



## Political Engagement Report

Our political interactions begin with our mission to serve patients by developing, manufacturing, and delivering drugs that treat serious illnesses in mind. This work takes place in a highly regulated environment and the decisions made by executive, legislative, and regulatory bodies can have a significant impact on our ability to serve patients. In the course of our regular engagement with our stakeholders, we were requested to provide specific information about our political engagement and the discussion below is in response to those requests. More detail on our political engagement strategy generally can be found at Amgen.com in our “Political Contributions” section located [here](#) and our “Business Ethics and Compliance” section located [here](#).

### Responsible Oversight and Governance of Political Engagement by Our Board, its Committees, and Our Executives

Our Board, its committees, and our executives, oversee our political engagement, positions on important public policy issues, policies on political expenditures, and our political contributions. The Corporate Responsibility and Compliance Committee (“CRCC”) of our Board of Directors (composed of independent outside directors) oversees our government affairs activities, including our political contributions (including PAC activity compliance), public policy positions with respect to pending legislative or other initiatives, as well as the processes by which we make charitable contributions, including the activities of The Amgen Foundation and the Amgen Safety Net Foundation.<sup>1</sup> The CRCC provides regular updates to the Board of Directors. Our executive management provides regular updates to the Board and its committees.

Our employees voluntarily fund and we administer a political action committee (“PAC”) governed by a board of directors, composed of Amgen executives, that oversees all PAC activities. The members of the PAC board are executives who represent a diverse cross-section of experience and functional areas within the Company. PAC contributions are considered and approved in advance by the Senior Vice President, Global Government Affairs and Policy, with the oversight of the PAC board. The PAC treasurer (or designee) and our compliance vendor review each contribution for budgetary and legal compliance. All PAC activity is also audited by a third-party firm on a regular basis.

Our Senior Vice President, Global Government Affairs and Policy, leads the Global Government Affairs and Policy (“GGA&P”) team with the oversight by the CRCC. Our GGA&P team participates responsibly and constructively in the legislative process by educating elected officials and other policymakers in Washington, D.C., and in state capitols around the U.S. about public policies that are consistent with our mission to serve patients.

### Our Forms of and Approaches to Political Engagement

Our political engagement has three primary forms:

#### 1. Contributions to Candidates

**Political Action Committee:** Our PAC participates in the political process by making contributions to federal and state political candidates and committees. Our decisions regarding who the PAC supports are made with our mission to serve patients in mind and without regard for the personal political preferences of members of Amgen’s Board of Directors, the PAC Board, executives, or our GGA&P team.

**Candidate Contributions:** When permitted, we also support political contributions to candidates running for state or local offices who share our perspectives on public policies that impact our ability to support our mission to serve patients. In certain circumstances, we may also contribute to other state-level political committees.

#### 2. Lobbying

Issue-based advocacy or “lobbying” is an important way in which we educate lawmakers and regulators about our business interests and those of our stockholders, employees, and communities.

We are committed to complying with all applicable laws, rules, and regulations that govern our public policy advocacy. Lobbying is highly regulated in the U.S. through a variety of state and federal registration and reporting laws. We require

---

<sup>1</sup> The Amgen Foundation, Inc. and The Amgen Safety Net Foundation are separate legal entities funded entirely by Amgen.

that our employees and outside firms comply with the Lobbying Disclosure Act and Honest Leadership and Open Government Act.

### **3. Trade and Industry Associations**

In addition to the Company's own public policy advocacy, Amgen also maintains memberships in trade and industry associations that champion scientific innovation and patient access to new and existing therapies and whose missions align with Amgen's business and policy interests. Our participation in trade and industry associations can offer significant benefits by providing access to business, technical and industry benchmarking data and standard-setting expertise, and by advancing our business interests.

#### **Considerations We Use in Evaluating Potential Recipients of Political Contributions and Memberships in Trade and Industry Associations**

We evaluate our political contributions and memberships in trade and industry associations regularly and contributions are guided by our mission to serve patients. We are steered by our values, accessible [here](#), and our Code of Conduct, accessible [here](#).

We seek to support candidates whose voting records and positions are supportive of our mission to serve patients. When evaluating contributions, we consider factors that include:

- Position and voting record on issues important to Amgen and its industry;
- Whether the candidate is expected to hold a leadership position or serves on a committee;
- Whether the candidate represents or seeks to represent communities in which we have facilities or significant business operations; and
- That the candidate has not made or engaged in egregious or inflammatory remarks or actions that are inconsistent with the Amgen values.

Individual contributions are made without regard to the personal political preferences of individual executives or other employees. No single issue or criteria category determines whether a candidate does or does not receive a contribution. Political contributions are evaluated every election cycle and, where we may have supported a candidate in one election cycle, we may elect to support a different candidate in the next election cycle.

Before joining a trade or industry association, our GGA&P team reviews the proposed membership to ensure it aligns with Amgen's mission and business interests. We also regularly re-evaluate our memberships in trade and industry associations to determine that they continue to serve the long-term interests of our Company, stockholders, employees, and communities, and that the overall benefit of memberships in these associations outweighs differences that from time to time arise. Given the wide range of issues addressed by these associations, we recognize that candidates and trade or industry associations may engage in a broad range of other issues that extend beyond the scope of what is of primary importance to us in our mission to serve patients and our positions will not always align entirely with those of the trade or industry associations to which we belong. From time-to-time, we advise the trade or industry associations in which we participate of our views on certain broader public policies or regulatory issues.

#### **Political Contributions Transparency**

Since 2007, corporate political and PAC contributions have been actively disclosed in our semi-annual report on our website located [here](#). All PAC disbursements are also publicly disclosed monthly and available on the website of the [Federal Election Commission](#).

Further, at the federal level, we file a quarterly report that lists the issues on which we have conducted federal lobbying activities with the Office of the Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate. These quarterly lobbying activity reports are available in the [House](#) or [Senate databases](#). Additionally, we expect any third parties with which we are affiliated and that engage in federal lobbying activities to report these activities. Annually, we post a list of states where we file lobbying reports and, to the extent available, either links to the reports filed with each state or links to state websites where such information can be found. Our most current report of such state lobbying information can be found [here](#).

A table identifying each U.S. trade association that received dues payments of greater than or equal to \$50,000 from us, the portion of these payments identified by the trade association as being used for lobbying expenditures, our priority policies, and alignment with our mission to serve patients is presented [here](#).

## **Our Annual Review of Lobbying Support and Political Contributions and Results**

We annually analyze the alignment of our Lobbying Support and political contributions during the preceding year in accordance with the considerations discussed above. This review for 2023<sup>2</sup> resulted in the finding of no instances of substantial misalignment between our mission to serve patients and our Lobbying Support or the positions of a candidate to whom we had provided our political support.

## **Other Forms of Political Engagement and Our Ethical Business Conduct**

### **Contributions to Section 527 Organizations and Independent Expenditures**

We understand the term “527 organizations” to refer to political organizations created under Section 527 of the Internal Revenue Code other than political action committees and candidate or party committees. We have not made any direct federal independent expenditures.

### **Anti-Bribery and Anti-Corruption**

We are committed to the highest level of ethical business conduct, including compliance with applicable anti-bribery and anti-corruption laws and regulations. At their core, these laws and regulations make it illegal to offer, pay, ask for, or receive anything of value in return for inappropriate advantages. This extends to third parties we have engaged to support our business worldwide. Our Code of Conduct, accessible [here](#), does not tolerate acts or attempts to improperly influence government personnel or private individuals to secure improper advantage for our commercial interests.

### **International Government Affairs**

Outside the U.S., rules governing interactions with policy makers vary by country. We have implemented internal policies regarding compliance with all applicable laws and regulations in countries where relevant interactions with policy makers occur, including the U.S. Foreign Corrupt Practices Act (FCPA). Our Code of Conduct, accessible [here](#), provides further information on our policies.

---

<sup>2</sup> Horizon Therapeutics plc was excluded from our 2023 review given the October 2023 timing of this acquisition.