OUTREACH MANUAL FOR THE TRANSPARENCY AND BUSINESS ETHICS PROGRAM

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1 INTRODUCTION

The compliance manual of the Transparency and Business Ethics Program-TBEP of Bristol Myers Squibb de Colombia S.A. aims to disseminate the Company's Principles and Policies regarding the management of the risk of Corruption and/or Transnational Bribery C/ST. In doing so, we want to make employees, partners, customers, suppliers, contractors and citizens in general aware of their purposes, so that they can direct their efforts to its application.

For Bristol Myers Squibb de Colombia S.A., a policy is a guideline that governs the actions of a person or area in a given matter. Our policies correspond to the general statement of principles that represent the Company's position for a defined area and that, once adopted, become non-negotiable and mandatory guidelines of behavior.

Each of Bristol Myers Squibb de Colombia S.A.'s employees understands that their behavior has a direct impact on the Company's reputation. The obligation as a member of Bristol Myers Squibb de Colombia S.A. is to understand, apply and frame its behavior in the policies set forth in this document.

2 TBEP COMPLIANCE POLICIES

2.1 Policy for the management and prevention of corruption and/or transnational bribery C/ST

The Operating Committee and Senior Management of Bristol Myers Squibb de Colombia S.A. expressly express their commitment to the implementation of procedures to identify, detect, prevent and mitigate risks related to corruption and/or transnational bribery C/ST in relation to all the Company's operations or businesses, where a national or foreign public official may intervene. To comply with the above, it will carry out the following actions:

- To provide the economic, human and technological resources required by the Compliance Officer for the development of its work.
- Establish an anonymous whistleblowing channel that allows employees, contractors or other third parties to report any red flags or situations related to corruption and/or transnational bribery C/ST.
- Promote the anonymous whistleblowing channel of the Superintendence of Companies and the Secretariat of Transparency so that employees, contractors or other third parties can report any warning signs or situation related to corruption and/or transnational bribery C/ST.

- Develop policies and procedures aimed at mitigating the conflict of interest between collaborators, associates, contractors and other counterparties, which could encourage or facilitate the commission of acts of corruption and bribes to national or foreign public officials.
- Execute the pertinent administrative and legal actions against the Company's administrators and employees when any of the above violates the provisions of the transparency and business ethics program.
- Lead a proper communication strategy to ensure the dissemination of compliance policies and the transparency and business ethics program among employees, associates, contractors and the general public.

2.2 Corporate Anti-Bribery and Corruption Policy

Bristol Myers Squibb de Colombia S.A. has corporate policy BMS-OCD-3aS1 Compliance Standards with the American FCPA Practices Act and the BMS-SOP-3a Anti-Bribery and Anti-Corruption Compliance procedure, both of which establish the following principles against prohibiting making illegal payments or providing anything of value to illegally obtain, retain, or gain advantage in a business:

- Principle 1: Illegal payments.
- Principle 2: Government officials.
- Principle 3: Record-keeping and internal accounting controls.
- Principle 4: Non-BMS Entities.
- Principle 5: Reporting potential violations and red flags.
- Principle 6: Anti-bribery compliance program.

The above principles are available to all contributors in the "BMS Policies" (policies.bms.com) and apply to all officers, directors, and employees of BMS and its subsidiaries and affiliates worldwide, as well as to all agents, consultants, alliances, and other third parties working for and on behalf of BMS.

2.3 Due diligence policy

Bristol Myers Squibb de Colombia S.A. has the Corporate Policy BMS-OCD-3aS1 Standards of Compliance with the US Act of Practices FCPA and the procedure BMS-SOP-3a Anti-Bribery and Anti-Corruption Compliance which establishes in its Principle 4: Entities outside BMS, the necessary requirements to ensure that through the due diligence process the Organization establishes relationships only with third parties that share the same commitment to operate in accordance with the highest standards of legality and integrity.

In addition, the Company will guarantee that due diligence is carried out through collaborators or third parties specialized in this task, ensuring at all times that they have sufficient human and technological resources to carry out periodic reviews on the legal, accounting and financial aspects related to the businesses or transactions carried out with counterparties assessed with a critical C/ST risk profile, to identify and assess the risks of corruption and/or transnational C/ST bribery that may affect the Organization, its subordinate companies and contractors.

In favor of the above, it has defined the following guidelines:

- Any activity of linking or contracting with natural or legal persons, which involves payment or exchange of assets of money or kind, in any capacity, must be carried out in accordance with the provisions of this manual and the Company's SAGRILAFT manual.

- Incorporate in the agreements entered into with the different natural or legal persons, clauses as a mechanism for preventing the risk of corruption and/or transnational bribery C/ST, with the aim of giving legal support to the unilateral termination of the contractual relationship, when the other party is formally linked by the authorities to investigations for the crimes of corruption and/or transnational bribery C/ST.

2.4 TBEP Compliance Audit Policy

Bristol Myers Squibb de Colombia S.A. it will ensure that systematic, critical and periodic reviews are carried out about the proper execution of the Company's transparency and business ethics program.

The insurance body appointed by the company must include in its audit programs a specific program for verifying the processes and controls related to the prevention and control of compliance risks, in order to measure the effectiveness of each and every one of the stages and elements of the system.

On the results and conclusions of this work, said Agency must submit reports to the Compliance Officer, who, in turn, will start the necessary corrective actions. Likewise, the other bodies will be informed about the results of the review of the TBEP.

2.5 Organization's accounting due diligence policy

Bristol Myers Squibb de Colombia S.A. has Corporate Policy FIN-OCD-008596 Accounting Review Checklist of the Department of Finance and the BMS-SOP-3a Anti-Bribery and Anti-Corruption Compliance procedure which establishes in its Principle 3: Maintenance of internal accounting records and controls, keep books, records and accounts that accurately reflect the company's transactions with reasonable detail. BMS also maintains a system of financial controls that is designed to ensure that transactions are executed appropriately by managerial authority, and that they are audited periodically. BMS Individuals who interact directly or indirectly with Government Officials, Government Instrumentalities, and any affiliated person or entity, are responsible for contributing to the maintenance of accurate records and internal accounting controls.

In addition, the Company will request the Statutory Auditor's Office to include in its audit plans, verify the accuracy of the accounting and ensure that in the transfers of money or other assets made by the Organization, direct or indirect payments related to corruption and/or transnational bribery C/ST are not hidden.

2.6 Policy on Payment of Remuneration to Health Care Professionals and Health Care Organizations

Bristol Myers Squibb de Colombia S.A. has the BMS-SOP-3b procedure - Interactions with health professionals and health organizations, which establishes the Company's principles and requirements to ensure that in its interactions with health professionals and health organizations they comply with the highest ethical, integrity and transparency standards and comply with all applicable laws and regulations.

Principle 3: Hiring Health Care Professionals and Health Care Organizations to Provide Services to BMS, specifically defines that the Company exclusively contracts with health care professionals and health care organizations to provide legitimate services to it for legitimate business purposes. The description of the services to be provided and the corresponding compensation must be included in a written contract between the parties, prior to any of the services being provided. All compensation for services rendered to BMS must be set at fair market value.

2.7 Policy on gifts and payments for entertainment and invitations offered by employees to health professionals and health organizations

Bristol Myers Squibb de Colombia S.A. has the BMS-SOP-3b procedure - Interactions with health professionals and health organizations, which establishes the following principles and requirements of the Company to ensure that in its interactions with health professionals and health organizations they comply with the highest ethical, integrity and transparency standards and comply with all applicable laws and regulations.

Principle 2 – Hospitality Provided to Health Care Professionals: In favor of legitimate commercial and scientific interactions, BMS sets conditions for providing reasonable and modest travel, accommodation, meals, and other hospitality during interactions with health care professionals, when appropriate and allowed by local regulations.

Principle 6 – Gifts and items of medical utility: BMS does not provide gifts to healthcare professionals and health organizations regardless of value. Likewise, the conditions for the delivery of items that are not considered gifts according to local regulations are established.

2.8 Policy on gifts, payments for entertainment and invitations granted to collaborators and associates.

Bristol Myers Squibb de Colombia S.A. in its procedure BMS-SOP-3e- Conflicts of Interest, sets forth the Company's principles and requirements with respect to the obligation of its employees to avoid situations that present or create the appearance of a potential Conflict of Interest, to recuse themselves if presented with an actual or potential Conflict of Interest, and to obtain approval before engaging in any activity that could result in an actual or potential Conflict of Interest.

Principle 4: Gifts, Entertainment, Gratuities, and Other Favors states that BMS employees should never provide or accept gifts, entertainment, gratuities, or other favors that may influence or give the appearance of influencing their career decisions unless:

1. The gift is of face value (i.e., less than the equivalent of $25); and
2. does not intend, or others may perceive to intend, to improperly influence business decisions; and
3. complies with all applicable laws and regulations, as well as all BMS policies and procedures.
4. Entertainment or hospitality enables a business or educational conversation; and
5. be by virtue of a genuine business relationship; and

6. is not intended or perceived by others to be intended to improperly influence business decisions; and
7. is permitted by an applicable industry code, law, or regulation and is permitted under BMS policies and procedures; and
8. is not excessive in value or quantity; and
9. it would not create a reputational risk.

2.9 Sponsorship Policy

Bristol Myers Squibb de Colombia S.A. has the procedure BMS-SOP-3b- Interactions with health professionals and health organizations, which establishes in its Principle 4: Support of individual medical education of HCP, the guidelines for providing financial support to health professionals to attend third-party scientific congresses, preceptorships and other promotional and non-promotional medical education opportunities for training. The information provided in this activity should complement the participant's medical education, for example, by covering topics about which they have no knowledge, and should be relevant to their professional responsibilities.

Any invitation extended by Bristol Myers Squibb de Colombia S.A. to a national or foreign public servant to events sponsored by the Company, shall not be understood as a proposal conditioned on the latter performing, omitting or delaying a procedure under his or her charge.

In all cases, the objective of the invitation to the events described in the previous paragraph, to national or foreign public servants, must be to strengthen their knowledge in the different topics associated with the corporate purpose of the Organization. Likewise, any invitation must be made in good faith.

2.10 Donation Policy

Bristol Myers Squibb de Colombia S.A. has the BMS-SOP-3p procedure, Support for Grants, Donations and Corporate Sponsorships, which establishes the following principles and expectations of the Company regarding the submission, review and approval of corporate donations provided to eligible organizations.

Principle 1.1 - Overview of Corporate Donations: BMS shall not offer or supply anything of value to any third party for the intended or perceived purpose of unlawfully obtaining, keeping or generating an advantage in the business, including prescribing, recommending or purchasing the Company's products. In addition, it will always consider reputational risk when providing corporate donations, including, among other things, a suitable place where the requested activity is carried out.

Principle 2.1 - Charitable donations: Charitable donations are only made to organizations that could accept them under local laws and regulations to support the organizations' overall mission.

Principle 2.4 - Product Donations: The Company provides its approved products free of charge as a form of donation to organizations that have access to a population of patients with an expressed need.

Principle 2.5 – Asset Donations: BMS recognizes that even if they are no longer of use to the company, its assets could have value to nonprofits for research, educational, health, humanitarian, or other mission-oriented uses and can therefore be donated.

2.11 Policy on Political Contributions

For the Company, "Political Contributions" means the delivery of sums of money, objects with pecuniary value or other economic benefit in favor of a political party, political candidate or political campaign.

The policy of Bristol Myers Squibb de Colombia S.A. Political Contributions is that employees and shareholders are not authorized to give, offer or promise contributions of any nature to political parties, political campaigns, or third parties publicly or privately linked to them, on behalf of the Company.

However, the collaborators and associates of Bristol Myers Squibb de Colombia S.A. they may, from their personal sphere and in a private capacity, make Political Contributions. In such a case, they must bear in mind at all times that they are collaborators or associates of Bristol Myers Squibb de Colombia S.A. and that, therefore, their actions may be confused with those of the Company, for which reason they must take all necessary and advisable measures to avoid it being understood that their political activism directly or indirectly compromises Bristol Myers Squibb de Colombia S.A.
Due to the above guidelines, they will be considered as activities not authorized by Bristol Myers Squibb de Colombia S.A. to its collaborators and associates, the following:

- Use Company goods, services, or equipment and the time of your workday to make or support your personal political contributions.
- To arrange with the Company for the return or total or partial recognition of their political contributions.

The due diligence policies described in this manual will be applied to the beneficiaries of political contributions.

2.12 Documentation Maintenance Policy

In order to guarantee the highest degree of collaboration with state control entities, Bristol Myers Squibb de Colombia S.A. It will keep the following documents and records related to the Transparency and Business Ethics Program, for a term of ten (10) years:

- The approval by the Operating Committee and Senior Management of the policies of the transparency and business ethics program, as well as those corresponding to the approval of the adjustments or modifications made to said policies.
- The instructions or manuals that contain the processes through which the approved policies and procedures of the transparency and business ethics program are put into practice.
- The reports submitted by the TBEP.
- The reports submitted by the Statutory Auditor on the operation of the Program.
- Records of the training given to the Company's personnel on the transparency and business ethics program.
- The Company's Integrity Principles.
- The minutes of the Operating Committee where the presentation of the reports of the Compliance Officer and the Statutory Auditor is recorded in the corresponding periodicity.
- Documents related to the due diligence carried out for the hiring of Contractors, Intermediaries, business partners and third parties.
- Proof of payments to contractors, brokers, sponsorships, gifts, and other permitted and approved expenses.
- The certificates that support donations and political contributions.

2.13 Policy for updating and amending the Transparency and Business Ethics Program - TBEP

The Company establishes as a policy the review and updating of the Program at least once (1) every two years, considering the needs of the Organization, the new developments that are carried out and the changes in the regulations issued by the control and surveillance bodies.

The modifications made must be approved by the Operating Committee and senior management.

3 INTERNAL REPORT OF AN ANTI-ETHICAL EVENT

If it is observed or known that any of the collaborators, partners, contractors and persons, have engaged in any behavior that goes against the principles and ethical values of the Organization, or the prevention of the risk of Corruption and/or Transnational Bribery C/ST as well as any other corrupt practice, these must be reported through any of the communication channels provided by the Organization:

- Email from the TBEP Compliance Officer, immediate boss, Human Resources or the General Manager.
- Format GSC-FRM-CO-009-04 Report of Attempted, Unusual Operations or Report of Absences**.**
- Anonymous reporting channels located on the Organization's website: https://secure.ethicspoint.com/domain/media/en/gui/36153/report.html

The reports will be confidential, will be kept anonymously and will be handled with the understanding that the person who reports the case does so in good faith and not maliciously, seeking to harm others. Investigations will be carried out applying the principle of presumption of innocence, which means that the person being reported will be considered innocent until proven guilty.

4 REPORT OF EXTERNAL DENUNCIATION OF TRANSNATIONAL BRIBERY

In addition to the internal reporting channels indicated in the previous paragraph of this manual, the company's employees, administrators, shareholders and contractors may make use of the reporting channels provided for the general public by the Superintendence of Companies and the Secretariat of Transparency to inform these Entities of any fact or situation related to the alleged conduct of transnational bribery or acts of corruption.

Complaints made through this channel may be anonymous and when this is not the case, they must be treated confidentially by this Entity.

It is important to note that these complaints may lead to the initiation of an administrative sanctioning process for transnational bribery conduct by the Superintendence of Companies against a legal person or branch of a foreign company when there is merit for it.

To make a report on conduct associated with Transnational Bribery, you can use the following link:

https://www.supersociedades.gov.co/es/web/asuntos-economicos-societarios/canal-de-denuncias-por-soborno-transnacional

To make a report on conduct due to acts of corruption, you can use the following link:
https://portal.paco.gov.co/

5 SANCTIONING REGIME

This manual, which contains policies that must be observed in all the Company's transactions, has been designed in accordance with the laws of the Republic of Colombia, observing the different applicable regulations defined by the Superintendence of Companies. It is a formal invitation to promote and reinforce the obligation to do things correctly, it helps to ensure that the Policies are fully understood, their compliance is mandatory for each and every one of the Company's partners and collaborators.

It is the responsibility of each of the Organization's partners and collaborators to ensure strict compliance with legal provisions and internal rules and procedures. Permissive behavior in the violation of rules by the boss or superior must not exist.

The partners and collaborators of the commercial processes, supply management, human talent management and internal control assurance, in their daily activities must evaluate the degree of compliance with the Policies and provisions described herein, in order to detect deviations, and inform the Compliance Officer to take the necessary corrective measures and, if necessary, apply the sanctions that may arise.

The application of the sanctioning regime, derived from the occurrence of irresponsible, permissive, negligent, inefficient or omission actions and attitudes in the commercial and operational development by any manager, collaborator or third party that affects the Company, said regime consists of the application of the provisions of the Internal Work Regulations approved by the Highest Corporate Body and which is fully known to each and every one of the collaborators.

The sanctions and disciplinary actions that may be applicable will take into account each specific situation and depend on the seriousness of the infraction. In any case, in order to graduate the sanctions, the Company's directors will be consulted to ensure that the measures taken are fair, impartial and guarantee the protection of the rights of our employees and the Organization.