

**Bristol Myers Squibb (BMS) Methodology Document
in support of the EFPIA transparency disclosure
code for POs transfers of value pertaining to 2022**

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Introduction

The approach to timing, tax and currency aspects of Transfer of Value (TOV) disclosure are not defined by the EFPIA Code. Companies are free to define an appropriate methodology and are obliged to publish it as per the EFPIA Code, Article 24. BMS, as a member of EFPIA, will fulfill this requirement by publishing this document alongside 2022 PO reports where possible. All data in the disclosure report was correct at time of publication.

Definitions

Recipients

Patient Organisation (PO): non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in Europe.

Patient Organisation Representative: is a person who is mandated to represent and express the collective views of a PO on a specific issue or disease area.

Kind of Transfers of Value (TOV)

1. Transfers of Value to an PO, an amount related to any of the categories set forth below:
 - a. Donations and Grants. Donations and Grants) to organisations or associations which are composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers (governed by Article 12 of the EFPIA Code).
 - b. Contribution to costs related to Events. Contribution to costs related to Events, through POs' or third parties, including sponsorship to Patient Organisation Representative to attend Events, such as:
 - i. Registration fees;
 - ii. Sponsorship agreements with POs or with third parties to manage an Event;
For contributions provided to Events through Professional Conference Organisers (PCOs), TOVs are reported as follows:
 - either in the name of benefitting PO, or
 - in the name of Recipient PCO
 - iii. Travel and accommodation (to the extent governed by Article 10 of the EFPIA Code).
 - c. Fees for Service and Consultancy. Transfers of Value resulting from or related to contracts between Member Companies and POs or POs Representatives under which such organisations or associations provide any type of services to a Member Company or any other type of funding not covered in the previous categories. Fees, on the one hand, and on the other hand Transfers of Value relating to expenses

agreed in the written agreement covering the activity will be disclosed as two separate amounts.

2. Transfers of Value to an POs' Representative:
 - a. Contribution to costs related to Events. Contribution to costs related to Events, such as:
 - i. Registration fees; and
 - ii. Travel and accommodation (to the extent governed by Article 10 of the EFPIA Code).
 - b. Fees for Service and Consultancy. Transfers of Value resulting from or related to contracts between Member Companies and POs' Representatives under which such POs' Representatives provide any type of services to a Member Company, or any other type of funding not covered in the previous categories. Fees, on the one hand, and on the other hand Transfers of Value relating to expenses agreed in the written agreement covering the activity will be disclosed as two separate amounts.
 - c. Fees related to travel visas are not reportable

Disclosure's scope

TOV Timing Approach

1. Assumptions
 - a. Timing of a TOV determines assignment to a disclosure period and the date required for value calculations (e.g. currency conversion, tax calculation)
2. Principles
 - a. As actual values are relevant for disclosure reporting, the following dates are captured and transferred to the BMS reporting solution
 - i. Financial Payments: Actual payment date
 - b. Above dates will be used for both:
 - i. assigning any TOV to the relevant disclosure period
 - ii. performing any TOV value calculations
 - c. Multi-year contracts: reporting of TOV related to the contract follow the above rules.

Reportable date

The following rules have been used for the reportable dates relating to TOV in BMS.

- In Kind (travel, accommodation, registration fees) : Event start date
- In Cash (sponsorship, donation, fee for service) : Payment date

Cross-border activities

Where a TOV is made outside of the recipient's country the TOV will be reported within the country disclosure report based on the recipient's principal practice address.

Date of publication

Disclosure will be made within six months after the end of the reporting period.

Disclosure platform

BMS will publish the disclosure report on Company's own website. This methodological note will be attached to this section

Disclosure financial data

TOV Currency Approach

1. The disclosure report in any country will be submitted in the local currency of that country
2. Principles
 - a. No currency conversion or translation is needed, if the transaction currency is the same as the one of the recipient's country of practice (e.g. domestic payments)
 - b. Otherwise currency conversion is required:
 - i. the value of transaction currency is used for a currency conversion as follows:
 1. Financial Payments: the average daily rate of the payment date is used for conversion
 2. Transfer of Value: the average daily rate of the interaction date is used for conversion

VAT

BMS discloses the full amount of all Transfers of Value exclusive of VAT. In exceptional circumstances, VAT may not be separable; in these cases, VAT has been included in the disclosure amount..