

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

Many countries in which Amgen has operations have enacted anti-corruption legislation. For example, the U.S. Foreign Corrupt Practices Act (the “FCPA”) is a U.S. federal statute that, among other things, makes it illegal to make payments to government officials of any country outside of the U.S. for the purpose of obtaining or retaining business. It also requires U.S. companies and their affiliates to keep accurate books and records and to maintain internal accounting controls to ensure that transactions are executed in accordance with management’s instructions and properly recorded on the company’s books. Anti-corruption legislation in other countries is similar to the FCPA but in some cases, the requirements of other countries’ laws go even further than the requirements of the FCPA. Covered Persons are required to comply with local requirements. For guidance on specific local laws, Covered Persons must consult the Law Department.

It is Amgen’s Policy to comply with the FCPA and the laws of other countries that prohibit bribery or corruption. This Policy will assist Covered Persons in distinguishing between permissible business conduct and illegal behavior.

General Principle

Covered Persons must not offer, promise, give, or accept—directly or indirectly—any payment (whether cash or non-cash) or any other advantage or thing of value to any Foreign Government Official or any other Third Party as an improper inducement for such person to take any action, or refrain from taking any action, that benefits Amgen businesses.

Covered Persons must:

- Maintain a basic familiarity with the principles and purposes of the FCPA and similar local laws as they apply to Amgen businesses (consult the Law Department for guidance on local laws);
- Abstain from any activities that might violate or give any appearance of intention to violate such laws; and
- Seek guidance from the Law Department in any circumstances where doubt exists as to the appropriateness of proposed conduct.

Payments to Foreign Government Officials and other Third Parties

Anti-corruption legislation in many countries, including the U.S., specifically prohibits making a payment to a Foreign Government Official in order to influence that Official’s behavior. The term “Foreign Government Official” means any person acting in an official capacity on behalf of a government, agency, department or instrumentality of another country, including, in some countries, government-owned businesses such as hospitals. It also includes any political party or candidate for political office, and their representatives. In addition, anti-corruption legislation in certain countries extends the prohibition on improper influencing to non-government officials (i.e., Third Parties). Covered Persons must not directly or indirectly, offer, promise to pay or authorize the payment of money or anything of value to a Foreign Government Official or other Third Parties for the purposes of:

- Influencing any act or decision of the Foreign Government Official or other Third Party;
- Inducing a Foreign Government Official or other Third Party to act or fail to act in violation of his or her lawful duty;
- Securing any improper advantage; or
- Inducing a Foreign Government Official or other Third Party to use his or her influence with a foreign government or instrumentality in order to retain or obtain business.

Covered Persons are also prohibited from offering or paying anything of value to an intermediary (e.g., a distributor or outside consultant) while knowing that the intermediary will channel some or all of the payment to a Foreign Government Official or other Third Party for any of the purposes outlined above.

Please note that merely making or authorizing an offer to make payments or give something of value is prohibited. The offer does not need to be accepted, and no payment needs to be made in order for liability to exist under the FCPA and other similar legislation. Note also, that a payment made to obtain special regulatory or other government treatment can also be construed as a payment to obtain or retain business.

“Facilitating” or “Expediting” Payments

Occasionally, Covered Persons may be asked by low-level bureaucrats or other Foreign Government Officials for a payment to persuade them to perform their administrative, non-discretionary functions (e.g., processing of routine paperwork or applications or clearance of goods through customs). These are often referred to as “facilitating” or “expediting” payments. The FCPA has a very narrow legal exemption related to facilitating or expediting payments to secure routine governmental action, but the laws of many other countries do not permit such payments.

Under Amgen Policy, Covered Persons **are prohibited** from making facilitating or expediting payments. If there is a threat that Amgen’s business is being paralyzed by a Foreign Government Official, Covered Persons are required, **in advance of taking any action**, to contact local Amgen management and the Law Department immediately to discuss the situation and permissible options.

Expenditures for Product Promotion and Related Activities

Certain expenditures, such as those required for travel, meals or lodging, for purposes of promoting, demonstrating or explaining products or services or executing or carrying out a contract are normally permitted, provided that the expenditures are reasonable and bona fide and are not made for the purpose of securing an improper advantage or corrupting a Foreign Government Official’s decision on awarding or continuing business. All such expenditures should be reasonable in amount and consistent with Amgen’s policies on expenditures of this kind in other contexts. In no event should they be made if it is believed that making them in any given instance will improperly influence a third party, including a Foreign Government Official.

Accounting Records and Internal Controls Procedures

The FCPA requires that Amgen and its affiliates maintain books and records that, in reasonable detail, accurately and fairly reflect corporate transactions. It also requires that Amgen establish a system of internal accounting controls to provide reasonable assurances that transactions are executed in accordance with management’s authorization and are properly recorded. Anti-corruption laws in other countries contain similar requirements.

In order to ensure compliance with the FCPA's books and records and internal controls requirements, Amgen's internal audit group will review the adequacy of the design and operating effectiveness (including transaction testing) of the system of internal controls established to ensure that all payments to government agencies or Foreign Government Officials are accurate, and have been properly authorized, reported and recorded. A sample of such payments will also be reviewed to assure compliance with the anti-bribery provisions of the FCPA. Any exceptions or possible violations of this Policy must be reported to local Amgen management (including the local compliance officer or representative), the Chief Compliance Officer, and the Law Department.

Sanctions for Violating Anti-Corruption Laws

The sanctions for violating anti-corruption legislation including the FCPA are severe. Sanctions may be applied not only to Amgen, but also to Amgen's directors, its shareholders and employees. Depending upon the offense, fines can be quite severe, and, in the case of an individual, a violation may lead to imprisonment for up to ten years. In the case of an FCPA violation, the U.S. Securities and Exchange Commission may also seek to impose an injunction.

Regardless of whether sanctions are imposed, a violation of anti-corruption legislation could seriously damage Amgen's reputation and image, which are among our most important assets.

Any exceptions or possible violations of this Policy must be reported to local management, the Chief Compliance Officer and the Law Department.

To Ensure Compliance with the FCPA and Similar Legislation, Covered Persons Should:

- **Consult with** your supervisor or the Law Department if you have the *slightest* doubt about the propriety of a payment or the giving of a gift or gratuity. Ask questions if the circumstances are at all unusual or unfamiliar.
- **Be sure** that all Covered Persons who have the opportunity to deal with Foreign Government Officials, or have the authority to make payments to Third Parties are aware of this Policy, understand it, have received *training* in it and agree to follow it.
- **Watch for "red flags"**, i.e., situations which don't "smell right," such as a payment or commission that is larger than is standard for the deal and when you are less than confident that no illegal payments will be made.
- **Make sure** that all agreements are in writing. If you are suspicious of the activities of the other party, consult your supervisor or the Law Department.
- **Conduct** Amgen business in compliance with the laws of all countries in which the company does business.
- **Comply with** generally accepted accounting principles and established internal accounting controls and procedures at all times.
- **Ensure** that all Amgen records reasonably, accurately and fairly reflect the transactions of Amgen and the disposition of its assets.
- **Investigate** the business reputation of any agent, consultant or distributor in high-risk countries or anywhere that you may have a concern to ensure the objectives of the engagement can be achieved without violating anti-corruption legislation. Consult with the Law Department if you are unsure whether such an investigation is appropriate, for guidance on factors to consider in an investigation, and for advice on records of investigation results that you may need to retain.

To Ensure Compliance with the FCPA and Similar Legislation, Covered Persons *Must Not*:

- Establish any undisclosed, secret or unrecorded funds or assets of Amgen.
- Make any false, inflated or artificial entries in the books and records of an Amgen company for any reason whatsoever.
- Use Amgen funds or assets for any unlawful, improper or unethical purpose.
- Falsify any accounting records or documents relating to any transaction in any way that may obscure or disguise the true nature of the transaction or activity.
- Lie to auditors. Do not make or approve payment on behalf of Amgen without adequate supporting documentation or with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment.
- Become involved in any arrangement or activity that results in any of the previously stated prohibited acts or may lead to a violation of the FCPA or other similar legislation.

This Policy is not intended to make Covered Persons experts on the requirements of the FCPA and similar legislation in other countries. Rather, it is designed to help Covered Persons recognize situations and payments that might raise legal issues under anti-corruption laws. It is important that each Covered Person with responsibilities that might give rise to potential liabilities under the FCPA and/or other similar legislation follow the guidelines contained in this Policy and work closely with the Law Department to avoid even the appearance of a violation.

If you have any questions or comments concerning this Policy or if you are aware of a situation that you believe may be unlawful or unethical, you should immediately contact the Chief Compliance Officer and 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.