

High Level Guidelines for Corporate Giving: Grants, Giving and Corporate Sponsorship Support

Purpose

At Bristol-Myers Squibb, we are firmly focused on our Mission to discover, develop and deliver innovative medicines that help patients prevail over serious diseases. We are committed to supporting quality initiatives to make a difference in people's lives through Corporate Giving.

The purpose of this document is to describe our principles that BMS uses to review requests for Corporate Giving.

Corporate Giving includes funds or in-kind Support (products, assets or services) provided by BMS to eligible third-party organizations for educational, healthcare-related, scientific, community, public policy, patient advocacy or charitable purposes. Some examples are charitable donations to non-profit organizations, support of medical education programs, corporate sponsorships, fellowships, and corporate memberships.

Corporate Giving Principles

BMS provides Corporate Giving in compliance with our Principles of Integrity, applicable laws, regulations and industry codes of conduct.

- BMS provides Corporate Giving to organizations where we do not have control over the activity for which the funding or In-Kind Support will be used.
- BMS provides funding only to eligible institutions or organizations. Funding is not provided to individuals or physician groups.
- BMS requires that our funding provided to support a request be acknowledged publicly.

Corporate Giving Requirements

- BMS Corporate Giving is generally made to organizations that have a not-for-profit status. Exceptions include for-profit organizations requesting for Independent Medical Education support.
- BMS will not provide funding to support the start up or establishment of a non-profit organization.
- BMS will review the overall financial support of an organization as a factor in our funding decision.
- BMS will not provide funding to support an organization's specific day-to-day operational expenses, such as salaries or rent.
- BMS will not fund requests through Corporate Giving from lobbying organizations.
- As part of our due diligence, BMS will request the names of an organization's Board of Directors and/or Principals to make sure that these individuals do not appear on applicable exclusion lists.
- Before BMS will fund a request, we require a written agreement with the requesting organization.
- BMS will provide payment for an approved request only to the requesting organization.

- BMS will not provide funding to support an event that has already occurred.
- BMS will not provide funding to support entertainment or recreational activities.
- BMS complies fully with financial transparency laws and industry codes associated with Corporate Giving.