



# Code of Business Conduct

**Abbott**



Dear Colleague:

I'm pleased to present our Code of Business Conduct. This is a critically important document because it describes our company's expectations of every employee as we represent Abbott in our daily work.

Abbott has a long history of doing business the right way. More than 125 years ago, our founder, Dr. Wallace Abbott, was one of the creators of what was known as the ethical pharmaceutical industry, which first established the high standards of safety and efficacy that are the foundation of the modern health care business. Our Code crystallizes and builds on those principles to carry this great tradition around the world and into the future.

It's up to each of us to build our company and our brand by holding ourselves to the highest ethical standards.

The fundamental message of the Code is straightforward: It's up to each of us, as Abbott employees, to build our company and our brand by holding ourselves to the highest ethical standards and by living our values and continually operating with honesty, fairness, and integrity.

We earn our reputation every day by the decisions we make and the actions we take. Our Code embodies our values and provides a foundation for our responsibilities and behaviors that will help us make the best choices for Abbott, for ourselves, and for the many people we serve. Abbott's Board and our company leadership fully support the Code and the policies, procedures and principles it embodies.

We all share in the responsibility to live our values every day. That includes keeping a watchful eye on our business activities and reporting concerns in good faith without fear of retaliation.

Our work at Abbott is of the utmost importance to the people we serve. Our products affect people's health and lives in the most crucial ways. That obliges us to not just follow the letter of the laws that govern our work, but also the spirit and the ethical expectations that come with being a leader in a business as important as ours.

Thank you for incorporating the principles and values expressed in our Code into your daily work for Abbott, and for all you do to make our company great.

**Miles D. White**

*Chairman of the Board and Chief Executive Officer*

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# 1

## OUR CODE IN ACTION

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The promise of our company is in the promise that our work holds for health and life, and we live that promise through the actions we take each and every day.

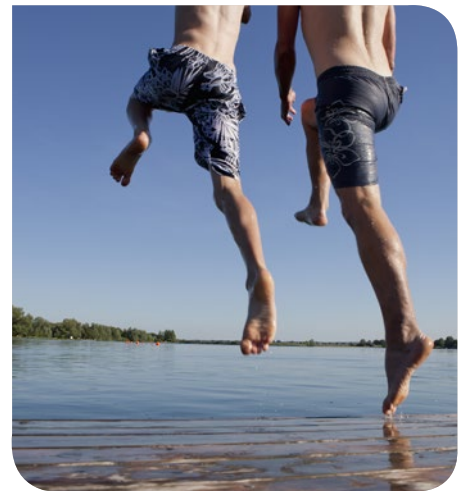
### IN THIS SECTION

Honesty, Fairness and Integrity

Decision Making

## HONESTY, FAIRNESS AND INTEGRITY

It is up to every person working for Abbott – at all levels of the organization – to uphold the Abbott values (Pioneering, Achieving, Caring and Enduring) and operate with honesty, fairness, and integrity. Abbott's long-term success depends upon the choices we make every day. We are all responsible for understanding how this Code applies to our work and decision-making, operating at all times in line with this Code, and for promoting compliance with this Code by others operating on Abbott's behalf. The fundamental message of the Code is straightforward: It's up to each of us, as Abbott employees, to build our company and our brand by holding ourselves to the highest ethical standards and by operating with honesty, fairness, and integrity.



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It is up to every person working for Abbott – at all levels of the organization – to uphold the Abbott values and operate with honesty, fairness, and integrity.

## DECISION MAKING

Abbott is a global company. We conduct business in over 150 countries around the world and our employees are citizens of many nations with diverse cultures and beliefs. We must recognize the global impact of our actions and decision making and realize that Abbott is subject to many laws, regulations, and other requirements that vary across the countries in which we operate.

Each of us will, at times, be faced with situations where the right course of action about a new situation is hard to determine. We are all expected to understand the Abbott principles embodied in this Code, along with the Abbott policies and procedures applicable to our work. Many additional resources are available at Abbott for advice and guidance, including:

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Colleagues  
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Managers and supervisors  
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The Office of Ethics and Compliance  
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Human Resources  
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The Legal Division  
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Learn more about the different channels available to ask questions and raise concerns in the Speak Up section.  
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## DECISION MAKING

These resources can help guide decision making. Our decision making AID is also available to help work through issues when the best path forward is not obvious. This tool provides an approach to thinking through the alternatives to, and impacts of, decisions we may face in our work.

In addition, help is always available to ensure understanding of this Code's requirements. General assistance and contact information for your local or regional Office of Ethics and Compliance personnel is available on the OEC website ([abbott.sharepoint.com/sites/abbottworld/EthicsCompliance](http://abbott.sharepoint.com/sites/abbottworld/EthicsCompliance)).



If you are unsure about the right course of action, follow the steps outlined in the Decision Making AID section.



We must recognize the global impact of our actions and decision making.





# 2

## OUR CUSTOMERS

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We improve health for  
patients, consumers, and  
communities.

### IN THIS SECTION

Patients and Consumers

Health Care Professional Judgment

## PATIENTS AND CONSUMERS

## We prioritize the health and well-being of patients and consumers.

We are passionate about helping people lead healthier lives. Each and every day, we have the opportunity to improve people's lives and create healthier societies through our work. Caring for people is fundamental to what we do, and it is both a tremendous privilege and a great responsibility.



Learn more about our commitment to patients and consumers:

[abbott.com/about-abbott/who-we-are.html](http://abbott.com/about-abbott/who-we-are.html)

## HEALTH CARE PROFESSIONAL JUDGMENT

## We respect the expertise of health care professionals who provide guidance about health care treatment options and healthy living.

Health care professionals, such as physicians, pharmacists, nurses, researchers or laboratory staff, must use their independent judgment to decide the best course of care for their patients based on their training and expertise. We are committed to working with health care professionals to provide them with timely and accurate information to assist them in making decisions and providing advice to their patients. We can achieve our mission of supporting health only through a truly collaborative approach.





# 3

## OUR PRODUCTS

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We earn Abbott's positive reputation by consistently delivering high quality products.

### IN THIS SECTION

Product Quality

Product Promotion

## PRODUCT QUALITY

## We produce and deliver safe, effective products that people trust.

We endeavor to maintain the highest level of quality throughout our business. This effort starts with the sourcing of materials and the manufacture of our products and moves through how we market, sell, and supply our products, including through our business partners – delivering high quality is imperative every step of the way. Our commitment to the health and safety of the people who use our products is always at the forefront of everything we do.



Learn more about our products:

[abbott.com/product-list.html](http://abbott.com/product-list.html)



## WHAT DO I DO IF SOMEONE TELLS ME ABOUT A PRODUCT QUALITY ISSUE?

### **Q What do I do if someone tells me about a product quality issue?**

**A** If we become aware of an unfavorable user result that occurred while using an Abbott product, we must report it to the appropriate individuals or groups within Abbott. We must report adverse events with any of our products in the timeframe required by our division procedures, even if we are not sure there is a cause-and-effect relationship between the product and the “event.”

## PRODUCT QUALITY

We are committed to timely identifying, evaluating, and addressing product safety issues. We provide health care professionals and institutions with the information they need in order to use Abbott's products safely and effectively, and we communicate with regulatory or public health agencies in the event of potential safety concerns.

We take action to prevent counterfeiting, illegal diversion, and theft of our products. We adhere to all applicable trade regulations, such as export and import controls issued by governments for foreign policy and national security reasons. Trade regulations include sanctions, restrictions on exporting of certain products, and prohibitions on conducting business with certain individuals, groups or entities.

## PRODUCT PROMOTION

**We promote and sell our products with honesty and integrity.**

Our statements about our products, in all materials and communications, will be balanced and truthful and consistent with the approved label. In promoting our products, we provide information that is consistent with scientific evidence, leading medical practice, and the approved product labeling requirements in the countries where we operate.



Learn more about our quality procedures:

[abbott.sharepoint.com/sites/abbottworld/Quality](http://abbott.sharepoint.com/sites/abbottworld/Quality)



Learn more about the U.S. Food, Drug, and Cosmetic Act: [fda.gov/RegulatoryInformation/LawsEnforcedbyFDA/FederalFoodDrugandCosmeticActFDCA](http://fda.gov/RegulatoryInformation/LawsEnforcedbyFDA/FederalFoodDrugandCosmeticActFDCA)



## PRODUCT QUALITY

We promote our products for the purposes for which they are intended and approved.

Abbott's activities conform to the regulatory licenses and approvals we obtain from government agencies such as Ministries of Health, or Food and Drug authorities, to promote, sell, and import pharmaceuticals, medical devices, and other products. We comply with each country's laws and regulations that govern how, where and when we are permitted to promote our products, such as the United States Federal Food, Drug, and Cosmetic Act. We maintain and follow internal policies and procedures designed to ensure compliance with such requirements and with respect to government health care programs.



## WHAT IS ABBOTT'S POLICY ON PRODUCT PROMOTION?

### **Q What do Abbott policies and procedures require with respect to product promotion?**

A One of the key, universal principles related to product promotion is that we may not promote or pre-sell a product that has not yet been approved or cleared by the relevant regulatory

body for the location or usage in question. If a health care professional asks about uses for Abbott products that are beyond the scope of approved labeling (sometimes referred to as "off-label" uses), the inquiry should be directed to the designated function for such inquiries in your division, which normally resides in Medical Affairs.



# 4

## ADVANCING SCIENCE

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We advance science,  
technology, and product  
innovation to work toward a  
healthier future.

### IN THIS SECTION

Innovation

Advancing Science



## INNOVATION

**We innovate and advance health care solutions and product innovations to improve health outcomes around the world.**

We address human needs by pioneering innovative treatments and products, lifesaving medical devices, and new approaches to managing health. We advance leading-edge science, technology, and product innovations to foster improvements to health. Good health is key to our customers maximizing their full potential. We support patients' and consumers' pursuit of health throughout the continuum of life, providing innovative products designed to help people live the healthiest, fullest lives possible. We focus on innovation of products that change lives for the better.

**We foster a culture of innovation, seek new possibilities, and plan for contingencies.**

Our relentless drive toward innovation and new possibilities comes with risk. While we take measured risks that are consistent with this Code and our policies, we should always make efforts to mitigate risks in advance, considering possible outcomes, and plan accordingly.



If you are unsure about the right course of action, follow the steps outlined in the [Decision Making AID](#) section.



## ADVANCING SCIENCE

**We conduct research to obtain and provide objective, accurate data that will advance science.**

We conduct research to advance the science behind our products: to develop new products, improve existing treatments, and advance health care practices.

When we conduct research, we are committed to treating study participants with dignity and respect, and to protecting them from unnecessary risk. We ensure that patients participating in research understand the nature and purpose of the research and the associated risks. Obtaining informed consent from study participants is an essential part of our research process.

We value transparency in scientific research, and will not attempt to improperly influence the outcome of any research or reports made by clinical investigators or other researchers. We recognize the importance of ensuring that data from studies and related analyses are accurate. We are committed to providing research results relating to our products, whether results are positive or negative, in a timely and accurate fashion.

When research is done for Abbott or published on our behalf, we select partners with strong medical and scientific backgrounds. We have high standards for these partners, such as expecting investigators to appropriately disclose their connection to Abbott. When we partner with other scientists or clinicians in connection with research and development work, we are committed to complete and accurate disclosure of financial or other relationships.

**When we conduct research, we are committed to treating study participants with dignity and respect, and to protecting them from unnecessary risk.**





# 5

## OUR PEOPLE

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We value our diverse perspectives as a source of strength.

### IN THIS SECTION

Collaboration

Our Connection to Each Other

Reporting Concerns

Equal Opportunity

Fair Treatment

Work Environment

## COLLABORATION

**We foster a culture of openness, recognizing that diversity of thought and collaboration drive innovation.**

We embrace diversity because we believe that it generates creativity, innovation, and energy. We understand that to make a difference and address a wide spectrum of changing health needs, it takes a relentless drive and a collaborative approach, listening to our colleagues and ensuring that all voices are heard.



## OUR CONNECTION TO EACH OTHER

We all share in the responsibility to live our values every day. By demonstrating and supporting ethical behavior, we positively impact the culture of Abbott. We are all responsible for understanding how this Code applies to our work and the role we perform in the company.

Managers and supervisors, as leaders in the organization, must demonstrate a strong commitment to our values and lead by example. They must always promote and support ethical behavior by employees. Managers must help ensure that employees understand their responsibility to abide by this Code and must foster a work environment that allows employees to feel comfortable asking questions and voicing concerns without fear of retaliation.

**We all share in  
the responsibility  
to live our values  
every day.**

## REPORTING CONCERNS



We ask questions whenever choices or actions related to our work are unclear or do not seem right, and we speak up and report any violations of this Code.

It is up to each of us to ask questions whenever we feel direction is unclear, and to challenge and report any suspected unethical business conduct, violation of this Code, or violation of our policies or procedures.

Asking questions, reporting concerns, and actively pursuing clarity about our choices or actions helps us identify and avoid problems more effectively. When in doubt about the right choices, actions or potential violations, ask a manager or the Office of Ethics and Compliance.

Managers and supervisors have a fundamental responsibility to lead by example and ensure that employees understand and are held accountable to the Code. Those in leadership roles carry heightened responsibility for understanding and communicating Abbott's expectations, and should contact the Office of Ethics and Compliance regarding potential Code violations.

All reports of potential Code violations will be taken seriously and handled appropriately through follow up steps such as investigation, remediation, and where necessary, corrective actions to address issues, learn from mistakes, and avoid recurrence. The Office of Ethics and Compliance will direct any investigation of alleged violations of the Code. You should not conduct any investigation independently. Each of us is required to cooperate in, and maintain the confidentiality of, any such investigation.

## WHY SHOULD I REPORT A CONCERN?

### Q Why should I report a concern?

A We all share in the responsibility to live our values every day. That includes keeping an open dialogue by asking questions when we don't know what to do and reporting concerns related to our business activities. Raising a concern on noncompliance continues our commitment to act ethically in all aspects of our business and fosters a culture of compliance. Your actions can make a difference.

## REPORTING CONCERNS

Corrective actions related to Code violations may include disciplinary action (up to and including termination), or legal action for:

Authorization of or participation in a violation;

Refusal to cooperate in the investigation of an alleged violation;

Failure by a violator's supervisor(s) to detect and report a violation, if such failure reflects inadequate supervision or lack of oversight;

Reporting a concern that is knowingly false, or is intended to threaten, intimidate or retaliate against any person associated with Abbott's business;

Retaliation, such as by intimidating, threatening, harassing or maligning any person who has reported a violation or potential violation in good faith.



Learn more about the policies and procedures related to the Office of Ethics and Compliance: [icomply.abbott.com](https://icomply.abbott.com)



## REPORTING CONCERNS

It is never acceptable to retaliate against anyone who raises concerns about whether business activities are in line with the Code. Alleged retaliation should be reported to the Office of Ethics and Compliance or Human Resources.

Our commitment to the work that we do drives us to not just follow the letter of the laws that apply to our work, but to be mindful of the ethical expectations that come with being a leader in a business like ours.



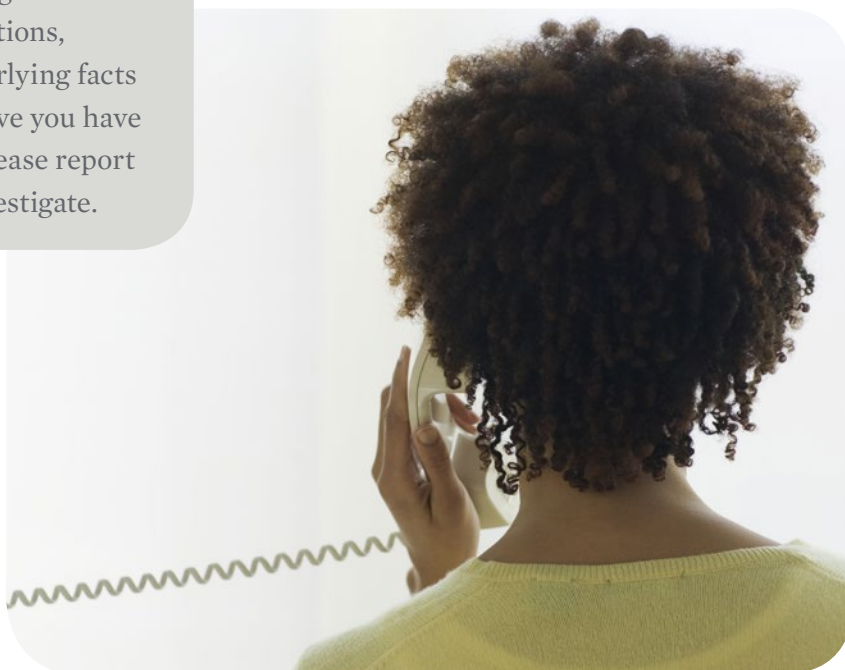
Learn more about the different channels available to ask questions and raise concerns in the Speak Up section.



### WHAT IF I FACE RETALIATION?

#### **Q What if I face retaliation?**

A The company strictly forbids any retaliation against any person who raises a concern. Complaints made in good faith will not expose you to any sanctions, regardless of whether the underlying facts prove to be correct. If you believe you have faced retaliation of any kind, please report it so that the company can investigate.





## EQUAL OPPORTUNITY

### We provide equal opportunities for all employees.

We base employment decisions on business needs, skills, experience, and relative work performance. Abbott prohibits discrimination based on race, color, religion, creed, age, sex, national origin, gender identity or expression, sexual orientation, disability, marital status, veteran or military status, genetics or citizenship status, or any other legally protected status. We are committed to following the laws impacting our relationship with our employees around the world.



Learn more about our diversity and inclusion programs:  
[abbott.com/careers/diversity-and-inclusion.html](https://abbott.com/careers/diversity-and-inclusion.html)

## FAIR TREATMENT

### We strive to ensure that everyone working at Abbott feels welcome, supported, and inspired to succeed.

Abbott cares about and is concerned for the health and well-being of its employees worldwide. Everyone who works at Abbott should encounter a professional environment, free from intimidation and harassment. Abbott encourages input from its employees on ways to enhance the inclusive and diverse atmosphere of its workplaces and promotes a workplace that is free from disruptive conduct by employees.



## FAIR TREATMENT

## We treat everyone with respect and dignity.

Our respect for people is demonstrated in what we do and how we act toward everyone we encounter in our work. To meet our commitments to one another, and to attract, cultivate and retain talented individuals from around the world, it is vital to have a work environment built on mutual trust, respect, and the principles embodied in this Code. We must treat others equitably and not take advantage of others through manipulation, misrepresentation, or concealment.

## WORK ENVIRONMENT

## We take care to ensure workplace safety and appropriate conditions for employees and others who work for us.

Accidents and unsafe situations must be promptly reported to management. We also take steps to prevent and prohibit illegal and inappropriate labor conditions, and cruel or inhumane treatment, in connection with our business activities around the world.



Learn more about our workplace harassment policy: [abbott.sharepoint.com/sites/myhr/GL-EN/English%20Documents/C-111%20Workplace%20Harassment\\_0\\_.pdf](https://abbott.sharepoint.com/sites/myhr/GL-EN/English%20Documents/C-111%20Workplace%20Harassment_0_.pdf)



Learn more about our environmental health and safety program: [abbott.sharepoint.com/sites/abbottworld/EnvironmentalHealthSafety](https://abbott.sharepoint.com/sites/abbottworld/EnvironmentalHealthSafety)





# 6

## OUR COMMUNITIES

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We build trust in Abbott  
as a citizen of each local  
community and the world.

### IN THIS SECTION

Community Involvement

Political Contributions

Environmental Responsibility

## COMMUNITY INVOLVEMENT

## We strive to foster community well-being through our products and our work.

We have a distinguished history of supporting the communities where we live and work. We believe that with good health, communities can thrive. Through our operations, business relations, and support of community groups and charitable causes, we give back to our communities and our neighbors. In communities large and small, wherever we do business, Abbott strives to make a positive and lasting difference in people's lives.



Learn more about our  
global citizenship program:  
[abbott.com/  
responsibility.html](http://abbott.com/responsibility.html)

## POLITICAL CONTRIBUTIONS

## We encourage appropriate engagement in the political process and support community involvement.

Abbott works to support public policy that aligns with our mission and values and, where appropriate, may provide support to political candidates or interest groups. The laws related to political contributions by companies are complex, so it is important that contributions of Abbott funds and any other contributions provided on behalf of Abbott be made only after consultation with the Legal Division.



## ENVIRONMENTAL RESPONSIBILITY

## We engage in sustainable development and endeavor to minimize our impact on the environment.


We are committed to minimizing our global environmental impact, from the responsible sourcing of raw materials to the manufacture, distribution and use of our products.

We take steps to reduce our use of energy and other natural resources. We support projects that generate energy from renewable sources at work and in our communities. We seek ways to reduce the environmental impact of our operations, such as through waste reduction and recycling and other activities to mitigate environmental risks. We adhere to the environmental laws and regulations applicable to our operations.



Learn more about our environmental program:  
[abbott.sharepoint.com/sites/abbottworld/EnvironmentalHealthSafety](https://abbott.sharepoint.com/sites/abbottworld/EnvironmentalHealthSafety)





# 7

## HOW WE OPERATE

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We work together with  
accountability and in keeping  
with Abbott values.

### IN THIS SECTION

Fair Dealing

Avoiding Conflicts of Interest

Protection of Abbott Assets &  
Reputation

Confidential Information

Anti-Bribery

Gifts, Meals and Entertainment

Accurate Books and Records

Compliance with Laws

Fair Competition

Applicability

Waivers and Amendments

## FAIR DEALING

**We conduct business ethically and honestly, and strive to do what we say we will do, in all aspects of our work.**

We are each accountable for our work and decision-making within the realm of our roles and responsibilities.

In all of our professional interactions, with all of the people we encounter in our work – coworkers, customers, suppliers, health care professionals, competitors, and others – we must be fair and straightforward about how Abbott conducts business. This principle of fair dealing is critical.



If you are unsure about the right course of action, follow the steps outlined in the Decision Making AID section.

## AVOIDING CONFLICTS OF INTEREST

**We address and resolve any conflicts of interest before moving forward.**

A conflict of interest exists whenever an Abbott employee's private interests interfere, or appear to interfere, with Abbott's interests. Business decisions should be based on Abbott's needs, rather than potential personal gain or the interests of family or friends. Each of us is expected to use good judgment and to avoid situations that can lead to an actual conflict or the appearance of a conflict.



## AVOIDING CONFLICTS OF INTEREST

If competing actions, interests, or relationships make it difficult to perform your work objectively and effectively, or if you or a family member could receive improper personal benefit as a result of a position with or connection to Abbott, you must disclose the potential conflict of interest in accordance with Abbott's conflict of interest guidelines and excuse yourself from situations where the conflict could impact your business judgment.



Learn more about how to avoid, or disclose and manage, potential conflicts of interest: [speakup.abbott.com](https://speakup.abbott.com)



## IS IT OKAY TO TAKE ON EMPLOYMENT OUTSIDE OF ABBOTT?

**Q I work in Finance and, because of my academic performance, I have always been in contact with the academic world, so a University has contacted me to teach classes on Analysis and Evaluation of Financial Statements. I've discussed with my manager, and we agree that it is a job where the functions are completely independent of those in Abbott; the work schedule does not interfere with my Abbott work and it does not require**

**the disclosure of confidential information from Abbott. Is this a conflict of interest?**

A Because outside employment could pose a conflict of interest, you were correct to disclose the potential conflict of interest and discuss with your manager. After you've consulted with your manager, evaluated the situation together, and determined that the new job does not affect the performance of duties for Abbott, this situation would not be considered a conflict of interest.

## AVOIDING CONFLICTS OF INTEREST

**We place the interests of Abbott above personal interests when making decisions in connection with our work.**

The interests of the greater organization should be prioritized over the interests of a business division, a working group, or an individual in the context of our work.

Our positions at Abbott and opportunities, such as outside business deals or financial interests, made available through work activities, should only be used for Abbott's benefit, and not for personal gain. We should not compete with Abbott or help other individuals or businesses do so. Our priority must be to advance the company's interests when opportunities arise.



## PROTECTION OF ABBOTT ASSETS &amp; REPUTATION

## We are caretakers of our company in our work.

It is our responsibility to protect and use Abbott's assets, from physical property, like vehicles and computer equipment, to intellectual property, trade secrets, and know-how, with care and ensure their efficient and proper use. We must all use good judgment to ensure that Abbott's assets are not lost, stolen, misused, or wasted.

Abbott's reputation is one of its greatest assets. We are each responsible for enhancing and protecting Abbott's reputation. We are each personally accountable for any views or content published or shared with people outside the company.



Learn more about our social media policy:

[abbott.sharepoint.com/sites/crp-irpa/smr](http://abbott.sharepoint.com/sites/crp-irpa/smr)



## CAN I USE MY WORK COMPUTER FOR PERSONAL USE?

**Q Can I use my work computer to do online shopping during the holiday season?**

A Abbott Policy allows employees to use Abbott's computers for this type of personal use as long as it is incidental and does not conflict with work responsibilities. For more information, see Abbott's Electronic Use Policy.

## PROTECTION OF ABBOTT ASSETS & REPUTATION

In external interactions, we need to be mindful of whether we can be identified as affiliated with Abbott, and consider how any statements related to our work may reflect on the company. This is especially crucial in the context of social media where interactions are quick and dynamic and can become highly visible. Careless communications can pose a significant risk to Abbott's reputation. We are all responsible for employing careful communication strategies in our communications and protecting Abbott's confidential information.

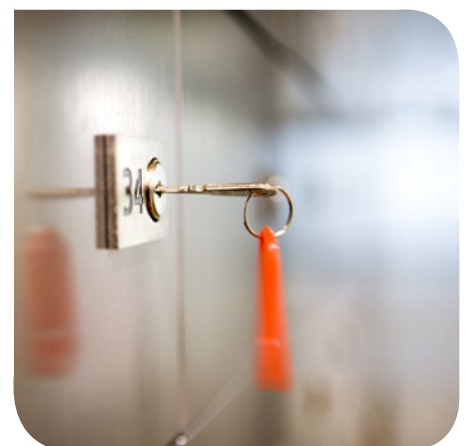


Learn more about our policy on electronic media use: [abbott.sharepoint.com/sites/myhr/GL-EN/English%20Documents/C-118%20Electronic%20Media%20Use.pdf](https://abbott.sharepoint.com/sites/myhr/GL-EN/English%20Documents/C-118%20Electronic%20Media%20Use.pdf)

## CONFIDENTIAL INFORMATION

**We respect and safeguard confidential information, including personal information.**

One of Abbott's most valuable assets is its confidential information. Confidential information is information that is not publicly available and includes research and development projects, trade secrets, business plans, manufacturing formulas and processes, supplier or customer contract terms, pricing, sales figures, bids, quotes, pricing proposals, responses to tenders, and non-public financial results, or any other information that might be of use to Abbott's competitors or harmful to Abbott if disclosed. Each of us must be vigilant to safeguard confidential information and prevent unauthorized disclosure or use. Confidential information should not be shared with competitors. These obligations may extend beyond employment with Abbott.



## CONFIDENTIAL INFORMATION

Similarly, we respect the intellectual property rights of others and will not inappropriately obtain or misuse their confidential information.

Misuse of specific confidential information is prohibited by law, such as laws prohibiting insider trading based on non-public information. Insider trading is both unethical and illegal, and we must not buy or sell securities of Abbott, or of other companies doing or expected to do business with Abbott, based on such information.



Learn more about our policy on Insider Trading: [abbottmfiles.oneabbott.com/Default.aspx?#3E4088E6-D40A-4DA2-90B9-76B55D51A390/object/0/9698/latest](http://abbottmfiles.oneabbott.com/Default.aspx?#3E4088E6-D40A-4DA2-90B9-76B55D51A390/object/0/9698/latest)



## WHAT DO I DO IF I SEND SOMETHING TO THE WRONG PERSON?

**Q What do I do if I have inadvertently sent a list of patient names and email addresses to the wrong external email recipient?**

**A** Patient names and other patient information are considered sensitive information we need to protect. If such information has been compromised in any way, you should follow internal processes to notify relevant internal stakeholders about the incident. You should contact Abbott's Global Service Desk to report this incident.

## CONFIDENTIAL INFORMATION

We respect the privacy of those who entrust their personal information to us, including our colleagues and the people who recommend, prescribe, and use our products. When we collect personal information in the course of our business, we appropriately inform the people whose information we collect about how it will be used, and obtain appropriate consent or authorization. We do not sell personal information or obtain personal information from sources that do not have authorization.

We protect personal and sensitive information from unauthorized disclosure and use. Many locations have strict regulations requiring companies to protect personal information collected and used in the course of business, especially for the most sensitive categories of personal information, and we are committed to understanding and following these requirements.



Learn more about the privacy and data protection requirements for your location: [abbott.sharepoint.com/sites/abbottworld/Legal/GBLPRIV](https://abbott.sharepoint.com/sites/abbottworld/Legal/GBLPRIV)



## HOW DO I RESPOND TO AN INQUIRY FROM THE GENERAL PUBLIC OR PRESS?

**Q What should I do if I receive a call or an inquiry online from someone asking me about the latest news from Abbott? The person who called me seemed very professional, and indicated that he is doing a formal survey across the health care industry about current industry developments. Am I allowed to participate?**

A Providing information that is non-public about Abbott's business could be a problem. Some people contacting Abbott for information of this nature are trying to piece together information from different sources to gain an insider view of what is happening at our company. Until Abbott is ready to publish its results or other information about our business, you should keep information about your work confidential. Be sure to know what is considered confidential and non-confidential with respect to the information related to your work. If you have questions, contact your manager, OEC or Legal. Refer press inquiries to Public Affairs.

## ANTI-BRIBERY

**We actively oppose fraud, bribery, and corruption. We get business the right way.**

As patients, family members and care givers, we want our doctors, nurses and pharmacists to recommend the products and treatments that will best suit our needs, using their professional judgment. Patients and consumers should be able to rely on the independent judgments of their health advisors, without concern that those judgments have been improperly influenced by incentives from companies seeking to promote their products.

As citizens, we want our government officials to make decisions that serve the best interests of the people. Such government decisions should not be improperly influenced by companies seeking favor for their corporate interests through incentives to government officials.

As we market and sell our products, we educate and inform health care professionals, but do not interfere with their independent, professional judgments. It is never permissible to offer or provide anything that directly or indirectly benefits a government official, a health care professional (such as a physician, pharmacist, nurse, researcher or laboratory staff), or any other person, in order to make a sale or secure a business advantage for Abbott. Similarly, it is never acceptable to provide anything of value as a “reward” for any past or existing relationship with Abbott.



## WHAT CONSTITUTES “ANYTHING OF VALUE”?

### Q What constitutes “anything of value”?

A Improper benefits can take many forms, including, but not limited to, cash, gift cards, gifts, travel expenses, entertainment, sponsorships, fake consultancy agreements, employment opportunities, inflated commissions, unauthorized discounts or rebates, and political or charitable donations. If you have questions, contact your manager, OEC, or Legal.



## ANTI-BRIBERY

Anti-bribery, anti-corruption, and “anti-kickback” laws make it especially important that we demonstrate our commitment to preventing improper influence in business transactions in all of our interactions. The U.S. Foreign Corrupt Practices Act and other relevant country laws in these areas potentially apply to Abbott’s activities around the world, and bribery is illegal everywhere.

Everyone at Abbott must proactively manage relationships with service providers (such as distributors, consultants, speakers or promoters) to ensure that services performed on Abbott’s behalf are carried out in accordance with our expectations and in compliance with applicable laws and regulations. We must use due diligence when selecting service providers, pay fair market value for services, and accurately document payments for services, fines, fees and the like.



Learn more about anti-bribery and anti-corruption laws from around the world:

[abbott.sharepoint.com/sites/abbottworld/Legal/anticorr](http://abbott.sharepoint.com/sites/abbottworld/Legal/anticorr)



## WHAT IS THE DIFFERENCE BETWEEN A BRIBE AND A LEGITIMATE PAYMENT TO GET A SERVICE PERFORMED MORE QUICKLY?

**Q How do I tell the difference between a bribe and a legitimate payment to get a service performed more quickly, like when I want to apply for a visa or seek customs clearance on a “fast-track” basis?**

**A** Some differences include the amount of documentation and whether the same option is always available to every applicant. Fees for legitimate “fast-track” options are normally

published, with a set fee, and accompanied by clear, standard documentation such as an application form and receipt from the fee issuing entity. Abbott policies and procedures do not allow “facilitation payments,” which are different from such legitimate “fast-track” options. If you are unsure whether a payment to get services performed more quickly is permitted, you should contact your manager, OEC or Legal.

## GIFTS, MEALS & ENTERTAINMENT

Because anti-bribery principles require that we never offer or provide anything that directly or indirectly benefits any person to secure a business advantage, we set limits surrounding gifts, meals and entertainment. Our policies and procedures related to limits on and reporting of brand reminders, gifts, cultural courtesies, meals and hospitality are in place to help ensure that we do not provide any benefit that could interfere with professional judgment.



### **CAN I OFFER A CULTURAL COURTESY TO A HEALTH CARE PROFESSIONAL?**

**Q During national or religious holidays, are we able to give a health care professional a cultural courtesy?**

A Cultural courtesies related to national or religious holidays may be given in many locations, provided that they are allowed by local procedures and do not exceed monetary limits. You should check your local OEC procedures to determine what items, if any, may be provided.

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We never offer or provide anything that directly or indirectly benefits any person to secure a business advantage.

## GIFTS, MEALS &amp; ENTERTAINMENT



## CAN I ACCEPT A GIFT FROM A SUPPLIER?

**Q I received a gift from a supplier during the holidays, and I am not sure if I can accept it. What should I do?**

A It depends on the nature of the gift, its value, and the culture of the country. If the value of the gift you are receiving is not modest, you should not accept it and return it to the supplier explaining that our policy does not permit employees to receive expensive gifts. On the other hand, if the amount of

the gift is modest and considered reasonable based on the culture of the country, you can accept it, and the best approach is to share it with the employees of the department, if the nature of the gift permits. In both cases, transparency is the key element in such circumstances. Therefore, you should notify your manager about it and, if you have further questions, you should contact Abbott Purchasing.



## CAN I TAKE A HEALTH CARE PROFESSIONAL OUT FOR A BUSINESS MEAL?

**Q While on a business visit to a health care professional, the sales representative is asked by the health care professional if they can discuss the business topics over lunch. Is this permissible according to our Code of Conduct?**

A In most countries, having a meal with a health care professional in conjunction with a business conversation is permissible. You should check your local OEC procedures for requirements and monetary limits.

## ACCURATE BOOKS AND RECORDS

### We measure achievements accurately.

Our financial books, internal records and documentation, and public statements must accurately reflect the substance and facts of our actions. When we are measuring or describing our successes, failures, and routine operations, the facts must be presented in sufficient context and with adequate support to understand the true nature of our activities or transactions. Our financial records must conform to applicable accounting standards, laws and regulations, as well as Abbott's policies, procedures and controls.

When we report information, such as pricing or payments and items of value provided to physicians and other customers, the information must be complete and accurate. Many governments around the world have strict laws regarding price reporting and reporting of certain payments to health care professionals. These laws help protect taxpayers, who ultimately pay for some or all of the purchases within the health care system. Abbott is committed to ensuring that we provide accurate information to allow governments, insurers and other stakeholders to make informed decisions.



### WHAT SHOULD I DO IF I BECOME AWARE OF A FINANCIAL IRREGULARITY?

**Q** What do I do if I become aware that someone has created an “unofficial” separate account that has not been reported to Finance?

**A** You should report this to OEC, Legal or Finance so that it can be reviewed.

## COMPLIANCE WITH LAWS

## We adhere to all laws, regulations and Abbott requirements that apply to our work.

Every Abbott employee is expected to adhere to all laws and Abbott's policies, procedures, principles and standards, including this Code. This is a fundamental expectation and condition of employment. Abbott's policies and procedures cover topics related to important aspects of our operations, including health care compliance, quality, engineering, customs and trade, finance, security, purchasing, human resources, and information systems, to help ensure that we comply with the many laws and regulations governing our business. Such policies and procedures enable us to detect, correct and prevent non-compliant activities.

As employees of a global company, we must keep in mind that the laws of one country may apply to the way we work in other countries. We must be mindful of the requirements for each location, and seek guidance from the Legal Division or the Office of Ethics and Compliance whenever we face a question about which requirements apply.



Learn more about our corporate policies: [abbott.sharepoint.com/sites/abbottworld/GlobalPolicy](https://abbott.sharepoint.com/sites/abbottworld/GlobalPolicy)



### WHAT LAWS AM I SUPPOSED TO FOLLOW?

**Q** There are so many laws around the world and in my country, how can I possibly know which ones I need to follow and what they say?

A Abbott's policies and procedures are regularly updated to accurately reflect the changes to law. Be sure to follow all relevant policies and ask OEC or Legal if you have questions.

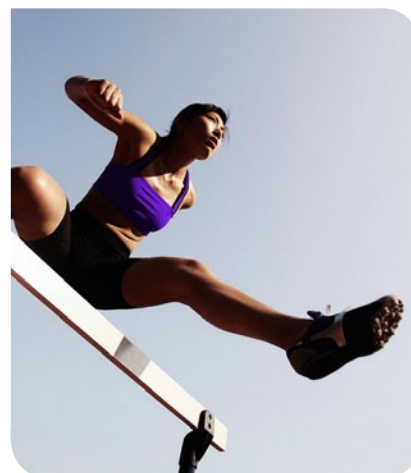


## FAIR COMPETITION

### We ensure that any interactions that we have with competitors are appropriate.

We must compete aggressively in the marketplace to best serve our customers' needs and enhance shareholder value. In doing so, we will not engage in agreements or activities that unfairly limit competition. We are committed to complying with competition laws in every country where we do business. These laws prohibit agreements that eliminate or discourage competition and apply to many aspects of our business, including relationships with competitors, prices and terms of sale to distributors and other customers and marketing and trade practices. Competition laws are very complicated and penalties for violation may include high fines and even imprisonment. It is important that you do not engage in any activity that could be viewed as anticompetitive, and consult with Legal or the Office of Ethics and Compliance if you have questions.

We must always exercise caution when interacting with competitors. You should not discuss sensitive business topics such as prices, sales terms, business or marketing plans, margins, costs, production capacity, inventory levels or discounts with competitors. You should contact Legal or the Office of Ethics and Compliance for specific guidance about the laws relating to your interactions with competitors and to report any inappropriate conversations with competitors.



## APPLICABILITY

This Code applies to all officers and employees of Abbott, in all locations where Abbott's divisions and affiliates operate around the world. This document sets forth the actions expected from all of us, including outside entities acting on Abbott's behalf, whenever conducting business for Abbott; it is not a contract of employment.

## WAIVERS AND AMENDMENTS

Abbott will make public disclosure, to the extent required by applicable laws, rules and regulations, of any waivers of, or amendments to, this Code.

Any waiver of this Code for a person covered by this Code may be made only by the Chief Executive Officer (or designee), except that a waiver for an Executive Officer requires approval by the Audit Committee of the Abbott Board of Directors.



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**This Code applies to all officers and employees of Abbott around the world.**



# 8

# RESOURCES

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## IN THIS SECTION

Decision Making AID

Speak Up

Other Important Resources





## DECISION MAKING AID

You will at times be faced with situations where the right course of action is hard to determine. Our decision making AID will help you ask the right questions to define a course of action that supports Abbott's values.

# A

### ASSESS the course of action

Is it legal?

Does it comply with Abbott policy?

Does it align with Abbott values and culture?

# I

### Evaluate the possible IMPACT

How will this affect the patients and consumers of Abbott?

Could this affect Abbott's reputation? Would you be concerned if this appeared in the news or headlines?

Could this have an impact on any of Abbott's other stakeholders?

# D

### DECIDE

If you feel confident your decision balances the interests of all stakeholders, proceed.

If you are still unsure about the right course of action, consider alternatives, speak to your manager, the Office of Ethics and Compliance, Human Resources, and/or the Legal Division.

Check out our interactive Decision Making AID:  
[abbott.sharepoint.com/sites/abbottworld/EthicsCompliance/cobc/Pages/Decision-Making-Aid.aspx](http://abbott.sharepoint.com/sites/abbottworld/EthicsCompliance/cobc/Pages/Decision-Making-Aid.aspx)



## SPEAK UP

We offer several channels where you can ask questions and raise concerns. To learn more about our reporting program, visit [speakup.abbott.com](https://speakup.abbott.com).

### ASKING QUESTIONS

If you have a question about your specific obligations, talk to your manager, OEC, HR, or Legal.

### RAISING CONCERNS

Visit our multilingual Ethics and Compliance Helpline available globally 24/7 to voice your concerns about a potential violation of our company's values and standards of conduct ([speakup.abbott.com](https://speakup.abbott.com)).

You can also email [investigations@abbott.com](mailto:investigations@abbott.com) to report a potential violation.





## OTHER IMPORTANT RESOURCES

### MANAGER OR SUPERVISOR

If you have questions on how our Code of Business Conduct applies to your specific job role, the best place to start is with your immediate manager or supervisor.

### ABBOTT CORPORATE POLICY PORTAL

For our corporate policies and procedures applicable companywide, visit the Abbott Corporate Policy Portal ([abbott.sharepoint.com/sites/abbottworld/GlobalPolicy](http://abbott.sharepoint.com/sites/abbottworld/GlobalPolicy)).

### OFFICE OF ETHICS AND COMPLIANCE (OEC)

The OEC is a corporate resource available to address your questions or concerns about our company's values and standards of conduct.

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**OEC Website**– Refer to the OEC website for answers to a variety of ethics and compliance questions. Our company's global and country-specific OEC policies and procedures can also be accessed from the website ([abbott.sharepoint.com/sites/abbottworld/EthicsCompliance](http://abbott.sharepoint.com/sites/abbottworld/EthicsCompliance)).

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**OEC Contacts**– You are encouraged to contact the OEC at any time with any ethics and compliance questions, or to discuss concerns about possible violations of our written standards, laws, or regulations.

**Corporate OEC**– Call 1-224-667-5210 or email [oecc@abbott.com](mailto:oecc@abbott.com) with any questions related to ethics and compliance at Abbott.

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**Divisional or Country OEC**– Your divisional or country OEC representative can provide additional guidance on divisional or country-specific OEC policies, procedures, and guidelines ([icomply.abbott.com/Apps/ComplianceContacts](http://icomply.abbott.com/Apps/ComplianceContacts)).

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## OTHER IMPORTANT RESOURCES

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**Ethics and Compliance Helpline**– Visit our multilingual Ethics and Compliance Helpline available globally 24/7 to voice your concerns about a potential violation of our company’s values and standards of conduct. You can also email [investigations@abbott.com](mailto:investigations@abbott.com) to report a potential violation ([speakup.abbott.com](http://speakup.abbott.com)).

Abbott does not tolerate retaliation against anyone who makes a good-faith report regarding a potential violation of our written standards. In any good-faith report, anonymity is allowed, non-retaliation is ensured, and confidentiality is preserved.

**iComply**– Visit iComply to access compliance-related applications and resources geared towards interactions with Health Care Professionals and Health Care Organizations, as well as third parties ([icomply.abbott.com](http://icomply.abbott.com)).

## HUMAN RESOURCES

For employee-related issues, such as concerns involving management and/or other employees, contact your local Human Resources representative ([myhr.abbott.com](http://myhr.abbott.com)).

## LEGAL DIVISION

If you have questions about the laws, regulations, and acceptable business practices, the Legal Division can assist you ([abbott.sharepoint.com/sites/abbottworld/Legal](http://abbott.sharepoint.com/sites/abbottworld/Legal)).



## OTHER IMPORTANT RESOURCES

### OTHER RESOURCES

There are many other resources available to you:

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**Finance** –If your question is about accounting or finance, contact your local Finance department.

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**Corporate Audit** –If you have specific concerns regarding accounting, internal accounting controls, or auditing matters, promptly report them to Corporate Audit or the OEC.

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**Abbott Quality and Regulatory** –If you have questions about the quality and safety of our products, contact your local Quality and Regulatory department.

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**Global Environmental Health and Safety** –Contact a Global Environmental Health and Safety representative if you have questions about a physical site and potential dangers.

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**Global Purchasing Services** –If you have questions about supplier relations, contact Global Purchasing Services.

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