

Global Position Statement on Human Rights

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Introduction

Our mission at BMS “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 (BMS) 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.

We promote our employees' health, safety, and equitable and respectful treatment without discrimination or harassment as outlined in our Principles of Integrity.⁸ These Principles apply to all BMS employees, as well as contractors working on behalf of BMS. 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.⁹ For the last 10 years, we have submitted our annual Communication of Progress.

While Governments have the primary duty to fulfill the right to access healthcare, we understand our responsibility as a pharmaceutical company to make our products as accessible as possible around the world

while maintaining the sustainability of our business. We commit to supporting the Global Compact principles in all our business activities.

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.

BMS' Human Rights Global Position Statement (HRGPS) was jointly developed by the Sustainability & Social Impact and Ethics & Compliance teams, with core support from key functional areas. As part of BMS' Sustainability & Social Impact Governance and Operating model, the HRGPS was reviewed and approved by the BMS Sustainability & Social Impact Council, a cross-functional senior management committee led by the Vice President of Global Purpose and Patient Experience and includes leaders from Ethics & Compliance, Legal, Supplier Sourcing, Environment Health Safety & Sustainability, and Global Product Development & Supply.

Human Rights-related updates, including risks and opportunities, are included within the Sustainability & Social Impact Council updates to the CEO, the CEO's Leadership Team (the "BMSLT") the Board Committee on Directors & Corporate Governance, which occur regularly throughout the year, and where required by local regulations, to the local managing directors.

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

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

- The **BMS Principles of Integrity** provide guidance on how 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.¹⁰
- Our **Standards of Business Conduct and Ethics for Third Parties** set 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.¹¹
- Our **Anti-Slavery and Human Trafficking Statement** sets out steps BMS 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.¹²
- BMS joined the **United Nations Global Compact (UNGC)** in 2010 and submits an annual Communication on Progress (CoP).¹³ 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.
- **BMS' Impact (ESG) Report** highlights our annual progress across our environmental, social, and governance commitments.¹⁴

Transparency

We take a thoughtful approach to pricing our products and have internal processes and controls in place to ensure that pricing decisions are thoroughly and appropriately vetted with the highest levels of management prior to implementation. For example, the Compensation Management and Development Committee of the Board annually completes a thoughtful and rigorous evaluation of our executive compensation program to ensure that the program is aligned with our mission and delivers shareholder value, while not encouraging excessive or inappropriate risk taking by our executives.¹⁵

Human Rights Priorities

We have identified the following priorities for BMS to have the greatest positive impact on human rights. These were identified based on our ongoing human rights due diligence and internal and external stakeholder engagement:

- Right to Health
- Product Quality & Patient Safety
- Clinical Trials
- Environment
- Our Workforce
- Labor Rights

Right to Health

We believe that every person has a right to the highest attainable standard of mental and physical health, as articulated in the International Covenant on Economic, Social, and Cultural Rights (ICESCR). The human right to health is recognized in Article 12.1 of ICESCR and defined as “the right of everyone to the enjoyment of the highest attainable standard of physical and mental health.”¹⁶

BMS advocates for increased access to health care throughout the world. We partner with governments, international agencies, nongovernmental organizations, and other stakeholders to help reduce health disparities by strengthening community-based healthcare support services and through our patient assistance and educational offerings. In addition, the BMS Foundation, a separate, independent charitable organization, has been focused on promoting health equity and improving the health of marginalized communities burdened by serious diseases for nearly 25 years.

We believe in long-term sustainable global solutions to address health inequities, and we are developing new pathways and models to expand access to patients in low- and middle-income countries. BMS has embedded access as a core tenet across our business and is committed to having a global access strategy for 100% of our product pipeline.

We aspire for all patients who need them to reach our treatments, regardless of income, by developing tailored programs to help expand access to our innovative medicines. Our approach ranges from public and private reimbursement which reflects the value of our innovative medicines, copay assistance to reduce patient out-of-pocket burden, and for low and middle-income countries (LMICs), we account for affordability using, where appropriate, some of our existing pricing approaches, including specific not-for-profit pricing and adjusted pricing based on gross national income per capita, while also enabling medical centers of excellence to gain access to our specialty care products.

Additionally, we drive healthcare strengthening efforts and collaboration on global policy that deliver sustainable impact adapted specifically to local needs. Our geographic reach continues to expand across countries through a global health equity lens enabling access to those who are affected by diseases.

BMS believes everyone should have access to quality, affordable healthcare services they need. We support Universal Health Coverage (UHC) for improved patient access to medicines. We are fully committed to realizing the goal of UHC via a thoughtful transition that meets the shared goals of industry, governments and others to expand patient access to medicines and services while preserving incentives for future innovation and sustainability. The innovative biopharmaceutical industry (including associations such as EFPIA, IFPMA, JPMA, and PhRMA) has also established and endorsed policy principles on UHC.¹⁷

Product Quality & Patient Safety

Global supply chains are essential to preventing interruptions in the manufacturing of medicines. We are committed to ensuring the quality, safety, and integrity of our products, and work closely with our supply chain partners to ensure that our products are appropriately labeled, packaged, stored, and handled.

We protect the entire life cycle of our products with a transparent approach that provides consumers and distributors with the information they need to ensure the safe use, transportation, storage and disposal of our products. BMS performs regular risk assessments to determine the gaps in current internal processes so that new processes can be developed and implemented.

Counterfeit drugs, theft, and diversion represent serious threats to patients and can interfere with our ability to provide customers with effective and high-quality products. We support the World Health Organization's (WHO) position that fighting against counterfeit drugs should be a focus area to combat the challenge of expanding access to medicines globally. We participate in industry coalitions addressing counterfeiting and collaboration with law enforcement agencies, supply chain vendors and organizations on product security matters.

Clinical Trials

Patient welfare is our top priority, including the safety of clinical trial participants. We are committed to conducting our research activities and clinical trials consistent with ethical principles that have their origin in the World Medical Association Declaration of Helsinki, Good Clinical Practice, and the International Ethical Guidelines for Biomedical Research Involving Human Subjects. This is in accordance with our bioethics policy.¹⁸

BMS conducts trials in countries where the potentially approved research can benefit the host country and its population. Every clinical trial must be approved by national and/or regional regulatory authorities and independent local ethics committees or institutional review boards in the countries where the trial takes place. When patients benefit from a clinical trial, where appropriate, we work to ensure that patients continue to receive the treatment they need consistent with all local regulation.

Use of biological materials and technologies must be lawful, reasonable, consensual, and ethical to ensure the safety and welfare of research subjects, BMS employees, the environment, and the communities in which we operate.

We recognize the importance of enrolling clinical trial populations that are more reflective of broader patient populations and aligned with the epidemiology of the diseases we study. In doing so, we can better address barriers to health equity and deepen our clinicians' understanding of the safety and efficacy of investigational medicines for all people.

By adhering to local, regional, and national requirements for clinical trial disclosure, we are committed to publicly sharing information on the clinical trials we conduct, regardless of the outcome, as described in our clinical trial disclosure.¹⁹ BMS supports the principles of enhanced transparency and clinical trial data sharing with researchers, clinical trial participants, regulators and patient advocates and reports publicly on clinical trial outcomes.²⁰

Environment

We are regularly adapting our business model to ensure we are best positioned to address climate and environmental issues. We have designed and put in place environmental goals that not only reflect our science-led, innovation-focused approach but ensure accountability to those we serve through strong governance and transparent reporting practices.

We engage our people, suppliers, and partners to tackle the environmental issues that patients, health providers, caregivers, and other stakeholders care deeply about, such as climate change, sustainable packaging, and transportation. Together, we are galvanizing our efforts to reduce environmental impacts across our drug development lifecycle and supply chain.

Our Workforce

Among our highest priorities are the health, safety, professional development, and wellbeing of our employees. We prioritize our people by cultivating a high-performing and inclusive global workforce. We unite as ONE BMS, believing that the varied experiences and perspectives of all our employees help to bring out our best ideas, drive innovation and achieve transformative business results. We remain committed to providing a comprehensive rewards and wellbeing strategy to enable our workforce to deliver on our business strategy and transform patients' lives through science.

Labor Rights

We are committed to respecting human rights in our operations and across our value chain and complying with the laws of the countries in which we do business. This includes but is not limited to, a commitment to fair labor practices, non-discrimination and anti-harassment, and maintaining a safe and healthy work 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 BMS Standards of Business Conduct and Ethics for Third Parties.²¹ This commitment includes upholding the following:

- *Voluntary Employment:* BMS prohibits forced, bonded, enslaved, indentured or involuntary prison labor, or engagement in human trafficking.²²
- *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. 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:* 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.

Human Rights Due Diligence

BMS 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 across the value chain; to embrace an inclusive workforce; and to promote the health, safety and equitable and respectful treatment of our employees, without discrimination or harassment.

BMS Operations

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.

BMS Suppliers

BMS sets expectations in our Standards of Business Conduct and Ethics for Third Parties (3P Standards) 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. We work hard to manage and monitor that our suppliers and partners are operating with responsible sourcing practices in their operations.

In addition to our 3P Standards, BMS established its Responsible Sourcing Program (RSP). The 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.

As part of RSP, BMS will leverage tools to prioritize supplier engagement and assessment, with risk being a key factor. Improvements to address risk will follow the RSP Guidance Model, which outlines a road for improvement and is centered around a risk-based approach. Suppliers identified to have higher risk revealed through the RSP may have more due diligence or follow up required.

Training & Awareness

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 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 BMS 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

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 is available 24-hour/7-days a week via telephone- or web. The confidential reporting system is available in multiple languages.

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

The BMS Integrity Line can be found at: bms.integrity.ethicspoint.com. BMS is committed to reviewing, and where appropriate investigating, all reports.

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 BMS Principles of Integrity. http://insite.bms.com/oce/SBCE_2014/Documents/PRINCIPLES%20-%202014%20SBCE%20%20English.pdf

⁹ UN Global Compact. <https://www.unglobalcompact.org/>

¹⁰ BMS Principles of Integrity. http://insite.bms.com/oce/SBCE_2014/Documents/PRINCIPLES%20-%202014%20SBCE%20%20English.pdf

¹¹ Standards of Business Conduct and Ethics for Third Parties. <https://www.bms.com/assets/bms/us/en-us/pdf/standards/English-3PStandards.pdf>

¹² Anti-Slavery and Human Trafficking Statement.

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

¹³ UN Global Compact Communication on Progress 2022. <https://www.bms.com/about-us/sustainability/governance/ungc-communication-on-progress.html>

¹⁴ BMS ESG Report. <https://www.bms.com/assets/bms/us/en-us/pdf/bmy-2022-esg-report.pdf>

¹⁵ BMS 2023 Proxy Statement, section Responsible Drug Pricing Strategy & Transparency. <https://annual-report.bms.com/assets/bms-ar/documents/bms-2023-definitive-proxy-statement.pdf>

¹⁶ International Covenant on Economic, Social and Cultural Rights. <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights>

¹⁷ IFPMA. http://www.ifpma.org/fileadmin/content/Publication/2014/EFPIA_IFPMA_JPMA_PhRMA_Perspectives_on_UHC_March2014.pdf

¹⁸ BMS Bioethics Policy. <https://www.bms.com/about-us/responsibility/position-on-key-issues/bioethics-policy-statement.html>

¹⁹ BMS Clinical Trial Disclosure Commitment. <https://www.bms.com/researchers-and-partners/clinical-trials-and-research/disclosure-commitment.html>

²⁰ BMS Clinical Trials and Research. <https://www.bms.com/researchers-and-partners/clinical-trials-and-research.html>

²¹ Standards of Business Conduct and Ethics for Third Parties. <https://www.bms.com/assets/bms/us/en-us/pdf/standards/English-3PStandards.pdf>

²² Anti-Slavery and Human Trafficking Statement. <https://www.bms.com/assets/bms/us/english-documents/our-principles/UK-CA-Slavery-Human-Trafficking-Statement.pdf>