

Principles of Integrity

Our Standards of Business Conduct and Ethics

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.

A LEGACY OF INTEGRITY



A LEGACY OF INTEGRITY

In 1921 when the company's first print ad was published, the E.R. Squibb & Sons Company had already been in business for more than 60 years. Its products had found a place everywhere from family homes and hospitals to the battlefields of the Civil War and World War I. In keeping with the practices of the time, marketing stressed the purity of the products.

But as the founder saw it, the most important ingredient could not be manufactured. Dr. Squibb understood that a company, no less than an individual, succeeds or fails on the strength of reputation, a reputation that can only be earned and whose defining feature—the priceless ingredient—is integrity.

The Company has evolved in many ways since that advertisement appeared a century ago and no longer sells consumer goods such as aspirin, cold cream or cod liver oil, instead focusing on efforts to discover, develop and deliver innovative medicines that help patients prevail over serious diseases. Over the years there have been mergers, acquisitions, and divestitures. Today, Bristol Myers Squibb is a leading biopharmaceutical organization with offices around

the world and a global workforce of more than 30,000 employees.

Through this evolution, the truth that Dr. Squibb articulated more than 100 years ago remains timeless.

Companies have their own cultures which are shaped by the tens of thousands of decisions, large and small. The foundation of the culture at BMS is based on the decisions that employees make every day and the Mission, Vision and Values that we embrace.

The Principles of Integrity provides guidance on how to navigate in the much more complex business landscape than existed a century ago. Some of the specific considerations, such as electronic data privacy or securities trading, were not relevant in Dr. Squibb's day. Undoubtedly, the specific issues that the Company will face 100 years from now will look different, too.

Regardless of the ever-changing landscape in which we operate, it is our belief that the same commitment to act with integrity described in that century-old advertisement will continue to be the foundation of the Company's culture in the century to come.



“The formula of every worthy business is honor, integrity and trustworthiness. That is one formula I cannot change.”

– E.R. Squibb

E.R. Squibb and Sons -1921

Dear Colleagues,

At Bristol Myers Squibb, we are firmly committed to uncompromising quality, integrity, compliance and ethics in everything we do. As we work to transform patients' lives through science, we operate with effective governance and the highest ethical standards to deliver our mission. These values have been central to who we are, what we do, and how we do it since our company was founded in 1858. More than 100 years ago, we published an ad that stated, "The priceless ingredient of every product is the honor and integrity of its maker" – and we are very proud this remains true to this day.

We are pleased to present the **2022 Principles of Integrity: The Bristol Myers Squibb Standards of Business Conduct and Ethics**, an important overview of the ways in which we bring these Principles to life in everything we do, in every part of our company. These Principles are the building blocks for our company policies, and they provide a common framework for how we interact with our colleagues, conduct business with our partners and suppliers, and serve our patients and the many communities in which we operate around the world.

If you have any questions or concerns, you can always speak with your supervisor or manager. Additionally, you can report any compliance, ethical or legal concerns to the **BMS Integrity Line**, our 24-hour telephone- and web-based confidential reporting system available in multiple languages. It is important to remember that we will not tolerate retaliation against anyone raising questions or concerns or making a good-faith report of possible improper behavior.

Thank you for your commitment to our Principles of Integrity and all you do for patients and the global community.

Giovanni Caforio
*Board Chair
Chief Executive Officer*



Derica Rice
*Audit Committee Chair
Bristol Myers Squibb Board of Directors*



Introduction to the Principles of Integrity

Our 2022 *Principles of Integrity: the BMS Standards of Business Conduct and Ethics* (Principles) provide general guidance on conducting 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.

These Principles do not provide a complete explanation of all the laws, regulations, policies and procedures that Bristol Myers Squibb employees must follow. We face many complex situations every day making it difficult to create a set of rules that are comprehensive enough to cover every situation. Our Principles help us decide how to act when no specific rule or guidance is available. When making a decision, it is always a good idea to ask yourself, "What is the right thing to do?" "Does it comply with Company policies and relevant laws?" and "How would it be viewed by the public, the media and the government?" Decisions that are grounded in the Principles and that reflect these additional considerations are more likely to be the right ones.

The Principles apply to all BMS employees, as well as contractors working on behalf of BMS. The Principles are the foundation on which our Policies and other BMS procedural documents are built. Together, they form a significant element of our Compliance Program.

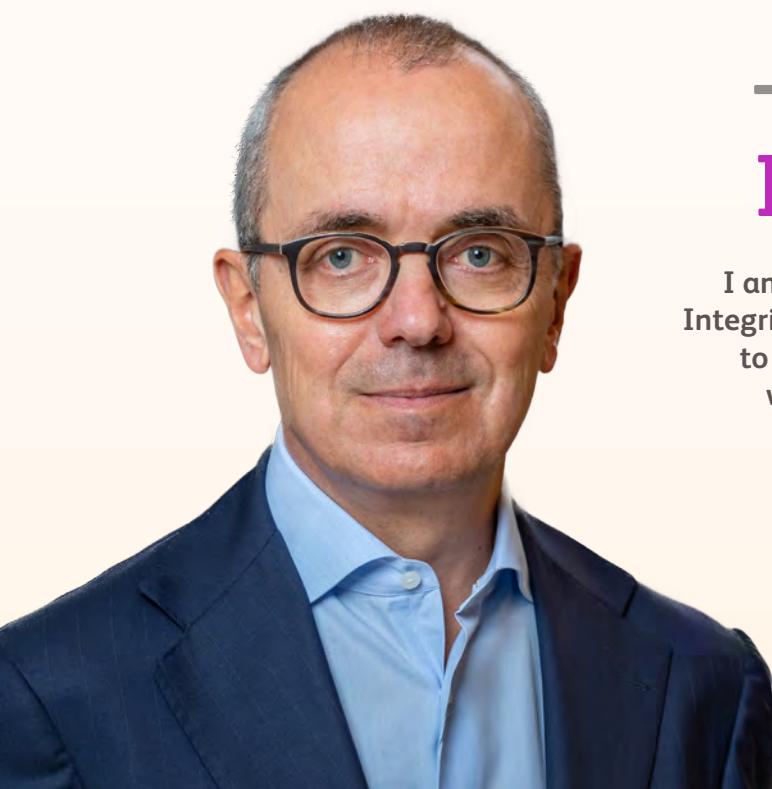
Adherence to our Compliance Program is critically important to help ensure that our Company and its employees can operate appropriately and effectively within a complex, competitive and highly-regulated industry.

You are responsible for understanding and following the Principles as well as all BMS procedural documents that apply to your work. If you have any questions about the Principles or any procedural documents, please contact Compliance & Ethics.

Managers of people at BMS have additional responsibilities when it comes to these Principles and our procedural documents. Managers are expected to foster a culture of compliance and lead by example, demonstrating a commitment to our Principles and acting with the highest standards of integrity. Managers also need to be clear about the policies and other procedural documents that specifically affect the activities they manage and ensure that the employees who report to them receive the training they need to do their jobs effectively and appropriately. Managers should make themselves available to respond to questions and to receive reports of potential violations. When managers receive reports of potential violations of law, policy or procedure, they must further report these concerns to Compliance & Ethics. Every BMS leader and manager should encourage regular discussion of these Principles and promote a work environment where consideration of these Principles is a regular part of business decisions.

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The I in Integrity

I am Giovanni and to me,
**Integrity is our commitment
to patients to always do
what is right for them.**

Giovanni Caforio
Board Chair,
Chief Executive Officer



Protecting Our Patients

We work together cooperatively with a unifying objective to keep patients at the center of everything we do. This mindset results in a standard approach to the way we develop, promote, and manufacture our products.

Scientific and Research

Integrity

We are committed to scientific excellence in biopharmaceutical research and development to advance innovative, high-quality medicines that address the unmet medical needs of patients with serious diseases. We conduct research and development with uncompromised ethical integrity and consistent with

applicable laws, regulations and practice guidelines, including Good Laboratory Practices, Good Clinical Practices and Good Animal Welfare Practices.

Disclosure of Data

BMS is committed to developing Scientific Publications based upon our data and research in order to communicate accurate, timely and scientifically objective information to the scientific community to address the unmet medical needs of patients. BMS adheres to the ethical development of Scientific Publications per good publication practices and supports authors who take accountability for their published work. In the true spirit of science, we are dedicated to sharing our clinical trials information and data with patients, medical/research communities, the media, policy makers and the general public. We do this in a manner that safeguards patient privacy and informed consent, respects the integrity of national regulatory systems

and maintains incentives for investment in biomedical research. In addition, BMS clinical trial results are available on the National Institutes of Health website at ClinicalTrials.gov.

Quality

BMS is committed to providing products and services that meet or exceed customer expectations, applicable laws and regulations. Everyone at BMS is committed to quality excellence, which is the relentless pursuit of continuous improvement underpinned by our BMS values; specifically integrity in all we do is foundational to our commitment to Quality. We fulfill these commitments by:

- Providing the highest quality products and services, and fostering excellence in science and innovation
- Ensuring superior design and the continuous, proactive improvement of products and processes
- Integrating and aligning quality into strategic business plans

- Creating an environment where quality is more than any one action or process; it is a mindset and way of working at every level, throughout every function, and as a driver of every decision
- Ensuring appropriate regulatory and technical training that fosters a quality and compliant culture
- Striving to use the best fit for purpose quality methods, tools and technology in order to reach evidence-based decisions
- Ensuring that we are patient and customer focused, doing things right the first time, and continuously pursuing improvements in how we do it
- Taking personal responsibility for upholding the highest standards of quality, ethics and integrity, along with legal and regulatory compliance
- Enabling enterprise-wide leadership that advocates, recognizes and rewards excellence in quality
- Ensuring quality supervision and oversight of our internal and external network that supports BMS

BMS has a Quality Management System, governance structure, measures and dedicated resources to ensure system effectiveness and continuous improvement.

Product Safety, Quality Complaint and Surety

BMS is committed to ensuring the safety and quality of our products, and protecting the integrity of our products and brands. We fulfill these commitments by:

- Monitoring and evaluating safety and product quality data associated with our marketed medicines and our investigational drugs in clinical trials.
- Ensuring any adverse events, product quality complaints or other events associated with any of our products, when they become aware of them, are promptly reported to meet worldwide safety reporting and product quality

- complaint requirements. Adverse or other events include any unfavorable and unintended sign (including an abnormal laboratory finding, for example), symptom, or disease temporally associated with the use of a medicinal product, whether or not considered related to the medicinal product.
- Ensuring counterfeiting, tampering, theft, or diversion of our products and brands are promptly reported.

Adverse Events and Product Quality Complaints
 Complaints can be reported by sending an e-mail or by calling the BMS Medical Information Call Center. Contact details and the definition of Adverse Events, Product Quality Complaints, and Other Reportable Events can be obtained by accessing the following link: globalbmsmedinfo.com.

Data Integrity and Privacy

We respect and diligently focus on the integrity, privacy and appropriate use of the data that we have access to, upholding regulations and laws which may vary by country. In the normal course of business, our Company receives, collects, maintains, and uses significant amounts of personally identifiable data from individuals related to their financial, health and benefits information. Some of the data may include sensitive information that may pertain to the health of employees, customers, consumers, research subjects, vendors and competitors. We have a Chief Data Officer, a Global Privacy Office and policies to ensure and support the integrity, privacy, protection and appropriate use of data. If you have questions about data integrity and privacy, please contact our Chief Data Officer at dpo@bms.com or our Global Privacy Office at global.privacy@bms.com.

Patient Support Programs

BMS cares about its patients and is committed to providing certain limited services to patients, Healthcare professionals (HCPs) and/or healthcare

organizations (HCOs) to support patients in obtaining access to, adhering to, and/or administering medicines. These programs must be conducted with uncompromising integrity. These programs must not be used, offered, or communicated with the intent to gain access to or build relationships with an HCP or HCO, or be linked to any volume of referrals or business generated, including as a potential inducement or reward for prescribing BMS products. BMS prohibits any activities that may inappropriately influence (or appear to inappropriately influence) HCP/HCO decision-making.

BMS Company Policy

Supporting this Section:

BMS-POL-1 [Protecting Our Patients](#)

[https://purl.bms.com/
pdhq/e/12217467.pdf](https://purl.bms.com/pdhq/e/12217467.pdf)

The I in Integrity

I am Samit, and to me, Integrity is being transparent and honest with the patients and community we work for every day.

Samit Hirawat, M.D.
 Executive Vice President, Chief
 Medical Officer, Global Drug
 Development



Protecting Our Employees

We value and respect one another and share in our Mission to discover, develop and deliver innovative medicines that help patients prevail over serious diseases.

Respect for One Another/ Professional Conduct

We will act in accordance with the highest standards of professional conduct and strive to treat everyone with whom we interact with respect and dignity. Regardless of whether we are interacting face-to-face or communicating in writing or via electronic media, we will do so in a professional, respectful manner. Specifically, the use of offensive language, intimidating or hostile words or actions, and similar unprofessional behavior are contrary to these Principles. We reinforce the importance of building strong relationships, creating an inclusive culture and supporting team members to meet shared goals. BMS leaders and managers have a responsibility to foster a positive working environment that enables respect, honesty, integrity, safety and trust.

Employee Privacy

We respect and diligently protect the personal information of our employees to which we have access. We only collect or use employee personal information when we have a legitimate purpose for its use related to administering and managing employment. We have a Global Privacy Office and policies to support the protection of employee personal information in our business operations. If you have questions about the laws concerning privacy, please contact our Global Privacy Office at global.privacy@bms.com.

Safe Working Environment

We care for and protect the health, safety and well-being of our fellow employees, those who use our products, those who are on Company property or engage in business activities and the public at large. We are each responsible for maintaining a safe working environment, including timely reporting of all workplace accidents, injuries, disease, or conditions that may endanger others. We foster a workplace that is free of illicit drugs and alcohol and are responsible for avoiding excessive alcohol consumption, intoxication or any related unprofessional conduct. Additionally, threatening or violent behavior is not permitted. These concepts apply in the workplace, on Company property, and in any work-related setting outside the workplace, such as during business trips, meetings and business-related social events.



Culture of Inclusion

Our ability to create teams that bring together different geographic, ethnic, cultural, personal and professional backgrounds gives BMS a unique competitive advantage in the marketplace. We take pride in the diversity of our global workforce and will abide by laws that prohibit discrimination everywhere that we do business. We enrich the work experience of our employees by providing them with challenging and meaningful opportunities to develop their careers.

Equal Employment

Opportunity: Non-Discrimination/Anti-Harassment

We ensure equal opportunity without discrimination or harassment in the workplace on the basis of gender, race, color, religion, national origin, age, physical or mental disability, pregnancy, citizenship, status as a protected veteran, marital status, sexual orientation, gender identity and expression, genetic information, or any other characteristic protected by applicable laws. We strive to ensure a work environment where no

one is subjected to unwelcome conduct including disturbing or offensive behavior and language or intimidating, hostile or offensive words, images or actions. Such conduct is entirely unacceptable, inconsistent with these Principles and may result in disciplinary action.

Human Rights

BMS supports fully the principles established under the United Nations Universal Declaration of Human Rights (UDHR) which addresses: equality of all human beings; 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; embrace a diverse and inclusive workforce; and promote the health, safety and equitable and respectful treatment of our employees, without discrimination or harassment.

BMS Company Policy

Supporting this Section:

BMS-POL-2 [Protecting Our Employees](#)

[https://purl.bms.com/
pdhq/e/12282139.pdf](https://purl.bms.com/pdhq/e/12282139.pdf)

The I in Integrity

I am Ann and to me, Integrity is not something that can be taught or given as a gift; it is that internal moral compass that points you in the direction of honesty and truthfulness.

Ann Powell
Executive Vice President,
Chief Human Resources Officer



Reality Check: Threats of Violence in the Workplace Will Not Be Tolerated

The Facts

A report was raised to the BMS Integrity Line stating that a BMS employee had used profanity and made comments about threatening physical harm to another employee. As a result of the allegation, an investigation was opened to review the matter.

The Outcome

Corporate Security interviewed the BMS employee who allegedly made the threatening comments. The employee confirmed that he made a threat to physically harm a colleague after an argument. Witnesses were also interviewed and it was confirmed that the employee raised his voice and used profanity while threatening his colleague's personal safety. During the interview with Corporate Security, the employee was apologetic and remorseful for his actions. He stated that he understood that threats of violence of physical harm to another employee were not in line with the BMS Principles of Integrity. As a result of the investigation findings, the employee was separated from the company.

The Learnings

BMS is committed to providing and maintaining a safe workplace and working environment for all employees. As stated in BMS-SOP-2d, Threats and Violence against BMS and its Employees, "No threats or acts of violence against any person or anyone on BMS property or otherwise engaged in BMS business or other work-related activity will be tolerated."

Employees should immediately report statements, actions or behaviors that threaten, harm or put the safety of any person engaged in BMS business or any BMS asset at risk to local Security, a Human Resources representative, and/or a supervisor. This includes intimidation, threats, assaults, joking about violence, and the presence of weapons or ammunition in the workplace. Reporting concerns immediately enables Corporate Security to act quickly and ensure the safety of all employees.



Conducting Our Business

We value Bristol Myers Squibb's good reputation. We act with honesty and integrity in all of our business interactions, inside and outside of our workplace, knowing that these interactions are essential to maintaining our reputation.

Anti-Corruption

BMS 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. BMS is committed to compliance with international anti-corruption laws and standards such as the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and similar laws in other countries.

Interactions with Healthcare Professionals and Patient Organizations

We respect the practice of medicine and we support the integrity of the physician-patient relationship. We interact with healthcare professionals, patient advocacy groups, payers, and others in a way that does not have, or appear to have, an improper influence on their decisions. In the event that our research or business requires that we engage the services of a healthcare professional to serve as an investigator, consultant or speaker, we do so in order to meet a legitimate and appropriate business purpose and only when the terms of the engagement are consistent with applicable legal and BMS policy requirements. We adhere to applicable industry guidelines and other regulations, only offering meals

and hospitality in a manner that is consistent with our Policies and is conducive to educational, clinical or scientific discussions. We collect, report, and disclose payments and other transfers of value made to healthcare professionals where required by law.

Conflicts of Interest

We seek to avoid situations that present conflicts between our personal interests and those of the Company. We understand that even the appearance of a conflict of interest can damage the Company's reputation and our own. Our business decisions will be governed by good judgment and objectivity not by our personal interests. If you are unsure whether a potential conflict of interest exists, seek guidance from management, the Law Department, or Compliance & Ethics.

Outside Employment and Other Outside Personal Activities

Outside employment is strongly discouraged because it can interfere with our job responsibilities or conflict with BMS business interests. Additionally, you should not use BMS's name, information, work time, property, or other resources to perform a second job or to undertake other outside personal activities. You should also consider potential conflicts with BMS business interests before agreeing to serve as a director, officer or other responsible position for an outside business; seeking a political or other government position; or engaging in service with a charitable, civic, religious, educational, public, political or social organization. Where there is even a potential appearance of conflict, seek guidance and approval consistent with BMS policy.

Promotional Activities

We market our products on the basis of quality, efficacy, safety and value. We seek to ensure that our promotional materials help both healthcare

professionals and patients understand the clinical profile of our products, including the benefits and the risks. Our advertising and promotion will be accurate, truthful and consistent with approved product labeling and applicable law. We use only approved promotional materials with healthcare professionals or patients.

Fair Competition

We support an open and competitive marketplace and will compete only on the strength and value of our products. We respect and adhere to fair competition and trade practices laws. This means that we will not discuss or make any improper agreement with our competitors that affects prices, costs, or terms or conditions of sale; that allocates markets or customers; or that unfairly restricts trade or excludes competitors, suppliers or customers from the marketplace. We will not disparage the products of our competitors and we expect our competitors to hold themselves to similarly high standards.

The I in Integrity

I am Cari, and to me, Integrity is steadfastly following your moral compass; and at BMS our true north is doing what is right for patients.

Cari Gallman
Chief Compliance and Ethics Officer



Reality Check: Conflicts of Interest: Serving as a Director of a Non-BMS Organization

The Facts

The BMS Integrity Line received a concern alleging that a BMS employee was appointed to the Board of Directors of a for-profit company. In response to the allegation, an investigation was opened.

The Outcome

The investigation determined that the employee had joined the Board of Directors of a for-profit, pharmaceutical company without obtaining approval from the CEO, General Counsel, or the Chief Compliance & Ethics Officer of BMS, which violated BMS-SOP-3f, Serving as a Director or Officer of Non-BMS Affiliated Organizations. The investigation revealed that the employee's role as a member of the Board of Directors was a clear conflict of interest. As a result of the investigation findings and other misconduct, the employee was separated from the company.

The Learnings

It is important that all employees understand that outside business activity is strongly discouraged because it can interfere with job responsibilities or conflict with BMS business interests. As stated in BMS-SOP-3e, Conflicts of Interest, "BMS employees must not engage in any outside activity that is competitive with BMS or negatively affects the employee's ability to meet his or her BMS job responsibilities."

Employees should always consider potential conflicts with BMS business interests before agreeing to serve as director, officer or other responsible position for an outside business; seeking a political or other government position; or engaging in service with a charitable, civic, religious, educational, public, political or social organization. Where there is even a potential appearance of conflict, seek guidance and approval consistent with BMS policy. All actual or potential conflicts of interest should be disclosed through our automated conflicts of interest disclosure process. By adhering to our principles and policies, we can ensure that we are all able to focus on the important work that we do for our patients.

International Trade Activities

All BMS businesses must comply with economic sanctions and trade embargoes imposed or approved by the U.S. Government. BMS will not engage in any dealing with a country subject to any U.S. embargoes or trade sanctions without the direct involvement of and prior written approval from the Law Department. Other countries or regional organizations may also impose restrictions on exports or dealings with certain countries, entities, or individuals. We will not engage the services of any healthcare professional who is on a relevant governmental Restricted Parties or Persons list. We will follow all applicable laws, regulations, and restrictions when importing or exporting goods, information, software or technology. We will also abide by applicable anti-boycott laws and will promptly report to authorities any request for BMS to participate in a boycott.

Environment, Occupational Health, Safety and Sustainability

We conduct our business in a safe and environmentally sustainable manner. We are committed to the health and wellbeing of our employees, customers, contractors, and the communities where we operate. We integrate principles of resource conservation, pollution prevention and environmental responsibility into our business processes, facilities, operations, and products to ensure adherence to the BMS Commitments to Environmental Responsibility. As a world class organization, we aspire to high standards and implement systems to help ensure compliance to government regulations and continuous improvement. We have effective processes in place to identify and manage risks with the goals to proactively prevent incidents related to environmental protection and employee health and safety.

Political Activity

We are encouraged to participate in the political process as individuals and we may volunteer for political purposes, or not, as we choose. We may not use Company time, property or facilities for personal political activity. The Company also has a government affairs organization that engages in political activity to advance the objective of ensuring that patients have appropriate access to our medications and that government policies support biopharmaceutical research and innovation. We may use Company time, property and facilities to participate in political activities sponsored by our government affairs department. These include educational events, Company grassroots initiatives, and activities sponsored by the BMS Employee Political Advocacy Fund for Innovation (EPAF) which is a U.S.-based, non-partisan, employee political action group that is organized under federal campaign finance laws. Employees may not request reimbursement for any political contribution.

Purchasing, Contracts and Real-World Data

We purchase goods and services and obtain licenses to Real-World Data solely on the basis of quality, safety, price and the value they provide. We expect the third parties with whom we work to share our commitment to integrity and fair dealing. We seek to avoid conflicts of interest in our purchasing decisions for the Company. We work collaboratively with Strategic Sourcing & Procurement and the Law Department to ensure that we have appropriate written agreements, such as contracts, statements of work or other documents. These documents protect the Company's interests, follow applicable laws, and are consistent with the Company's values, ethical standards and commitment to integrity.

Corporate Giving

BMS is committed to good citizenship and gives both financial and in-kind support to make a difference in the world we serve. BMS provides Corporate Giving to help patients, to build communities where we live and work, and to advance scientific understanding.

BMS Company Policy
Supporting this Section:
BMS-POL-3
[Conducting Our Business](#)
[https://purl.bms.com/
pdhq/e/12289460.pdf](https://purl.bms.com/pdhq/e/12289460.pdf)

The I in Integrity

I am Michelle, and to me, integrity is following your moral compass no matter who is watching, even if you have to stand alone.

Michelle Weese, Executive Vice President, Corporate Affairs



Integrity line

For Reporting of Ethical and Legal Concerns

<http://bms.integrity.ethicspoint.com>

You must report any compliance concerns where you believe violations of policies or standards may have occurred related to any topic in the **Principles of Integrity** to any of the following reporting channels:

- a supervisor
- an Employee Relations Specialist or employees' representative
- an appropriate management representative
- an attorney in the Law Department
- Compliance & Ethics
- The BMS Integrity Line (bms.integrity.ethicspoint.com)

Reporting directly to the BMS Integrity Line is the employee's choice and the decision to use this channel will not be punished. Reporting concerns shall not lead to and is not intended to encourage false accusations.

In situations where you prefer to anonymously ask a question or report an issue in confidence, you are encouraged to use the Integrity Line, hosted by NAVEX Global, a third-party hotline provider. The information you provide will be sent to BMS for assessment and resolution.

BMS has a strict policy AGAINST retaliation.

Reports can be made confidentially and anonymously, where local law permits, and without fear of reprisal.
Your comments will be heard.

Data Privacy Restrictions may apply.



Governing Our Organization

We cultivate an environment where our Principles of Integrity are embedded into what we do every day; where compliant and ethical behavior is recognized and valued.

Compliance with Laws and Regulations

We will follow all laws, regulations, and Company policies that govern our work. In many cases, our Principles strive for a higher standard than laws and regulations require. Laws and regulations may vary depending on the country or state in which we work or the BMS business entity for which we work. We comply with the laws in the countries and states in which we work. In addition, because BMS is a public company based in the U.S., some U.S. laws

apply to BMS businesses outside of the U.S. We must understand which laws apply to our business activities and we will consult the BMS Law Department when in doubt.

Applying These Principles

We are each responsible for incorporating these Principles into our work and our business decisions. We are expected to understand the procedural documents that impact our own work and to ask our managers or other responsible BMS employees when we have questions.

Managers of people at BMS have additional responsibilities when it comes to these Principles and our procedural documents. Managers are expected to foster a culture of compliance and lead by example, demonstrating a commitment to our Principles and acting with the highest standards of integrity. Managers also need to be clear about the policies and other procedural documents that specifically affect the activities they manage and ensure that the employees who report to them receive the training they need to do

their jobs effectively and appropriately. They should make themselves available to respond to questions and to receive reports of potential violations. When managers receive reports of potential violations of law, policy or procedure, they must further report these concerns to Compliance & Ethics. Every BMS leader and manager should encourage regular discussion of these Principles and promote a work environment where consideration of these Principles is a regular part of business decisions.

Reporting Concerns and Getting Help

If you have questions about these Principles or any BMS Procedural Document you should communicate your questions to your manager or another responsible BMS employee. If you have concerns about potential violations of BMS Policies, or about illegal or unethical business conduct or questionable accounting, internal controls, or auditing issues, you can choose any of the following optional reporting channels:

- a supervisor
- an Employee Relations Specialist or employees' representative
- an appropriate management representative
- an attorney in the Law Department
- Compliance & Ethics
- The BMS Integrity Line
bms.integrity.ethicpoint.com

Reporting directly to the [BMS Integrity Line](#) is the employee's choice and the decision to use this channel will not be punished. Reporting concerns shall not lead to and is not intended to encourage false accusations.

What Happens When Concerns are Raised?

Responsible BMS managers and employees will respond to all requests for advice and will thoughtfully consider

all reports of improper behavior. Investigations will be conducted as appropriate. Individuals are expected to cooperate with and to be truthful and forthcoming during the course of any investigation. Any disciplinary measure and corrective action will depend on the specific facts and circumstances. Actions contrary to law, our Principles or other company policies may be grounds for disciplinary action, up to and including termination, subject to local law and the terms of any applicable collective bargaining agreement. Failure to report improper behavior, knowingly making a false report, or refusing to cooperate with an investigation may also be grounds for disciplinary action.

Corporate Ombuds

The Company recognizes that there are times when workplace concerns are best addressed through an alternate channel due to their nature or sensitivity. In these cases, employees may contact the Corporate Ombuds. The Corporate Ombuds is a neutral and impartial resource who seeks to ensure organizational justice and to find fair and equitable solutions to workplace concerns that cannot be resolved through established channels such as the employee's supervisor, an Employee Relations specialist, or employees' representative. The Corporate Ombuds is responsible for independently reviewing and assisting in the resolution of these concerns, taking into consideration the rights and obligations of all involved.

No Tolerance for Retaliation

Open communication is vital to the success of our Company. We are committed to maintaining a work environment where people can ask questions, voice concerns, and make appropriate suggestions regarding business practices. We will not tolerate retaliation against anyone for raising questions or concerns or making

a good-faith report of possible improper behavior.

Enterprise Risk Management

BMS identifies, assesses and manages enterprise risks to allow better decision-making concerning risk and supports the achievement of business objectives through a holistic view of BMS operations.

BMS Company Policy

Supporting this Section:

BMS-POL-4

[Governing Our Organization](#)

[https://purl.bms.com/
pdhq/e/12218461.pdf](https://purl.bms.com/pdhq/e/12218461.pdf)

The I in Integrity

I am Sandy and to me, Integrity is looking in the mirror and feeling proud of the person staring back at you everyday.

Sandra Leung
Executive Vice President,
General Counsel





Applying Internal Controls

We ensure accuracy, quality and appropriate handling and use of BMS information and other assets in everything we do. We act with integrity at all times.

Product Inventory Levels

We will maintain appropriate inventory levels with direct and indirect customers that are reflective of their expected demand or supported by special circumstances. We use reasonable best efforts to implement product inventory management policies and procedures that are consistent with this objective.

Corporate Records

Accurate information is required to make good business decisions. We will create and maintain accurate and complete business records and supporting detail. This includes financial and accounting records, business travel and entertainment expense records, work activity and

time records and other records made on behalf of the Company. We will handle confidential, sensitive and proprietary records with care in accordance with Company policies and procedures. We will retain documents, including electronic records, in accordance with Company policies and any instructions from the BMS Law Department.

Protection of Confidential Information

During the course of our work, we may create or learn confidential information about BMS or BMS business partners, suppliers or customers. To protect the Company's interests, we do not share this sensitive information with anyone inside or outside of BMS

who does not have a legitimate business need to know it. In situations where it is appropriate to share such information, we will obtain appropriate approvals and confidentiality agreements. If you are unsure about the sensitive or proprietary nature of certain information, you will seek advice and guidance from the Law Department. Our obligation to protect confidential information continues during and after employment with BMS.

Protection of Company Assets

We respect and care for all BMS assets and resources and commit to using those assets to further the Company's Mission. We strive to protect BMS assets, including

physical equipment, funds, property, supplies or other items of value. We understand that the theft or destruction of BMS assets is damaging to the Company and prohibited. We will obtain permission before using BMS assets for projects or purposes outside of their normal business use.

Intellectual Property

Business and product innovations are among BMS's most valuable assets. Intellectual property – such as patents, trade secrets, copyrights, trademarks, logos, business processes, research, and customer or supplier lists – provides BMS with a competitive advantage. We share a passion to be innovative, to develop new ideas and new ways to do things, and we must also share in the responsibility to protect BMS's innovation and intellectual property assets. We will protect such intellectual property against loss, theft or other misuse. We also

respect the intellectual property rights of third parties.

Public Disclosure

BMS will provide accurate and timely information about financial, operational and other matters to investors, government agencies and the general public. All reports and documents submitted to the U.S. Securities and Exchange Commission (SEC) or other government agencies, and all public communications, will include fair, accurate, timely, and understandable disclosures that are not misleading. To ensure adherence to this Principle, only specific employees are authorized to make public disclosure of BMS information.

Material Nonpublic Information

We may not disclose confidential or material nonpublic information about BMS or the companies with whom we

The I in Integrity

I am Greg and to me, Integrity is about being committed to something bigger than yourself.

Greg Meyers
Executive Vice President, Chief Digital & Technology Officer



Reality Check:

Safeguarding BMS Confidential Information

The Facts

While reviewing an employee's emails during the course of an investigation, Compliance and Ethics (C&E) discovered the employee had forwarded a number of emails to addresses external to BMS, specifically, the employee's own personal email address and the work email address of his significant other, who was employed at another pharmaceutical company.

C&E discovered that some of the emails forwarded by the employee to both his personal email and his significant other's work email address contained information specifically identified as BMS Confidential, including multiple documents specifically marked "BMS – Highly Confidential – Do Not Forward."

The Outcome

It was determined that the employee violated BMS policies on information handling and computer system and network usage due to his having emailed BMS information to external email addresses, including his own personal email address. As stated in BMS-SOP-5d, The Use and Protection of Computers, Other Digital Resources and Information, "Individuals are prohibited from forwarding BMS information to their personal e-mail account(s)...and may not use unauthorized digital resources including software or cloud computing, in the conduct of BMS business."

In addition, the Principles of Integrity clearly state that, "During the course of our work, we may create or learn confidential information about BMS or business partners, suppliers or customers. To protect the Company's interests, we do not share this sensitive information with anyone inside or outside of BMS who does not have a legitimate business need to know it." Regardless of the employee's good intentions, the employee should not have discussed or shared (via email or verbally) BMS confidential information with his significant other.

As a result of the investigation findings, the employee was placed on a Written Warning.

The Learnings

All BMS employees are responsible for protecting the Company's confidential information. It is crucial that we adhere to our policies regarding computer usage and information sharing. If you are unsure about the confidentiality or proprietary nature of certain information, you should seek advice and guidance from the Law Department. Adhering to our principles and policies ensures that we are all doing our part to protect the company.

do business to anyone inside or outside the Company who is not authorized to receive it. Material nonpublic information is a type of confidential information (information that has not been made public) that a reasonable investor is likely to consider important in determining whether to buy or sell a corporation's stock. The way in which we handle material nonpublic information is controlled by law and by BMS policy. These rules govern when and how certain information must be disclosed.

Securities Trading

We will not use material nonpublic information about BMS or other companies for personal benefit. We will not trade securities based on such information and we will not provide such information to others. Securities include, but are not limited to, shares of stock, stock units (including performance share units and market share units) stock options, notes and debentures. At times, we may receive confidential information about BMS or other companies with which BMS does business before it is made publicly available. Some of this nonpublic or "inside" information may be material. Employees with knowledge of material nonpublic information about BMS or companies that we do business with should treat the information as highly confidential and should not trade in the stock of BMS or those other companies. This type of material nonpublic information includes:

- internal financial information
- commencement of a new line of business
- development, approval or a lack of approval of a new medicine or technological breakthrough
- consideration of a major transaction, such as an acquisition of another company, a divestiture, a significant license, or a collaboration agreement

- initiation or termination of significant litigation or a government investigation
- any other significant development that could impact the stock price

Information is considered public only if it has been made generally available to investors by BMS and if investors have been allowed a reasonable period to react to the information. This can include information in BMS's SEC filings, in a press release, posted on bms.com or otherwise widely reported in media and confirmed by BMS. Employees will also not engage in any transaction that may profit from short-term speculative swings in the value of BMS securities including "short sales," "put" and "call" options, and other hedging transactions. We will contact the Law Department if we have questions before buying or selling BMS securities.

Information Asset Protection

We use computers, information systems, the internet, e-mail, and an increasing range of mobile devices in virtually every aspect of our business, inside and outside of normal business hours and locations, globally. We hold ourselves responsible and will take appropriate steps to ensure the security of all digital devices and services used in the conduct of BMS business, regardless of the time, location or ownership of the device or service. We understand and respect that the Principles of Integrity fully apply to the use of electronic equipment and the conduct of electronic communications and interactions. We will act thoughtfully, respectfully, professionally, and with full awareness of information confidentiality and security whenever conducting BMS business or making any reference to BMS or BMS information via any electronic medium, including postings on internal and external social media sites.

BMS Company Policy

Supporting this Section:

BMS-POL-5

Applying Internal Controls

[https://purl.bms.com/
pdhq/e/12282562.pdf](https://purl.bms.com/pdhq/e/12282562.pdf)

The I in Integrity

I am Chris and to me,
**Integrity is the foundation
of trust – it is an
uncompromising commitment
to doing the right thing.**

Chris Boerner, Ph.D.
Executive Vice President,
Chief Commercialization Officer



IMPORTANT CONTACT INFORMATION

Compliance Program

Employees can find additional information through the Compliance & Ethics link on Pulse.

Contacting the BMS Integrity Line

bms.integrity.ethicspoint.com

Integrity line

The BMS Integrity Line is a telephone- and web-based confidential reporting system hosted by Navex Global. Local telephone numbers can be found on the website, bms.integrity.ethicspoint.com, where you can also make a web-based report.

Operators are available 24 hours a day, 7 days a week.

Reports can be made confidentially and anonymously where local law permits and without fear of reprisal. Your comments will be heard.

Data Privacy Restrictions may apply.

Contacting the Corporate Ombuds

Email: ombuds@bms.com

Mail: Bristol Myers Squibb Company
3401 Princeton Pike
Lawrenceville, NJ 08648, USA

Conversations with the Corporate Ombuds are confidential, unless otherwise required by law or to protect public health and safety.

Contacting the Global Privacy Office

Email: global.privacy@bms.com

Reporting an Adverse Event

Reporting Spontaneous Adverse Events: Anyone who works for BMS including employees, contractors, and agents who work on behalf of BMS has a responsibility to recognize and report **Adverse Event*** information to globalsbmsmedinfo.com within **24 hours** or immediately during the next business day of becoming aware of the event. Employees without BMS computer access must report the adverse event to management.

*Adverse Events are defined in detail on the [Bristol Myers Squibb Global Medical Information Resource Center](http://BristolMyersSquibbGlobalMedicalInformationResourceCenter) website.

Reporting Potential Product Counterfeiting, Tampering, Theft or Diversion

Notify local Corporate Security and Quality Representatives within 24 hours.



Managing Travel, Meetings and Expenses

We are committed to the highest standards of ethical behavior related to business travel and expenses.

We ensure accuracy in the reporting of all business expenses.

Travel and Meetings

BMS conducts meetings and reimburses travel for our employees where there is a legitimate business or scientific need to do so. We have procedures in place to assist our travelers in selecting travel, accommodations and meeting venues that balance cost-effectiveness with the safety of travelers and attendees, as well as efficiency in meeting the business or scientific need of the activity.

Business Expenses

BMS is committed to the highest standards of ethical behavior relating to business expenses. All employees are required to use good judgment and only incur or request reimbursement for reasonable and legitimate business expenses directly related to their scope of responsibilities at BMS. Typical business expenses include, but are not limited to, travel, entertainment, office supplies, postage, shipping and handling, and professional

development. Misusing Company funds or falsifying expense reports or records that are submitted as proof of expenses is prohibited and may lead to disciplinary action, up to and including employment termination, where permitted by local law.

BMS Company Policy
Supporting this Section:
BMS-POL-6 Managing Travel, Meetings and Expenses

[https://purl.bms.com/
pdhq/e/12030966.pdf](https://purl.bms.com/pdhq/e/12030966.pdf)

Reality Check: It is Not Acceptable to Falsify Expense Reports

The Facts

As part of a routine audit of expenses submitted through a BMS purchasing management system, Finance discovered that one particular cost code center had a pattern of similar costs that appeared to be initiated by the same employee. The audit showed that the employee made purchases on a daily basis and all of the purchases remained below the dollar amount threshold that would trigger manager approval. The amount of purchases made totaled hundreds of thousands of dollars.

The employee's manager was contacted and stated that he was not aware of the purchases nor did he believe they were legitimate company related expenses. The audit findings were reported to the Integrity Line, and as a result, an investigation was opened to examine the situation.

The Outcome

The investigation revealed that the employee was making purchases on a daily basis for items such as graphing calculators and wireless headphones and then reselling them on Facebook Market Place and eBay for personal gain.

When the employee was first questioned, he was not forthcoming and created an elaborate story about why he was making the purchases. Eventually, the employee admitted that he was making the purchases and then selling the items for personal gain. The employee claimed that he used the money earned through this fraudulent scheme to pay for personal and household bills.

The employee knowingly and deceitfully made purchases on a routine basis using BMS funds and then sold the goods for personal gain and as a result, violated the Principles of Integrity as well as three BMS Policies: BMS-POL-5: Applying Internal Controls; BMS-POL-6: Managing Travel, Meetings, and Expenses; BMS-SOP-6c: Business Expenses. The employee chose to resign from the company. The employee also pled guilty to criminal charges and will be required to reimburse the stolen funds.

The Learnings

All BMS expenses must be aligned with our Principles of Integrity. As stated in BMS-SOP-6c: Business Expenses, "Every employee must manage BMS funds appropriately. Misappropriation of BMS funds... is prohibited and may lead to disciplinary action up to and including termination of employment." To ensure the legitimacy and accuracy of business expenses, the company has systems and processes in place to detect fraudulent activity. Every employee has a responsibility to use good judgement to incur only legitimate business expenses directly related to their scope of responsibilities at BMS.

The I in Integrity

I am David, and to me, anything that costs your Integrity is too costly. It takes a lifetime of good deeds to build a good reputation, and only one bad one to lose it.

David Elkins
Executive Vice President
& Chief Financial Officer



COMPANY POLICY INDEX

All of the following Company Policies are referenced in the Standards of Business Conduct and Ethics:

Policy Number	Policy Title
BMS-POL-1	Protecting Our Patients https://purl.bms.com/pdhq/e/12217467.pdf
BMS-POL-2	Protecting Our Employees https://purl.bms.com/pdhq/e/12282139.pdf
BMS-POL-3	Conducting Our Business https://purl.bms.com/pdhq/e/12289460.pdf
BMS-POL-4	Governing Our Organization https://purl.bms.com/pdhq/e/12218461.pdf
BMS-POL-5	Applying Internal Controls https://purl.bms.com/pdhq/e/12282562.pdf
BMS-POL-6	Managing Travel, Meetings and Expenses https://purl.bms.com/pdhq/e/12030966.pdf

Employees can access the full text of these policies on Pulse or at <https://policies.bms.com>

Summaries of these Policies are available to the general public on bms.com or a paper copy can be obtained by sending an e-mail to complianceandethics@bms.com or a written request to:

Compliance & Ethics
Bristol Myers Squibb Company
3551 Lawrenceville Road
Princeton, NJ 08540, USA



I am Pam, and to me, integrity is integral to inclusive leadership and a culture of belonging. Creating the space to bring together unique experiences and backgrounds will spark innovation to drive the best health outcomes for our patients and communities around the world.

Pamela Fisher
Vice President, Chief Diversity and Inclusion Officer



Reporting Spontaneous Adverse Events:

Anyone who works for BMS including employees, contractors, and agents who work on behalf of BMS has a responsibility to recognize and report **Adverse Event*** information to globalbmsmedinfo.com within **24 hours** or immediately during the next business day of becoming aware of the event. Employees without BMS computer access must report the adverse event to management.

*Adverse Events are defined in detail on the [Bristol Myers Squibb Global Medical Information Resource Center](#) website.

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

INNOVATION

We pursue disruptive and bold solutions for patients

URGENCY

We move together with speed and quality because patients are waiting

PASSION

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

ACCOUNTABILITY

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

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

We commit to scientific excellence and investment in biopharmaceutical research and development to provide innovative, high-quality medicines that address the unmet medical needs of patients with serious diseases. We apply scientific rigor to produce clinical and economic benefit through medicines that improve patients' lives. We strive to make information about our commercialized medicines widely and readily available.

To our employees

We embrace a diverse workforce and inclusive culture. The health, safety, professional development, work-life balance and equitable, respectful treatment of our employees are among our highest priorities.

To our global communities

We promote conscientious citizenship that improves health and promotes sustainability in our communities.

To our shareholders

We strive to produce sustained strong performance and shareholder value.

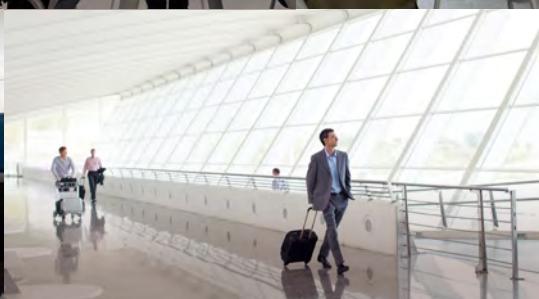
To our environment

We encourage the preservation of natural resources and strive to minimize the environmental impact of our operations and products.



The I in Integrity

As leaders and role models for the organization, sharing personal stories and demonstrating integrity is how we strengthen our culture and help employees put the **'I' in Integrity**.



I am Estelle, and to me,
Integrity is communicating
with transparency and
truth, even when it is
challenging.

Estelle Vester-Blokland
Senior Vice President and Head,
Global Medical Affairs.



I am Elizabeth, and to
me, Integrity is standing
up for and speaking up
for what is right, even
when it is hard.

Elizabeth Mily
Executive Vice President,
Strategy & Business
Development



I am Derica and to me,
Integrity is honoring that
inner voice that always
suggests what is fair,
honest, and just, and doing
what is right even when no
one is looking; it's up to us
to listen.

Derica Rice
Audit Committee Chair,
BMS Board
of Directors



I am Rupert, and to me,
Integrity is maintaining
your principles in an
environment where others
are capitulating.

Rupert Vessey, M.A., B.M.,
B.Ch., F.R.C.P., D.Phil.
Executive Vice President,
Research and Early Development



I am Catalina and to me,
Integrity is doing the
right thing every time
for patients, employees,
communities and suppliers.
For people to speak up
when something is wrong.
The I in Integrity is trust in
what we do, how we do it,
and why we do it.

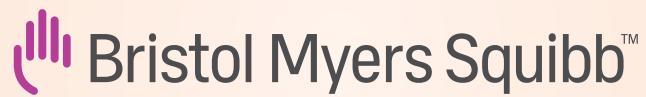
Catalina Vargas
Chief of Staff
to the Chief
Executive
Officer



I am Karin, and to me
Integrity is about cultivating
a culture that values being
honest with each other,
our communities and the
patients we serve.

Karin Shanahan
Executive Vice President, Global
Product Development & Supply





430 E. 29th Street, 14th Floor, New York, NY 10016 • 1-800-332-2056

bms.com

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