

1. Scope

Applicable to all Amgen Inc. and subsidiary or affiliated company staff members, consultants, contract workers, secondees and temporary staff worldwide (“Covered Persons”). Consultants, contract workers, secondees, and temporary staff are not Amgen employees, and nothing in this Policy should be construed to the contrary.

2. Policy

Consistent with Amgen’s duties to its shareholders, business decisions must be made with the Company’s best interests in mind and without regard to a Covered Person’s personal benefit. Covered Persons therefore are prohibited from engaging in any activity, practice, or relationship that creates or could be perceived to create a conflict with Amgen’s interests.

This Policy sets forth requirements for proper handling of situations that may present or create the appearance of a Conflict of Interest, as defined below.

2.1 Definitions

A “**Conflict of Interest**” exists any time a Covered Person permits any interest other than the Company’s interest to influence the manner in which he or she conducts Amgen business. Examples of a Conflict of Interest include, but are not limited to, the following:

- Misuse of a Covered Person’s position with Amgen for personal gain or the gain of someone with whom the Covered Person has a close, personal relationship (e.g., a friend or family member);
- Outside employment or business activities contrary to Amgen’s business interests (e.g., employment with a competitor of Amgen or supplier to Amgen or prescriber of Amgen products);
- Referral of or improperly influencing the referral of Amgen business to any entity controlled by a Covered Person or someone with whom the Covered Person has a close, personal relationship (e.g., a friend or family member); or
- Soliciting or accepting a Gift from any person or firm doing or seeking to do business with Amgen unless such acceptance is allowed under the “Cultural Courtesy Gifts Exception” set forth below.

For purposes of this Policy, a “**Gift**” is any good or service provided to a Covered Person for his or her personal enjoyment, including but not limited to, tickets to sporting events, meals, and/or entertainment. A Gift, however, does not include a meal covered by any person or firm doing or seeking to do business with Amgen if provided in the ordinary course of business (i.e., reasonably-priced lunches and dinners that are neither intended nor likely to be perceived as intended to influence Amgen’s business decisions).

2.2 Avoiding Conflicts of Interest

Covered Persons must use care to avoid any Conflict of Interest, as well as the appearance of a Conflict of Interest in any situation where a reasonable person may question whether the Covered Person was influenced by interests other than Amgen’s interests. To avoid a Conflict of Interest or even the perception of one, Covered Persons must do the following:

2.2.1 Gifts

Covered Persons may not solicit or accept a Gift from any person or firm doing or seeking to do business with Amgen. If a Covered Person receives such a Gift, the Covered Person must return it with a note of explanation. If returning the Gift is not practical, the Covered Person must dispose of the Gift without obtaining personal gain.

Cultural Courtesy Gifts Exception: Covered Persons may accept a Gift on behalf of Amgen from any person or firm doing or seeking to do business with Amgen if refusal of the Gift would likely cause cultural offense or embarrassment. In these rare instances, Covered Persons may accept the Gift provided that the following all apply:

- The receipt of the Gift is legal and customary or ceremonial in that culture;
- The Gift is of nominal value (e.g., ceremonial tea sets or plates, New Year's calendars, baby gifts, perishable goods, etc.);
- The Gift is not cash or a cash equivalent (e.g., a check or pre-paid debit card);
- The Gift is neither intended nor likely to be perceived as intended to influence the Covered Person's business decisions on behalf of Amgen;
- The Covered Person informs his or her manager of the Gift; and
- The Covered Person does not sell the Gift.

2.2.2 Third-Party Business Engagements

Covered Persons must deal with all suppliers, customers, and other third parties doing business or seeking to do business with Amgen in an objective, professional, and fair manner and in accordance with applicable policies and guidelines. Covered Persons may not seek nor accept, directly or indirectly, any payments, fees, loans, or services from any person or entity as a condition of, or result of, their doing business with Amgen. Accordingly, Covered Persons must recuse themselves from all business decisions with third parties that in any way relate to the Covered Person's personal interests (financial or otherwise) or the interests of someone with whom the Covered Person has a close, personal relationship (e.g., a friend or family member). Covered Persons may not negotiate with, engage, retain, or hire someone with whom they have a close, personal relationship or influence decisions related to negotiating with, engaging, retaining, or hiring such individuals. Covered Persons must disclose any such potential Conflict of Interest related to these business decisions and engagements pursuant to Section 4.0 below.

2.2.3 Financial Interests

A Covered Person may not hold any financial interest in any firm or corporation that is a competitor of Amgen if such interest may influence any decision that the Covered Person might make in the performance of his or her Amgen responsibilities. Covered Persons, however, need not sell stock that they own in any firm or corporation that is a competitor of Amgen, unless such interest may influence any decision that Covered Persons might make in the performance of their Amgen responsibilities. Covered Persons also must comply with Amgen's Insider Trading Policy.

2.3 Other Employment and Business Activities (Applicable to Staff Members Only)

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Certain types of other employment and business activities performed outside of Amgen (i.e., for a person or entity other than Amgen) present a potential Conflict of Interest. If such an engagement presents a potential Conflict of Interest, staff are required to obtain advance written consent from Amgen. This section informs staff of which employment and business activities pose a potential Conflict of Interest and therefore require advance written consent.

Note, however, that regardless of whether advance written consent is required, staff who participate in any outside employment or business activity must adhere to the following requirements:

- Participation in outside employment and business activities may not interfere with a staff member's regular work hours or ability to perform his/her job duties
- If staff work in any capacity with an outside organization, they may not be involved in any decisions related to (1) the donation of Amgen funds or other benefits to that organization, (2) treatment guidelines, (3) formulary placement, (4) the prescribing or purchase of Amgen products, or (5) medical education or other types of education provided to that organization; however, this prohibition does not apply to non-profit entities directly sponsored or controlled by Amgen, such as The Amgen Foundation and Safety Net Foundation.

2.3.1 Employment or Businesses

Employment or other business engagements outside of Amgen (i.e., for a person or entity other than Amgen) pose a potential Conflict of Interest only if the activities relate to (1) Amgen's business or industry or (2) the staff member's position or job duties at Amgen. Other types of employment or business engagements (e.g., teaching a class unrelated to Amgen's industry or your job, such as an art class; working in the retail or food industries; selling your own arts, crafts, clothing, or jewelry; photography, etc.) generally do not pose a Conflict of Interest and therefore do not require advance written consent from Amgen.

2.3.2 Volunteer Activities

Volunteer activities pose a potential Conflict of Interest only if the activities relate to (1) Amgen's business or industry or (2) the staff member's position or job duties at Amgen. Staff should be particularly cognizant of a potential Conflict of Interest when volunteering for organizations in the healthcare community. Other volunteer activities (e.g., coaching a child's sports team, working on community fundraising initiatives, etc.) generally do not pose a Conflict of Interest and therefore do not require advance written consent from Amgen.

2.3.3 Board of Directors and Advisory Boards

All requests to serve on a board of directors or advisory boards with for-profit organizations require advance written consent from Amgen, specifically, the Senior Vice President of Human Resources. Additionally, board service with not-for-profit organizations requires advance written consent from Amgen only if the board service relates to (1) Amgen's business or industry or (2) the staff member's position or job duties at Amgen. Other not-for-profit board service (e.g., serving on the board of directors for a not-for-profit theatre arts organization) generally does not pose a Conflict of Interest and therefore does not require advance written consent from Amgen.

2.3.4 Publications

If a staff member prepares a publication as part of his/her job duties for Amgen, no advance written consent is required. Other sections of this Policy, however, such as restrictions on the acceptance of

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payments, still apply. Additionally, Amgen's publications SOP, including the requirement that publications be reviewed through the Final Publication Review (FPR) process, may apply.

If a publication is not part of a staff member's job duties for Amgen, the activity poses a potential Conflict of Interest and requires advance written consent from Amgen only if it relates to (1) Amgen's business or industry or (2) the staff member's position or job duties at Amgen. Other publications (e.g., writing a children's book) generally do not pose a Conflict of Interest and therefore do not require advance written consent from Amgen. Under such circumstances, however, staff may not refer in the publication to Amgen, Amgen's business or industry, or their position or job duties at Amgen.

2.3.5 Presentations

If a staff member gives a presentation (e.g., speaking engagement, lecture, expert panel, etc.) as part of his/her job duties for Amgen, no advance written consent is required. Other sections of this Policy, however, such as restrictions on the acceptance of payments and/or fee waivers or reductions, apply. Additionally, all such materials must be reviewed through the appropriate process, such as the Final Publication Review (FPR) process or Medical Material Review Process, as applicable.

If a presentation is not part of a staff member's job duties for Amgen, the activity poses a potential Conflict of Interest only if it relates to (1) Amgen's business or industry or (2) the staff member's position or job duties at Amgen. Other presentations (e.g., presenting on fundraising activities by the Salvation Army) generally do not pose a Conflict of Interest and therefore do not require advance written consent from Amgen. Under such circumstances, however, staff may not refer in the presentation to Amgen, Amgen's business or industry, or their position or job duties at Amgen.

2.3.6 Conferences or Meetings

Staff members frequently attend non-Amgen sponsored conferences or meetings related to (1) Amgen's business or industry or (2) the staff member's position or job duties at Amgen. Before attending such conferences or meetings, staff members must obtain approval from their manager. Other approvals, such as Travel Activity and Conference (TEAC) Approval, also may apply. Advance written consent from Human Resources is not required, however.

Staff may not accept money or other benefits for attending a conference or meeting related to Amgen's business or industry or the staff member's position or job duties at Amgen, even if the staff member attends for reasons other than as a general attendee (i.e., as a guest speaker). If attendance at a conference or meeting benefits Amgen, as determined by the staff member's manager, the staff member may accept a waiver or reduction in registration or event fees and accept incidental meals generally offered to attendees by the conference or meeting host.

3. Covered Persons Responsibility for Compliance

Every Covered Person worldwide is required to follow and employ reasonable steps in preventing violations of (1) the Amgen Code of Conduct, (2) laws and regulations applicable in the relevant jurisdictions, and (3) Amgen policies and other governance documents applicable to him or her.

Covered Persons are also required to report any conduct that may violate such laws, regulations, the Amgen Code of Conduct, and Amgen policies and other 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. 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) applicable laws and regulations, (2) know the Amgen Code of Conduct and Amgen policies and other governance documents applicable to the activities they manage or supervise, (3) ensure their direct reports have appropriate training on compliance requirements to perform their job functions, and (4) 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 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.