

Summary of Bristol-Myers Squibb Corporate Policy on Political Contributions (BMS-CP-048)

Purpose

The purpose of this policy is to provide guiding principles for political contributions made by the Company. The Company makes every effort to comply with the provisions of the Federal Election Campaign Act, the Bipartisan Campaign Reform Act and all applicable state laws regulating the activities of corporations in the political process. Federal law prohibits corporations from making contributions to candidates for federal office, national political parties and most federal political committees. State laws vary as to the permissible activities of a corporation with regard to candidates for state and local offices, political parties and other political committees. The Company makes no political contributions outside of the U.S.

Policy Statement

With respect to political contributions made by the Company, such contributions shall be made consistent with the following principles:

- The purpose of political spending shall be to support the Company's mission to enhance and extend human life, advance the interests of our patients, protect the interests of employees and enhance shareholder value.
- No political contribution will be made by the Company in anticipation of, in recognition of, or in return for an official act.
- All political contributions made by the Company shall be disclosed on a semi-annual basis to stockholders and the general public.
- The Board of Directors shall assume responsibility for overseeing the Company's policy on political contributions.
- Political spending shall be consistent with established Company procedures.

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