

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 respect personal privacy and everyone at Amgen has a role to play in protecting, securing and appropriately Processing Personal Information that has been entrusted to us.

Amgen, and parties acting on our behalf, Process various types of Personal Information about patients, caregivers, consumers, clinical trial subjects, healthcare professionals (e.g., physicians or nurse practitioners), Covered Persons, and others for a variety of lawful business purposes. The lawful collection and use of such information is important to Amgen’s business activities. We are required by applicable privacy and data protection laws to implement appropriate safeguards to protect Personal Information.

Unlawful or unauthorized collection, use or disclosure of Personal Information could adversely affect the individuals whose information is compromised, as well as potentially expose Amgen to legal and regulatory risks, financial damage and reputational harm. As privacy and data protection laws continue to multiply and expand around the world, Amgen complies with all such relevant applicable laws and regulations that protect Personal Information. In addition, reported Privacy Incidents are appropriately addressed in a prompt manner.

This Policy states Amgen’s commitment to the proper Processing and protection of Personal Information.

Nothing herein is intended to nor shall modify or supersede any other Amgen policy to which Covered Persons are subject, including but not limited to Amgen’s Use of Company Systems and Internet Conduct Policy.

Definitions

Term	Definition
Binding Corporate Rules (BCRs)	Internal rules adopted by Amgen which define Amgen’s global policy regarding the international transfers of Personal Information of individuals residing in Europe and other Regulated Countries. A “Regulated Country” means a country located in Europe or a country deemed adequate by a decision of the European Commission with respect to the protection of Personal Information. To access the BCRs, please visit http://www.amgen.com/bcr/ .

Term	Definition
Personal Information	<p>Definitions for Personal Information may vary by region, business unit or data type, depending on legal, regulatory and policy requirements, but at Amgen, "Personal Information" means information relating to an individual whose identity is apparent, or can be ascertained, from the information, by direct or indirect means.</p> <p>Alternatively, Personal Information may be thought of as information that can, either alone or in combination with other information, identify, or be used to contact or locate a single individual. Examples of Personal Information may include the following, subject to applicable laws and regulations:</p> <ul style="list-style-type: none"> ▪ An individual's name, address and telephone number ▪ The professional education and prescribing practices of a healthcare professional ▪ The email address and other identifying information provided by someone visiting an Amgen website <p>The above list is exemplary only and not exhaustive. Some types of Personal Information, such as health or financial information, may be entitled to special protections under applicable laws and regulations. See definition of Sensitive Personal Information below.</p>
Privacy Incident	<p>Any actual or reasonably suspected: (i) unauthorized access to Personal Information; (ii) unauthorized use of Personal Information; (iii) unauthorized disclosure or alteration of Personal Information; or (iv) loss of Personal Information (e.g., loss of Personal Information in paper format or in a database on a device such as a smart phone or computer laptop).</p>
Process (or any variation thereof)	<p>Any operation or set of operations that is performed on Personal Information, whether or not by automatic means, such as collecting, viewing, accessing, storing, recording, organizing, adapting or altering, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.</p>

Term	Definition
Sensitive Personal Information	<p>Information about an individual's:</p> <ul style="list-style-type: none"> ▪ Medical or health conditions (physical or mental) ▪ Financial information ▪ Racial or ethnic origin ▪ Political opinions ▪ Religious or philosophical beliefs ▪ Trade-union membership ▪ Sex life or sexual orientation ▪ Criminal convictions or arrest history <p>Information that could be used to perpetrate identity theft, (e.g., Social Security Number, driver's license number, credit card or other bank account information)</p> <p>Note that the definition of what is considered sensitive varies by jurisdiction and regulation.</p>

General Guidelines for Protecting and Processing Personal Information

Covered Persons must:

Comply with the following requirements in connection with the Processing of Personal Information:

- All privacy and data protection laws and regulations applicable in the relevant jurisdictions and industry standards;
- Amgen's Binding Corporate Rules, as applicable to international transfers of Personal Information of individuals residing in Europe and other Regulated Countries;
- Amgen governance documents (including enterprise-wide and functional governance documents relating to this Policy). Please note that governance documents may vary depending on the location of the affected functions, business units and Covered Persons, and the nature of the Personal Information involved; and
- Contractual commitments, protocols or notifications (e.g., commitments made in clinical trial subject informed consent forms or in an Amgen Web site's privacy statement).
- Only transfer or provide access to Personal Information to a third party that (a) has a legitimate Amgen business need to receive such information and (b) will protect and Process such information in a manner consistent with Amgen's enterprise-wide and functional governance documents that relate to this Policy.
- Report Privacy Incidents in accordance with Amgen's enterprise-wide and functional governance documents that relate to this Policy.
- Implement appropriate security measures to protect Personal Information against unauthorized and/or improper use, disclosure, access, modification, destruction, alteration or storage in accordance with Amgen's enterprise-wide and functional governance documents that relate to this Policy.

- Retain or delete Personal Information in accordance with Amgen’s enterprise-wide and functional governance documents that relate to this Policy including any applicable Hold Orders.

Nothing in this Policy limits Amgen’s efforts to monitor compliance with other Amgen governance documents, or limits Amgen’s lawful obligations to disclose Personal Information.

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.