

## **2026 Annual Description of Comprehensive Compliance Program Pursuant to California Health and Safety Codes §§ 119400-119402**

### **A. Introduction**

On or before May 22, 2026, and in compliance with the annual declaration requirement under California Health and Safety Code §§119400 - 119402, Bristol-Myers Squibb Company (BMS) made its 2025 declaration for the twelve (12) month period covering January 1, 2025 through December 31, 2025.

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's 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.

Below is an overview of BMS's CCP. As described by the OIG Guidance, this program was designed to fit BMS's unique compliance needs. BMS continuously assesses the effectiveness of its CCP to enable it to implement necessary adjustments or refinements.

### **B. Overview of CCP**

#### **1. Strong Compliance Leadership**

a. We have an established compliance program, which is led by our Chief Compliance & Ethics Officer. The Chief Compliance & Ethics Officer shares regular reports on compliance issues and initiatives to the Chief Executive Officer, members of the Leadership Team, BMS' Board of Directors and the Audit Committee of the Board of Directors.

b. Our Compliance & Ethics professionals are located globally and provide dedicated and comprehensive support to our BMS colleagues and partners thus promoting adherence to our high standards of integrity. BMS also has established regional Compliance

Committees, comprised of local leaders and members from various functions within the organization. Compliance Committees meet regularly and are responsible for identifying and mitigating compliance risks, supporting and promoting our culture of integrity and escalating issues to the Chief Compliance & Ethics Officer.

## 2. Clearly Written Policies

The BMS Principles of Integrity: Standards of Business Conduct and Ethics are the foundation for how we operate as a company and meet our commitments to our employees, patients, customers, shareholders, and the global community and form the basis for our policies and procedures. These principles help BMS employees and external partners deliver the highest quality products and maintain an unwavering commitment to our patients. The Principles of Integrity are translated and available internally and externally.

The policies and procedures are readily accessible on an online internal platform and promote compliance with legal and regulatory requirements, thereby protecting patients, our employees, and our stakeholders. They are regularly reviewed and updated to maintain their relevance and alignment with current best practices, regulatory requirements, and industry standards, including the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA) Code of Pharmaceutical Marketing Practices and the Pharmaceutical Research and Manufacturers of America's (PhRMA) Code on Interactions with Health Care Professionals.

To further our mission to serve patients, every employee has an obligation to understand and apply the Principles of Integrity, and relevant policies and procedures.

In addition, with respect to business activity in California, BMS has established "a specific annual dollar limit on gifts, promotional materials, or items or activities that [BMS] may give or otherwise provide to an individual medical or healthcare professional." This annual dollar limit is \$2,500 and primarily reflects dollars expended in association with programs designed to inform prescribing medical and other healthcare professionals about BMS products and the disease states these products help treat. BMS will evaluate this limit on an annual basis and make any necessary adjustments consistent with any operational or practical issues related to compliance with the statute. It is important to note that this annual dollar limit is an *upper limit*. It is not a representation of the *average* value of promotional materials, educational items or activities that BMS, a global biopharmaceutical company with many different divisions, medicines, and sales forces, may provide annually to a typical individual medical or healthcare professional. That *average* value would be a lower amount. Beginning in January 2009, and in line with the Pharmaceutical Research and Manufacturers of America (PhRMA) "Code on Interactions with Healthcare Professionals", BMS no longer distributed non-educational items, such as pens, mugs and other "reminder" items to healthcare professionals.

Based upon historical data, BMS anticipates very few medical or healthcare professionals will approach or reach the annual upper limit. BMS has created systems to support compliance with the specific annual dollar spending limit requirement of the CCP, and has monitored promotional spend to the extent of limiting dollars expended on individual healthcare professionals in association with their attendance at promotional programs.

(BMS uses good faith estimates of such spending with respect to certain types of expenditures and certain classes of recipients.) BMS does not define "promotional materials" to include documents that are used to educate and inform healthcare professionals about its products. BMS continues to take measures to enhance its ability to track and monitor all expenditures involving healthcare professionals and continues to fully endorse the PhRMA Code and abide by its recommendations.

### 3. Tailored Education

Education on our principles, policies, and procedures is essential to ensuring clear expectations and comprehensive understanding across the organization. Our robust educational program utilizes a variety of training modalities, including online courses, in-person sessions, virtual training, self-reads, case studies, and interactive games or challenges where appropriate. Targeted communications are provided as needed to emphasize the importance of these principles and outline the necessary actions employees must take.

The "Principles of Integrity: Standards of Business Conduct and Ethics" interactive education module is mandatory for all employees, with training completion tracked regularly. Additionally, we implement specialized education for people-managers, walking them through real-life scenarios on Compliance & Ethics related issues. A cornerstone of our education program is the continuous communication and engagement surrounding integrity and ethics, reinforced by a variety of integrity-focused activities that cultivate a strong ethical culture. This multifaceted approach ensures that our employees are well-informed and aligned with our commitment to ethical conduct and compliance.

### 4. Open Lines of Communication

We are committed to fostering an environment where all employees feel comfortable raising issues and voicing concerns. If an employee becomes aware of a compliance issue, they have an obligation to report the concern, which can be done through the BMS Integrity Line, available 24 hours a day, 7 days a week. Reports may be made anonymously where permitted by local law, and confidentially, except for select circumstances. In addition to the BMS Integrity Line, the company provides other channels for reporting concerns, including a supervisor or management representative, a professional from Human Resources or an employees' representative, or a member of the Law Department or Compliance & Ethics team.

In situations where employees need to ask questions or seek guidance confidentially, BMS has an established Ombuds program to serve as an independent, neutral, and impartial resource who provides confidential and informal guidance to employees.

### 5. Monitoring with Insight

At BMS, we have established a comprehensive monitoring program designed to proactively identify risks within our business operations and provide insights to business leaders to support well-informed decisions. In addition, we actively monitor and analyze external factors

such as government probes, legal settlements, industry standards, and regulatory guidelines.

## 6. Upholding Standards

At BMS, we expect all employees and relevant personnel to uphold our Principles of Integrity. Violations of our principles, policies, or procedures will result in appropriate remedial action and/or disciplinary measures. Additionally, any employee who fails to report a known or suspected violation of BMS policy or procedure may also face disciplinary action. BMS policy prohibits retaliation against those who make good-faith reports about violations or potential violations of our Code, policies, procedures, or applicable laws and regulations. Our policy is clearly communicated and consistently enforced.

## 7. Corrective Action

BMS is dedicated to timely addressing reports of known or suspected violations of company policies and applicable laws. Our goal is to respond promptly and effectively to all inquiries and reported concerns, ensuring thorough investigations and appropriate resolutions. For compliance issues where a violation is substantiated, and take proper remedial and/or disciplinary action, where applicable. We continuously strive to enhance our investigation process by implementing best practices, including through external benchmarking, leveraging advanced technologies, and fostering collaboration among all relevant stakeholders.

As described above, BMS strives to put ethical principles into practice, with policies and practices that fully embody responsibility, integrity and decency. BMS views its CCP as a reflection of this overall commitment, demonstrating responsiveness to evolving concerns and compliance risks.

California Health and Safety Codes §§ 119400 -119402 require BMS to "...make its Comprehensive Compliance Program [CCP] . . . available to the public." For the purpose of satisfying that requirement, this description provides an overview of BMS's CCP as of April 1, 2025.

BMS will assess its CCP at least annually, for the purpose of declaring compliance with California Health and Safety Codes §§ 119400-119402.

A copy of this Description of BMS's CCP may be obtained by calling the toll-free number 1-800-332-2056.