

Slavery and Human Trafficking Statement for Year Ending December 2016

The UK's Modern Slavery Act of 2015 addresses issues of slavery, servitude, forced or compulsory labor, and human trafficking. The California Transparency in Supply Chains Act of 2010 is a law 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. Both laws require a statement of measures that Bristol-Myers Squibb has taken to tackle slavery and human trafficking.

Bristol-Myers Squibb is a strong supporter of human rights globally both in the workplace at our own facilities and in the external supply chain. We do not condone slavery or human trafficking of any kind and are committed to reducing the risk with our suppliers. Bristol-Myers Squibb joined the UN Global Compact in 2010 supporting principles in human rights and labor, specifically the elimination of all forms of forced and compulsory labor. Bristol-Myers Squibb has a Corporate Policy and Global Position Statement on Human Rights which fully support the principles established under the United Nations Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

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 support 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 and are accessible via the following links:

[PRINCIPLES OF INTEGRITY: BMS Standards of Business Conduct and Ethics \(PDF\)](#)

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

Bristol-Myers Squibb offers a Compliance and Ethics Helpline for employees and Third Parties to report concerns related to potential violations of the 3P Standards or to ask questions about the 3P Standards.

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 increased efforts over the period to mitigate risk in critical suppliers through the Procurement Risk Assessment and Mitigation (PRAM) program. PRAM is a robust supplier qualification process collecting information not only on ability to provide goods or services but also environment, health and safety (EHS), labor and ethics practices.

Bristol-Myers Squibb was a founding member and participates in the Pharmaceutical Supply Chain Initiative (PSCI), which promotes Principles for Responsible Supply Chain Management among suppliers including human rights, labor and ethics. Additional information on PSCI can be obtained here: <https://pscinitiative.org/home> Informational PSCI conferences held around the world to improve supplier capability (China in 2016; India in 2015) have been supported by Bristol-Myers Squibb.

Supplier Audits

Bristol-Myers Squibb conducts audits of its suppliers on a global basis in areas such as quality, EHS and finance. Over the last year, Bristol-Myers Squibb started an audit process for labor and integrity covering critical third party manufacturers in high risk countries.

Training

On a worldwide basis, Bristol-Myers Squibb employees are trained bi-annually on the Standards of Business Conduct and Ethics, the set of standards governing employee actions. They include supporting fully the principles established under the United Nations Universal Declaration of Human Rights, respect for the protection of human rights and to avoid complicity in human rights abuses.

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 website.

Approved by Committee on Directors & Corporate Governance

Signed by:

A handwritten signature in black ink, appearing to read "Giovanni Caforio". The signature is fluid and cursive, with a prominent initial "G" and a long, sweeping tail.

Giovanni Caforio

Chief Executive Officer

March 2017