

## 1. Scope

This Policy applies to all Amgen Inc. and subsidiary or affiliated company staff members, consultants, external workers, secondees, and temporary staff worldwide. Consultants, external workers, secondees, and temporary staff are not Amgen employees, and nothing in this Policy should be construed to the contrary.

## 2. Purpose

Amgen’s mission is to serve patients. The manufacturing and continuous delivery of Amgen products to patients involve exporting and importing transactions across many countries. Amgen is committed to following laws and regulations related to the export and import of goods, services, technology, software, and knowledge; and implementing the controls to avoid transactions with an individual or a company (each a “Sanctioned Party”) with whom trade is legally prohibited. Collectively, the applicable laws, regulations, and controls are hereto referred to as “Global Trade Laws and Regulations”.

This Policy sets forth the global requirements for the conduct of activities to ensure compliance with Global Trade Laws and Regulations. Violations of Global Trade Laws and Regulations may result in imported goods being rejected or seized, penalties and fines, the suspension of export privileges, reputational damage and/or loss of tax benefits or incentives for Amgen. Departures from Global Trade Laws and Regulations may also result in the imposition of civil and criminal penalties to you and/or Amgen. Your understanding of and compliance with this Policy and associated standards and procedures helps mitigate legal, regulatory, financial, and reputational risks to you and Amgen.

## 3. Definition

Term	Definition
Brokering Services	Arranging or negotiating transactions for the purchase, sale, or supply of Controlled Items.
Controlled Item	Knowledge, software, goods, and technology subject to Export Controls. For U.S. purposes, Controlled Items are included in the Commerce Control List published by the Bureau of Industry and Security, an agency of the U.S. Department Of Commerce
Controlled Technology	Specific information (e.g., technical data, encryption software, select agents, pathogens, and bioreactors) required for the development, production, or use of certain items that are controlled under Export Control regulations.
Export	Shipment or transmission of an item (including technology and know-how) out of the country or customs territory where it is presently located. Export also applies to oral transmission of technology when using audiovisual systems or telephones.

Term	Definition
Foreign Person	In the context of U.S. export controls laws and regulations, refers to a natural person who does not have a protected status (i.e., a U.S. citizen or national, U.S. lawful permanent resident, a person granted asylum or refugee status in the U.S., or a temporary resident). It also means any entity or group that is not incorporated in the U.S. or organized to do business in the U.S., as well as international organizations, foreign governments, and any agency or subdivision of a foreign government. For U.S. export controls laws and regulations, “foreign person” is synonymous with “foreign national”.
Import	To enter goods or services into a country from abroad.
Release of Technology	In the context of U.S. export control laws and regulations, a Release may occur through (i) visual inspection (e.g., viewing technical specifications, plans, blueprints, etc.), or (ii) through a conversation/exchange, or when made available by practice or application under the guidance of persons with knowledge of the technology. In addition, posting information to an unsecured shared drive or other network site (e.g., LAN, Box, SharePoint) may be deemed Release of Technology.
Re-Export	Shipment or transmission of a Controlled Item or Controlled Technology from one foreign country to another foreign country.
Transfer	For U.S. purposes, a deemed Re-Export occurs when Controlled Technology is released or transferred to a Foreign Person of a country other than the foreign country where the release or Transfer takes place.
Transit	Change from an end user to another end user of a Controlled Item or Controlled Technology. This can be a hand-off or movement of physical goods or electronic information.
Transshipment	Items passing through or above a country or customs territory with a destination outside of that country or territory in a short period of time.

## 4. Policy

It is Amgen's policy that you comply with all applicable Global Trade Laws and Regulations, this Policy, and associated standards and procedures (collectively "Trade Compliance") including, but not limited to, the following:

### **Import Controls**

Countries regulate the flow of goods, technology, and persons into their borders.

Import controls are imposed by means of restrictions, such as duties on imported goods, import licenses, and measures preventing entry of illegal or harmful items. Additionally, these controls establish the legal responsibility of the importer for declaring accurate information at the time of import.

You must exercise care when importing items to ensure that information provided to government authorities is accurate and complete, i.e., that correct and accurate product descriptions, values, origins, permits, and tariff classifications are used on all required documentation and in compliance with all applicable laws and regulations.

At time of import, the biotechnology industry is regulated by local government agencies or regulatory bodies, such as a country's Ministry or Department of Health. You must ensure adherence to country specific governmental regulations.

### **Export Controls: Exporting, Re-exporting, Brokering, or Transferring Controlled Items and Technology**

Countries in which Amgen operates, including but not limited to the U.S., Singapore, and the member states of the European Union (E.U.), have agencies or regulatory bodies promulgating and administering inter-related regulations that govern exports (collectively "Export Controls"). For example, the Bureau of Industry and Security within the U.S. Department of Commerce oversees and manages what is called the U.S. Export Administration Regulations (EAR). Likewise, the U.S. Office of Foreign Assets Control (OFAC) within the U.S. Department of Treasury administers and enforces economic and trade sanctions. Other countries have similar regulations to protect their national security and foreign policy interests.

Export Controls apply to items located in the U.S. (or other applicable country) and follow the item wherever it goes worldwide. This means that Export Controls continue to apply to items not only after they are first exported out of the country, but also when the items are transferred from one end-user to another end-user in the same country or Re-Exported. This also means that the Export Controls apply to Brokering Services to arrange for the Export, Transfer, Transit, or Re-Export of the Controlled Items or Controlled Technology.

In the U.S., Export Controls also apply to the Release of Technology or supply/transfer of technical data and know-how related to the design, development, production, manufacture, or test of certain Controlled Items to Foreign Persons, including Amgen employees, even within the United States. This Release of Technology and transfer of technical data and know-how is referred to as Deemed Export. Based on the nationality of the end-user, a Deemed Export may require special licensing.

Depending on the exporting country regulations and the destination country, shipping controlled items may require a license or authorization prior to shipping.

### **Economic Sanctions: Abstaining from Transactions with a Sanctioned Party**

Some countries have enacted laws and regulations to apply financial/economic sanctions to specified targets. These countries prohibit their citizens and businesses from engaging in transactions, directly or indirectly, with certain specified targets (e.g., business networks, entities, individuals, geographic regions, or entire nations). In many cases, these sanctions also prohibit the referral of business or facilitating transactions involving countries or persons subject to sanctions.

Prohibited activities with Sanctioned Parties include the Import, Export, Transshipment, and Transit of goods and services. It may also apply to facilitating these activities.

To enforce their financial sanctions laws, countries publish lists specifying each Sanctioned Party. The Sanctioned Parties Lists may include major airlines, banks, and investors, as well as persons involved in specified sectors or industries.

### **Anti-Boycott Laws and Regulations**

The U.S. and E.U. have anti-boycott laws that restrict the extent to which companies may participate in, or cooperate with, an international boycott. These regulations prohibit cooperating with unsanctioned boycotts (e.g., Amgen is prohibited from entering into agreements or transactions accepting or supporting the Arab League Boycott of Israel). Violations of anti-boycott laws and regulations may result in the loss of tax benefits for parties that engage in certain boycott-related agreements.

Anti-Boycott Laws and Regulations require reporting the receipt of boycott requests that have not been sanctioned. Amgen is required to comply with reporting requirements within specified timeframes.

You must not engage in activities in embargoed or sanctioned countries or territories. You must refrain from and report unsanctioned boycott requests, and must exercise care when reviewing and executing contracts, purchase orders, terms of sale, financial documents, certifications, employee information requests, visa applications, and import and export documents to ensure compliance with anti-boycott laws.