

PRINCIPLES OF INTEGRITY

THE BRISTOL-MYERS SQUIBB 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.



Bristol-Myers Squibb

OUR MISSION

To discover, develop and deliver innovative medicines that help patients prevail over serious diseases.

OUR COMMITMENT

To our patients and customers, employees, global communities, shareholders, environment and other stakeholders, we promise to act on our belief that the priceless ingredient of every product is the integrity of its maker. We operate with effective governance and high standards of ethical behavior. We seek transparency and dialogue with our stakeholders to improve our understanding of their needs. We take our commitment to economic, social and environmental sustainability seriously, and extend this expectation to our partners and suppliers.

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.

Dear Colleagues,

As you know, at Bristol-Myers Squibb, we are firmly committed to the highest standards of quality, uncompromising ethics, compliance and integrity. These principles are central to who we are, what we do and how we do it.

We are therefore proud to present our “Principles of Integrity: Standards of Business Conduct and Ethics.” In it, you will find 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.

Clearly, this is an important document that serves as a useful resource for you and your work. Please read it and refer to it as needed.

If you have any questions or concerns, you can always speak with your supervisor or manager. Additionally, if you would prefer, you could utilize the BMS Integrity Line – our 24 hour telephone and web-based confidential reporting system, which is available in your local language. Regardless, it is important to remember that we will not tolerate retaliation against anyone for raising questions or concerns or making a good faith report of possible improper behavior.

Thank you for your commitment to our Principles and to our continued success.

Giovanni Caforio

*Chairman
Chief Executive Officer*



Alan Lacy

*Chairman of the Audit Committee
of the Board of Directors*





Introduction to the Principles of Integrity

Our “Principles of Integrity: 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.

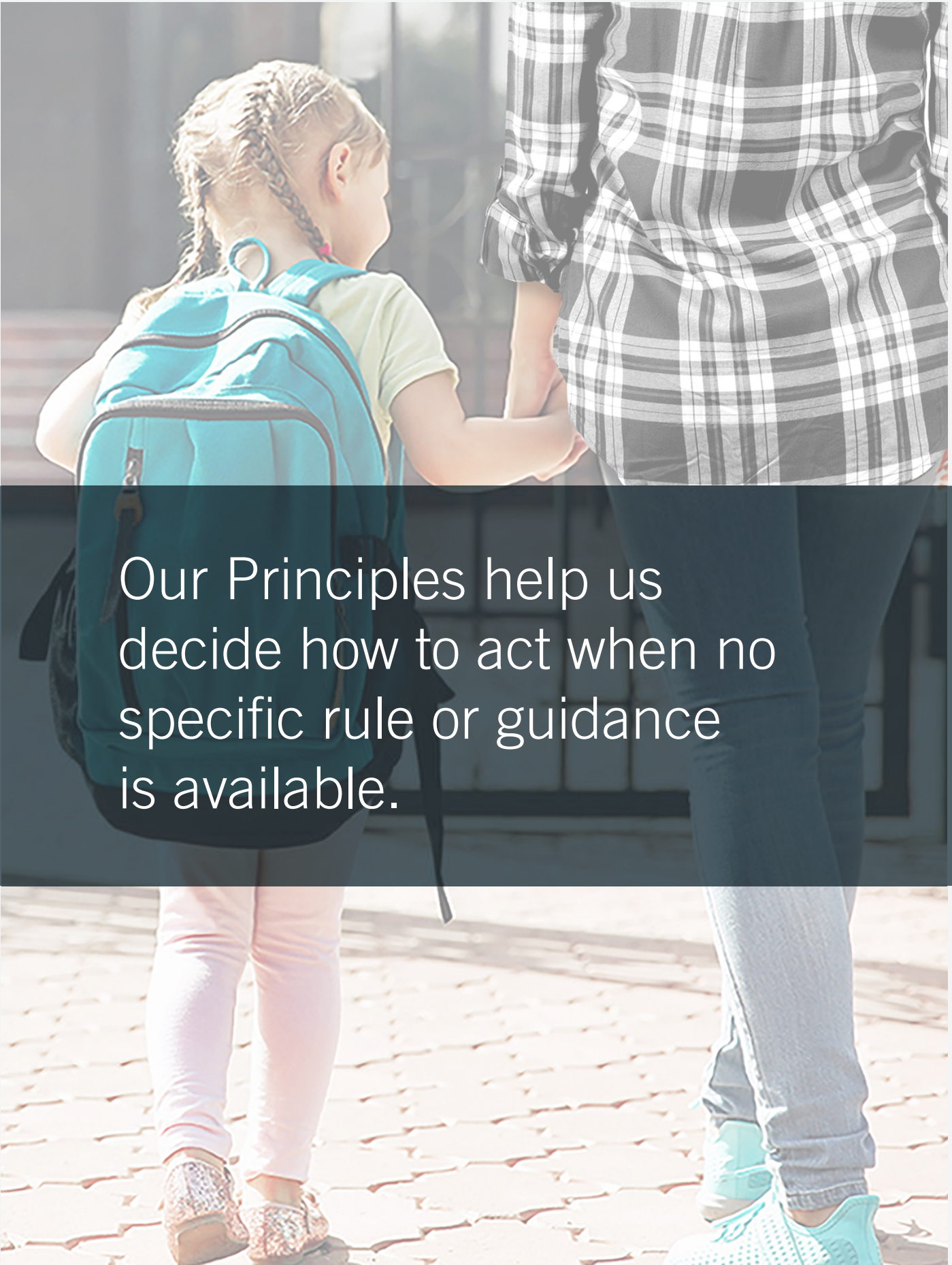
These Principles do not provide a complete explanation of all the laws, regulations, policies and procedures that BMS employees must follow. We face many complex situations every day making it difficult to create a set of rules that are comprehensive enough to cover every situation. Our Principles help 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.

CONTENTS

■ 1. Protecting Our Patients	7
■ 2. Protecting Our Employees	9
■ 3. Conducting Our Business	13
■ 4. Governing Our Organization	17
■ 5. Applying Internal Controls	19
■ 6. Managing Travel, Meetings & Expenses	23
<hr/>	
COMPANY POLICY INDEX	25
<hr/>	
IMPORTANT CONTACT INFORMATION	26



Our Principles help us
decide how to act when no
specific rule or guidance
is available.

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 holds publication of scientific information in the highest regard and supports authors who take responsibility and 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 www.ClinicalTrials.gov.

Quality

We are committed to providing products and services that meet or exceed customer expectations and regulatory requirements, and that are perceived by our customers to be of superior value. We are committed to compliance with global Health Authorities regulations. We fulfill these commitments by:

BMS Company Policy
Supporting this Section:

BMS-POL-1 ↓
Protecting
Our Patients



PROTECTING OUR PATIENTS

- 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;
- ensuring appropriate regulatory and technical training that fosters a quality and compliant culture;
- striving to use the best available quality tools;
- recognizing that we must excel at meeting the needs of our customers;
- taking a personal responsibility for upholding the highest standards of quality, along with legal and regulatory compliance; and
- providing leadership that advocates, recognizes and rewards excellence in quality.

We are committed to an effective Quality System and to the governance structure and resources required for its implementation and maintenance throughout the organization.

Safety Monitoring and Reporting

BMS monitors and evaluates safety data associated with our marketed medicines and our investigational drugs in clinical trials. To ensure we meet our worldwide safety reporting requirements, employees must promptly report any adverse events or other events associated with any of our products, when they become aware of them. 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. Adverse Events can be reported by sending an e-mail or by calling the BMS Call Center. Contact details and the definition of Adverse Events and Other Reportable Events can be obtained by accessing the following link: www.globalbmsmedinfo.com.

Product Surety

Our Company is committed to protecting the integrity of our products and brands from counterfeiting, tampering, theft, or diversion. Employees must promptly report possible instances by notifying Corporate Security and Quality & Compliance representatives, and business unit senior management within 24 hours.

Data Privacy

We respect and diligently protect the personal information to which we have access, regardless of the source, subject, owner, or purpose of the data. 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. Laws concerning data privacy may vary by country. We have a Global Privacy Office and policies to support the protection of personal information in our business operations. If you have questions about the laws concerning data privacy, please contact our Global Privacy Office at global.privacy@bms.com or +1 877-578-4009.

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 or +1 877-578-4009.

BMS Company Policy
Supporting this Section:

BMS-POL-2 ↓
Protecting Our
Employees



A photograph of two men in business attire standing in a modern office environment. The man on the left is Black, wearing a blue blazer over a light blue shirt, and is holding a small folder or tablet. The man on the right is white with grey hair, wearing a dark grey blazer over a light blue shirt, and is gesturing with his hands while speaking. In the background, there is a large screen displaying a video conference with two participants. The office has a clean, professional look with light-colored walls and modern furniture.

Decisions that are
grounded in the Principles
are more likely to be the
right ones.

PROTECTING OUR EMPLOYEES

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; 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.

A man and a woman in business attire are sitting at a table, looking at a tablet together. The man is pointing at the screen. The woman is holding the tablet. They are both looking at the screen with interest. The background is a bright, modern office setting.

We act with honesty and integrity and are encouraged to ask questions when we are unsure.

CONDUCTING OUR BUSINESS

We value BMS'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

We respect the practice of medicine and we support the integrity of the physician-patient relationship. We interact with health care 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 health care 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 health care professionals where required by law.

BMS Company Policy
Supporting this Section:

BMS-POL-3 ↓
Conducting Our
Business



CONDUCTING OUR BUSINESS

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 health care 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 health care 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.

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 health care 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, Health and Safety

We care about the communities where we operate and we conduct our business in an environmentally sustainable manner. We integrate principles of resource conservation, pollution prevention and environmental responsibility into our business processes, facilities, operations, and products. We will cooperate with government, industry, educational institutions, and the public in support of regulations, research and programs that address areas of Environment, Health and Safety (EHS) concern. We consider environmental protection, as well as personal and public health and safety, essential parts of our everyday responsibilities.

Political Activity

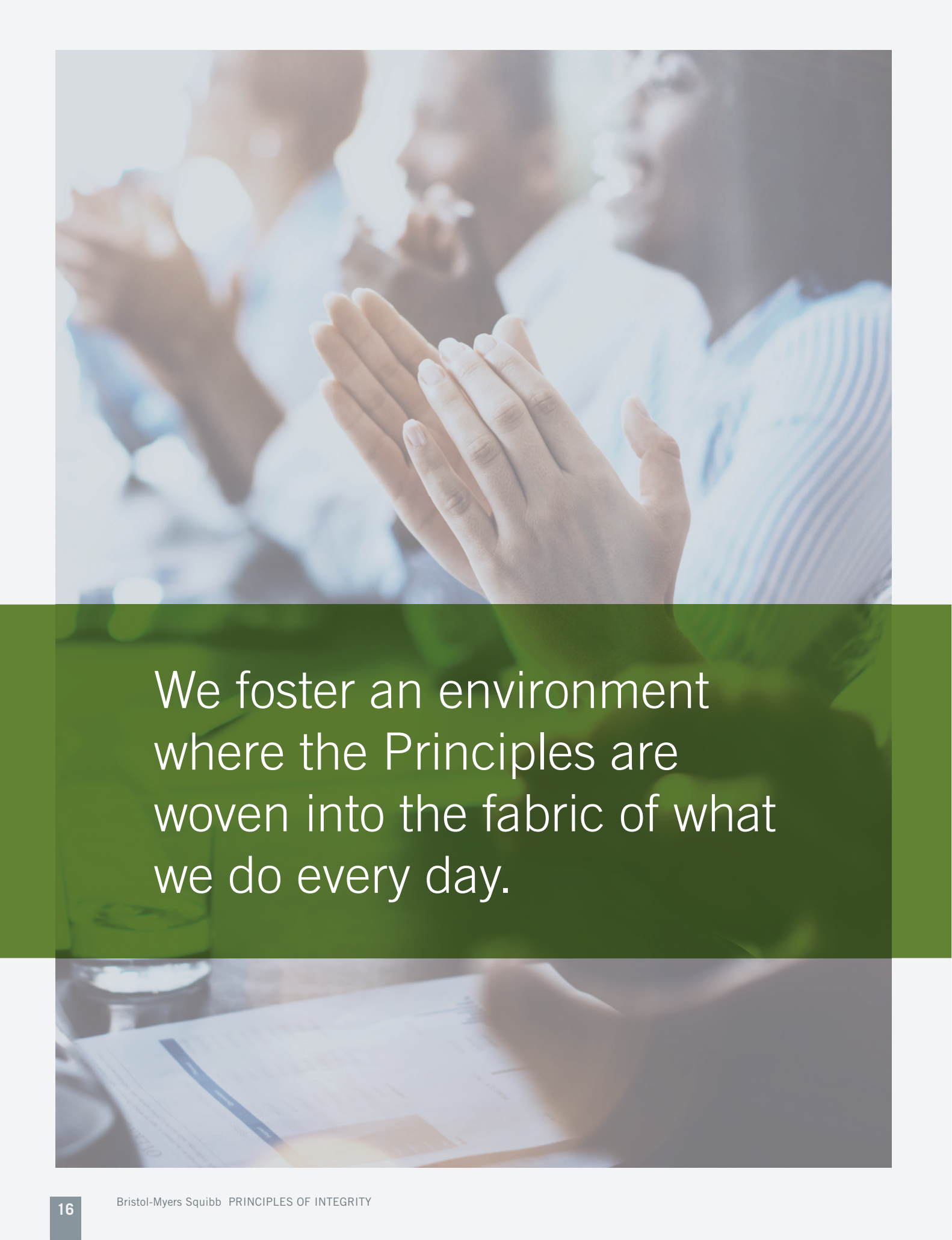
We are encouraged to participate in the political process as individuals and we may volunteer for political purposes, or not, as we choose. We may not use Company time, property, or facilities for personal political activity. The Company also has a government affairs organization that engages in political 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 and Contracts

We purchase goods and services 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 Global Procurement, the Contracts Center of Excellence 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.



We foster an environment
where the Principles are
woven into the fabric of what
we do every day.

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 what 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.

BMS Company Policy
Supporting this Section:

BMS-POL-4 ↓
Governing Our
Organization



GOVERNING OUR ORGANIZATION

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
- a Human Resources or employees' representative
- an appropriate management representative
- an attorney in the Law Department
- Compliance & Ethics
- [The BMS Integrity Line](#)

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 Ombudsman

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 Ombudsman. The Corporate Ombudsman 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 or human resources representative. The Corporate Ombudsman 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.

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

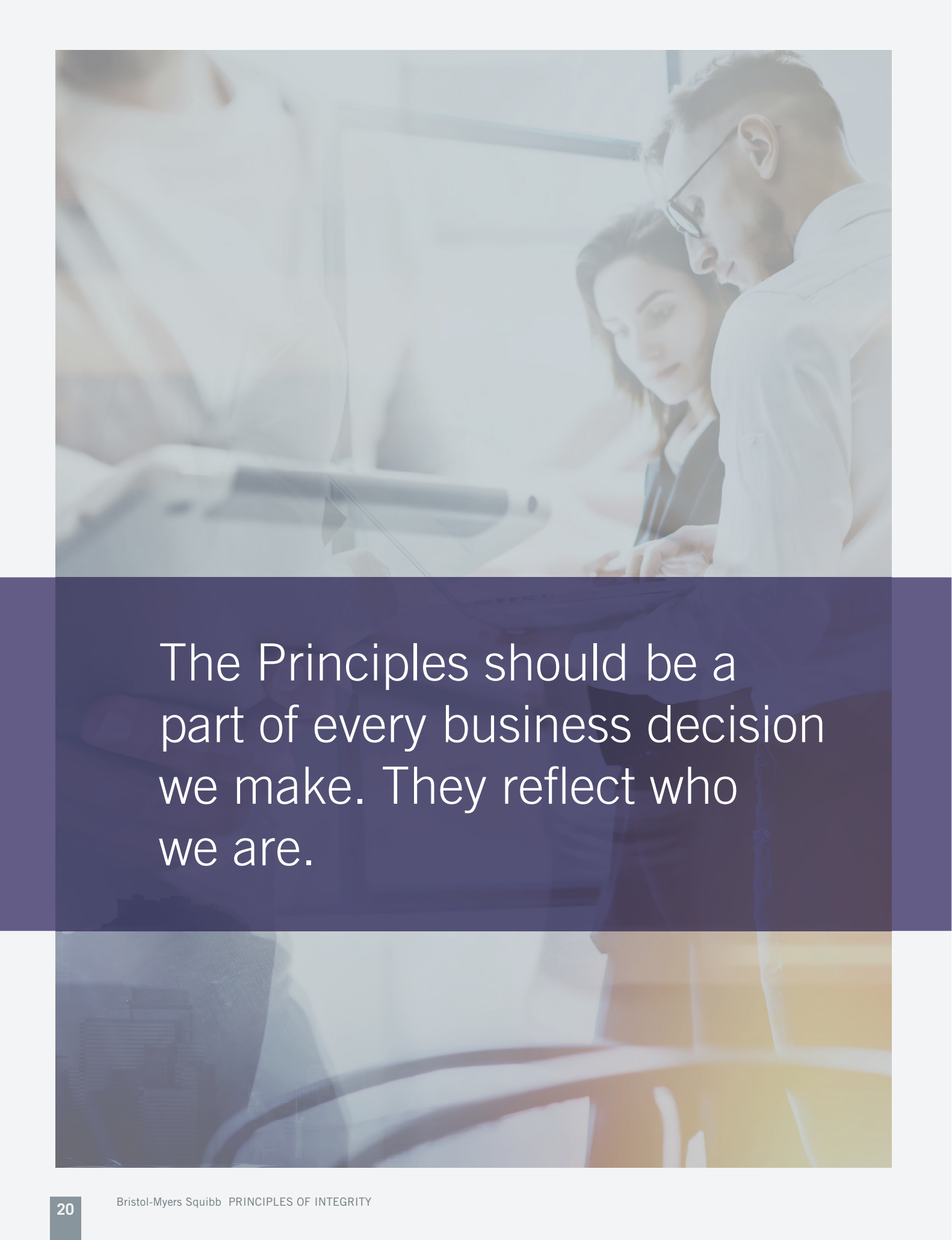
During the course of our work, we may create or learn confidential information about BMS or BMS business partners, suppliers, or customers. To protect the Company's interests, we do not share this sensitive information with anyone inside or outside of BMS who does not have a legitimate business need to know it. In situations where it is appropriate to share such information, we will obtain appropriate approvals

BMS Company Policy
Supporting this Section:

BMS-POL-5 ↓

Applying Internal
Controls





The Principles should be a part of every business decision we make. They reflect who we are.

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 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.

APPLYING INTERNAL CONTROLS

BMS Company Policy Supporting this Section:
BMS-POL-5 [Applying Internal Controls](#)

APPLYING INTERNAL CONTROLS

BMS Company Policy Supporting this Section:
BMS-POL-5 [Applying Internal Controls](#)

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.

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










A woman with blonde hair, wearing a dark blue business suit, is walking on a moving walkway in what appears to be an airport or travel hub. She is carrying a black suitcase in her right hand and a black shoulder bag in her left. The background is a blurred view of the airport interior with curved architectural elements. A semi-transparent teal banner is overlaid across the middle of the image, containing white text.

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

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
 BMS-POL-2	Protecting Our Employees
 BMS-POL-3	Conducting Our Business
 BMS-POL-4	Governing Our Organization
 BMS-POL-5	Applying Internal Controls
 BMS-POL-6	Managing Travel, Meetings and Expenses

CLICK EACH POLICY
TO DOWNLOAD

Employees can access the full text of these policies on BMS360 or at <https://compgps.web.bms.com/companyportal.html>.

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
P.O. Box 4000
Princeton, NJ 08543-4000, USA



IMPORTANT CONTACT INFORMATION

Compliance Program

Employees can find additional information through the Compliance & Ethics link on BMS360.

Contacting the BMS Integrity Line

Web address: www.bms.integrity.ethicspoint.com



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, www.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 Ombudsman

Email: ombudsman@bms.com

Mail: Corporate Ombudsman
Bristol-Myers Squibb Company
P.O. Box 4000 Princeton, NJ 08543-4000

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

Contacting the Global Privacy Office

Email: global.privacy@bms.com

+1 877-578-4009

Reporting an Adverse Event

BMS maintains adverse event reporting hotlines across the globe.

- Contact information is available through the following website: www.globalbmsmedinfo.com
- Employees without BMS computer access: You must report the adverse event to your management

Reporting Potential Product Counterfeiting, Tampering, Theft or Diversion

Notify local Corporate Security and Quality Representatives within 24 hours.



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