High Level Guidelines for Corporate Giving: Grants, Giving and Corporate Sponsorship Support

At Bristol Myers Squibb, we are focused on our Mission to discover, develop, and deliver innovative medicines to help patients prevail over serious diseases. Through Corporate Giving, we are committed to support quality initiatives to make a difference in people's lives.

This page describes the principles that Bristol Myers Squibb uses to evaluate Corporate Giving requests.

What is Corporate Giving?

Corporate Giving includes funds or in-kind support (products, assets, or services) provided by Bristol Myers Squibb to eligible third-party organizations for educational, healthcare-related, scientific, community, public policy, patient advocacy or charitable purposes. Some examples include charitable donations to non-profit organizations, support of medical education programs, corporate sponsorships, fellowships, and corporate memberships.

Our Core Corporate Giving Principles

- Bristol Myers Squibb provides Corporate Giving in compliance with our Principles of Integrity, applicable laws, regulations, and industry codes of conduct.
- Bristol Myers Squibb provides Corporate Giving to organizations where we do not have control over the activity for which the funding or In-Kind Support will be used.
- Bristol Myers Squibb provides funding only to eligible institutions or organizations. Funding is not provided to individuals or physician groups.
- Bristol Myers Squibb requires that our funding provided to support a request be acknowledged publicly.

Corporate Giving Requirements:

Organization Eligibility and Requirements:

- Bristol Myers Squibb Corporate Giving is generally made to organizations that have a not-for-profit status. Exceptions include:
 - For-profit medical education providers or medical conference meeting organizers seeking support for Independent Medical Education or Continuing Medical Education.
 - For-profit organizations implementing medical education initiatives and activities that do not meet the above criteria and do not have recent contractual business with BMS.
- Bristol Myers Squibb will consider its overall, annual financial support of requesting organization relative to the organization's most recent annual gross income.
- As part of due diligence for new organizations that haven't previously applied for Corporate Giving support through the Bristol Myers Squibb (BMS) Giving Portal (CyberGrants), organizations may be asked to provide information including:
 - o Names of the organization's Board of Directors and/or Principals
 - o Organization's Mission Statement
 - o Articles of Incorporation or Articles of Registration
 - Most recent year-end tax filing or audited financial statement
 - Detailed budget for the proposed activity at the per person level*
- A Letter of Agreement must be signed prior to the event date by the recipient organization. The signed Letter of Agreement constitutes BMS' financial commitment of support of the proposed event or activity.
- Bristol Myers Squibb will provide payment for an approved request only to the requesting organization or its fiscal agent.

Transparency Requirements:

• Bristol Myers Squibb complies fully with financial transparency laws and industry codes associated with Corporate Giving.

Bristol Myers Squibb does not provide funds to support:

- Start-up or establishment of new organizations
- Prescriber salaries; and operational expenses that are unrelated to the proposed activity.
- O Administrative fees and overhead may be considered on a case-by-case basis
- Retroactive support of activities that have already occurred
- o Entertainment, parties, lavish meals, childcare, and recreational activities
- Lobbying
- Events that have significant gaps in conference agenda during normal business hours*
- Venues that are not considered modest or appropriate for the proposed activity*
- No support of events with venues outside of the US where most attendees are US-based Healthcare Professional (HCP)
- Non-speaker/faculty HCP attendee travel and accommodation*

* Based on organization's local country Code requirements and regulations

Please note that previously approved funding does not guarantee future funding.