

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

As stated in the Bristol-Myers Squibb Company (BMS) Mission and Commitment, BMS operates with high standards of ethical behavior. BMS has established a Comprehensive Compliance Program (CCP) in accordance with California Health and Safety Codes §§ 119400-119402, and, to the best of its knowledge and based on its good faith understanding of the statutory requirements, declares that it is in compliance with this CCP and the statutory requirements. BMS has tailored its CCP to meet the specific nature and needs of the Company, and continuously assesses the effectiveness of its CCP to enable it to implement necessary adjustments or refinements.

Although, as recognized 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), even an effective CCP cannot completely eliminate the possibility that individual employees are engaging in conduct that would be considered improper, BMS's CCP is reasonably designed, implemented and enforced with the goal of preventing and detecting such improper conduct.

This Declaration is effective as of April 1, 2012 for the January 1, 2011 through December 31, 2011 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 1-800-348-5526.