

POLICY

Corporate Responsibility and Sustainability

1. PURPOSE

The purpose of this policy is to promote Celgene Corporate Responsibility through the following five pillars:

- **Patients & Communities:** Delivering value of innovative medicines to patients, communities and the world
- **Commitment to Safety:** Advancing the standards for patient and employee safety worldwide
- **Governance:** Leading with integrity in all business practices
- **Global Health:** Addressing global healthcare challenges through medical innovation
- **Environment & Sustainability:** Implementing environmentally responsible and sustainable business practices every day.

Celgene Corporate Responsibility defines who we are and ensures that we continue to maximize opportunities for patients, our partners, employees and the environment. Corporate Responsibility aims to synchronize and drive various initiatives in connection with sound economic, environmental and social practices and to develop awareness about key issues and practices with all of our affiliates and personnel around the world. The overall goal of the program is to improve business performance while executing business practices in a highly ethical and responsible manner.

Sustainability is woven into Celgene's core values of passion, courage, trust, and excellence. Through passion for the patient, we believe that what we do matters to the world. With courage, we face the challenges of future uncertainties, enabling us to create new standards in the broader world of human health. With trust in each other, we assume the best and treat one another with dignity and respect. By fostering excellence, we pursue transparency in communications and data-driven results to take our work to the highest standards. We apply these values to sustainability by putting patients first, caring for the environment, and growing a healthy company.

2. SCOPE

The scope of this policy includes the following aspects:

- Sustainability aspects of Celgene's mission
- Regulatory compliance through Global Environmental Health and Safety
- Charitable and philanthropic donations
- Global Health
- Environmental sustainability
- Pollution prevention and waste minimization
- Energy and fuel conservation
- Water conservation
- Climate change opportunities and risks
- Risk management process

- Biodiversity consideration
- Employee awareness
- Supply chain impacts
- Performance management and improvement
- Reporting and disclosure

3. ROLES AND RESPONSIBILITIES

It is the joint responsibility of Corporate Affairs, Corporate Services and Environmental Health and Safety to administer this policy.

A cross-departmental Sustainability Committee shall be responsible for (a) approval of Celgene's annual Corporate Responsibility Report; (b) establishment, progress and optimization of significant corporate environmental initiatives; (c) any open investigations or significant actions by regulatory agencies related to Celgene's environmental practices; (d) stakeholder engagement and public reporting relating to Celgene's sustainability efforts; and (e) such other items as Corporate Affairs, Corporate Services, Environmental Health and Safety, or any member of the cross-departmental Sustainability Committee deems appropriate. In addition, the cross-departmental sustainability committee shall serve as the company's liaison to outside organizations and programs focused on sustainability, including the CDP (formerly the Carbon Disclosure Project) and the Global Reporting Initiative (GRI).

The cross-departmental Sustainability Committee, appointed by the Chief Executive Officer, shall comprise no fewer than nine people. At least one person from each of Corporate Services, Finance, Tech Ops, Human Resources, Corporate Affairs, Legal, Celgene Global Health, Investor Relations and Environmental Health and Safety will serve on the committee. The Executive Vice President of Corporate Affairs & Market Access, who reports to the Chief Executive Officer and is a member of the Executive Committee, shall chair the cross-departmental sustainability committee and provide reports to the Executive Committee on a biannual basis detailing activities and matters arising under this policy.

The Vice President of Corporate Responsibility shall be responsible for execution of the company's corporate responsibility strategy.

4. STANDARDS

4.1 Sustainability Aspects of Celgene's Mission

At Celgene, we are committed to improving the lives of patients and the communities in which we live. We promise to always put patients first, by providing patients around the world with safe, well-controlled access to life-enhancing therapies and by improving patient care globally through education, innovation and bold pursuits in science. We respect our environment and conduct our business every day based on integrity, ethics, sound decision making, and behaviors that reflect our values.

Celgene Corporate Responsibility, reflected in this policy, includes the following commitments:

- To put patients and communities first, Celgene will:
 - Partner with patient advocates in supporting disease awareness and education, patient access and patient and caregiver services.
 - Support organizations that connect patients to treatment.
 - Uphold industry-leading patient safety and ethical standards.

- To carry out our commitment to safety, Celgene will:
 - Ensure comprehensive safety monitoring by involving itself in every step of clinical development processes.
 - Involve every employee in the monitoring and reporting on the safe use of our products.
 - Continuously maintain and upgrade state-of-the-art risk management systems for our products.
 - Monitor, track, and routinely report on our health and safety performance, and continually review risks to better protect our people.

- To foster good governance, Celgene will:
 - Establish policies and practices that support corporate governance and transparency in reporting.
 - Monitor compliance with our own internal policies and guidelines, including policies and guidelines that relate to sustainability and protection of the environment.
 - Provide periodic and publicly available reports that demonstrate our commitment to transparency, ethical conduct, and stewardship of our natural resources.

- To address global health issues, Celgene will:
 - Engage and support academic institutions, product development partnerships, and other stakeholders in low and middle income settings.
 - Work in partnerships to discover and develop innovative treatments to address unmet medical needs in low and middle income settings.
 - Collaborate with partners around the world to support capacity building and improve healthcare services in low and middle income settings.

- To care for the environment and to foster sustainability, Celgene will:
 - Seek opportunities to minimize our global carbon footprint
 - Develop programs that reduce waste, conserve energy, and maintain our compliance with environmental regulations.
 - Monitor our water consumption and maintain water quality.

4.2 Regulatory Compliance through Global Environmental Health and Safety

Celgene is committed to ensuring the health and safety of its people, protecting the environment and complying with legal and regulatory guidelines. The Global EHS Mission is to deploy a comprehensive environmental, health and safety management system where all Celgene sites are empowered, provided with tools and guidance,

and held accountable for operating in a healthy, safe, compliant, and environmentally responsible manner.

The Global EHS Management System is a comprehensive framework that defines EHS directives, provides guidance and tools, delineates EHS accountabilities and ensures compliance. The mandate is to execute clear EHS strategy, issue clear EHS directives, provide robust EHS infrastructure, and ensure EHS compliance. The Global EHS service model serves works to define roles between corporate EHS responsibilities and functional/local responsibilities by minimizing environmental and occupational health and safety risk. These services include: interpretation of guidelines, documentation of requirements and issuing directives, providing technical advisory, risk management, product stewardship, vendor oversight support, generalist EHS site support, auditing, metrics and compliance reporting. Celgene leadership is proactively engaged to ensure a consistent approach to operating in a healthy, safe, compliant, and environmentally responsible manner.

4.3 Charitable and Philanthropic Donations

Celgene focuses charitable and philanthropic support, on humanitarian and social programs, science education and community giving. We will continue to be receptive to strategic corporate giving and contributions, which may be made in response to a funding request or proactively at the discretion of the company.

4.4 Global Health

Celgene is committed to finding innovative solutions for healthcare challenges in low and middle income settings. Our work is based on the belief that innovative therapies and healthcare partnerships are essential components to long-term progress and prosperity around the globe. We believe patients should have the opportunity, regardless of their location or financial resources, to benefit from advances in prevention, diagnosis and treatment of diseases. Through Celgene Global Health, Celgene will continue to collaborate with partners, including global Product Development Partnerships, academic institutions, non-government organizations, public/private funding organizations, contract research organizations and other biopharmaceutical organizations, to evaluate our proprietary compounds for activity in neglected disease and to find new therapies for diseases of the developing world.

Celgene will also continue to support and help to expand the reach and impact of global health capacity building efforts with our partners with the goal of enhancing their short and long-term potential. Capacity building provides a sustainable means of finding innovative solutions for the healthcare challenges in low and low-middle income settings.

4.5 Environmental Sustainability

This policy is intended to promote sustainability, minimize effects on the environment, establish a better understanding of environmental and climate-related opportunities and risks throughout our supply chain, and develop appropriate management plans that are integrated throughout the company.

Pollution Prevention and Waste Minimization

Manufacturing processes and research laboratories have the potential to generate waste in the form of air emissions, hazardous chemicals, non-hazardous waste (such as packaging and other trash), wastewater, and by-products. Celgene strives to minimize waste generation through reduction, reuse and recycling practices. To minimize product to waste ratio and costs associated with landfilled waste, hazardous waste handling, and water treatment, Celgene will seek improvements in manufacturing and research processes that minimize waste and use more environmentally friendly chemicals where feasible. Such improvements, when identified, will be evaluated for benefit to the environment, simple payback, and life-cycle costs before implementation.

Energy and Fuel Conservation

Celgene seeks to optimize the use of valuable natural resources in manufacturing facilities, research laboratories, fleet vehicles, and office facilities by conserving energy and reducing fuel consumption. Energy conservation can often be achieved through no- to low-cost facility adjustments, such as modifying HVAC settings or changing the types of bulbs used in light fixtures. These adjustments will be implemented as opportunities for improvement are identified by facility managers where feasible. Long-term, high-value capital investments (for example, renewable energy, equipment, and other strategies) will be evaluated for benefit to the environment, simple payback, and life-cycle costs before implementation.

Water Conservation

Water and wastewater handling, treatment, and disposal will be conducted in accordance with regulations, as identified in Section 4.2, Regulatory Compliance through Global Environmental Health and Safety. Additionally, Celgene will seek opportunities to reduce water use in manufacturing processes and research laboratories, and to reuse or recycle non-potable water in other consumptive facility processes where feasible. Water discharged from Celgene facilities will be returned to the environment (rivers, lakes, or other water bodies) in a manner consistent with environmental regulations.

Climate Change Opportunities and Risks

Celgene will consider how our company, supply chain and the communities we rely on are vulnerable to the impacts of climate change. We will also investigate solutions for managing climate risks while creating positive benefits for the company, communities, and the environment. Celgene recognizes that the following areas of our direct operations and value chain are potentially affected by climate change:

- Investor Expectations
- Regulatory Requirements
- Community
- Raw Material Sourcing
- Distribution
- Production and Operations

4.6 Biodiversity Consideration

Celgene has facilities located in major metropolitan, rural, and suburban areas in more than 40 countries. Celgene will hold itself to protecting and preserving biodiversity and respecting nature on and around our facilities. This includes evaluating our operations to comply with international, national, and local regulations concerning preservation of natural places and promoting open green spaces. Land use information will be recorded and filed on a regular basis to assess compliance. Risks will be identified that are associated with both operations and land use before, during, and after occupation. Facility impact on biodiversity will be included in the design of new buildings and the renovation of existing facilities.

4.7 Risk Management Process

Risk management is already a part of Celgene's corporate policy and risk management efforts will be expanded to develop appropriate sustainability efforts and to enhance environmental compliance. Opportunity management at Celgene is based on observation and analysis of individual markets and the early recognition and evaluation of trends from which opportunities can be identified. Effective management of environmental opportunities and risks is a factor in sustainably protecting Celgene's assets. At Celgene, opportunities and risks are systematically identified, analyzed, and documented. Risk-relevant information is compiled and reviewed on a regular basis. Celgene has taken an approach to develop appropriate sustainability efforts and to enhance environmental compliance that includes the following steps:

1. Identify opportunities and risks to our business and operations related to sustainability and environmental compliance.
2. Analyze the identified opportunities and risks.
3. Plan and prioritize actions that are needed to address these opportunities and risks.
4. Implement appropriate actions and evaluate the progress of these actions.

4.8 Employee Awareness

Celgene provides education to personnel and ongoing awareness building activities through proactive internal communication programs on environmental programs and strategies. Employee environmental awareness supports energy efficiency, waste minimization and water conservation. Employees are encouraged to consider alternatives to business travel, mass transportation options for commuting, and low-emission or electric vehicles.

4.9 Supply Chain Impacts

In support of Celgene's environmental practices and sustainability efforts, Celgene will evaluate supply chain impacts where feasible. This evaluation will include general-sourced items for everyday operations through our Global Strategic Sourcing department and, potentially, sourcing of the ingredients that comprise our therapies through our Technical Operations department. The evaluation can potentially include risks inherit to sourcing locations, resources consumed in the extraction,

manufacturing and distribution operations, and the end of life treatment of our therapies.

4.10 Performance Management and Improvement

Celgene's policy is to improve environmental performance by putting systems in place to periodically measure environmental impacts and to improve processes where feasible. In addition, Celgene incorporates into the compensation incentives of its Corporate Services and Environmental Health and Safety teams goals related to responsible management of Celgene's impacts upon the environment.

4.11 Reporting and Disclosure

Celgene reports on sustainability performance through programs such as the CDP (formerly the Carbon Disclosure Project) and Global Reporting Initiative (GRI) and the Human Rights Campaign Corporate Equality Index (CEI). In addition, Celgene provides a Corporate Responsibility Report on an annual basis which is available to all stakeholders on its external website at www.celgene.com.