

**Integrity
line**

For Reporting of Ethical and Legal Concerns

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



About BMS's Integrity Line

What is the Integrity Line (www.bms.integrity.ethicspoint.com)?

The Integrity Line is BMS's comprehensive 24 hour a day telephone and web-based confidential reporting system hosted by NAVEX.

It is responsible for the following:

- Receiving confidential telephone and web-based reporting of concerns about knowledge or suspicion of illegal or unethical conduct or violations of the BMS Principles of Integrity;¹
- Protecting the identity of reporters who wish to remain anonymous, where permitted under local law;
- Providing translation services in dozens of languages to facilitate reporting in languages other than English; and
- Transmitting information to BMS for investigation, where appropriate.

Why does BMS need the Integrity Line?

We believe that our employees are our most important asset. We are committed to maintaining a work environment where people can ask questions, voice concerns, and make appropriate suggestions regarding business practices. Open communication is vital to the success of our Company. By creating open channels of communication, we can promote a positive work environment and maximize productivity. This helps management and employees work together to address fraud, abuse, or other misconduct in the workplace, while cultivating a positive, ethical and compliant work environment.

The Integrity Line allows BMS to learn about potential misconduct, concerns or questions in situations where employees may not want to make a report internally

¹ Subject to any applicable data privacy restrictions.

or prefer to report anonymously. (Please note: anonymous reporting may be prohibited in some countries and data privacy restrictions may apply.)

Reporting - General

How do I use the Integrity Line to report my concerns?

With the Integrity Line, you may complete a report on the website www.bms.integrity.ethicspoint.com, or you may speak with a specialist in the call center. With either option, you have the ability to report anonymously, if permitted under local law.

What type of situations should I report?

The Integrity Line system is designed for our employees to report concerns about knowledge or suspicion of illegal or unethical conduct, violations of our Principles of Integrity, or any other concerns unless data privacy restrictions apply. If you are not sure if there has been a violation, but you have seen or heard something that just doesn't seem right, you should still file a report. NAVEX can help you prepare the report so that your concerns are appropriately captured.

If I see a violation, shouldn't I just report it to my manager or human resources?

Your first option is to always raise concerns with your manager, Human Resources, the Law Department, Compliance or the Corporate Ombudsman. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue internally, or would like to report anonymously (where permitted under local law), which is why we have partnered with NAVEX. We would rather you report through NAVEX than keep the information to yourself.

Does management really want me to report?

Yes. You know what is going on in our company - both good and bad. You also have an obligation to promptly report information about potential misconduct, including violations of our Principles of Integrity and we encourage you to do so. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive or constructive input may help to improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the Integrity Line's secure server to prevent any possible breach in security. NAVEX makes these reports available only to specific individuals within BMS who are charged with evaluating the reports for follow-up, including where appropriate, investigation.

Isn't this system just an example of someone watching over me?

The Integrity Line system concentrates on being a positive aspect of our overall philosophy, and allows us to provide a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations and maintain a positive reporting environment.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to the Integrity Line is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the Integrity Line's secure website. Many people choose this option, as NAVEX's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and NAVEX's system strips away Internet addresses so that anonymity is totally maintained. Plus, NAVEX is contractually committed not to pursue a reporter's identity.

How does NAVEX maintain confidentiality?

NAVEX does not trace phone calls or use Caller Identification. Website reports come through a secure Internet portal, which does not trace or show user screen names. Further, NAVEX does not generate or maintain internal connection logs containing Internet Protocol (IP) addresses.

No information links your computer to the Integrity Line if you choose to submit a report online.

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the Integrity Line Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section for identifying yourself.

Should I identify myself?

You will be given an opportunity to identify yourself when making a report on the Integrity Line. Disclosing your identity and/or providing contact information can help to expedite an investigation. If you disclose your identity, BMS will strive to protect the confidentiality of your identity to the extent possible, except in cases of bad faith reporting. It is possible, however, that identities become apparent during the course of an investigation.

We understand that in some situations, you may want to file a report anonymously. If you want to do so, and local law permits, the Integrity Line is designed to protect your anonymity. No attempt will be made to determine your identity through electronic or other means.

Whether or not you report anonymously, BMS policy prohibits threats or acts of retaliation against people who, in good faith, provide information regarding potential misconduct.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Our company chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, you have an obligation to the company, yourself and your co-workers to report it.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. NAVEX can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The Integrity Line's system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report on the Integrity Line website or through the call center, you receive a unique user name and are asked to choose a password. You can return to the system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a BMS representative and add further information that will help resolve open issues.

We strongly suggest that you return to the website in the time specified to answer questions. You and BMS now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Can I still file a report if I don't have access to the Internet?

You can file a report on the Integrity Line from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have computers with Internet access. If you choose to use a public computer to file a report, please remember to close out the webpage when you

have completed entering your information to ensure that your information remains private.

You can also call our toll-free hotline, which is available 24 hours a day, 365 days a year. Please visit www.bms.integrity.ethicspoint.com and select the country in which you are located. You will be provided with a toll-free number specific to your country.