

## Rules of procedure

### On the complaint procedure in case of violations of the Supply Chain Due Diligence Act (§ 8 para. 2 LkSG)

#### 1. Background and Purpose

The Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains (Supply Chain Due Diligence Act - LkSG) came into force on 01.01.2023.

The aim of the law is for companies to appropriately observe human rights and environmental due diligence in their own business area and along their supply chains, with the aim of preventing or minimizing human rights or environmental risks, or ending the violation of human rights-related or environmental duties.

To this end, the LkSG requires, among other things, the establishment of an appropriate complaint procedure, through which both internal (e.g., employees) and external persons (e.g., suppliers) can turn to the company to point out human rights and environmental risks or violations. In addition, companies must publish a procedural order that describes the complaint procedure in more detail (§ 8 para. 2 LkSG).

#### 2. Purpose of the Complaint Procedure

- a. On the one hand, the complaint procedure is intended to serve as an early warning system so that problems can be identified early on before there is a violation of human rights or environmental concerns.
- b. On the other hand, the complaint procedure should provide an access point to the company in case human rights or environmental concerns are endangered or violated, so that the company can quickly take remedial action.

#### 3. Scope of Application

##### a. Who can turn to the complaint channel?

The procedure can be used by all employees of Bristol-Myers Squibb.

In addition, the complaint procedure is also available to our indirect and direct suppliers and their employees. Likewise, people who are not directly affected by risks or violations can use the complaint procedure.

##### b. What complaints can be submitted?

All complaints can be submitted that point Bristol-Myers Squibb to human rights and environmental risks or violations in their own business area or along their supply chain. This includes the immediate (direct suppliers) as well as the indirect supply chain (suppliers of suppliers).

##### c. For which companies does this procedural order apply?

This procedural order applies to the following Bristol-Myers Squibb companies:

- Bristol-Myers Squibb Holdings Germany Verwaltungs GmbH
- Bristol-Myers Squibb Holdings Germany GmbH & Co. KG

- Bristol-Myers Squibb Verwaltungs GmbH
- Bristol-Myers Squibb GmbH & Co KGaA

d. How can complaints be submitted?

Within Bristol-Myers Squibb, the Compliance/Legal department is responsible for monitoring the requirements arising from the LkSG. It therefore also accepts corresponding indications and follows them up. Contact with the Compliance/Legal department is possible via the following channel:

- Integrity Line: [EthicsPoint - Bristol Myers Squibb](#)

There it is possible to submit indications confidentially or anonymously. You can submit your indication in various languages, by phone or in writing.

4. Description of the Complaint Procedure / What happens to the complaint after receipt?

Upon submission of a hint, you will receive an acknowledgment of receipt.

Subsequently, the hint will be checked by the Compliance/Legal department to see if the hint falls within the scope of the complaint procedure. In case of rejection, you will receive a brief explanation.

If the hint falls within the scope of the complaint procedure, you will timely receive a notification about the next steps, the probable timeline of the procedure, as well as where and when you will be informed about the progress of the procedure. Furthermore, you will be informed about your rights regarding protection against discrimination or punishment.

In the case of an unfounded hint, you will receive a summary of the reasons.

The Compliance/Legal department will also contact you to discuss the facts in more detail or to better understand them.

The Compliance/Legal department will also inform you about which preventive or remedial measures have been planned or carried out. The result will be discussed with you afterwards and the procedure will thus be terminated.

5. Protection of the Complainant

When you submit hints, you are also protected from disadvantages in whatever form.

To ensure confidentiality, we ask you to use our Integrity Line.

Our employees of the Compliance/Legal department are obliged to maintain confidentiality. They are also appropriately trained and follow up on the hints impartially and independently. They are not bound by instructions. In this way, we try to minimize the risk of accidentally revealing your identity as much as possible.

Optionally, you can also submit hints anonymously. However, this can make cooperation more difficult.

## 6. Review

The complaint procedure is reviewed annually and on an event-related basis for its effectiveness. In doing so, we continuously develop our complaint procedure based on the insights gained. We also take into account any publications by government agencies, as well as new legislation.

This procedural order is published in German and English. If we identify further relevant target groups, this procedural order will also be translated into other languages.

The procedural order comes into effect on 01.01.2024 and will be published on the website of Bristol-Myers Squibb Germany.