

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.

Term	Definition
Controlled Technology	Specific information (e.g., technical data, documents) required for the development, production or use of certain items that are controlled under U.S. export control regulations.
Deemed Export	The “release” of controlled technology or otherwise transferring of technology or source code to a foreign person is deemed to be an export to that individual’s country of nationality. An export license may be required prior to the release depending on the foreign person’s country of nationality and the export classification of the technology.
Foreign Person	In the context of U.S. export controls laws and regulations refers to a natural person who does not have a protected status (i.e. a U.S. citizen or national, U.S. Lawful Permanent Resident, a person granted asylum or refugee status in the U.S. or a Temporary Resident).
Release of Technology	May occur through visual inspection (e.g., viewing technical specifications, plans, blueprints, etc.), through a conversation / discussion, or when made available by practice or application under the guidance of persons with knowledge of the technology. In addition, posting information to an unsecured shared drive or other network site (e.g., LAN, Box, SharePoint) may be deemed release of technology.

2. Policy

It is Amgen’s policy to comply with all applicable export and import control laws and regulations. This Policy sets forth the requirements for proper trade compliance activities conducted by Amgen, including export and import of goods, software, or technology.

Export Control Laws

- Amgen is committed to ensure that its global supply chain is not interrupted, and the movement of goods, including any items shipped or hand-carried by Amgen staff, complies with international trade regulations. These include trade regulations specific to each country’s jurisdiction, as well as, the United States (“U.S.”) laws having an extraterritorial scope of application.
- In the U.S. there is a network of federal agencies and inter-related laws and regulations, such as the Department of Commerce’s Bureau of Industry and Security, the Treasury Department’s Office of Foreign Assets Control and, the Export Administration Regulations (“EAR”), among others, that govern exports; collectively referred in this policy as Export Controls. These in many cases restrict the exports of goods, software and technology, for reasons of national security, economic and/or foreign policy concerns. All Amgen subsidiaries, as well as all U.S. Covered Persons, including U.S. citizens and permanent

resident aliens, wherever located, are responsible for complying with the U.S. Export Controls.

- Although, most exports do not require a government license, these may be mandatory for certain materials (e.g. pathogens and toxins). Exports of goods and technology intended to be exported to an embargoed or sanctioned country, to an end-user of concern, or in support of a prohibited end-use, may require an export license. Similarly, a license may be required prior to the Release of Controlled Technology to a Foreign Person following specific criteria in the EAR. Thus, the release of goods outside the U.S., and release of software or technology (e.g. technical data or information) to Foreign Persons in the U.S. or outside the U.S. are subject to Export Controls and should be reviewed in accordance with this policy.
- Amgen must adhere to anti-boycott regulations requiring U.S. companies and their subsidiaries to refuse discriminatory requests toward a country in connection with international transactions. Complying with any such boycott requests is prohibited and companies are required to report them to the pertinent authorities.
- Failure to comply with export laws and regulations can result in civil and criminal penalties for Amgen and Covered Persons, as well as suspension or denial of export privileges (e.g. debarment from U.S. Government procurement). Countries other than the U.S., also have export control restrictions, and Covered Persons are required to follow all applicable laws and regulations related to exports.

Import Control Laws

- Countries regulate the flow of goods, technology and persons into their borders. Import Controls are imposed by means of restrictions, such as duties on imported goods, import licenses and measures preventing entry of illegal or harmful items. Additionally, these establish the legal responsibility of the importer for declaring the accurate product description, value, classification, and rate of duty applicable to entered goods.
- In the U.S., for example, Customs and Border Protection (“CBP”), a division of the U.S. Department of Homeland Security, secures and facilitates trade and travel into the U.S. Many of the regulations enforced by CBP are intended to assure that goods entering the country are legitimate and that appropriate duties and fees are paid. Wherever Amgen operates, Covered Persons are required to follow all Import Control laws. Violations of Import Control laws may result in import goods, including hand-carries, being rejected or seized. Departures may result in the imposition of civil and criminal penalties to Amgen and Covered Persons.
- Depending on the commodities, other government agencies have jurisdiction and regulate Amgen imports and exports to/from the U.S. Among them, the U.S. Food and Drug Administration, the U.S. Department of Agriculture and the Centers for Disease Control and Prevention.
- Similar agencies may exist globally. Covered Persons shall ensure adherence to country specific governmental agency regulations. Generally, these regulations are in addition to, and not in lieu of, the U.S. regulations imposed by the agencies referenced above.

General Guidelines for Compliance with Export and Import Laws

Covered Persons are advised to consult Amgen's trade compliance group, for guidance in advance of a planned import or export transaction. Some transactions may be prohibited or restricted and require securing permits or licenses prior to the transaction.

- Covered Persons must comply with export and import controls and requirements when any of the following occurs (this is a non-exhaustive list):
 - Shipment or movement of goods (including hand-carries) across international borders whether between Amgen locations or third parties on Amgen's behalf, including research organizations, contract manufacturers, any service providers and other business partners;
 - Creation of international shipping documentation such as customs/commercial invoices, statements of product origin, shipping waybills, or any documentation that contains information that must be reported to the government agencies at the border;
 - Transfer of Controlled Technology between Amgen's international locations, as these may require the issuance of a license prior to the transaction. The transfer of Controlled Technology to a Foreign Person (either verbally or in written form) may be subject to Deemed Export regulations. This includes transfer of technical data, blueprints, training on specific methods and/or technologies needed for product use, development and/or production;
 - Hiring or retaining the services of Foreign Persons either within or outside the U.S. into facilities with Controlled Technology is subject to review by the Global Trade Office;
 - Exportation of telecommunication and information security software via electronic means or by physical delivery in electronic form or on a media;
 - Traveling to / engaging in activities in embargoed or sanctioned countries or territories.
- Covered Persons are required to follow all procedures that Amgen has established to ensure export and import compliance, including:
 - Providing accurate and complete information on imported and exported goods where such information is required;
 - Valuing goods in alignment with applicable regulations and Amgen policies;
 - Marking goods with the appropriate country of origin and including any additional labeling statements where providing such information is required.
 - Maintaining and retaining relevant records in accordance with the regulations and Amgen Record Retention Schedule.
 - Contacting Amgen's trade compliance group for an advance import and export documentation review.
 - Reporting to Amgen's trade compliance group and refusing any requests that are discriminatory towards a country or a business made in connection with international transactions (e.g. requesting inclusion of a discriminatory statement in a contract, letter of credit or shipping documentation).

- Covered Persons should contact Amgen’s trade compliance group if they have any questions about international transfer of goods, software, or technology.
- Covered Persons are prohibited from making payments or offering anything of value to Government Officials in order to influence those officials’ behavior in relation to import or export shipments, clearances, licenses, permits, certificates or statements. In the event there is a threat that a Government Official is withholding Amgen’s business, Covered Persons are required, in advance of taking any action, to contact local Amgen Management and the Law Department immediately to discuss the situation and permissible options.

Basic Shipping Procedures

- Because of the complexity of export and import laws, Covered Persons are required to follow these procedures:
 - All international exportation activity must be conducted via approved shipping locations for final processing. Third parties exporting or importing on behalf of Amgen must be instructed to contact Amgen’s trade compliance group to ensure compliant transactions.
 - All internationally shipped goods must be accompanied by documentation to meet customs and other government agencies’ rules and regulations. Consult Amgen’s trade compliance group to review the documentation for shipments as well as for general guidance on international shipping procedures and processes, including documentation, Customs valuation, country of origin, tariff classification, right to import, import duties/taxes, Free Trade Agreements and other special programs, Incoterms® rules and any other aspects of international trade.

3. Additional Information

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, (2) know the Amgen Code of Conduct and Amgen policies and other governance documents applicable to the activities they manage or supervise, (3) ensure their direct reports have appropriate training on compliance requirements to perform their job functions, and (4) 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.