

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

It is Amgen’s policy to comply with all applicable export and import control laws and regulations. This Policy sets forth the requirements for proper export and import activities, including export and import of goods, software, or technology.

Export Control Laws

It is important to ensure that Amgen’s global supply chain is not interrupted. In the United States (“U.S.”), there are laws that govern, and in many cases restrict, the final destination of the sale and/or shipment of goods, software, and technology to ensure that certain individuals, businesses, or entities, including individuals and organizations associated with known terrorist activities, do not receive items made by or from a U.S. company. The U.S. Bureau of Industry and Security is responsible for managing the flow and sale of U.S. software, goods, and technology from the U.S. Violations of export control laws can result in civil and criminal penalties for Amgen and Covered Persons as well as suspension or denial of export privileges and debarment from U.S. Government procurements. Countries other than the U.S. may also have export control restrictions, and Covered Persons are required to follow all applicable laws related to exports.

Import Control Laws

Most countries regulate the flow of goods, technology and persons into their borders. In the U.S., for example, Customs and Border Protection (“CBP”), a division of the U.S. Department of Homeland Security, secures and facilitates trade and travel into the U.S. Many of the regulations enforced by CBP are intended to prevent acts of terrorism and to assure that goods entering the country are legitimate and that appropriate duties and fees are paid. Wherever Amgen operates, Covered Persons are required to follow all applicable laws related to imports.

General Guidelines for Compliance with Export and Import Laws

Outside of the U.S., Covered Persons must consult the Corporate Transportation Department or Law Department for guidance on export and import compliance.

In the U.S., it is Amgen’s policy that:

- Covered Persons must comply with export and import controls requirements when engaged in any of the following activities (which is a non-exhaustive list):
 - Creation of international shipping documentation such as a Customs/Commercial invoice or FedEx/UPS package label;
 - International shipment of goods, whether to third parties or between Amgen locations;
 - Shipment or movement of goods outside of the U.S. that are made in the U.S., made from components that originate in the U.S., or use U.S. technology in their construction;

- Transfer of goods or technology outside of the U.S. either verbally, in written form, or hand carried across borders. This includes training of specific methods and/or technologies and blueprints;
- “Deemed exports” and “deemed re-exports” of controlled technology to foreign nationals of certain countries specified by the U.S.
 - “Deemed exports” occur when technology is released within the U.S. to foreign nationals, and “deemed re-exports” occur when technology is released to foreign nationals who are located outside the U.S. For purposes of this Policy, technology is “released” when it is exchanged verbally, in written or electronic format, or made available for visual inspection or through practice or application by persons with knowledge of the technology.
- Covered Persons are required to follow all procedures that Amgen’s Corporate Transportation Department has established to ensure export and import compliance, which include:
 - Providing accurate and complete information on imported goods where such information is required
 - Valuing goods in alignment with applicable regulations
 - Marking goods with the appropriate country of origin where required to provide such information
 - Maintaining shipping documents in accordance with the regulations
- Covered Persons should contact the Amgen Corporate Transportation Department or Amgen Law Department if they have any questions about international transfer of goods, software, or technology.

Basic Shipping Procedures

Because of the complexity of export and import control laws, Amgen’s Corporate Transportation Department has established procedures to help ensure that shipping and other export/import activities are performed in a compliant manner. Covered Persons are required to follow these procedures. Covered Persons are responsible for determining which procedure applies to a particular shipment or commodity.

- One such procedure is that all international export activity must be shipped via an approved shipping location (posted on the Operations Supply Chain web portal) for final processing.

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.