Amgen Supplier Code of Conduct

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Amgen understands that it is a privilege to be among the world's greatest innovators focused on serving patients with serious diseases. This privilege is not something Amgen accomplishes alone, but with the help of third-party individuals and organizations Amgen engages who share its commitment to act in an ethically, socially, and environmentally responsible manner.

To reinforce the high standards that guide both Amgen and its Suppliers, Amgen has established this Supplier Code of Conduct. The Code reflects Amgen's commitment to advancing science and innovation responsibly while "doing the right thing" and to upholding the Amgen Values of being ethical, trusting and respecting each other, ensuring quality, and being science-based. Central to these principles is the expectation that Suppliers operate in full compliance with all applicable laws, rules, and regulations.

Without limiting the generality of the above or other requirements in agreements with Amgen, Amgen expects each of its Suppliers to operate in an ethical manner and in compliance with this Supplier Code of Conduct, which sets forth the basic principles for Suppliers Amgen engages. The principles outlined in the Supplier Code of Conduct are considered during the supplier selection process as well as throughout the duration of the business engagement.

Amgen expects Suppliers to firmly adhere to contractual obligations and ethical principles for labor, health and safety, environment, management systems, use of Artificial Intelligence, and supply transparency. Further, Amgen expects Suppliers to determine how to meet, demonstrate, and integrate in their conduct compliance with all applicable laws, rules, regulations, and Supplier Code of Conduct principles. To continue supporting its ability to serve patients, Amgen expects Suppliers to apply the Supplier Code of Conduct principles into continuous improvement efforts that are aimed at advancing performance over time.

Table of Contents

CHAPTER 1: ETHICS 4

Kickbacks, Bribery, and Corruption 5
Fair and Independent Competition 5
Opportunities for Small Businesses 5
Ethical Animal Use 5
Accuracy of Financial and Business Records 5
Product Quality 6
Clinical Trials 6
Use of Technology and Artificial Intelligence 6
Safeguarding Information 6
Conflict of Interest 7
Insider Trading 7
Trade Regulations 7
Honest Communications 7
Responsible Sourcing of Minerals (Conflict Minerals) 7

CHAPTER 2: HUMAN RIGHTS AND LABOR 8

Freely Chosen Employment 9
Child Labor and Young Workers 9
Non-Discrimination 9
Fair Treatment 9
Wages, Benefits, and Working Hours 9
Freedom of Association 9
Local Communities 9

CHAPTER 3: HEALTH AND SAFETY 10

Worker Protection and Safety 11
Process Safety 11
Emergency Preparedness and Response 11
Hazard Information 11

CHAPTER 4: ENVIRONMENT 12

Environmental Authorizations 13
Climate Change, Waste, and Emissions 13
Resource Efficiency and Circularity 13
Biodiversity Conservation 13
Spills and Releases 13

CHAPTER 5: MANAGEMENT SYSTEMS 14

Commitment and Accountability 15
Risk Management 15
Identification and Reporting of Concerns 15
Records Management 15
Training and Competency 16
Business Continuity 16
Continual Improvement 16
Effective Communication 16
Legal and Customer Requirements 16
Supply Transparency 16
Supply Chain Security 16

Chapter 1: Ethics

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Amgen expects Suppliers to conduct their business in an ethical manner and act with integrity. This principle is supported by the following elements:

Kickbacks, Bribery, and Corruption

All forms of bribery and corruption are strictly prohibited. Suppliers must not, directly or indirectly, offer, promise, authorize, give, solicit, or accept anything of value to improperly influence any act or decision, secure an improper advantage, or induce any person to act inconsistently with their lawful or professional duties.

This prohibition applies to interactions with Government Officials, healthcare professionals, private individuals, and commercial entities, whether conducted directly or through third parties. "Government Official" includes any officer or employee of a government, government-owned or government-controlled entity (including public hospitals and universities), public international organization, political party, or candidate for political office.

Facilitation payments, kickbacks, and improper rebates are prohibited, regardless of local custom.

Suppliers must maintain effective, risk-based internal controls designed to prevent, detect, and address corruption risks. At a minimum, Suppliers must:

- Maintain accurate and complete books and records that fairly reflect all transactions and expenditures;
- Implement appropriate financial and accounting controls;
- Conduct risk-based due diligence on third parties engaged to act on their behalf;
- Provide periodic anti-corruption training to relevant personnel; and
- Maintain mechanisms for reporting suspected misconduct without retaliation.

Suppliers are responsible for ensuring that any third parties acting on their behalf in connection with Amgen business comply with applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other applicable local laws and regulations.

Upon request, Suppliers must provide reasonable cooperation and documentation demonstrating compliance with these requirements.

Fair and Independent Competition

Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable antitrust and competition laws. Suppliers shall employ fair business practices including accurate and truthful advertising. Suppliers are not to use our name (or that of our affiliates or products) in publicity or advertising without our prior written consent.

Opportunities for Small Businesses

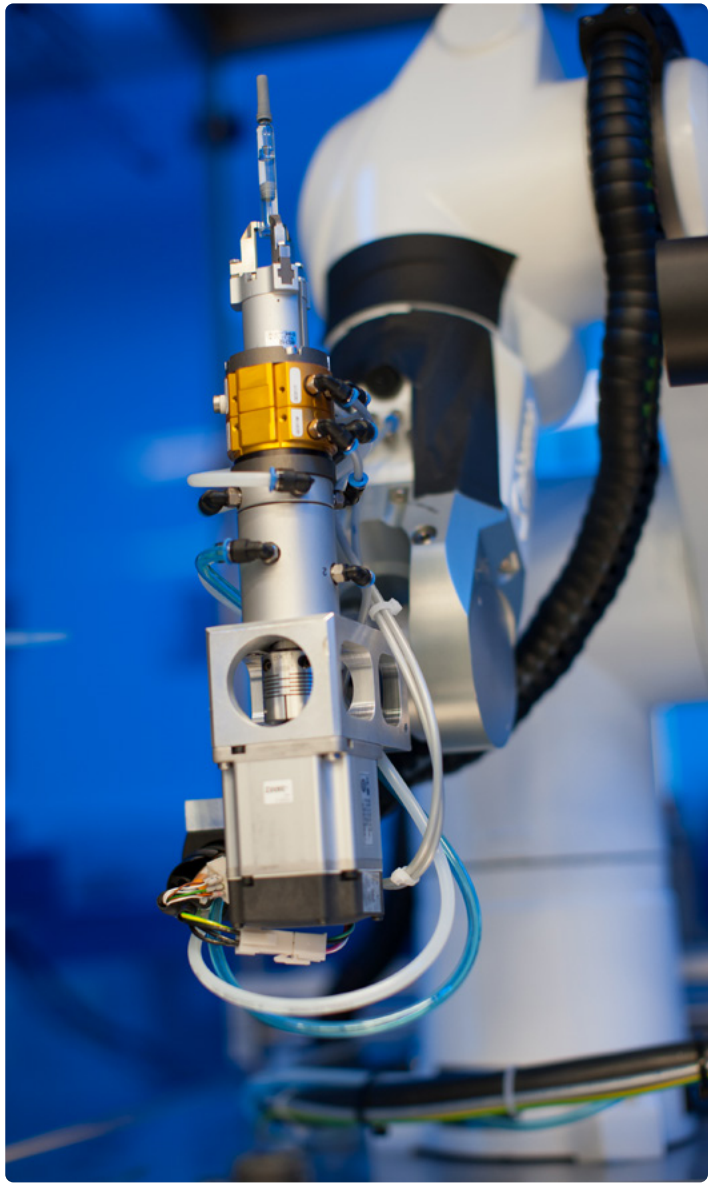
Suppliers shall identify and provide opportunities for small businesses in connection with supplying useful goods and services to Amgen at competitive prices.

Ethical Animal Use

Suppliers shall uphold the highest standards of ethical and responsible use of animals in research. This includes treating animals humanely, minimizing pain and distress, and considering scientifically validated alternatives when acceptable to regulatory authorities and without compromising patient safety. Suppliers are expected to follow the principles of Replacement, Reduction, and Refinement (3Rs) and may be asked to provide documentation or certifications to demonstrate compliance. To learn more, please visit **Amgen's Commitment to Ethical and Responsible Use of Animals in Research**.

Accuracy of Financial and Business Records

Suppliers must maintain all financial books and records in conformance with Generally Accepted Accounting Principles (GAAP). Business records must be accurate in all material respects. Business and financial records must be legible, transparent, and reflect actual transactions and payments.



Product Quality

Suppliers and service providers involved in the supply, manufacturing, packaging, testing, storage, and distribution of materials and/or products or involved in clinical trials on Amgen's behalf will ensure compliance with applicable Quality regulations and Good Manufacturing Practice, Good Clinical Practice, Good Distribution Practice, and Good Laboratory Practice requirements for the markets in which the products or services are registered, conducted, or distributed.

Clinical Trials

When engaged in clinical trials on Amgen's behalf, Suppliers must conduct such clinical trials in accordance with the global standards of Good Clinical Practices and applicable local regulatory requirements and follow ethical principles.

Use of Technology and Artificial Intelligence

Suppliers must uphold principles of ethical and responsible use of technology, including Artificial Intelligence (AI). This includes ensuring that AI systems are developed and used in a manner that respects human rights, avoids discrimination or bias, protects privacy and data security, and complies with applicable laws and regulations. Suppliers shall adhere to internationally recognized principles for the use of AI technologies, such as the Organization for Economic Co-operation and Development (OECD) Principles on Artificial Intelligence.

Suppliers shall not use Amgen's Confidential Information with any generative AI software without Amgen's consent. Notwithstanding the foregoing, Suppliers may only use or employ Amgen Confidential Information within an internal, secure, access-restricted, nonpublic instance of an AI tool that is dedicated solely to the Supplier, subject to Supplier's compliance with the confidentiality, security, and nonuse obligations and provided that Company Confidential Information is not used to train, fine-tune, improve, or otherwise enhance any AI tool.

Safeguarding Information

Suppliers shall respect Amgen's intellectual property rights and protect all Confidential Information, including personal information disclosed to or collected from or on behalf of Amgen. Suppliers shall take all necessary technical, procedural, and administrative safeguards, including industry-standard cybersecurity measures, to prevent Amgen's intellectual property, confidential, and proprietary information from unauthorized disclosure, misuse, theft, improper access, and disclosure or alteration, including unauthorized communication and/or publication of information acquired from or on behalf of Amgen.

Any unauthorized access, use, disclosure, or loss (including theft) of Amgen confidential, proprietary, or other information must be immediately reported by Supplier to Amgen's Cybersecurity Operations Center (csoc@amgen.com).

Conflict of Interest

Suppliers shall avoid situations that create or appear to create a conflict of interest in their dealings with Amgen. Suppliers shall not offer Amgen employees (including family members or others who may have a close or personal relationship with Amgen employees) or representatives of anything of value, including money, loans, credits, or discounts, gifts, entertainment, favors, products, or services, that could influence a business decision.

Suppliers must promptly disclose any actual or potential conflicts of interest to Amgen so that appropriate steps can be taken to mitigate or eliminate such conflicts. Transparency and proactive disclosure are key expectations in maintaining trust and integrity in our business relationships.

Insider Trading

Suppliers must adhere to all applicable laws and regulations governing insider trading. This includes insider trading laws and regulations of the United States and those of other countries where the Supplier is located or conducts business. Suppliers should maintain and enforce policies that explicitly prohibit any form of insider trading within their own organization.

Trade Regulations

Suppliers must comply with all applicable import and export control laws, economic sanctions, embargoes, anti-boycott laws, and other trade compliance laws and regulations of the United States and of any country where such transactions occur.

Honest Communications

Suppliers shall be honest and accurate in discussions with our company, our customers, our business partners, and regulatory agency representatives and Government Officials. Suppliers must not make any false representations or engage in other misleading or deceptive conduct in relation to any company engagement, product, service, or transaction.

Responsible Sourcing of Minerals (Conflict Minerals)

Conflict Minerals refer to minerals sourced from regions or countries where their extraction and trade contribute to armed conflict, human rights abuses, or environmental damage. Suppliers are expected to source minerals used in their products or supply chain, such as tantalum, tin, tungsten, and gold, from responsible and sustainable supply chains, ensuring they are not procured from conflict-affected or high-risk areas unless validated as conflict-free through recognized audit or certification programs or are derived entirely from recycled or scrap sources.

Chapter 2: Human Rights and Labor

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Suppliers shall be committed to upholding the human rights of their workers and treating them with dignity and respect. Suppliers shall support the protection of internationally proclaimed human rights and ensure that they are not complicit in any abuses of human rights. This principle is supported by the following elements:

Freely Chosen Employment

Suppliers shall not use forced, bonded, involuntary, slave, or indentured labor or involuntary prison labor.

Child Labor and Young Workers

Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment or the age established for completing compulsory education.

Non-Discrimination

Suppliers should engage in appropriate action to further Amgen's commitment to non-discrimination and equal employment opportunities, including programs to implement Amgen's Equal Employment Opportunity Policy, which is available for review. Suppliers shall provide a workplace free of harassment and discrimination and comply with all applicable laws and regulations. Suppliers shall not discriminate for reasons such as race, color, age, sex (including pregnancy, childbirth, or related medical conditions), sexual orientation, gender identity, national origin, physical or mental disability, genetic information, religion, political affiliation, union membership, or veteran or marital status.

Fair Treatment

Suppliers shall provide a workplace free of actual or threatened harsh and inhumane treatment, including any sexual or other harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers.

Wages, Benefits, and Working Hours

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours, and mandated benefits. Suppliers shall, in a timely manner, communicate with workers the basis on which they are being compensated. Suppliers are also expected to communicate with workers whether overtime is required and the wages to be paid for such overtime.

Freedom of Association

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation, and join works councils. Workers shall be able to communicate openly with management regarding working conditions without retaliation, threat of reprisal, intimidation, or harassment.

Local Communities

Suppliers shall respect the rights of the local communities around their sites, including the right to a clean and healthy environment.

Chapter 3:

Health and Safety

Chapter 3: Health and Safety

Suppliers shall provide a safe and healthy working environment, including in any company-provided living quarters. This principle is supported by the following elements:

Worker Protection and Safety

In both the workplace and any company-provided living quarters, Suppliers shall protect workers from overexposure to chemical, biological, or physical hazards, and physically demanding tasks. Suppliers shall operate in compliance with all applicable health and safety regulations and ensure safety management systems are in place to prevent work-related injuries.

Process Safety

Suppliers shall ensure workers have the required knowledge, competence, and training for the tasks they perform. Suppliers shall prevent or mitigate incidents associated with operations and processes that could result in catastrophic impact on people or the environment, on- and off-site. Suppliers' actions shall be commensurate with the risks associated with the potential impact.

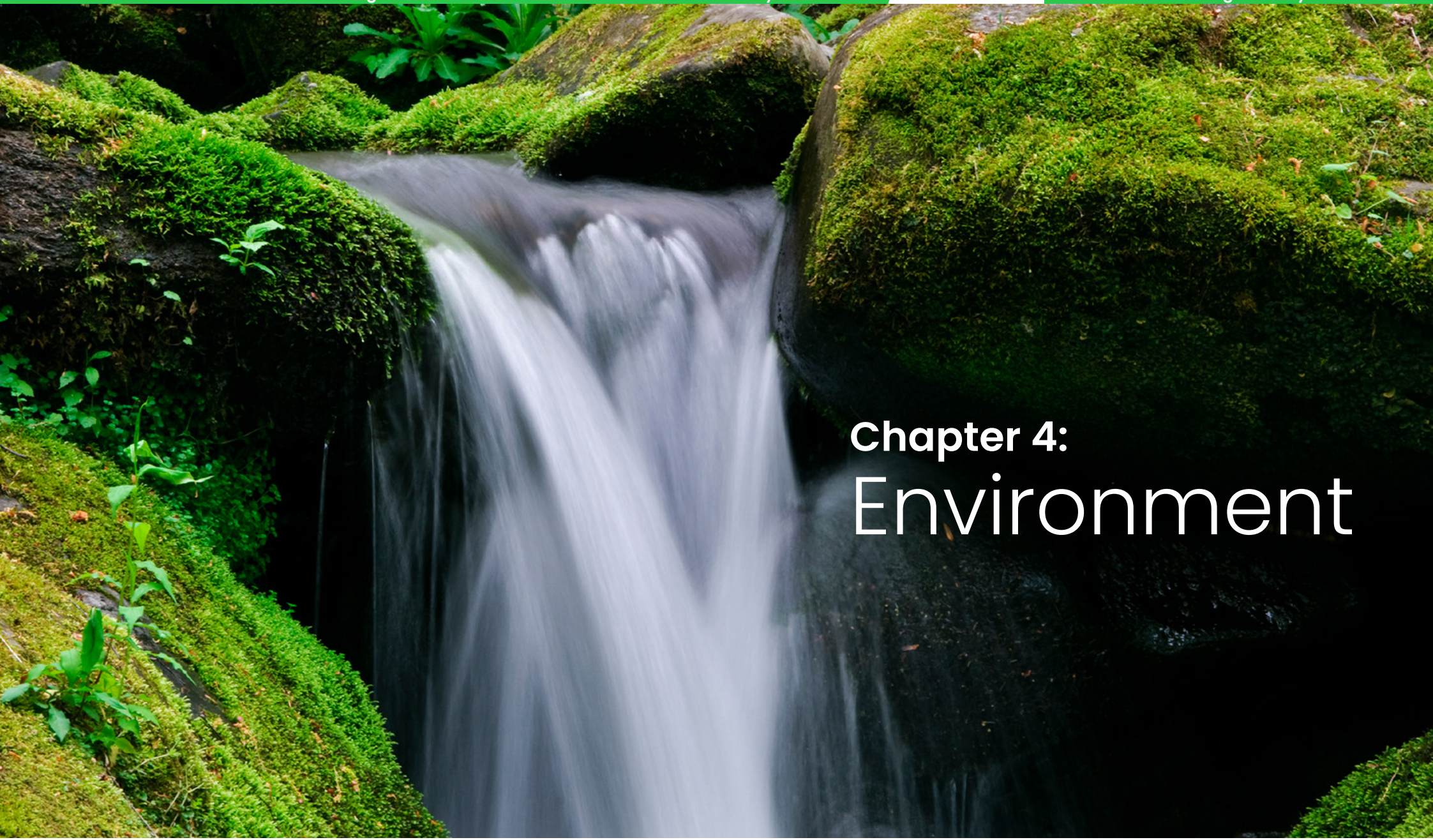
Emergency Preparedness and Response

Suppliers shall identify and assess emergency situations in the workplace and any company-provided living quarters and minimize their impact by implementing emergency plans and response procedures. Suppliers shall review and, if appropriate, update such plans and procedures annually, or more frequently, if necessary.

Hazard Information

Current safety data sheets and information relating to hazardous materials – including but not limited to pharmaceutical intermediate materials – shall be available to educate, train, and protect workers from hazards.

Suppliers shall notify Amgen's Environmental Health Safety (EHS@Amgen.com) of any recordable injury/illness, serious near miss, or environmental release within 24 hours, investigate to determine root cause, implement corrective and preventive actions (CAPA) as appropriate, and share learnings.



Chapter 4: Environment

Chapter 4: Environment

Suppliers shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment and support continuous improvement in environmental performance. Suppliers are encouraged to conserve natural resources, to engage in reuse and recycling programs, and, where possible, to avoid the use of hazardous materials. This principle is supported by the following elements:

Environmental Authorizations

Suppliers shall comply with all applicable environmental regulations, laws, codes, and other governmental requirements and authorizations. All required environmental permits, licenses, information registrations, and restrictions shall be obtained, and their operational and reporting requirements followed.

Climate Change, Waste, and Emissions

Suppliers shall monitor and work to reduce their greenhouse gas (GHG) emissions and support their Suppliers to do the same, including responding to data requests for relevant environmental data to support Amgen's environmental sustainability initiatives. Suppliers shall ensure safe handling, movement, storage, recycling, reuse, or management of waste, air, emissions, and wastewater discharges. Prior to the release into the environment of any waste, wastewater, or emissions, Suppliers must appropriately manage, control, and treat potential adverse impacts to human or environmental health.

Resource Efficiency and Circularity

Suppliers shall design out waste, improve efficiency, and reduce consumption of resources, including water, favor renewable/sustainable sources, and maximize reuse and recycling.

Biodiversity Conservation

Suppliers shall understand and mitigate their biodiversity impacts and avoid activities that degrade critical habitats.

Spills and Releases

Suppliers shall prevent spills and releases and maintain response plans, materials, and trained personnel to respond to and mitigate any accidental events.

Chapter 5:

Management Systems

Chapter 5: Management Systems

Suppliers shall facilitate continual improvement and compliance with the expectations of this Supplier Code of Conduct. This principle is supported by the following elements:

Commitment and Accountability

Suppliers shall demonstrate commitment to the principles contained herein by allocating appropriate resources including but not limited to training, communication, policy, operating procedures, and monitoring that help establish clear accountability structures. Suppliers' senior management must oversee compliance with these requirements and ensure that policies, procedures, and controls are implemented effectively throughout the organization.

Suppliers are expected to integrate these principles into their business strategies and operations, promoting continuous improvement in ethical and responsible conduct.

Risk Management

Suppliers shall identify, assess, and manage risks in all areas addressed by these principles. Risk management systems should extend to Suppliers' own third parties and business partners. Suppliers should adopt a proactive, risk-based approach that includes regular risk assessments, Supplier continuity, due diligence, mitigation actions, and monitoring of the effectiveness of these measures.

Identification and Reporting of Concerns

Suppliers shall maintain an environment in which all workers are encouraged to report concerns or illegal activities without fear of retaliation, intimidation, or harassment. Suppliers must have mechanisms for confidential and, where legally permissible, anonymous reporting and investigation of such concerns. Amgen encourages Suppliers and their workers to report issues or suspected misconduct directly through **Amgen Business Conduct Hotline** or other designated reporting channels. Upon identification of issues that impact provision of services or supply, Suppliers shall notify Amgen, investigate the reported issue(s), identify root cause, and promptly take corrective action where necessary to address identified concerns.

Records Management

Suppliers shall maintain accurate, complete, reliable, and auditable records, including electronically stored information, sufficient to demonstrate compliance with applicable laws, regulations, standards, and Amgen's requirements. Records must be maintained in a manner that preserves their integrity and accessibility, retained in accordance with legal and contractual obligations, including for an appropriate period consistent with **Amgen's Record Retention Schedule** and not destroyed or altered where litigation, investigation, audit, or other legal hold obligations are known or reasonably anticipated. Upon reasonable request and subject to applicable laws and confidentiality obligations, Suppliers shall make relevant records available to Amgen in a reasonably usable format and cooperate fully during audits, assessments, investigations, or compliance reviews.

Training and Competency

Suppliers shall train their workers to achieve an appropriate level of knowledge, skill, and ability to manage and address the expectations set forth herein.

Business Continuity

Suppliers are responsible for developing and implementing appropriate business continuity plans for all operations supporting Amgen's business. Suppliers shall inform Amgen of financial, economic, supply, geopolitical changes, or other material conditions that affect or might affect the ability to supply Amgen or Amgen's ongoing operations or operating decisions.

Continual Improvement

Suppliers and service providers are expected to continually improve by setting performance objectives, executing implementation plans, and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, or management reviews.

Effective Communication

Suppliers shall establish and maintain effective systems to communicate these principles to relevant stakeholders, including their workers, contractors, and suppliers. Suppliers are expected to provide periodic training and awareness programs to ensure that employees and partners understand and adhere to these standards. Suppliers should regularly evaluate the effectiveness of their communication and training programs and make improvements, as needed.

Legal and Customer Requirements

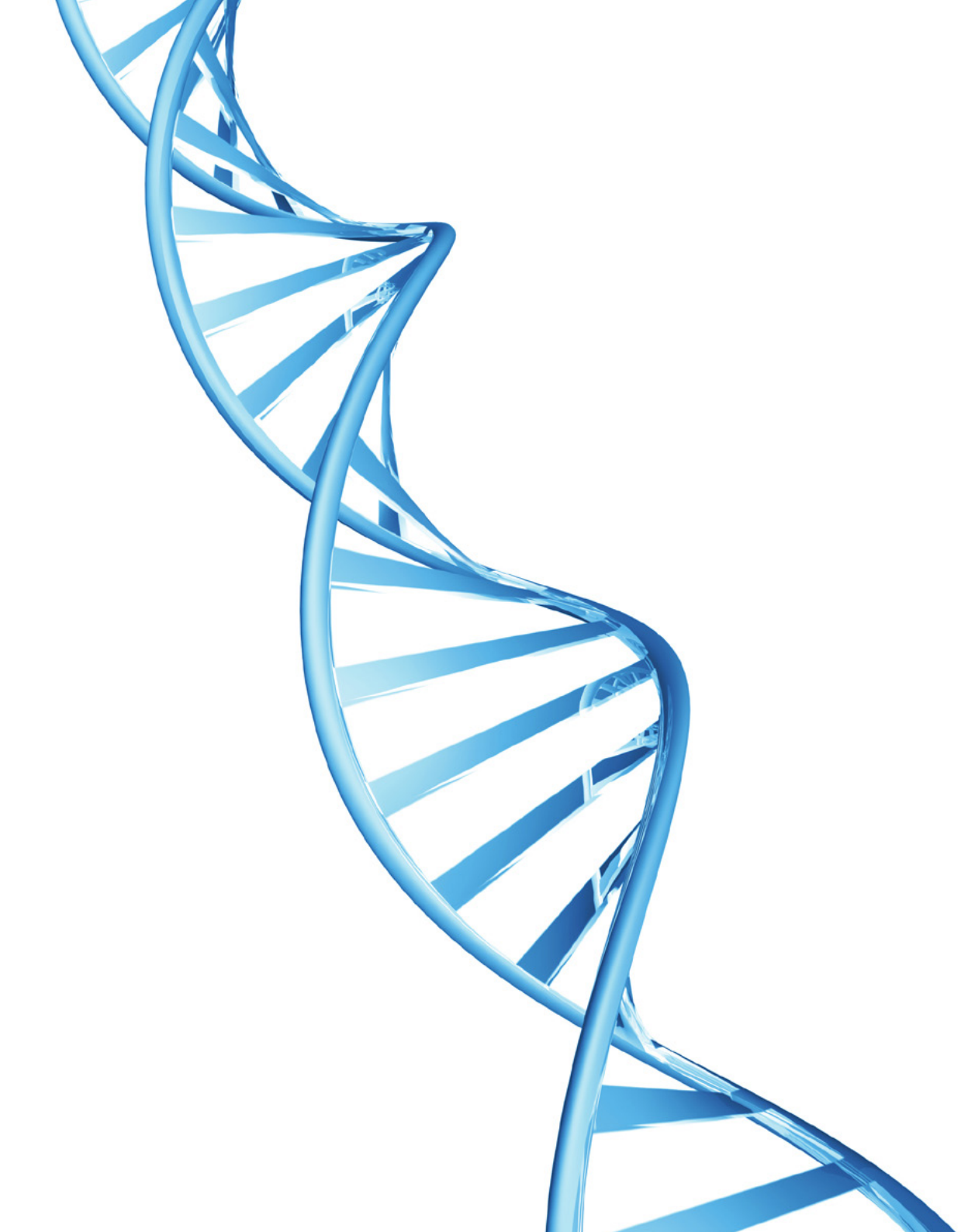
Suppliers shall identify and comply with applicable laws, regulations, standards, and relevant customer requirements. We have the right to audit our key Suppliers, and we conduct or use third parties to conduct audits of Suppliers to assess compliance with this expectation. If we determine that a Supplier has failed to meet these expectations, we may take action with respect to that Supplier, including requiring corrective actions or canceling outstanding orders. We have not required independent certifications of compliance but typically have the right to obtain documentary evidence of compliance upon request.

Supply Transparency

Suppliers shall exercise due diligence regarding their supply chain to support Amgen's compliance with manufacturing practices, regulatory requirements, regulatory agency expectations, disclosure responsibilities and policies, and our other legitimate business purposes.

Supply Chain Security

Amgen maintains membership in supply chain security programs administered by Customs Authorities in the United States (Customs-Trade Partnership Against Terrorism) and the European Union (Authorized Economic Operator). These programs require Amgen and their supply chain partners to meet or exceed acceptable warehouse, transportation, and cargo security standards. Suppliers and supply chain partners may be subject to audit for the purpose of validating Amgen's supply chain security profile.



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Our Values in Action

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