has taken, including through the end of its fiscal year ending December 31, 2023, to address and mitigate the risk of modern slavery or human trafficking in its supply chains or in any part of its business.

### BMS' Commitment

Consistent with our values, we are a strong supporter of human rights globally in our workplace, at our facilities, in our external supply chain and in our communities. We do not condone slavery or human trafficking of any kind and are committed to reducing the risk of slavery and human trafficking in our business and supply chain.

BMS is a signatory of the United Nations Global Compact and supports the 10 principles set out in this framework on human rights, labor, environment, and anti-corruption, specifically the elimination of all forms of forced and compulsory labor. Since 2011, we have submitted our annual Communication on Progress, which further outlines our commitment to these principles and highlights the many ways we bring them to life through our people and our practices in our everyday business.

We also continue to evolve our collaboration with Truckers Against Trafficking (TAT), which was established in 2019. We promote TAT across our organization through programs like Trafficking Awareness Month which provide employees with tools and resources for how they can help prevent human trafficking. Externally, we work with our transportation suppliers to raise awareness through collaborative education sessions on ways in which they can identify and prevent human trafficking.

BMS participates in the Pharmaceutical Supply Chain Initiative (PSCI), a group of pharmaceutical companies that have established the Principles for Responsible Supply Chain Management (PSCI principles). The PSCI principles promote responsible business practices, including human rights, labor, and ethics practices, among pharmaceutical suppliers. BMS has directly and indirectly supported PSCI-sponsored supplier capability-building conferences and auditor training conferences in key regions of the world.

### BMS' Positions and Standards

BMS has outlined specific standards and responsibilities concerning anti-trafficking, modern slavery and human rights in the following documents:

- **BMS's Global Position Statement on Human Rights** details our core human rights protection principles. Our commitment embraces internationally recognized human rights standards, including:
  - The United Nations Guiding Principles on Business and Human Rights (UNGPs)

- The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- The International Bill of Human Rights, consisting of:
  - The Universal Declaration of Human Rights (UDHR)
  - The International Covenant on Civil and Political Rights (ICCPR)
  - The International Covenant on Economic, Social, and Cultural Rights (ICESCR)
  - The International Labour Organization's (ILO) Core Labour Rights Conventions
  - The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The **BMS Principles of Integrity** provide guidance on the ways in which we conduct business in a compliant and ethical manner. These Principles embody our high standards of ethical behavior and form the basis for our interactions with our employees, patients, customers, shareholders and the global community. The Principles support the guidance established under the United Nations Universal Declaration of Human Rights and reinforces our commitment to human rights, stating that we “support and respect the protection of human rights and . . . avoid complicity in human rights abuses.”
- Our **Standards of Business Conduct and Ethics for Third Parties (3P Standards)** sets the expectations that our suppliers and business partners will ensure responsible sourcing in their operations. Among other points, the 3P Standards specifically forbid the use of forced or involuntary labor of any kind. The 3P Standards have been translated into 12 languages to support the global supplier base.
- **BMS' Environmental, Social, and Governance (ESG) Report** highlights our annual progress across our environmental, social, and governance commitments.

We require all our employees to know and to adhere to our Principles of Integrity. We also require our contractors, consultants, vendors, and any individuals who do business with BMS to comply with the 3P Standards.

### **Supplier Expectations**

BMS sets expectations that its suppliers and partners are operating with responsible practices in their operations, including respecting human rights and labor, and complying with the laws of the countries in which we do business. In our 3P Standards, which are part of our supplier qualification process, we outline these expectations and include an Acknowledgment of Terms.

### **Supply Chain Verification**

Supplier due diligence is a critical element in helping to ensure that our suppliers and business partners are upholding the principles that we outline in our Standards of Business Conduct and Ethics for Third Parties. We work hard to manage and monitor that our suppliers and partners are operating with responsible sourcing practices in their operations. Included within this expectation is respecting human rights across the value chain and complying with the laws of the countries in which we do business.

As part of an evolution to elevate and clarify expectations for suppliers, BMS established its Responsible Sourcing Program (RSP). The program is designed to enable better visibility of our supply chain through greater monitoring, engagement and enhanced supplier requirements. RSP leverages EcoVadis to assess and evaluate BMS suppliers on critical risk areas including labor and human rights. As part of the program, suppliers are required to not engage with, directly or indirectly, individuals or entities identified on any sanctioned or restricted parties list.

RSP development, program preparation, and ways of working were refined in 2023 and will be rolled out to suppliers, beginning in Q1 2024. As part of the program, BMS will leverage tools to prioritize supplier engagement and assessment, with risk being a key factor. Improvements to address risk will follow the RSP Guidance Model, which outlines a road for improvement and is centered around a risk-based approach. Suppliers identified to have higher risk revealed through the RSP may have more due diligence or follow up required.

### **Training**

Regular training and awareness around BMS policies and procedures is an essential element to ensure that our employees, contractors and suppliers are upholding the values and principles that we set forth in our policies and procedures.

We require all our employees to know and to adhere to our Principles of Integrity. We also expect our contractors, consultants, vendors, and any individuals who do business with BMS to comply with the Standards of Business Conduct and Ethics for Third Parties.

In addition, our employees have voluntary training opportunities to ensure ongoing awareness and compliance with our policies and standards.

### **Reporting**

BMS offers an Integrity Line for employees and Third Parties to report concerns related to potential violations of our policies, principles, and standards, as well as other ethical and legal violations. The Integrity Line is available 24 hours/7-days a week via telephone or web. This confidential reporting system is available in multiple languages and can be found at [bms.integrity.ethicspoint.com](https://bms.integrity.ethicspoint.com). If we learn of any allegations of slavery or trafficking through the Helpline or any other means, BMS is committed to promptly investigating and acting to remediate the situation in a responsible manner.

Approved by Committee on Directors and Corporate Governance Signed and dated by:



Chris Boerner, PhD

Chief Executive Officer  
February 2024