

### 1. Scope

This Policy is part of Amgen's Personal Data Security Program and is 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

Amgen collects, uses and discloses various types of personal information about patients, healthcare providers, clinical trial participants, customers, Covered Persons, and others for a variety of lawful business purposes. The lawful collection and use of such information is important to Amgen's business activities. U.S. federal and state laws and the laws of other countries require companies to implement certain safeguards to protect personal information, i.e., regulate the collection, use, and disclosure of personal information. Unlawful use or disclosure of this information could adversely affect patients, healthcare providers, clinical trial participants, customers, Covered Persons, and others, as well as potentially expose Amgen to legal and regulatory risks. Amgen is committed to the lawful stewardship of personal information that is collected, stored and used by Amgen.

In light of the expanding number and variety of privacy and data protection laws around the world, Amgen's policy addresses compliance with all such applicable laws and regulations that protect Personal Information (defined below). This Policy covers the proper collection, handling and protection of Personal Information. Amgen shall implement Standard Operating Procedures, guidance documents, and protocols to support adherence to this Policy.

It is important to note that this Policy does not create specific privacy rights for any individual. Nothing herein is intended to nor shall modify or supersede any other Amgen policy to which Covered Persons (defined above) are subject, including but not limited to Amgen's *Use of Company Systems Policy*. As set forth in *Amgen's Use of Company Systems Policy*, Covered Persons do not have, and should not expect, any right to confidentiality or privacy when using Amgen Systems (as defined in *Amgen's Use of Company Systems Policy*).

#### Definition of Personal Information

Definitions for Personal Information may vary by region, business unit or data type depending on legal, regulatory and policy requirements, but "Personal Information" in some jurisdictions means information relating to an individual whose identity is apparent, or can be ascertained, from the information, by direct or indirect means. Examples of Personal Information may include the following, depending on the location where the individual or data subject resides:

- An individual's name, address, Social Security Number, driver's license number, financial account information, family information, or medical data;
- The name, professional education, and prescribing practices of a physician;
- The email address and other identifying information provided by someone visiting an Amgen website.

The above list is exemplary only and not exhaustive. Some types of Personal Information, such as personal health or financial information, may be entitled to special protections and safeguards under U.S. federal and state laws and regulations and the laws and regulations of other countries.

### General Guidelines for Protecting Personal Information

Amgen functions and business units that are engaged in the collection, handling and use of Personal Information are responsible for:

- Collecting, processing, using and transferring Personal Information in accordance with laws and regulations applicable in the relevant jurisdictions;
- Complying with specific protocols or agreements Amgen may undertake with respect to the handling of Personal Information (e.g., commitments made in clinical trial patient informed consent forms or in an Amgen Web site's privacy notice);
- Implementing appropriate security measures to protect Personal Information against unauthorized or improper access, destruction, alteration, storage or use; and
- Taking the necessary steps to respond to any incident involving a potential breach in the security of Personal Information.

Covered Persons must handle Personal Information in a manner that complies with all other enterprise-wide and functional governance documents relating to this Policy. Those governance documents may vary depending on the location of the affected functions, business units and Covered Persons, and the nature of the Personal Information involved. For example, the standards and procedures for handling Personal Information in the United States may be different from the standards and procedures for handling Personal Information in the EU and the definition of Personal Information itself may differ in those standards and procedures.

Covered Persons must reasonably safeguard Personal Information from unauthorized use, access, modification, destruction, or disclosure, and must destroy or make unreadable any computer files, documents, or other media containing Personal Information before disposal or removal, when those computer files, documents or other media are no longer needed for any business or legal purpose.

Non-employees acting on behalf of Amgen may have their services terminated for violating this Policy.

Nothing in this Policy limits Amgen's efforts to monitor compliance with other Amgen governance documents, or limits Amgen's lawful obligations to disclose Personal Information.

## 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.