



AMGEN

SERVING PATIENTS WITH INTEGRITY:
Amgen's Global Code of Conduct



A Message From Our CEO

In 1996, Amgen established a set of core values—focused on science, ethics, teamwork, and collaboration—to guide our growing company. Over 30 years later, these values remain just as essential. They continue to serve as our foundation as we navigate a fast-changing world, helping us stay true to our mission: to serve patients.

Today, as we serve patients in more than 100 countries and plan for the next decade of innovation, these values are more than a reflection of who we are—they are a blueprint for how we lead. Together with our mission, aspiration, strategy, and leadership attributes, they form the foundation of our social architecture and define our culture at Amgen.

Our Code of Conduct brings this blueprint to life. It's a resource to help each of us make ethical decisions and speak up when something doesn't seem right. Your voice matters. Raising a concern in good faith is not only encouraged—it's required. And you can do so knowing you'll be supported at every step. That's how we protect each other, uphold the law, and live our values. As we chart the course for our future, our shared values will continue to guide us.

You cannot lead in human health and biotechnology unless you lead with ethics, transparency, and a deep commitment to doing what's right.

Thank you for your continued dedication to living these values every day.

Robert A. Bradway

Chairman and Chief Executive Officer
Amgen Inc.

“You cannot lead in human health and biotechnology unless you **lead with ethics, transparency, and a deep commitment to doing what's right.**”

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Our Values and Leadership Attributes Guide Amgen's Code of Conduct

Amgen's Values and Leadership Attributes establish important context for staff and manager behaviors. All eight Values and four Leadership Attributes are provided here for reference.

Our Values

Be Science-Based

Our success depends on superior scientific innovation, integrity, and continuous improvement in all aspects of our business through the application of the scientific method. We see the scientific method as a multi-step process that includes designing the right experiment, collecting and analyzing data, and engaging in rational decision-making. It is not subjective or emotional, but rather a logical, open, and rational process. Applying the scientific method in all parts of the organization is expected and highly valued.

Compete Intensely and Win

We compete against time, past performance, and industry rivals to rapidly achieve high quality results. Winning requires taking risks. We cannot be lulled into complacency by previous achievements. Though we compete intensely, we maintain high ethical standards and demand integrity in our dealings with competitors, customers, partners, and each other.

Create Value for Patients, Staff, and Stockholders

We provide value by focusing on the needs of patients. Amgen creates a work environment that provides opportunities for staff members to reach their full potential. We strive to provide stockholders with superior long-term returns while balancing the needs of patients, staff, and stockholders.

Be Ethical

We are relentless in applying the highest ethical standards to our products, services, and communications.

Trust and Respect Each Other

Every job at Amgen is important and every Amgen staff member is important. We attract diverse, capable, and committed people and provide an environment that both fosters inclusion, respect, and individual responsibility and values diversity. Trust is strengthened through personal initiative and by obtaining quality results rapidly.



Operating With Integrity

At Amgen, integrity isn't just a policy. It's who we are.

Our culture is built on trust, accountability, and doing what's right, even when it's difficult. This shared commitment to integrity shapes how we work together, how we make decisions, and ultimately how we serve patients.

That culture is grounded in what we call our Social Architecture, the framework that brings clarity and alignment to everything we do. It begins with our **Mission** to serve patients, our North Star. It's guided by our **Aspiration** to be the world's best human therapeutics company. Our **Strategy** defines the choices we make to fulfill that Mission and Aspiration. And our **Values and Leadership Attributes** describe the behaviors that bring these commitments to life every day.

Our **Code of Conduct** connects these elements. It turns our values into action and provides the practical guidance we need to navigate an increasingly complex world. It reminds us that integrity is more than what we do; it's how we live our commitment to protect patients, ensure quality, treat others with respect, act ethically in business relationships, and speak up when something does not feel right. It is woven into the fabric of how we operate every day.

Together, we're ensuring that Amgen continues to be a company that patients, partners, and colleagues can always trust.

Nancy A. Grygiel, Senior Vice President and Chief Compliance Officer

Amgen's Social Architecture



Our Values (continued)

Ensure Quality

Quality is a cornerstone of all of our activities. We seek the highest quality information, decisions, and people. We produce high quality products and services. Quality is woven into the fabric of everything we do.

Work In Teams

Our teams work quickly to both move scientific breakthroughs from the lab through the clinic to the marketplace and to support other aspects of our business. Diverse teams working together generate the best decisions for patients, staff, and stockholders. Our team structure provides opportunities for Amgen staff to impact the direction of the organization, to gain broader perspective about other functions within Amgen, and to reach their full potential.

Collaborate, Communicate, and Be Accountable

Leaders at Amgen seek input and involve key stakeholders in important decisions. In gathering input, strong leaders will welcome diverse opinions, conflicting views, and open dialogue for serious consideration. They will clearly communicate decisions and rationale openly and in a timely manner. Once a decision is made, the leader and members of the team will all be accountable for the results and for implementing the decision rapidly.

Amgen San Francisco

Our Leadership Attributes

INSPIRE

Create a connected, inclusive, and inspiring work environment that empowers talent to thrive.

ACCELERATE

Enable speed that matches the urgency of patient needs by encouraging progress over perfection.

INTEGRATE

Connect the dots to amplify the collective power of Amgen to drive results for patients, staff, and shareholders.

ADAPT

Lead through change by adapting to an ever-changing environment and defining a clear course of action to deliver results.





ACTING WITH INTEGRITY

Why It Matters: Integrity guides how we make decisions, especially when the right choice isn't the easiest one. At Amgen, acting with integrity means following the law, complying with our Code of Conduct and policies, and taking responsibility for our actions. We raise concerns, ask questions when unsure, and do what's right every time. This protects patients, earns trust, and safeguards Amgen's reputation.



Acting With Integrity

At Amgen, our Mission and Aspiration (why), Strategy (what), and Values and Leadership Attributes (how) guide how we treat each other, care for patients, grow our business, and make a positive impact. Integrity is at the heart of it all.

Serving patients is a privilege. We earn their trust by acting with honesty, accountability, and respect—every day, in every decision. Doing the right thing is expected. We follow our Code of Conduct and the policies that apply to our work. We treat everyone with respect—patients, coworkers, members of the healthcare community, government officials, and business partners. We speak up when something doesn't seem right, ask for help when needed, follow the law, speak the truth, and cooperate fully when required.

We engage in compliance education throughout the year. Ongoing training helps keep our shared principles and culture strong and present in how we work. It is important that all staff complete required compliance training to understand the laws, policies, and standards that guide our work.

Staff members who fail to comply with the Code of Conduct, Amgen policies, or applicable laws will be subject to disciplinary action up to and including termination of employment, to the extent permitted by local laws. Managers who ignore misconduct or fail to correct it may also face disciplinary action. Amgen may also terminate the services or work engagement of non-employees who fail to comply with our Code of Conduct, our policies, and applicable law.

VALUES IN ACTION:

I asked one of my team members to send a sensitive file to an outside vendor for a high-profile project. The team member raised a concern back to me, asking whether we had a nondisclosure agreement in place. I thanked the staff member for speaking up and demonstrating accountability. I then asked them to contact Global Strategic Sourcing to confirm whether an agreement was in place before proceeding.

By taking time to listen and respond appropriately, I demonstrated the importance of integrity and created a space where my team member felt empowered to flag a potential issue. This not only upheld Amgen's high ethical standards but also reinforced a culture where doing the right thing is expected and supported by leaders.



Laura and Pat meeting on campus, Amgen Thousand Oaks

VALUES IN ACTION:

After my coworker raised a concern about a project, some teammates started leaving her out of meetings and training. They disagreed with her perspective, even though she spoke up in good faith. That's retaliation. It's wrong and goes against our values.

I made sure she was included again and asked for her input. I also told my manager what was happening.

Manager Responsibilities

Managers demonstrate Amgen's Leadership Attributes through their everyday actions: Inspire, Accelerate, Integrate, and Adapt.

They lead by example, living our values and upholding high ethical standards in everything they do. Managers support others not only by following Amgen's policies themselves but also by ensuring that employees feel empowered to act with integrity and to do the right thing.

Managers make time for their people and create a safe space for employees to ask questions and raise concerns. Ignoring misconduct or failing to address it is against our values and policies.

Speaking Up

Asking questions and reporting concerns helps Amgen perform at its best. Everyone at Amgen should feel safe to speak up—without fear of retaliation.

If we see or suspect misconduct, we must report it.

Amgen does not tolerate retaliation against anyone for raising a concern in good faith. If we experience, suspect, see, or hear about retaliation, we report it right away.

What Is Retaliation?

Retaliation is mistreating someone or treating them differently for doing the right thing: speaking up, reporting misconduct, or raising a concern.

It can include (but is not limited to) being bullied, demoted, reassigned, left out of projects or communication chains, or threatened for speaking up.

At Amgen, retaliation is never tolerated. It undermines our culture of trust, respect, and integrity.

Business Conduct Hotline

At Amgen, our Business Conduct Hotline is available 24 hours a day, every day of the year. Most languages are supported, and reporting is possible by online **webform** or by phone. You can report concerns, ask questions, or request information at <https://amgenbch.ethicspoint.com>.

You can also report anonymously, if locally allowed.

The Hotline team collects and reviews all reports seriously and carefully, and treats them confidentially to the extent possible, to ensure that they are appropriately resolved.

Learn more by reviewing the **Business Conduct, Reporting, and Non-Retaliation Policy** or contact Worldwide Compliance & Business Ethics.

Making Ethical Decisions

We all play a role in protecting Amgen's culture, reputation, and brand. Our choices must align with company values, company policies, and the law.

Ask yourself:

- Does this follow the law?
- Is it consistent with Amgen's policies and values?
- Would I be comfortable if this appeared in the news?

If all answers are yes: Go ahead.

Your decision is probably right.

If any answer is no: Stop. Don't do it.

It could harm someone or the company.

If you're not sure: Wait and ask for help. Talk to your manager, Human Resources, Compliance, or the **Business Conduct Hotline**.

VALUES IN ACTION:

While updating a presentation with new research on one of our products, a colleague suggested adding data from a recent study that seemed helpful, but they hadn't gone through the required review process.

We were on a tight timeline. It felt like a small addition, but I paused to consider. Does this follow our policies? Would I be comfortable if this slide appeared in the news?

I realized it wasn't worth the risk. I left out the data and explained why in my report. My manager agreed and thanked me for doing the right thing.

Sarah working at Operations and Manufacturing site, Amgen Ireland





WE DO WHAT'S RIGHT FOR OUR PEOPLE

Why It Matters: We treat each other with trust and respect, and we build teams where all voices are heard and valued. Our people are central to our mission to serve patients. We build a positive workplace where everyone can be themselves, grow, feel supported, and speak up without retaliation. We create safe spaces, welcome different views, and listen with an open mind.



Amgen Ohio

Respectful Treatment

We care about how we treat one another. Everyone at Amgen deserves to work in a place free from discrimination, harassment, and bullying. Every individual deserves equal opportunities to succeed based on their performance, contribution, and behavior.

At Amgen, we report mistreatment whenever we see or suspect it. Everyone should feel safe and respected at work.

What Is Discrimination?

Discrimination occurs when someone is treated unfairly based on a protected trait—such as race, age, religion, sexual orientation, or gender—rather than their performance. This includes decisions related to hiring, firing, promotions, and job assignments.

What Is Harassment?

Harassment is any unwelcome conduct based on a protected trait. It can be verbal, physical, or written. It includes offensive jokes, comments, or touching. Sexual harassment includes unwanted advances, inappropriate comments, or asking for sexual favors in exchange for benefits at work.

What Is Bullying?

Bullying is any abusive behavior meant to harm or control someone, such as threats, humiliation, or intimidation.

We believe that our differences lead to better science. We understand that in order to meet our mission, we must harness the collective power of our differences in service of patients. We stay curious, listen, and make space for others to share their ideas.

Learn more by reviewing the [EEO, Anti-Discrimination, and Anti-Harassment Policy](#) or contact Human Resources.

VALUES IN ACTION:

During a team meeting, I saw a team member repeatedly talk over a colleague. I slowed down the conversation to make sure our teammate had a chance to ask questions and share their thoughts. The team member picked up on this and also made more space for the conversation.

Open and respectful communication helps everyone feel included. It also improves how we work together and makes room for new ideas.

Health and Safety

The safety, health, and well-being of our people are essential to our success. Creating a safe workplace is a shared responsibility in which we all play a part. We engage in safety training, follow all health and safety procedures, and speak up when we see something concerning. Violence, threats, and drug or alcohol use have no place in our work environment.

If you notice unsafe conditions or behavior, including substance use or signs of distress, report it right away.

Support is always available. If a teammate is struggling, helping them access the right resources can protect their well-being and strengthen our safety culture.

Learn more by reviewing the [Environment, Health, and Safety Policy](#), [Business Conduct, Drug, Alcohol & Tobacco Policy](#), or contact Environmental Health & Safety.

VALUES IN ACTION:

I was visiting another Amgen site and decided to respond to a text while walking to a meeting. Because I wasn't watching where I was going, I tripped on a step and fell. I was embarrassed and late to the meeting.

Now, I stop walking when I need to read or reply to a message. I also remind coworkers not to walk and text. It's a small step that helps keep us all safe.

Brianna and Jeffrey working in the lab, Amgen Thousand Oaks





WE DO WHAT'S RIGHT FOR **PATIENTS**

Why It Matters: Patient health and safety are our top priorities in every decision we make. Patients depend on our innovative medicines and trust us to act with integrity; protecting that trust is essential to our mission. Each of us plays a vital role in supporting patients throughout their care journey. We start by asking what's best for the patient, provide clear and balanced information, and uphold rigorous scientific and quality standards. Above all, we respect the integrity of the healthcare provider-patient relationship.

A Message From a Patient

Dear Amgen Team,

I want to thank you for your commitment to patients and for your integrity. I see firsthand that you put patients first. I love that you bring patient stories to your research teams, providing the human side of the continuous need for newer and better treatments. Amgen's treatments and people have made a real difference in my life.

As a patient, I know how scary and uncertain things can feel. We need to put our trust in the people who care for us. For me, it's not just about getting medicine—it's about knowing that the company behind it truly cares. The way Amgen acts with honesty and high standards has helped build that trust.

The people who I've met from Amgen care deeply about their work and about helping patients. I personally have benefited not only from Amgen treatments but also from the patient support Amgen has provided me.

What you do truly matters. Your research brings hope to people who don't have many treatment options. Your efforts to educate and support patients help us to feel more in control of our health and of our lives.

Thank you for keeping true to your values. Your work means a lot to patients like me, and we trust you because of it.

With deep appreciation,
Vickie R.

“ For me, it's not just about getting medicine—**it's about knowing that the company behind it truly cares.** The way Amgen acts with **honesty** and **high standards** has helped build that **trust.** ”





The Patient Community

We provide healthcare professionals with clear and timely information about our products, ensuring that they and their patients understand both the benefits and the risks. We listen to patients and patient advocacy groups with respect, and we incorporate their feedback to improve our work. By collaborating with doctors, patient advocacy groups, insurers, and lawmakers, we support patients getting access to the medicines they need—while following all laws and ethical standards.

Members of the Healthcare Community

We never offer or give anything of value to get someone to buy or recommend our products. We pay fair market value for services and are transparent about what we spend. We follow all rules that apply to the way we work with others in healthcare.

What Do We Mean By Healthcare Community?

The Healthcare Community includes individuals and organizations involved in patient care, research, education, reimbursement, and healthcare decision-making. This includes healthcare professionals, institutions, researchers, payers, patient advocacy organizations, and government-affiliated entities that may influence access to or use of an Amgen product.

Learn more by reviewing the **Communications with Members of the Healthcare Community Policy** or contact Worldwide Compliance & Business Ethics.

VALUES IN ACTION:

A physician I work with asked me if I could hand out brochures about his practice and background to other healthcare professionals I know. I didn't want to damage the relationship, but I knew I couldn't promote his services. I explained that I'm not allowed to market for outside providers, even if I trust them. It was the right thing to do—and it helped keep our interaction professional and fair.



Conference booth, Amgen India

Promotion and Marketing

We promote our products honestly. Everything we say or share must be true, accurate, complete, and consistent with product labels and the law. Our marketing communications are based on efficacy, safety, quality, and value. This helps patients and healthcare professionals clearly understand the benefits and risks of our products.

Learn more by reviewing the **Anti-Bribery and Anti-Corruption ("ABAC") Policy** and contact Worldwide Compliance & Business Ethics.

Scientific Information

We uphold rigorous standards of scientific and ethical integrity in our research, development, and publications. We share accurate, timely, and balanced information with healthcare professionals, and we collaborate responsibly to support patient care—always in line with approved labeling and regulations.

Learn more by reviewing the **Communications with Members of the Healthcare Community Policy** or contact Worldwide Compliance & Business Ethics.

VALUES IN ACTION:

A teammate and I were working on a pitch for a potential customer. She suggested changing parts of our approved promotional materials to better fit the customer's specific needs. "It's a small tweak," she said.

I understood why she wanted to customize the message, but I also knew that even small changes could go against our policy. I reminded her that Amgen's materials go through a strict review process for a reason—and we can't just change them on our own.

At first, she was frustrated. But after we talked it through, she agreed to stick with the approved content and explore whether we could request updated materials through the right channels. It wasn't the easiest conversation, but it helped us do things the right way.





Privacy and Information Security

We protect personal information and use it only for the right reasons. We handle the personal information of patients, caregivers, clinical trial participants, healthcare professionals, colleagues, and partners with care, respect, and integrity.

We follow all applicable laws and Amgen's policies when handling personal information. **This means:**

- Giving appropriate notice.
- Obtaining consent when needed.
- Limiting use to approved purposes.
- Sharing or providing access only with those who need it and can appropriately protect it.

We use secure Amgen-approved technology systems to keep personal information safe from loss, misuse, or unauthorized access.

Protecting Privacy Is How We Earn and Keep Trust

Vendors and external partners must follow the same privacy, data-protection, and records-management standards that we adhere to—including when sharing, storing, or disposing of information.

If you have questions, contact **Amgen Privacy Compliance at privacy@amgen.com**. If you think data have been misused or lost, report it right away to the Business Conduct Hotline.

What Is Personal Information?

Personal information is any detail that can be used to identify someone. This includes names, phone numbers, addresses, or family details. Sensitive personal information includes health data, genetic information, and financial account details.

Learn more by reviewing the **Protection of Personal Information Policy** or contact Worldwide Compliance & Business Ethics.

VALUES IN ACTION:

In my role, I often handle customer information. I considered creating a separate file to make the data more accessible to my team. However, I paused to reflect on our privacy principles, which remind us to collect, use, and store only the minimum amount of personal information necessary—and only for the original purpose it was collected for.

I realized that making this extra file, while convenient, could lead to storing data longer than needed or using it outside its intended scope. To stay aligned with our commitment to protecting personal information, I decided not to create the file.



Staff member in Manufacturing Plant, Amgen Ohio

Product Quality

We work together to develop, manufacture, test, and distribute high-quality products while following all global regulations, internal standards, and SOPs (standard operating procedures aligned with Good Manufacturing and Good Distribution Practices). We protect the integrity of our data, use strong quality controls, and follow clear escalation and reporting processes to meet our quality standards and requirements.

We take accountability for our work, use science-based data and information to characterize our products, make sound decisions, manage risks, and always look for ways to improve. By simplifying processes and making informed decisions, we help ensure that our products meet the needs of patients globally.

Learn more by reviewing functional policies, such as the **Global Code of Ethics and Animal Care and Use Policy** or contact Quality.

Commitment to Product Safety

We protect patient safety across the world and help patients make informed choices about their care by promptly collecting data on, reviewing, and reporting any adverse events, product complaints, or other safety findings (collectively known as Reportable Events) that patients experience when taking our products. Everyone at Amgen, no matter their role, must report any Reportable Event they become aware of within one business day.

How and Where to Report

Everyone is trained on how to report these events. You can submit Reportable Events through the Amgen Safety Reporting Portal at <https://www.amgensafetyportal.com> (the preferred method) or by contacting corporate headquarters or your local Medical Information/Safety Office. In the United States, call 805-447-3505 or 800-772-6436 (800-77-AMGEN). Local contact details for other countries are available at **MyAmgen – Reporting Adverse Events and Product Complaints page**.

Learn more by reviewing the **Adverse Event and Product Complaint Reporting Policy** or contact Global Patient Safety.





WE DO WHAT'S RIGHT FOR OUR **BUSINESS**

Why It Matters: We run our business honestly and fairly. We use resources wisely, follow the law, protect company property, and build respectful relationships with partners, regulators, and competitors. Trust is the foundation of our success. Acting with integrity protects our reputation, helps us compete fairly, and supports responsible and sustainable growth. We follow company policies and the law, avoid conflicts of interest, protect private information, keep accurate records, and use new ideas responsibly. By working with respect and accountability, we protect our business and build long-term value.

Responsible Use of Artificial Intelligence (AI)

We use advanced technology—including AI—to improve how we discover, develop, and deliver medicines.

Our use of AI is guided by Amgen's commitment to Responsible AI—ethical, transparent, accountable practices that protect individual rights, support scientific integrity, and foster trust.

We design and apply AI systems thoughtfully, assessing their impact on people, health outcomes, and society. Through a cross-functional governance framework led by Amgen's Law, Compliance, Quality, Cybersecurity, and Technology teams, we ensure that AI is used responsibly across its entire lifecycle—from design and training through deployment and oversight.

By embedding Responsible AI into how we innovate, we uphold Amgen's integrity, advance science responsibly, and maintain the trust of patients, partners, and society.

Our Responsible AI approach includes:

- Identifying and minimizing risks of bias, misinformation, and unintended harm.
- Requiring human judgment for decisions that affect patient safety, scientific or regulatory outcomes, or employee wellbeing. AI may inform decisions, but it does not replace qualified human oversight.
- Embedding privacy-by-design, security-by-design, and Responsible AI principles to safeguard the integrity, confidentiality, and appropriate use of data.
- Adhering to evolving laws, regulations, and international frameworks such as the National Institutes of Standards and Technology (NIST) AI Risk Management.
- Establishing a framework and other emerging global standards. Monitoring AI performance after deployment to ensure that they continue to perform safely and appropriately, and quickly addressing issues such as inaccurate, biased, or potentially harmful outputs.

We also invest in AI literacy to help employees understand how to use AI appropriately, safely, and in alignment with Amgen's ethical and scientific standards. Employees must use approved AI tools responsibly, apply human judgment and appropriate oversight when AI is used to inform sensitive decisions, particularly those that have a meaningful impact on individuals, and promptly escalate concerns related to inaccurate, misleading, biased, or inappropriate outputs.

Learn more by reviewing the [Responsible Use of Artificial Intelligence Tools SOP](#) or contact Technology.



"Responsible AI is an expression of our Values and fundamental to who we are as a science-driven company. As AI becomes more integrated into how we discover, develop, and deliver medicines, the principles in our Code of Conduct provide the foundation for using these tools ethically, transparently, and with appropriate human oversight. This discipline protects patients, safeguards data, and enables us to innovate boldly in support of our mission."

Sean Bruich, Senior Vice President and Chief Technology Officer

Gifts and Entertainment

We do not give or accept gifts, entertainment, or favors from anyone doing—or hoping to do—business with us. We conduct business fairly and avoid anything that could be seen as improper, including exchanging gifts, entertainment, or special treatment. If someone offers us a gift or invitation that doesn't feel right, we find a respectful way to say no or return it.

Learn more by reviewing the [Gifts & Entertainment Policy](#), [ABAC Policy](#), and [Conflicts of Interest Policy](#) or contact Worldwide Compliance & Business Ethics.

VALUES IN ACTION:

At a conference, I had planned a modest business dinner with a potential supplier. When my schedule changed, I considered letting them go ahead with the dinner without me—and still covering the cost. But then I realized that without a business discussion, it could look like a personal gift.

Instead, I rescheduled the dinner for a time when I could attend and keep the meeting focused on business. It was a simple way to stay aligned with our policies and avoid any misunderstanding.

Kickbacks, Bribery, and Corruption

We do not engage in or allow kickbacks, bribery, or corruption—anywhere, for any reason.

No one at Amgen may offer or promise anything of value (monetary or otherwise) to influence a decision or gain an unfair advantage. This rule applies not just to public officials we interact with, but to anyone we do business with. It also applies when improper conduct is tied to an otherwise legitimate business relationship.

Examples of inappropriate transfers of value include money, gifts, lavish meals, travel, sponsorships, or favors that could be seen as attempts to win influence.

We make sure that any meal, entertainment, or Amgen-sponsored travel is modest, reasonable, and in line with our policies.

We hire and work with only honest people and companies who follow the law and share our values. Our business partners must never use corrupt practices on our behalf. We track and document all payments and expenses to show that our decisions are fair and legal.

These principles apply everywhere we conduct business.

Learn more by reviewing the **ABAC Policy**, Global Government Affairs Gifts and Entertainment Policy, or contact Worldwide Compliance & Business Ethics.

VALUES IN ACTION:

When a team member proposed engaging a physician for a speaking event, I asked why that doctor was chosen. The rationale wasn't entirely based on expertise but included other factors, so I reminded the team that all HCP engagements must align with clear criteria and genuine need. By questioning the proposal and reinforcing Amgen's standards for choosing speakers, I helped uphold our requirements and reduce potential compliance risks.

Political Participation

We keep our personal political activities separate from our work at Amgen. We never use Amgen's money, tools, or time to support personal political causes. Amgen's Global Government Affairs team takes part in permissible political activities on behalf of the company. This team works to support innovation in healthcare and to educate policymakers on key issues—such as making sure patients can access the medicines they need. All of this is done openly and in line with the law.

Learn more by reviewing the **ABAC Policy** or contact Global Government Affairs.

VALUES IN ACTION:

I volunteer for a nonprofit organization that supports a referendum Amgen also supports. I started designing a flyer on my Amgen laptop and was about to send out a "call to action" from my Amgen email address. Then I realized that this may have violated our policy. Since this is a personal activity, I should use my personal computer and personal email—not Amgen's resources. We don't use company tools for political activities unless done specifically as part of work led by or involving the Global Government Affairs team.

Government Organizations and Public Officials

We never offer anything of value to public officials to try to influence a decision, win business, or gain some other improper advantage. Our Global Government Affairs team leads our efforts to educate policymakers on important issues for patients, our company, and society. If a public official asks for information or documents, we don't handle it ourselves—we report it right away to someone on Amgen's Law or Global Government Affairs teams. We are always honest and cooperative during government inspections or investigations.

What Is a Government Organization?

What Is a Public Official?

A government organization is any entity that is part of or operated by the government, including state, federal, or international lawmakers, public hospitals, schools, or government agencies. A public official is anyone who works for one of these organizations—such as a lawmaker, police officer, or political candidate, or anyone in a government role.

Learn more by reviewing the **ABAC Policy** or contact Global Government Affairs.

Ethical Business Partners

We expect our suppliers to follow the law and act with honesty. They must meet the standards in our Supplier Code of Conduct. These standards comprise rules about fair labor, human rights, safety, the environment, and good business practices that include appropriate compliance, controls, and security practices. We screen new suppliers before we work with them and check on current ones to make sure they're following our rules. These rules include global standards for clinical trials, animal care, safety, and fair treatment of workers.

Supply Chain Security

Amgen participates in global security initiatives to safeguard the movement of goods through our supply chain. In the United States, we partner with the Customs Trade Partnership Against Terrorism, and in Europe, we are part of the Authorized Economic Operator program. These programs uphold rigorous standards for storage, shipping, and cargo protection. Our partners must comply with these standards and submit to audits when required.

Learn more by reviewing the [Supplier Code of Conduct](#) or contact Global Strategic Sourcing.

Fair and Independent Competition

We compete fairly, based on the quality and value of our products. We follow all antitrust and competition laws, no matter where we do business.

We never make deals or have discussions with competitors about prices, discounts, costs, wages, or dividing up customers or markets. Collusion with competitors is illegal and goes against our values.

We do not disparage our competitors or their products. We expect them to treat us with the same respect.

Learn more by reviewing the [Antitrust and Unfair Competition Policy](#) or contact Law.

Conflicts of Interest

We make decisions that support Amgen and patients—not our personal interests. We avoid situations where outside relationships or financial interests could influence our judgment—whether the influence is real or perceived.

What Is a Conflict of Interest?

A conflict of interest arises when personal, financial, or other outside interests could compromise—or give the appearance of being able to compromise—our ability to make objective decisions in the best interests of Amgen and patients. **Here are some common examples:**

- Your close family member, friend, or romantic partner is in a direct reporting relationship with you.
- You or someone close to you could make money from an Amgen business decision—like choosing a supplier or vendor.
- You are involved with a business that competes with or works with Amgen.
- You learn about a business opportunity through your work at Amgen and want to take it for yourself or mention it to someone else.

We all must disclose any actual, perceived, or potential conflicts of interest. This allows Amgen to assess the situation and implement safeguards or mitigation strategies, if necessary, such as changing reporting lines or recusing a staff member from a vendor decision.

Learn more by reviewing the [Conflicts of Interest Policy](#) or contact Human Resources.

Information Sharing and Intellectual Property

Anything we create at Amgen belongs to the company. Protecting our ideas, inventions, and information is essential to Amgen's work. We keep our knowledge, work, internal messages, and other company information confidential, and we don't share them outside Amgen. Some information—such as clinical trial results, product formulas, and how we make our products—is especially sensitive. Only people who need it can access it.

We protect our know-how and inventions—our products, how they're used, how we make them, devices, and other technology—by filing patents or keeping them as trade secrets. We also protect confidential information we get from others, including partners, customers, and patients.

If we need to share Amgen information with someone outside the company, we get the right approvals. For publications or presentations, we go through the publication approval process first. For potential partners or collaborators, we also get approval and may use a nondisclosure agreement (NDA). We don't accept confidential information from others unless there's a signed agreement explaining what is shared and how it can be used.

What is Intellectual Property?

Intellectual property refers to the ideas and inventions created by Amgen employees that Amgen can protect by law; it includes patents, copyrights, trademarks, and trade secrets:

- **Patents** protect our products, manufacturing methods, formulations, devices, and uses of our products to treat patients.
- **Copyrights** protect our writing, videos, and graphics.
- **Trademarks** protect our brand names and logos.

We also respect the rights of others. Much of the content on the internet is copyrighted, so we get permission to use it when necessary.

What Is a Trade Secret?

A trade secret is important information that helps Amgen stay competitive because others don't know it. We protect it by keeping it secure and private. If it becomes public, it's no longer legally protected.

Here are some examples of trade secrets:

- Manufacturing methods
- Techniques and formulas
- Cell lines, programs, algorithms, and designs
- Business plans and customer lists
- Other sensitive, competitive information

What Is a Nondisclosure Agreement?

A nondisclosure agreement (NDA), also called a confidential disclosure agreement (CDA), is a legal contract that:

- Explains what confidential information is being shared and why.
- Prevents the other party from sharing or misusing that information.

We use NDAs when we need to share information outside Amgen for business, legal, or other important reasons.

Learn more by reviewing the [Information Classification and Records Management Policy](#) or contact Law.

Financial Integrity

We have a responsibility to provide full, fair, accurate, timely, and clear disclosures in reports and documents we file with governmental and regulatory agencies. You must help ensure that we meet this responsibility. Our CEO and officers in Finance have additional responsibilities and must adhere to a specific Code of Ethics that supplements this Code.

Learn more by reviewing the [Code of Ethics for the CEO, ABAC Policy, and Information Classification and Records Management Policy](#) or contact Law.

Important Note: Financial records are not only those that we report publicly. Records containing financial information are found across the company and form the foundation of our public disclosures. Every financial record in every function must be accurate, true, and complete. If you are involved in preparing reports and documents that Amgen submits to financial regulators, be sure that the content is full, fair, accurate, timely, and clear. Cooperate fully with Amgen's independent public accountants and never take any action to coerce, manipulate, or mislead them.



Amy, Generative Biology lab, Amgen Thousand Oaks

Records Management

We keep clear and accurate records of our work. These records help us meet legal, financial, and business requirements. We follow Amgen's policies and the law when it comes to keeping or disposing of records. Sometimes, we must keep certain records longer because of a special rule called a records hold.

What Is a Records Hold?

A records hold is a legal obligation to keep specific documents. This can happen if a record is needed for a lawsuit, investigation, audit, or similar proceeding. If a records hold is issued, Amgen will be told what documents to keep and for how long. If you are notified that a records hold affects you, Amgen's Law team will let you know which documents need to be preserved, and for how long they need to be preserved. You must follow those instructions exactly.

Learn more by reviewing the [Information Classification and Records Management Policy](#) or contact Law.

VALUES IN ACTION:

I had an email that was part of a records hold. It included something I had written that wasn't accurate. Since I was the author, I thought about deleting it to fix the error.

Then I realized that deleting the email could look like I was hiding something—and it would break our records rules. I left the email as it was and talked to my manager and someone from the Law team about how to correct the mistake the right way.

VALUES IN ACTION:

A contractor on my team was finishing their project, and I was in charge of the offboarding process. I made sure to collect their Amgen-issued laptop and badge on their last day. While reviewing the return checklist, I realized the contractor also had a portable hard drive with company files that hadn't been returned.

I reached out right away and arranged for the drive to be sent back. I also let our Technology team know so they could double-check that the data were secure. It reminded me how important it is to follow every step of the offboarding process—because even small items can hold valuable information.

Company Assets

We take care of Amgen's assets and those of our partners. These assets include money, equipment, devices, systems, and data. We use them properly and take steps to prevent damage, loss, or theft, even when working from home or on the go.

We follow all company rules when using Amgen property. This means, for example:

- Getting approval before using assets for anything outside of work (except for minor personal use).
- Never using assets for personal profit or side businesses, or in violation of company policies.
- Avoiding inappropriate communication—like harassment, fraud, or anything else that violates Amgen policies.

We also protect our electronic systems from threats by:

- Keeping software and security tools up-to-date
- Being careful with downloads, links, and suspicious emails or texts.
- Storing information only on Amgen-approved systems.
- Protecting passwords and locking devices when they're not in use, especially while traveling.

Learn more by reviewing the [Company Systems Use Policy](#) or contact Technology.

Insider Trading

We follow insider trading laws by keeping inside information private and never using it for personal gain. We do not buy or sell Amgen stock if we have material, nonpublic information about our company. We also never share this kind of information with others unless they have a clear need to know for work.

What Are Insider Trading Laws?

Insider trading laws make it illegal to trade the stock of any company when we have important information about that company that hasn't been made public. It's also illegal to give that information to someone else—this is called *tipping*. Even if no one makes a profit, breaking these laws can lead to serious legal consequences.

What Is Material Information?

Material information is any detail that a reasonable investor would think is important in deciding whether to buy or sell a stock. Examples include financial and clinical trial results, regulatory approvals and other government actions, initial public offerings, mergers and acquisitions, litigation, stock splits and buybacks, or major leadership changes. If the information hasn't been made public, it must stay confidential.

Learn more by reviewing the [Insider Trading Policy](#) or contact Law.

VALUES IN ACTION:

I heard important news about one of our clinical trials. This information hadn't been made public yet. I often talk to my brother about work, and I mentioned the news to him. He later told me he had traded Amgen stock based on what I said—and made money from it.

That's when I realized I had shared insider information. I should not have done that. I immediately reported the situation to our Law team so they could take the right steps.

VALUES IN ACTION:

I am working on a research project with a university in another country and plan to travel there with some technical data and R&D samples. I want to be helpful and bring the materials with me, but I know that even items in my carry-on could be considered an export, and the technical data could have dual use (civilian and military).

Export-control laws are complex, so I checked with our Global Trade Compliance team before the trip. They helped make sure I followed the rules correctly and avoided any legal risk.

Trade Regulations

We all have a role in following trade laws and regulations. These rules apply to how we move materials, products, and technology, and to how financial transaction payments are made. They also cover economic sanctions and export-control restrictions.

We also comply with anti-boycott laws. If a vendor, customer, supplier, or potential business partner asks Amgen to join a boycott that is not sanctioned by the U.S. government, we report it through the appropriate Amgen channel. Since Amgen is a U.S. company, all Amgen staff in foreign sites and affiliates are covered by this policy. Amgen Tax team is required to report such requests to the U.S. Department of the Treasury. Amgen Global Trade Compliance is required to report such requests to the Bureau of Industry and Security, an agency of the U.S. Department of Commerce.

What Is a Boycott?

A boycott is when people or organizations refuse to buy, use, or support a product, service, or company to protest or push for change. Boycott laws are meant to ensure that trade stays fair and free from outside political pressure.

Learn more by reviewing the [Trade Compliance Policy](#) or contact Worldwide Compliance & Business Ethics.

Brand and Reputation

Amgen has built a strong reputation over more than 40 years. We protect that trust by acting with integrity and communicating clearly.

We are careful and consistent when we talk about the company. If a reporter, investor, or outside group contacts us, we do not respond to them ourselves. We make sure an approved Amgen spokesperson handles it.

Although most of us are not official spokespeople, we still represent Amgen when we talk about our work—in person or online. So, when we speak about Amgen, we do it in a way that supports our company's values and follows company policies. When using social media:

- We do not speak on behalf of Amgen unless authorized.
- We do not share confidential, internal, or nonpublic information.
- We do not make claims about Amgen or competitor products.
- We do not report product complaints or safety issues.

Social Media

Specific to U.S. employees:

- We **may** like and share, but may not comment on, product- or pipeline-related content from Amgen social media channels.
- We **may not** add additional comments when sharing product- or pipeline-related content. This requirement also extends to a competitor's product- or pipeline-related content.

Specific to employees outside the United States:

- We **may not** like, share, comment, or post anything on social media featuring Amgen or competitor product- or pipeline-related content.

When using social media, we refer to our global Social Media Policy and the policy for our country.

We also use Amgen's core messaging tools to help us communicate in ways that support our mission.

Learn more by reviewing the **Social Media Policy** or contact Corporate Affairs.

VALUES IN ACTION:

I saw a post from a patient talking about their experience with an Amgen product. I wanted to comment to show support, but then I remembered our Social Media Policy. It doesn't allow us to comment on posts that mention Amgen product or pipeline content. I chose not to respond and followed our policy instead.





WE DO WHAT'S RIGHT FOR OUR SOCIETY

Why It Matters: We take our responsibility to patients, customers, investors, communities, and the environment seriously. While we work to deliver value for our shareholders, we also commit to acting in ways that are ethical, sustainable, and positive for the world around us. Being a responsible company helps us support our communities and earn the trust of everyone we work with. It's a key part of our long-term success. We follow sustainability framework principles in our daily work. Our sustainability efforts are based on three pillars: Healthy Patients & Communities, Healthy Planet, and Healthy Amgen. We include these sustainability priorities in everything we do. We also make sure our suppliers share our values and follow strong human rights standards. We take pride in giving back to the communities where we live and work.



Employees at Amgen's 20th International Coastal Cleanup

Responsible Global Citizens

We do our part to support patients and the places where we live and work. We give back to local communities and help advance science. We believe in treating everyone with respect and dignity. We follow the key tenets of the United Nations' Universal Declaration of Human Rights. We respect human rights everywhere we do business. We prohibit human trafficking, forced labor, and child labor in our operations, and we expect the same from our suppliers.

These values help us earn trust and make a positive impact on the world around us.

Ethics and Sustainability

We take care of people and the planet by acting in safe, smart, and honest ways. We follow all laws and rules that protect health and the environment. We work to reduce pollution, use fewer resources, and cut down on waste. We also make sure buildings and systems are designed to be safe and green. If there is a risk to the environment, we report it right away.

Learn more by reviewing the [Our Responsibility Site](#) and our [Human Rights Position Statement](#) or contact Law.

VALUES IN ACTION:

I saw a subcontractor throwing away chemicals in a regular trash bin. It looked unsafe, but I hesitated because they weren't an Amgen employee. I spoke with my manager and learned that our safety rules apply to everyone on site, including vendors.

I reported the issue to our local Environment, Health, and Safety team. They took it seriously and said they would look into it. I was glad I spoke up—safe practices are everyone's responsibility.

AMGEN