

### 1. Scope

Applicable to all Amgen Inc. and subsidiary or affiliated company staff members, consultants, contract workers, secondees, and temporary staff worldwide (“Covered Persons”). Consultants, contract workers, secondees, and temporary staff are not Amgen employees, and nothing in this Policy should be construed to the contrary.

### 2. Policy

At Amgen, we are committed to the highest level of ethical business conduct, including compliance with applicable anti-bribery and anti-corruption (“ABAC”) laws and regulations. Amgen will compete lawfully and ethically in the marketplace and expects Covered Persons to conduct all aspects of Amgen business with integrity.

This policy covers Amgen’s general principles and standards relating to ABAC compliance and maintenance of business documentation and financial records. It reinforces that we have no tolerance for bribery or corruption and that we are committed to maintaining accurate records of our business dealings. All of us are responsible for preventing any instance of bribery or corruption and for reporting any concern or suspicion.

Many countries in which Amgen does business have enacted ABAC laws and regulations. Examples include but are not limited to, the United States’ Foreign Corrupt Practices Act (“FCPA”), United Kingdom’s Bribery Act (“UKBA”), and Brazil’s Clean Company Act (“BCCA”). These laws and regulations share many similar requirements including extraterritorial applications, but vary in certain respects.

#### General Principles

##### Covered Persons must not:

- Directly or indirectly (i.e., through a third party), offer, promise, authorize, or give anything of value in order to obtain an improper advantage by influencing the judgment or conduct of a person.
- Directly or indirectly, solicit, request, or accept anything of value intended to improperly influence their judgment or conduct in their job responsibilities

##### Covered Persons must:

- Understand and comply with Amgen’s ABAC principles and standards as well as with all applicable ABAC laws and regulations; and
- Abstain from any activities that might violate or give any appearance of intention to violate such laws and regulations.

These general principles do not distinguish between government officials and private individuals, or commercial and non-commercial activities. Seek guidance from the Law Department, Compliance Leads, Chief Compliance Officer, and/or through the Business Conduct Hotline in any circumstances where doubt exists as to the appropriateness of proposed conduct.

### **Interactions and Engagements with Government Officials**

As a global biotechnology company, Amgen must be particularly sensitive to interactions and engagements involving government officials, whether directly or indirectly through third parties. The terms “government official” and “foreign official” are broadly interpreted under the FCPA and ABAC laws and regulations of other countries. For purposes of this policy, Amgen has defined “Government Official” as any officer or employee of a non-US government or any non-US department or instrumentality of a government (e.g., non-US government-owned or controlled businesses such as hospitals), any officer or employee of a public international organization (e.g., World Health Organization, United Nations, etc.), and any person acting in an official capacity for or on behalf of any such non-US government or department, agency, or instrumentality or for or on behalf of any such public international organizations. In keeping with the FCPA, Amgen has also defined the term “Government Official” to include any political party or candidate for political office and their representatives.

In various enforcement actions, U.S. and foreign law enforcement agencies have taken the position that certain healthcare professionals fall within the FCPA’s or other ABAC laws and regulations’ definition of “government official” or “foreign official.” This category of healthcare professionals includes those who are employed by, teach at, or have privileges at government-owned or controlled hospitals or public universities outside the United States. In keeping with its commitment to the highest level of ethical business conduct, Amgen applies this broad interpretation of “government official” and “foreign official” in this policy.

### **Working with Third Parties**

A Third Party is any non-Amgen individual, party, or entity with whom Amgen interacts or engages to conduct business; this category includes, but is not limited to, distributors, business partners, promotional/marketing agencies, travel agencies, meeting organizers, contract sales force, clinical research organizations, functional service providers, investigators, and customs brokers.

Although there are legal distinctions between Amgen and Third Parties (under corporate, employment, and tax laws, for example), U.S., and foreign law enforcement agencies have held companies accountable for acts of their third-party business partners in certain situations regardless of the way in which the legal relationship with the third party was structured. Thus, it is important to recognize that while Third Parties can be important to Amgen’s business success, U.S. and foreign law enforcement agencies may hold Amgen responsible for Third Parties’ misconduct.

We must take particular care to ensure Third Parties do not breach the requirements of this policy. To that end, Amgen must only engage Third Parties after conducting appropriate due diligence in advance of the engagement. Further, compensation provided to Third Parties should be in return for their legitimate services or goods. As the general principles make clear, Covered Persons must not use Third Parties to offer, promise, authorize, or give anything of value to another for improper purposes.

Questions regarding whether a person or entity qualifies as a Third Party under this Policy should be directed to the Law Department, Compliance Leads, Chief Compliance Officer, and/or through the Business Conduct Hotline.

### **“Facilitating” or “Expediting” Payments**

Occasionally, Covered Persons may be asked by low-level bureaucrats or other Government Officials for a payment to persuade them to perform their administrative, non-discretionary functions (e.g., processing of routine paperwork, visas, applications or clearance of goods through customs, etc.). These are often referred to as “facilitating” or “expediting” payments. These payments are illegal in most countries, and Amgen prohibits Covered Persons from paying, offering or authorizing such payments or offers, whether directly or indirectly through Third Parties. All requests or demands for facilitating or expediting payments must be reported in accordance with the reporting obligations set forth below.

### **Expenditures for Product Promotion and Related Activities**

Certain expenditures, such as those required for travel, meals or lodging, for purposes of promoting, demonstrating or explaining products or services or executing or carrying out a contract are normally permitted, provided that the expenditures are reasonable and bona fide and are not made for the purpose of securing an improper advantage or improperly influencing anyone’s decision on awarding or continuing business. All such expenditures should be reasonable in amount and consistent with Amgen’s policies on expenditures of this kind in other contexts. In no event should they be made where doubt exists as to the appropriateness of said activities.

### **Accounting Records and Internal Controls Procedures**

It is Amgen’s policy to keep books and records that accurately and fairly reflect Amgen’s transactions in reasonable detail and maintain internal controls to prevent and detect potential violations of Amgen’s policies or of applicable laws.

No false or artificial entries may be made in the books and records for any reason, and all payments and transactions, regardless of value, must be recorded accurately. This includes but not limited to third-party reimbursements of prior agreed upon expenses. Amgen also expects that any records provided by Third Parties to Amgen will be accurate and include reasonable detail.

### **Sanctions for Violating ABAC Laws**

The sanctions for violating applicable ABAC laws and regulations, including the FCPA, are severe. Sanctions may be applied not only to Amgen, but also to Amgen’s directors, its shareholders and employees. Depending upon the offense, fines can be quite severe, and, in the case of an individual, a violation may also lead to imprisonment.

Regardless of whether sanctions are imposed, a violation of ABAC laws and regulations could seriously damage Amgen’s reputation and image, which are among our most important assets.

### **To Ensure Compliance with ABAC laws and regulations, Covered Persons Should:**

- Consult with the Law Department, Compliance Leads, Chief Compliance Officer, and/or through the Business Conduct Hotline if you have the slightest doubt about the propriety of a payment or the giving of a gift or gratuity. Ask questions if the circumstances are at all unusual or unfamiliar.
- Be sure that all Covered Persons are aware of this Policy, understand it, have received training and agree to follow it.

- Watch for "red flags" (e.g., situations and/or transactions that don't appear to have a legitimate business purpose, are extravagant, etc.) such as a payment, discount, or commission that are unusually structured or larger than is standard for the deal and when you are less than confident as to the appropriateness of the payment.
- Make sure all agreements are in writing and that services are properly described. If you are suspicious of the activities of the other party, consult the Law Department, Compliance Leads, Chief Compliance Officer, and/or through the Business Conduct Hotline.
- Conduct Amgen business in compliance with the laws of all countries in which the company does business.
- Comply with generally accepted accounting principles and established internal accounting controls and procedures at all times.
- Ensure all Amgen records reasonably, accurately and fairly reflect the transactions of Amgen and the disposition of its assets.
- Ensure when considering engaging a Third Party that due diligence into its business reputation, qualifications, and associations with Government Officials is performed in accordance with any applicable Amgen procedures.
- Consult with the Law Department, Compliance Leads, Chief Compliance Officer, and/or through the Business Conduct Hotline if there is a concern a Third Party engaged by Amgen may be acting in violation of this Policy.

This Policy is not intended to make Covered Persons experts on ABAC laws and regulations, but rather, to help Covered Persons recognize situations and payments that might raise legal and ethical concerns. It is important that each Covered Person with responsibilities that might give rise to potential liabilities under applicable ABAC laws and regulations follows the guidelines contained in this Policy and works closely with the Law Department, Compliance Leads, Chief Compliance Officer, and/or through the Business Conduct Hotline to avoid even the appearance of a violation.

**To Ensure Compliance with ABAC Laws and Regulations, Covered Persons Must Not:**

- Establish any undisclosed, secret, or unrecorded funds or assets of Amgen.
- Make any false, inflated or artificial entries in the books and records of an Amgen company for any reason whatsoever.
- Use Amgen funds or assets for any unlawful, improper, or unethical purpose.
- Falsify any accounting records or documents relating to any transaction in any way that may obscure or disguise the true nature of the transaction or activity.
- Lie to auditors.
- Make or approve payment on behalf of Amgen without adequate supporting documentation or with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment.

- Become involved in any arrangement or activity that results in any of the previously stated prohibited acts or may lead to a violation of applicable ABAC laws and regulations.

#### **Exceptions or Possible Violations**

Contact the Law Department, Compliance Leads, Chief Compliance Officer, and/or the Business Conduct Hotline for:

- Any exceptions to this Policy;
- Possible violations of this Policy;
- If you have any questions or comments concerning this Policy; or
- If you are aware of a situation that you believe may be unlawful or unethical.

### **3. Additional Information**

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.

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 requirements 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.