

## **Consent Decree per Section 50B of the Economic Competition Law, 1988**

### **A. Definitions**

**"Related Person"** – Any person controlling Neopharm Scientific Ltd. or Bristol-Myers Squibb, any entity that is controlled by Neopharm Scientific Ltd. or by Bristol-Myers Squibb or is under common control with Neopharm Scientific Ltd. or with Bristol-Myers Squibb and any entity controlled by any of them;

**"Tribunal"** – the Competition Tribunal;

**"The Law"** – the Economic Competition Law, 5748-1988;

**"Director General"** – the Competition Director General (including the Israeli Competition Authority);

[REDACTED]

**"Subject Matter of the Decree"** – (1) Neopharm's and BMS' conduct, known to the Director General at the time of signing this Decree in unjustifiably delaying, according to the Director General's position, the supply of the Imnovid drug to a company that sought to register a generic drug, until after the fulfillment of conditions set for the supply of the drug, conditions that were not required from other purchasers who acquired the drug for medical treatment or human research who signed a risk management plan, when the requesting company received approval from the Ministry of Health that a risk management plan was not necessary; (2) Neopharm being a party to an agreement with BMS that includes a provision restricting the supply of the Imnovid drug in a manner that, in the Director General's view, is unjustified;

**"Anyone on their behalf"** – including their officers, employees, agents, experts, directors, and shareholders, past and present;

**"Neopharm"** – Neopharm Scientific Ltd. and any related person;

**"Control"** – As defined by the Economic Competition Rules (General Provisions and Definitions) (Temporary Provision), 5766-2006;

**"BMS"** – Bristol-Myers Squibb Company and any related person;

### **B. The commitments that are subject to the Decree**

1. Neopharm and Bristol-Myers Squibb shall pay the sum of NIS 44,260,634 and the Officer shall pay the sum of NIS 211,889 to the State Treasury. The payment shall be made within 60 days

from the date of the Tribunal's decision, giving the force of a Decree to these consents in accordance with Section 50B of the Law.

2. Subject to the approval of this Consent Decree by the Tribunal and compliance with the provisions of para. 1 above, the Director General will not take any enforcement measures or exercise any authority whatsoever with respect to Neopharm or Bristol-Myers Squibb or anyone on their behalf, with respect to the Subject Matter of the Decree, and with respect to any other matter regarding the Imnovid drug (including in connection with the examination proceeding itself conducted by the Director General) known to the Director General at the date of signing this Decree.
3. This Consent Decree shall not be construed as an agreement or admission by Neopharm or Bristol-Myers Squibb or anyone on their behalf, of any violation of the provisions of the Law or any other law.
4. This Consent Decree shall not be construed as an agreement or admission by BMS, or anyone in its behalf, regarding the existence of authority to the Director General to the exercise any powers in connection with them and/or regarding the applicability of the Law to them, and they deny any claim of such authority or applicability.
5. The provisions of this Decree should not be construed as implying the existence of a finding by the Director General regarding a violation of the Law by Neopharm or Bristol-Myers Squibb or anyone on their behalf and they should not be considered as evidence of a violation of the Law.

**IN WITNESS WHEREOF:**

\_\_\_\_\_  
Neopharm Scientific Ltd.

\_\_\_\_\_  
The Officer

\_\_\_\_\_  
Date

I, \_\_\_\_\_, legal counsel for Neopharm Scientific Ltd., hereby confirm that the person who signed above in its name is authorized to do so.

\_\_\_\_\_  
Signature and stamp

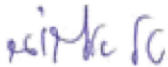


Bristol-Myers Squibb  
Company

August 14, 2025

Date

I, Tal Eyal-Boger, legal counsel for Bristol-Myers Squibb Company, hereby confirm that the person who signed above in its name is authorized to do so.



Signature and stamp

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Director General

Date