

California Transparency in Supply Chains Act of 2010

Corporate Disclosure

The California Transparency in Supply Chains Act of 2010 is a law in place governing companies that do business in California. The Act was designed to increase the amount of information made available by manufacturers and retailers regarding their efforts to address the issue of slavery and human trafficking, thereby allowing consumers to make better, more informed choices regarding the products they buy and the companies they choose to support.

Bristol-Myers Squibb is a strong supporter of human rights globally both in the workplace at our own facilities and in the external pharmaceutical supply chain. We do not condone slavery or human trafficking of any kind and are committed to reducing the risk with our suppliers.

Accountability Standards

Bristol-Myers Squibb has Standards of Business Conduct and Ethics in place that govern the actions of our company and employees. We have developed and disseminated the Standards of Business Conduct & Ethics for Third Parties “3P Standards,” which further define our approach in this area and provide guidance to our suppliers and business partners regarding responsible sourcing. The 3P Standards include an endorsement of the International Labor Organization and the Universal Declaration of Human Rights. Among other issues, the 3P Standards specifically forbid the use of forced or involuntary labor of any kind.

We maintain and require all our employees, as well as contractors, consultants, vendors and any individuals who do business with Bristol-Myers Squibb, to know and adhere to our high standards of business conduct and ethics. The following standards apply:

[2010 Standards of Business Conduct and Ethics](#)

[Our Standards of Business Conduct and Ethics for Third Parties](#)

Supplier Certification

The 3P Standards include an Acknowledgment of Terms that requires, among other things, that the supplier identify the following: the individual responsible for the supplier’s compliance, the procedures in place to meet the 3P Standards, any discrepancies between the supplier’s operations and the 3P Standards, and any similar policy used by the supplier. The 3P Standards are part of Bristol-Myers Squibb’s supplier qualification process and all of the company’s suppliers are expected to agree to and abide by them.

Bristol-Myers Squibb’s contracts with suppliers require compliance with local laws and the 3P Standards. Local laws would include those regarding slavery and human trafficking of the country or countries where they are doing business. Contract signature by a supplier confirms agreement to adhere to our requirements and standards.

Supply Chain Verification

Bristol-Myers Squibb participates as a member of the Pharmaceutical Supply Chain Initiative (PSCI), which promotes Principles for Responsible Supply Chain Management among suppliers including human rights. Additional information on PSCI can be obtained [here](#).

Supplier Audits

Bristol-Myers Squibb conducts audits of its suppliers on a global basis in areas such as quality, environment, health, safety and finance. While the audits do not specifically cover compliance with company standards regarding slavery and human trafficking at the present time, our audit process is robust.

Training

On a worldwide basis, Bristol-Myers Squibb employees are trained on the Standards of Business Conduct and Ethics, the set of standards which govern employee actions. Our Chief Executive Officer has communicated on the 3P Standards to all managers and above, including employees with responsibility for supply chain management. The 3P Standards have been translated into 21 languages and are posted on the company web site.