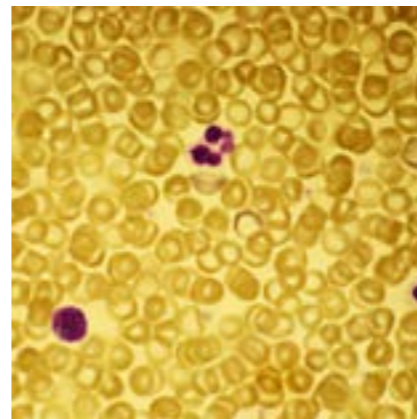
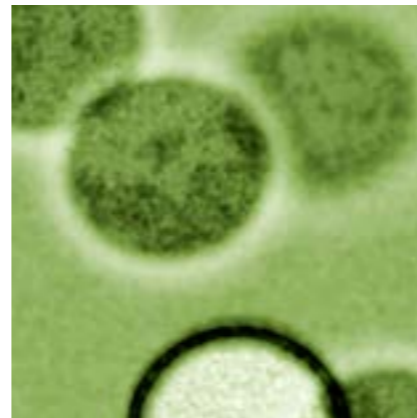
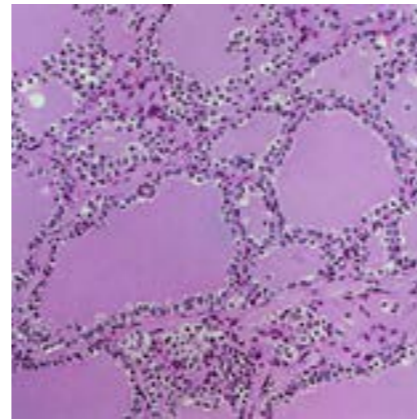
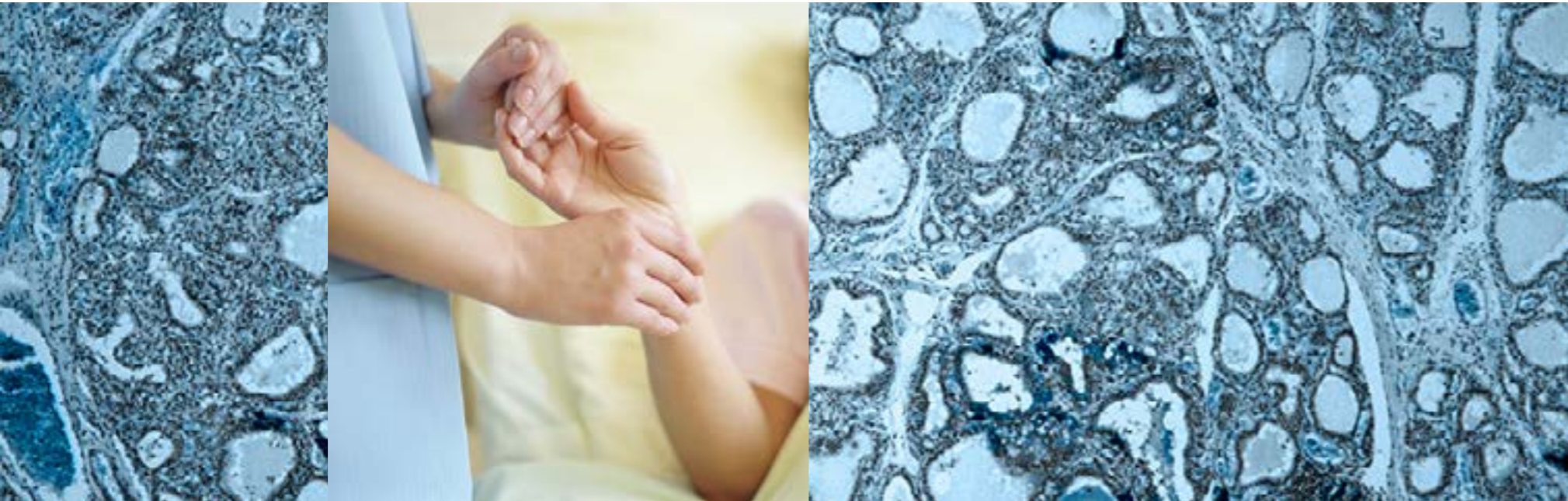


Code of Conduct



Our Mission

To serve patients



Our Aspiration

We aspire to be the best human therapeutics company. We will live the Amgen Values and use science and innovation to dramatically improve people's lives.

Our Leadership Attributes

- ◆ Shapes Amgen's Future
- ◆ Develops Best Team
- ◆ Delivers Results

The Amgen Values

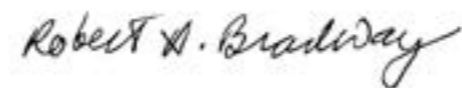
- ◆ Be Science-Based
- ◆ Compete Intensely and Win
- ◆ Create Value for Patients, Staff, and Stockholders
- ◆ Be Ethical
- ◆ Trust and Respect Each Other
- ◆ Ensure Quality
- ◆ Work in Teams
- ◆ Collaborate, Communicate, and Be Accountable

A Message From Our CEO

As a values-based company, Amgen expects all staff to behave in a responsible and principled way. Compliance is embedded in our culture and supports our mission to serve patients. It's absolutely critical that as Amgen staff members we know, understand, and unwaveringly follow the policies that are fundamental to the proper practice of our business. There are no shortcuts in compliance.

This book will help you understand what Amgen expects of you and what our customers and stakeholders expect of us. It's not an exhaustive list of every policy you may need to know in your particular role, but it's a good roadmap and, if you have further questions, it directs you to additional resources. Our social architecture – the Amgen Values, our Leadership Attributes, our aspiration, and our mission – and this Code of Conduct provide the best guidance for our decisions and actions.

Please read this book carefully. I think you will come away with a heightened appreciation of the value of ethical conduct and full compliance. Doing the right thing for the right reasons is the only way to earn and keep the confidence and trust of our partners, customers, the public, and patients we serve.



Robert A. Bradway
Chairman and Chief Executive Officer
Amgen

Table of Contents



Amgen reserves the right, in its sole discretion, to modify any aspects of the compliance program, including, without limitation, this book and company policies, at any time, for any reason, and with or without notice. If there is a conflict between this book and a specific policy, the policy currently in effect will govern.

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Understanding Our Code



Introduction

Your Responsibilities

Additional Responsibilities
of Managers

Disciplinary Actions

Introduction

At the end of the day all of us want to be proud of the work we do at Amgen, knowing that we have done our part to improve lives and to earn and maintain our reputation for high ethical standards. But in today's complex, global business world, no company can assume that the right course of action is always clear, nor can it take for granted the continued goodwill of others. Even companies with great reputations must invest in protecting that reputation. To help us Do The Right Thing, we have developed this Code of Conduct.

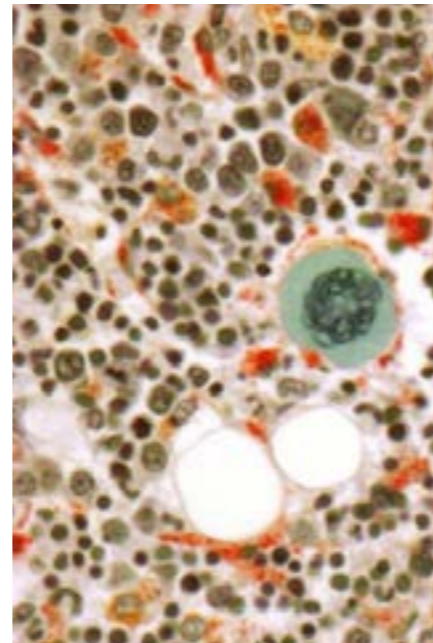
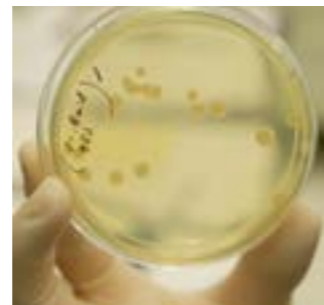
Doing the right thing is not always easy. Ethical behavior goes beyond compliance with the laws. One of the attributes that sets Amgen apart is that we do the right things, in the right ways. At times, we might sacrifice some immediate advantage, but in the long run, when we adhere to high ethical standards, we benefit our patients, our customers, our fellow staff members, and our stockholders.

Please read this Code of Conduct and keep it handy for your reference. This book answers some of the important questions about our conduct; the Amgen Values and your own good judgment answer the rest.

Scope

Every person conducting business for Amgen worldwide must follow and employ reasonable steps in preventing violations of this Code of Conduct, together with all applicable laws and company policies. This includes all staff and levels of management as well as consultants, external workers, secondees, and temporary workers.

This Code of Conduct also applies to all of Amgen's locations, affiliates, and subsidiaries. In some countries, due to local laws or business requirements, the policies discussed here may be supplemented by additional policies or standards to address local requirements.



Important Note — Whenever the Code talks about laws, this includes regulations, too. Similarly, when you see a reference to Amgen's policies in this Code, it includes Amgen's written policies, standards, procedures, and other governance documents.

Your Responsibilities

One of your responsibilities is to follow the law and Amgen policies as you conduct business on behalf of Amgen. While this Code of Conduct has been written to familiarize you with many of the policies that apply at Amgen, it does not supersede them or act as a substitute for reading each policy that applies to your specific job. We all need to understand the policies that apply to our work and our roles. Check with your function and your manager to learn about job-specific information that you need to know.

Remember, no written policy or code on its own can guarantee compliance with the law or ethical decision-making. Each of us must do our part. Here are just a few ways you can Do The Right Thing.

Act with honesty and integrity

- Conduct business with honesty, integrity, and in a manner that protects Amgen’s public image and reputation.

Follow the rules

- Follow the law and Amgen policies as you conduct company business.

Respect others

- Respect fellow staff members, government officials, our business partners, and our competitors.

Ask

- If you are unsure about what to do or have questions about law, policy, ethics or other compliance issues, ask your manager or consult the resources identified by this Code.

Report violations

- Promptly report all known or suspected violations of law, this Code or company policies through the appropriate channels. If someone asks you or pressures you to do something that might be a violation, report that also.

Cooperate with investigations and litigation

- Fully cooperate with company investigations into potential violations and with Amgen’s defense or prosecution of litigation. This includes but is not limited to being forthcoming and telling the truth.

Disclose

- Immediately disclose to the Business Conduct Hotline if you currently are on an Exclusion List or otherwise ineligible to participate in the federal health care programs or in federal procurement or non-procurement programs; or have been convicted of a criminal offense that would lead to you being on an Exclusion List.

“Exclusion Lists” mean:

- the U.S. Food and Drug Administration (FDA) Debarment List (Drug Product Applications),
- the U.S. Department of Health and Human Services (HHS)/ Office of Inspector General (OIG) List of Excluded Individuals/ Entities, or
- the U.S. General Services Administration (GSA) Excluded Parties Listing System.

Learn more by reviewing the Business Conduct, Reporting, and Non-Retaliation Policy and General Business Conduct Policy.

Additional Responsibilities of Managers



If you are a manager, you have additional responsibilities. You must take steps to promote compliance and prevent violations in the areas you manage.

Lead by example. You must serve as a positive role model and encourage others to follow this Code and Amgen policies. What you do encourages others to do the same thing. Here are some specific ways you, as a manager, can fulfill these obligations.

- ◆ Foster a culture of compliance and ethics through personal leadership.
- ◆ Demonstrate the highest ethical standards and quality in your work every day and expect the same from the people who report to you.
- ◆ Compete intensely, but never give others the impression that it is acceptable to ignore our policies or skip steps. Do not create or tolerate an environment where staff members feel pressured to bend rules.
- ◆ Guide staff, consultants, external workers, secondees, and temporary staff.
- ◆ Ensure that your direct reports complete all corporate and job-specific compliance training. On a regular basis, review with your direct reports the policies that apply to them.
- ◆ Make sure vendors, consultants, external workers, secondees, and temporary staff working in your area act in a manner consistent with this Code and policies that apply to them.
- ◆ Prevent and report problems.
- ◆ Be proactive and take steps to prevent problems before they happen; do not condone them when they do.
- ◆ Respond to staff members who raise concerns in a way that makes them feel secure and at ease sharing their issues.
- ◆ Be responsible for reporting violations you suspect or that others (not just your direct reports) share with you.



Disciplinary Actions

Failure to comply with the Code, Amgen policies, or applicable law will subject staff to disciplinary action up to and including termination of employment, to the extent permitted by local laws. Disciplinary action may also be taken when managers ignore misconduct or fail to correct it. Managers must also ensure their teams are educated on the standards of business conduct, promote compliance, prevent violations, supervise and guide subordinates regarding standards, and create a culture that encourages staff to voice their concerns. In addition, Amgen may terminate the services or work engagement of non-employees who fail to comply with the Code, our policies, and applicable law.

Learn more by reviewing the Business Conduct, Reporting, and Non-Retaliation Policy.

Asking Questions and Getting Help

Resources for Getting Answers

Making Ethical Decisions



One of Amgen's values is Collaborate, Communicate, and Be Accountable. Open and candid dialogue is encouraged at Amgen. When in doubt, ask a question or raise an issue.

Resources for Getting Answers

Part of being able to Do The Right Thing is seeking help when you need it. If policies and procedures do not provide enough direction, ask your manager for clarification.

There are many resources available to help you when you have a question or need additional guidance about the topics discussed in this Code of Conduct or about compliance in general. These include:

Resource	Number to Call
Your Manager	Refer to Amgen's Corporate Directory
Regional or Local Compliance Representative	Refer to MyAmgen intranet
Human Resources (HR) Business Partners	Refer to MyAmgen intranet
HR Staff Relations	HR Connect 8-447-1111 or +1-805-447-1111 or follow your country's office procedures
The Ombudsperson	8-447-8200 or +1-805-447-8200 +1-866-511-6787 outside of Amgen, toll-free in North America
The Law Department	8-447-3360, from within Amgen, or +1-805-447-3360 in North America +41-41-3690-300 outside North America
A Compliance Council Member	Refer to the MyAmgen intranet
The Business Conduct Hotline	<p>You may contact the Business Conduct Hotline to report possible violations of the Code of Conduct, an Amgen policy, or applicable law.</p> <ul style="list-style-type: none"> To report via telephone in the U.S., Canada, and Puerto Rico: +1-888-376-5574 To report via telephone from another country, visit the Business Conduct Hotline website: https://amgenbch.ethicspoint.com To report via secure webform: https://amgenbch.ethicspoint.com <p>Amgen's Business Conduct Hotline operates 24 hours a day, every day of the year, and reports can be made in your native language. Anonymous reporting is permitted, except where limited by local law. Please check the Business Conduct Hotline website for country-specific restrictions and limitations.</p>

There are links to these and other resources on the MyAmgen intranet.

Learn more by reviewing the Business Conduct, Reporting, and Non-Retaliation Policy.

▶ Asking Questions and Getting Help

Resources for Getting Answers

Making Ethical Decisions

Making Ethical Decisions

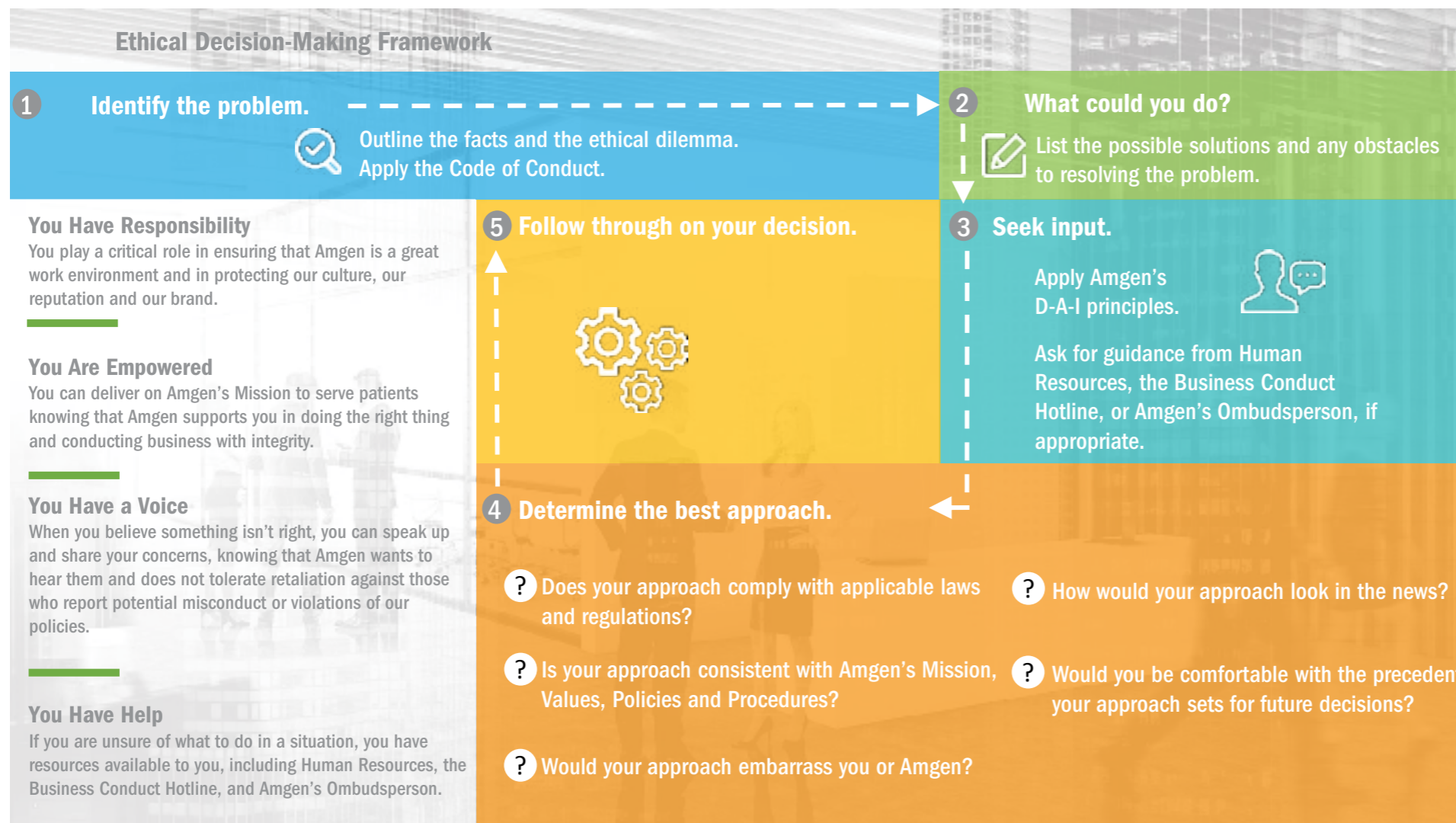
Amgen's Ethical Decision-Making Framework is designed to guide you through the decision-making process and help you ask the right questions. If you are still uncertain about the ethics or legality of an issue, seek additional guidance before proceeding.

Keep asking questions until you are certain that you will Do The Right Thing.

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Making Ethical Decisions



Reporting Concerns



Reporting a Possible Violation

Calling the Business
Conduct Hotline

Our Non-Retaliation Policy

We all have a responsibility to protect our company from unethical behavior and policy violations. You are required to tell someone if you know of a problem or suspect something is wrong. As a company, we value trust and respect. The earlier potential issues are raised, the sooner they may be resolved.

Reporting a Possible Violation

You play an important role in helping us meet our high standards for compliance. When you raise issues or report concerns, we can look into the matter, take timely and appropriate action, and make corrections, if required. The Audit Committee of the Board of Directors is responsible for overseeing accounting and financial reporting processes at Amgen. The Corporate Responsibility and Compliance Committee of the Board of Directors is responsible for overseeing corporate responsibility and compliance. To support these responsibilities, Amgen has established procedures for reporting and handling financial and other compliance complaints.

Financial complaints may relate to questionable accounting or auditing matters including noncompliance with internal accounting controls or dishonest statements involving a senior officer or accountant. Other compliance complaints include good faith concerns about conduct that is inconsistent with the Amgen Values or that violates a law or regulation, Amgen policy or standards of business conduct.

Extra Focus — 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 only allowing reports of accounting and financial irregularities.

Learn more by reviewing the Business Conduct, Reporting, and Non-Retaliation Policy.

Q. What matters should be reported?

A. You should report good faith concerns about financial irregularities and other compliance issues or misconduct, such as, violations of applicable law, Code of Conduct, Amgen policy, other governance documents or standards of business conduct, and any other serious wrongdoing or unethical conduct that is inconsistent with the Amgen Values.

Business Conduct Hotline

- To report via telephone in the U.S., Canada, and Puerto Rico: +1-888-376-5574
- To report via telephone from another country, visit the Business Conduct Hotline website: <https://amgenbch.ethicspoint.com>
- To report via secure webform: <https://amgenbch.ethicspoint.com>
- Amgen’s Business Conduct Hotline operates 24 hours a day, every day of the year, and reports can be made in your native language. Anonymous reporting is permitted, except where limited by local law. Please check the Business Conduct Hotline website for country-specific restrictions and limitations.

Do The Right Thing

- ◆ Promptly raise concerns about any suspected misconduct.
- ◆ Contact the Business Conduct Hotline if you suspect a violation of the Code of Conduct, an Amgen policy, applicable law or other governance document, or good business ethics in line with the Amgen Values. Contact information is provided in Section 2 (entitled “Asking Questions and Getting Help”) of this Code.
- ◆ Know how to find and use other telephone numbers and reporting procedures that may be appropriate for reporting specific issues.



Contacting the Business Conduct Hotline

The Business Conduct Hotline operates globally 24 hours a day, 7 days a week, 365 days a year. You can report a concern or ask a question in multiple languages.

When you call or submit a report to the Business Conduct Hotline, you will need to provide details about your issue or question. You will then be provided with a Report key to use to follow up on your reported concern or question. Though not required, you are encouraged to follow up in case additional information is needed. Please note that failure to provide all the information you have may prevent us from conducting a thorough investigation.

Amgen takes all reports to the Business Conduct Hotline seriously and handles reports on a case-by-case basis. Investigations are handled in a manner that, in our view, is as confidential as possible under the circumstances. The company will attempt to determine whether misconduct has occurred and will take the action it decides is appropriate.

You can check back with the Business Conduct Hotline at any time during the process to receive follow-up information or final feedback, using the Report Key you were originally given when you reported your concern. Please be aware that we may be limited in the information that can be shared. Note that investigations may also take some time to complete. Don't assume nothing is happening just because it takes a while to close a matter.

Anonymity and Confidentiality

In most locations, you may report matters to the Business Conduct Hotline anonymously. However, local laws in some countries discourage or prohibit anonymous reporting or restrict the scope of what may be reported through the Business Conduct Hotline, such as only allowing reports of accounting or financial irregularities. Please check the Business Conduct Hotline website for country-specific restrictions and limitations.

When you contact the Business Conduct Hotline, all information you submit will be treated in as confidential a manner as we determine is possible under the circumstances. This means the information you report will be shared only with those who need to know in order to answer your question or look into the matter. However, in some cases, Amgen may be required by law to reveal your identity. In addition, it may not always be possible to keep your identity confidential if, for example, you are one of a small number of people who know certain facts or you work in a very small office where it may be obvious from the details who originated the complaint.

▶ Reporting Concerns

Reporting a Possible Violation

Calling the Business
Conduct Hotline

Our Non-Retaliation Policy





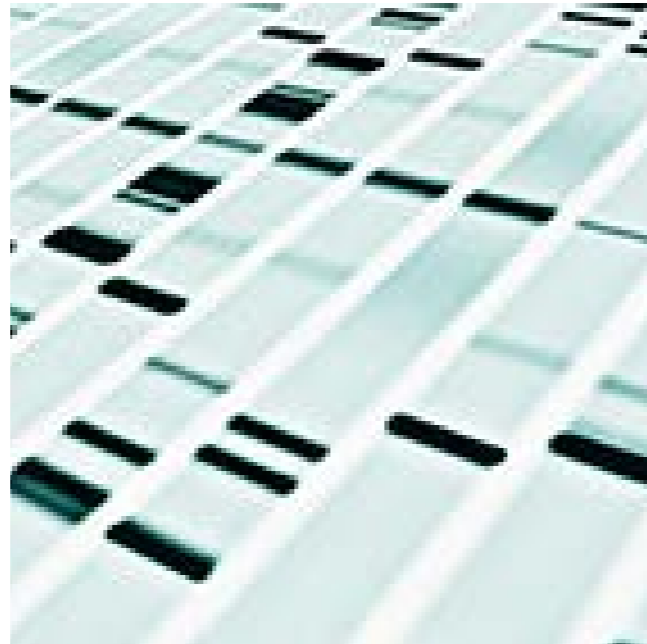
Our Non-Retaliation Policy

Our 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. Our policy applies to reports made through the Business Conduct Hotline or any other appropriate means.

Learn more by reviewing the Business Conduct, Reporting, and Non-Retaliation Policy.

The Healthcare Community



Amgen's mission is to serve patients. Every interaction we have with the Healthcare Community is an opportunity to demonstrate our commitment to meeting patient needs and to advancing science and medicine in their best interests.

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Respecting the Environment

Good Operating Practices

Amgen adheres to sound scientific and quality principles and ensures that these principles are reflected in our operations, including those in research, development, manufacturing and distribution. To uphold these principles, we comply with all applicable laws dealing with Good Laboratory Practices (GLP), Good Clinical Practices (GCP), Good Manufacturing Practices (GMP), and Good Distribution Practices (GDP) – collectively Good Operating Practices or “GxP.”

To ensure we are in compliance and working according to sound quality principles in our research laboratories, in our clinical trials, and in our manufacturing plants and distribution centers, we have adopted systems and internal controls for all GxP areas. These include:

- Corporate and functional area written policies and procedures with related training.
- Mechanisms to assess compliance with laws and Amgen policies.
- Guidelines and policies for proper laboratory animal care and use.
- Where appropriate, processes for reporting and investigating noncompliance with law or policies.
- Processes for conducting and responding to audits.
- Processes for handling regulatory inspections and investigations.

Amgen has also developed more specific guidance to further enable compliance with GLP, GCP, GMP, and GDP according to site operations.

Extra Focus — Good record keeping is an important part of good operating practices. Make sure you know the processes for proper documentation, and record handling. You also need to know our processes related to records and electronic signatures.

Learn more by reviewing functional policies, such as the Global Code of Ethics for Clinical Trials Policy and the Global Laboratory Animal Care and Use Policy.

Do The Right Thing

- ◆ Know the relevant compliance policies and procedures that apply to your GxP responsibilities.
- ◆ Participate in GxP training.
- ◆ Cooperate with all assessments and tests designed to ensure GxP compliance.
- ◆ Escalate GxP issues up the management chain if you do not get resolution.

Q. Of course quality is important, but can I skip a few steps in a procedure in order to meet our goals, especially when some of the requirements seem like administrative red tape?

A. No. Taking shortcuts is never acceptable. Doing so could jeopardize our ability to deliver our drugs to the patients who need them. If you believe a requirement is unnecessary, discuss the issue with your manager.

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Q. What should I do when I can't answer a government inspector's question during an interview?

A. If you do not know the answer, say so and tell the inspector you will get the answer promptly. Do not guess or make up a response. Also, do not present information in a misleading way or omit critical information.



Government Inspections and Requests

The biotechnology and pharmaceutical industries are regulated globally by many government agencies. As a consequence, we expect that our facilities and activities will be inspected from time to time. Amgen has a long history of working in cooperation with governments and regulatory bodies around the world, and we welcome outside government inspectors as our partners in ensuring quality.

Do The Right Thing

- ◆ Provide a positive and cooperative environment for inspectors throughout the inspection process.
- ◆ Never make false or misleading statements to any government official.
- ◆ Be familiar with your site's procedures for complying with a request for access to Amgen's premises or responding to an inquiry, subpoena, or other legal document.

Drug Safety – Reporting Adverse Events, Product Complaints, and Other Safety Findings

Amgen is committed to the worldwide collection and review of information regarding Adverse Events, Product Complaints and Other Safety Findings experienced by patients and trial subjects taking our approved or investigational products. Adverse Events, Product Complaints, and Other Safety Findings are considered Reportable Events as defined in Amgen policy. This information helps us better understand drug safety profiles and protect patient health.

Staff in all parts of the company – not just those who work in functions that interact with patients and physicians, such as Research & Development or Global Commercial Operations – should report any potential Reportable Events that come to their attention.

Learn more by reviewing the Adverse Event and Product Complaint Reporting Policy.

Do The Right Thing

- ◆ Notify a local Amgen Medical Information/Global Patient Safety representative within one business day if you become aware of a Reportable Event from any source involving a marketed Amgen product or one that is under development. You can reach Amgen Medical Information/Global Patient Safety:
 - From inside Amgen: 8-447-3505 or use the Amgen Safety Reporting Portal (ASRP): <https://www.amgenintakeportal.com/>
 - From outside Amgen within the U.S.: +1-805-447-3505 or +1-800-772-6436 (1-800-77-AMGEN)
- ◆ Know how to find and use the telephone numbers and reporting procedures for your location. Local Medical Information/Safety contact information is available on Amgen.com.
- ◆ If you know that an Adverse Event, Product Complaint, or Other Safety Finding has already been reported as part of a systematic data collection process (such as a clinical trial), you do not need to report it.

Q. At a family dinner, my grandmother mentioned an Adverse Event she was having while taking an Amgen product. Do I need to report this?

A. Yes. You must report all Adverse Events related to Amgen products that come to your attention at any time, even during vacation. All Adverse Events experienced by individuals taking Amgen products should be reported even though they may not, in fact, be caused by the Amgen product mentioned. Be sure to make the report within one business day.

Definition — Any untoward medical occurrence in a patient administered an Amgen product and which is not necessarily caused by the Amgen product. An AE can therefore be any unfavorable and unintended sign (e.g., an abnormal laboratory finding), symptom, or disease temporally associated with the use of a medicinal product, combination product, or medical device, whether or not considered related to the product. This includes: Any clinically significant worsening of a pre-existing condition or AE that has been associated with the discontinuation of the use of a product.



Communications with Members of the Healthcare Community

Interactions with the Healthcare Community (HCC) are subject to many laws around the globe. These laws restrict the economic benefits given to members of the HCC. They are sometimes referred to as anti-kickback and/or sponsorship laws.

We comply with these requirements by ensuring that we never improperly influence members of the HCC when they make decisions about the use of our products.

Definition — The term “healthcare provider” can have different meanings in different places. At Amgen, it generally means any person or entity in a position to purchase, prescribe, administer, recommend or arrange for the purchase, sale or formulary placement of an Amgen product. This includes but is not limited to physicians, nurses, office practice managers, pharmacists, wholesalers, and professional organizations.

Do The Right Thing

- ◆ Never promise or provide anything of value for the purpose of encouraging or inducing any member of the HCC to purchase, prescribe, use or recommend our products (be aware that special country-specific rules may apply to samples and items of de minimis value).
- ◆ When compensating any member of the HCC for their services, the amount must be commensurate with the services provided and reflect fair market value.
- ◆ You are required to collect and report any direct or indirect transfers of value including payments to members of the HCC consistent with applicable laws and regulations.
- ◆ Be familiar with the more detailed policies and procedures that apply to your interactions with members of the HCC in specific contexts and countries.
- ◆ Follow appropriate procedures to ensure that Scientific Research activities with members of the HCC are designed to fill a legitimate Amgen research need.

Promoting Our Products

In order to safeguard public health, every country in which we operate regulates how we promote and market our products. Good promotion and marketing activities, founded on honesty and truthfulness, help sell our products.

There are many ways that we further the science behind our products and create value for patients. Such ways include, for example, engaging with guideline developing bodies and patient and professional advocacy organizations, and creating value-based partnerships. These activities are intended to standardize healthcare practice decision-making and improve the quality of patient care. They are not to be used to market our products or promote a particular therapeutic intervention or brand.

Extra Focus — Know your role: If you work in Research & Development or Global Commercial Operations, you may interact with members of the HCC. It is important to be aware of the role you are playing and what activities are permitted in these different situations.

Learn more by reviewing the Communications with Members of the Healthcare Community Policy.

Do The Right Thing

- ◆ Be sure your promotional discussions and the promotional information you use or distribute are complete, accurate, and not misleading when you are promoting Amgen’s products.
- ◆ Never promote Amgen products off-label. All product claims must be consistent with country-specific approved labeling.
- ◆ When discussing our products, always provide fair balance – that is, be sure to describe all safety information fully and accurately and never misrepresent or minimize it in any way.



Q. I am meeting with a potential new customer for Amgen’s products. I would like to customize Amgen’s promotional materials so that they are focused on this particular physician’s needs. Is this okay?

A. No. Amgen’s materials are developed and reviewed through a rigorous process. You should never alter Amgen-approved materials or create your own.

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Scientific Exchange

Scientific Exchange is an important element of our business. Preparing and sharing timely, accurate, and balanced scientific information about our products and areas of therapeutic interest with members of the HCC is vital to our mission to serve patients.

Learn more by reviewing the Communications with Members of the Healthcare Community Policy.

Do The Right Thing

- ◆ When engaging in Scientific Exchange, use information that is truthful and not misleading.
- ◆ Amgen is committed to Scientific Exchange that is non-promotional in its nature and intent – abide by this.

Q. I am a nephrologist working in the Research & Development department. Isn't everything I say considered Scientific Exchange and therefore non-promotional?

A. No. The content and context of communications made by an Amgen representative determines whether such communications are promotional or Scientific Exchange, not the job function or training of the Amgen staff member.

Definition — “Scientific Exchange” refers to the bona fide exchange of medical and scientific information or data by Covered Persons (1) through scientific dialogue that is conducted in a non-promotional context (e.g., including, but not limited to, publications, medical education, disease state discussions, dialogue related to Amgen-sponsored clinical studies or investigator-sponsored studies), or (2) in response to an unsolicited question or request for information from a Healthcare Professional or Healthcare Institution. Scientific Exchange specifically excludes the communication of Promotional Information.



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Respecting the Environment

Amgen is committed to operating its sites worldwide in an environmentally responsible manner. We comply with all applicable laws and regulatory requirements relating to environmental, health, and safety matters.

Consistent with our obligations under applicable law, Amgen seeks to minimize the use and release of hazardous material and ensure its safe treatment and disposal. In addition, Amgen encourages the use of sustainable products, facilities, and processes through staff engagement, resource conservation, and application of green design principles.

Extra Focus — Each Amgen site is responsible for establishing and maintaining site-specific policies and procedures that are designed to meet or exceed applicable environmental, health, and safety laws.

Learn more by reviewing the Environment, Health and Safety Policy.

Do The Right Thing

- ◆ Be sure that your work activity is environmentally sound. Participate in Amgen programs targeting conservation of energy and resources, waste reduction, recycling, and the use of recycled or renewed products where appropriate.
- ◆ Promptly report all environmental incidents, including potentially harmful releases into the atmosphere, land or water.
- ◆ Cooperate fully with any investigation by Amgen into an environmental incident and with any subsequent corrective actions.
- ◆ Participate in Amgen-provided training.



Q. I need to dispose of a chemical container. Can it be thrown into the trash bin in our break room?

A. No. We need to follow appropriate waste disposal procedures for many compounds and chemicals that we use at Amgen. It is important to know what special requirements may apply. You should also be familiar with procedures for handling trash and recyclable materials.

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Our Relationships with Customers and Governments



Our business operates in a highly regulated environment. Maintaining ethical, respectful, and cooperative relationships with government agencies, policy makers, and other public officials is critical to our ability to deliver medicines to patients.

Antitrust and Unfair Competition

Anti-Bribery and
Anti-Corruption

Political Activities and
Political Donations

Global Trade – Export and Import
Controls and Trade Sanctions

Antitrust and Unfair Competition

Antitrust laws and competition laws promote fair competition. These laws often focus on ways to ensure that businesses compete on the basis of quality, price, and service. Amgen will not tolerate or participate in any business conduct, transaction or activity that violates the antitrust and competition laws of any country in which we do business.

This area of the law is extremely complex and can vary from state to state and country to country. These laws may be known as antitrust, monopoly, fair trade, competition, price discrimination, or cartel laws. They generally apply to interactions between current or potential competitors, as well as to interactions between a company and its customers, suppliers, and distributors. Consult the Law Department for guidance if you are about to engage in a situation that you think may involve any antitrust or competition laws.

Learn more by reviewing the Antitrust and Unfair Competition Policy.

Do The Right Thing

- ◆ Do not engage in discussions or make agreements with any actual or potential competitor about pricing policies, discounts, or other terms of sale, or splitting markets or customers.
- ◆ Do not engage in discussions or make agreements with any actual or potential competitor about the sale (or non-sale) of either our products or theirs.
- ◆ Never bribe or attempt to bribe customers or suppliers to help our business or hurt our competitors.
- ◆ Exercise caution when you engage in conduct that could give the appearance of unfair competition or the abuse of a dominant position in the marketplace.

Q. At a conference recently, a competitor's materials discussed its intent to dominate the market. Can we write about our market position like this?

A. No. It is not Amgen's policy to dominate or control markets, exclude rivals from access to customers or suppliers, or engage in pricing practices that would harm customers. You should avoid the use of overly aggressive language in Amgen documents and e-mails that could give this impression.



Important Note — You should avoid disparaging competitors to our customers. Instead of referring to competitors, use language that focuses on the benefits and services offered by Amgen to our customers.

Anti-Bribery and Anti-Corruption

Amgen is committed to the highest level of ethical business conduct, including compliance with applicable anti-bribery and anti-corruption (“ABAC”) laws and regulations. At their core, these laws and regulations make it illegal to offer, pay, ask for, or receive anything of value in return for inappropriate advantages. This extends to third-parties Amgen has engaged to support its business worldwide.

Learn more by reviewing the Anti-Bribery and Anti-Corruption Policy and U.S. Government Affairs Standard Operating Procedure: Gifts to Government Employees.

Do The Right Thing

- ◆ Understand and comply with Amgen’s ABAC principles and standards within the Anti-Bribery and Anti-Corruption Policy.
- ◆ Abstain from any activities that might violate or give any appearance of intention to violate such laws and regulations.
- ◆ Seek guidance from the Law Department, Compliance Leads, Chief Compliance Officer, and/or through the Business Conduct Hotline in any circumstances where doubt exists as to the appropriateness of proposed conduct.

▶ Our Relationships with Customers and Governments

Antitrust and Unfair Competition

Anti-Bribery and Anti-Corruption

Political Activities and Political Donations

Global Trade – Export and Import Controls and Trade Sanctions

Political Activities and Political Donations

There are legal restrictions on Amgen’s ability to support political candidates or engage in political activities. For example, in the U.S., corporate contributions for federal and some state and local elections are illegal, although federal law allows a corporation to administer a political action committee for its employees. Many countries outside of the U.S. also have laws that govern these types of activities.

Wherever you are located, you should seek the guidance of the Law Department before engaging in any lobbying or political activities, or using corporate resources for political activities.

Learn more by reviewing the appropriate policies or local resources for political activities.

Do The Right Thing

- ◆ In the U.S., observe the following:
 - Never contribute to, or spend money on behalf of, a candidate for public office in exchange for any official action by the candidate.
 - If you are involved in lobbying government entities or personnel on Amgen’s behalf, know and comply with the applicable laws.
 - Know and follow the approval processes at your site for political contributions and grants or other funding to government personnel or entities.

▶ Our Relationships with Customers and Governments

Antitrust and Unfair Competition

Anti-Bribery and Anti-Corruption

Political Activities and Political Donations

Global Trade – Export and Import Controls and Trade Sanctions

Q. I sent a personal check to a candidate that I know supports Amgen’s interests. How can I get reimbursed for this?

A. Staff members should not submit requests for reimbursement of any kind of personal political contribution to a candidate or political committee. Amgen is prohibited from reimbursing any personal political contribution.

Definition — Under United States federal law, “lobbying” includes influencing a variety of federal government activities such as policy making, legislation, and influencing the choice of candidates for federal office. It also can include influencing the negotiation, award, or administration of federal contracts or grants.



Global Trade – Export and Import Controls and Trade Sanctions

In order to ensure our global supply chain is not interrupted, we fully comply with all global trade requirements. The export and import laws apply to shipping, hand-carrying and electronic transfer of goods or technology, to third parties and Amgen sites in different countries. For example, when you email the specifications for a device to a colleague in another country, you are exporting it, and export/import laws apply to that activity. In addition, many countries impose trade restrictions, such as economic sanctions, embargoes, and boycotts.

Contact Global Trade Operations if you have questions when importing or exporting.

Contact Global Trade Compliance if you have questions regarding export controls, economic sanctions, boycott requests, and programs and policies.

Learn more by reviewing the Trade Compliance Policy.

Do The Right Thing

- ◆ In all international dealings, make sure you know and comply with all export and import controls and trade restrictions.
- ◆ Know your site-specific procedures for shipping and other export and import activities.

▶ Our Relationships with Customers and Governments

Antitrust and Unfair Competition

Anti-Bribery and Anti-Corruption

Political Activities and Political Donations

Global Trade – Export and Import Controls and Trade Sanctions

Q. If I take laboratory equipment outside the United States to an Amgen facility in Europe, is that an export?

A. Yes. It is an export and subject to U.S. export control laws. Similarly, if you bring the laboratory equipment back to the U.S., it becomes an import and is subject to import control laws.



Our Staff and Our Workplace



The Amgen Values are most evident in our work environment. As Amgen staff members, we take pride in living the company's values in everything we do, and we seek to foster an environment of mutual trust and respect.

Our Work Environment

Non-discrimination and a Harassment-Free Workplace

Safe and Healthy Workplace

Protection of Personal Information

Use of Company Systems

Social Media

Our Work Environment

All staff members worldwide must follow all applicable laws and observe the highest standards of professional behavior, exhibit integrity at all times, treat others with respect, and comply with company policies.

All staff members worldwide must respect human rights in all countries in which we do business. Any and all forms of trafficking in persons, and slave and child labor, are strictly prohibited.

You are responsible for maintaining the company’s good reputation. With this in mind, never engage in any conduct or activity that could raise questions about Amgen’s honesty or integrity, or that might cause embarrassment to the company. Ultimately, others judge Amgen by whether you live the Amgen Values.

Learn more by reviewing the Business Conduct, Reporting, and Non-Retaliation Policy and the General Business Conduct Policy.

Do The Right Thing

- ◆ Follow all Amgen policies, including those discussed in the Code of Conduct, and live the Amgen Values.
- ◆ Be honest in your words and actions. Never act in a way that could discredit Amgen, or could be offensive to customers, government personnel, colleagues or others.
- ◆ Act professionally and always adhere to accepted industry or professional standards that apply to you.
- ◆ Take the right steps to safeguard Amgen property.
- ◆ Do not engage in or promote the trafficking of persons, or slave or child labor, or contract with suppliers with known violations regarding human trafficking, slave or child labor.

Important Note — It may seem that one person’s choices and actions will have little impact on a large company like Amgen. This is not true. Everything you do helps to build and sustain an environment that embraces the Amgen Values.



Q. I understand we are expanding our business into new parts of the world. Different countries have different cultures, so will the Amgen Values, the Code of Conduct and our policies still apply in these new business settings?

A. Yes. The Amgen Values are global and enduring. Similarly, the Code of Conduct describes policies that apply to all of us in every country and culture in which we do business. Our business may change, our markets may change, but the Amgen Values and the Code of Conduct will continue to guide us.

▶ Our Staff and Our Workplace

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Q. What is unlawful discrimination?

A. The laws are different from country to country, and state to state in the U.S., but generally these laws prohibit discrimination in employment based on the inappropriate use of personal characteristics, such as race, national origin, gender, religion, and disability. Learn what policies apply in your location.

Non-discrimination and a Harassment-Free Workplace

Amgen is committed to fostering a diverse workforce and a culture of inclusion. A diverse workforce with varied backgrounds and ideas strengthens Amgen and allows us all to strive to do our best.

Behavior that amounts to unlawful discrimination or harassment violates Amgen’s policies and the Amgen Values. This behavior undermines our ability to work together in teams, and it is contrary to our belief in the importance of respecting each other.

Extra Focus — Be aware that e-mails, posters, calendars, screen savers, photographs, cartoons, etc., which are inappropriate and offensive to others may be considered harassment. Making derogatory references concerning personal characteristics, such as gender, race, or religion, as well as inappropriate touching and personal threats, could also be harassment.

Learn more by reviewing the Business Conduct, Reporting, and Non-Retaliation Policy the Equal Employment Opportunity, Anti-Discrimination and Anti-Harassment Policy, and the Affirmative Action Policy.

Do The Right Thing

- ◆ Never engage in any unlawful discrimination.
- ◆ Support the company’s efforts to combat harassment in the workplace and to promote equal employment opportunities.
- ◆ Discourage and report comments, jokes or epithets that are inappropriate, offensive or derogatory to others.
- ◆ Never seek sexual favors in return for employment rewards.
- ◆ Never take part in conduct that is hostile or threatening nor encourage others to do so.
- ◆ Know how to find and use telephone numbers that are appropriate for reporting specific issues.

Safe and Healthy Workplace

Safety is a priority in everything we do. You have an obligation to your fellow staff members and to those who enter our premises to be sure work conditions in your area meet our safety requirements. You can do this, for example, by participating in safety training, following safety standards, and promptly reporting safety concerns.

We are committed to a workplace without substance or alcohol abuse. You may not be on Amgen premises, in company vehicles, or perform work for Amgen if you are impaired by drugs or alcohol. We encourage you to seek treatment for any substance-related problems.

Amgen is committed to a workplace free of violence. You should immediately report offensive, threatening or violent behavior, whether verbal or physical. Violent or threatening acts are not permitted and will not be tolerated.

Learn more by reviewing the Environment, Health and Safety Policy, the General Business Conduct Policy, and the Drug, Alcohol & Tobacco Policy.

Do The Right Thing

- ◆ Act in a reasonably safe manner.
- ◆ Be responsible for any visitors you bring on site.
- ◆ Know how to use and maintain equipment that you use in your job and wear necessary personal protective equipment.
- ◆ Know the health and safety rules for your site or area, including emergency response plans.
- ◆ Promptly report all environmental, health, and safety issues including unsafe conditions, accidents, near misses, work related injuries and illnesses, and threatening or violent behavior.

Important Note — On occasion, alcohol may be provided or available at some work-related or company-sponsored events. If you choose to drink at these events, we expect you to behave safely and responsibly. Managers who organize these functions must ensure responsible alcohol distribution and use.

Q. Should I report every injury that happens to me on the job, even the minor ones?

A. Yes. You should promptly report all injuries, even minor ones. Sometimes seemingly minor injuries can result in serious health consequences. Reporting all your injuries ensures that you receive proper medical treatment and that we can take appropriate measures to prevent future injuries.



Protection of Personal Information

At Amgen, we respect the privacy of the Personal Information entrusted to us. Everyone in the company worldwide has a role to play in protecting, securing, and appropriately processing (e.g., collecting, using, accessing, viewing, storing, transferring) Personal Information. Amgen, and parties acting on Amgen’s behalf, process various types of Personal Information about patients, caregivers, consumers, clinical trial subjects, healthcare professionals (e.g., physicians or nurse practitioners), Amgen staff members and contractors, and others for a variety of lawful business purposes.

The lawful processing 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 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 such, all reported Privacy Incidents are thoroughly investigated and appropriately addressed in a prompt manner.

Learn more by reviewing the Protection of Personal Information Policy.

Do The Right Thing

- ◆ If you process an individual’s Personal Information, you must comply with all laws and Amgen governance documents in connection with the processing of such Personal Information. This may include providing the individual with proper notice and, if necessary, obtaining the individual’s consent pursuant to applicable laws and Amgen policies and procedures.
- ◆ If you have access to Personal Information, you must safeguard it, use it only for lawful purposes, and share it only with authorized people or entities.
- ◆ You must comply with specific protocols or agreements with respect to how Amgen handles Personal Information. For example, commitments made in clinical trial patient informed consent forms or in an Amgen website privacy statement.
- ◆ When processing Personal Information, you must use appropriate security measures to protect Personal Information against improper access, destruction, alteration, storage, or use.
- ◆ Laws vary by country. You must know your function’s policies and procedures for protecting Personal Information. Also be aware that special rules may apply to some types of Personal Information and certain processes that you may undertake.
 - For guidance related to your specific project or jurisdiction, please contact the Amgen Privacy Office at privacyoffice@amgen.com.

Q. What should I do in the event I suspect or know of a Privacy Incident?

A. In the event of a suspected or known Privacy Incident, you must secure the Personal Information and promptly call the Business Conduct Hotline. A Privacy Office or Law Department representative will contact you upon the Privacy Office’s receipt of the incident report. You must fully cooperate with the Privacy Office’s investigation of the Privacy Incident.

Definition — Generally, “Personal Information” is information relating to an individual whose identity is known or can be figured out from the information by direct or indirect means. The definition can vary by country and by law. Examples include an individual’s name, address, or family data.

▶ Our Staff and Our Workplace

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Use of Company Systems

Social Media

Use of Company Systems

Company systems are corporate assets that generally should only be used for company business. All Amgen systems and the records and information stored on them are the property of the company regardless of how you mark or label them. Generally, you should not expect any confidentiality or privacy when using company systems, although the local laws in some countries may give staff in those countries greater rights. Where legally permitted to do so, Amgen may at its sole discretion inspect your files and messages or monitor your Internet usage at any time without advance notice or consent. Use of a company system constitutes consent to inspection, monitoring, and access by Amgen, as permitted by law.

Extra Focus — Examples of company systems include Amgen’s computers, e-mail, voicemail, instant messages, telephone records, networks, and Internet access.

Learn more by reviewing the Use of Company Systems and Internet Conduct Policy and the Social Media Policy.

Do The Right Thing

- ◆ Never create, send, display, or receive inappropriate, offensive, or disruptive material on any Amgen system.
- ◆ To protect yourself and Amgen, you should not share your password for any Amgen system.
- ◆ Do not expect confidentiality or privacy when using company systems, except as provided by applicable law.
- ◆ Return all Amgen property and equipment, including all information and records stored on them, when your employment ends.



Q. Can I use my Amgen computer for personal matters?

A. Generally, you may access e-mail and the Internet using company systems for limited personal purposes under certain conditions. For example, your use should not violate the law or Amgen policy or impact your job performance.

Social Media

As new communication and collaboration media become available, Amgen staff must ensure that their use of Social Media for Amgen-related purposes is appropriate.

When using social media you must:

- Follow all Amgen’s Values, policies, procedures, laws, and regulations
- Report all suspected Adverse Events, Product Complaints, and Other Safety Findings

You must not:

- Claim to represent Amgen unless authorized to do so

Guidelines for Using Social Media

When using social media, you must not:

- Re-post an internal Amgen notice that has not been approved for external sharing
- Promote or make claims about the efficacy or safety of an Amgen- or competitor-marketed or pipeline product
- Post about a potential development and commercialization collaboration with a company before the transaction has been closed and disclosed to the public
- Post information about patients who have shared their experience about using an Amgen product at an internal all-staff meeting without getting the patient’s and Amgen’s consent
- Share an internal MyAmgen article through social media because you think someone would be interested, unless the article is approved for external sharing on social media channels
- Say anything online that states or implies that you are speaking on behalf of Amgen, unless you are an Amgen Authorized Spokesperson

You must:

- Make it clear that you work for Amgen when posting content related to the company
- Put a statement on your social media profile (if it is apparent that you work for Amgen) that your views are not Amgen’s
- Remember that regulations related to product labeling and promotion, and rules about privacy, vary by country and region; what is allowable in one place may not be in another

All Amgen-owned external digital assets, such as websites, social media sites, and apps must be registered here: Amgen’s Global Digital and Social Media Governance.

To learn more read the Social Media Policy.



Our Stockholders

Code of Conduct



Conflicts of Interest

Financial Integrity

Business Records and Information

Safeguarding Amgen's Information

Insider Trading

Investor and Media Relations

Our stockholders are the owners of our company and investors in our future. We all play an important part in creating value for them, as we create value for patients and for ourselves as staff members, and in protecting the company from risk.

Conflicts of Interest

You are responsible for acting professionally and making business decisions without any consideration of personal gain. Avoid situations in which personal interests, outside activities, financial interests or relationships conflict, or even appear to conflict, with the interests of Amgen. We prohibit such conduct.

Learn more by reviewing the Conflicts of Interest Policy.

Do The Right Thing

- ◆ Avoid situations where a reasonable person would question whether you were inappropriately influenced in making a business decision.
- ◆ Deal with suppliers, customers, and everyone doing business with Amgen objectively, professionally, and fairly.
- ◆ Never seek or accept payments, fees, loans or services from any person or firm as a condition of doing business with Amgen.
- ◆ Do not accept gifts from people or firms doing or seeking to do business with Amgen. In certain cultures where declining a gift would likely cause cultural offense or embarrassment, the Conflicts of Interest Policy provides a Cultural Courtesy Gift Exception that accommodates these rare and specific situations.
- ◆ Never do business on behalf of Amgen with a relative or a person with whom you have a close, personal relationship.

Q. I've been invited to speak at an industry conference that I think will benefit Amgen. In addition to a waiver of conference registration fees, the organizers have offered to pay me a small honorarium and to pay for my travel and hotel expenses. May I accept their offer?

A. You may not accept money for speaking at a conference or meeting. However, if your manager determines that your attendance benefits Amgen, you may accept a waiver of conference fees. You may also accept incidental meals generally offered to attendees. Travel, hotel, and all other related expenses should be paid by Amgen as provided in Amgen's travel policy.

Definition — A “conflict of interest” exists any time you allow the prospect of personal gain to improperly influence the way in which you conduct Amgen's business. Some examples of conflicts include using your Amgen position for personal gain, outside employment with a competitor and favoritism in awarding company business.

Financial Integrity

We have a responsibility to provide full, fair, accurate, timely, and clear disclosures in reports and documents we file with governmental and regulatory agencies. You must help ensure that we meet that responsibility. Our CEO and officers in Finance have additional responsibilities and must adhere to a specific Code of Ethics that supplements this Code.

Learn more by reviewing the Code of Ethics for the CEO and Senior Financial Officers, the Anti-Bribery and Anti-Corruption Policy, and the Information Classification and Records Management Policy.

Important Note — Financial records are not only those that we report publicly. Records containing financial information are found across the company and form the foundation of our public disclosures. Every financial record in every function must be accurate, true, and complete.

Do The Right Thing

- ◆ Keep Amgen records accurate, true, and complete.
- ◆ If you are involved in preparing reports and documents that Amgen submits to financial regulators, be sure that the content is full, fair, accurate, timely, and clear.
- ◆ Cooperate fully with Amgen's independent public accountants and never take any action to coerce, manipulate, or mislead them.



Business Records and Information

Manage all records and information in a manner that protects the integrity of the information and ensures appropriate access. Our policy relating to records and information facilitates decision-making, supports Amgen's legal, financial, regulatory, and contractual obligations, and promotes organizational efficiency.

Extra Focus — Confidential Disclosure Agreements protect a party's disclosure of information by requiring the party that receives the information to use and handle it in a confidential way. Often, when two companies are considering doing business together, they sign such an agreement to share information that will enable a better understanding between them.

Learn more by reviewing the Information Classification and Records Management Policy.

Do The Right Thing

- ◆ Be familiar with the Records Retention Schedule as it applies to your function's records.
- ◆ Retain all records for the time needed to comply with applicable laws and Amgen's policies.
- ◆ Retain records created using newer technologies, such as: Blogs, Wikis, Instant Messages, and Unified Messaging (voice or email)
- ◆ If a Hold Order is issued, you are required to suspend destruction of, preserve, and retain the records and information identified in the Hold Order.
- ◆ Never create, alter, or destroy records or documents for the purpose of impeding the efforts of any governmental or regulatory agency.

Q. I am moving to a new department in Amgen. Should I take all my records with me?

A. Many of your electronic records will automatically transfer with you, such as e-mails and those stored in electronic folders. However, records that are part of your old department's business should stay with that department. Before you transfer, talk with your manager about the best way to ensure that the proper records (including electronic records) remain with your old department.

Definition — A "Hold Order" is a written directive that results from actual or anticipated litigation, regulatory inquiries, or governmental investigations. It requires you to stop normal course destruction and deletion of records and information listed in the Hold Order.

Safeguarding Amgen's Information

Information is an especially important asset for a company like Amgen. It gives us a key competitive advantage and must be protected. Information you create or receive on the job is the company's property, and you are responsible for safeguarding it.

Amgen is well known in business and financial communities, and you may know someone who would be interested in information you have about Amgen. However, you should never discuss Amgen's protected information with anyone outside the company unless such disclosure has been approved in advance as required by our policy.

Before sending confidential data to any outside companies, institutions, or individuals, you need to obtain appropriate Corporate Authorization. A written Confidential Disclosure Agreement is also needed, except when the other party is a governmental regulatory authority, or a non-governmental body working on behalf of a governmental authority. For example, a Confidential Disclosure Agreement would not be required if the other party is a national health or drug regulatory agency, or a committee of scientists officially tasked to work on the agency's behalf. Contact the Law Department with any questions, or to obtain a Confidential Disclosure Agreement or to ensure the appropriate confidentiality language is included in the applicable agreement with such company, institution or individual.

Extra Focus — Confidential Disclosure Agreements protect a party's disclosure of information by requiring the party that receives the information to use and handle it in a confidential way. Often, when two companies are considering doing business together, they sign such an agreement to share information that will enable a better understanding between them.

Learn more by reviewing the Confidential and Proprietary Information Policy.

Do The Right Thing

- ◆ Understand the different types of information that Amgen has and know how to properly use and protect them.
- ◆ Never use Amgen's information for non-Amgen business or personal endeavors.
- ◆ Never provide Amgen's information to any third party without first getting corporate authorization as required by our policy. Also, use a Confidential Disclosure Agreement when required by policy and follow other procedures in your function.
- ◆ When you have confidential third-party information, respect its proprietary and/or confidential nature. Do not use or disclose this information in a way that violates any legal or contractual obligations with the third party.

Q. I am an Amgen employee and an author of a manuscript for a scientific publication. The manuscript includes Amgen data. The journal to which Amgen is submitting the manuscript has asked me to sign an agreement that transfers Amgen's copyright in the manuscript to the journal. Under the Policy, what are my obligations?

A. Under the Policy, any agreement that appears to transfer any interest in an Amgen copyright to a Third Party (as defined in the Policy) must receive the prior approval of the Law Department. In addition, if approved by the Law Department, those types of agreements may only be signed by certain Amgen staff members. Those Amgen staff members must have Corporate Authorization as defined in the Policy.

Insider Trading

Many countries have laws regarding insider trading. It is against those laws and Amgen Policy to trade Amgen securities while aware of material, non-public information about Amgen. You also may not share material, non-public information with others.

Even if the activities prohibited under Amgen's Insider Trading Policy are not illegal in the country where you are based, our Insider Trading Policy applies to you regardless of your location. Amgen's policy requirements also apply to family (including spouses, minor children, or any family member living in the same household) of Amgen staff.

Learn more by reviewing the Insider Trading Policy.

Do The Right Thing

- ◆ Never purchase or sell any type of security while you are aware of material, non-public information about Amgen or another company.
- ◆ Do not directly or indirectly pass along ("tip") material, non-public information about any company to anyone who may trade securities while aware of such information.
- ◆ Do not directly or indirectly participate in transactions in Amgen securities that are aggressive or speculative or may give rise to an appearance of impropriety.

Definition — "Material, non-public information" is any information that a reasonable investor would consider important in determining whether to buy, sell, or hold a security and that has not yet been widely disseminated to the public with sufficient time for the financial market to become aware of it.



Q I want to sell some Amgen stock to pay for a family member's education expense. I might have material, non-public information about Amgen, but this is not the reason I want to sell stock. Can I still sell my Amgen stock?

A. If you are aware of material, non-public information about Amgen you should not trade in Amgen stock. Even if you have an unrelated reason why you want to sell Amgen stock, you must not have material, non-public information about Amgen when you sell.

Q. During a neighborhood picnic, a reporter asked me what I thought the local political candidates' positions were on issues that faced Amgen. I wasn't sure what to say. Was I correct to not respond?

A. Yes. Your personal opinion might have been misinterpreted as an official statement from Amgen. Any public statement about Amgen should be reserved for the Corporate Affairs Department. The best thing to do is to say that you don't speak for Amgen and refer the reporter to the appropriate media contact within Amgen.



Investor and Media Relations

As a publicly traded company, Amgen has a responsibility to maintain an orderly flow of information to the general public and to its investors. All of Amgen's dealings with the investment community and the media, including reporters, must be properly managed to make certain that accurate and timely information is given to investors and the public. We also need to be careful to comply fully with all laws governing our disclosures.

Reporters, media representatives, investors, and investment analysts may try to solicit information directly from you. Only members of senior management or designated Corporate Affairs spokespersons are authorized to speak to the news media. Investor inquiries will be handled in a similar manner by Investor Relations. If you receive an inquiry about Amgen from an investor, financial analyst, the media or any other outside party, you should not respond to the request.

Do The Right Thing

Refer all requests for information from the media or financial community to the appropriate Amgen resource:

Who is Calling	Refer To
Media inquiries (such as reporters, editors, and other media representatives)	See the list of media relations representatives on Amgen's external Web site
Investment community inquiries (such as financial analysts and stockholders)	Investor hotline: 8-447-1060 from within Amgen, or +1-805-447-1060 outside of Amgen

Additional Information About Compliance at Amgen



Amgen's Compliance Program

List of Policies

Amgen's Compliance Program

The Worldwide Compliance & Business Ethics function oversees Amgen's compliance program, which is driven by Amgen's commitment to conducting business with integrity and in compliance with all applicable laws. We do this by informing and educating staff and others who conduct business on our behalf about the requirements and our expectations. We also regularly monitor our compliance program to identify any existing compliance-related issues, to determine whether the program is operating as intended, and to identify potential improvements.

The major features of our compliance program include:

- Oversight by our Board of Directors through its Corporate Responsibility and Compliance Committee.
- A Chief Compliance Officer, who is responsible for making sure that the necessary elements of an effective compliance program are in place. The Chief Compliance Officer also reports to the Board of Directors on compliance matters.
- A Compliance Committee, which champions Amgen's culture of compliance and business ethics by ensuring that it is the foundation of the company's strategy, goals, and objectives. This Committee is chaired by Amgen's Chairman and Chief Executive Officer and is comprised of the Operating Team.
- A Compliance Council, which consists of senior management from each of the company's functions. Compliance Council members provide input and recommendations as to compliance priorities, policies, decisions, and strategic direction of the program.

- Written policies and supporting documentation such as this Code of Conduct and our Global Corporate Compliance Policies.
- Communication of our compliance program requirements through our Code of Conduct, our internal and external websites, and other communication vehicles.
- Ongoing training and education of staff on our compliance program and its requirements.
- A Business Conduct Hotline, through which anyone, internal or external to Amgen, can report misconduct without fear of retaliation. Callers may remain anonymous unless they are from countries where anonymity is discouraged or not permitted by law.
- Routine monitoring of our compliance risks through normal processes embedded in our operations and audits that use a unified approach across our business activities. Results are reported to the Chief Compliance Officer.
- Timely and appropriate investigations into reported concerns about potential compliance violations.
- Appropriate responses to violations of our policies and steps to prevent recurrence.
- A risk-based approach to the design of our Program and program activities.

Extra Focus — Amgen's Compliance Council is a cross-functional body that supports the Chief Compliance Officer in setting the strategic direction for our compliance program.

▶ Additional Information About Compliance at Amgen

Amgen's Compliance Program

List of Policies

List of Policies

Amgen Policies and other documents referenced in this Code:

- ◆ Adverse Event and Product Complaint Reporting Policy
- ◆ Affirmative Action Policy
- ◆ Anti-Bribery and Anti-Corruption Policy
- ◆ Antitrust and Unfair Competition Policy
- ◆ Business Conduct, Reporting, and Non-Retaliation Policy
- ◆ Code of Ethics for the CEO and Senior Financial Officers
- ◆ Communications with Members of the Healthcare Community Policy
- ◆ Conflicts of Interest Policy
- ◆ Drug, Alcohol & Tobacco Policy
- ◆ Environment, Health and Safety Policy
- ◆ Equal Employment Opportunity, Anti-Discrimination and Anti-Harassment Policy
- ◆ General Business Conduct Policy
- ◆ Global Code of Ethics for Clinical Trials Policy
- ◆ Global Laboratory Animal Care and Use Policy
- ◆ Information Classification and Records Management Policy
- ◆ Insider Trading Policy
- ◆ Protection of Personal Information Policy
- ◆ Social Media Policy
- ◆ Trade Compliance Policy
- ◆ U.S. Government Affairs Standard Operating Procedure: Gifts to Government Employees
- ◆ U.S. Government Affairs Standard Operating Procedure: Lobbying Activities
- ◆ U.S. Government Affairs Standard Operating Procedure: Use of Corporate Resources for Political Activity
- ◆ Use of Company Systems and Internet Conduct Policy

▶ Additional Information About Compliance at Amgen

Amgen's Compliance Program

List of Policies