

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

The preparation, use, and dissemination of timely, accurate, and balanced scientific information about Amgen products and areas of therapeutic interest to Amgen is consistent with Amgen’s mission to serve patients. Communications by pharmaceutical and biotechnology manufacturers regarding the risks, benefits, safety, and efficacy of products are subject to regulation in every country in which Amgen operates.

Generally, regulatory agencies distinguish between promotional communications and the non-promotional exchange of scientific information (often referred to as “scientific exchange”).

It is Amgen’s policy that all scientific exchange (defined below) complies with applicable laws and regulations in all countries where it conducts business. This Policy sets forth the principles regarding scientific exchange.

Definitions

For purposes of this Policy, “scientific exchange” refers to the *bona fide* exchange of medical and scientific information or data by Covered Persons (1) through scientific dialogue that is conducted in a non-promotional context (e.g., including, but not limited to, publications, medical education, disease state discussions), or (2) in response to an unsolicited question or request for information from a healthcare professional. Scientific exchange specifically excludes the communication of promotional information.

For purposes of this Policy, “promotional information” refers to any information or material prepared, used, or disseminated by Covered Persons (or agents of Amgen) involving an express or implied claim about the use, effectiveness, or safety of an Amgen product that is intended to promote the prescription or use of such product.

General Principles

Amgen is committed to scientific exchange that is:

- not promotional in its nature and intent, and
- truthful and non-misleading.

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.