

### 1. SCOPE

This Policy applies to all Amgen Inc. and subsidiary or affiliated company staff members, consultants, external workers, secondees, and temporary staff worldwide. Consultants, external workers, secondees, and temporary staff are not Amgen employees, and nothing in this Policy should be construed to the contrary. In jurisdictions that recognize “at-will” employment, this Policy does not change the at-will nature of employment at Amgen, its affiliates, or subsidiaries.

Although external workers (such as staff augmentation, project-based workers, and outsourced service providers), alliance members, external business partners, and secondees are accountable for adhering to the Standards of Business Conduct (as defined below), they are not subject to the disciplinary actions delineated in this Policy. Rather, such individuals will be held accountable for adhering to these standards without prejudice to Amgen’s contractual rights and remedies under any existing agreements. Amgen will work with any such third party to determine and implement any corrective actions necessary to respond to, and prevent recurrence of, any violation of its Standards of Business Conduct.

### 2. PURPOSE

It is Amgen’s policy to promote a culture of accountability for ethical business conduct, professional behavior, personal integrity, and adherence to acceptable business practices. Accordingly, Amgen expects compliance with: (1) its Code of Conduct and other policies, procedures, and governance documents, and (2) applicable laws and regulations including, but not limited to, those governing: (a) financial accounting, reporting, and disclosure; securities trading; interactions with government officials and members of the healthcare community; fair competition and trade practices; and price calculation and reporting; and (b) the hiring, compensation, promotion, transfer, discipline, and termination of employees, and Amgen’s relationship with consultants, external workers, and temporary staff (as generally described here and more specifically in Section 3.1).

A culture of compliance and ethical business conduct is best achieved in an environment that promotes open communication, including candid discussion of compliance concerns. This culture of compliance requires an effective process for you to raise questions or report potential violations regarding Amgen business conduct (including potential misconduct by others) without retaliation or intimidation. Managers are responsible for creating and maintaining a work environment that advances these objectives.

Another important component of this culture is the enforcement of compliance standards through appropriate disciplinary action. This Policy establishes guidelines that apply globally whenever disciplinary action is taken in response to violations of Amgen’s Standards of Business Conduct. Local or regional work rules, policies, procedures, guidance, or similar governance documents related to disciplinary action may add to the principles articulated in this Policy, but may not deviate from these guidelines, unless required by local law. Any proposed deviations from this Policy, even if legally required, need the written approval of the Chief Human Resources Officer and the Chief Compliance Officer. A record of exception approvals will be maintained by Amgen Human Resources.

### 3. POLICY

#### 3.1 You Must Comply with Amgen’s Standards of Business Conduct

#### 3.1.1 General Principles

You are required to adhere to Amgen's Standards of Business Conduct. Those requirements include, but are not limited to:

- engaging in conduct toward customers, government employees, vendors, and others that is in accordance with professional norms
- engaging in conduct that promotes a professional environment
- adhering to accepted industry standards for specific professions (e.g., attorneys and accountants) when functioning as such a professional for Amgen
- detecting, preventing, and reporting known, reasonably suspected, or potential violations of Amgen's Standards of Business Conduct, or other serious wrongdoing or unethical conduct, including conduct inconsistent with the Amgen Values
- cooperating fully with an investigation into a possible violation of Amgen's Standards of Business Conduct (including making yourself available to investigators immediately as practicable upon request and providing complete and accurate information, including documents, recordings, other tangible information, and access to Amgen-issued electronic devices)
- cooperating fully with Amgen and its outside counsel in defending and prosecuting litigation on Amgen's behalf (including providing complete and truthful testimony and completely and truthfully responding to company requests for documents and other information)

#### 3.1.2 Amgen's Additional Expectations of Managers

In addition to adhering to Amgen's Standards of Business Conduct, all managers must:

- ensure their staff know and follow Amgen's Standards of Business Conduct applicable to their activities and timely complete required training
- promote compliance with and prevent violations of Amgen's Standards of Business Conduct
- create a culture that encourages staff to prevent problems, raise concerns, and report issues

#### 3.1.3 Asking Questions About Compliance Requirements

You are encouraged to ask questions about Amgen's policies, procedures, and practices, especially if you are unsure whether an action, activity, or decision is consistent with Amgen's Standards of Business Conduct or good business ethics in line with the Amgen Values. Section 4.0 "Questions and Reporting Violations" identifies some of the available resources to help you answer such questions.

#### 3.1.4 Reporting Possible Compliance Violations

Generally, matters that must be reported include good-faith concerns regarding compliance issues or misconduct, including, but not limited to:

- violations of law or regulation
- violations of Amgen's Code of Conduct, policy, or other governance documents, particularly those regarding financial disclosures, accounting, accounting controls, and auditing matters
- any other serious wrongdoing or unethical conduct, including conduct that is inconsistent with the Amgen Values

If you detect a possible violation of Amgen's Standards of Business Conduct, Section 4.0 of this Policy and Amgen's Code of Conduct identify many options to report it (including the Business Conduct Hotline). Amgen takes all calls to the Business Conduct Hotline seriously, including determining whether investigation or remedial action is necessary.

In the U.S. and most other locations, 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. Consult the dialing instructions for country-specific rules.

When you call the Business Conduct Hotline, you will be asked to provide details of the incident or issue being reported. To thoroughly investigate a report and facilitate follow-up questions, Amgen may need to ask you to disclose your identity, to authorize the disclosure of your identity (or information that could result in your identification) to others, and/or provide additional information regarding the incident or issue being reported. If you decide not to provide such information, Amgen might not be able to investigate the matter fully and/or take remedial action.

Nothing in this Policy prohibits you 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.

### **3.1.5 Prohibition Against Retaliation**

This Policy prohibits any form of retaliation against or intimidation of anyone for their good faith:

- reporting of a compliance concern
- objection to conduct that may constitute a compliance concern
- participation in any investigation or other proceeding related to a potential compliance concern
- engagement in any other conduct that may be considered protected activity under applicable law or regulation,

even if Amgen 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.

If you retaliate against or intimidate anyone in violation of this Policy, you will be subject to disciplinary action, up to and including termination, to the extent permitted by local laws. Retaliation against another person for reporting actual or potential violations of law or regulation, participating in an investigation or other related proceeding, or for any other act that may constitute protected activity may also subject you to criminal and/or civil liability under U.S. federal and state laws and the laws of other countries.

### 3.2 Disciplinary Actions May Be Imposed for Violations of Amgen's Standards of Business Conduct

Failure to adhere to Amgen's Standards of Business Conduct may lead to disciplinary action, up to and including termination of employment, to the extent permitted by local laws. Examples of actions or omissions that may result in disciplinary action include, but are not limited to:

- authorizing or participating in a violation of, or requesting or directing another person to violate Amgen's Standards of Business Conduct, including, but not limited to:
  - offensive conduct toward customers, government employees, vendors, or others
  - failure to adhere to accepted industry standards for specific professions (e.g., attorneys and accountants) when functioning as such a professional for Amgen
  - conduct that fails to promote a professional environment
  - discrimination in any phase of the employment relationship on the basis of any legally-protected attribute, status, or characteristic, including, but not limited to: race, color, national origin, ethnicity, gender, gender identity, sexual orientation, religion, age, marital status, disability, and disabled veteran or veteran of war
  - harassment of any kind, including sexual harassment
  - intimidation or retaliation
- negligently failing to detect or prevent a violation of Amgen's Standards of Business Conduct
- failing to timely report a known, reasonably suspected, or potential violation of Amgen's Standards of Business Conduct or other serious wrongdoing or unethical conduct, including conduct inconsistent with the Amgen Values
- failing to cooperate fully with an investigation into a possible violation of Amgen's Standards of Business Conduct
- retaliating against anyone for (1) reporting a possible violation of Amgen's Standards of Business Conduct, (2) preventing or opposing conduct in violation of Amgen's Standards of Business Conduct, or (3) cooperating in an investigation regarding such possible violations
- making a knowingly false or bad-faith accusation involving an alleged violation of Amgen's Standards of Business Conduct
- (for managers) failing to fulfill the managerial responsibilities described in this Policy

It is Amgen's practice to conduct an inquiry into an alleged violation of its Standards of Business Conduct in accordance with local procedures and applicable laws. To the extent permitted by applicable laws, Amgen reserves the right to take whatever disciplinary and other measures it determines in its sole discretion to be appropriate in any situation, including, but not limited to:

- feedback or coaching
- assignment of required additional training
- oral or written warning
- suspension with or without pay
- removal of job duties/responsibilities
- job re-level
- lower performance rating
- impact to compensation or other incentives
- termination of employment and/or
- disclosure of the wrongdoing to a government agency or other appropriate reporting authority

Decisions regarding disciplinary actions are made by Amgen on a case-by-case basis after considering all facts and circumstances. You are subject to disciplinary actions regardless of your position, title, or tenure with the company. Factors that may potentially affect Amgen's determination of disciplinary action, include, but are not limited to:

- the seriousness of the violation(s)
- the individual's employment history, including past adherence to Amgen's Standards of Business Conduct
- the individual's level of authority (i.e., the higher the position of authority, the more serious the consequences may be)
- the individual's self-reporting and/or cooperation throughout the investigation or review process leading up to the decision on disciplinary action and
- (for managers) the extent to which the manager directed, approved, or failed to take reasonable steps to detect or prevent violations of Amgen's Standards of Business Conduct or demonstrated responsibility and accountability for such violations