

1. Scope

Applicable to all Amgen 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

The pharmaceutical and biotech industry’s interactions with healthcare professionals (“HCPs,” defined below) are subject to regulatory oversight around the globe. The laws that address this area are sometimes referred to as anti-kickback or sponsorship laws. For example, a number of United States (“U.S.”) federal and state laws and regulations, as well as laws and regulations in other countries, impose restrictions on economic benefits given by pharmaceutical and biotech manufacturers to HCPs. Penalties for violation of such laws and regulations can include imprisonment, criminal and civil fines, and/or exclusion from federal health care programs. Proper interactions with HCPs are essential.

It is Amgen’s policy to comply with all applicable laws and regulations governing interactions with HCPs. This Policy sets forth the requirements for interactions with HCPs.

Covered Persons interact with HCPs in a wide variety of situations across the company. It is important to understand that this Policy (and other Amgen governance documents covering interactions with HCPs) applies in all settings, including activities undertaken by Covered Persons involved in sales and marketing, product research and development, technical operations, and regulatory and governmental affairs. In addition, outside the U.S., Covered Persons who interact with HCPs must comply with applicable codes of practice, as required by local industry associations in which Amgen is a member.

Definition of HCP

For purposes of this Policy, HCPs include any healthcare provider and any other person or entity in a position to purchase, prescribe, recommend or arrange for the purchase, sale or formulary placement of an Amgen product, including, but not limited to, physicians and physician groups, nurses, office practice managers, dialysis center personnel, free standing or hospital based dialysis centers, wholesalers, hospitals, pharmacists, medical directors, practice management companies, pharmacy benefit managers, and group purchasing organizations, as well as any individual employed by such entities who is in a position to recommend, influence, or arrange for the purchase, sale, prescription or formulary placement of Amgen products.

Definition of Research

For purposes of this Policy, “Research” is defined as any activity intended to test the safety or effectiveness of Amgen’s products or to contribute to Amgen’s understanding of a product, product candidate, disease, therapeutic area, or treatment alternative. For purposes of this policy, Research includes, but is not limited to, pre-clinical studies, Amgen initiated clinical studies (regardless of phase), investigator initiated clinical studies (regardless of phase), drug or medicine utilization evaluations, patient registries, observational studies, analysis of existing data, or drug development alliances. Research includes activities that may not lead to definitive scientific results, but all Research must contribute to Amgen’s understanding of a product, product candidate, disease, therapeutic area, or treatment alternative.

General Rules

- Covered Persons must ensure that all interactions with HCPs are designed to fill a legitimate need on the part of Amgen, as more specifically addressed in relevant Amgen governance documents. These interactions include, but are not limited to, arrangements with HCPs for consulting projects, speaking engagements, donations, gifts and research activities. In no event shall Research activities be used as a way of promoting Amgen products.
- Covered Persons must not promise or provide anything of value for the purpose of encouraging or inducing any HCP to purchase, prescribe, use, or recommend Amgen products, to influence formulary status, where applicable, or to reward any such prior action.
 - Where permissible under applicable law, Amgen may elect to permit Covered Persons to provide items of de minimus value and/or samples, in Amgen's sole discretion. Covered Persons are required to comply with Amgen governance documents relating to such activities.
- Covered Persons must adhere to all functional area processes relating to any HCP interaction.
- Any and all compensation to HCPs for activities performed or services rendered on behalf of Amgen must be the result of arm's length negotiations between the appropriate Covered Persons and the HCP. All compensation or other remuneration for any activities performed, or any other services rendered by HCPs, must be commensurate with the services provided and reflect fair market value for the activities performed or services rendered. All such arrangements must be documented in writing.
- All written contracts with HCPs must contain a detailed description of the types of services to be provided, the standards to which such services are to be performed and the deliverables expected. Each contract must be compliant in the jurisdiction where the attendee is from. For events, relevant rules in the jurisdiction where the event is held must also be followed.

Specific Rules for Research

- All Research covered under this Policy must be reviewed and approved by an appropriate review body within Research & Development ("R&D").
- Amgen Global R&D personnel are responsible for the selection of investigators and institutions for Amgen Research. Amgen Sales & Marketing personnel may recommend investigators and institutions for Research, but must not participate in the ultimate selection of investigators and institutions.
- Amgen Sales personnel must not use or request lists of Research investigators from R&D. R&D personnel must not provide Sales personnel with lists of Research investigators.
- All Research agreements must be evidenced by a written contract that has been generated and approved 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) all applicable laws and regulations, 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) ensure 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 Amgen staff member has violated this Policy, applicable laws or regulations, or any governance documents, appropriate disciplinary measures will be taken, to the extent permitted by local laws. The following is a non-exhaustive list of possible disciplinary measures to which Amgen staff members may be subject (subject to local laws): oral or written warning; suspension; removal of job duties/responsibilities or demotion; reduction in compensation; and termination of employment.

Subject to local 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.