

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

A culture of corporate compliance is best achieved in an environment that promotes open communication, including open and candid discussion of concerns about compliance with applicable laws, regulations and Amgen policy. All managers are responsible for creating and maintaining a work environment that encourages asking questions about legal and regulatory compliance and the reporting of concerns regarding business conduct.

It is Amgen’s policy to provide an effective process for Covered Persons to express concerns or report potential violations regarding Amgen business conduct (including potential misconduct by other Covered Persons) without retaliation or intimidation, in accordance with applicable laws and regulations, and to encourage the reporting of any such concerns. This Policy sets forth information and resources for Covered Persons to ask questions and report concerns regarding legal and regulatory compliance.

Asking Questions About Compliance Requirements

Covered Persons are encouraged to ask questions about Amgen’s compliance policies, procedures and practices and are expected to do so (i.e., ask questions) if they are unsure as to whether an action, activity or decision is consistent with law, regulation, or Amgen policy. To ask compliance questions, Covered Persons should consult (in no particular order):

- **Manager:** In most instances, Covered Persons who have questions about Amgen’s compliance policies, procedures, or practices should consult their immediate manager. Doing so should help to resolve issues in the most timely and efficient manner.
- **HR Business Partner:** Human Resources Business Partners can answer many questions, including questions about Amgen’s employment, personnel, and general business conduct policies and procedures.
- **Ombudsperson:** Amgen has established an Ombudsperson to provide Covered Persons with additional opportunities to ask questions.
- **Law Department:** Members of the Law Department are available to answer questions relating to legal and regulatory matters.
- **Compliance Council Members:** Each functional unit has at least one representative who sits on the Compliance Council and who is knowledgeable about compliance policies and procedures for the function’s activities. Contact information for Compliance Council members can be found [here](#).
- **Business Conduct Hotline:** Covered Persons may ask questions via the Amgen Business Conduct Hotline. Refer to Section 3 below for additional details.

Reporting Possible Compliance Violations

Covered Persons can call the Business Conduct Hotline at any time of the day or night to report possible violations of the Code of Conduct, an Amgen policy or applicable law.

- Calls to the Business Conduct Hotline can be anonymous, except where limited by law. Local laws in some countries discourage or prohibit anonymous reporting. In addition, some countries restrict the scope of what may be reported via a hotline such as only reporting accounting and financial irregularities.
- When Covered Persons call the Business Conduct Hotline, they will be asked to provide details of the incident or issue being reported. In order to thoroughly investigate a report, Amgen may find it necessary to ask the person making the report to disclose his or her identity in order to facilitate follow-up questions, and to authorize the disclosure of his/her identity (or information that could result in his/her identification). If the reporting person decides not to provide such information, Amgen may not be able to investigate the matter fully and/or take remedial action.
- All reports made through the Business Conduct Hotline will be considered seriously, including whether investigation or remedial action is necessary.
- Amgen staff members may also report compliance violations to their HR Business Partner, the Ombudsperson, or Compliance Council Members.
- Consultants, contract workers, and temporary staff, while not Amgen staff members, also may be in a position to help Amgen identify and resolve potential compliance issues. Such persons are invited to call the Business Conduct Hotline.
- Covered Persons should also be familiar with other hotline numbers that may be appropriate for reporting specific matters (e.g., adverse event reporting).

Appropriate Matters for Reporting

Generally, appropriate matters for reporting include good-faith concerns regarding compliance issues or misconduct, such as:

- Violations of law or regulation (whether in the United States or elsewhere);
- Violations of Amgen policy and standards of business conduct;
- Violations of policies regarding financial disclosures, accounting, accounting controls or auditing matters; and
- Any other serious wrongdoing within Amgen, including but not limited to, conduct that is inconsistent with the Amgen Values.

Note that the laws in some countries restrict the scope of what may be reported via a hotline, such as only allowing reports of accounting or financial irregularities.

Prohibition Against Retaliation

In accordance with applicable laws and regulations, Amgen policy prohibits any form of retaliation or intimidation against Covered Persons for reporting a compliance concern in good faith or for good-faith participation in any investigation or other proceeding related to such a report, even if Amgen ultimately concludes that there was no violation. This includes reports made through the Business Conduct Hotline, or those made through any other appropriate means.

Amgen staff members who engage in retaliation or intimidation in violation of this Policy will be subject to disciplinary action, up to and including termination, to the extent permitted by local laws. Any person who retaliates against another person for reporting actual or potential violations of law or regulation also may be subject to criminal and civil liability under U.S. federal and state laws and the laws of other countries.

Cooperating in Investigations and Litigation

Covered Persons are required to cooperate with internal investigations undertaken by Amgen and with Amgen's defense or prosecution of litigation.

- In particular, among other things, Covered Persons are required to make themselves available to internal investigators immediately upon request, be fully forthcoming and truthful with investigators, and provide complete and accurate information (including tangible items such as documents, recordings, and the like).
- Covered Persons are also required to cooperate fully with Amgen and its outside counsel in defending or prosecuting litigation on behalf of Amgen by completely and truthfully responding to company requests for information and documents. If Covered Persons provide testimony in litigation matters, such testimony must be complete and truthful.

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.