

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

Consistent with Amgen's responsibilities to its shareholders, business decisions must be made with the best interests of Amgen in mind and without regard to personal concerns.

It is Amgen's policy that Covered Persons must avoid situations or relationships that may be harmful or detrimental to the best interests of Amgen and might result in a conflict of interest. This Policy sets forth the requirements for proper handling of situations that may give rise to (or create the appearance of) a conflict of interest.

Definition of Conflict of Interest

A conflict of interest exists any time an individual subject to this Policy permits the prospect of personal gain to improperly influence the manner in which he or she conducts Amgen's business. Examples of such conflicts include (*but are not limited to*):

- Misuse of a Covered Person's position with Amgen for his or her personal gain;
- Outside employment with a competitor of Amgen;
- Referral of Amgen business to a firm controlled by other Covered Persons, the Covered Person's family, or a person with whom the Covered Person has a close, personal relationship; or
- Soliciting any gratuities, or receiving greater than nominal gratuities, from customers or suppliers of Amgen.

Basic Prohibition

Covered Persons are prohibited from engaging in *any* activity or practice:

- In conflict with the interests of Amgen; or
- Which could be *perceived* as creating a conflict with Amgen's interests.

Guidance for Avoiding Conflicts of Interest

In order to avoid actual conflicts, and minimize the possibility or appearance of conflicts of interest, Covered Persons must:

- Deal with all suppliers, customers and all other persons doing business with Amgen objectively, professionally and fairly.
- Not seek nor accept, directly or indirectly, any payment, fees, loans or services from any person or firm as a condition of or result of their doing business with Amgen.
- Not accept gifts that have a reasonable market value of more than \$200 (or less, if otherwise instructed by his/her management) from any person or firm doing or seeking to do business with Amgen, without approval by a Vice President. Such gifts must be returned with a note of explanation.

- Gifts include, but are not limited to, tickets to sporting events, meals, entertainment, or other goods or services.
- Covered Persons in doubt about whether accepting a particular gift would violate this Policy are required to seek the guidance of their Vice President, or, if a Vice President, of the next level manager, before accepting it.
- Not allow themselves to be placed in a position where a conflict of personal interest and Amgen's interest exists or appears to exist.
 - Covered Persons must use care to avoid even the appearance of impropriety, where a reasonable person would question whether he or she was influenced.
 - Thus, where the circumstances surrounding the acceptance of a gift with a reasonable market value of \$200 or less may create the appearance of a conflict of interest, acceptance of that gift is a violation of this Policy.
- Not do business on behalf of Amgen with a relative or a person with whom such Covered Person has a close, personal relationship, including negotiating with, engaging or hiring such individuals, or being involved in decisions related to engaging or hiring such individuals.
 - If a relative or a person with whom a Covered Person has a close, personal relationship is negotiating with Amgen to do business, then the Covered Person must disclose the relationship to his or her supervisor or others involved in the negotiations.
- Not hold any financial interest in any firm or corporation which is a competitor of Amgen, or which does or seeks to do business with Amgen, if such interest may influence any decision that Covered Persons might make in the performance of their Amgen responsibilities.
 - Covered Persons do not have to sell stock that they own (at the time an actual or potential conflict of interest arises) in the above companies or in any firm or corporation which is a competitor of, or which does or seeks to do business with, Amgen, ***unless such interest may influence any decision that Covered Persons might make in the performance of their Amgen responsibilities.***
 - Covered Persons must also comply with Amgen's *Insider Trading Policy*.
- Not accept money for attending a conference or meeting. If attendance benefits Amgen, as determined by the Covered Person's manager, the Covered Person may accept a waiver or reduction in registration or event fees and incidental meals generally offered to attendees by a third party hosting the conference or meeting. All other travel and related expenses for attending the conference or meeting should be borne by Amgen pursuant to Amgen's Travel Policy.

Other Employment or Business Activities

Amgen staff members may not engage in any employment or business activity, including serving on the board of directors of any for-profit company, without the express written consent of the Senior Vice President of Human Resources. Amgen staff and other Covered Persons may serve on boards of not-for-profit organizations, as a community service, subject to the provisions of this Policy.

- Further, if a Covered Person serves as a board member for a for-profit or not-for-profit organization, performs administrative or management duties, or has some other significant affiliation with that organization, he/she should not:

- Be involved in decisions related to the donation of Amgen money to that organization; or
- Be involved in decisions regarding medical education or other types of education provided to that organization.
- The above prohibitions do not apply to non-profit entities such as The Amgen Foundation, Inc., Safety Net Foundation, Inc. and ENcourage Foundation, Inc., which are directly sponsored or controlled by Amgen.

3. Additional Information

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. See Section 4, below, for a non-exhaustive list of governance documents related to this Policy. 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) the laws, regulations, and Amgen governance documents applicable to the activities they manage or supervise, (2) provide that their direct reports have appropriate training on compliance issues 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 the 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.