

### 1. Scope

Applicable to all Amgen Inc. and subsidiary or affiliated company staff members, consultants, contract workers and temporary staff worldwide (“Covered Persons”). Consultants, contract workers, and temporary staff are not Amgen employees, and nothing in this Policy should be construed to the contrary.

### 2. Policy

As a global organization, Amgen must comply with applicable laws and regulations against the improper influence or corruption of government officials in every country in which it does business. These laws and regulations govern interactions between government officials and employees (collectively, “government personnel”) and Covered Persons, and include laws that regulate the provision of gifts and other items of value to government personnel, lobbying, and other political activities. The laws and regulations in the United States (“U.S.”) and other countries, relevant to Amgen’s drug development, manufacturing, and commercial activities— including those relating to interactions with government personnel—go beyond those for companies outside the biotechnology and pharmaceutical industries. For example:

- The U.S. and most other countries have specific laws and regulations for the pharmaceutical industry and have given regulatory oversight responsibility to one or more governmental agencies.
- The healthcare systems in many countries are operated by the government, and healthcare providers (e.g., physicians and hospital personnel) frequently are government employees. Covered Persons must be particularly sensitive to this issue because a country’s government is often both the regulator of our products and a customer.
- Practices generally accepted in the U.S. commercial business environment may not be lawful or appropriate in interactions with government agencies or personnel (whether in the U.S. or other countries).

It is Amgen’s policy to comply with all applicable laws and regulations governing interactions with government personnel. This Policy sets forth the requirements for interactions with governments and government personnel, including activities involving gifts to government personnel, lobbying and advocacy activities, political contributions and other activities involving elections of government officials, and government procurement activities.

#### **General Prohibition on Improper Influencing of Government Personnel**

Covered Persons must comply with all applicable laws and regulations with respect to interactions with governments and government personnel and avoid interactions or situations that could be expected to result in reputational harm to Amgen. Under no circumstances will Covered Persons attempt to improperly influence government personnel, or give government personnel any form of payment or gift in order to improperly advance Amgen’s commercial interests with the government. In particular, Covered Persons are prohibited from making, offering, or promising any payment, gift, service, or anything of value (directly or indirectly) that is intended to improperly influence any government personnel’s actions. This includes obtaining restricted information from the government or securing favorable regulatory treatment.

### Gifts to Government Personnel

A “gift” generally includes anything with monetary value and includes (but is not limited to) meals, entertainment, travel-related expenses, goods, services, and discounts. All gifts from Covered Persons to any government personnel (in the U.S. and other countries) must comply with applicable laws and regulations, including any government ethics rules. This applies even if a Covered Person pays for the gift with his or her own funds, and even where Amgen is not legally responsible for violations of the applicable laws or regulations.

- In the U.S. only, Amgen State Government Affairs Personnel and other Covered Persons who routinely interact with state and local government personnel (e.g., Corporate Account Managers) may provide gifts to government personnel. All gifts provided to government personnel in the U.S. must comply with the *U.S. Standard for Gifts to Government Employees*.
- Covered Persons outside the U.S. must comply with the local country laws and regulations on gifts to government personnel. Questions about the appropriateness of giving gifts to government personnel must be reviewed with the Law Department.

### Anti-Corruption Compliance

In addition to the legislation pertaining to domestic bribery or corruption, the U.S. and many other countries have laws and regulations specifically prohibiting improper payments to foreign governmental personnel. See the *Anti-Corruption and U.S. Foreign Corrupt Practices Act Policy* and speak to the Law Department for further guidance in this area.

### **Government Procurement**

Covered Persons who are involved in government procurement activities (i.e., tender arrangements for the supply of Amgen products) must also be aware of the laws and regulations in that area. Below is a non-exhaustive list of examples of unacceptable practices in connection with government procurement:

- Offering employment to procurement or regulatory personnel;
- Discussing with procurement or regulatory personnel the possibility of their employment with Amgen;
- Offering business opportunities to procurement or regulatory personnel;
- Discussing business opportunities with procurement or regulatory personnel;
- Soliciting or obtaining proprietary or source selection information; and
- Offering or providing gratuities or accepting “kick-backs” in connection with procurement.

Any conduct that constitutes an attempt to improperly influence government personnel is a violation of this Policy.

### **Lobbying and Political Activities**

In the U.S., there are local, state and federal laws that regulate lobbying and political activities by and on behalf of companies. Countries outside of the U.S. may also have laws and regulations that govern these types of activities. It is Amgen’s policy to comply with these laws and regulations.

In the U.S., all lobbying activities and corporate political activities must comply with the *U.S. Standard for Lobbying Activities* and *U.S. Standard for Use of Corporate Resources for Political Activities*. Covered Persons outside of the U.S. must consult the Law Department before engaging in lobbying or political activities, or using corporate resources for political activities.

In the U.S., Covered Persons must observe the following guidelines:

- Covered Persons that engage in or are otherwise involved in lobbying government entities or government personnel on Amgen's behalf must comply with all applicable laws and regulations at every level of government. Often these laws and regulations include registration in advance of any lobbying activity and certain reporting requirements.
- Except as provided in this paragraph, corporate contributions and related expenditures provided for federal, and some state and local, elections are illegal. No corporate political contributions may be made unless such contributions are approved in advance by the head of Amgen's Federal or State Government Affairs Officer or his or her designee. Amgen's Political Action Committee ("Amgen PAC") may lawfully make political contributions at the federal level and in some state and local jurisdictions, and only the Amgen PAC Treasurer is authorized to make such contributions.
- No contribution or expenditure may be made on behalf of a candidate for public office at any level of national or local government, if that contribution or expenditure is made as part of any direct or implied *quid pro quo* with the candidate.
- The governance documents related to Covered Persons' involvement in political activities do not restrict the ability of Covered Persons to engage in personal lobbying on their own time for matters unrelated to Amgen and not done on behalf of Amgen, provided that no Amgen funds, resources, or facilities are used to support such activity.
- All grants and other funding provided to government personnel and entities on Amgen's behalf must be approved in advance by the Law Department.

### 3. Additional Information

#### Covered Persons Responsibility for Compliance

Every Covered Person worldwide is required to follow (1) the Amgen Code of Conduct, (2) laws and regulations applicable in the relevant jurisdictions, and (3) Amgen governance documents applicable to him or her, including without limitation, those relating to this Policy. Covered Persons should exert due diligence in preventing violations of such laws, regulations, and governance documents. Covered Persons must refer to the governance documents in effect for the geographic area in which they work, or for which they are responsible, or request guidance from their manager or compliance representative with responsibility for that geographic area. See Section 4, below, for a non-exhaustive list of governance documents related to this Policy. The term "governance documents" in this Policy means Amgen's written policies, standards, procedures, business practices, and manuals.

Amgen expects its managers to (1) be familiar with (or take appropriate steps to become familiar with) the laws, regulations, and Amgen governance documents applicable to the activities they manage or supervise, (2) provide that their direct reports have appropriate training on compliance issues to perform their job functions, and (3) supervise their direct reports with respect to compliance requirements and activities.

If Amgen determines that any Covered Person has violated this Policy, related standards, procedures or controls, applicable laws or regulations, or any governance documents, appropriate disciplinary measures will be taken, up to and including immediate termination of employment, to the extent permitted by applicable laws. The following is a non-exhaustive list of possible disciplinary measures to which Covered Persons may be subject (subject to applicable law): oral or written warning, suspension, removal of job duties/responsibilities, demotion, reduction in compensation, and/or termination of employment.

Subject to applicable laws, Amgen reserves the right to take whatever disciplinary or other measure(s) it determines in its sole discretion to be appropriate in any particular situation, including disclosure of the wrongdoing to governmental authorities. Nothing in this Policy changes the at-will nature of employment at Amgen, its affiliates or subsidiaries, where applicable. Amgen may also terminate the services or work engagement of non-employee Covered Persons for violation of this Policy.