

Scope

This Policy applies to all Amgen Inc. and subsidiary or affiliated company staff¹ members, consultants, external workers, secondees, alliance members, and temporary staff worldwide. Consultants, external workers, secondees, alliance members, and temporary staff are not Amgen employees, and nothing in this Policy should be construed to the contrary. In jurisdictions that recognize “at-will” employment, this Policy does not change the at-will nature of employment at Amgen, its affiliates, or subsidiaries.

Although consultants, external workers (such as staff augmentation, project-based workers, and outsourced service providers), secondees, alliance members, and other external parties are accountable for adhering to the Standards of Business Conduct (as set forth below), they are not subject to the disciplinary actions delineated in this Policy. Rather, such individuals will be held accountable for adhering to these standards without prejudice to Amgen’s contractual rights and remedies under any existing agreements. Amgen will work with any such third party to determine and implement any corrective actions necessary to respond to, and prevent recurrence of, any violation of its Standards of Business Conduct.

This Policy also applies to any other person who is not listed in the categories mentioned above and wants to report potential misconduct, in so far as concerns the reporting channels and the protections granted for the reporter. The reporting channels and information regarding access to such channels are publicly available, so all parties are adequately informed of the possibility to submit a potential misconduct report.

The position of the person that submitted the report and/or the person to which the report refers shall not impact the manner in which the report is handled. The report may be submitted from any country/territory, without any geographical limitation.

Purpose

It is Amgen’s Policy to promote a culture of accountability for ethical business conduct, professional behavior, personal integrity, and adherence to acceptable business practices. Accordingly, Amgen expects compliance with: (1) its Code of Conduct and other policies,

¹ Staff shall include any person working for Amgen, irrespective if the relationship is formalized through an employment agreement or any other type of agreement or mandate, including employees, loaned employees, administrators/ directors/ executives, volunteers, interns, and in-house attorneys.

procedures, and governance documents, and (2) applicable laws and regulations including, but not limited to, those governing: (a) financial accounting, reporting, and disclosure; corporate tax; financial market & securities trading; interactions with government officials and members of the healthcare community; fair competition and trade practices; public procurement; prevention of money laundering and financing terrorism; product safety; environment protection; public health; data protection; and price calculation and reporting; and (b) the hiring, compensation, promotion, transfer, discipline, and termination of employees, and Amgen's relationship with consultants, external workers, and temporary staff.

A culture of compliance and ethical business conduct is best achieved in an environment that promotes open communication, including candid discussion of potential violations of Amgen's Standards of Business Conduct. This culture of compliance requires an effective process for you to raise questions or report potential violations regarding Amgen business conduct (including potential misconduct by others) without retaliation or intimidation. Managers are responsible for creating and maintaining a work environment that advances these objectives.

Another important component of this culture is the enforcement of compliance standards through appropriate disciplinary action. This Policy establishes guidelines that apply globally whenever disciplinary action is taken in response to violations of Amgen's Standards of Business Conduct. Local or regional work rules, policies, procedures, guidance, or similar governance documents related to disciplinary action may add to the principles articulated in this Policy, but may not deviate from these guidelines, unless required by local law. Any proposed deviations from this Policy, even if legally required, need the written approval of the Chief Human Resources Officer and the Chief Compliance Officer. A record of exception approvals will be maintained by Amgen Human Resources.

Policy

General Principles

You are required to adhere to Amgen's Standards of Business Conduct. Those requirements include, but are not limited to:

- engaging in conduct toward customers, government employees, vendors, and others that is in accordance with professional norms
- engaging in conduct that promotes a professional environment
- adhering to accepted industry standards for specific professions (e.g., attorneys and accountants) when functioning as such a professional for Amgen
- adhering to Amgen policies, standards, and procedures
- conducting business in a manner consistent with Amgen's Code of Conduct and Values
- detecting, preventing, and reporting known, reasonably suspected, or potential violations of Amgen's Standards of Business Conduct, or other serious wrongdoing or unethical conduct, including conduct inconsistent with the Amgen Values
- as applicable, cooperating fully with Amgen including with respect to an investigation into a possible violation of Amgen's Standards of Business Conduct (including making yourself available to investigators immediately as practicable upon request and providing complete and accurate information, including documents, recordings, other tangible information, and access to Amgen-issued electronic devices)
- complying with applicable laws, and regulations, including those mentioned above

Additional Expectations of Managers

In addition to adhering to Amgen's Standards of Business Conduct, all managers must:

- ensure their staff know and follow Amgen's Standards of Business Conduct applicable to their activities and timely complete required training
- promote compliance with and prevent violations of Amgen's Standards of Business Conduct
- create a culture that encourages staff to prevent problems, raise concerns, and report issues

Asking Questions About Compliance Requirements

You are encouraged to ask questions about Amgen's policies, procedures, and practices, especially if you are unsure whether an action, activity, or decision is consistent with Amgen's Standards of Business Conduct or good business ethics in line with the Amgen Values.

Reporting Possible Compliance Violations

Generally, matters that must be reported include good-faith concerns regarding compliance issues or misconduct, including, but not limited to:

- possible violations of law or regulation
- possible violations of Amgen Policy or other governance documents such as Amgen's written policies, standards, procedures, business practices, and manuals, including those regarding financial disclosures, accounting, accounting controls, and auditing matters
- any other serious wrongdoing or unethical conduct, including conduct that is inconsistent with the Amgen Values or Amgen's Code of Conduct

If you detect a possible violation of Amgen's Standards of Business Conduct or are otherwise made aware of a possible violation of Amgen's Standards of Business Conduct, you must report it through one of the avenues identified in this Policy and in Amgen's Code of Conduct (including the Business Conduct Hotline (BCH)). Amgen takes all reports of possible violations of Amgen's Standards of Business Conduct seriously, including determining whether investigation or remedial action is necessary.

In many jurisdictions, reports to the BCH may be made anonymously; however, local laws in some countries discourage or prohibit anonymous reporting. In addition, some countries restrict the scope of what may be reported via a hotline (for example, only reports of accounting and financial irregularities) or provide other specific rules. Consult the country specific Annex as well as the dialing instructions for country-specific rules. If there is no country specific Annex for your jurisdiction, the rules established in the main body of this Policy shall apply. In case of conflicting provisions, the country specific Annex shall prevail.

When you make a report to the BCH, you will be asked to provide details of the incident or issue being reported. To thoroughly investigate a report and facilitate follow-up questions, Amgen may need to ask you if you would be willing to disclose your identity and/or to provide additional information regarding the incident or issue being reported. If you decide not to provide such information, Amgen might not be able to investigate the matter fully and/or take remedial action.

Nothing in this Policy or other Amgen policies prohibits you from reporting possible violations of law or regulation to any federal, state, or local governmental agency or entity, or from making other disclosures that are protected under applicable law or regulation.

Prohibition Against Retaliation

This Policy prohibits any form of retaliation against or intimidation of anyone for their good faith:

- reporting of a potential violation of Amgen's Standards of Business Conduct
- objection to conduct that may constitute a potential violation of Amgen's Standards of Business Conduct
- participation in any investigation or other proceeding related to a potential violation of Amgen's Standards of Business Conduct
- engagement in any other conduct that may be considered protected activity under applicable law or regulation

This prohibition on retaliation or intimidation applies even if Amgen concludes the reported conduct did not constitute a violation of Amgen Policy (policies, standards, and procedures), Values or Code of Conduct, or the law.

If you retaliate against or intimidate anyone in violation of this Policy, you will be subject to disciplinary action, up to and including termination of employment, to the extent permitted by local laws. Retaliation against another person for reporting actual or potential violations of law or regulation, participating in an investigation or other related proceeding, or for any other act that may constitute protected activity may also subject you to criminal and/or civil liability under applicable law.

The prohibition against retaliation applies not only to the reporting persons, but also extends, where relevant, to: (i) someone who assists the reporting persons in making the report; (ii) third persons who are connected with the reporting persons and who could suffer retaliation in a work-related context, such as colleagues or relatives of the reporting persons; and (iii) legal entities that the reporting persons own, work for or are otherwise connected with in a work-related context.

The protection against retaliation and intimidation described in this Policy applies regardless of whether the report is sent through the channels mentioned, submitted directly to the competent authorities, or publicly disclosed.

Confidentiality

Reports will be treated as confidential where required by law. In the United States, while reports may not be held confidential, they will be treated with due discretion. Please consult the country-specific Annex for more information.

Disciplinary Actions of other Measures May Be Imposed for Violations of Amgen's Standards of Business Conduct

Failure to adhere to Amgen's Standards of Business Conduct may lead to disciplinary action or other measures, up to and including termination of employment, to the extent permitted by local laws. Examples of actions or omissions that may result in disciplinary action include, but are not limited to:

- authorizing or participating in a violation of, or requesting or directing another person to violate Amgen's Standards of Business Conduct, including, but not limited to:
 - offensive or inappropriate conduct toward customers, government employees, vendors, or others
 - failure to adhere to accepted industry standards for specific professions (e.g., attorneys and accountants) when functioning as such a professional for Amgen
 - conduct that fails to promote a professional environment
 - conduct that fails to adhere to Amgen's Code of Conduct or governance documents (such as written policies, standards, and procedures)
 - discrimination in any phase of the employment relationship on the basis of any legally-protected attribute, status, or characteristic, including, but not limited to: race, color, national origin, ethnicity, gender, gender identity, sexual orientation, religion, age, marital status, disability, and disabled veteran or veteran of war
 - harassment of any kind, including sexual harassment
 - intimidation or retaliation

- negligently failing to detect or prevent a violation of Amgen's Standards of Business Conduct
- failing to timely report a known, reasonably suspected, or potential violation of Amgen's Standards of Business Conduct or other serious wrongdoing or unethical conduct, including conduct inconsistent with the Amgen Values
- failing to cooperate fully with an investigation into a possible violation of Amgen's Standards of Business Conduct, including providing incomplete, inaccurate or dishonest information
- retaliating against or intimidating anyone for (1) reporting a possible violation of Amgen's Standards of Business Conduct, (2) preventing or opposing conduct in violation of Amgen's Standards of Business Conduct, or (3) cooperating in an investigation regarding such possible violations
- making a knowingly false accusation involving an alleged violation of Amgen's Standards of Business Conduct
- (for managers) failing to fulfill the managerial responsibilities described in this Policy

It is Amgen's practice to conduct an inquiry into an alleged violation of its Standards of Business Conduct in accordance with local procedures and applicable laws. To the extent permitted by applicable laws, Amgen reserves the right to take whatever disciplinary and other measures it determines in its sole discretion to be appropriate in any situation (subject to local legislation), including, but not limited to:

- feedback or coaching
- assignment of required additional training
- oral or written warning
- suspension with or without pay
- removal of job duties/responsibilities
- job re-level
- lower performance rating
- impact to compensation or other incentives
- termination of employment and/or

- disclosure of the wrongdoing to a government agency or other appropriate reporting authority

Decisions regarding disciplinary or other remedial actions are made by Amgen on a case-by-case basis after considering all facts and circumstances. You can be subject to disciplinary or other remedial actions regardless of your position, title, or tenure with the company. Factors that may potentially affect Amgen's determination of disciplinary or other remedial action, include, but are not limited to:

- the seriousness of the violation(s)
- the individual's employment history, including past adherence to Amgen's Standards of Business Conduct
- the individual's level of authority (i.e., the higher the position of authority, the more serious the consequences may be)
- the individual's self-reporting and/or cooperation throughout the investigation or review process leading up to the decision on disciplinary action and
- (for managers) the extent to which the manager directed, approved, or failed to take reasonable steps to detect or prevent violations of Amgen's Standards of Business Conduct or demonstrated responsibility and accountability for such violations.