

1. Scope

Applicable to all Amgen 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 compliance questions, particularly questions relating to legal and regulatory compliance.
- **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](#).
- **Chief Compliance Officer:** Covered Persons may ask questions via the Amgen Business Conduct Hotline. The Hotline can be reached from any worldwide location at (888) 376-5574 any time of the day or night.

Reporting Potential Compliance Violations

Covered Persons worldwide are responsible for reporting violations of law, regulation, or Amgen policy.

- Covered Persons **can contact the Business Conduct Hotline at (888) 376-5574 (worldwide, except France), at any time of the day or night.**
 - Calls to the Business Conduct Hotline can be anonymous, except where limited by law.
 - When Covered Persons call the Business Conduct Hotline, they will be asked to provide details of the incident or issue being reported. Covered Persons are not required to reveal their identity. However, in order to thoroughly investigate a complaint, 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 concerns or complaints made through the Business Conduct Hotline will be considered seriously, including whether investigation or remedial action is necessary.
 - Some jurisdictions have special rules for matters that can be reported through hotlines. For example, in France, you may call 0 800 90 0374 only to report potential irregularities relating to Amgen's financial information.
- Amgen staff members may also report compliance violations to their HR Business Partner, the Ombudsperson, Compliance Council Members, or the Chief Compliance Officer.
- Covered Persons should also be familiar with other hotline numbers that may be appropriate for reporting specific matters.
- 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 utilize the Business Conduct Hotline.

Appropriate Matters for Reporting

- 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.

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

Covered Persons are required to cooperate with internal investigations undertaken by Amgen.

- 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).

3. Additional Information

Covered Persons Responsibility for Compliance

Every Covered Person worldwide is required to follow (1) the Amgen Code of Conduct, (2) all applicable laws and regulations, 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) ensure 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 Amgen staff member has violated this Policy, applicable laws or regulations, or any governance documents, appropriate disciplinary measures will be taken, to the extent permitted by local laws. The following is a non-exhaustive list of possible disciplinary measures to which Amgen staff members may be subject (subject to local laws): oral or written warning; suspension; removal of job duties/responsibilities or demotion; reduction in compensation; and termination of employment.

Subject to local 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.