

Human Rights Global Position Statement

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Introduction

At Bristol Myers Squibb (BMS) our mission - to discover, develop and deliver innovative medicines that help patients prevail over serious diseases - guides our approach to respecting human rights across our operations and value chain. 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.

We refine this statement through due diligence and engagement with internal and external stakeholders, peers, experts, and shareholders.

Our Commitment to Human Rights

BMS' 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

As a signatory of the United Nations Global Compact (UNGC), we support the 10 principles on human rights, labor, environment, and anti-corruption.⁸

We promote our employees' health, safety, and respectful treatment without discrimination or harassment as outlined in our **Principles of Integrity**. 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.

BMS continuously enhances its Human Rights Program by incorporating updated guidance and compliance requirements, integrating lessons learned from assessments, stakeholder feedback, and regulatory developments. These insights may inform updates to work instructions, policies, training, and due diligence practices.

Governance

We are committed to uncompromising quality, integrity, and ethics in everything we do. We maintain effective policies, leadership oversight, and internal procedures that continue to strengthen our Human Rights Program at BMS.

The Human Rights Global Position Statement (HRGPS) was jointly developed by the Sustainability and Social Impact (SSI), Strategic Risk Management (SRM), and Global Procurement teams, with support from key functional areas. It was reviewed by a cross-functional senior management committee, led by the Vice President of Global Purpose and Patient Experience and included leaders from Law & Policy, Global Procurement, Environmental Health Safety & Sustainability, and Product Development & Supply.

Our Global Human Rights Program is facilitated by the SRM team, with strategic and operational support by Global Procurement, SSI, Law & Policy, People Team, and other relevant functions. Our governance structure enables consistent oversight, early identification and assessment of risks, and timely action. As appropriate, human rights-related updates, including risks and opportunities, are included in updates to the BMS Leadership Team, the Board of Directors and relevant Board committees, and, where required, local managing directors.

In addition to our HRGPS, BMS outlines 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, and form the basis for our interactions with employees, patients, customers, shareholders, and the global community.
- Our **Standards of Business Conduct and Ethics for Third Parties (3P Standards)** set expectations that our suppliers and business partners will ensure responsible sourcing in their operations and, among other points, specifically forbids the use of forced or involuntary labor of any kind.
- Our **Modern Slavery Statement** outlines steps BMS has taken to address and mitigate the risk of modern slavery in our global value chain.
- BMS' **Impact Report: Building a Better Future** highlights our annual progress across our environmental, social, and governance commitments.

Transparency

We publicly disclose our approach, priorities, and progress through our HRGPS, **Modern Slavery Statement**, and relevant sections of the **Impact Report**. In addition, we publish clear positions on a range of issues important to patients, healthcare systems, and society on our **Position on Key Issues** webpage.

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
- Workforce & Labor Rights

Right to Health

We believe every person has the right to the highest attainable standard of mental and physical health, as articulated in the ICESCR.⁵ While governments hold primary responsibility for fulfilling the right to health, BMS works to expand access to our medicines and innovations by building effective access pathways, developing new delivery models, and maintaining price transparency.

Our approach centers on key strategic levers designed to enable greater access, including:

1. **Advancing Health Equity:** All people should have an equitable opportunity to benefit from our medicines and innovation, no matter who they are, where they live or what they have. We aim to drive meaningful progress around inclusive research and equitable access to care by integrating health equity into core business operations; engaging, amplifying, and collaborating with communities as essential partners; cultivating multi-sector partnerships that expand our reach and impact; and working to identify gaps and scale solutions across populations. Please see the *Clinical Trials* section for more information on inclusive research.
2. **Ensuring Access & Affordability:** BMS integrates access strategies early in product development and tailors them to local market needs. BMS develops scalable, country-specific pathways for new therapies, considering local regulations, affordability, and distribution, so patients can benefit regardless of geography or income. BMS also considers affordability and the overall budget impact of our medicine in the context of the local setting when developing prices. For more, read our **Global access and pricing position statement**.
3. **Enhancing Health Literacy:** Health literacy isn't just a communications issue; it's a public health imperative. To support patient autonomy and health literacy, our **Universal Patient Language (UPL) program** simplifies medical information using foundational principles applied across patient, caregiver, and general public materials in clinical development as well as throughout the drug development spectrum. UPL advances more transparent, empathetic and empowering health communication by removing barriers to patient and caregiver understanding, trust, and action. For more, please visit [UPL.org](https://www.bms.com/health-equity/health-literacy).
4. **Stakeholder Collaboration & Engagement:** We engage patients, caregivers, healthcare professionals, civil society, and policymakers to help shape access solutions that reflect real-world needs. Through partnerships with governments, NGOs, and health-system actors, we work to strengthen clinical capability, expand clinical trial participation, partner on training, and co-develop community-based initiatives that build local capacity.
5. **Accountability & Transparency:** We communicate transparently on our access approach and the governance mechanisms that guide it. We assess performance against our objectives, disclose progress through platforms such as our Impact Report, and publish position statements outlining our commitments related to access, pricing, and health equity.

BMS is committed to fostering innovation while ensuring patients have access to the medicines they need. We contingentlyⁱ support the WTO Doha Declaration on Trade-Related Aspects of Intellectual Property Rights (TRIPS Agreement) and Public Health, which upholds the right of countries to safeguard public health and recognizes the essential role of intellectual property in advancing new therapies. As a signatory to the Intellectual Property Principles for Advancing Cures and Therapies (IP PACT), we reaffirm our commitment to responsible IP stewardship that balances innovation with the needs of patients worldwide.⁹

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 integrity of our products throughout the entire lifecycle 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 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.

BMS' Patient Safety organization works globally to monitor the safety of all our medicines. Any adverse event that might be linked to a BMS product is thoroughly evaluated in the context of all available data. We additionally collaborate with health authorities from around the world to help address inquiries and update product labeling as needed. The importance of patient safety can be found throughout the company. BMS employees and contractors who become aware of any potential adverse events are responsible for reporting to Patient Safety. Our staff receives training annually on what an adverse event is, how to identify one and the proper procedures for reporting. Please visit our **Patient safety website** for information and resources.

Clinical Trials

Patient welfare is our top priority, including the safety of clinical trial participants. BMS is committed to respecting and protecting human rights throughout the design, conduct, and oversight of clinical trials. Trials are conducted in accordance with our **Bioethics policy** and internationally recognized standards for human subject research, including Good Clinical Practice

ⁱ In the event of a government-declared public health emergency.

and the World Medical Association Declaration of Helsinki. These standards guide clinical trial planning, execution, and oversight to safeguard the rights, safety, dignity, and well-being of participants.

BMS selects clinical trial locations based on scientific feasibility, regulatory and ethical standards, and opportunities to reach diverse patient populations, ensuring research generates high-quality evidence relevant across geographies and communities. All clinical trials are approved by applicable regulatory authorities and independent local ethics committees or institutional review boards in the countries where they are conducted. When patients benefit from participation in a clinical trial, and where appropriate, we work to support continued access to treatment in accordance with local regulations. Clinical trial oversight follows a risk-based approach to identify, monitor, and mitigate risks to participant rights, safety, and data integrity, supported by quality systems and escalation pathways.

We recognize the importance of enrolling clinical trial participants who reflect broader patient communities and align with disease epidemiology to help address barriers to health equity and strengthen understanding of the safety and efficacy of investigational medicines for all people. To support inclusive research and access, we reduce barriers to participation by expanding geographic reach, engaging communities to build awareness and trust in clinical research, addressing eligibility barriers, mitigating site and patient burden, and capturing data to support accountability and transparency.

Participant rights are protected through robust informed consent processes that provide clear, understandable information about the research, potential risks and benefits, and avenues for questions or concerns. BMS applies a systematic approach to identifying and protecting vulnerable clinical trial participants through governance, bioethics standards, and collaboration with external organizations. Consistent with our **Disclosure commitment**, we publicly disclose clinical trial information regardless of outcome and support responsible data sharing in line with applicable requirements.

BMS frequently conducts clinical trials with the support of third-party partners, including contract research organizations. These partners are expected to comply with BMS policies, ethical standards, and applicable laws and regulations. BMS maintains accountability for trial conduct through defined governance structures, qualification and onboarding processes, ongoing oversight, and audit activities, reinforcing respect for human rights through continuous improvement.

Environment

At BMS, we recognize the intrinsic connection between human health and environmental well-being and acknowledge our obligation to limit the environmental impact of our operations while ensuring continued access to our medications for patients. Our science-driven, innovation-oriented strategy directs our pursuit of tangible solutions to reduce our environmental footprint and adapt to the adverse effects of environmental degradation and climate change.

We have defined environmental objectives that reflect our commitment to science-based innovation, supported by robust governance frameworks and transparent reporting mechanisms. Our environmental stewardship approach is integrated into our organizational governance, ensuring that environmental priorities are considered in business decision-making at both the Board and enterprise levels, thereby fostering accountability and action. We take a proactive approach to managing climate risks to protect both the communities and ecosystems connected to our patients, caregivers and operations. By doing so, we gain valuable insights that help us make more informed business choices.

Please review our **Environmental stewardship position statement** for more information on our ambitions, environmental governance, water stewardship, waste management, and other relevant topics.

Workforce & Labor Rights

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 take meaningful action to respect 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 through the **Principles of Integrity** and contractually with our third parties through the **3P Standards**. This commitment includes upholding the following:

- **Voluntary Employment:** BMS prohibits forced, bonded, enslaved, indentured or involuntary prison labor, or engagement in human trafficking.
- **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.
- **Child Labor and Young Workers:** BMS prohibits the use of child labor, and 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.
- **Non-Discrimination and Fair Treatment:** BMS prohibits discrimination and harassment. Discrimination for reasons such as gender, race, color, religion, national origin, age, 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 conducts ongoing human rights due diligence across our operations and value chain through a combination of policy implementation, assessments, supplier engagement, and escalation procedures. Additionally, we maintain internal standards and work instructions that outline various components of our Human Rights Program.

BMS Operations

We support the principles established under the UDHR, which address 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 create an inclusive work environment; and to promote the health, safety and equitable and respectful treatment of our employees, without discrimination or harassment.

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. Internal controls, audits, and expert assessments help ensure compliance and continuous improvement. Human rights risk identification and mitigation efforts include ongoing monitoring, risk segmentation, strategic prioritization, sampling and onsite assessments based on geographic and business operational risk. In coordination with other segments of BMS' business, such as Environmental Health and Safety and Quality, any human rights risks discovered, will be remediated, monitored for improvement, and reported on accordingly.

Third Parties

Third-party due diligence is a critical element of our approach to ensure that suppliers and business partners are upholding the principles outlined in our **3P Standards**, including respecting human rights and complying with the laws of the countries in which we do business. BMS expects suppliers to not engage with, directly or indirectly, individuals or entities identified on any sanctioned or restricted parties list. We work to manage and monitor that our suppliers and partners are operating with responsible sourcing practices in their operations.

BMS leverages a Third Party Risk Management (TPRM) program to vet all new suppliers for inherent risk, with human rights incorporated as a defined risk domain. Through this process, suppliers that meet designated geographic or purchasing category risk thresholds are required to complete a human rights due diligence questionnaire, which must be reviewed and approved prior to the start of business. In conjunction with TPRM, our Responsible Sourcing Program (RSP)

evaluates supplier risk and performance across labor and human rights, environmental, ethical, and sustainable procurement topics using a third party tool.

Through RSP, we apply a risk-based approach to prioritize supplier engagement and assessment. Suppliers identified as higher risk through key factors such as category and geographic risk, or results from the TPRM process, may be subject to enhanced due diligence or follow-up, including third-party assessment, as guided by the RSP Guidance Model. For any issues identified through assessments or other avenues, BMS will work with suppliers on corrective action and remediation.

Training & Awareness

Regular training and awareness around BMS policies and procedures is an essential element to ensure that our employees, contractors, and Third Parties are upholding the values and principles that we set forth. As part of our Human Rights Program, we continuously evaluate our available training to evolve our content and coverage.

We require all our employees to know and to adhere to our **Principles of Integrity**. Employees also have access to voluntary training opportunities to reinforce ongoing awareness and compliance. Please see our **Impact Report: Building a Better Future** for additional information about employee training.

Contractors, consultants, vendors, and any individuals who do business with BMS are expected to comply with the **3P Standards**, and BMS may share relevant policy and training materials as appropriate.

Reporting Potential Violations

The BMS Integrity Line is a reporting system available in multiple languages and open 24 hours a day, 7 days a week. Accessible via telephone or web, the Integrity Line is a reporting channel for employees and external parties to raise concerns related to potential violations of our policies, principles, and standards, as well as other ethical and legal violations.

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/topics-and-sectors/fundamental-principles-and-rights-work>

⁸ UN Global Compact. <https://www.unglobalcompact.org>

⁹ IP Pact. <https://www.interpat.org/ip-pact/>