

Policy statement on the Supply Chain Due Diligence Act (SCDDA)

2024

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Introduction

Our mission at Bristol Myers Squibb “to discover, develop and deliver innovative medicines that help patients prevail over serious diseases,” is helping to advance human rights in the communities we serve worldwide.

We have committed to our patients, customers, employees, global communities, shareholders, and other stakeholders that we will act on our belief that the priceless ingredient of every product is the integrity of its maker. As such, we operate with effective governance and high standards of ethical behavior.

This position on human rights is informed by ongoing due diligence, internal and external feedback, and engagement with external experts, peers, shareholders, and stakeholders.

Our Commitment to Human Rights

Bristol Myers Squibb is committed to respecting human rights throughout our own business and our value chain. Our commitment embraces internationally recognized human rights standards, including:

- The United Nations Guiding Principles on Business and Human Rights (UNGPs)¹
- The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises²
- The International Bill of Human Rights, consisting of:
 - The Universal Declaration of Human Rights (UDHR)³
 - The International Covenant on Civil and Political Rights (ICCPR)⁴
 - The International Covenant on Economic, Social, and Cultural Rights (ICESCR)⁵
- The International Labour Organization’s (ILO) Core Labour Rights Conventions⁶
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work⁷

We take our commitment to economic, social, and environmental sustainability seriously, and extend this expectation to our partners and suppliers. We promote human rights within our own workforce and with our suppliers and strive to comply with the law in the countries where we do business. We outline supplier expectations in our Standards of Business Conduct and Ethics for Third Parties, as well as our supplier contracts. Among other things, this includes a commitment to fair working practices, non-discrimination and non-harassment as well as maintaining a safe and healthy working environment.

We commit to respecting international labor rights as articulated in Articles 23 and 24 of the UDHR, Articles 6-11 in the ICESCR, Article 8 of the ICCPR, and the ILO Core Labour Rights Conventions in our operations and contractually with our third parties through the Bristol Myers Squibb Standards of Business Conduct and Ethics for Third Parties.⁸ This commitment includes upholding the following:

- *Voluntary Employment*: Bristol Myers Squibb prohibits forced, bonded, enslaved, indentured or involuntary prison labor, or engagement in human trafficking.⁹
- *Child Labor and Young Workers*: Bristol Myers Squibb prohibits the use of child labor. Young workers under the age of 18 may only engage in nonhazardous work and only if permitted by local laws and regulations. All employees of Third Parties should be above a country’s legal age for employment, or the age established for completing compulsory education.
- *Anti-Slavery and Human Trafficking*: We condemn 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.
- *Non-Discrimination and Fair Treatment*: Bristol Myers Squibb prohibits discrimination and harassment. Discrimination for reasons such as gender, race, color, religion, national origin, age, physical or mental

disability, pregnancy, citizenship, status as a covered veteran, marital status, sexual orientation, gender identity and expression, or any other characteristic protected by law is not permitted. Third Parties should provide a workplace that is free of human rights abuses, including sexual harassment, sexual abuse, corporal punishment, excessive force, mental or physical coercion, and verbal abuse, or threats of such actions.

- *Wages, Benefits, and Working Hours:* Bristol Myers Squibb pays workers in compliance with applicable wage laws, including minimum wages, overtime hours, and mandated benefits.
- *Freedom of Association:* Bristol Myers Squibb respects the rights of workers, as outlined in local laws, to associate freely, join or not join labor unions, seek representation, and join workers' councils. Workers should be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation, or harassment.

Furthermore, this includes the prohibition of forced eviction according to the LkSG, the prohibition of disregard for human rights through the use of security forces, compliance with the Minamata Convention on Mercury, compliance with the Stockholm Convention on Persistent Organic Pollutants (POPs Convention), and compliance with the Basel Convention on the Export of Hazardous Wastes. If stricter laws apply that go beyond international standards, we are committed to complying with them.

Bristol Myers Squibb takes its compliance and ethics responsibilities seriously and is committed to doing business only with third parties who share our high standards for ethical behavior. For this purpose, Bristol Myers Squibb has established standards for business conduct and ethics for third parties (3P Standards¹⁰), which we also include in our supplier contracts. We encourage our suppliers to also implement appropriate processes to respect human and environmental rights. This also includes passing on these expectations along the supply chain.

We embrace a diverse and inclusive workforce and promote our employees' health, safety, and equitable and respectful treatment without discrimination or harassment as outlined in our Principles of Integrity.¹¹ These Principles apply to all Bristol Myers Squibb employees, as well as contractors working on behalf of Bristol Myers Squibb. In addition, our comprehensive Occupational Health and Safety Standards Manual, part of our Health & Safety Management framework, focuses on compliance, training, and continuous improvement.

We are a signatory of the UN Global Compact and support the 10 principles set out in this framework on human rights, labor, environment, and anti-corruption. The UN Global Compact, launched in 2000, is a principle-based framework for businesses, stating 10 principles in the areas of human rights, labor the environment, and anti-corruption.¹² For the last 10 years, we have submitted our annual Communication of Progress.

Governance

We are firmly committed to uncompromising quality, integrity, compliance, and ethics in everything we do. As we work to transform patients' lives through science, we operate with effective governance and the highest ethical standards to deliver our mission.

This policy statement was created by a local working group - based on the Global Position Statement on Human Rights¹³ developed by global ESG and Ethics & Compliance teams. As part of Bristol Myers Squibb' ESG Governance and Operating model, the HRGPS was reviewed and approved by the Bristol Myers Squibb ESG Council, a cross-functional senior management committee led by the Vice President of Purpose and ESG and includes leaders from Ethics & Compliance, Legal, Supplier Diversity & Procurement, Environment Health Safety & Sustainability, and Global Product Development & Supply.

Updates related to human rights and environmental protection, including risks and opportunities, are reported to the managing director at least once a year and on an ad hoc basis. An internal working group is responsible for the continuous development of the human rights strategy.

Our human rights commitments are global and apply to our own operations and across our value chain. We systematically identify and review policies and procedures across our company and update them to ensure alignment with our human rights and environmental commitments.

In addition to our Human Rights position, Bristol Myers Squibb has outlined specific standards and responsibilities concerning human rights in the following documents:

- The Bristol Myers Squibb Principles of Integrity¹⁴ 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.
- Our **Standards of Business Conduct and Ethics for Third Parties**¹⁵ sets the expectations that our suppliers and business partners will ensure responsible sourcing in their operations. Among other points, the Third Party Standards specifically forbid the use of forced or involuntary labor of any kind.
- Our **Anti-Slavery and Human Trafficking Statement**¹⁶ sets out steps Bristol Myers Squibb has taken to address and mitigate the risk of modern slavery and/or human trafficking in its supply chains or in any part of its business.
- Bristol Myers Squibb joined the **The United Nations Global Compact (UNGC)** in 2010 and submits an annual Communication on Progress (CoP)¹⁷. We support the UNGC's 10 principles on human rights, labor, environment, and anti-corruption. Our annual CoP outlines our ongoing efforts towards responsible business practices, including those in relation to human rights.
- Bristol Myers Squibb's **Environmental, Social, and Governance (ESG) Report**¹⁸ highlights our annual progress across our environmental, social, and governance commitments.

Risk Analysis

Bristol Myers Squibb supports fully the principles established under the UDHR, which addresses: the equality of all human beings; the right to life, liberty and security; personal freedom; and economic, social, and cultural freedoms. We strive to support and respect the protection of human rights and to avoid complicity in human rights abuses; to embrace a diverse and inclusive workforce; and to promote the health, safety and equitable and respectful treatment of our employees, without discrimination or harassment.

Bristol Myers Squibb has implemented a multi-level risk management system to ensure timely identification and analysis of potential violations of environmental and human rights standards in our own business area and supply chain. This system allows the identification of suppliers and products with increased risk and the implementation of targeted measures to ensure compliance with relevant regulations. We take our responsibility to protect the environment and human rights very seriously and carry out this analysis on an ad hoc basis, but at least once a year.

The goal of our risk analysis is to create the greatest possible transparency in our own business area and along our supply chain. Therefore, we take a comprehensive view at various levels and base our risk analysis on a variety of indicators, including country-specific characteristics in relation to environmental and human rights as well as specific risks associated with certain industries. The results of this analysis are then validated and confirmed by additional internally available information.

This process allows us to identify specific issues that are prioritized and addressed based on their potential impact and our ability to influence them.

Bristol Myers Squibb Business Area

Our commitment to our employees is reflected in our Principles of Integrity as well as our policies and procedures, which are designed to ensure the safety, well-being, and health of our employees.

Adherence to these requirements within our operations is managed by internal controls as well as internal and external assessments. Audits by internal and external experts are a key mechanism for independent performance monitoring. In support of our internal network and key external partners, we have global teams of experts who work across the business to embed our practices and ensure performance.

Bristol Myers Squibb Suppliers

Bristol Myers Squibb sets expectations that its suppliers and partners are operating with responsible practices in their operations, including respecting human rights and complying with the laws of the countries in which we do business. In our Standards of Business Conduct and Ethics for Third Parties, we outline these expectations, including, but not limited to, a commitment to fair labor practices, non-discrimination and anti-harassment, and maintaining a safe and healthy work environment.

Known violations of the Third Party Standards can result in further investigation, corrective actions, or in the most severe cases, result in termination of existing arrangements.

Training & Awareness

Regular training and awareness around Bristol Myers Squibb 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 Bristol Myers Squibb 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

Bristol Myers Squibb 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-hour/7-days a week via telephone- or web. The confidential reporting system is available in multiple languages.

The Bristol Myers Squibb-Integrity can be found at: bms.integrity.ethicspoint.com. Bristol Myers Squibb is committed to reviewing, and where appropriate investigating, all reports.

Report

We document our efforts to implement our due diligence obligations in detail and prepare an annual report in fulfillment of our due diligence obligations. We also publish the report on our website and make it available there for seven years.



Remo Gujer (General Manager)

Disclaimer: in the event of any inconsistency between the English and German versions of this declaration, the German text shall prevail.

¹ United Nations Guiding Principles on Business and Human Rights. https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

² The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. https://www.oecd-ilibrary.org/finance-and-investment/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en

³ Universal Declaration of Human Rights. <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

⁴ International Covenant on Civil and Political Rights. <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>

⁵ International Covenant on Economic, Social and Cultural Rights. <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights>

⁶ The International Labour Organization's (ILO) Core Labour Rights Conventions. <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm#:~:text=The%20ILO%20Governing%20Body%20had,of%20forced%20or%20compulsory%20labour>

⁷ International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. <https://www.ilo.org/declaration/lang--en/index.htm>

⁸ Standards of Business Conduct and Ethics for Third Parties. <https://www.bms.com/assets/bms/us/en-us/pdf/standards/English-3PStandards.pdf>

⁹ Anti-Slavery and Human Trafficking Statement. <https://www.bms.com/assets/bms/us/english-documents/our-principles/UK-CA-Slavery-Human-Trafficking-Statement.pdf>

¹⁰ Standards of Business Conduct and Ethics Third Parties-German (bms.com)

¹¹ BMS Principles of Integrity. <https://www.bms.com/assets/bms/us/en-us/pdf/principles-of-integrity.pdf>

¹² UN Global Compact. <https://www.unglobalcompact.org/>

¹³ Position statement on human rights - Bristol Myers Squibb (bms.com)

¹⁴ BMS Principles of Integrity. <https://www.bms.com/assets/bms/us/en-us/pdf/principles-of-integrity.pdf>

¹⁵ Standards of Business Conduct and Ethics for Third Parties. Standards of Business Conduct and Ethics Third Parties-German (bms.com)

¹⁶ Anti-Slavery and Human Trafficking Statement.

<https://www.bms.com/assets/bms/us/english-documents/our-principles/UK-CA-Slavery-Human-Trafficking-Statement.pdf>

¹⁷ UN Global Compact Communication on Progress 2022. <https://www.bms.com/about-us/sustainability/governance/ungc-communication-on-progress.html>

¹⁸ BMS ESG Report: BMS-ESG-Report-2023.pdf