

Our Commitment

At Bristol Myers Squibb (BMS), we believe the priceless ingredient of every product is the integrity of its maker. As we work to transform patients' lives through science, we operate with effective governance and the highest ethical standards to deliver on our mission.

BMS is committed to conducting business in compliance with international Anti-Bribery and Anti-Corruption (ABAC) laws and standards. We hold ourselves accountable to uncompromising quality, integrity, compliance, and ethics in everything we do.

Guiding Principles

BMS conducts its business lawfully and forbids bribery, kickbacks, or improper payments anywhere in the world, even if the refusal to make such a payment may result in BMS losing a business opportunity. We do not offer any improper payments, benefits, or anything of value to influence decisions, obtain or retain business, or otherwise secure any improper advantage. Regardless of local customs and practices, giving or accepting a bribe is a violation of the BMS Principles of Integrity.

BMS, its subsidiaries, affiliates and those acting on their behalf must always exercise particular care and caution when interacting directly or indirectly with Government Officials, Government channels, and any affiliated individuals or entities and must comply with all laws, rules, and regulations governing said interactions. BMS prohibits improper transfers of value, including those that create the appearance of impropriety, to Government Officials. We avoid charitable contributions or sponsorships that might be a mechanism disguised for bribes or other corrupt payments.

Corporate Governance

BMS maintains books, records, and accounts that accurately reflect the Company's transactions in reasonable detail. BMS also maintains a system of financial controls that are designed to ensure that transactions are appropriately executed in accordance with management authority and audited regularly.

The business owners of relationships with non-BMS entities are responsible for ensuring that the appropriate due diligence is conducted so that the Company only partners with non-BMS entities that share the Company's commitment to operating according to the highest standards of lawfulness and integrity.

BMS is a signatory of the UN Global Compact¹ and supports the 10 principles set out in this framework on human rights, labor, environment, and anti-corruption. Please see our [Global position statement on human rights for more information](#).

ABAC Program, Training, and Awareness

BMS is committed to maintaining and operating an ABAC program that helps prevent and detect misconduct and mitigate the Company's corruption-related risks, including, but not limited to:

¹ UN Global Compact. <https://www.unglobalcompact.org/>

FINAL DRAFT ABAC Position Statement

- Written procedural documents at the corporate and business unit level that relate to bribery prevention;
- Senior Management commitment to bribery prevention and a corporate culture based on integrity and the highest standards of ethical behavior;
- Periodic risk assessments designed to identify compliance risks, including the risk of bribery, and help prioritize the mitigation activities related to those risks;
- Periodic training and communication to employees about the requirements of the anti-bribery compliance program;
- Regular auditing and monitoring of business activities to determine compliance with procedures related to bribery prevention and procedure effectiveness.; and
- Disciplinary action, including potential termination of employment (where permitted by local law), for violations of the BMS ABAC compliance program.

We strongly encourage BMS employees to report to the Law Department or Compliance & Ethics Department any known or suspected misconduct, including any actions or inactions that may violate applicable policies or ABAC Laws. The BMS Integrity Line is a reporting system available in multiple languages and open 24 hours a day, 7 days a week. BMS policy prohibits threats or acts of retaliation against people who, in good faith, provide information regarding potential misconduct.

As a part of BMS' annual internal and onboarding training processes, all employees are required to complete ABAC training courses. As appropriate, ABAC training is assigned to the third-party's representative via the BMS Third Party System.