



EHS Evaluation Program Attestation

Specialty Technical Consultants, Inc. (STC) was engaged by Bristol-Myers Squibb Company (BMS), to perform a quality assurance review of its internal Environment, Health and Safety (EHS) Evaluation Program. The objective of this review was to determine if internal EHS audit systems are functioning effectively to maintain and continually improve EHS performance and to verify that the Evaluation Program was operating in conformance with established procedures and selected external consensus standards.

STC's review process included the observation of an EHS Evaluation site visit, interviews with Evaluation Program staff and key stakeholders, and review of audit documents. Data gathering took place during November 2010.

STC found that the BMS EHS Evaluation program conforms to the organization's Corporate Evaluation SOP (CEHSS-ADM-007) and to the external standards against which it was compared. We identified several program strengths including:

- Frequent and effective audit communications;
- Lead Evaluators who are well prepared and effectively organize the activities; and
- The use of Team Evaluators from other BMS facilities to "cross-pollinate" effective EHS practices.

Finally, we made several recommendations for improvement, the majority of which relate to BMS's ongoing efforts to improve the scoping of individual audits and ensure a comprehensive evaluation of EHS compliance and management systems.

It is our opinion that the BMS EHS Evaluation Program is an effective tool to help the company manage EHS risks and continually improve EHS performance.

Barbara Jo Ruble, QEP, CPEA
President
Specialty Technical Consultants, Inc.
December 2010