



# Standards of Business Conduct and Ethics for Third Parties

The Standards of Business Conduct and Ethics for Third Parties (the Standards) apply to all parties with whom BMS has transactions, including but not limited to suppliers, providers of contingent workers, distributors, consultants, agents, service providers, logistics providers, joint ventures; and co-promotion, research, or licensing partners (Third Parties).



# Message from the Chief Compliance and Ethics Officer

All business activities at Bristol Myers Squibb (BMS) stand firmly on the foundation of our commitment to ethics, integrity and compliance with all applicable laws, regulations, guidelines, and industry codes. BMS is also dedicated to the highest standards of ethical behavior and to economic, social, and environmental sustainability.

The Standards of Business Conduct and Ethics for Third Parties (The Standards) apply to all third-party companies with whom BMS has agreements, such as suppliers, distributors, consultants, agents, service providers, joint ventures, co-promotion and research or licensing partners. We recognize that Third Parties have an important role in our success and strive to conduct business only with Third Parties who share our commitment to these standards. Our Third Parties are expected to have processes and/or systems in place to support operating in compliance with all applicable laws, regulations, guidelines, and industry codes.

## Integrity line

BMS offers an Integrity Line for employees and Third Parties to ask questions or report concerns related to potential violations of the The Standards. Third Parties will be provided anonymity, if requested and to the extent possible in a specific situation, where local law permits. BMS has

taken steps to prevent caller identification through phone system technology. Third Parties who choose to identify themselves are assured that BMS will not retaliate in any manner against individuals who make reports in good faith. BMS will review and investigate reported concerns raised by our Third Parties.

To report any concerns, local telephone numbers can be found at [bms.integrity.ethicspoint.com](https://bms.integrity.ethicspoint.com), where you can also make a web-based report. Thank you for your commitment to the The Standards.



**Kim Jablonski**  
Senior Vice President, Chief Compliance & Ethics Officer

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## Our Commitment...

To our patients and customers, employees, global communities, shareholders, environment, and other stakeholders, we promise to act on our belief that the priceless ingredient of every product is the integrity of its maker. We operate with effective governance and high standards of ethical behavior. We seek transparency and dialogue with our stakeholders to improve our understanding of their needs. We take our commitment to economic, social, and environmental sustainability seriously, and extend this expectation to our partners and suppliers. As a responsible corporate citizen, we seek to actively improve the health of the communities where we live, work, and serve. Around the globe, we promote health equity and seek to promote the health outcomes of populations disproportionately affected by serious disease. We believe our inclusive culture supports better outcomes for all patients and we value diverse backgrounds, experiences, and perspectives in all aspects of our business in order to help us deliver on our global mission.



### ...to Our Patients and Customers

We commit to scientific excellence and investment in biopharmaceutical research and development to provide innovative, high-quality medicines that address the unmet medical needs of patients with serious diseases. We apply scientific rigor to produce clinical and economic benefit through medicines that improve patients' lives. We strive to make information about our commercialized medicines widely and readily available. We actively seek to improve access to care, advocate for policies that promote health equity, and help medically underserved patients access and afford the medicines they need.

### ...to Our Employees

Inclusion and belonging are core to how we do business. The health, safety, professional development, work-life balance, equal employment opportunities and respectful treatment of our employees are among our highest priorities. We commit to ensuring our colleagues feel valued for their unique perspectives and have opportunities for development and advancement based on our performance driven culture.

### ...to Our Suppliers

We believe in the positive economic impact of an inclusive, business-driven approach that encompasses all suppliers. We are committed to working with suppliers who offer the highest level of quality, expertise and experience, partnering with purpose to discover, develop and deliver medicines that help the patients and communities we serve.

### ...to Our Shareholders

We strive to produce sustained strong performance and long-term shareholder value.

### ...to Our Environment

We encourage the preservation of natural resources and strive to minimize the environmental impact of our operations and products.



Learn more about BMS's Environmental, Social and Governance (ESG) strategy.

## Our Mission

To discover, develop and deliver innovative medicines that help patients prevail over serious diseases.

## Our Vision

To be the world's leading biopharma company that transforms patients' lives through science.

## Our Values

### INTEGRITY

We demonstrate ethics, integrity and quality in everything we do for patients, customers and colleagues

### INNOVATION

We pursue disruptive and bold solutions for patients

### URGENCY

We move together with speed and quality because patients are waiting

### PASSION

Our dedication to learning and excellence helps us to deliver exceptional results

### ACCOUNTABILITY

We all own Bristol Myers Squibb's success and strive to be transparent and deliver on our commitments

### INCLUSION

We lead with the value of inclusion and foster an environment where we can all work together at our full potential

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# Diversity in Business Relationships

Doing work that matters is our passion. So is creating an environment that celebrates diversity of thought, experience and background. A culture based on fairness and respect doesn't stop with our employees, it extends to our Third Parties. We're committed to working with Third Parties that honor and support an inclusive approach to how we consider and value our employees and the communities where we live and work.

We recognize that diverse talents and perspectives are vital to achieve success, particularly as our company reaches out to serve the needs of all our patients. We look to obtain high quality goods, services, and materials from companies that reflect our own global value of inclusion. Third Parties should do the same.

We advocate for developing sustainable business relationships and partnerships with qualified small businesses and companies in distressed communities with high unemployment rates and low median household incomes, to encourage economic development to make a positive difference.

**We're committed to working with Third Parties that honor and support an inclusive approach to how we consider and value our employees and the communities where we live and work.**



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# I. Business Conduct and Ethics

Third Parties shall conduct their business ethically and in compliance with laws, regulations, guidelines, and industry codes.

## Anti-Bribery and Corruption

Prohibit all forms of bribery and corruption and require compliance with [Anti-Bribery and Anti-Corruption laws](#). Prohibit the payment, receipt, offer, or solicitation of any item of value, directly or indirectly, to or from any recipient (including both private citizens and entities and [Government Officials](#)) to improperly influence a business decision, prescribing behavior, or a [Government Official](#)'s action or inaction, regardless of local customs or practices.

Establish and maintain effective systems to prevent bribery and corruption and follow applicable laws.

## Fair Competition

Conduct business in compliance with applicable fair competition and anti-trust laws, and fair business practices.

## Confidentiality

Ensure that confidential or proprietary information related to any aspect of BMS's business is not disclosed to the public or to third parties who are not authorized to receive that information. Do not communicate or disclose externally BMS's prospects, performance, policies, or [Confidential Information](#) that could affect the price of BMS [Securities](#).



## Marketing and Promotional Practices

Maintain high ethical, medical, and scientific standards, and follow all applicable laws, regulations, guidelines, and industry codes in all marketing and promotional materials and activities.

## Interactions with Healthcare Professionals, Healthcare Organizations, or Patients

Conduct interactions with [Healthcare Professionals](#), [Healthcare Organizations](#), or patients on behalf of BMS in an ethical manner and in compliance with applicable laws, regulations, guidelines, and industry codes.



**BMS is committed to conducting business in compliance with international anti-bribery and anti-corruption (ABAC) laws and standards.**

## Pharmaceutical Laws

Ensure awareness of and follow applicable laws and regulations relating to the pharmaceutical industry. Specifically, follow good manufacturing practices, good clinical practices, good laboratory practices, and all other customary and relevant good practices and requirements.

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# I. Business Conduct and Ethics

## Data Privacy and Security

Ensure the protection of [Personal](#) and/or [Confidential Information](#), by promoting the responsible and ethical management of [Personal](#) and/or [Confidential Information](#), implementing appropriate security measures, adhering to industry-leading standards and applicable laws to safeguard against [Data Breaches](#), and report any [Data Breach](#) pertaining to BMS [Personal](#) and/or [Confidential Information](#) to [cyber.operations@bms.com](mailto:cyber.operations@bms.com).

### What are examples of Personal Information?



Examples may include, but are not limited to, name, address, email address, social security number or other country identifier, driver's license number, bank account information, or credit card information, and in some instances, a patient identifier.

## Trade

Follow all applicable import and export controls, sanctions, and other trade compliance laws of the country(ies) where the transaction(s) occur(s), or which may otherwise have jurisdiction over the transaction.

## Animal Welfare

Treat animals humanely, with pain and stress minimized. Perform animal testing after consideration to replace animals, reduce the numbers of animals used or refine procedures to minimize distress. Use alternatives wherever scientifically valid and acceptable to regulators.

## Voluntary, Prior and Informed Consent

Ensure the voluntary, prior, and informed consent in writing of any persons who participate as subjects in scientific and medical experimentation, product testing or as donors of tissues, cells, organs, and any other body parts for research purposes.

## Patient Safety and Access to Information

Ensure that adequate management systems are in place to minimize the risk of adversely impacting the rights of patients, including their rights to health and to access information directly.

## Conflicts of Interest

Take reasonable care to avoid and manage [Conflicts of Interest](#). Notify all affected parties if an actual or potential [conflict of interest](#) arises.

## Corporate Records

Create and maintain accurate and complete business records and supporting details in accordance with applicable laws and regulations.

## Intellectual Property

Protect intellectual property against loss, theft, or other misuse and respect the intellectual property rights of other third parties.



## Scientific and Research Integrity

Conduct research and development with uncompromised ethical integrity and consistent with applicable laws, regulations, and practice guidelines, including but not limited to Good Laboratory Practices, Good Clinical Practices, Good Animal Welfare Practices, and all other customary and relevant good practices.

## Artificial Intelligence

Use [Artificial Intelligence](#) in a responsible and ethical way that is inclusive, safe, protects against bias, respects the privacy of [Personal Information](#), provides transparency, and empowers humanity.



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## II. Human Rights and Labor

Third Parties shall uphold the human rights of workers and treat them with respect and dignity, in their own operations, supply base and business relationships.

### Freely Chosen Employment

Make recruitment practices cost free, with no fees to the applicant and do not withhold personal documentation from the applicant or employee during or after the recruitment process. Everyone has the right to work, to free choice of employment, and to just and favorable conditions<sup>1</sup>.

### No Child Labor

Prohibit the use of child labor. Engage young workers under the age of eighteen only in non-hazardous work, and only if permitted by local laws and regulations, and consistent with international labor standards.

### Non-Discrimination and Fair Treatment

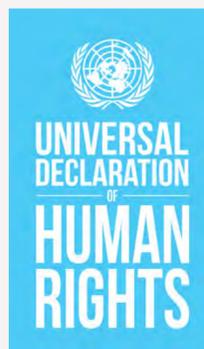


Provide a workplace free from harassment and **Discrimination** and implement policies and reporting procedures, that are communicated to workers. **Discrimination** for reasons such as gender, race, color, religion, national origin, age, physical or mental disability, pregnancy, citizenship, status as a covered veteran, marital status, sexual orientation, gender identity and expression, or any other characteristic protected by law is not allowed. Provide a workplace that is free of human rights abuses, including sexual harassment, sexual abuse, corporal punishment, excessive force, mental or physical coercion, and verbal abuse, or threats of such actions. Document and communicate to workers that disciplinary measures are free from the stated abuses.



<sup>1</sup> United Nations Universal Declaration of Human Rights, Article 23

BMS fully recognizes the universal human rights framework, notably the [United Nations Universal Declaration of Human Rights](#) (UDHR), which address equality of all human beings; right to life, liberty, and security; personal freedom; and economic, social, and cultural freedoms. Third Parties are expected to respect these human rights, in accordance with the principles established under the [United Nations Guiding Principles on Business and Human Rights](#). To the extent a Third Party becomes aware of any violation (actual or suspected) of the Standards by parties within its own direct operations or in its supply chain, it shall immediately inform BMS through the Integrity Line.



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## No Forced Labor and Human Trafficking

Prohibit forced, bonded, enslaved, compulsory, indentured or involuntary prison labor, and do not engage in any form of modern slavery or [Human Trafficking](#).

## Wages, Benefits and Working Hours

Pay workers according to applicable wage laws, including minimum wages, overtime hours, and mandated benefits, as stated in employee or collective bargaining agreements, that employees have record of and access to. Communicate with workers promptly, the basis on which they are being compensated, and the wages to be paid for such overtime via a pay slip or equivalent record. Make overtime voluntary and in compliance with national and international standards. Maintain a reliable, transparent system for registering working hours, including overtime, and required breaks.



## Freedom of Association and Collective Bargaining

Respect the rights of workers, as local laws require, to associate freely, join or not join labor unions, seek representation, and join workers' councils. Allow workers to communicate openly with management about working conditions without threat of reprisal, intimidation, or harassment. Provide grievance mechanisms for workers to raise concerns anonymously without fear of reprisal.



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Third Parties shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment.

### Environmental Authorizations

Follow all applicable environmental laws, regulations, guidelines, and industry codes. Obtain all required environmental permits, licenses, information registrations and restrictions, and follow operational and reporting requirements. Report any environmental concerns or potential incidents involving BMS product or operation to BMS immediately.

### Waste and Emissions

Maintain systems to ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Manage, control, and treat any waste, wastewater, or emissions with the potential to adversely impact human or environmental health before release into the environment. Know direct emission sources and make efforts to transition to low or no emission energy sources.

### Spills and Releases

Maintain systems to prevent and mitigate accidental spills and releases to the environment. Act on any spills or releases with the appropriate corrective and preventive actions.

### Environmentally Responsible Practices



Assess environmental risks periodically or as required by law. Ensure preventive and continuous improvement measures are in place including conserving natural resources, avoiding the use of hazardous materials and where possible, reduce, reuse, or recycle.

### Resource Use

Take measures to improve efficiency and reduce the consumption of resources.

### Sustainable Sourcing and Traceability



Complete due diligence on the source of critical raw materials to promote legal and sustainable sourcing. Implement measures to reduce the risk of environmental and human rights risks in the value chain.

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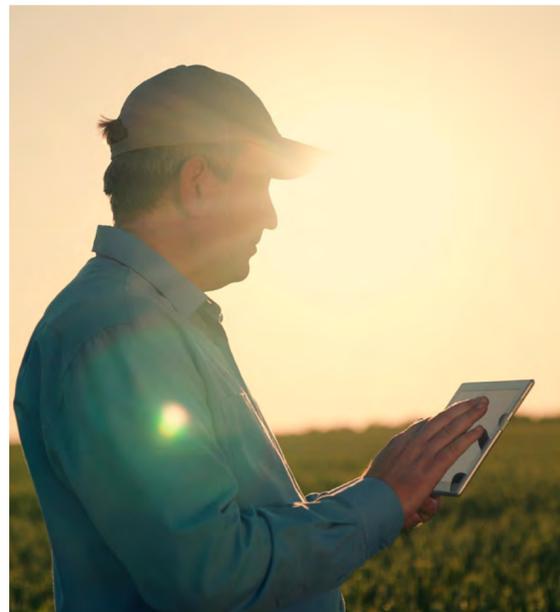
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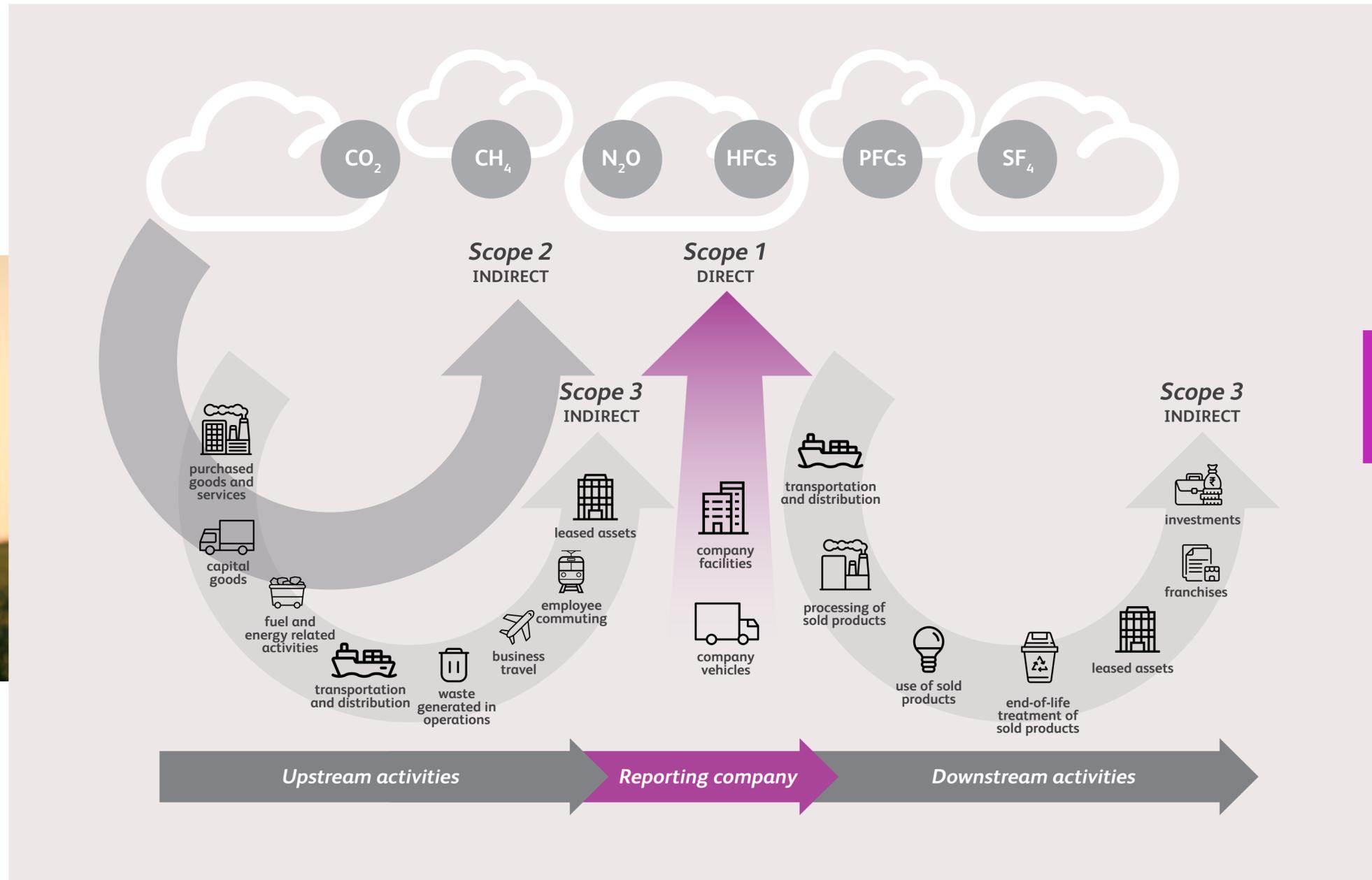
## Decarbonization

Account for and disclose the environmental footprint in operations. Take measures to reduce Greenhouse Gas Emissions, both from direct sources (Scope 1 & 2) and indirect sources (Scope 3).



## Local Communities

Respect the rights of local communities living and working around worksites, including the right to a clean and healthy environment.



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## B. Health & Safety

Third Parties are expected to provide a safe and healthy working environment, including any living quarters that are provided by the Third Party.

### Worker Protection

Assess occupational health & safety risks and take preventive or corrective actions to address those risks. Establish routines to protect workers from overexposure to chemical, biological, and physical hazards in the workplace. Report, track, and act on safety hazards.



Liability/accident insurance is in place at worksites to cover workplace related injuries and illnesses. Report fatalities, if any, related to the BMS supply chain to BMS.

Personal Protective Equipment (PPE), if required, is in good working order, properly addresses the identified risk and is provided free of charge to employees.

### Process Safety

Implement programs to prevent or mitigate catastrophic releases of chemicals.

### Emergency Preparedness and Response



Identify and assess emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures. Document and communicate emergency plans to workers. Emergency evacuation routes are well signed to ensure quick evacuations.

Workers trained in first-aid or emergency response are available during all operating hours. Health and safety equipment onsite fits the facility's size and risk, meets legal requirements and is always available.

### Hazard Information



Provide safety information relating to hazardous materials including pharmaceutical compounds and pharmaceutical intermediate materials to educate, train and protect employees from hazards.



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Third Parties shall employ management processes that help ensure compliance with these Third-Party Standards.

## Commitment and Accountability

Demonstrate commitment to the concepts described in these Third-Party Standards by allocating proper resources.

## Risk Management

Implement mechanisms to monitor and manage [risks](#) in all areas addressed by these Standards including [risks](#) posed by their own Third Parties.

## Legal and Customer Requirements

Identify and comply with applicable local laws, regulations, and relevant customer requirements, and follow applicable guidelines and industry codes.



## Reporting Concerns

Ensure that legally compliant reporting systems are in place and employees are encouraged to report concerns or potential illegal activities in the workplace without fear of [Retaliation](#), intimidation, or harassment. Investigate reports and take corrective action, if necessary.



## Fraud Prevention and Reporting

Implement robust [Fraud](#) prevention and reporting programs. Report promptly to BMS any potential [Fraud](#) involving BMS business, regardless of materiality.

# Integrity line

The BMS Integrity Line is a reporting system available in multiple languages and open 24 hours a day, seven days a week. Reports can be made confidentially and anonymously where local law permits and without fear of [retaliation](#).



If you are aware of a potential violation of local law, regulations, or these Standards you have an obligation to report the issue.

Visit BMS [Integrity Line](#) to learn more, [file a concern or report](#) a potential ethical or legal violation.



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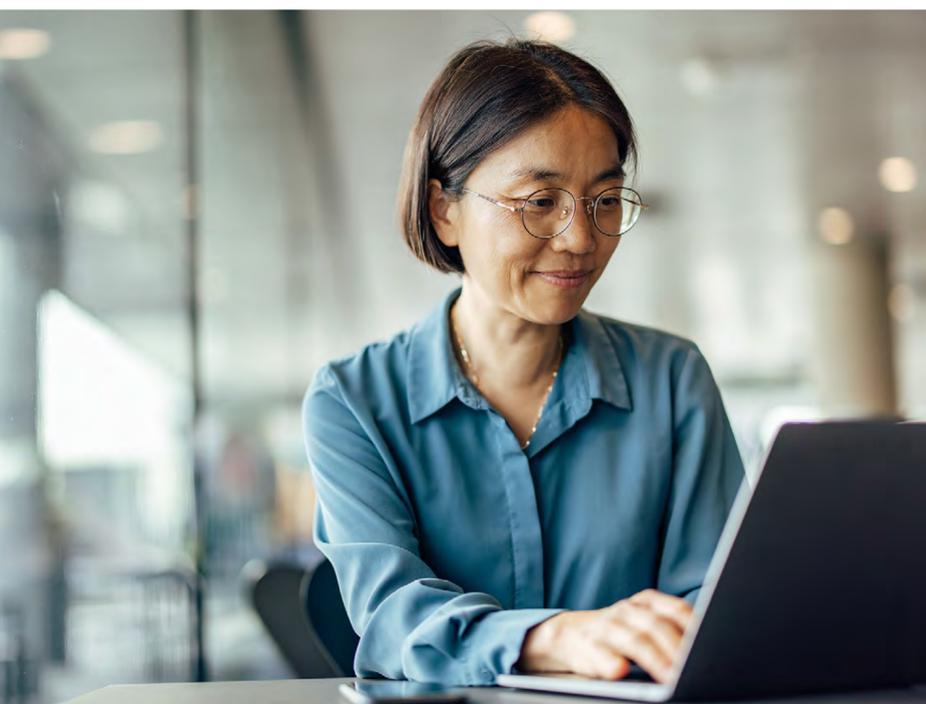
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### Documentation

Maintain documentation that shows compliance with these Standards and applicable laws, regulations, guidelines, and industry codes.

### Training and Competency

Establish a training program that achieves knowledge, skills and abilities in management and workers to address the expectations in these Standards.



### Continuous Improvement

Continuously improve the internal control environment by proactively establishing objectives, implementing plans, and taking appropriate corrective actions for any deficiencies identified by internal or external assessments, inspections, or management reviews.

### Business Continuity

Develop and implement [Business Continuity](#) plans for operations supporting BMS business. Design plans and keep them current to promptly recover and restore partially or completely interrupted critical functions to minimize disruption to BMS business and protect BMS's reputation.

### Communication

Establish effective systems to communicate these Standards to workers, contractors, and Third Parties.



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# V. Quality Systems

Third Parties shall provide high quality goods and services on-time and in compliance with all applicable regulations.

## Change Control

Prohibit (including sub-suppliers) any changes in specification, part design, material, manufacturing process, manufacturing location, or registration status, for any goods that BMS will purchase, without prior written approval from BMS.



## Quality / Delivery Performance

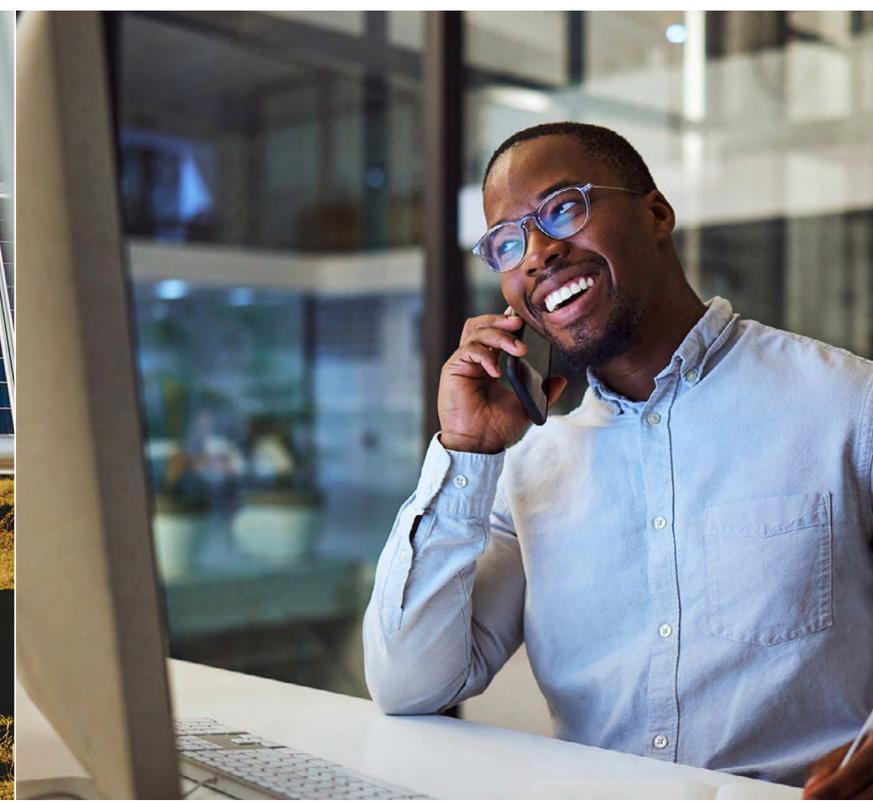
Ensure on-time delivery following BMS requirements. Monitor product quality performance and demonstrate continuous improvement measured by decreased internal defects, customer complaints, and defects shipped. Take proactive measures to prevent supply disruptions, including implementing CAPA processes. Maintain the capability to respond promptly to all complaints issued by BMS.

## Quality System

Demonstrate leadership accountability for establishing a company-wide commitment to quality by maintaining a Quality Policy, deploying a quality management system, and obtaining appropriate product registrations and licensures that follow all applicable government regulations in the countries in which their products are produced and/or distributed.

## Packaging / Labeling

Identify product with proper label information, ensuring no misidentification will occur and allowing for complete traceability.



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# BMS Standards of Business Conduct and Ethics Applicable to BMS Employees when interacting with Third Parties

In addition to these Standards, BMS has **Principles of Integrity: Standards of Business Conduct and Ethics**, for its own employees, which detail the fundamental principles that all BMS employees must follow in their work and which Third Parties who interact with BMS employees must understand and follow. The BMS Principles of Integrity can be found here: [Principles of Integrity & Business Conduct - Bristol Myers Squibb \(bms.com\)](https://www.bms.com/principles-of-integrity).

## Conflicts of Interest

BMS employees may not take part in activities or situations that present an actual, potential, or perceived [Conflict of Interest](#). A [Conflict of Interest](#) may exist when you have a personal or business relationship with a person or entity other than BMS which could influence your judgment when making decisions on behalf of BMS.

## Gifts, Entertainment, Hospitality, Gratuities, and Other Favors

BMS employees must never provide or accept [Gifts](#), entertainment, gratuities, or other favors that might influence, or appear to influence, their professional decisions. Accepting [Gifts](#), entertainment, [Hospitality](#), gratuities, or other favors from entities with which BMS does business may pose a [conflict of interest](#) by implying an obligation on behalf of BMS and as such cannot be accepted except under limited circumstances.

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# Pharmaceutical Supply Chain Initiative (PSCI)

BMS is a member of the Pharmaceutical Supply Chain Initiative (PSCI), which is a group of pharmaceutical and healthcare companies who share a vision of excellence in safety, environmental, and social outcomes in the communities where we buy. PSCI believes that by sharing knowledge and expertise, PSCI members can work as one voice to drive complex, global change more effectively than any one organization alone. The BMS Standards of Business Conduct and Ethics for Third Parties aligns with the [PSCI Principles](#) for Responsible Supply Chain Management.

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## Anti-Bribery and Anti-Corruption Laws (ABAC Laws)

All applicable anti-bribery and anti-corruption laws and regulations, whether foreign or domestic, local, or national, including the U.S. Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act.

## Artificial Intelligence

AI, or Artificial Intelligence, refers to a field of computer science focused on developing systems that can perform tasks traditionally requiring human intelligence. It involves simulating human cognitive abilities like perception, learning, reasoning, and decision-making.

## Business Continuity

Prepares the organization to continue operations during an incident by building resilience to threats via proactive planning, exercising, and risk mitigation.

## Child Labor

Work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development. It refers to work that:

- Is mentally, physically, socially, or morally dangerous and harmful to children; and/or
- Interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

Whether or not particular forms of “work” can be called “child labor” depends on the child’s age, the type and hours of work performed, the conditions under which it is performed, and the objectives pursued by individual countries. The answer varies from country to country, as well as among sectors within countries.

*As defined by the International Labour Organization*

## Confidential Information

Information which is highly sensitive, and its use should be limited on a need-to-know basis. Information that, if improperly disclosed or distributed, could harm BMS intellectual property rights or otherwise cause significant damage to BMS. It includes but is not limited to documentation, data, material, records, both physical and electronic, relating to or associated with BMS’ products, business, or activities, including but not limited to financial information; data or statements; trade secrets; product research and development; existing and future product

designs and performance specifications; marketing plans or techniques; schematics; customer lists; computer programs; and processes. It may also include information received from a third party.

## Conflict of Interest

A Conflict of Interest exists when private interests, including personal, social or Financial Interests, interfere in any way with a Third Party’s performance of responsibilities to, or on behalf of, BMS. Among other instances, a Conflict of Interest can arise if a Third Party takes actions that can make it difficult to perform duties on behalf of BMS objectively, or if improper personal benefits are received.

## Data Breach

A breach of security that impacts the ability to deliver goods or services to BMS or the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to BMS Personal and/or **Confidential Information** in the possession, custody, or control of the Third Party, its Affiliates, and their respective directors, officers, employees, agents, subcontractors, and representatives.

## Discrimination

**Discrimination** is the unequal treatment of an employee or applicant in any aspect of employment, based solely or in part on the employee’s, or applicant’s, Protected Characteristic, including their perceived Protected Characteristic. **Discrimination** includes unequal treatment based upon the employee’s or applicant’s association with a member of these protected classes. **Discrimination** may include, but is not necessarily limited to, hostile or demeaning behavior toward applicants or employees because of their Protected Characteristic; allowing the applicant’s or employee’s Protected Characteristic to be a factor in hiring, promotion, compensation, evaluation, advancement, assigned duties or other employment-related decisions unless otherwise permitted by applicable law; and providing unwarranted assistance or withholding work-related assistance, cooperation, and/or information to applicants or employees because of their Protected Characteristic.

## Fraud

Any intentional or deliberate act to deprive another of property or money by guile, deception, or other unfair means.

## Gifts

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.

## Government Official

A person who is an officer, employee, or agent of (1) a national, regional, or local government and their departments and agencies, (2) a public international organization or political party, or (3) a state-controlled or state-owned business or enterprise such as a hospital, university, or pharmacy (see Government Instrumentality). Government Officials also include members of royal families who have government duties as well as persons, or relatives of persons, who are candidates for public office or who otherwise act for or on behalf of a government entity or Government Official. Healthcare Professionals (HCP) who work for non-U.S. public (meaning government funded) hospitals, universities, institutions, or Healthcare Organizations (HCO) generally are considered Government Officials for purposes of the FCPA. In certain cases, providing a payment or anything of value to a relative of a Government Official is the equivalent of providing anything of value directly to the Government Official.

## Healthcare Organizations (HCO)

Any organization employing one or more HCPs for the purpose of diagnosing or treating patients; or scientific/learned societies or other organizations whose activities include:

- Providing direct treatment to patients
- Purchasing or acting as an intermediary to purchase or deliver pharmaceutical products; or
- Establishing or advocating defined therapeutic protocols.

## Healthcare Professionals (HCP)

Any person with prescribing authority or who is otherwise in a position to influence or recommend the prescription, purchase, or use of BMS products. This includes, but is not necessarily limited to, physicians, nurses, physician assistants, pharmacists, and members of formulary committees. For purposes of the Standards, **Healthcare Professionals** also includes non-clinical researchers who provide consulting services.

## Hospitality

Accommodations, travel arrangements, meals, beverages

## Human Trafficking

The recruitment, transportation, transfer, harboring, or receipt of people through force, fraud, or deception, with the aim of exploiting them for profit.

*As defined by the United Nations Office on Drugs and Crime*

## Personal Information

**Personal Information** is also called Personal Data or Personally Identifiable Information. It is any information that directly or indirectly identifies a living Individual, also called a Data Subject. **Personal Information** may include, but is not limited to, information relating to patients, consumers, physicians, BMS or BMS’s customers, employees, personnel, shareholders, suppliers, consultants, and competitors. **Personal Information** may be verbal or recorded in any form or medium and collected by BMS or a third party on BMS’s behalf and/or disclosed to a third party. Personal Data includes the following, without limitation: (a) An individual’s name, address, phone number, e-mail address, Social Security number or other country identifier, driver’s license number, bank account information, or credit card information, and in some instances, a patient identifier (b) All information, data and materials, including without limitation, demographic, medical and financial information that relate to the past, present, or future physical or mental health or condition of an individual; the provision of healthcare to an individual; or the past, present or future payment for the provision of healthcare to an individual.

## Retaliation

**Retaliation** is any adverse employment action taken against any individual because that person has, or is believed to have, reported behavior they believe, in good faith, constituted prohibited **Discrimination** or Harassment or otherwise assisted with any investigation into alleged **Discrimination** or Harassment.

An “adverse employment action” is conduct or an action that materially affects the terms and conditions of an individual’s employment status or is reasonably likely to deter the person from engaging in protected activity.

## Securities

Broadly defined to include common and preferred stock, options, bonds, notes, warrants and other equity, debt and derivative instruments, security-based swaps.

Introduction

Business Conduct and Ethics

Human Rights and Labor

Environment, Occupational Health, Safety &amp; Sustainability

Governance and Management Systems

Quality Systems

BMS Standards of Business Conduct and Ethics for BMS Employees

Pharmaceutical Supply Chain Initiative (PSCI)

Definitions



## Standards of Business Conduct and Ethics for Third Parties

The **Standards of Business Conduct and Ethics for Third Parties (the Standards)** apply to all parties with whom BMS has transactions, including but not limited to suppliers, providers of contingent workers, distributors, consultants, agents, service providers, logistics providers, joint ventures; and co-promotion, research, or licensing partners (Third Parties).



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We set the bar high for corporate ethics at BMS. For the sixth time, BMS has earned the Compliance Leader Verification.