

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

A culture of corporate compliance is best achieved in an environment that promotes open communication, including open and candid discussion of concerns about compliance with applicable laws, regulations, and Amgen policy. All managers are responsible for creating and maintaining a work environment that encourages (1) asking questions about compliance with legal and regulatory requirements, the Amgen Code of Conduct, and Amgen policies and other governance documents, and (2) reporting of concerns regarding business conduct.

It is Amgen’s policy to provide an effective process for Covered Persons to express concerns or report potential violations regarding Amgen business conduct (including potential misconduct by other Covered Persons) without retaliation or intimidation, in accordance with applicable laws and regulations, and to require the reporting of any such concerns. This Policy sets forth information and resources for Covered Persons to ask questions and report concerns regarding Amgen business conduct, legal and regulatory compliance. Additional information on where to direct questions or how to report concerns about specific types of conduct may be found in other Amgen policies, procedures, or governance documents. For example, Covered Persons in the U.S. and Puerto Rico who have questions or wish to report a concern or raise an objection about perceived discrimination, harassment, and/or related retaliation should refer to Amgen’s Equal Employment Opportunity, Anti-Discrimination, and Anti-Harassment Policy for additional information.

Asking Questions About Compliance Requirements

Covered Persons are encouraged to ask questions about Amgen’s compliance policies, procedures and practices and are expected to ask questions if they are unsure whether an action, activity, or decision is consistent with law, regulation, Amgen policy or other governance document, or good business ethics in line with the Amgen Values. To ask compliance questions, Covered Persons may consult (in no particular order):

- **Manager:** In most instances, the Covered Person’s immediate manager can answer questions about Amgen’s compliance policies, procedures, or practices and help resolve issues in the most timely and efficient manner.
- **Compliance:** Amgen has regional and local compliance representatives who are available to provide assistance to Covered Persons, including answering compliance questions.
- **Human Resources:** HR Business Partners and Staff Relations (U.S. and Puerto Rico) can answer many questions, including questions about Amgen’s employment, personnel, and general business conduct policies and procedures. Questions for Staff Relations should be directed to HR Connect.
- **Ombudsperson:** Amgen has established an Ombudsperson to provide Covered Persons with additional opportunities to ask questions.

- Law Department: Members of the Law Department are available to answer questions relating to legal and regulatory matters.
- Compliance Council Members: Each functional unit has at least one representative who sits on the Compliance Council and who is knowledgeable about compliance policies and procedures for the function's activities.
- Business Conduct Hotline: Covered Persons may ask questions via the Amgen Business Conduct Hotline.

Reporting Possible Compliance Violations

Multiple reporting options are provided in this Policy and in Amgen's Code of Conduct. Included in these options is the Business Conduct Hotline, which Covered Persons may contact at any time of the day or night to report possible violations of the Code of Conduct, an Amgen policy or governance document, an applicable law or regulation, or other conduct that is inconsistent with Amgen values.

- In most locations, including the U.S., calls to the Business Conduct Hotline may be made anonymously, but local laws in some countries discourage or prohibit anonymous reporting. In addition, some countries restrict the scope of what may be reported via a hotline, such as allowing only reports of accounting and financial irregularities.
- When Covered Persons call the Business Conduct Hotline, they will be asked to provide details of the incident or issue being reported. In order to thoroughly investigate a report, Amgen may find it necessary to ask the person making the report to disclose his or her identity in order to facilitate follow-up questions and to authorize the disclosure of his/her identity to Amgen (or information that could result in his/her identification). If the reporting person decides not to provide such information, Amgen may not be able to investigate the matter fully and/or take remedial action.
- Amgen takes all calls to the Business Conduct Hotline seriously, including whether investigation or remedial action is necessary.
- Amgen staff members may also report compliance violations to their HR Business Partner, Staff Relations, the Ombudsperson, or Compliance Council Members. Covered Persons should also be familiar with other hotline numbers that may be appropriate for reporting specific matters (e.g., adverse event and product complaint reporting).
- Nothing in this Policy prohibits Covered Persons from reporting possible violations of law or regulation to any federal, state or local governmental agency or entity, or from making other disclosures that are protected under applicable law or regulation.

Appropriate Matters for Reporting

Generally, appropriate matters for reporting include good-faith concerns regarding compliance issues or misconduct, such as:

- Violations of law or regulation (whether in the United States or elsewhere);
- Violations of the Code of Conduct, Amgen policy or other governance documents, or standards of business conduct;
- Violations of policies regarding financial disclosures, accounting, accounting controls, or auditing matters; and

- Any other serious wrongdoing or unethical conduct within Amgen, including but not limited to, conduct that is inconsistent with the Amgen Values.

Prohibition Against Retaliation

In accordance with applicable laws and regulations, Amgen policy prohibits any form of retaliation or intimidation against Covered Persons for:

- reporting a compliance concern in good faith,
- objecting to conduct that may constitute a compliance violation, or
- for good faith participation in any investigation or other proceeding related to such a report,

even if Amgen ultimately concludes that there was no violation. The scope of this prohibition against retaliation extends to reports made through the Business Conduct Hotline or any other appropriate means.

Amgen staff members who engage in retaliation or intimidation in violation of this Policy will be subject to disciplinary action, up to and including termination, to the extent permitted by local laws. Any person who retaliates against another person for reporting actual or potential violations of law or regulation also may be subject to criminal and civil liability under U.S. federal and state laws and the laws of other countries.

Cooperating in Investigations and Litigation

Covered Persons must cooperate with internal investigations undertaken by Amgen and with Amgen's defense or prosecution of litigation.

- Covered Persons must follow all directions provided when contacted to participate in an internal investigation. Requirements include Covered Persons making themselves available to internal investigators immediately upon request, being fully forthcoming and truthful with investigators, and providing complete and accurate information (including tangible items such as documents, recordings, and the like).
- Covered Persons must cooperate fully with Amgen and its outside counsel in defending or prosecuting litigation on behalf of Amgen by completely and truthfully responding to company requests for information and documents. If Covered Persons provide testimony in litigation matters, such testimony must be complete and truthful.

3. Covered Persons Responsibility for Compliance

Every Covered Person worldwide is required to follow and employ reasonable steps in preventing violations of (1) the Amgen Code of Conduct, (2) laws and regulations applicable in the relevant jurisdictions, and (3) Amgen policies and other governance documents applicable to him or her. Covered Persons are also required to report any conduct that may violate such laws, regulations, the Amgen Code of Conduct, and Amgen policies and other 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. 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) applicable laws and regulations, the Amgen Code of Conduct, and Amgen policies and other 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 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.