PRINCIPLES OF INTEGRITY

BMS Standards of Business Conduct and Ethics
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.
At Bristol-Myers Squibb, our Mission is to discover, develop and deliver innovative medicines that help patients prevail over serious diseases. We keep patients at the center of everything we do. We are committed to excellence and inspired by the BMS tradition that the priceless ingredient in every product is the honor and integrity of its maker.

In our Principles of Integrity, the 2014 BMS Standards of Business Conduct and Ethics, we focus on the Principles that enable all of us at BMS to pursue our Mission in a responsible way, recognizing that we work in a highly-regulated industry with a very complex and competitive marketplace. These Principles are the building blocks for our Policies and Procedures and guide our actions. 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 and environments in which we operate around the world. The Principles should be a part of every business decision we make. They reflect who we are.

Each of us is personally responsible for adhering to these Principles. We encourage you to read them carefully and to ask questions if you are unsure. Together we will pursue our Mission with a steadfast commitment to integrity.

Lamberto Andreotti
Chief Executive Officer

Alan Lacy
Chairman of the Audit Committee of the Board of Directors

Anne Nielsen
Chief Compliance and Ethics Officer
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.
TABLE OF CONTENTS

Keep Patients at the Center of All That We Do  |  5
Conduct Ourselves Appropriately in the Marketplace  |  9
Apply Effective Controls to Our Business Activities  |  13
Maintain a Diverse, Empowered and Highly-Engaged Workforce  |  17
Integrate Compliance and These Principles into Our Culture  |  21
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.

Product Quality

We are committed to providing medicines that meet or exceed customer expectations and regulatory requirements. BMS is committed to compliance with global current Good Manufacturing Practices. We are committed to an effective Quality System and to the governance structure and resources required for its implementation and maintenance throughout the organization. We foster the continuous, proactive improvement of our production and process capabilities and take responsibility for upholding the highest standards of quality for BMS medicines.

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 (as defined in BMS-CP-044) associated with any of our products, when they become aware of them. BMS maintains adverse event reporting hotlines across the globe. U.S. employees: Call +1 866-232-2557 or email: worldwide.safety@bms.com. The contact information in other regions is available through the “Contact Information” link found on the website http://teams.bms.com/sites/GPVE/Pages/Index.aspx under “Reporting an Adverse Event.”

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.
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. When we make specific efficacy claims for our products, the claims will be substantiated and balanced with relevant safety information. We use only approved promotional materials with health care professionals or patients.

Interactions with Health Care 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.

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 at +1 609-897-3383 or +1 877-578-4009.

BMS Corporate Policies Supporting this Section:

BMS-CP-049 Scientific Publications
BMS-CP-030 Animal Care and Use
BMS-CP-014 Quality
BMS-CP-044 Reporting Safety Information for BMS Products
BMS-CP-037 Product Surety
BMS-CP-043 Interactions with Health Care Professionals
BMS-CP-016 Privacy
BMS-CP-006 Computer System Usage and Information Asset Protection
CONDUCT OURSELVES appropriately in the marketplace

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 are essential to maintaining our reputation.
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.

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.

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 Contract 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.
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.

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 (promise, authorize, arrange, provide, request, or agree to receive or accept, directly or indirectly through third parties) any payments, benefits or anything of value to influence decisions, obtain or retain business, or 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.

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.

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.
APPLY EFFECTIVE CONTROLS
to our business activities

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.

Information Asset Protection
We use computers, information systems, the internet, email, 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.

Public Disclosure

BMS will provide accurate and timely information about financial, operational and other matters to investors and government agencies. All reports and documents submitted to the U.S. Securities and Exchange Commission 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, we understand that 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 that has not been made public and 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 certain information must be disclosed and how it is disseminated.

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, 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

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 annual or periodic reports to stockholders, 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 Corporate Secretary or the Law Department if we have questions before buying or selling BMS securities.

BMS Corporate Policies Supporting this Section:

- BMS-CP-017 Management of Direct Customer Product Inventory Levels
- BMS-CP-005 BMS Records Management
- BMS-CP-039 Business Expenses
- BMS-CP-012 Trademarks and Copyrights
- BMS-CP-006 Computer System Usage and Information Asset Protection
- BMS-CP-001 Non-Discrimination and Anti-Harassment
- BMS-CP-071 Public Disclosure of BMS Information
- BMS-CP-010 Disclosure of Material Information
- BMS-CP-007 Securities Trading
MAINTAIN A DIVERSE, empowered and highly-engaged workforce

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.

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.

BMS Corporate Policies Supporting this Section:

- BMS-CP-001 Non-Discrimination and Anti-Harassment
- BMS-CP-002 Substance Abuse Prevention
- BMS-CP-003 Threats and Acts of Violence in the Workplace
- BMS-CP-004 Environment, Health & Safety
- BMS-CP-069 Human Rights
INTEGRATE COMPLIANCE

and these principles into our culture

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.
We are committed to compliance with our own procedural documents, industry codes, and the laws and regulations of the countries where our Company does business. The Principles clarify the responsibilities that we have to each other, to our business partners and suppliers, to our customers, to our shareholders, and to our communities.

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.

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.

Reporting directly to Compliance & Ethics 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.

**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.

**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 investigations. Any disciplinary measure and corrective action will depend on the specific facts and circumstances. Actions contrary to law, our Principles or other corporate 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.

**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.
### CORPORATE POLICY INDEX

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

<table>
<thead>
<tr>
<th>Policy Number</th>
<th>Policy Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>BMS-CP-001</td>
<td>Non-Discrimination and Anti-Harassment</td>
</tr>
<tr>
<td>BMS-CP-002</td>
<td>Substance Abuse Prevention</td>
</tr>
<tr>
<td>BMS-CP-003</td>
<td>Threats and Acts of Violence in the Workplace</td>
</tr>
<tr>
<td>BMS-CP-004</td>
<td>Environment, Health &amp; Safety</td>
</tr>
<tr>
<td>BMS-CP-005</td>
<td>BMS Records Management</td>
</tr>
<tr>
<td>BMS-CP-006</td>
<td>Computer System Usage and Information Asset Protection</td>
</tr>
<tr>
<td>BMS-CP-007</td>
<td>Securities Trading</td>
</tr>
<tr>
<td>BMS-CP-009</td>
<td>Conflicts of Interest</td>
</tr>
<tr>
<td>BMS-CP-010</td>
<td>Disclosure of Material Information</td>
</tr>
<tr>
<td>BMS-CP-011</td>
<td>Fair Competition</td>
</tr>
<tr>
<td>BMS-CP-012</td>
<td>Trademarks and Copyrights</td>
</tr>
<tr>
<td>BMS-CP-013</td>
<td>Purchasing</td>
</tr>
<tr>
<td>BMS-CP-014</td>
<td>Quality</td>
</tr>
<tr>
<td>BMS-CP-016</td>
<td>Privacy</td>
</tr>
<tr>
<td>BMS-CP-017</td>
<td>Management of Direct Customer Product Inventory Levels</td>
</tr>
<tr>
<td>BMS-CP-027</td>
<td>Reporting Potential Compliance Incidents</td>
</tr>
<tr>
<td>BMS-CP-030</td>
<td>Animal Care and Use</td>
</tr>
<tr>
<td>BMS-CP-034</td>
<td>Anti-Bribery</td>
</tr>
<tr>
<td>BMS-CP-037</td>
<td>Product Surety</td>
</tr>
<tr>
<td>BMS-CP-039</td>
<td>Business Expenses</td>
</tr>
<tr>
<td>BMS-CP-040</td>
<td>Contracts with External Parties</td>
</tr>
<tr>
<td>BMS-CP-043</td>
<td>Interactions with Health Care Professionals</td>
</tr>
<tr>
<td>BMS-CP-044</td>
<td>Reporting Safety Information for BMS Products</td>
</tr>
<tr>
<td>BMS-CP-048</td>
<td>Political Contributions</td>
</tr>
<tr>
<td>BMS-CP-049</td>
<td>Scientific Publications</td>
</tr>
<tr>
<td>BMS-CP-058</td>
<td>Disclosure of Federal Lobbying Activities</td>
</tr>
<tr>
<td>BMS-CP-064</td>
<td>Sanctioned Countries, Restricted Parties and Anti-boycott</td>
</tr>
<tr>
<td>BMS-CP-069</td>
<td>Human Rights</td>
</tr>
<tr>
<td>BMS-CP-071</td>
<td>Public Disclosure of BMS Information</td>
</tr>
</tbody>
</table>

Employees can access the full text of these policies on inSite or at [policiesandprocedures.bms.com](http://policiesandprocedures.bms.com).

Summaries of these Policies are available to the general public on bms.com (under Our Company and then Compliance & Ethics) or a paper copy can be obtained by sending an email to [complianceandethics@bms.com](mailto:complianceandethics@bms.com) or a written request to:

Compliance & Ethics  
Bristol-Myers Squibb Company, P.O. Box 4000, Lawrenceville, NJ 08543-4000, USA
Our Compliance Program

Employees can find additional information through the Compliance link on inSite.

Contacting the Compliance & Ethics Helpline
Email: helpline@bms.com
U.S.: +1 800-348-5526
International: +1 212-546-3406
Fax: +1 609-252-6031
Mail:
Compliance & Ethics
Bristol-Myers Squibb Company
P.O. Box 4000
Princeton, NJ 08543-4000

When contacting the BMS Compliance & Ethics Helpline, employees are encouraged to provide contact information which helps our ability to follow up and clarify potential issues. Be assured that confidentiality will be protected. Reports can be made anonymously.

All reports must be made in good faith. Reports not made in good faith can result in disciplinary action, subject to local laws and regulations.

Contacting the Corporate Ombudsman
Please use the same email, telephone or fax numbers as above or:
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
+1 609-897-3383
+1 877-578-4009

Reporting an Adverse Event
BMS maintains adverse event reporting hotlines across the globe.

- U.S. employees: Call +1 866-232-2557 or Email: worldwide.safety@bms.com
- Other regions: The contact information is available through the “Contact Information” link found on the website http://teams.bms.com/sites/GPVE/Pages/Index.aspx under “Reporting an Adverse Event?”
- 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 and Compliance Representatives, and business unit senior management within 24 hours.