



Joint Modern Slavery Statement for year ending December 2025

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1. Introduction and Purpose of Statement

This statement addresses Australia's Modern Slavery Act (2018), California Transparency in Supply Chains Act (2010), Canada's Fighting Against Forced Labor and Child Labor in Supply Chains Act (2023), and the United Kingdom's Modern Slavery Act (2015) on issues of slavery, 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, 2025, to identify, address, and mitigate modern slavery risks across our operations and supply chain.

This is a joint Statement made on behalf of Bristol Myers Squibb Company (parent) and the BMS entities listed in Appendix I. Unless expressly stated otherwise, references to 'BMS', 'we', and 'our' refer collectively to BMS global operations, including the reporting entities listed in Appendix I and their owned and controlled entities. A table cross-referencing legislative criteria is provided in Appendix II.

2. Business Structure, Operations, and Supply Chain

Structure and Operations

BMS is a multinational biopharmaceutical company whose mission is to discover, develop, and deliver innovative medicines that help patients prevail over serious diseases. BMS is headquartered in the United States with about 32,500 employees in 43 countries spanning research and development, manufacturing, commercialization, medical, distribution, and corporate functions.¹

Supply Chain Overview

BMS partners with a broad network of suppliers, research collaborators, logistics providers, and distributors who collectively support our ability to deliver innovative medicines to patients around the world. We prioritize quality, resilience, and responsible business conduct across all third-party relationships.

The foundation of compliance is ensuring contractually all third parties comply with applicable laws and regulations as well as BMS' own standards, including our **Standards of Business Conduct and Ethics for Third Parties**, **BMS Principles of Integrity**, and **Human Rights Global Position Statement**. These frameworks outline clear expectations related to product quality, ethical business conduct, environmental sustainability, labor rights, and the prohibition of forced labor, child labor, and human trafficking. In Australia, Canada, and the United Kingdom, we procure a range of goods and services to support our business activities which are governed by the same global policies and procedures outlined in this Statement.

3. Positions, Standards, and Disclosures

BMS has global standards and responsibilities concerning anti-trafficking, modern slavery, and human rights, which apply across our global value chain. These expectations are anchored in the following documents:

- **BMS' Human Rights Global Position Statement (HRGPS)**, which defines our commitment to respecting human rights and our priority areas, aligns our approach with the United Nations Guiding Principles on Business and Human Rights, Organization for Economic Co-operation and Development Guidelines, International Labor Organization Core Labor Rights Conventions and Declaration on Fundamental Principles and Rights at Work, and the International Bill of Human Rights.

¹ Data as of December 31, 2025

- The **BMS Principles of Integrity (BMS Principles)** 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 commit to uphold the following human rights-related principles, including but not limited to: freely chosen employment; no child labor; non-discrimination and fair treatment; no forced labor and human trafficking; wages, benefits, and working hours; and freedom of association and collective bargaining. These expectations are reinforced through contractual provisions and other formal mechanisms with suppliers and business partners across our value chain.
- **BMS' Impact Report: Building a Better Future** highlights our annual progress across our environmental, social, and governance commitments.

Additionally, BMS maintains internal standards and work instructions that outline and operationalize the due diligence components of our Human Rights Program and support compliance with global regulations and standards.

4. Governance

BMS is committed to uncompromising quality, integrity, compliance, and ethics in everything we do. Human rights, including modern slavery, forced labor, and child labor risks, are managed through our global Human Rights Program and embedded into our broader risk management processes. As we work to transform patients' lives through science, we operate with effective governance and the highest ethical standards to deliver our mission.

Our HRGPS outlines our human rights priority topics and establishes governance and oversight of modern slavery risks across the value chain. We continuously review policies and procedures as our human rights actions, risk insights, and programs develop, to ensure ongoing alignment with our commitments.

Our governance structure provides consistent oversight of human rights-related topics, enabling early identification and assessment of risks and ensuring that appropriate actions are taken to address them. Human-rights-related risks, opportunities, and program updates are included in the Sustainability & Social Impact Council agenda, with appropriate updates provided to the BMS Leadership Team, the Board of Directors and relevant Board committees. In 2025, there were 2 communications in which human rights topics were made visible to the Board of Directors or relevant committees - whether through direct engagement or submitted through updates.

5. Human Rights Due Diligence & Remediation

BMS conducts human rights due diligence across our operations and value chain through a combination of policy implementation, assessments, supplier engagement, and escalation procedures.

BMS Operations

BMS supports the principles established under the Universal Declaration of Human Rights, 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.

Our commitment to our employees is reflected in our BMS Principles 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. For Environmental Health, Safety, and Sustainability (EHSS), audits by internal and external experts are a key mechanism for providing assurance and ongoing performance monitoring. In support of our internal network and key external partners, we have global teams of EHSS experts who work across the business to embed our practices and ensure performance.

As part of our due diligence efforts, our assessment of company-operated sites is structured as a four-step process aimed at identifying and mitigating human rights risks within BMS operations:

- 1. Inherent Risk Segmentation:** Annually, BMS compiles a comprehensive inventory of active operational sites and assesses inherent human rights risks using country risk scores from a widely used ratings tool, the BMS Human Rights Risk Score, and a criticality-based asset approach.
- 2. Risk-Based Prioritization:** Sites are prioritized based on inherent risk, strategic considerations, and operational size, with alignment across EHSS, Security, Quality, and human rights due diligence tools to maximize impact.
- 3. Pilot Sampling & Site Assessment:** Representative sites are selected for on-site or virtual assessments, including internal and semi-annual reviews, with new sites assessed after one year to ensure consistent implementation.
- 4. Ongoing Monitoring:** The process includes quarterly meetings, continuous updates to the site inventory, semi-annual reassessments, and coordinated follow-up actions across BMS teams for identified risks.

In 2025, 100% of BMS' owned or leased operations underwent a desktop assessment of human rights risks based on the methodology outlined in Step 1 above. The results will be used to assess and prioritize engagement and monitoring, as needed.

Third Party Due Diligence

Third Party due diligence is a critical element of our approach to ensure that our 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 practices in their operations.

BMS leverages a Third Party Risk Management (TPRM) program to vet all new suppliers for inherent risk. Human Rights is an independent risk domain within the TPRM program to assess new suppliers and to perform due diligence on third parties that meet purchasing category and geographic risk criteria. In conjunction with TPRM, BMS' Responsible Sourcing Program (RSP) evaluates existing third party risk and performance for topics including human rights, environment, ethics and sustainable procurement using a sustainability ratings and performance tool.

In 2025, we developed and rolled out a Sustainable Procurement & Operations (SP&O) Policy, which reinforces the expectations set through the Responsible Sourcing Program. The SP&O Policy includes specific language related to the Third Party Human Rights Due Diligence Program and its requirements, and more clearly defines how BMS works with third parties through RSP to support supply chain due diligence. Implemented through a phased approach, the SP&O Policy will continue to support transparent communication of supplier expectations, ways of working, and due diligence requirements.

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 self-assessments or third-party assessments, BMS will work with suppliers to address them through corrective actions and remediation.

BMS takes a risk-based approach to due diligence with a focus on prevention and mitigation, based on the likelihood of adverse impacts. In 2025, BMS conducted a review of the global value chain and developed the Third Party Human Rights Due Diligence Program framework to focus on key categories and geographies for a targeted due diligence strategy. A risk-based approach allows for a strategic process with focused allocation of resources to high-risk suppliers and ability to maximize impact while strengthening BMS' ability to drive improvement.

In addition to the due diligence described above, BMS is designing a third party human rights auditing program, focusing on those third parties that represent higher risk categories and/or geographies. The audit program will further inform the real risk present in the BMS supply chain and where future resources and attention should be focused on as the program matures.

Grievance Mechanism & Remediation

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. To the extent a Third Party becomes aware of any violation (actual or suspected) of the 3P Standards by parties within its own direct operations or in its supply chain, it shall immediately inform BMS through the Integrity Line.

If we learn of any allegations of modern slavery or human trafficking through this channel or any other means, BMS will promptly investigate and act 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.

6. Training

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. All employees are required to understand and adhere to the BMS Principles, including the human rights-related content contained therein, and is supported by regular training and recertification.

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, and vendors are expected to comply with the 3P Standards, and BMS may share relevant policy and training materials as appropriate.

We continue to evolve our training content and coverage as part of our Human Rights Program. In 2026, we intend to launch employee training focused specifically on human rights, including modules for those with responsibility for supply chain management.

7. Assessing Effectiveness & Continuous Improvement

Assessing the effectiveness of our approach to preventing modern slavery helps us understand and continually improve our global Human Rights Program. Across BMS, multiple groups—including the Human Rights Due Diligence Working Group, Strategic Risk Management, and Global Procurement—monitor program performance, identify gaps, and drive continuous improvement.

Key measures used to assess effectiveness can be found in the Appendix of our **Impact Report: Building a Better Future**, and include metrics related to Integrity Line usage, assessments, Principles of Integrity Policy training, and supplier engagement. For example, in 2025:

- 100% of BMS-owned or leased operations underwent a desktop assessment of human rights risks, based on country risk scores, the BMS Human Rights Risk score, and asset criticality.
- 55% of spend was associated with suppliers confirming acknowledgement to the BMS Sustainable Procurement & Operations Policy, which includes language around the Third Party Human Rights Due Diligence Program and its requirements.

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

This statement was approved by the Board of Directors of Bristol Myers Squibb, in its capacity as the parent company of Bristol-Myers Squibb Australia, Bristol Myers Squibb Canada Co., and Bristol-Myers Squibb Pharmaceuticals Limited (UK), on April 9, 2026.

Signed and dated by:



Christopher Boerner, PhD
Board Chair and Chief Executive Officer
April 9, 2026

8. Appendix

Appendix I: Market-level Information

Reporting Entities:

This Statement is made on behalf of Bristol Myers Squibb Company (*parent*) and the following Australian, Canadian and UK legal reporting entities.

| Legal Entity | Region |
|---|---------------------|
| Bristol-Myers Squibb Australia Pty Ltd (BMSA) | Australia |
| Bristol Myers Squibb Canada Co. | Canada |
| Bristol-Myers Squibb Pharmaceuticals Limited | United Kingdom (UK) |

Australia

This market-level information deals with BMSA and is specifically required under the Australian Modern Slavery Act (2018).

Structure, operations and supply chain:

Reporting entity Bristol-Myers Squibb Australia Pty Ltd, ABN 33 004 333 322 (BMSA), had approximately 246 employees on 31 December 2025, with over three quarters based at our Australian headquarters in Melbourne with the remainder operating remotely throughout Australia. BMSA has no subsidiaries and is not involved in the manufacture of product - information on BMS' worldwide manufacture facilities is available on the BMS website. Australian product is imported as fully finished product into a third-party logistics warehouse, DHL Supply Chain, which is part of the Deutsche Post DHL Group. DHL receives, stores, picks, packs and ships orders to Australian customers. DHL has publicly stated that it is similarly committed to eliminating modern slavery.

The Australian operations also include a clinical trials division that requires pharmaceutical product supply and patient management for phase 1, 2 and 3 trials, some of which involves the use of professional contracted staff who are remunerated appropriately. Other parts of the Australian business include Sales and Marketing, who promote BMS brands, a complementary Medical Team that educates and supports the business, Regulatory and Quality, who manage the registration, licensing and GxP ("good practice") of our company and products, and supporting services in finance, legal and compliance, strategy, HR, IT, etc.

Contracts for goods and services are entered into for the Australian business, including in respect to cleaning, maintenance, consultancy, recruitment, event/travel management, IT, marketing and other specialist consultancies. These are typically managed by the procurement teams based in various locations, including the UK, India and the US.

Risk of Modern Slavery in Australia's operations and supply chain

The overall risk of modern slavery is considered low for BMSA. This is due to the risk reduction activities undertaken within the BMS group discussed above but also more generally given:

- We have active, well-trained and robust HR, EHS, compliance, legal, procurement and other functions.
- Our employees generally are highly skilled and professional, hired on a regular full-time basis and not temporary, seasonal, unskilled or migrant workers.
- The sophisticated professional nature of many of our suppliers and the specialized nature of the goods and services being supplied.

- The complex nature of the pharmaceutical industry and pharmaceutical products, the source countries of products and services and the corporate social responsibility practices of the organizations involved.
- Whilst the Modern Slavery Index 2023 includes electronics as "at risk" products, BMSA has a bring your own mobile device policy and staff mainly use Lenovo laptops and screens; Lenovo similarly publicly state that they are committed to ethical corporate citizenship and outline the measures they take to fight slavery and human trafficking.

Reducing Modern Slavery Risks in Australia

While the risks of modern slavery are considered low, we continue to treat potential risks very seriously. Steps taken by BMSA to address this risk include:

- Intermittently distributing modern slavery questionnaires to relevant suppliers not already reporting on modern slavery, reviewing their responses for adequacy and providing feedback and suggestions where appropriate.
- Engaging directly with contracted staff in our cleaning and security teams to ensure workers are treated fairly, and to ensure there are no signs of exploitation, forced labor or other dubious practices.
- Responding to modern slavery questionnaires from our main customers which have been comprehensively responded to and accepted unreservedly by such customers.
- Incorporating modern slavery clauses into relevant template contracts.
- As mentioned in more detail above, rolling out BMS' global Principles of Integrity, requiring relevant vendors certify compliance with our global Standards of Business Conduct and Ethics for Third Parties (3P Standards), and notifying vendors of our Human Rights Global Position Statement which sets forth our commitment to support the UN principles on human rights, labor, environment and anti-corruption in all business activities, and encouraging them to also support these principles.

Assessing the effectiveness of our actions:

To assess the effectiveness of our actions:

- an Australian senior management group from various key functions dedicated to working on modern slavery meets quarterly to review developments in this area, action taken to address modern slavery and the associated reporting requirements,
- due consideration is given to relevant concerns raised via the Integrity Line or by any other means, including tracking to completion agreed actions to address any concerns, and
- media monitoring of modern slavery requirements to maintain up-to-date knowledge of industry-related initiatives, policies and occurrences of breaches, and to inform the assessment of our actions, as well as the development of future initiatives and means of assessment.

These measures are reinforced at a global level by supplier vetting and various assessments measures, mentioned previously above.

Consultation with reporting entities:

This Statement was prepared by BMSA in consultation with the Global Human Rights Working Group, Legal, Procurement, and Compliance & Ethics. Consultation involved sharing information on human rights topics—including modern slavery compliance activities, due diligence updates, and operational risks—to ensure the Statement accurately reflects the actions taken across BMS' Australian operations and the BMS supply chain (noting BMSA does not control or own any entities).

Approval:

This statement was approved by the Board of Directors of Bristol Myers Squibb, in its capacity as the parent company of Bristol-Myers Squibb Australia, on April 9, 2026. It was signed by Dr. Christopher Boerner, Chair of the Board and Chief Executive Officer, as a director of the Board.

Canada

Structure and operations:

Reporting entity Bristol Myers Squibb Canada Co. is a Nova Scotia unlimited liability corporation and is a wholly owned subsidiary of Bristol Myers Squibb Company. In accordance with its Health Canada-issued Drug Establishment License, BMS Canada imports BMS' medicines into Canada and sells them to its customers which include hospitals, pharmacies, government agencies, and wholesale pharmaceutical distributors.

BMS Canada also imports products to be used in clinical trials. BMS Canada conducts and supports Phase III clinical trials across Canada according to globally established protocols. In addition to importation, sales and distribution, BMS Canada employs various commercial teams who are responsible for promoting BMS medicines in accordance with their Health Canada-approved product monographs. BMS Canada also employs a medical team who is responsible for, among other things, supporting clinical research in Canada and delivering medical education to Canadian health care professionals. BMS Canada does not conduct any manufacturing activities in Canada.

Measures taken to remediate forced labor, child labor, and/or the loss of income:

BMS Canada has not identified any instances of forced labor or child labor in its business or supply chain. Because no instances of forced or child labor were identified, no income-loss remediation measures have been required.

This joint report has been approved by the governing body of Bristol-Myers Squibb Company, which controls each entity included in this report, in accordance with subsection 11(4)(b)(ii) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Appendix II: Reporting Table

| Australian MSA – Mandatory Reporting Criteria | Canadian MSA – Mandatory Reporting Criteria | UK MSA – Recommended Reporting Criteria | California MSA – Mandatory Reporting Criteria | Reference in this Statement |
|--|---|--|---|---|
| Identify the reporting entity | N/A | N/A | N/A | Section 1; Appendix I |
| Describe the reporting entity's structure, operations, and supply chains. | Describe the organization's structures, activities, and supply chains. | Organization's structure, its business, and its supply chains. | N/A | Section 2; Appendix I |
| Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls. | Describe the parts of its business and supply chains that carry a risk of forced labor or child labor being used and the steps it has taken to assess and manage that risk. | Describe the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk. | Disclose to what extent, if any, it engages in verification of product supply chains. | Section 4; Section 5; Section 7; Appendix I |

| | | | | |
|--|--|---|--|----------------------------------|
| Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes | Describe the organization's policies and its due diligence processes in relation to forced labor and child labor | Describe its policies in relation to slavery and human trafficking; due diligence processes in relation to slavery and human trafficking in its business and supply chains. | Disclose to what extent, if any, it conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains; requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. | Section 3; Section 5; Appendix I |
| Describe how the reporting entity assesses the effectiveness of such actions. | Describe how the entity assesses its effectiveness in ensuring that forced labor and child labor are not being used in its business and supply chains. | Describe its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate. | | Section 7; Appendix I |
| Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement. | N/A | N/A | N/A | Appendix I |

| | | | | |
|---|---|---|--|------------------------------|
| <p>Include any other information that the reporting entity, or the entity giving the statement, considers relevant.</p> | <p>Describe the training provided to employees on forced labor and child labor</p> | <p>Describe the training about slavery and human trafficking available to its staff</p> | <p>Disclose to what extent, if any it maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking; provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.</p> | <p>Section 4; Section 6</p> |
| | <p>Describe any measures taken to remediate any forced labor or child labor; any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chains</p> | | | <p>Section 5; Appendix I</p> |