

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. Definitions

Term	Definition
Conflict of Interest	<p>A Conflict of Interest exists any time a Covered Person permits any interest other than the Company’s interest to influence the manner in which they conduct Amgen business. Examples of a Conflict of Interest include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Misuse of a Covered Person’s position with Amgen for personal gain or the gain of someone with whom the Covered Person has a close, personal relationship (e.g., a friend or family member) • Outside employment or business activities contrary to Amgen’s business interests (e.g., employment with a competitor of Amgen or supplier to Amgen or prescriber of Amgen products) • Referral of or improperly influencing the referral of Amgen business to any entity controlled by a Covered Person or someone with whom the Covered Person has a close, personal relationship (e.g., a friend or family member) • Soliciting or accepting a Gift from any person or firm doing or seeking to do business with Amgen unless such acceptance is allowed under the exceptions set forth below.
Covered Person	All Amgen Inc. and subsidiary or affiliated company staff members, consultants, contract workers, secondees and temporary staff worldwide.
Gift	A Gift is any good or service provided to a Covered Person for their personal enjoyment, including but not limited to, tickets to sporting events, meals, and/or entertainment. A Gift, however, does not include a meal covered by any person or firm doing or seeking to do business with Amgen if provided in the ordinary course of business (i.e., reasonably-priced lunches and dinners that are neither intended nor likely to be perceived as intended to influence Amgen’s business decisions).
Governance Documents	Amgen’s written policies, standards, procedures, business practices, and manuals

3. Policy

Consistent with Amgen's duties to its shareholders, business decisions must be made with the Company's best interests in mind and without regard to a Covered Person's personal benefit. Covered Persons therefore are prohibited from engaging in any activity, practice, or relationship that creates or could be perceived to create a conflict with Amgen's interests. Covered Persons are obligated to avoid and disclose ethical, legal, financial, or other conflicts of interest (real or perceived) involving Amgen and remove themselves from a position of decision-making authority with respect to any conflict situation involving Amgen.

This Policy sets forth requirements for proper handling of situations that may present or create the appearance of a Conflict of Interest, as defined above.

Avoiding Conflicts of Interest

Covered Persons must use care to avoid any Conflict of Interest, as well as the appearance of a Conflict of Interest in any situation where a reasonable person may question whether the Covered Person was influenced by interests other than Amgen's interests. To avoid a Conflict of Interest or even the perception of one, Covered Persons must do the following:

Gifts

Covered Persons may not solicit or accept a Gift from any person or firm doing or seeking to do business with Amgen. If a Covered Person receives such a Gift, the Covered Person must return it with a note of explanation. If returning the Gift is not practical, the Covered Person must dispose of the Gift without obtaining personal gain.

Cultural Courtesy Gifts Exception: Covered Persons may accept a Gift on behalf of Amgen from any person or firm doing or seeking to do business with Amgen if refusal of the Gift would likely cause cultural offense or embarrassment. In these rare instances, Covered Persons may accept the Gift provided that the following all apply:

- The receipt of the Gift is legal and customary or ceremonial in that culture
- The Gift is of nominal value (e.g., ceremonial tea sets or plates, New Year's calendars, baby gifts, perishable goods, etc.)
- The Gift is not cash or a cash equivalent (e.g., a check or pre-paid debit card)
- The Gift is neither intended nor likely to be perceived as intended to influence the Covered Person's business decisions on behalf of Amgen
- The Covered Person informs their manager of the Gift; and
- The Covered Person does not sell the Gift.

Other Gift Exceptions: Covered Persons may request an exception to the Gift requirements through the following steps:

- The Covered Person must request an Amgen SVP or above to seek the exception on the Covered Person's behalf.
- The exception must be approved by two of the following:
 - Chief Compliance Officer
 - General Counsel

- SVP, Human Resources
- If the Covered Person is the CEO, exception must be approved by the Lead Director, or in the Lead Director's absence, the chair of the Audit Committee of the Board of Directors.
- The Covered Person shall maintain documentation of the approval.

Third-Party Business Engagements

Covered Persons must deal with all suppliers, customers, and other third parties doing business or seeking to do business with Amgen in an objective, professional, and fair manner and in accordance with applicable policies and guidelines. To avoid a conflict of interest or potential conflict of interest, Covered Persons must recuse themselves from all business decisions with third parties that in any way relate to the Covered Person's personal interests (financial or otherwise) or the interests of the Covered Person's family members.

Covered Persons may not engage in the following activities with a third party with whom the Covered Person has a close, personal relationship until/unless they have disclosed the relationship to their manager, and the manager has approved the Covered Person's involvement:

- Negotiating with, engaging, retaining, or hiring someone (or their company) with whom the Covered Person has a close, personal relationship or influencing decisions related to negotiating with, engaging, retaining, or hiring such individuals (or their company).
- Requesting, executing, and/or approving purchase orders for someone (or their company) with whom they have a close, personal relationship or influencing decisions related to negotiating with, engaging, retaining, or hiring such individuals (or their company).

Financial Interests

A Covered Person may not hold any financial interest in any firm or corporation that is a competitor of Amgen if such interest may influence any decision that the Covered Person might make in the performance of their Amgen responsibilities. Covered Persons, however, need not sell stock that they own in any firm or corporation that is a competitor of Amgen, unless such interest may influence any decision that Covered Persons might make in the performance of their Amgen responsibilities. Covered Persons also must comply with Amgen's Insider Trading Policy.

Other Employment and Business Activities (Applicable to Staff Members Only)

Certain types of other employment and business activities performed outside of Amgen (i.e., for a person or entity other than Amgen) present a potential Conflict of Interest. If such an engagement presents a potential Conflict of Interest, staff are required to obtain advance written consent from Amgen. Sections 3.1.5 through 3.1.9 inform staff of which employment and business activities pose a potential Conflict of Interest and therefore require advance written consent. For staff in the U.S. and Puerto Rico, refer to Human Resources Policy Guidance: Other Employment and Business Activities for procedures on how to obtain approval. Staff in other locations should contact their local HR representative.

Regardless of whether advance written consent is required, staff who participate in any outside employment or business activity must adhere to the following requirements:

- Participation in outside employment and business activities may not interfere with a staff member's regular work hours or ability to perform their job duties.
- If staff work in any capacity with an outside organization, they may not be involved in any decisions related to (1) the donation of Amgen funds or other benefits to that organization, (2) treatment guidelines, (3) formulary placement, (4) the prescribing or purchase of Amgen products, or (5) medical education or other types of education provided to that organization; however, this prohibition does not apply to non-profit entities directly sponsored or controlled by Amgen, such as the Amgen Foundation and Safety Net Foundation.

Employment or Businesses

Employment or other business engagements outside of Amgen (i.e., for a person or entity other than Amgen) pose a potential Conflict of Interest (and therefore require advance written consent to perform) if the activities relate to (1) Amgen's business or industry or (2) the staff member's position or job duties at Amgen. Other types of employment or business engagements (e.g., teaching a class unrelated to Amgen's industry or your job, such as an art class; working in the retail or food industries; selling your own arts, crafts, clothing, or jewelry; photography) generally do not pose a Conflict of Interest and therefore do not require advance written consent from Amgen.

Volunteer Activities

Volunteer activities pose a potential Conflict of Interest (and therefore require advance written consent to perform) if the activities relate to (1) Amgen's business or industry or (2) the staff member's position or job duties at Amgen. Staff should be particularly cognizant of a potential Conflict of Interest when volunteering for organizations in the healthcare community. Other volunteer activities (e.g., coaching a child's sports team; working on community fundraising initiatives) generally do not pose a Conflict of Interest and therefore do not require advance written consent from Amgen.

Board of Directors and Advisory Boards

All requests to serve on a board of directors or advisory boards with for-profit organizations require advance written consent from Amgen, specifically, the Senior Vice President (SVP) Human Resources or their delegate. Additionally, board service with not-for-profit organizations requires advance written consent from Amgen if the board service relates to (1) Amgen's business or industry or (2) the staff member's position or job duties at Amgen. Other not-for-profit board service (e.g., serving on the board of directors for a not-for-profit theatre arts organization) generally does not pose a Conflict of Interest and therefore does not require advance written consent from Amgen.

Publications

If a staff member prepares a publication as part of their job duties for Amgen, no advance written consent is required. Other sections of this Policy, however, such as restrictions on the acceptance of payments, still apply. Additionally, the requirement that publications be reviewed through the Final Publication Review (FPR) process, may apply.

If a publication is not part of a staff member's job duties for Amgen, the activity poses a potential Conflict of Interest and requires advance written consent from Amgen if it relates to (1) Amgen's business or industry or (2) the staff member's position or job duties at Amgen. Other publications

(e.g., writing a children's book) generally do not pose a Conflict of Interest and therefore do not require advance written consent from Amgen. Under such circumstances, however, staff may not refer in the publication to Amgen, Amgen's business or industry, or their position or job duties at Amgen.

Presentations

If a staff member gives a presentation (e.g., speaking engagement, lecture, expert panel, etc.) as part of their job duties for Amgen, no advance written consent is required. Other sections of this Policy, however, such as restrictions on the acceptance of payments and/or fee waivers or reductions, apply. Additionally, all such materials must be reviewed through the appropriate process, such as the Final Publication Review (FPR) process or Scientific Material Review Process, as applicable.

If a presentation is not part of a staff member's job duties for Amgen, the activity poses a potential Conflict of Interest (and therefore requires advance written consent) if it relates to (1) Amgen's business or industry or (2) the staff member's position or job duties at Amgen. Other presentations (e.g., presenting on fundraising activities by the Salvation Army) generally do not pose a Conflict of Interest and therefore do not require advance written consent from Amgen. Under such circumstances, however, staff may not refer in the presentation to Amgen, Amgen's business or industry, or their position or job duties at Amgen.

Conferences or Meetings

Staff members frequently attend non-Amgen sponsored conferences or meetings related to (1) Amgen's business or industry or (2) the staff member's position or job duties at Amgen. Before attending such conferences or meetings, staff members must obtain approval from their manager. Other approvals, such as Travel Activity and Conference (TEAC) Approval, also may apply.

Staff may not accept money or other benefits for attending a conference or meeting related to Amgen's business or industry or the staff member's position or job duties at Amgen, even if the staff member attends for reasons other than as a general attendee (i.e., as a guest speaker).

This prohibition against accepting money or other benefits does not include (1) incidental meals, if the incidental meal is generally offered to attendees by the conference or meeting host or (2) a waiver or reduction in registration or event fees, provided that if such waiver or reduction in fees is offered by an Amgen vendor (or potential vendor), it is offered to all attendees or all speakers (e.g., a free continuing education meeting.)

All other travel and related expenses for attending the conference or meeting should be borne by Amgen pursuant to Amgen's Global Travel Policy provided that attendance at the conference or meeting has been approved by the Covered Person's manager.

4. 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.

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.