

Celgene PAC and Political Contributions Governance and Transparency

The Celgene Corporation Political Action Committee ("Celgene PAC") is a volunteer, nonpartisan, employee-run organization that provides opportunities for eligible employees to participate in the American political process. Celgene PAC supports and contributes to federal and state candidates from both political parties and across the political spectrum who share our commitment to these core principles of access and innovation in health care:

- Expanding access to medicines through a competitive marketplace and a regulatory environment in which innovation can flourish
- Protecting the patient-physician relationship and ensuring patient access to innovative treatments
- Recognizing the important role of biopharmaceutical companies and their employees in the ecosystem of innovation in health care

Celgene PAC makes contributions to candidates for federal and state offices and to other political action committees. Celgene PAC fully discloses its contributions on a regular basis to the Federal Election Commission. Contributions with corporate funds are made, where legally permissible, to candidates and political committees for state offices, based on the same core principles set forth above. Celgene fully complies with all federal, state and local laws and reporting requirements governing PAC and corporate political contributions.

Celgene has a Corporate Policy on Political Contributions and Lobbying that establishes the responsibilities of Celgene, its subsidiaries, and affiliates with respect to political contributions. This policy prohibits use of corporate resources on political activity in the U.S. except with respect to Celgene PAC and corporate political contributions permitted by law. The policy requires that contributions reflect the interests of the company, not those of any individual or officer within the corporation. This policy also establishes the responsibilities of Celgene employees when considering making personal political contributions.

Any political contributions by Celgene PAC or by Celgene Corporation must be approved by the Celgene PAC Board of Directors. The Celgene PAC Board of Directors, which consists of eleven company employees appointed by the Chairman and Chief Executive Officer, is also responsible for affirmatively ensuring that both Celgene PAC and Celgene Corporation comply with the Corporate Policy on Political Contributions and Lobbying.

Celgene is committed to transparency of all political contributions by Celgene PAC and Celgene Corporation. Since Celgene PAC was established in 2012, Celgene has issued reports twice a year, during the quarter following the end of each half of the year, including all contributions made by Celgene PAC and Celgene Corporation to candidates and political committees at both the federal and state level. These reports are posted on Celgene.com in "Political Activities and Contributions" under the "Governance" tab within the "Corporate Responsibility" section.

Any contributions by Celgene PAC or Celgene Corporation to independent expenditure campaigns, to 527 Organizations or to influence the outcome of specific ballot measures would need to be reviewed and approved by the Celgene PAC Board of Directors and would be disclosed in our semi-annual political contributions report readily available on the Celgene website.