Signature Manifestation Page

**Document Number:** BMS-SOP-6a (007034)
**Document Title:** Business Travel

<table>
<thead>
<tr>
<th>Lifecycle State History:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date: 30 Sep 2018 00:01:22 (GMT-04:00)</td>
</tr>
<tr>
<td>Lifecycle State: Effective</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Electronic Signatures:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signed By: Sara Friedlander (friedlas)</td>
</tr>
<tr>
<td>Decision: Approved</td>
</tr>
<tr>
<td>Decision Date: 19 Sep 2018 12:34:39 (GMT-04:00)</td>
</tr>
<tr>
<td>Role: Approver</td>
</tr>
<tr>
<td>Purpose: Approve</td>
</tr>
<tr>
<td>Meaning Of Signature: I approve this document as Management.</td>
</tr>
</tbody>
</table>

| Signed By: Charles A Bancroft (bancroc1) |
| Decision: Approved |
| Decision Date: 19 Sep 2018 15:04:16 (GMT-04:00) |
| Role: Approver |
| Purpose: Approve |
| Meaning Of Signature: I approve this document as Management. |
COMPANY STANDARD OPERATING PROCEDURE
BMS–SOP-6a: Business Travel

PURPOSE
To provide the Bristol-Myers Squibb Company (BMS) principles and expectations for consistent management of Business Travel.

SCOPE
In Scope
This SOP is applicable to all BMS employees. It also applies to non-BMS organizations and individuals (Non-BMS Entities) working on behalf of BMS to the extent that they are involved in the subject matter of this SOP, unless the BMS contract with the Non-BMS Entity states otherwise.

Applicable Subject Matter: Management of Business Travel.

Note: Defined terms are capitalized and appear in bold. Definitions can be found at the end of the document.

GUIDING PRINCIPLES

Principle 1: Travel Classification

BMS reimburses its employees for Business Travel that is incurred outside their normal Commute(s) to or from BMS Business Locations. Business Travel within a normal Commute is considered a personal expense and is not reimbursable.

Requirements
1. A normal Commute is travel to a Primary Work Location or a Regular Work Location from an employee’s residence. These expenses are Personal Expenses and are not reimbursable, except as noted in the table below.
   a. Note: Travel to a Regular Work Location by BMS-provided transportation is attributed to the employee as taxable wages.
2. Travel outside of an employee’s normal Commute is reimbursable as a Business Expense and not included as taxable income, except as noted in the table below.
<table>
<thead>
<tr>
<th>Travel Expense Classification:</th>
<th>Description of Travel:</th>
<th>Reimbursed?</th>
<th>Unless:</th>
</tr>
</thead>
</table>
| Personal Expense              | • The site *is* considered either the employee’s **Primary Work Location** or **Regular Work Location**. | NO         | ▪ An overnight stay *is required* at a **Regular Work Location**.  
▪ Travel takes place *between BMS Business Locations* on the same day.  
▪ Reimbursement is related to overtime work expenses (meals or meal money, or local transportation fare) which are:  
  1. reasonable  
  2. provided only occasionally  
  3. provided because overtime work is required after a normal work day  
  4. provided to enable the employee to work overtime (meals or meal money only) |
| Business Expense              | • The site *is not* considered either the employee’s **Primary** or **Regular Work Location**.  
  • The work location is a **Temporary Assignment** at a **BMS Business Location** other than the employee’s **Primary Work Location**.  
  • Travel takes place between BMS locations on the same day.  
  • An overnight stay outside of the employee’s **Primary Work Location** is involved. | YES        | ▪ The overnight stay occurs in connection with work at an employee’s **Primary Work Location**. |

**Principle 2: Business Travel**

*BMS establishes controls around Business Travel and uses Preferred Travel Suppliers in order to minimize its travel costs, provide safety oversight and allow for a positive traveler experience.*

### Requirements

1. Prior to booking travel, employees must consider alternatives to travel, such as teleconferencing, videoconferencing or web conferencing, to accomplish the business.
2. Exceptions to this SOP require documented pre-trip approval by the traveler’s or BMS host’s management.
3. All **Business Travel** arrangements (airline tickets, lodging, ground transportation, and car rental) must be made via BMS’ **Online Booking Tool** or **Travel Management Company**.
   a. Exception: For conferences not hosted by BMS, hotel bookings may be made through the conference host’s site or directly with specific hotel properties or chains, provided the hotel booking meets the requirements of this SOP.
4. Any accident while travelling for business must be reported in the BMS Accident Management System (SAFE-IM) found here.

5. Air travel
   a. Class of service
      i. When one flight segment is five (5) or more hours, business class travel is permitted except when traveling within the Continental U.S. (including Alaska), Canada, Mexico and Central America or between the U.S. and the Caribbean (including Puerto Rico), Canada, Mexico or Central America, for which only coach class is authorized.
      ii. First class travel and air travel in employee-owned aircraft or aircraft piloted by an employee is prohibited for business use.
      iii. Downgrading to a lower class of service after booking at a higher class of service is prohibited, unless a refund is provided to BMS. Upgrades are permitted if the traveler uses his or her own frequent flyer credits.
      iv. Travelers should not make flight selections based on personal preference (e.g., specific airline preference, frequent flyer program, aircraft type, seat preferences).
   b. Employees must consider the cost of travel relative to the most efficient way to meet the traveler’s business purpose when booking airfare.
      i. Consider: Airline tickets should be booked at least 14 days in advance of the departure date, unless business needs or your manager dictate otherwise. If booked within 14 days of travel, employees must document the rationale when expensing the travel.
      ii. Consider: Non-refundable/restricted tickets should be booked and an airfare selected that is not more than $100 (or equivalent) more expensive than the lowest available airfare, taking into consideration the travel time required to meet the business need.
      iii. Consider: Alternate airports must be considered when the fare savings is greater than the additional cost in ground transportation without compromising traveler safety or security.
   c. If Business Travel plans change and airline reservations will not be used, the reservation must be cancelled prior to the scheduled flight departure time on the travel itinerary.
   d. All unused airline tickets issued on behalf of BMS for both employees and Business Partners remain the property of BMS and must be applied to future business-related travel.

6. Ground transportation
   a. Consider: Travelers should use the most economical form of ground transportation to the extent practical, taking into account sound business judgment, as well as the safety of people and property.
   b. When a privately owned vehicle is used for any BMS business, the vehicle must be insured with coverage for the vehicle’s occupants.

7. Rental cars
   a. A designated global preferred rental car supplier must be used where available.
   b. Travelers must decline optional insurance coverage when renting a vehicle from the BMS global preferred supplier for Business Travel. Insurance is automatically included with the BMS corporate rate (including liability and property damage).
   c. Travelers must only pay the rental rate of an intermediate sized rental car or smaller.
      • Exception: A full size rental car is permitted if three or more passengers are traveling together.
   d. Drivers should refuel the vehicle before returning it to the rental car agency to avoid refueling charges that are substantially higher than market rates.
e. Accidents involving a vehicle rented for use on BMS business must be reported to the car rental agency immediately. The rental agency will notify the driver of the proper procedures for reporting an accident.

8. Hired car service (e.g., “Black car” service)
   a. Use of hired car service must be limited to:
      i. When an issue with the traveler’s safety or alertness may exist. Examples include: flight departures prior to 7 am, flight arrivals after 10 pm, or on intercontinental trips (travel between the U.S./Canada/Mexico is not considered intercontinental).
      ii. When traveling to, from, or within a city or country that may compromise the safety or security of travelers.
      iii. When the traveler flies into an airport that does not have taxi service to the traveler’s destination and shuttle service/car rental is not practical.
      iv. When it is the most economical form of ground transportation (inclusive of parking and mileage).
   b. If a BMS-preferred supplier exists, it must be used.

9. Ride Hailing (Uber, Lyft)
   a. The use of ride hailing is allowable and reimbursable if this is the most economical form of ground transportation.

10. Rail service
    a. Trips less than two hours (one way) must be booked:
       i. In economy class in North America
       ii. In second class in Europe and Asia
    b. Trips more than two hours (one way) may be booked:
       i. In business class in North America
       ii. In first class in Europe and Asia
    c. Sleeping accommodations, when necessary, are limited to a roomette or its equivalent.
    d. If using rail service between New Jersey and New York, NJ Transit must be used. Travel on Amtrak for this route is not permitted unless prior manager approval is obtained. Approval must be included on the expense form.

11. Accommodations and lodging
    a. Hotel reservations must be made via the Online Booking Tool or through the Travel Management Company at the BMS negotiated rate, where applicable, or lowest available business rate at the time of booking.
    b. Hotel reservations must be made at the BMS-negotiated rate where it exists.
       i. If no BMS-negotiated rate exists, travelers should book accommodations at the most cost-effective rate for the business need, taking into account the traveler’s safety.
       ii. Make sure you are not booking a non-refundable or pre-paid rate.
    c. Employees should not book luxury hotels for their use unless the property is listed in the Preferred Hotel Directory located on the Global Travel Site. For Healthcare Professionals (HCP) travel arrangements, see BMS-SOP-3b, Interactions with Healthcare Professionals and Healthcare Organizations.
    d. Standard room accommodations must be booked at each hotel, unless a free upgrade is applied.
    e. Upon check-in at the hotel, travelers should verify their duration of stay and room rate to ensure that the BMS rate or lowest available rate is received.
f. It is prohibited to book **Business Travel** accommodations through online community marketplaces, such as Orbitz and Expedia, or where the owners are unknown to the traveler, such as AirBnB.

g. If **Business Travel** plans change and a reserved hotel room will not be used, the reservation must be cancelled, with cancellation number noted, prior to the hotel’s cancellation deadline on the travel itinerary.

h. If traveler is traveling for five (5) or more consecutive nights, standard laundry and dry cleaning can be obtained and reimbursed.

i. If use of gym facility is not already included in room rate, this service may be obtained and reimbursed.

12. **Meals**

   a. Travelers must refer to the BMS established meal guidelines provided on the [Global Travel Site](#).

   b. Business meals with **Business Partners** must include substantial business-related discussion regarding a project, interviews for opinions, advice on personnel, academic topics, new ideas, sales, production, science or other business matters.

   c. For meal spend more than 20% over guidelines, a comment must be entered into Concur with reason.

13. **Pet Care**

   a. When warranted, pet boarding is reimbursable up to $20 per day, with a five (5) day maximum per business trip.

14. Refer to the [Global Travel Site](#) for additional details and guidance relating to the global travel program. If local procedures are more restrictive than this SOP, the more restrictive procedures must be followed.

---

**Principle 3: Travel Safety**

*BMS is committed to providing a travel experience that minimizes risks to the health, safety, security and operations of all travelers on BMS Business.*

- **Requirements**

  1. Travelers must take care to ensure that their health needs are being met before and during **Business Travel**.

     a. **Consider**: For international travel, seek health advice regarding your destination once you know your travel plans so you may understand any vaccination or personal health requirements that may relate to your particular destination.

     b. **Consider**: For all travel, creating a travel kit that contains an adequate supply of your personal medications, as well as additional first aid items and over-the-counter treatments, is advised. Travel health advice can be obtained at any BMS Medical Clinic or from your physician.

  2. Travelers must book travel to countries according to each country’s security level, as found on the [Travel Services page](#).

  3. Travelers must provide all personal travel information to the **Travel Management Company** and within the [Online Booking Tool](#).

  4. All travelers with an itinerary that involves crossing a country border must obtain all required travel documents, such as visa, passport or other required documents, prior to the trip departure date.

  5. Travelers must use BMS-approved travel applications and websites that provide travel, security and medical alerts before and during all **Business Travel** to prepare for and remain aware of conditions at their destinations.

     a. Travelers must first and foremost follow guidance provided by local authorities in the event of a security or weather incident while traveling on BMS business.

  6. Business expenses must be paid by using the approved charge card that the Company provides to employees in accordance with [BMS-SOP-6c, Business Expenses](#).
7. Cash advances are only available to employees who travel internationally for business. The cash limit is $1,000 per month.

8. BMS limits the number of key executives and employees traveling together to minimize the impact to operations due to any unforeseen events.
   a. Supervisors must not fly with more than three subordinates.
   b. No more than three people reporting to the same leadership team member can travel together.

 DEFINITIONS

<table>
<thead>
<tr>
<th>Defined Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allied Healthcare Professionals</td>
<td>A clinical professional who works as part of a healthcare team by providing a range of diagnostic, technical, therapeutic and direct patient care and support services to Healthcare Professionals.</td>
</tr>
<tr>
<td>BMS Business Location</td>
<td>A BMS facility wherever located.</td>
</tr>
<tr>
<td>Business Partners</td>
<td>Non-employees of BMS, including but not limited to leased workers, consultants, independent contractors, Healthcare Professionals, Allied Healthcare Professionals and employment candidates working for or on behalf of BMS who perform work associated with a specific project or service.</td>
</tr>
<tr>
<td>Business Travel</td>
<td>Travel on behalf of BMS’ business that is not personal travel. Personal travel includes Commuting.</td>
</tr>
<tr>
<td>Commuting (or, “Commute”)</td>
<td>Travel between the employee’s home and the employee’s Primary or Regular Work Location (with certain exceptions described in this SOP).</td>
</tr>
<tr>
<td>Healthcare Professionals (HCP)</td>
<td>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 this Directive, Healthcare Professionals also includes non-clinical researchers who provide consulting services.</td>
</tr>
<tr>
<td>Online Booking Tool</td>
<td>Web-based tool used by employees to make travel arrangements such as Concur.</td>
</tr>
<tr>
<td>Preferred Travel Supplier</td>
<td>A vendor with which BMS has an arrangement to receive discounts or other advantages for travel.</td>
</tr>
<tr>
<td>Primary Work Location</td>
<td>The BMS work location where the employee spends the most time during the year.</td>
</tr>
<tr>
<td>Regular Basis</td>
<td>Working at a BMS location at least once a week or 50 or more days per year, other than the employee’s Primary Work Location, unless it is for a Temporary Assignment as defined below.</td>
</tr>
<tr>
<td>Regular Work Location</td>
<td>A BMS work location that requires travel of less than 50 miles in excess of the employee’s normal Commute to the Primary Work Location, to which the employee, for an indefinite period, travels on a Regular Basis, as defined below.</td>
</tr>
<tr>
<td>Temporary Assignment</td>
<td>An assignment to work at a particular BMS work location which does not last for more than one year and where travel by that employee to that location before and after the assignment, if any, is infrequent.</td>
</tr>
<tr>
<td>Travel Management Company</td>
<td>The BMS designated travel company used to make travel arrangements globally for all BMS employees and non-employees who travel on behalf of BMS</td>
</tr>
</tbody>
</table>
REFERENCES

1. BMS-SOP-3b, Interactions with Healthcare Professionals and Healthcare Organizations
2. BMS-SOP-6c, Business Expenses

DOCUMENT HISTORY

<table>
<thead>
<tr>
<th>Effective Date</th>
<th>Version Number</th>
<th>Description</th>
</tr>
</thead>
</table>
| See Signature Manifestation Page | 2 | • Clarifications related to air travel and ground transportation  
• Emphasized requirement to use online booking tool and to verify rate and inclusions at check-in  
• Added standard laundry service for 5+ night stays and gym fees as reimbursable if not included in room rate  
• Added requirement that meals with spend more than 20% over the guidelines need to have a comment in Concur at expensing  
• Added use of AirBnB and allowance for pet care |

| Author(s): | Amee Gullickson | Approvers and Titles: | Sara Friedlander, Director Professional Services Procurement  
Charles Bancroft, Chief Financial Officer |
| Date: | April 1, 2017 | Version: | 1 |
| First version. Converted to a principles-based procedural document, replacing: | | | • BMS-CP-057, Travel  
• BMS-CD-057a, Travel  
• BMS-CP-024, Business or Personal Travel Classification  
• BMS-CD-024, Business or Personal Travel Classification |

| Author(s): | Amee Gullickson | Approvers and Titles: | Sara Friedlander, Director Professional Services Procurement  
Charles Bancroft, Chief Financial Officer |
| Date: | April 1, 2017 | Version: | 1 |