1.0 Scope

This Policy applies to all staff members, consultants, external workers, secondees, and temporary staff worldwide of Amgen Inc. and subsidiaries and affiliated companies. Consultants, external workers, secondees, and temporary staff are not Amgen employees, and nothing in this Policy should be construed to the contrary.

2.0 Purpose

Information that you create, use, or receive as part of your employment or other work for Amgen (defined here as "Amgen Proprietary Information") is Amgen's property and must be protected. Unauthorized collection, use, or disclosure of Amgen Proprietary Information may expose Amgen to financial damage and reputational harm.

Each country in which Amgen does business has laws, regulations, and industry standards that govern the use and disclosure of Amgen Proprietary Information, as well as the maintenance of recorded information that evidences Amgen's operations (defined here as "Amgen Records"). Failure to comply with those applicable laws and regulations can expose both you and Amgen to serious legal consequences, including civil fines, penalties, and criminal prosecution.

This Policy informs you of your obligations regarding Amgen Proprietary Information and Amgen Records so that you can help protect Amgen's rights in Amgen Proprietary Information and make sure that Amgen complies with all laws and regulations concerning Amgen Proprietary Information and Amgen Records.

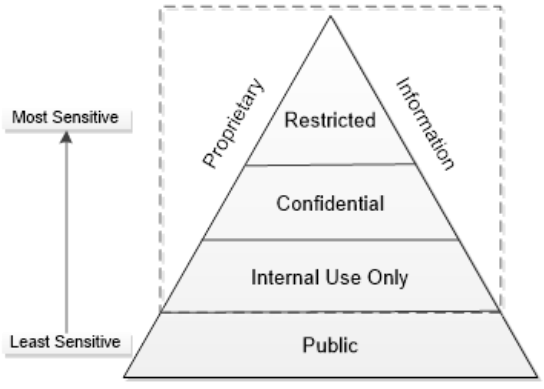
3.0 Classification of Amgen Proprietary Information

3.1. Classification by Sensitivity of the Information

For this Policy, information is classified as follows:

- Restricted
- Confidential
- Internal Use Only
- Public

Amgen Proprietary Information encompasses all information classified as Restricted, Confidential, or Internal Use Only. The diagram below illustrates the relationship of Amgen Proprietary Information to the information classification listed above.



Any information that is comingled or combined with information from a more sensitive classification must be classified at the higher sensitivity classification. For example, an electronic file that contains both Internal Use Only and Confidential information is classified as Confidential. Restricted, Confidential, and Internal Use Only information is further defined in sections 3.2, 3.3, and 3.4 below. Recorded information that should be considered an Amgen Record is classified as Restricted, Confidential, or Internal Use Only according to the Record Retention Schedule. Amgen Records and the Records Retention Schedule are described in Section 4.0 of this Policy. Failure to appropriately label information does not change the actual classification of the information.

3.2. Restricted Information

Information classified as Restricted could have a moderate to severe impact on Amgen's financial position or reputation. Restricted information is the most sensitive type of information within Amgen and is subject to the highest level of confidentiality. Restricted information is not normally disclosed under any circumstances. You may disclose Restricted information only to a carefully limited number of Need-to-Know Recipients (as defined herein) and only with the written approval of at least one of the following:

- General Counsel
- Chief Executive Officer
- Chief Compliance Officer
- A Senior Vice President

3.3. Confidential Information

Information classified as Confidential is information that should not be shared outside of Amgen to the general public and could harm Amgen's business if disclosed outside of Amgen. Confidential information is intentionally disclosed outside of Amgen only when there is a legitimate business need for such disclosure, and only in accordance with the appropriate disclosure approvals and procedures such as under an agreement with confidentiality obligations, through Final Publication Review (FPR) or other applicable Amgen process, or where you are authorized as part of your responsibilities on behalf of Amgen (e.g., lobbying or advocacy activities). Also, if an agreement requires Amgen to keep a third party's information Confidential, Amgen must comply.

3.4. Internal Use Only Information

Information used at Amgen can be valuable and proprietary even if it is not as sensitive as Restricted information and even if it does not satisfy the definition of "Confidential." Internal Use Only information may include information either generated within Amgen or generated by a third party and used internally at Amgen. Information in this category is developed and/or used at Amgen with the expectation that it will not be disclosed outside of Amgen without a legitimate business need for such disclosure, and only in accordance with the appropriate disclosure approvals and procedures such as under an agreement with confidentiality obligations, through Final Publication Review (FPR) or other applicable Amgen process, or where you are authorized as part of your responsibilities on behalf of Amgen (e.g., lobbying or advocacy activities). For example, records related to information prepared by Amgen to inform patients, health care providers, and payers about Amgen products may be classified as Internal Use Only. Other examples that may be classified as Internal Use Only include records related to internal Amgen communications, and records related to corporate advertising that are not product related. In general, information arising from or used in research and development functions should not be classified as Internal Use Only, but rather a higher-level classification.

3.5. Public Information

Information classified as Public includes public records or information available to the general public, as well as information that has been explicitly approved for a specific public disclosure under Section 5.3 including, but not limited to: by Law, Global Commercial Operations, or Corporate Affairs functions.

3.6. Information Designated as Attorney-Client Privilege or Work Product

Information protected by the attorney-client privilege or work product doctrine should be classified as either Confidential or Restricted, with Restricted reserved for situations where the underlying subject matter requires the higher-level classification. You should additionally label such information as “attorney-client privileged” or “work product” within the document or file. Categorizing a document as “legal” is unrelated to whether the document is privileged and thus does not imply that it is subject to any privilege. Questions concerning the proper use of attorney-client privilege or work product doctrine should be directed to the Law Department.

3.7. Classification and Labeling of an External Party’s Information

Amgen may be obligated by contract or regulatory requirement to classify and label external party information. You should confirm with the Law Department whether such classification and labeling obligations exist and comply with them.

4.0 Records and Information Management

4.1. Creating Records

Your work requires you to create and receive information that is recorded in one or more forms, whether on paper, electronic documents, or other media. You must create records that are clear, accurate, true, and complete. The Records Retention Schedule specifies the information classification (Restricted, Confidential, Internal Use Only, or Public) that should be applied to different categories of Amgen Records.

Recorded information that evidences Amgen’s operations is considered an Amgen Record. Information becomes an Amgen Record if it is recorded on paper or in electronic or any other media. Unless otherwise provided by applicable law, Amgen Records are owned by Amgen alone without regard to the effort that you or others contributed in creating the Amgen Records or their underlying Amgen Proprietary Information.

4.2. Storage, Use, and Maintenance of Records

Amgen functions are responsible for maintaining effective Records and Information Management (RIM) processes in alignment with applicable laws, regulations, and Amgen policies that support the efficient location, retrieval, production, retention, and deletion or destruction of records. You are responsible for ensuring that Amgen Records are captured in a repository defined by the associated Amgen function. Upon exit from Amgen, you must comply with the Human Resources (HR) and information security processes for returning to Amgen, all Amgen Records in your possession.

Each Amgen function is responsible for identifying Amgen Records of which it has ownership, ensuring that such Amgen Records are adequately protected from accidental or willful loss or damage, and ensuring that they are available and accessible after a disaster or system failure. Amgen functions are further responsible for receiving, indexing, and protecting records and information, applying governance policies and procedures, and making the information available to key stakeholders.

4.3. Hold Order

A "Hold Order" is a written order or directive instructing employees to suspend the deletion or destruction of certain records and information until further notice. Information subject to a Hold Order may be relevant to the facts at issue in a pending or anticipated judicial proceeding, audit, government investigation, or government inquiry. You should maintain all records subject to a Hold Order as provided in this Policy and only delete or destroy such records if permitted by the terms of the Hold Order.

Once a Hold Order is issued, you should place on hold deletion or destruction of information subject to the Hold Order until the Hold Order is explicitly revoked. There are serious consequences for Amgen and for anyone who deletes or destroys records and information while a Hold Order is in effect.

4.4. Deletion or Destruction of Records

Files, documents, and information must be regularly reviewed to determine if they constitute Amgen Records. Recorded media that contain only information that does not evidence or contribute to evidencing an Amgen process, activity, or action is not an Amgen Record. Unless such a non-record is subject to an active Hold Order, it should be destroyed or deleted once its business value has ended.

Amgen's Record Retention Schedule defines the length of time that records must be retained according to operational, fiscal, regulatory, and legal requirements. Retention requirements apply independently from the media on which an Amgen Record is held. Amgen Records must be retained for the period of time that is stipulated in Amgen's Record Retention Schedule, unless subject to an active Hold Order. Once an Amgen Record's retention period has expired, the record should be deleted or destroyed, unless subject to an active Hold Order. Deletion or destruction of records must be completed in a secure manner, protecting all Amgen Proprietary Information from disclosure.

5.0 Disclosure of Proprietary Information

5.1. Disclosure within Amgen

Regardless of its classification, you may only disclose Amgen Proprietary Information to Need-to-Know Recipients. "Need-to-Know Recipients" are Amgen staff members, consultants, external workers, secondees, and temporary staff who have a legitimate and demonstrable business need to receive the information for use in connection with their defined roles or job functions.

More sensitive information will have a more limited set of Need-to-Know Recipients than less sensitive information. For information classified as Restricted, there may be only one or very few Need-to-Know Recipients. You should ensure that only Need-to-Know Recipients are included in any information-sharing methods, including email lists, SharePoint, Box, Teams, and other collaboration tools.

5.2. External Disclosure Under Contract

You can disclose Amgen Proprietary Information to individuals and companies external to Amgen when such external recipients have a need to know in connection with an Amgen business purpose and are compelled to keep the information confidential. Due to the recipients' confidentiality obligations, the Amgen Proprietary Information will remain Amgen Proprietary Information even after the disclosure.

Before making such a disclosure, you must first either (1) make sure the external recipient is already obligated to confidentiality by law or professional code, or (2) obtain a written agreement between Amgen and the external recipient that incorporates confidentiality obligations and the external recipient has

completed a Third-Party Risk Assessment (TPRA), when required. Such agreements include, but are not limited to, Confidential Disclosure Agreements (CDAs, also known as Non-Disclosure Agreements or NDAs), as well as consulting agreements, clinical trial agreements, and research agreements.

You may disclose Amgen Proprietary Information without such agreements if such disclosure is permitted or required by law (see Section 6.0).

5.3. Public Disclosure

Disclosure of Amgen Proprietary Information to individuals or audiences who are not bound by confidentiality obligations (Public Disclosures) must first be reviewed and approved through Final Publications Review (FPR) unless another Amgen review process applies to the material, such as the Scientific Material Review Process (SMRP), Material Approval and Compliance (MAC), e-Approve, or their regional or country equivalents.

Examples include, but are not limited to:

- Manuscripts, such as research papers and review articles;
- Abstracts, posters, presentations, thesis submissions, and slide decks;
- Speeches;
- Website postings;
- A job search disclosure or disclosure to a future employer; and
- Press releases.

A subset of Public Disclosures are “Publications”—that is, manuscripts and articles in peer-reviewed scientific journals and abstracts and presentations in the form of posters or slide decks made at scientific congresses/conferences and the like. Publications are subject to additional requirements before being publicly disclosed. Refer to Amgen’s procedures for Publications for further information.

6.0 Applicable Laws

6.1. Compliance of this Policy with Laws and Contractual Obligations

This Policy is intended to comply with applicable laws and contractual obligations regarding disclosure of information and should be interpreted to be consistent with such laws and contractual obligations, including any Proprietary Information and Inventions Agreement (PIIA) with Amgen that you have signed. You should consult the Law Department for any questions regarding laws governing disclosure of Amgen Proprietary Information.

6.2. Disclosure Permitted by Law

You may disclose Amgen Proprietary Information to relevant governmental authorities (e.g., the Food and Drug Administration (FDA), European Medicines Agency (EMA)) or those acting on their behalf if required by law in connection with your duties for Amgen.

This Policy does not prohibit you from discussing wages, benefits, and other terms and conditions of employment as protected under the U.S. National Labor Relations Act, other applicable U.S. state or federal law, or applicable laws of any other country.

This Policy also does not prohibit you from reporting possible violations of any law or regulation to any governmental agency or from making other disclosures that are protected under applicable law or regulation. Except for communications subject to attorney-client privilege, you do not need authorization from Amgen

to make any such reports or disclosures and are not required to notify Amgen that you have made such reports or disclosures. You may not reveal the content of a privileged communication under any circumstances without the express, written authorization of the Law Department.

You will not be held criminally or civilly liable under any U.S. federal or state trade secret law (including, without limitation, the U.S. Defend Trade Secrets Act) for the disclosure of a trade secret that is made (1) in confidence to a U.S. federal, state, or local government official, either directly or indirectly, or to an attorney, solely for the purpose of reporting or investigating a suspected violation of law; or (2) in a complaint or other document filed in a lawsuit or other proceeding if such filing is made under seal. If you work outside the U.S., you may have similar immunity under laws in other jurisdictions, and this Policy should be interpreted to be consistent with such laws. Where legally possible in any jurisdiction, disclosures in a lawsuit should be made under seal or through another procedure for preserving confidentiality.

If you file a U.S. lawsuit for retaliation by Amgen for reporting a suspected violation of law, you may disclose the trade secret to your attorney and use the trade secret information in the court proceeding if you (1) file any document containing the trade secret under seal, and (2) do not disclose the trade secret (other than to your attorney), except pursuant to court order. Jurisdictions outside the U.S. may confer similar rights regarding lawsuits for retaliation, and this Policy should be interpreted as consistent with such laws.

6.3. Responding to Requests from Law Enforcement, Subpoenas, Court Orders, and the Like

If you receive a request, subpoena, or court order requiring you to testify or provide Amgen Proprietary Information, in whole or in part, to the general public or to any third party other than government entities, you must immediately notify the Law Department and immediately provide the Law Department representative with all documents and other pertinent information in your possession or control to permit Amgen to take such steps as it deems necessary in its sole discretion to block, or pursue the confidentiality of, such disclosure. To the extent legally permissible, you shall not testify or provide Amgen Proprietary Information, in whole or in part, to any third party (excluding government entities) if Amgen has informed you of its intent to contest the validity or enforceability of any request, subpoena, or court order until such time as Amgen has informed you in writing that it consents to your testimony or has fully exhausted its efforts to challenge any such request, subpoena, or court order.

7.0 Submitting Questions, Reporting Concerns, or Disclosing Conflicts

7.1. Resources for Amgen Staff

The following is a list of resources that may be used to ask questions about how to comply with an Amgen Policy, to report a concern, or to disclose a potential conflict of interest[1]. If you are aware of a situation that you believe may be a violation of an Amgen Policy or that may be otherwise unlawful or unethical, you must report it through one of the resources listed below.

- Contact the Business Conduct Hotline (BCH) 24 hours per day, 365 days of the year. Reports can be made in any language and anonymous reporting is permitted, except where limited by local law. Please check the BCH website for country-specific restrictions and limitations. You can submit questions or report concerns via a secure webform by visiting the BCH website at https://amgenbch.ethicspoint.com. In the U.S., Canada, and Puerto Rico, you also may call (888) 376-5574 to be connected to an interview specialist. Outside of those locations, please access the

[1] For Insider Trading questions or concerns, contact the Corporate Law Hotline at (805) 447-1222.

BCH website to obtain the appropriate country contact number.

- Contact your Manager, regional/local Compliance Representative, or Human Resources (HR) partner. To contact HR, email HR Connect at HRCONNECT@amgen.com or call the following:
    - For U.S., Canada, LATAM, call (805) 447-1111
    - For Puerto Rico, call (787) 916-1111
    - For Europe, Middle East & Africa, call +31 76 578 6500
    - For JAPAC, call +612 9870 1990
- Contact the Law Department:
  Call (805) 447-3360 to leave a voicemail with Law Operations or contact via email at law.operations@amgen.com.
- Contact the company's Ombudsperson:
  For North America, call (805) 447-8200 to leave a voicemail.
  Outside North America, call +1 (866) 511-6787 to leave a voicemail.