

BRISTOL-MYERS SQUIBB CANADA CO.

AND

CELGENE INC.

ANNUAL REPORT PURSUANT TO THE *FIGHTING AGAINST FORCED LABOUR AND CHILD LABOR IN SUPPLY CHAINS ACT*

MAY 2024

This report addresses the *Forced and Child Labour in Supply Chains Act* (2023) on issues of slavery, servitude, forced or compulsory labour and human trafficking. This report sets out the steps Bristol-Myers Squibb Canada Co. and Celgene Inc. (together, “**BMS Canada**”), together with its parent company, Bristol Myers Squibb Company (“**BMS**”), has taken and will continue to take to address and mitigate the risk of forced labour and child labour in its supply chains or in any part of its business.

1 **BMS’ COMMITMENT**

Consistent with our values, we are a strong supporter of human rights globally in our workplace, at our facilities, in our external supply chain and in our communities. We do not condone 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.

BMS is a signatory of the United Nations Global Compact and supports the 10 principles set out in this framework on human rights, labour, environment, and anti-corruption, specifically the elimination of all forms of forced and compulsory labour. Since 2011, we have submitted our annual Communication on Progress, which further outlines our commitment to these principles and highlights the many ways we bring them to life through our people and our practices in our everyday business.

We also continue to evolve our collaboration with Truckers Against Trafficking (“**TAT**”), which was established in 2019. We promote TAT across our organization through programs like Trafficking Awareness Month which provide employees with tools and resources for how they can help prevent human trafficking. Externally, we work with our transportation suppliers to raise awareness through collaborative education sessions on ways in which they can identify and prevent human trafficking.

BMS participates in 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 ethics practices, among pharmaceutical suppliers. BMS has directly and indirectly supported PSCI-sponsored supplier capability-building conferences and auditor training conferences in key regions of the world.

2 **BMS’ POSITIONS AND STANDARDS**

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

- BMS’s Global Position Statement on Human Rights details our core human rights protection principles. Our commitment embraces internationally recognized human rights standards, including:
 - The United Nations Guiding Principles on Business and Human Rights;
 - The Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises;
 - The International Bill of Human Rights, consisting of:
 - The Universal Declaration of Human Rights;
 - The International Covenant on Civil and Political Rights;
 - The International Covenant on Economic, Social, and Cultural Rights;
 - The International Labor Organization’s Core Labour Rights Conventions and Declaration on Fundamental Principles and Rights at Work;
 - The BMS Principles of Integrity provide guidance on the ways in which we conduct business in a compliant and ethical manner. These Principles embody

our high standards of ethical behavior and form the basis for our interactions with our employees, patients, customers, shareholders and the global community. The 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.”;

- 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. Among other points, the 3P Standards specifically forbid the use of forced or involuntary labour of any kind. The 3P Standards have been translated into 12 languages to support the global supplier base; and
- BMS’ Environmental, Social, and Governance Report highlights our annual progress across our environmental, social, and governance commitments.

We require all our employees to know and to adhere to our Principles of Integrity. We also require our contractors, consultants, vendors, and any individuals who do business with BMS to comply with the 3P Standards.

3 SUPPLIER EXPECTATIONS

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. In our 3P Standards, which are part of our supplier qualification process, we outline these expectations and require suppliers to acknowledge the terms of our 3P Standards.

4 SUPPLY CHAIN VERIFICATION

Supplier due diligence is a critical element in helping to ensure that our suppliers and business partners are upholding the principles that we outline in our Standards of Business Conduct and Ethics for Third Parties. We work hard to manage and monitor that our suppliers and partners are operating with responsible sourcing 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 and clarify expectations for suppliers, BMS established its Responsible Sourcing Program (“**RSP**”). The 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.

RSP development, program preparation, and ways of working were refined in 2023 and will be rolled out to suppliers, beginning in Q1 2024. As part of the program, BMS will leverage tools to prioritize supplier engagement and assessment, with risk being a key factor. Improvements to address risk will follow the RSP Guidance Model, which outlines a road for improvement and is centered around a risk-based approach. Suppliers identified to have higher risk revealed through the RSP may have more due diligence or follow up required.

5 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 in our policies and procedures.

We require all our employees to know and to adhere to our Principles of Integrity. We also expect our contractors, consultants, vendors, and any individuals who do business with BMS to comply with the Standards of Business Conduct and Ethics for Third Parties.

In addition, our employees have voluntary training opportunities to ensure ongoing awareness and compliance with our policies and standards.

6 REPORTING

BMS offers an Integrity Line for employees and Third Parties to report concerns related to potential violations of our policies, principles, and standards, as well as other ethical and legal violations. The Integrity Line is available 24 hours/7-days a week via telephone or web. This confidential reporting system is available in multiple languages and can be found at bms.integrity.ethicspoint.com. If we learn of any allegations of slavery or trafficking through the Helpline or any other means, BMS is committed to promptly investigating and acting to remediate the situation in a responsible manner.

7 **BRISTOL-MYERS SQUIBB CANADA CO.**

With respect to BMS Canada, we provide the following additional information:

(a) Structure, Activities and Supply Chains

BMS is a multinational pharmaceutical company whose mission is to discover, develop, and deliver innovative medicines that help patients prevail over serious diseases. BMS' medicines include chemically synthesized drugs, molecules and a growing portion produced from biological processes.

Bristol-Myers Squibb Canada Co. is a Nova Scotia unlimited liability corporation and is a wholly owned subsidiary of Bristol Myers Squibb Company. Celgene Inc. was an entity incorporated under the *Canada Business Corporations Act* and, as of November 2019, was a wholly owned subsidiary of Bristol Myers Squibb Company. As of November 2019, Bristol-Myers Squibb Canada Co. and Celgene Inc. were operated under a common local senior management team, the members of which report into various functions within the global operations of BMS.

On March 1, 2024, Bristol-Myers Squibb Canada Co. and Celgene Inc. were amalgamated into a single entity which carries on business as Bristol-Myers Squibb Canada Co.

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 focuses on the following pharmaceutical niches: Oncology/Hematology, Cardiovascular and Anticoagulant, Infectious Diseases, and Immunoscience. In 2023, the main products distributed by BMS Canada were Opdivo, Yervoy, Orenicia, Eliquis, Kenalog, Sprycel, Sotyktu, Baraclude, Camzyos, Lysodren, Azactam, Revlimid, Pomalyst, Onureg, Abraxane, and Reblozyl.

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.

(b) BMS Canada Policies and due diligence processes in relation to forced labour and child labour

Vendors and service providers that work with BMS Canada are required to meet the BMS Supplier Expectations as detailed above.

The medicines imported, sold and distributed by BMS Canada are purchased exclusively from other members of the BMS family of companies.

BMS's policies and due diligence processes governing its supply chain are detailed above.

(c) Parts of the BMS Canada business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk

BMS is committed to ensuring that its supply chain is free of forced labour and child labour. This includes, as described above, communicating BMS' principles to all stakeholders and ensuring their commitment to those principles by binding them to the appropriate contractual obligations. BMS has taken initial steps to identify where risk exists in its supply chain by using tools like EcoVadis IQ and establishing programs such as our Responsible Sourcing Program ("RSP"), which is designed to enable better visibility of our supply chain through greater monitoring, engagement and enhanced supplier requirements. BMS is committed to continuous improvement, including efforts to enable greater visibility of its supply chain and evolving its risk assessment and management programs.

(d) Measures taken to remediate any forced labour or child labour

BMS Canada has not identified any instances of forced labour or child labour in its business or supply chain.

(e) 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 labour or child labour in its activities and supply chains

BMS Canada has not identified any instances of forced labour or child labour in its activities or supply chain.

(f) the training provided to employees on forced labour and child labour

All training activities described above apply to BMS Canada employees. BMS Canada employees are required to know and adhere to the BMS Principles of Integrity.

(g) BMS Canada assessment of its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

BMS is committed to ensuring that its supply chain is free of forced labour and child labour. This includes, as described above, communicating BMS' principles to all stakeholders and ensuring their commitment to those principles by binding them to the appropriate contractual obligations. BMS has taken initial steps to identify where risk exists in its supply chain by using tools like EcoVadis IQ and establishing programs such as our Responsible Sourcing Program ("RSP"), which is designed to enable better visibility of our supply chain through greater monitoring, engagement and enhanced supplier requirements. BMS is committed to continuous improvement, including efforts to enable greater visibility of its supply chain and evolving its risk assessment and management programs.

This report is endorsed by the Board of Directors of Bristol-Myers Squibb Canada Co. as follows:



Graham George McNeil, Director

Date: May 23, 2024



[Elaine Phillips \(May 23, 2024 16:04 EDT\)](#)

Elaine Agnes Phillips, Director

Date: May 23, 2024



[Catherine Liu \(May 23, 2024 15:29 EDT\)](#)

Catherine Kai - Yi Liu, Director

Date: May 23, 2024



[Sandra Ramos-Alves \(May 23, 2024 15:19 EDT\)](#)

Sandra Ramos-Alves, Director

Date: May 23, 2024










BMS and Celgene 2024 Report under Forced Labour and Child Labour in Supply Chain Act FINAL (22MAY24)

Final Audit Report

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