



## Modern Slavery Statement 2024 Australia

Bristol-Myers Squibb Australia Pty Ltd



# Introduction

This is our fifth Australian Modern Slavery Statement, reflecting on our efforts throughout 2024, to eradicate modern slavery and human trafficking. Our dedicated work to this important cause continues, as we remain committed to taking action to end these abhorrent practices and embedding ongoing vigilance for modern slavery risk into our culture.

This Statement responds to the Australian Modern Slavery Act 2018 (Cth) (the Act), requiring certain Australian entities to draft an annual statement regarding their identification, assessment, and treatment of modern slavery risks within their structure, operations, and supply chain. It also requires such entities to assess the effectiveness of their actions to address such risks.

The Act defines modern slavery across eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour, including where children are subjected to slavery or similar practices, or forced to engage in hazardous work.

## Format



The Statement is in two parts to be read together, namely:

### Part 1. **BMS Global Overview**

The first part sets out the steps Bristol Myers Squibb (BMS) has taken in 2024 to address and mitigate the risk of modern slavery or human trafficking in its supply chains or in any part of its business. In this Statement references to “BMS”, “we and “our” refers to parent company and New York Stock Exchange listed, Bristol Myers Squibb Company, and its subsidiaries unless otherwise specified.

### Part 2. **BMS Australia**

The second part deals specifically with Bristol-Myers Squibb Australia Pty Ltd (BMSA) given the specific Australian legislative reporting requirements.



# PART 1 – BMS GLOBAL OVERVIEW



# BMS's mission, vision, values & commitment

## Our Mission

To discover, develop and deliver innovative medicines that help patients prevail over serious diseases.

## Our Vision

To be the world's leading biopharma company that transforms patients' lives through science.

## Our Values



### INTEGRITY

We demonstrate ethics, integrity and quality in everything we do for patients, customers and colleagues.



### ACCOUNTABILITY

We all own Bristol Myers Squibb's success and strive to be transparent and deliver on our commitments.



### PASSION

Our dedication to learning and excellence helps us to deliver exceptional results.



### URGENCY

We move together with speed and quality because patients are waiting.



### INNOVATION

We pursue disruptive and bold solutions for patients.



### INCLUSION

We embrace diversity and foster an environment where we can all work together at our full potential.

## Our Commitment

To our patients and customers, employees, global communities, shareholders, environment and other stakeholders, we promise to act on our belief that the priceless ingredient of every product is the integrity of its maker.

We operate with effective governance and high standards of ethical behaviour. We seek transparency and dialogue with our stakeholders to improve our understanding of their needs. We take our commitment to economic, social and environmental sustainability seriously, and extend

this expectation to our partners and suppliers. As a responsible corporate citizen, we seek to actively improve the health of the communities where we live, work and serve.

Around the globe, we promote health equity and seek to promote the health outcomes of populations disproportionately affected by serious disease. We believe our diverse and inclusive culture supports better outcomes for all patients and we seek diversity in all aspects of our business.



# BMS' Commitment to Human Rights and Modern Slavery

BMS' commitment to combatting modern slavery and human trafficking is consistent with our values and is reflected across our operations, supply chains, and in our engagement with the communities we serve. We do not condone slavery or human trafficking of any kind and are committed to respecting human rights throughout our business and supply chain. Our commitment embraces internationally recognized human rights standards, including the following:

- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- The International Bill of Human Rights, consisting of:
  - The Universal Declaration of Human Rights (UDHR)
  - The International Covenant on Civil and Political Rights (ICCPR)
  - The International Covenant on Economic, Social, and Cultural Rights (ICESCR)
- The International Labour Organization's (ILO) Core Labour Rights Conventions
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work

We are a signatory of the United Nations Global Compact, supporting its 10 principles on human rights, labour, environment, and anti-corruption, including eliminating forced labour.

BMS is part of the Pharmaceutical Supply Chain Initiative (PSCI), a group of pharmaceutical companies that have established the Principles for Responsible Supply Chain Management (PSCI principles). The PSCI principles promote responsible business practices including human rights, labour, and ethical practices among pharmaceutical suppliers. We are an active member of the Human Rights & Labour Committee and collaborate on the development and execution of supplier capability-building and training.

Since 2019, BMS has collaborated with Truckers Against Trafficking (TAT) to combat human trafficking. In 2024, BMS hosted TAT's Freedom Drivers Project (FDP) at the Healthcare Distribution Alliance's Cargo Security Coalition Meeting. This mobile exhibit educated audiences across the U.S. and Canada through survivor stories, real-life artifacts, and insights into the transportation industry's efforts to combat trafficking. We also leverage the TAT collaboration through engagement with our transportation suppliers on ways they can identify and prevent human trafficking.

We are committed to continually reviewing and evolving our human rights program by strengthening our policies, building greater efficiencies across the organisation, and enhancing transparency. In 2024, our efforts were focused on bolstering policies and supplier contracts, education and training, and increased due diligence across the value chain. We also enhanced the governance of our Human Rights program with direct oversight by our Chief Compliance and Ethics Officer and the establishment of a new Human Rights Lead who will oversee the program.

In 2024, we also evolved our human rights program by:

- Driving operational enhancements to provide greater visibility of our value chain and evolving our governance framework.
- Improving monitoring and engagement, and advancing supplier obligations.
- Establishing new supplier risk assessment and mitigation models to include third-party monitoring, remediation/corrective actions, and escalation processes.





# BMS' Positions, Standards and Disclosures

BMS has standards and responsibilities concerning anti-trafficking, modern slavery, and human rights outlined in the following documents:

- BMS's [Global Position Statement on Human Rights](#) details our core human rights commitment, governance and principles. It emphasizes the standards and responsibilities regarding anti-trafficking, modern slavery and human rights, including our ongoing human rights due diligence in our own operations and suppliers'.
- The [BMS Principles of Integrity](#) (BMS Principles) provide guidance on the ways in which we conduct business in a compliant and ethical manner. Updated in 2024, these Principles embody our high standards of ethical behaviour and form the basis for our interactions with our employees, patients, customers, shareholders and the global community. The BMS Principles support the guidance established under the United Nations Universal Declaration of Human Rights and reinforces our commitment to human rights, stating that we "support and respect the protection of human rights and avoid complicity in human rights abuses."
- The [BMS' Building a Better Future Report](#) highlights our annual progress across our environmental, social, and governance commitments.
- Our [Standards of Business Conduct and Ethics for Third Parties \(3P Standards\)](#) sets the expectations that our suppliers and business partners will ensure responsible sourcing in their operations. The 3P Standards have been translated into 12 languages to support the global supplier base. Revised in 2024, our 3P Standards require suppliers to commit to uphold the adjacent Human Rights-related principles.

## Suppliers commit to our principles

- **Voluntary Employment:**  
BMS prohibits forced, bonded, enslaved, indentured or involuntary prison labour, or engagement in human trafficking.
- **Child Labour and Young Workers:**  
BMS prohibits the use of child labour. 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.
- **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.
- **Non-Discrimination and Fair Treatment:**  
BMS prohibits discrimination and harassment. 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, 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 labour 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 fully supports the principles established under the UDHR, which addresses and acknowledges: 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 and to promote the health, safety and respectful treatment of our employees and our suppliers.

In 2024, BMS established a Human Rights Due Diligence (HRDD) Working Group to build out and embed a more robust due diligence

framework across our value chain. The group engaged with external experts to enhance the company's human rights program, developing operational tools and guidance to support our workforce and supply chain.

The HRDD Working Group also enhanced our Supplier Code of Conduct, implemented a new supplier risk assessment and mitigation model, and established a supply chain governance framework. The team identified key risk areas for the program, advanced supplier engagement through self-assessments and third-party validations, and initiated capacity-building efforts for the organisation.

## Supplier Expectations

As outlined in our [Standards of Business Conduct and Ethics for Third Parties \(3P Standards\)](#), BMS sets expectations that its suppliers and partners are operating with responsible practices in their operations, including respecting human rights and labour, and complying with the laws of the countries in which we do business. Our 3P Standards, which are part of our supplier qualification process, contain these expectations and include an Acknowledgment of Terms. We regularly review and communicate updates of our 3P Standards to our suppliers.



# Supply Chain Verification

Supplier due diligence is a critical element in helping ensure that our suppliers and business partners are upholding the principles that we outline in our 3P Standards. We work hard to manage and monitor that our suppliers and partners are operating with responsible practices in their operations. Included within this expectation is respecting human rights across the value chain and complying with the laws of the countries in which we do business.

As part of an evolution to elevate expectations and benchmark existing practices of suppliers, BMS has a Responsible Sourcing Program (RSP). This program is designed to enable better visibility of our supply chain through greater monitoring, engagement and enhanced supplier requirements. RSP leverages EcoVadis

to assess and evaluate BMS suppliers on critical risk areas including labour and human rights. As part of the program, suppliers are required to not engage with, directly or indirectly, individuals or entities identified on any sanctioned or restricted parties list.

For select suppliers whose due diligence information is not available through third-party tools, BMS will require self-assessment information. We will conduct independent third-party assessments on a sampling of categories and geographies to validate our self-assessment process. For any issues identified through self-assessments or third-party assessments, BMS will work with suppliers to address them through corrective actions and remediation.



## Training

Regular training and awareness around BMS policies and procedures is an essential element to ensure that our employees, contractors, and suppliers are upholding the values and principles that we set forth. We require all our employees to know and adhere to our BMS Principles. We also expect our contractors, consultants, vendors and any individuals who do business with BMS, to comply with the 3P Standards.



# PART 2 – BMS AUSTRALIA





# Identification of reporting entity under Australian Modern Slavery Act

This Modern Slavery Statement is made on behalf of Bristol-Myers Squibb Australia Pty Ltd (ABN 33 004 333 322) (BMSA) for the reporting period 1 January 2024 to 31 December 2024.

BMSA is a reporting entity for the purposes of the Act as it carries on business in Australia and had a consolidated revenue of over \$A100 million during the 2024 reporting period. Previously, BMSA has reported jointly with Celgene Pty Ltd (ABN 42 118 998 771) (Celgene Australia). However, due to BMSA purchasing Celgene Australia's assets in 2024, Celgene Australia has been integrated into BMSA and is no longer a reporting entity.

## Structure and Operations of BMSA

BMS has a significant global presence and as of December 2024, had approximately 30,000 employees in 43 countries, with about 270 employees based at BMSA. Over half of these BMSA employees are based at our Australian headquarters in Melbourne, with the remainder operating remotely throughout Australia. BMSA does not own or control any other entities.

BMS products are globally manufactured in both BMS and external manufacturing sites. All applicable procurement activities are managed by BMS Global Procurement and are required to comply with global company policies and procedures.

BMSA is not involved in the manufacture of product. Rather, 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.<sup>1</sup>

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, licencing and GxP ("good practice") of our company and products, and supporting services in finance, legal and compliance, strategy, HR, IT, etc.

**As detailed above and below, our local and global suppliers are checked to ensure that they meet our high standards and BMSA is committed to longstanding relationships wherever possible.**

1. See [DHL \(AU\) 2023 Modern Slavery Policy Statement](#), accessed online 06/03/2025.



## Overview of Supply Chains

As mentioned previously, BMSA partners with DHL for receiving, warehousing and distributing BMS fully finished, prescription only, pharmaceutical products. BMSA sources pharmaceutical products through BMS group companies. Information on BMS' worldwide facilities is available on the [BMS website](#).

The management of the supply chain for BMS products is managed by BMS and is subject to extensive supplier screening and

conduct requirements outlined above under the heading "Supply Chain Verification". The other goods and services purchased by BMSA largely relate to those required for head office business functions and the corporate teams, which are managed by the procurement teams based in various locations. These include local contracts for cleaning, maintenance, consultancy, recruitment, event/travel management, IT, advertising and other specialist consultancies.

## Risks of Modern Slavery in Australia's operations and Supply Chain

**The overall risk of modern slavery is considered low for BMSA and the broader BMS group. 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 management practices of our suppliers. For example, BMSA's main supplier, DHL, requires all its regions and divisions to adhere to a Code of Conduct supporting the elimination of forced or compulsory labour and the effective abolition of child labour.
- The local sophisticated nature of many of our suppliers and the specialised goods and services being supplied.
- The complex nature of the pharmaceutical industry and pharmaceutical products<sup>1</sup>, the source countries<sup>2</sup> and the corporate social responsibility practices of the organisations 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 provide that they are committed to ethical corporate citizenship and outline the measures they take to fight slavery and human trafficking in their [2023/2024 Statement](#).

1. For example, no BMS product is included in the "at risk" product list categories specified in the Global Slavery Index 2023

2. As specified in the Global Slavery Index 2023.



# 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:



- Forming and supporting a dedicated cross-functional Modern Slavery Working Group to concentrate on addressing modern slavery, mitigating associated risks, and enhancing reporting.



- Periodically 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.



- Responding to modern slavery questionnaires from our main customers which have been comprehensively responded to and accepted unreservedly by such customers.



- Requiring staff to undertake regular training on BMS' global [Principles of Integrity: Standards of Business Conduct and Ethics \(the Principles\)](#). The Principles embody BMS' high standards of ethical behaviour and form the basis of our interactions with employees, patients, customers, shareholders and the global community. There is also specific content on recognising possible signs of slavery and trafficking and mitigating risks.



- Requiring relevant vendors certify compliance with our global [Standards of Business Conduct and Ethics for Third Parties \(3P Standards\)](#), which requires they act in compliance with laws, in an ethical manner, in accordance with human rights (including no forced labour, human trafficking or child labour), and in an environmentally safe manner.



- Notifying vendors of our [Global Position on Human Rights](#) which sets forth our commitment to support the UN principles on human rights, labour, environment and anti-corruption in all business activities, and encouraging them to also support these principles as well.



- Incorporating modern slavery clauses into relevant template contracts.



# Assessing the Effectiveness of Our Actions in Australia

## To assess the effectiveness of our actions:

- an Australian senior management Modern Slavery Working Group from various key functions 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, see Part 1 above for more information.

## Looking Forward

While our Modern Slavery Statement focuses on 2024, our genuine commitment to stamping out modern slavery remains and we will continue to take action to help end these indefensible practices.

## Consultation

The Statement has been prepared under the direction of the Australian Modern Slavery Working Group which consists of a variety of senior executives with an in-depth working knowledge of BMSA. Upstream consultation has occurred generally, as well as in regards with this Statement, including with global ESG team members. In preparing this Statement, no downstream consultation was required as BMSA has no subsidiaries.



# Approval of Statement

This Modern Slavery Statement has been approved by the Board of Bristol-Myers Squibb Australia Pty Ltd and is signed in accordance with the Australian Modern Slavery Act by Director Owen Smith.

A handwritten signature in black ink that reads "Owen Smith". The script is fluid and cursive, with the first name "Owen" and last name "Smith" clearly distinguishable.

Owen Smith  
Director of Bristol-Myers Squibb Australia Pty Ltd

Date: 03/06/2025

