

**Annual Declaration Pursuant to  
California Health and Safety Codes §§ 119400-119402**

At Bristol-Myers Squibb, "...our commitment to integrity and ethical conduct is the foundation of everything we do." Our Compliance & Ethics Program is designed to uphold the highest standards of transparency and accountability, ensuring that our actions reflect our core values. We believe in fostering a culture of ethical behavior where all employees feel empowered to raise concerns. This is essential to our mission of transforming lives through science. BMS recognizes that by providing multiple avenues for reporting and proactively identifying and addressing risks, we promote a culture of transparency, accountability, and continuous improvement. Together, we can ensure that our actions reflect our unwavering commitment to defining what is possible for the patients we serve. To help put this commitment into action, the company has established a comprehensive compliance program (CCP) structured around the seven elements outlined in the April 2003 "Compliance Program Guidance for Pharmaceutical Manufacturers," published by the United States Department of Health and Human Services, Office of Inspector General (OIG Guidance).

BMS's CCP is designed to prevent and detect violations of law or company policy. It is BMS's policy that all employees must comply with applicable laws and regulations, as well as with company policies. However, as acknowledged by the OIG Guidance, implementing a CCP cannot guarantee that improper employee conduct will be eliminated in its entirety. If BMS becomes aware of violations of law or company policy, the matter will be investigated and, if appropriate, disciplinary action will be taken, and corrective measures will be implemented to prevent future violations.

This Declaration is effective as of May 22, 2025, for the January 1, 2024, through December 31, 2024, declaration period. The CCP is intended to be a dynamic program to meet BMS's unique compliance needs in an evolving regulatory landscape. Therefore, BMS will assess its CCP at least annually.

A copy of this Declaration may be obtained by calling the toll-free number 1-800-332-2056.