

1. Scope

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

2. Policy

Covered Persons should consistently demonstrate ethical business conduct, professional behavior, adherence to acceptable business principles, personal integrity and compliance with applicable laws and regulations.

It is Amgen’s policy to comply with all applicable laws and regulations relating to workplace conduct. This Policy sets forth requirements for appropriate conduct in the workplace and compliance with applicable standards of professionalism. This Policy is not intended to describe every law, regulation, or Amgen policy that may apply to Covered Persons. Ultimately, the conduct of Covered Persons will be judged by whether such conduct complies with applicable laws, regulations, and Amgen policy.

General Guidelines for Professional Conduct

The following is a non-exhaustive list of types of conduct that are prohibited. Staff must also consult the General Business Conduct Policy for additional guidance.

- Offensive conduct toward customers, government employees, vendors or others;
- Failure to adhere to accepted industry standards for specific professions (e.g., physicians, attorneys, and accountants) when functioning as such a professional for Amgen;
- Conduct that fails to promote a professional environment;
- Discrimination in any phase of the employment relationship on the basis of any legally-protected attribute, status, or characteristic, including at a minimum, 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; and
- Intimidation or retaliation that violates the Compliance Reporting and Non-Retaliation Policy.

This conduct prohibition applies to behavior in person, via telephone, online (including social media) or directed through a Covered Person’s delegate.

Compliance with Laws and Amgen Policies

Amgen requires compliance with Amgen governance documents, all U.S. federal, state and local laws and regulations, and the laws and regulations of other countries governing employment practices, including laws regulating the hiring, compensation, promotion, transfer, discipline, and termination of any Amgen employee or dealings with Amgen consultants, contract workers and temporary staff. Nothing in the above non-exhaustive list of prohibited conduct limits or prevents any individual from engaging in activity protected by law (for example, reporting to law enforcement officials any suspected violation of law).

3. Covered Persons Responsibility for Compliance

Every Covered Person worldwide is required to follow (1) the Amgen Code of Conduct, (2) laws and regulations applicable in the relevant jurisdictions, and (3) Amgen governance documents applicable to him or her, including without limitation, those relating to this Policy. Covered Persons should exert due diligence in preventing violations of such laws, regulations, and 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.

Amgen expects its managers to (1) be familiar with (or take appropriate steps to become familiar with) the laws, regulations, and Amgen governance documents applicable to the activities they manage or supervise, (2) ensure their direct reports have appropriate training on compliance requirements to perform their job functions, and (3) 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.