

## **Anti-Slavery and Human Trafficking Statement for year ending December 2019**

The United Kingdom's Modern Slavery Act of 2015 addresses issues of slavery, servitude, forced or compulsory labor and human trafficking. The California Transparency in Supply Chains Act of 2010 is a law designed to increase the amount of information made available by manufacturers and retailers regarding their efforts to address the issue of slavery and human trafficking. This statement sets out the steps Bristol Myers Squibb has taken, including through the end of its fiscal year ending December 31, 2019, to address and mitigate the risk of modern slavery or human trafficking in its supply chains or in any part of its business.

### **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.

Bristol Myers Squibb joined the United Nations Global Compact in 2010 and supports its ten principles on human rights, labor, environment and anti-corruption, specifically the elimination of all forms of forced and compulsory labor. In 2019 we initiated a collaboration with Truckers Against Trafficking (TAT) and became an official member of the TAT shipping partners program, which engages major purchasers of shipping to encourage their carriers in the effort to discover and disrupt human trafficking networks. Bristol Myers Squibb is a founding member and 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. Bristol Myers Squibb has directly and indirectly supported PSCI-sponsored supplier capability-building conferences and auditor training conferences in key regions of the world (including in India and China). Bristol-Myers Squibb has also supported local sub-teams in China and India, which PSCI established to increase capability.

### **Accountability Standards**

The "Principles of Integrity: the Bristol Myers Squibb Standards of Business Conduct and Ethics" (Principles) 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."

Bristol Myers Squibb's Global Position Statement on Human Rights details its core human rights protection principles. Bristol Myers Squibb fully supports the principles established under the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

We also have developed a Standards of Business Conduct and Ethics for Third Parties policy (3P Standards), which sets our expectations for our suppliers and business partners that they 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. These 3P Standards were updated in 2019 and align with the increased focus on human rights. The PSCI principles for responsible supply chain management were incorporated into the 3P Standards and the human

rights commitment in the 3P Standards was strengthened to align with the PSCI's increased focus on human rights. The 3P Standards have been translated into 12 languages to support the global supplier base.

We require all our employees to know and to adhere to our Principles. We also require our contractors, consultants, vendors and any individuals who do business with Bristol Myers Squibb to certify compliance with the 3P Standards. Our Principles and the 3P Standards are available on our website and are accessible via the following links:

[Principles of Integrity: BMS Standards of Business Conduct and Ethics](#)

[Our Standards of Business Conduct and Ethics for Third Parties](#)

Bristol Myers Squibb offers a Compliance and Ethics Helpline for employees and third parties to report concerns related to potential violations of, and to ask questions about, the Principles and the 3P Standards. If we learn of any allegations of slavery or trafficking through the Helpline or any other means, we will promptly investigate and act to remediate the situation in a responsible manner.

### **Supplier Certification**

The 3P Standards include an Acknowledgment of Terms requiring, among other things, our suppliers to identify the following: the individual responsible for the supplier's compliance, the procedures in place to meet the 3P Standards, any discrepancies between the supplier's operations and the 3P Standards and any similar policy used by the supplier. The 3P Standards are part of Bristol Myers Squibb's supplier qualification process and all of the company's suppliers are required to review the 3P Standards and to certify compliance with them. We also require our suppliers in contractual agreements to comply with applicable laws and regulations of their respective countries, including those related to human rights and labor.

### **Supply Chain Verification**

To combat the risk of slavery and human trafficking in our supply chain, Bristol Myers Squibb has implemented an ongoing risk assessment system through its Procurement Risk Assessment and Mitigation (PRAM) program, which it administers. Our PRAM program is a supplier qualification process that collects information on not only our suppliers' ability to provide goods or services but also on their environment, health and safety (EHS), labor and ethics practices. If a supplier presents an ethics or labor risk based on the information collected, we will review the arrangement with the supplier and conduct further due diligence to assess the extent to which it complies with ethics or labor requirements. Potential new suppliers identified in a higher risk geography and industry will be subject to increased scrutiny.

### **Supplier Audits**

Bristol Myers Squibb conducts audits of its suppliers on a global basis in areas such as quality, EHS and finance. Audits for labor and integrity are conducted as required on critical third-party manufacturers in high-risk countries based on the Human Slavery Index and higher risk countries (according to PSCI). Even though Bristol Myers Squibb does not in the normal course of business perform audits (independent, unannounced or otherwise) solely to determine compliance with company standards against human rights and labor deviations, in some instances we have engaged third-party auditors to evaluate compliance with human rights and labor standards. We address

critical instances of nonconformance to the 3P standards by suppliers regarding human rights and labor deviations identified during audits by developing corrective and preventative action plans with the suppliers to help ensure that deviations are corrected. Suppliers that fail to make progress toward corrective and preventative action plans within an agreed timeframe are subject to review and sanctions, including potential termination. Audits on Bristol Myers Squibb suppliers were undertaken over the reporting period and findings from audits were addressed with suppliers in line with its policies as described in this statement.

### **Training**

On a worldwide basis, Bristol Myers Squibb requires training of our employees bi-annually on the Principles, with content specific to recognizing possible signs of slavery and human trafficking and mitigating risks.

All key executives and managers who have direct responsibility for supply chain procurement are required to complete training on the 3P Standards.

Approved by Committee on Directors and Corporate Governance

Signed and dated by:

A handwritten signature in black ink, appearing to read "Giovanni Caforio". The signature is written in a cursive, flowing style.

Giovanni Caforio, M.D.  
Chairman of the Board and Chief Executive Officer  
June 2020