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

Amgen is committed to conducting operations in an environmentally responsible way aimed at pollution prevention and environmental sustainability, the prevention of work-related injuries, and making health, safety, and environmental stewardship a fundamental part of how Covered Persons perform work at Amgen.

Covered Persons must comply with all environmental, health, safety, and sustainability regulations and laws and Amgen’s environment, health, safety, and sustainability standard operating procedures, protocols, prevention plans, and guidance applicable to their work for Amgen (collectively, “EHSS Laws, Regulations, and Controls”).

Management must ensure that a safe and healthy workplace is provided by Amgen or, as applicable and appropriate, by third parties performing work at Amgen premises and that the environmental impact is mitigated. The foregoing notwithstanding, nothing in this Policy shall be construed to limit third parties’ obligations to their personnel performing work at Amgen (whether such personnel are employees of the third parties or not).

It is Amgen’s policy to support compliance with EHSS Laws, Regulations, and Controls and management’s provision of the above-mentioned safe workplaces and environmental impact mitigation by implementing a management system for environment, health, safety, and sustainability (EHSS) performance consisting of the following elements:

2.1. Design for EHSS

Facilities, products, processes, ad business decisions, including organizational as well as physical changes, proactively address EHSS in the design.

2.2. Manage Risk

EHSS risks and impacts are evaluated and mitigated through, as appropriate, elimination, prevention, control, or reduction.

2.3. Integrate EHSS into the Business

A culture of EHSS compliance and continuous improvement is integrated with the organization through consultation and participation of workers, operational controls, documentation, and effective training.

2.4. Learn from Defects

Substandard and defective performance and failures are reported, responded to, investigated, analyzed, and learned from, through knowledge management.

2.5. Improve Performance

Performance is measured, verified, overseen, and improved with the use of leading and lagging indicators. Performance against internal and external commitments is monitored and achievements reported transparently, with the ultimate goal of continual improvement.
2.6. Governance

Management analyzes data to identify and escalate compliance issues, company commitments, and opportunities for improvements, set goals and communicate expectations with clearly defined roles and responsibilities.

3. Covered Persons Responsibility for Compliance

Every Covered Person 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.