

## **Summary of Bristol-Myers Squibb Corporate Policy on Disclosure of Federal Lobbying Activities (BMS-CP-058)**

### **Purpose**

The purpose of this Policy is to establish and communicate Bristol Myers Squibb's highest principles and expectations on the disclosure of lobbyist activities for compliance with the Lobbying Disclosure Act, 1995.

### **Policy Statement**

Bristol Myers Squibb (BMS) believes that it serves an important medical need by making products that extend and enhance human life. In its efforts to pursue its' mission, BMS employs lobbyists who provide information, analysis, and opinion to legislators and government leaders to allow for informed and balanced decision making in regards to healthcare legislation.

BMS and its subsidiaries and affiliates is committed to conducting its business in compliance with federal, state and local laws and regulations that are applicable to their activities, and in a manner that is consistent with the Company's values and ethical standards. Therefore, under the federal Lobbying Disclosure Act (LDA), lobbyists acting on behalf of BMS are required to register with the Secretary of the Senate and Clerk of the House of Representatives to provide full disclosure and full public knowledge and awareness of any lobbyist activities and gift and travel provisions.

The LDA is intended to increase public confidence in the integrity of government by requiring effective public disclosure of the identity and extent of the efforts of paid lobbyists to influence federal officials in the conduct of government actions.

BMS, as a registered lobbying entity, is mandated to file a single quarterly report that discloses each person who is employed by BMS to make a threshold amount of lobbying contacts and activities, with the Secretary of the Senate and the Clerk of the House of Representatives. The quarterly report also discloses the issues being lobbied, the part of the federal government that was being lobbied, and how much was spent on the lobbying.

BMS itself and its in-house lobbyists listed on the quarterly report are also mandated to file a semi-annual report that details various expenses, including FECA (Federal Election Campaign Act) contributions, contributions for certain events honoring, or to organizations connected to, covered officials, and presidential inaugural and library contributions. In addition, BMS on behalf of itself and each in-house lobbyist will certify that he/she/it has read and understands the Rules of the House and Senate relating to gifts and travel provisions and has not knowingly provided, requested, or directed a gift that would violate either House or Senate Rules.

The LDA is administered by the Secretary of the Senate and the Clerk of the House. They do not have authority to investigate or enforce the statute, but may make referrals to the U.S. Attorney for the District of Columbia.

Whoever knowingly fails to (1) correct a defective filing within 60 days after notice of such a defect by the Secretary of the Senate or the Clerk of the House; or (2) to comply with any other provision of the Act, may be subject to a significant civil fine, and whoever knowingly fails to comply with any provision of this Act may be imprisoned or fined or both.

Activities governed by this Policy are to be conducted in accordance with related Corporate Directives and SOPs.

### **Definitions**

**Entity**: Any individual, corporation, company, foundation, association, labor organization, firm, partnership, society, joint stock company, group of organizations, or state or local government.

**Gift**: Any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having monetary value including gifts of services, training, transportation, lodging, and meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

**Lobbyist**: Any individual (1) who is either employed or retained by a client for financial or other compensation (2) whose services include more than one lobbying contact; and (3) whose lobbying activities constitute 20 percent or more of his or her services' time on behalf of that client during any three-month period.

**Lobbying Activities**: Lobbying contacts and efforts in support of such contacts, including preparation and planning activities, research and other background work that is intended, at the time it is performed, for use in contacts, and coordination with the lobbying activities of others.

**Lobby Contact**: Any oral, written or electronic communication to a covered official that is made on behalf of a client.

**Publication Date**: July 2008