

Anti-Slavery and Human Trafficking Statement for year ending December 2024

Purpose of Statement

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 the fiscal year ending December 31, 2024, 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 to Human Rights

BMS' commitment to combatting modern slavery and human trafficking is consistent with our values and is reflected across our operations, supply chains, and in our engagement with the communities we serve. We do not condone slavery or human trafficking of any kind and are committed to respecting human rights throughout our business and supply chain. 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 Labor Organization's (ILO) Core Labour Rights Conventions
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work

We are a signatory of the United Nations Global Compact, supporting its 10 principles on human rights, labor, environment, and anti-corruption, including eliminating forced labor.

BMS is part of 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 ethical practices among pharmaceutical suppliers. We are an active member of the Human Rights & Labor Committee and collaborate on the development and execution of supplier capability-building and training.

Since 2019, BMS has collaborated with Truckers Against Trafficking (TAT) to combat human trafficking. In 2024, BMS hosted TAT's Freedom Drivers Project (FDP) at the Healthcare Distribution Alliance's Cargo Security Coalition Meeting. This mobile exhibit educated audiences across the U.S. and Canada through survivor stories, real-life artifacts, and insights into the transportation industry's efforts to combat trafficking. We also leverage the TAT collaboration through engagement with our transportation suppliers on ways they can identify and prevent human trafficking.

We are committed to continually reviewing and evolving our human rights program by strengthening our policies, building greater efficiencies across the organization, and enhancing transparency. In 2024, our efforts were focused on bolstering policies and supplier contracts, education and training, and increased due diligence across the value chain. We also enhanced the governance of our Human Rights program with direct oversight by our Chief Compliance and Ethics Officer and the establishment of a new Human Rights Lead who will oversee the program.

In 2024, we also evolved our human rights program by:

- Driving operational enhancements to provide greater visibility of our value chain and evolving our governance framework
- Improving monitoring and engagement, and advancing supplier obligations
- Establishing new supplier risk assessment and mitigation models to include third-party monitoring, remediation/corrective actions, and escalation processes

BMS' Positions, Standards and Disclosures

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



BMS' Global Position Statement on Human Rights details our core human rights commitment, governance, and principles. It emphasizes the standards and responsibilities regarding anti-trafficking, modern slavery, and human rights, including our ongoing human rights due diligence in our own operations and suppliers.



The **BMS Principles of Integrity (BMS Principles)** provide guidance on the ways in which we conduct business in a compliant and ethical manner. Updated in 2024, 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 BMS 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. The 3P Standards have been translated into 12 languages to support the global supplier base. Revised in 2024, our 3P Standards require suppliers to commit to uphold the following Human Rights-related principles:

- **Voluntary Employment:** BMS prohibits forced, bonded, enslaved, indentured or involuntary prison labor, or engagement in human trafficking.
- **Child Labor and Young Workers:** BMS 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:** BMS prohibits discrimination and harassment. 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:** BMS pays workers in compliance with applicable wage laws, including minimum wages, overtime hours, and mandated benefits.
- **Freedom of Association:** BMS 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



BMS' Building a Better Future Report highlights our annual progress across our environmental, social, and governance commitments.

Human Rights Due Diligence

BMS fully supports the principles established under the UDHR, which addresses and acknowledges: 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 across the value chain and to promote the health, safety and respectful treatment of our employees and our suppliers.

In 2024, BMS established a Human Rights Due Diligence (HRDD) Working Group to help develop and embed a more robust due diligence framework across our value chain. The group engaged with external experts to enhance the company's human rights program, developing operational tools and guidance to support our workforce and supply chain. The HRDD Working Group also enhanced our Supplier Code of Conduct, implemented a new supplier risk assessment and mitigation model, and established a supply chain governance framework. The team identified key risk areas

for the program, advanced supplier engagement through self-assessments and third-party validations, and initiated capacity-building efforts for the organization.

Supplier Expectations

As outlined in our Standards of Business Conduct and Ethics for Third Parties (3P Standards), 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. Our 3P Standards, which are part of our supplier qualification process, contain these expectations and include an Acknowledgment of Terms. We regularly review and communicate updates of our 3P Standards to our suppliers.

Supply Chain Verification

Supplier due diligence is a critical element in helping ensure that our suppliers and business partners are upholding the principles that we outline in our 3P Standards. We work hard to manage and monitor that our suppliers and partners are operating with responsible 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 our evolution to elevate expectations and benchmark existing practices of suppliers, BMS is continuing implementation of its Responsible Sourcing Program (RSP). This 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.

For select suppliers whose due diligence information is not available through third-party tools, BMS will require self-assessment information. We will conduct independent third-party assessments at a sampling of categories and geographies to validate our self-assessment process. For any issues identified through self-assessments or third-party assessments, BMS will work with suppliers to address them through corrective actions and remediation.

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

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

Reporting and Remediation

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, available 24/7 via telephone or web in multiple languages, can be accessed at bms.integrity.ethicspoint.com. If we learn of any allegations of slavery or human trafficking through the Helpline or any other means, BMS is committed to promptly investigating and acting to remediate the situation in a responsible manner.

BMS has a strict policy against retaliation. Reports can be made confidentially and anonymously, where local law permits, and without fear of reprisal.

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



Chris Boerner, PhD

Chief Executive Officer

May 2025

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