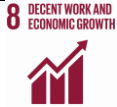


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Bristol Myers Squibb Global Reporting Initiative Content Index






This index aligns with the Global Reporting Initiative’s *2018 Sustainability Reporting Standards*. This report has been prepared in accordance with the GRI Standards: Core option. Our index facilitates access to Core reporting elements as well as additional Comprehensive level elements, where available. We include a link to the pertinent section of the Bristol Myers Squibb website or provide a specific response directly.

We are interested in your feedback. Please [send us your comments](#) on the GRI Content Index below.










Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
GRI 102: General Disclosures					
	GRI 102-1	Core	Name of the organization	Our Company	F
	GRI 102-2	Core	Primary brands, products and services	Our Company SEC Filings	F
	GRI 102-3	Core	Location of organization’s headquarters	New York, New York, USA	F
	GRI 102-4	Core	Number and name of countries where the organization operates	Economic Responsibility Economic Performance Worldwide Facilities	F
	GRI 102-5	Core	Nature of ownership and legal form	Governance Economic Responsibility	F
	GRI 102-6	Core	Nature of markets served (including geographic breakdown, sectors served, and types of customers and beneficiaries)	Economic Responsibility Economic Performance	F
	GRI 102-7	Core	Scale of the reporting organization (employees, operations, net sales, capitalization, quantity of products/services)	Our Company Economic Performance Key Performance Indicators 2019 Annual Report - Consolidated Statements, page 46-48, Product Revenues, page 25 Key Performance Indicators - Number of employees	F
	GRI 102-8	Core	Total workforce by employment type, employment contract, and region, broken down by gender, report significant variations in employment numbers	Global Diversity and Inclusion - Workforce Statistics Key Performance Indicators	P - Total global workforce headcount is provided. Gender and minority

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Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
					breakdown by employment level is currently available for the U.S. workforce only.
	GRI 102-9	Core	Describe supply chain	CDP Supplier Diversity Standards of Business Conduct and Ethics for Third Party Sustainability 2020 Goals Report Our Suppliers	F
	GRI 102-10	Core	Significant changes from previous report regarding size, structure, ownership, or its supply chain	About Us Key Performance Indicators SEC Filings	F
	GRI 102-11	Core	Explanation of whether and how the precautionary approach or principle is addressed by the organization	Systems for Managing Risks Our Principles Position on Human Rights Product Stewardship	F
	GRI 102-12	Core	External charters, principles, initiatives	Overarching Policies– Voluntary standards	F
	GRI 102-13	Core	Memberships in associations	Stakeholder Engagement– Business association memberships	F
	GRI 102-14	Core	Statement from senior management	2018 Global Citizenship Report, page 1 Sustainability 2015 Goals Final Report, Page 2 2019 Annual Report, Page 2	F
	GRI 102-15	Comp	Description of key impacts, risks, and opportunities	SEC Filings Systems for Managing Risks Sustainability Issues	F
	GRI 102-16	Core	Internally developed statements of mission or values, codes of conduct, codes of ethics, and principles relevant to sustainable development	Codes of Conduct Our Mission & Commitment Standards of Business Conduct and Ethics, Third Party	F

Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
	GRI 102-17	Comp	Internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and matters related to organizational integrity, such as escalation through line management, whistleblowing mechanisms or hotlines	Codes of Conduct Standards of Business Conduct and Ethics, Third Party Contact Us	F
	GRI 102-18	Core	Governance structure of the organization, including committees under the highest governance body. Identify any committees responsible for decision-making on economic, environmental and social impacts.	Governance Board of Directors Board Committee & Charters	F
	GRI 102-19	Comp	Process for delegating authority for economic, environmental and social topics from highest governance body to senior executives and other employees	Our Commitment to Responsibility Principles of Integrity: BMS Standards of Business Conduct and Ethics Board Committees & Charters Corporate Governance Guidelines	F
	GRI 102-20	Comp	Identify executive-level position with responsibility for economic, environmental and social topics and reporting to highest governance body.	EHS Management System Leadership Team	F
	GRI 102-21	Comp	Mechanisms for consultation between stakeholders and highest governance body on economic, environmental and social topics	Codes of Conduct Third Party Standards Contact Our Directors Stakeholder Engagement	F
 	GRI 102-22	Comp	Composition of the highest governance body and its committees	Corporate Governance Guidelines Board of Directors	F
	GRI 102-23	Comp	Indicate whether the Chair of the highest governance body is also an executive	Our Company Corporate Governance Guidelines Governance	F

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Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
			officer, and if so, reason for this arrangement	Board of Directors	
  	GRI 102-24	Comp	Report the nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members	Corporate Governance Guidelines – Composition and Structure of the Board Committee on Directors and Corporate Governance	F
 	GRI 102-25	Comp	Processes in place for the highest governance body to ensure conflicts of interest are avoided and managed	Corporate Governance Guidelines – Board Responsibilities – Item 4. Compliance, Ethics and Conflicts of Interest	F
	GRI 102-26	Comp	Role of highest governance body and senior executives in developing, approving, and updating the purpose, value, or mission statements, strategies, policies and goals related to economic, environmental and social impacts.	Priority Assessment Sustainability 2020 Goals Sustainability 2020 Goals Report Our Mission & Commitment EHS Policy Corporate Governance Guidelines EHS Management System Integration	F
 	GRI 102-27	Comp	Measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental and social topics	Priority Assessment Sustainability 2020 Goals Corporate Governance Guidelines EHS Management System Integration	F
	GRI 102-28	Comp	Process for evaluating the highest governance body's own performance with respect to economic, environmental and social and if evaluation is independent or self-assessment	Corporate Governance Guidelines – Evaluating the Board's Performance Committee on Directors and Corporate Governance Charter EHS Management System	F
 	GRI 102-29	Comp	Process of the highest governance body's role for overseeing the organization's identification and management of economic, environmental, and social	Corporate Governance - Organization Committee on Directors and Corporate Governance Charter	F

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Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
			performance and if stakeholder consultation is used	EHS Management System Third Party Standards Sustainability 2020 Goals Priority Assessment	
	GRI 102-30	Comp	Role of the highest governance body in reviewing the effectiveness of the organization's risk management processes for EES topics	Board Committee & Charters - Audit Committee Charter – Responsibilities and Duties – Item 10 Sustainability 2020 Goals EHS Management System Integration	F
	GRI 102-31	Comp	Frequency of the highest governance body's review of EES impacts, risks, and opportunities	Board Committee & Charters - Committee on Directors and Corporate Governance Charter – Responsibilities and Duties - Items 15 & 17 Sustainability 2020 Goals Report Sustainability 2020 Goals Sustainability 2015 Goals EHS Management System Integration	F
	GRI 102-32	Comp	Highest committee or position that formally reviews and approves the organization's sustainability report and ensures all material Aspects are covered	EHS Management System Integration	F
	GRI 102-33	Comp	Process for communicating critical concerns to the highest governance body	Board Committee & Charters Systems for Managing Risks EHS Management System Integration	F
	GRI 102-34	Comp	Nature and total number of critical concerns that were communicated to the highest governance body and the	Sustainability Priority Assessment Corporate Governance Guidelines	P

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Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
			mechanism(s) used to address and resolve them	Committee on Directors and Corporate Governance Charter Systems for Managing Risks EHS Management System Integration	
	GRI 102-35	Comp	Remuneration policies for highest governance body and senior executives; linkage between compensation for members of the highest governance body, senior managers, and executives, and the organization's performance	Corporate Governance Guidelines Governance & Executive Compensation Policies Corporate Governance Guidelines - Annual Evaluation of the Chief Executive Officer Compensation and Management Development Committee Charter	F
	GRI 102-36	Comp	Process for determining remuneration.	Corporate Governance Guidelines Governance & Executive Compensation Policies Corporate Governance Guidelines - Annual Evaluation of the Chief Executive Officer Compensation and Management Development Committee Charter	F
	GRI 102-40	Core	List of stakeholder groups engaged by the organization	Stakeholder Engagement World Health Organization Access to Medicines UN Global Compact Pharmaceutical Supply Chain Initiative Together on Diabetes What We Support Grants & Giving Drug Donations and Philanthropic Efforts Disaster Relief & Product Donations	F


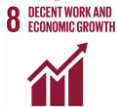

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Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
				Bristol-Myers Squibb Foundation Bristol-Myers Squibb Foundation - Our Key Initiatives Partnering Political Contributions Investor Relations Our Communities Worldwide Facilities Workplace Policies Priority Assessment	
	GRI 102-41	Core	Percentage of total employees covered by collective bargaining agreements	Not Reported	N – Information is not collected globally
	GRI 102-42	Core	Basis for identification and selection of stakeholders with whom to engage	Stakeholder Engagement Partnering Science and Technology Areas of Interest Partnering Brochure How to Apply for Bristol-Myers Squibb Foundation Grants Political Contributions Corporate Giving Independent Medical Education Supporting Our Communities	F
	GRI 102-43	Core	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	Stakeholder Engagement Board Committee & Charters - Committee on Directors and Corporate Governance Charter – Responsibilities and Duties - Item 13	F
	GRI 102-44	Core	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns. Report	Position on Key Issues Stakeholder Engagement Priority Assessment SEC Filings – Proxy Filings	F








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Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
			stakeholder groups that raised each key topic and concern.		
	GRI 102-45	Core	Entities included in financial statements, and specify which are included/excluded from this report	Financial Reporting – 10K and Annual Reports Our Company Partnering Leadership	F
	GRI 102-46	Core	Process for defining report content and aspect boundaries, explain implementation of Reporting Principles for Defining Report Content	About this Report– Reporting Period and Scope Sustainability Issues Stakeholder Engagement	F
	GRI 102-47	Core	List all material Aspects identified in the process for defining report content	Priority Assessment	F
	GRI 102-48	Core	Explanation of the effect of any restatements of information provided in previous reports	Global Reporting Initiative – Reporting Period and Scope Transportation	F
	GRI 102-49	Core	Significant changes from previous reporting periods in the Scope and Aspect Boundaries	Global Reporting Initiative – Reporting Period and Scope	F
	GRI 102-50	Core	Reporting period	Global Reporting Initiative – Reporting Period and Scope	F
	GRI 102-51	Core	Date of most recent report	Global Reporting Initiative – Reporting Period and Scope	F
	GRI 102-52	Core	Reporting cycle	Global Reporting Initiative – Reporting Period and Scope	F
	GRI 102-53	Core	Contact information	Sustainability Feedback Contact Us	F
	GRI 102-54	Core	"In accordance" option and location of the GRI content index	We are reporting in alignment with the Global Reporting Initiative's 2018 Sustainability Reporting Standards. Our index facilitates access to Core reporting elements as well as additional	











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Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
				Comprehensive level elements, where available. GRI Content Index	
	GRI 102-55	Core	GRI content index	GRI Content Index	
	GRI 102-56	Core	External assurance	Global Reporting Initiative Verification Statements	F
GRI 103: Management Approach					
	GRI 103-1	Core	Boundary of the report within the organization, is Aspect material within the organization, and specific limitations	Global Reporting Initiative – Reporting Period and Scope Priority Assessment	F
  	GRI 103-2	Former G4 #: EN34, LA16, HR12, SO11 DMA-b	The management approach and its components	Priority Assessment	
	GRI 103-3	Former G4 #: DMA-c	Evaluation of the management approach	Priority Assessment Board Committee & Charters - Committee on Directors and Corporate Governance Charter – Responsibilities and Duties - Items 15 & 17	
GRI 201: Economic Performance					

Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
<p>5 GENDER EQUALITY</p>  <p>8 DECENT WORK AND ECONOMIC GROWTH</p>  <p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	GRI 201-1	Core	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments	<p>Our Company Researchers and Partners</p> <p>Financial Reporting – 10K and Annual Reports – 2019 Annual Report, (Results of Operations, pages 20-24; Consolidated Financial Statements, pages 46-48)</p> <p>(Fair Value Measurement, pages 70-72)</p> <p>(Accrued Employee Compensation and Benefits, page 80)</p> <p>(Dividends, pages 48, 81)</p> <p>(Interest, page 32)</p> <p>(Charge-backs related to government programs, page 23)</p> <p>2018 Global Citizenship Report Partnering Corporate Giving Economic Performance Key Performance Indicators Benefits Shareholder Value</p>	F
<p>13 CLIMATE ACTION</p> 	GRI 201-2		Financial implications and other risks and opportunities for the organization's activities due to climate change	<p>Greenhouse Gas Emissions - Risk/Opportunity related to Climate Change CDP</p>	F











Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
				Bristol-Myers Squibb Position Statement on Climate Change Goals & Key Indicators	
	GRI 201-3		Coverage of the organization's defined benefit plan obligations	Financial Reporting – 10K and Annual Reports – 2017 Annual Report, (Pension, Postretirement and Postemployment Liabilities, pages 30-32, 80-84)	F
GRI 203: Indirect Economic Impacts					
 	GRI 203-1		Development and impact of infrastructure investments and services supported	Bristol-Myers Squibb Foundation	F
   	GRI 203-2		Significant indirect economic impacts, including the extent of impacts	Indirect Benefits	F
GRI 205: Anti-corruption					
	GRI 205-2	Core	Percentage of employees trained in anti-corruption policies/procedures	Our Principles – All employees must read and sign off on the Principles of Integrity: BMS Standards of Business Conduct	F

Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
				and Ethics as a condition of employment.	
GRI 301: Materials					
 	GRI 301-2		Percentage of materials used that are recycled input materials	Product Stewardship – Eco-Efficiency	P
GRI 302: Energy					
   	GRI 302-1	Core	Direct energy consumption by primary energy source including coal, natural gas, distilled fuel, biofuels, ethanol, hydrogen. The indicator covers scope 1 of the WRI/WBCSD GHG Protocol. Report total direct energy consumption in joules or multiples by renewable/non-renewable primary source.	Energy Conservation Energy Star Award Sustainability Issues Key Performance Indicators Goals & Key Indicators CDP EPA Sustainability 2020 Goals	F
   	GRI 302-2		Energy consumption outside of the organization	Key Performance Indicators - Business Air Travel	P












Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
   	GRI 302-3		Energy intensity	Key Performance Indicators	F
   	GRI 302-4		Reduction of energy consumption	Energy Conservation Environmental Performance Goals & Key Indicators Energy Star Recognitions - Partner of the Year & Challenge for Industry Sustainability 2020 Goals	F
GRI 303: Water					
	GRI 303-1	Core	Total water withdrawal by source	Water Use Environmental Performance Goals & Key Indicators Key Performance Indicators Sustainability 2020 Goals	F – Total water withdrawal is provided with list of source types.
	GRI 303-2		Water sources significantly affected by withdrawal of water	Water Use	F

Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
   	GRI 303-3		Percentage and total volume of water recycled and reused	Water Use Key Performance Indicators Sustainability 2020 Goals Sustainability 2020 Goals Report	F
GRI 304: Biodiversity					
  	GRI 304-3		Habitats protected or restored	Biodiversity and Land Use	F
  	GRI 304-4		Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	Biodiversity and Land Use	F
GRI 305: Emissions					












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<p>3 GOOD HEALTH AND WELL-BEING</p>  <p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p>  <p>13 CLIMATE ACTION</p>  <p>15 LIFE ON LAND</p> 	GRI 305-1	Core	Direct greenhouse gas emissions (Scope 1)	Greenhouse Gas Emissions Key Performance Indicators Sustainability 2020 Goals	F
<p>3 GOOD HEALTH AND WELL-BEING</p>  <p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p>  <p>13 CLIMATE ACTION</p>  <p>15 LIFE ON LAND</p> 	GRI 305-2		Indirect greenhouse gas emissions (Scope 2)	Greenhouse Gas Emissions Key Performance Indicators	F
<p>3 GOOD HEALTH AND WELL-BEING</p>  <p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p> 	GRI 305-3		Other relevant indirect greenhouse gas emissions (Scope 3)	Greenhouse Gas Emissions Key Performance Indicators	P








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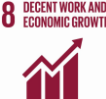



Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
 					
 	GRI 305-4		GHG Emissions intensity	Greenhouse Gas Emissions	F
 	GRI 305-5		Reduction of greenhouse gas emissions	Greenhouse Gas Emissions Energy Conservation	F
  	GRI 305-6		Emissions of ozone-depleting substances (ODS)	Other Air Emissions	F
 	GRI 305-7		NOx, SOx, and other significant air emissions by type	Other Air Emissions	F (NOx and SOx are not considered significant emissions from our facilities)

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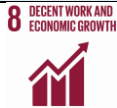


Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
<p>13 CLIMATE ACTION</p>  <p>15 LIFE ON LAND</p> 					
GRI 306: Effluents and Waste					
<p>3 GOOD HEALTH AND WELL-BEING</p>  <p>6 CLEAN WATER AND SANITATION</p>  <p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p>  <p>14 LIFE BELOW WATER</p> 	GRI 306-1		Total water discharge by quality and destination	Wastewater Effluents	P
<p>3 GOOD HEALTH AND WELL-BEING</p>  <p>6 CLEAN WATER AND SANITATION</p>  <p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p> 	GRI 306-2		Total weight of waste by type and disposal method	Waste Key Performance Indicators	P
<p>3 GOOD HEALTH AND WELL-BEING</p>  <p>6 CLEAN WATER AND SANITATION</p> 	GRI 306-3	Core	Total number and volume of significant spills	Compliance and Remediation	F



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Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
 					
 	GRI 306-4		Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally	Key Performance Indicators	F
GRI 307: Environmental Compliance					
	GRI 307-1		Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	Compliance and Remediation	F
GRI 308: Supplier Environmental Assessment					
	GRI 308-1	Core	Percentage of new suppliers that were screened using environmental criteria	Our Suppliers Standards of Business Conduct and Ethics for Third Parties	F
GRI 401: Employment					
	GRI 401-2	Core	Benefits to full time employees	Benefits	F
GRI 403: Occupational Health and Safety					
	GRI 403-1		Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs	Safety – Safety Committees	P


Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
 	GRI 403-2	Core	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities by region and by gender	Safety Key Performance Indicators Sustainability 2020 Goals	P - Recordable case rates, days away from work case rates and fatalities are currently reported companywide. Reporting is aligned with U.S. OSHA reporting regulations. Reporting on absenteeism and breakdowns by region and gender are not available at this time.
GRI 404: Training and Education					
	GRI 404-2	Core	Programs for skills management and lifelong learning that support continued employability of employees and assist them in managing career endings.	Benefits Developing Our People - Development Programs Sustainability 2020 Goals	F
GRI 405: Diversity and Equal Opportunity					
 	GRI 405-1	Core	Composition of governance bodies and employee breakdown per employee category by gender, age, minority group member (other diversity)	Board of Directors Global Diversity and Inclusion Workforce Statistics Our Suppliers Workplace Policies Supplier Diversity Intellectual Property Working With Us	P - Gender and minority breakdowns are provided for our Board of Directors and U.S. workforce. Age breakdowns are not available at this time.
GRI 408: Child Labor					

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Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
	GRI 408-1		Child labor incidents and measures to eliminate child labor	Workplace Policies - Labor Standards of Business Conduct and Ethics for Third Parties , page 3 Bristol-Myers Squibb UN Global Compact Communication on Progress 2020	P
GRI 409: Forced or Compulsory labor					
	GRI 409-1		Forced labor incidents and measures to eliminate forced labor	Workplace Policies - Labor Our Communities Overarching Policies Social Progress Principles of Integrity: BMS Standards of Business Conduct and Ethics	P
GRI 410: Security Practices					
	GRI 410-1		Security personnel trained to understand human rights	Workplace Policies - Security	F
GRI 412: Human Rights Assessment					
	GRI 412-1		Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments	Bristol-Myers Squibb UN Global Compact Communication on Progress 2020	P
GRI 414: Supplier Social Assessment					
	GRI 414-1		Percentage of new suppliers that were screened using social criteria	Our Suppliers - Pharmaceutical Supply Chain Initiative Bristol-Myers Squibb UN Global Compact Communication on Progress 2020 Standards of Business Conduct and Ethics for Third Parties Our Suppliers Doing Business with Us as a Supplier	P

Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
				Supplier Diversity CDP Supply Chain	
GRI 415: Public Policy					
 16 PEACE, JUSTICE AND STRONG INSTITUTIONS	GRI 415-1		Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country	Political Contributions	P
GRI 416: Customer Health and Safety					
	GRI 416-1		Percentage of significant product and service categories for which health and safety impacts are assessed for improvement.	Clinical Trials & Research Product Quality and Safety Sharps Management Plan Product Stewardship Wastewater Effluents – Pharmaceuticals in the Environment Sustainability 2020 Goals	P
 16 PEACE, JUSTICE AND STRONG INSTITUTIONS	GRI 416-2		Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes	Clinical Trials Disclosure Clinical Trials & Research	P
GRI 417: Marketing and Labeling					
	GRI 417-1		Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements	Our Medicines	P
	GRI 417-3		Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes	Financial Reporting – 10K and Annual Reports – 2019 Annual Report, - Note 19 Legal Proceedings and Contingencies pp 88-94	P
GRI 419: Socioeconomic Compliance					

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Sustainability Development Goals #	GRI Standard Disclosure #	Reporting Level	Description	Source on bms.com, or Response	Response Level (F=Full; P=Partial) / Reason for Omission
<p>16 PEACE, JUSTICE AND STRONG INSTITUTIONS</p> 	GRI 419-1		Non-compliance with laws and regulations in the social and economic area	<p>SEC Filings Financial Reporting – 10K and Annual Reports – 2019 Annual Report, - Note 19 Legal Proceedings and Contingencies pp 88-94 Compliance & Remediation Principles of Integrity: BMS Standards of Business Conduct and Ethics, Data Privacy, page 7</p>	F

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Bristol-Myers Squibb UN Global Compact Communication on Progress 2020.

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

<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 Sustainability Governance 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 2019 Annual Report BMS 2020 Proxy Statement BMS Sustainability 2020 Goal Progress Report , page 4

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<p>Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts</p>	<p>BMS 2020 Proxy Statement</p>
<p>Criterion 2: The COP describes value chain implementation</p>	
<p>Communicate policies and expectations to suppliers and other relevant business partners</p>	<p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS Principles of Integrity</p>
<p>Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence</p>	<p>BMS 2020 Sustainability Goals Supply Chain</p> <p>BMS Supplier Evaluations</p>
<p>Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners</p>	<p>BMS Principles of Integrity</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2020 Sustainability Goals Supply Chain</p> <p>BMS Supplier Evaluations</p> <p>BMS 2018 Global Citizenship Report, page 21</p>
<p><i>Robust Human Rights Management Policies & Procedures</i></p>	
<p>Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights</p>	
<p>Commitment to comply with all applicable laws and respect internationally recognized human</p>	<p>BMS Position Statement on Human Rights</p>

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<p>rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights) (BRE1 + ARE1)</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 Sustainability 2020 Goal Progress 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 Sustainability 2020 Goal Progress 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 2018 Global Citizenship Report, page 25</p> <p>BMS Sustainability 2020 Goal Progress Report</p> <p>BMS Diversity and Inclusion Learning Programs</p> <p>https://truckersagainstrafficking.org/casestudy/bristol-myers-squibb/</p>
Allocation of responsibilities and accountability for addressing human rights impacts	<p>BMS Human Rights Management Approach</p> <p>BMS Standards of Conduct and Ethics for Third Parties</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>BMS 2018 Global Citizenship Report, page 24,25,30,31</p> <p>BMS Sustainability 2020 Goal Progress Report</p> <p>BMS Diversity and Inclusion</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://truckersagainstrafficking.org/casestudy/bristol-myers-squibb/</p>

	https://blog.powertofly.com/supporting-transgender-employees-2648893996.html?rebellitem=12#rebellitem12
<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, pages 13-15</p> <p>BMS Workplace Policies</p> <p>BMS Diversity and Inclusion</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://truckersagainstrafficking.org/casestudy/bristol-myers-squibb/</p> <p>BMS Sustainability 2020 Goal Progress 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, pages 13-15</p> <p>BMS Workplace Policies</p>

	<p>BMS Diversity and Inclusion</p> <p>BMS Diversity and Inclusion Learning Programs</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>https://truckersagainstrafficking.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, page 11</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, page 15</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2020 Sustainability Goals</p> <p>BMS Sustainability 2020 Goal Progress Report</p> <p>https://truckersagainstrafficking.org/casestudy/bristol-myers-squibb/</p>

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<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 2019 Annual Report</p> <p>BMS Principles of Integrity, page 11</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2018 Global Citizenship Report, pages 24, 25, 30, 31</p> <p>BMS Sustainability 2020 Goal Progress 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, page 19-23</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, page 17</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2018 Global Citizenship Report, page 25</p> <p>BMS Sustainability 2020 Goal Progress 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,</p>	<p>BMS Principles of Integrity, page 18</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2018 Global Citizenship Report, page 25</p>

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designed and operated in agreement with the representative organization of workers	BMS 2020 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 2018 Global Citizenship Report , page 25
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 Sustainability 2020 Goal Progress Report BMS 2018 Global Citizenship Report , page 25
<i>Robust Environmental Management Policies & Procedures</i>	
Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship	

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Reflection on the relevance of environmental stewardship for the company	BMS Company Mission BMS Environmental Stewardship BMS 2018 Global Citizenship Report , page 1 also pages 218-23 BMS Sustainability 2020 Goal Progress Report BMS 2019 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 , page 4 BMS Sustainability 2020 Goal Progress Report
Specific commitments and goals for specified years	BMS 2020 Sustainability Goals BMS Sustainability 2020 Goal Progress Report
Criterion 10: The COP describes effective management systems to integrate the environmental principle	
Environmental risk and impact assessments	BMS 2020 Sustainability Goals BMS Sustainability 2020 Goal Progress Report BMS Environmental Stewardship

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	BMS EHS Management System
Assessments of lifecycle impact of products, ensuring environmentally sound management policies	BMS Product Stewardship BMS 2020 Sustainability Goals BMS Sustainability 2020 Goal Progress 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	
System to track and measure performance based on standardized performance metrics	BMS EHS Management System BMS Sustainability Governance BMS Environmental Data Collection
Leadership review of monitoring and improvement results	BMS EHS Management System BMS Sustainability Governance

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	BMS Environmental Data Collection
Process to deal with incidents	BMS Environmental Performance BMS EHS Management System
Audits or other steps to monitor and improve the environmental performance of companies in the supply chain	BMS Standards of Conduct and Ethics for Third Parties BMS Supplier Evaluations https://truckersagainstrafficking.org/casestudy/bristol-myers-squibb/ BMS Sustainability 2020 Goal Progress Report BMS 2020 Sustainability Goals Supply Chain
<i>Robust Anti-Corruption Management Policies & Procedure</i>	
Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption	
Publicly stated formal policy of zero-tolerance of corruption (D1)	BMS Principles of Integrity , page 13 BMS Standards of Conduct and Ethics for Third Parties
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 , page 13 BMS Standards of Conduct and Ethics for Third Parties

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Policy on anti-corruption regarding business partners (D5)	BMS Principles of Integrity , page 14 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 , page 14 BMS Standards of Conduct and Ethics for Third Parties BMS 2018 Global Citizenship Report , page 25
Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)	BMS Principles of Integrity , page 14 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://truckersagainstrafficking.org/casestudy/bristol-myers-squibb/

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<p>Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)</p>	<p>BMS Principles of Integrity</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p>
<p>Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9)</p>	<p>BMS 2020 Proxy Statement</p> <p>BMS 2018 Global Citizenship Report, page 25</p> <p>BMS Workplace Policies</p>
<p>Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anticorruption</p>	
<p>Process to deal with incidents (D13)</p>	<p>BMS Principles of Integrity, page 18</p> <p>https://truckersagainstrafficking.org/casestudy/bristol-myers-squibb/</p>
<p><i>Taking Action in Support of Broader UN Goals and Issues</i></p>	
<p>Criterion 15: The COP describes core business contributions to UN goals and issues</p>	
<p>Align core business strategy with one or more relevant UN goals/issues</p>	<p>BMS Alignment to UNSDGs</p> <p>BMS Partnership for the SDGs</p> <p>BMS Sustainability 2020 Goal Progress Report</p>
<p>Develop relevant products and services or design business models that contribute to UN goals/issues</p>	<p>BMS Partnerships to Meet the UN SDGs</p> <p>BMS Partnership with One Young World UN SDG 10</p>

	<p>https://truckersagainstrafficking.org/casestudy/bristol-myers-squibb/</p> <p>BMS Sustainability 2020 Goal Progress Report</p> <p>https://www.unglobalcompact.org/sdgs/young-sdg-innovators/2020-mentors</p>
<p>Adopt and modify operating procedures to maximize contribution to UN goals/issues</p>	<p>BMS 2018 Global Citizenship Report, page 2</p> <p>BMS Partnership with One Young World UN SDG 10</p> <p>https://truckersagainstrafficking.org/casestudy/bristol-myers-squibb/</p> <p>https://www.unglobalcompact.org/sdgs/young-sdg-innovators/2020-mentors</p> <p>BMS Sustainability 2020 Goal Progress 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>

Criterion 17: The COP describes advocacy and public policy engagement	
<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 Sustainability 2020 Goal Progress Report</p> <p>https://truckersagainstrafficking.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>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://truckersagainstrafficking.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>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://truckersagainstrafficking.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>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</p>	<p>BMS 2018 Global Citizenship Report</p>

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<p>extending the company's positive impact on its value chain</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://truckersagainstrafficking.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><i>Corporate Sustainability Governance and Leadership</i></p>	
<p>Criterion 19: The COP describes CEO commitment and leadership</p>	
<p>CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact</p>	<p>BMS UNGC CoP Statement 2019</p>
<p>CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards</p>	<p>BMS 2019 Annual Report</p> <p>BMS 2020 Proxy Statement</p>

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	BMS 2018 Global Citizenship Report, page 1
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
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 2020 Proxy Statement
Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.	BMS 2020 Proxy Statement CEO & Board Oversight for Implementation of 2020 Goals
Criterion 21: The COP describes stakeholder engagement	
Publicly recognize responsibility for the company's impacts on internal and external stakeholders	BMS 2019 Annual Report BMS 2020 Proxy Statement BMS 2018 Global Citizenship Report, page 1
Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance	BMS 2020 Proxy Statement

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<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, page 18</p> <p>BMS Standards of Conduct and Ethics for Third Parties</p> <p>BMS 2018 Global Citizenship Report, page 25</p> <p>BMS 2020 Proxy Statement</p>
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