



Bristol Myers Squibb is a participant of the [United Nations Global Compact](#), which is the world’s largest corporate citizenship and sustainability initiative.

To Our Stakeholders:

It is with great pride that I submit Bristol Myers Squibb’s eleventh annual Communication on Progress report.

We value the opportunity to tell our global compact story – to reaffirm our commitment to the Ten Principles of the United Nations Global Compact (UNGC) and to highlight the many ways we bring these principles to life through our people and our practices. The UNGC is closely aligned with our own longstanding company “Commitment” – a statement of company principles that places a premium on integrity, ethics, human rights, transparency, diversity and economic, social and environmental sustainability. Meeting these high standards is therefore part of our everyday business.

We are grateful for this opportunity and for the continued leadership and partnership of our UNGC colleagues.

Sincerely,

A handwritten signature in black ink that reads "Giovanni Caforio".

Giovanni Caforio, M.D.
Chairman of the Board & Chief Executive Officer

Introduction

Bristol Myers Squibb joined the U.N. Global Compact in December 2010 and this year we further integrated its principles encompassing Human Rights, Labor, Environment and Anti-Corruption across our company. Our commitment to the [U.N. Global Compact](#) is available to all employees and to the public on our company website. In this report, we provide an update on our efforts in support of the 4 pillars of the Global Compact: Human Rights, Labor, Environment, and Anti-Corruption.

Bristol Myers Squibb has established [Principles of Integrity and our Standards of Business Conduct and Ethics](#), which embody our high standards of ethical behavior and form the basis of our interactions with our employees, patients, customers, shareholders and the global community. Dr. Giovanni Caforio, Chairman and Chief Executive Officer of Bristol Myers Squibb holds the most senior position in the company with operational responsibility for all aspects of the business, including labor and human rights. Cari Gallman, Chief Compliance and Ethics Officer holds the most senior position within the company with operational responsibilities for compliance and ethics. She was appointed to the position in November 2021 upon the retirement of Adam Dubow, who assumed the role in 2018 after joining BMS in 1999.

Bristol Myers Squibb continues to be ranked on Corporate Responsibility magazine's annual list of the 100 Best Corporate Citizens, a leading index for socially responsible investors and other stakeholders. We are the only biopharmaceutical company to be included in the rankings every year since its inception in 2009. In 2021, Bristol Myers Squibb continued to collaborate with Business for Social Responsibility to support the Guiding Principles on Access to Healthcare, which include a principle on respecting human rights and we reported our progress towards the UN Sustainable Development Goals (UN SDGs) through their alignment with the [Global Reporting Index](#) (GRI), which can be found in our [2020 ESG Report](#).

This year, we continued our efforts to support the SDGs and the UN Global Compact as a participant in the [UN SDG Young Innovators Program](#) and the [Global Compact Action Platform 'Health is Everyone's Business'](#). Since 2018, Bristol Myers Squibb has supported the [U. N. Office of Human Rights Global LGBTI Standards for Business](#) and the [One Young World Lead 2030 Initiative](#), as the sponsor of the challenge for [U.N. SDG 10, Reduce Inequalities](#). In 2021, we [renewed our commitment](#) to support these programs, continuing our focus on advancing progress for SDG 10 targets.

In 2021, after successfully achieving our Sustainability 2020 Goals across the areas of patients, people, supply chain and the environment, we published our evolved environmental, social and governance (ESG) strategy that reflects our ambition to integrate sustainability across our global enterprise. Our ESG strategy seeks to mobilize our combined capabilities and resources to positively impact the communities where we live, work and serve, with four focus areas:

- We are committed to quality, integrity and ethics in everything we do.
- We seek to actively improve the health of the communities where we live work and serve.
- We value diversity and inclusion.
- We honor our longstanding pledge to environmental sustainability.

Our ESG strategy encompasses our [mission, vision, and values](#) and guides the integration of sustainability into our core business operations. It honors our pledge to keep patients at the center of everything we do, which is evidenced by the fact that BMS (inclusive of Celgene) has an exceptionally strong record in R&D, being recognized for the highest R&D investments as a share of revenue across all industries. In 2020, we invested \$11.1 billion in R&D.

In 2021, Bristol Myers Squibb continued its efforts to combat COVID-19 and mitigate the pandemic's impact on patients and families. In February 2021, BMS entered into an exclusive license agreement with The Rockefeller University to develop, manufacture and commercialize their novel monoclonal antibody (mAb) duo treatment that neutralizes the SARS-CoV-2 virus for therapy or prevention of COVID-19. Despite the increasing availability of vaccines, there will continue to be patients who contract COVID-19 and will need treatment for their infection. This novel treatment is a combination of two mAbs directed at blocking the SARS-CoV-2 spike protein and neutralizing the virus.

To address the humanitarian challenges brought on by the pandemic, Bristol Myers Squibb and the Bristol Myers Squibb Foundation, a 501(c)(3) organization, actively and separately contributed to relief efforts around the world. Together, Bristol Myers Squibb and the Bristol Myers Squibb Foundation have contributed more than \$31 million in financial support and needed products (e.g., PPE and medical equipment) to relief efforts in 45 countries.

The Bristol Myers Squibb Foundation has supported nearly 50 organizations in the U.S. and more than 150 organizations globally that care for patients and that support those on the frontlines of the COVID-19 response. In addition, it has contributed funding to support the work of more than 40 patient advocacy groups and professional societies. Also, to support research, education, and a wide range of efforts to benefit patients in need, Bristol Myers Squibb is engaging with more than 250 patient and professional organizations.

The global spread of COVID-19 continues to affect each of us and the communities in which we live in different ways. This is a challenging time for everyone, and many are searching for access to credible information and connection. Recognizing the urgency of the situation, including the growing gap between available resources and unmet needs, Bristol Myers Squibb and GRYT Health launched the COVID Advocacy Exchange, a virtual platform to unite advocacy organizations, patients and industry in the exchange of information. In 2021, the platform was renamed The Advocacy Exchange because, while the pandemic and its effects continue to be felt, we are moving into a new chapter where we have the opportunity to expand and enhance the Exchange to best serve the advocacy community's current and future needs. As such, we felt it was appropriate to remove the word "COVID" from the name of this platform to more accurately reflect the goal of this resource to support advocacy efforts broadly.

Also still being felt are the repercussions from the events in 2020 that highlighted the serious challenges facing the Black/African American community and the persistent health disparities that leave under-resourced communities at greater risk of poor health outcomes. Over the past year, teams across our organization have coalesced to dismantle some of the toughest challenges in our industry in diversity, inclusion and health equity. And while we don't have all the answers, we are making progress toward meeting the commitments announced last year. The [BMS commitments](#) to diversity and inclusion and health equity include:

- Accelerating efforts to reach at-risk patients with disease awareness and education programs and information about its patient support programs, including programs for people who cannot afford their medicines.
- Spending \$1 billion globally by 2025 with Black/African American and other diverse-owned businesses to help create jobs and generate positive economic impact in diverse communities.
- Expanding the diversity of its workforce and leadership to ensure it reflects the evolving demographics of the patients the company serves.
- Expanding the employee giving program to provide a 2-to-1 match for U.S. employee donations to organizations that fight health disparities and discrimination.

In 2021, \$11.1 million in Corporate Giving grants were awarded to 56 non-profit organizations across the United States. These grants will improve access to high-quality care and increase disease awareness and education for medically underserved communities. With our goal to spend \$1 billion with diverse suppliers around the world over the next 5 years, by Partnering with Purpose we will help expand capacity in diverse businesses, create jobs, lift communities, and drive supply chain innovation. We are on our way to meeting that goal while building trust and supplying change. Also, we announced a partnership with historically black colleges and universities to create and sustain a pipeline of diverse talent. We also released the [In This Together: Our Commitment to Global Diversity and Inclusion report](#), which highlights our transformative business model and goals for our people and culture.

Our teams are working tirelessly to increase diversity in clinical trials. In the near term, we will locate 25 percent of U.S. clinical trial research sites in highly diverse communities by 2022, which we believe will lead to better science and patient outcomes. We have a robust employee giving program, and the social unrest in the US inspired our [People and Business Resource Groups](#) (PBRGs) to identify social justice organizations fighting disparities and discrimination for a 2-to-1 match. To date, more than a thousand of our colleagues in the U.S. and Puerto Rico have donated, with participation growing.

Our strong emphasis on diversity and inclusion for our workforce has led to participation by over 12,500 employees in 44 countries across our eight PBRGs. These groups represent women, African-American, Latino/Hispanic, Asian-American, Millennial, differently-abled and lesbian/gay/bisexual/transgender (LGBT) employees, as well as those who are U.S. Veterans. In 2020, we expanded the PBRGs across the newly integrated network and leveraged technology to drive active virtual engagements to continue our support of veterans, STEM (Science, Technology, Engineering and Math) and drive new employee engagement efforts. These include the launch of programs designed to ensure employees are valued and respected for their authentic selves, and truly feel a sense of belonging.

Through the efforts of our PBRGs, we introduced a set of transgender guidelines in the U.S. and Canada to ensure a respectful and inclusive workplace environment for employees in the process of gender transition. All our [workplace policies](#) can be found on our website.

[BMS supports the TGNC community both internally and externally](#) in many ways, including by implementing Trans Inclusive Guidelines to help colleagues and teams navigate the transition process; including gender-affirming healthcare in our benefits offerings; actively recruiting trans and other LGBTQ individuals into our workforce; purchasing from LGBTQ-owned businesses; actively supporting the trans social justice movement including sponsorship of local and national organizations; and working with allied health organizations to combat health disparities experienced by the LGBTQ+ community. In 2020 we conducted a series of thought-provoking, engaging and inspiring virtual events under the theme Proud to Be Me in support of June Pride Month and strengthened our position through the publication of our [Statement on Recent Developments in the US Affecting the LGBTQ+ Community](#).

Our Global Procurement division actively seeks out, nurtures and supports a base of partners and suppliers that helps us drive our commitment to [Supplier Diversity](#) and has helped us build trusted, strategic relationships with businesses owned by minorities, women, veterans, LGBT, the disabled and other diverse populations. We have committed to spend \$1 billion globally by 2025 with Black/African American and other diverse-owned businesses to help create jobs and generate positive economic impact in diverse communities. Under a program called Procurement Risk Assessment and Mitigation (PRAM), we continue to increase our efforts to mitigate risk in our manufacturing suppliers by collecting information on Environment, Health and Safety (EHS), labor and ethics practices in addition to their ability to provide goods or services in the future. We have been able to assess >900 suppliers per year, including deeper dive evaluations of 140 enterprise-wide critical suppliers. In 2021, BMS began building upon PRAM to create a rigorous [Third-Party Risk Management \(TPRM\) process](#) which will provide a consistent approach to managing and monitoring risk with our suppliers. Our TPRM program aligns existing sourcing, contracting, due diligence, and ongoing monitoring practices and SOPs into a common methodology. The framework is being used to identify, assess, manage, and monitor risks arising from the use of third parties.

The company maintains both representation on the board and an overall leadership position within our membership in the [Pharmaceutical Supply Chain Initiative \(PSCI\)](#), which promotes Principles for Responsible Supply Chain Management among our suppliers and capacity building in developing countries. We annually revise and post our [Slavery and Human Trafficking Statement](#) addressing measures taken to tackle slavery and human trafficking, which are responsive to global legislation, including the United Kingdom's Modern Slavery Act of 2015 and the California Transparency in Supply Chains Act of 2010. In 2021, we published our first Modern Slavery Act statement in alignment with the [Australian Border Force](#). As trucking and human trafficking are a point of intersection, we continue our collaboration with [Truckers Against Trafficking](#), started in 2019, to help stop this atrocity. The intention of the training is for our partners to educate their drivers on how to identify Human Trafficking victims and how to alert authorities of suspected activity. As part of BMS's Social Responsibility and Corporate Sustainability commitments, we are asking our suppliers to commit to this important initiative and in 2020, we held our first formal event in collaboration with Truckers Against Trafficking and NJ Representative Christopher Smith (R) to recognize Human Trafficking Awareness Month and we recognized the US Anti-Human Trafficking Month in January 2021 through virtual engagement of our employees.

In 2021, the Bristol Myers Squibb Foundation continued its work to advance health equity focused on patients most at risk of suffering the impacts of serious diseases in the regions of the world that are hardest hit. The Foundation empowers partners to build innovative systemic solutions to improve access, quality, and outcomes for patients. It is addressing cancer, cardiovascular disease, and immunologic disease in the United States, and prevalent cancers in nine countries in Africa, Brazil and China.

In addition, the BMS Foundation began a significant program to address the lack of diversity in clinical trials in the U.S. in 2021. The five-year, \$100 million program, delivered by the BMS Foundation in partnership with National Medical Fellowships and the American Association for Cancer Research, will train 250 new clinical trial investigators who are racially and ethnically diverse or who have demonstrated commitment to increasing diversity in clinical trials. The Foundation's program also will expose 250 promising underrepresented minority medical students to clinical research career pathways. Increasing diversity of clinical trial investigators and future specialists helps increase diversity in patient enrollment in clinical trials. The goal of the Bristol Myers Squibb Foundation Diversity in Clinical Trials Career Development Program is to increase diversity of patients enrolled in clinical trials, and ultimately enhance the development of therapeutics for all populations. The Foundation and its program partners believe that

physicians who are established in their communities are well positioned to build trusting relationships with diverse patients that will lead to their increased participation in clinical trials. Therefore, the program will collaborate with communities to facilitate an approach to clinical and translational research that is community-informed, designed and conducted. It will provide the sponsorship, support, and tools that emerging investigators need to conduct clinical trials that will yield the development of new treatments that are studied in all populations.

Across the globe Bristol Myers Squibb is committed to being a responsible global citizen with respect to the environment. We met or exceeded all 19 targets within our Sustainability 2020 Goals, achieving a 20.7% decrease in total (absolute) GHG (2015 baseline) vs a target of 5% and a 10.8% decrease in total water use (2015 baseline) vs a target of 5%. Scope 3 emissions from business travel were reduced ~ 15%. At the end of 2020, we embarked on a journey toward achieving a set of ambitious [commitments towards environmental responsibility](#). We have committed to having approved Science Based Targets by 2024, 100% of our purchased electricity be from renewable sources by 2030, and by 2040, achieve, globally, 100% electric vehicles in our corporate fleet, net neutral carbon emissions, equitable water use, and zero waste to landfill.

We continue our [US Environmental Protection Agency \(EPA\) Treasure Hunt](#) program. The program has been rolled out across 14 facilities worldwide to identify opportunities to reduce energy and water consumption, minimize the generation of carbon emissions and waste. To date, just under 500 participants have identified hundreds of opportunities where were a focus of site efforts in 2021. The efforts in 2021 have further contributed to significant savings, with a current program ROI of >\$12 million. Through the opportunities already implemented, we have reduced greenhouse emissions by more than 20%, energy consumption by over 13% and water consumption by nearly 11%, with a total cost savings of >20%.

Bristol Myers Squibb received an Energy Star Partner of the Year Award in 2021, giving us seven consecutive years of recognition. For the fourth consecutive year, we earned the distinction of Sustained Partner Status from the U.S. Environmental Protection Agency (EPA) and U.S. Department of Energy (DOE) for our comprehensive policies and programs to manage energy use at our facilities worldwide. As members of the US Department of Energy Better Plants Challenge, we committed to reduce our Energy Intensity by 20% within 10 years. After the first five years, we have achieved a reduction of 15.23% and this year increased our commitment from the “Partner” level to the “Challenge” level. Also in 2021, our manufacturing facility in Humacao, Puerto Rico once again received the US EPA Energy Star Challenge for Industry.

In addition, we focused on our commitment to the Department of Energy Better Plants Waste Reduction pilot program, identifying opportunities across our network for a ‘green return to work’. We report our CO₂ emissions and water use through the Carbon Disclosure Project (CDP) and increased our effort to assess our carbon footprint from suppliers by participating in the Pharmaceutical Supply Chain Initiative (PSCI)-supported EcoDesk 3rd Party Survey in addition to the CDP Supply Chain Initiative survey. In 2021, we entered into a collaboration with EcoVadis and expanded our Responsible Sourcing Program, both of which will be launched in 2022. We expanded our partnership with CarbonFund.org, once again enabling a carbon emission-neutral Global Leadership Team meeting and offsetting >25% of the emissions from our 2021 global employee travel. Our annual contribution provides support of a Reduced Emissions from Deforestation and Degradation (REDD+) program in the Amazonian Basin.

In 2019, we opened our first zero-waste-to-landfill manufacturing site in [Cruiserath, Ireland](#). This state-of-the-art LEED Silver biologics manufacturing facility established a zero to landfill waste policy from

the very start of operations and developed an extensive waste management program to ensure the highest rate of reuse and recycling is achieved. The site continues to operate on 100% green energy, provides on-site inactivation of biohazardous waste, and has a modified wastewater treatment plant that removes >95% of carbon from the process water. In 2020, we received the [ISPE 'Facility of the Year' award for Project Execution](#) related to the design and implementation of this state-of-the-art facility. Our efforts to reduce waste apply across our manufacturing sites. Our Devens, MA site continues to re-route >14,500 lbs. of spent carbon from landfill to regeneration and reuse. We have extensive collaborations with key vendors to drive reforestation and recycling of wood, plastic and medical waste, described in our [2020 ESG Report](#). Our Princeton Pike facility in Princeton, NJ, USA holds a LEED Gold certification and in 2021 received its 4th consecutive EnergyStar® certification.

Since the inception of our Water Compass Project in 2017, we've completed systematic reviews of 13 key pharmaceutical manufacturing and R&D facilities in 6 countries worldwide for potential water and wastewater risks (including resource availability and impact). With >200 participants involved, we were able to document >60 model practices and identify >150 opportunities. In 2021 we initiated implementation of the roadmap designed in 2020 to expedite the implementation of prioritize opportunities as well as the review of manufacturing and R&D sites incorporated into our network through the acquisition of Celgene.

In 2021, BMS was the recipient of the US Environmental Protection Agency (EPA) Green Chemistry Challenge Award for Greener Reaction Conditions. BMS received the award in recognition for developing a new class of sustainable reagents that can be applied to a range of applications, including nucleotide chemistry, a growing area of drug development. The new reagent platform bypasses the traditional approach, reducing solvent and reagent use and improving the stability of the reagents and intermediates, making them safer to use. The innovation also eliminates the need for carbon footprint-intensive cold storage, required by the current approach.

BMS is actively engaged with the European Federation of Pharmaceutical Industries and Association (EFPIA), a federation which represents the biopharmaceutical industry operating in Europe. Through its direct membership of 36 national associations, 39 leading pharmaceutical companies and a growing number of small and medium-sized enterprises (SMEs), EFPIA's mission is to create a collaborative environment that enables our members to innovate, discover, develop, and deliver new therapies and vaccines for people across Europe, as well as contribute to the European economy.

In addition to our internal-facing projects, we continue our collaboration with the Innovative Medicines Initiative (IMI) in Europe, a public-private partnership between the European Union and the European pharmaceutical industry. Bristol Myers Squibb took a leading role in an IMI project called iPiE, Intelligence-led Assessment of Pharmaceuticals in the Environment, and in 2021 are co-leading the effort to develop a private-public partnership between called the Innovative Health Initiative. This important research is supporting our planet by advancing the science around pharmaceuticals in the environment.

In 2021, our Global Go Green employee-led initiative held virtual global Earth Day, Earth Hour, Energy Conservation and Recycling celebrations to continue to engage employees and support efforts to protect the environment at work and at home. Bristol Myers Squibb employees around the world demonstrated their commitment by participating in a range of activities from establishing on-site sustainable organic gardens and beehives to planting trees to recycling materials and cleaning greenways and watershed areas with the goal of building awareness about conservation of energy and water. The initiative has also facilitated the creation of ride-share and alternative transportation functions to reduce the environmental

impact of employee commuting. As we maintained laboratory operations during the pandemic, our Green Labs certification program, which encourages employees to reduce the environmental impact of their work, including energy, water and waste, continued to grow, with nearly 600 labs certified (92% of all labs within the BMS facilities are now participating). In addition, during 2021, we developed the framework for both our Zero-Waste-To-Landfill site program and our Green Office certification program, with input from employees across our global enterprise. In 2022 we will be launching these programs at select sites across the network, in support of our 'Green Return to Work' initiative.

[The Principles of Integrity -- our Standards of Business Conduct and Ethics for Employees](#) provide a common framework for how we conduct business, interact with our colleagues, and serve our patients. Annual training on our Standards of Business Conduct and Ethics, which includes a section on Anti-Corruption is required for all employees. Additionally, we actively participate in many industry associations with the stated goal of enhancing global anti-corruption awareness and improved industry conduct. Examples include PSCI, IFPMA, EFPIA, and PhRMA, of which Dr. Caforio, Chairman and Chief Executive Officer of Bristol Myers Squibb, served as [chairman of the board of directors](#) in 2020.

We are members of a consortia of biopharmaceutical and pharmaceutical companies who worked with the Norges Bank to create the Norges Bank Investment Management (NBIM) guidance for corporate Anti-Corruption. In addition, we participated as members of the IFPMA ESG Working Group to craft a white paper providing a Biopharmaceutical Industry ESG proposal for Demonstrating Value and Engendering Trust Through Ethics and Business Integrity Indicators. This proposal will be presented to the Biopharmaceutical CEO Roundtable (BCR) in December 2021 and used to drive constructive discussions with key ESG stakeholders in 2021 and 2022.

The Bristol Myers Squibb website ([bms.com](https://www.bms.com)) contains additional information about our policies, goals and progress relevant to the U.N. Global Compact, as well as our Sustainability and Corporate Social Responsibility programs. These resources include our [2020 ESG Report](#), which follows the Biopharma Investor ESG Communications Guidance (Guidance 2.0) released in April 2020 and inspired by the Sustainability Accounting Standards Board (SASB) and the Task Force on Climate-Related Financial Disclosures (TCFD). The 2020 BMS ESG report also includes our first Anti-Corruption report using the Norges Bank Investment Management (NBIM) guidance and consolidates our longstanding reporting on sustainability performance with the current Global Reporting Initiative, NBIM, and SASB requirements for the biopharmaceutical sector, providing additional transparency to our progress in this critical area.

Below is a list of the 21 Criteria identified for implementation of the 10 U.N. Global Compact principles and a table that identifies the relevant content from our [website](#) and the public domain.

Bristol Myers Squibb UN Global Compact Communication on Progress 2021



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<i>Implementing the Ten Principles into Strategies & Operations</i>	
Criterion 1: The COP describes mainstreaming into corporate functions and business units	
Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc) ensuring no function conflicts with company’s sustainability commitments and objectives	BMS Corporate Governance Structure BMS 2020 ESG Report BMS Sustainability 2020 Goal Governance for Strategy BMS Sustainability Strategy Overarching Policies BMS EHS&Sustainability Overarching Governance

Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy	BMS 2020 Annual Report BMS 2021 Proxy Statement BMS 2020 ESG Report
Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts	BMS 2021 Proxy Statement
Criterion 2: The COP describes value chain implementation	
Communicate policies and expectations to suppliers and other relevant business partners	BMS Standards of Conduct and Ethics for Third Parties BMS Principles of Integrity
Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence	BMS 2020 Sustainability Goals Supply Chain BMS Supplier Evaluations BMS 2020 ESG Report
Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners	BMS Principles of Integrity BMS Standards of Conduct and Ethics for Third Parties BMS 2020 Sustainability Goals Supply Chain BMS Supplier Evaluations BMS 2020 ESG Report
<i>Robust Human Rights Management Policies & Procedures</i>	
Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights	

<p>Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights) (BRE1 + ARE1)</p>	<p>BMS Position Statement on Human Rights</p>
<p>Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company (BRE 1 + BRE5 + ARE 1 + ARE 5)</p>	<p>BMS Position Statement on Human Rights</p>
<p>Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties (BRE 1 + BRE 5 + ARE 1 + ARE 5)</p>	<p>BMS Position Statement on Human Rights</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2020 ESG Report</p>
<p>Criterion 4: The COP describes effective management systems to integrate the human rights principles</p>	
<p>On-going due diligence process that includes an assessment of actual and potential human rights impacts (BRE 2 + BRE 3 + ARE 2 + ARE 3)</p>	<p>BMS Human Rights Management Approach</p> <p>BMS Principles of Integrity</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2020 ESG Report</p>
<p>Internal awareness-raising and training on human rights for management and employees</p>	<p>BMS Workplace Policies</p> <p>BMS Principles of Integrity</p> <p>BMS 2020 ESG Report</p> <p>BMS Diversity and Inclusion Learning Programs</p> <p>https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/</p>

<p>Allocation of responsibilities and accountability for addressing human rights impacts</p>	<p>BMS Human Rights Management Approach</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p>
<p>Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action (BRE 6 + ARE 6)</p>	<p>BMS 2018 Global Citizenship Report</p> <p>BMS Sustainability 2020 Goal Progress Report</p> <p>BMS 2021 Global Diversity & Inclusion Report</p> <p>BMS Workplace Policies</p> <p>BMS Diversity and Inclusion Learning Programs</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS Supplier Evaluations</p> <p>https://truckersagainststrafficking.org/casestudy/bristol-myers-squibb/</p> <p>https://blog.powertofly.com/supporting-transgender-employees-2648893996.html?rebellitem=12#rebellitem12</p>
<p>Criterion 5: The COP describes effective monitoring and valuation mechanisms of human rights integration</p>	
<p>Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff</p>	<p>BMS Human Rights Management Approach</p> <p>BMS Principles of Integrity</p> <p>BMS Workplace Policies</p> <p>BMS 2021 Global Diversity & Inclusion Report</p> <p>BMS Diversity and Inclusion Learning Programs</p>

	<p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS Supplier Evaluations</p> <p>https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/</p> <p>BMS 2020 ESG Report</p>
<p>System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain (BRE3 + ARE3)</p>	<p>BMS Human Rights Management Approach</p> <p>BMS Principles of Integrity</p> <p>BMS Workplace Policies</p> <p>BMS 2021 Global Diversity & Inclusion Report</p> <p>BMS 2020 ESG Report</p> <p>BMS Diversity and Inclusion Learning Programs</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/</p> <p>BMS Supplier Evaluations</p>
<p><i>Robust Labour Management Policies & Procedures</i></p>	
<p>Criterion 6: The COP describes robust commitments, strategies or policies in the area of labour</p>	
<p>Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies</p>	<p>BMS Principles of Integrity</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p>

<p>Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners</p>	<p>BMS Principles of Integrity</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2020 ESG Report</p> <p>https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/</p>
<p>Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation</p>	<p>BMS 2020 Annual Report</p> <p>BMS Principles of Integrity</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2020 ESG Report</p>
<p>Criterion 7: The COP describes effective management systems to integrate the labour principles</p>	
<p>Risk and impact assessments in the area of labour</p>	<p>BMS Principles of Integrity</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p>
<p>Internal awareness-raising and training on the labour principles for management and employees</p>	<p>BMS Principles of Integrity</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2020 ESG Report</p>
<p>Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in agreement with the representative organization of workers</p>	<p>BMS Principles of Integrity</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2020 ESG Report</p>

	BMS 2021 Proxy Statement
Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration	
Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards	BMS Standards of Conduct and Ethics for Third Parties BMS Supplier Evaluations BMS 2020 Sustainability Goals Supply Chain https://truckersagainstrafficking.org/casestudy/bristol-myers-squibb/ BMS 2020 ESG Report
Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices	BMS Standards of Conduct and Ethics for Third Parties BMS Supplier Evaluations BMS 2020 Sustainability Goals Supply Chain BMS 2020 ESG Report
<i>Robust Environmental Management Policies & Procedures</i>	
Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship	
Reflection on the relevance of environmental stewardship for the company	BMS Company Mission BMS Environmental Stewardship BMS 2020 ESG Report

	BMS 2020 Annual Report
Written company policy on environmental stewardship	Environmental Policy
Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners	BMS Standards of Conduct and Ethics for Third Parties BMS 2020 ESG Report
Specific commitments and goals for specified years	BMS 2020 ESG Report
Criterion 10: The COP describes effective management systems to integrate the environmental principle	
Environmental risk and impact assessments	BMS 2020 ESG Report BMS Environmental Stewardship BMS EHS Management System
Assessments of lifecycle impact of products, ensuring environmentally sound management policies	BMS Product Stewardship BMS 2020 ESG Report BMS Environmental Stewardship BMS EHS Management System
Allocation of responsibilities and accountability within the organisation	BMS Sustainability Governance BMS EHS Management System BMS Environmental Performance
Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship	

<p>System to track and measure performance based on standardized performance metrics</p>	<p>BMS EHS Management System</p> <p>BMS 2020 ESG Report</p> <p>BMS Environmental Data Collection</p>
<p>Leadership review of monitoring and improvement results</p>	<p>BMS EHS Management System</p> <p>BMS 2020 ESG Report</p> <p>BMS Environmental Data Collection</p>
<p>Process to deal with incidents</p>	<p>BMS Environmental Performance</p> <p>BMS EHS Management System</p>
<p>Audits or other steps to monitor and improve the environmental performance of companies in the supply chain</p>	<p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS Supplier Evaluations</p> <p>https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/</p> <p>BMS 2020 ESG Report</p> <p>BMS 2020 Sustainability Goals Supply Chain</p>
<p><i>Robust Anti-Corruption Management Policies & Procedure</i></p>	
<p>Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption</p>	
<p>Publicly stated formal policy of zero-tolerance of corruption (D1)</p>	<p>BMS Principles of Integrity</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p>

Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes(B2)	BMS Principles of Integrity BMS Standards of Conduct and Ethics for Third Parties
Policy on anti-corruption regarding business partners (D5)	BMS Principles of Integrity BMS Standards of Conduct and Ethics for Third Parties
Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle	
Support by the organization’s leadership for anti-corruption (B4)	BMS Position Statement on Human Rights BMS Principles of Integrity
Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees (B5 + D8)	BMS Principles of Integrity BMS Standards of Conduct and Ethics for Third Parties BMS 2020 ESG Report
Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)	BMS Principles of Integrity BMS Standards of Conduct and Ethics for Third Parties
Actions taken to encourage business partners to implement anti-corruption commitments (D6)	BMS Standards of Conduct and Ethics for Third Parties BMS Supplier Evaluations https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/
Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)	BMS Principles of Integrity

	BMS Standards of Conduct and Ethics for Third Parties
Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9)	BMS 2021 Proxy Statement BMS 2020 ESG Report BMS Workplace Policies
Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anticorruption	
Process to deal with incidents (D13)	BMS Principles of Integrity https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/
<i>Taking Action in Support of Broader UN Goals and Issues</i>	
Criterion 15: The COP describes core business contributions to UN goals and issues	
Align core business strategy with one or more relevant UN goals/issues	BMS Alignment to UNSDGs BMS Partnership for the SDGs BMS 2020 ESG Report
Develop relevant products and services or design business models that contribute to UN goals/issues	BMS Partnerships to Meet the UN SDGs BMS Partnership with One Young World UN SDG 10 https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/ BMS 2020 ESG Report https://www.unglobalcompact.org/sdgs/young-sdg-innovators/2020-mentors

<p>Adopt and modify operating procedures to maximize contribution to UN goals/issues</p>	<p>BMS 2018 Global Citizenship Report</p> <p>BMS Partnership with One Young World UN SDG 10</p> <p>https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/</p> <p>https://www.unglobalcompact.org/sdgs/young-sdg-innovators/2020-mentors</p> <p>BMS 2020 ESG Report</p>
<p>Criterion 16: The COP describes strategic social investments and philanthropy</p>	
<p>Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy</p>	<p>BMS 2018 Global Citizenship Report</p> <p>BMS Foundation</p> <p>https://news.bms.com/news/details/2020/Bristol-Myers-Squibb-and-the-Bristol-Myers-Squibb-Foundation-Commit-300-Million-to-Accelerate-and-Expand-Health-Equity-and-Diversity-and-Inclusion-Efforts/default.aspx</p> <p>BMS 2020 ESG Report</p>
<p>Criterion 17: The COP describes advocacy and public policy engagement</p>	
<p>Publicly advocate the importance of action in relation to one or more UN goals/issues</p>	<p>BMS Alignment to UNSDGs</p> <p>BMS Partnership for the SDGs</p> <p>BMS Partnership with One Young World UN SDG 10</p> <p>BMS 2020 ESG Report</p> <p>https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/</p>

	https://www.unglobalcompact.org/sdgs/young-sdg-innovators/2020-mentors https://www.greenbiz.com/article/why-basf-bristol-myers-squibb-and-colgate-palmolive-view-sdgs-innovation-catalyst
<p>Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues</p>	<p>BMS Alignment to UNSDGs</p> <p>BMS Partnership for the SDGs</p> <p>BMS Partnerships to Meet the UN SDGs</p> <p>BMS Partnership with One Young World UN SDG 10</p> <p>https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/</p> <p>https://www.unglobalcompact.org/sdgs/young-sdg-innovators/2020-mentors</p> <p>https://www.greenbiz.com/article/why-basf-bristol-myers-squibb-and-colgate-palmolive-view-sdgs-innovation-catalyst</p> <p>BMS 2020 ESG Report</p>
<p>Criterion 18: The COP describes partnerships and collective action</p>	
<p>Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy</p>	<p>BMS 2018 Global Citizenship Report</p> <p>BMS Foundation Key Initiatives</p> <p>BMS Foundation Focus Areas</p> <p>BMS UICC Partnership</p> <p>BMS Partnership for the SDGs</p>

	<p>BMS Partnerships to Meet the UN SDGs</p> <p>BMS Partnership with One Young World UN SDG 10</p> <p>https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/</p> <p>https://www.greenbiz.com/article/why-basf-bristol-myers-squibb-and-colgate-palmolive-view-sdgs-innovation-catalyst</p> <p>BMS 2020 ESG Report</p>
<p>Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company’s positive impact on its value chain</p>	<p>BMS 2018 Global Citizenship Report</p> <p>BMS Foundation Key Initiatives</p> <p>BMS Foundation Focus Areas</p> <p>BMS UICC Partnership</p> <p>BMS Partnership for the SDGs</p> <p>BMS Partnerships to Meet the UN SDGs</p> <p>BMS Partnership with One Young World UN SDG 10</p> <p>https://truckersagainsttrafficking.org/casestudy/bristol-myers-squibb/</p> <p>https://www.greenbiz.com/article/why-basf-bristol-myers-squibb-and-colgate-palmolive-view-sdgs-innovation-catalyst</p> <p>BMS 2020 ESG Report</p>
<p>Corporate Sustainability Governance and Leadership</p>	

Criterion 19: The COP describes CEO commitment and leadership	
CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact	BMS UNGC CoP Statement 2019
CEO promotes initiatives to enhance sustainability of the company’s sector and leads development of industry standards	BMS 2020 Annual Report BMS 2021 Proxy Statement BMS 2018 Global Citizenship Report BMS 2020 ESG Report
CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation	BMS CEO Led Strategy for 2020 Goals CEO & Board Oversight for Implementation of 2020 Goals BMS 2020 ESG Report
Criterion 20: The COP describes Board adoption and oversight	
Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance	BMS Corporate Governance BMS 2021 Proxy Statement BMS 2020 ESG Report
Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.	BMS 2021 Proxy Statement CEO & Board Oversight for Implementation of 2020 Goals BMS 2020 ESG Report
Criterion 21: The COP describes stakeholder engagement	

<p>Publicly recognize responsibility for the company's impacts on internal and external stakeholders</p>	<p>BMS 2020 Annual Report</p> <p>BMS 2021 Proxy Statement</p> <p>BMS 2018 Global Citizenship Report</p> <p>BMS 2020 ESG Report</p>
<p>Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance</p>	<p>BMS 2021 Proxy Statement</p>
<p>Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'</p>	<p>BMS Principles of Integrity</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2020 ESG Report</p> <p>BMS 2021 Proxy Statement</p>