

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 is committed to the highest level of ethical business conduct, including compliance with applicable anti-bribery and anti-corruption (“ABAC”) laws and regulations. Amgen will compete lawfully and ethically in the marketplace and expects you to conduct all aspects of Amgen business lawfully and with integrity.

Many countries in which Amgen does business have enacted ABAC laws and regulations. Examples include, but are not limited to, the United States’ Foreign Corrupt Practices Act (“FCPA”), United Kingdom’s Bribery Act (“UKBA”), and Brazil’s Clean Company Act (“BCCA”). These laws and regulations share many similar requirements including extraterritorial applications but vary in certain respects.

The sanctions for violating applicable ABAC laws and regulations 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 also lead to imprisonment.

Regardless of whether sanctions are imposed, a violation of ABAC laws and regulations could seriously damage Amgen’s reputation and image, which are among our most important assets.

This Policy covers Amgen’s general principles and standards relating to ABAC compliance and maintenance of business documentation and financial records. It reinforces that we have no tolerance for bribery or corruption and that we are committed to maintaining accurate records of our business dealings. All of us are responsible for preventing any instance of bribery or corruption and for reporting any concern or suspicion.

3. POLICY

General Principles

You must not:

- Directly or indirectly (i.e., through a Third Party (defined in section 3.3)) offer, promise, authorize, or give anything of value (e.g., payments, gifts, meals, entertainment, travel, discounts, commissions, employment, etc.) in order to obtain an improper advantage by influencing the judgment or conduct of a person, or cause anyone to act against their lawful duties.

- Directly or indirectly solicit, request, or accept anything of value intended to improperly influence your judgment or conduct in your job responsibilities.

You must:

- Understand and comply with Amgen’s ABAC principles and standards, as well as with all applicable ABAC laws and regulations; and
- Abstain from any activities that might violate or give any appearance of intention to violate such standards, laws, and regulations.

These general principles do not distinguish between Government Officials (defined in section 3.2) and private individuals, or commercial and non-commercial activities. Seek guidance from the Law Department, Compliance Leads, Chief Compliance Officer, and/or through the Business Conduct Hotline in any circumstances where doubt exists as to the appropriateness of proposed conduct.

Interactions and Engagements with Government Officials

As a global biotechnology company, Amgen must be particularly sensitive to interactions and engagements involving Government Officials, whether directly or indirectly through Third Parties. The term “Government Official” is broadly interpreted under ABAC laws and regulations. Some laws and regulations may also use the term “Foreign Official”. For purposes of this Policy, Amgen uses the term “Government Official” to refer to both categories. In this Policy, “Government Official” means any officer or employee of a government or any department or instrumentality of a government (e.g., government-owned or controlled businesses such as hospitals), any officer or employee of a public international organization (e.g., World Health Organization, United Nations, etc.), and any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality, or for or on behalf of any such public international organizations. Amgen has also defined the term “Government Official” to include any political party or candidate for political office and their representatives.

Under various ABAC enforcement actions, certain healthcare professionals have fallen within the ABAC laws and regulations definition of “Government Official”. This category of healthcare professionals includes those who are employed by, teach at, or have privileges at government-owned or controlled hospitals or public universities. In keeping with its commitment to the highest level of ethical business conduct, Amgen applies this broad interpretation of “Government Official” in this Policy and expects you to do the same.

You must not give Government Officials anything of value in order to improperly influence them to advance Amgen’s commercial interests such as obtaining restricted information from the government, securing favorable regulatory treatment, and obtaining favorable government procurement activities (e.g., tender arrangements for the supply of Amgen products). Some unacceptable practices to obtain favorable government procurement outcomes include: offering/discussing the possibility of employment at Amgen, offering/discussing business opportunities with procurement/regulatory personnel, and offering gratuities in connection with procurement.

Working with Third Parties

A Third Party is any non-Amgen individual, party, or entity with whom Amgen interacts or engages to conduct business; this category includes, but is not limited to, distributors, business partners,

promotional/marketing agencies, travel agencies, meeting organizers, contract sales force, clinical research organizations, functional service providers, investigators, and customs brokers.

Although there are legal distinctions between Amgen and Third Parties (under corporate, employment, and tax laws, for example), law enforcement agencies have held companies accountable for acts of their Third-party business partners in certain situations regardless of the way in which the legal relationship with the Third party was structured. Thus, it is important to recognize that while Third Parties can be important to Amgen's business success, law enforcement agencies may hold Amgen responsible for Third Parties' misconduct.

We must take particular care to ensure Third Parties engaged by Amgen do not breach the requirements of this Policy. To that end, Amgen must only engage Third Parties after conducting appropriate due diligence into the Third Parties' reputation, qualifications, and associations in accordance with any applicable Amgen procedures in advance of the engagement. Further, compensation provided to Third Parties should be in return for their legitimate services or goods.

Questions regarding whether a person or entity qualifies as a Third Party under this Policy should be directed to the Law Department, Compliance Leads, Chief Compliance Officer, and/or through the Business Conduct Hotline.

“Facilitating” or “Expediting” Payments

Occasionally, you may be asked by low-level bureaucrats or other Government Officials for a payment to persuade them to perform their administrative, non-discretionary functions (e.g., processing of routine paperwork, visas, applications, or clearance of goods through customs, etc.). These are often referred to as “facilitating” or “expediting” payments. These payments are illegal in most countries, and Amgen prohibits you from paying, offering, or authorizing such payments or offers, whether directly or indirectly, through Third Parties. All requests or demands for facilitating or expediting payments must be reported in accordance with the reporting obligations set forth below.

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 bona fide (i.e., are true and reasonable and have a legitimate business purpose), are not made for the purpose of securing an improper advantage or improperly influencing anyone's decision on awarding or continuing business, and do not otherwise violate this or any other Amgen policy or law. All such expenditures must be reasonable in amount and consistent with Amgen's policies on expenditures of this kind in other contexts. In no event should expenditures be incurred where doubt exists as to the appropriateness of the purpose of the expense.

Accounting Records and Internal Controls Procedures

It is Amgen's policy to keep books and records that accurately and fairly reflect Amgen's transactions in reasonable detail and to maintain internal controls to prevent and detect potential violations of Amgen's policies or of applicable laws.

No false or artificial entries may be made in the books and records for any reason, and all payments and transactions, regardless of value, must be recorded accurately and comply with generally accepted accounting principles and established internal accounting controls and procedures. This includes, but

is not limited to, Third-Party reimbursements of previously agreed upon (i.e., pre-approved) expenses. Amgen also expects that any records provided by Third Parties to Amgen will be accurate and include reasonable detail and adequate supporting documentation. You must also ensure that all agreements are in writing and that services are properly described.

You must also watch for “red flags” such as payments, discounts, or commissions that are unusually structured or larger than is standard for the deal, which may not be appropriate and for legitimate business purposes.