CODE OF BUSINESS CONDUCT

SAFEGUARDING

trust

ABBOTT LABORATORIES

Dear Colleague:

At Abbott Laboratories, we earn our reputation every day. It is the result of individual decisions made by employees, in matters large and small. As our business and the world around us grow more complex, there are times when the right choice seems neither simple nor apparent. Yet, at all times our actions must be guided by a clear understanding of legal and regulatory requirements, our policies and procedures, and shared ethical principles and values.

These basic guidelines are spelled out in this updated "Code of Business Conduct." All Abbott officers, employees, contract workers and agents are required to read, understand and abide by the standards of this Code. The Code makes it clear that we do not tolerate illegal or unethical behavior in any of our business dealings. I urge you to discuss any questions you may have about interpreting or applying the Code with your manager or members of our Office of Ethics and Compliance, who can provide assistance and guidance. These and other resources are described in this booklet.

The communication of this Code is part of our ongoing effort to ensure a workplace and workforce that are fully committed to honesty, fairness and integrity. Such ethical conduct honors Abbott's 115-year legacy of making a positive difference in the health of people around the world.

I thank you for safeguarding the trust others have placed in us through your efforts to make the right decisions every day.

Miles D. White
Chairman of the Board and Chief Executive Officer

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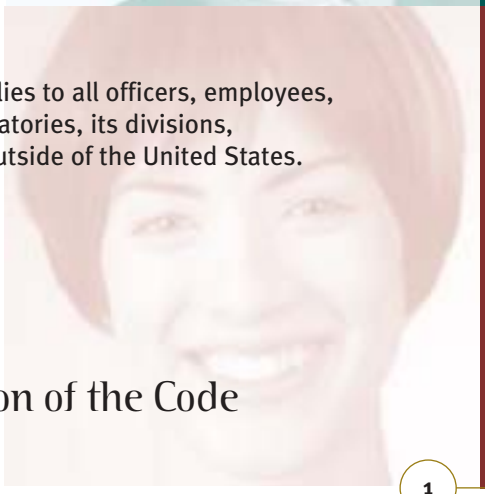
This Code of Business Conduct applies to all officers, employees...

ABBOTT LABORATORIES
CODE OF BUSINESS CONDUCT

I. Applicability

This Code of Business Conduct ("Code") applies to all officers, employees, contract workers and agents of Abbott Laboratories, its divisions, and affiliates, whether operating inside or outside of the United States.

This Code is not a contract of employment.



II. Decision-Making; Operation of the Code

Core Values

The world of business grows more and more complex and fast-paced, and it is harder to make good decisions and take the right actions. But Abbott's long-term success clearly depends upon the choices we make every day. Therefore, it is critical that we all understand and meet Abbott's expectations as to the way we behave in our business at all times.

First, we must base our decisions and actions on our core values of honesty, fairness and integrity.

- We will not tolerate fraud, deceit or concealment.
- Our decisions must be based on fact and fairness, not bias or prejudice.
- Our decisions must be based on strict principles of right and wrong as defined by the Principles set forth in this Code.

ETHICS AND COMPLIANCE HELPLINE
1-866-384-2756

Abbott's long-term success clearly depends upon the choices we make every day.

Compliance with Code

Second, we all must comply with this Code, which is intended to support us in making good decisions and taking the right actions, to help keep us from doing the wrong thing, and to help us comply with the laws, rules and regulations that apply to our business.

- We are all expected to understand how this Code applies to our own jobs and business decisions and activities – or if we don't understand, we must get help with our questions. (Pages 4 – 5 indicate where to go with questions or concerns.)
- All persons covered by this Code are expected to demonstrate integrity and leadership by complying with the Code themselves, and promoting compliance by others.
- Promotion of, and adherence to, this Code are elements in evaluating the performance of everyone to whom this Code applies.

Abbott contract workers and agents (for example, consultants, contract sales forces, speakers, distributors, clinical investigators, etc.) must also comply with the applicable Principles of this Code. That is why, whenever we enter into a new contract or personal service agreement with a contract worker or agent, or whenever we renew or extend an existing contract or agreement, we must include appropriate compliance provisions. (Work with the Abbott Legal Division and Abbott Purchasing to make sure the appropriate provisions are included.)

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Disclosure Program

Third, Abbott recognizes that many decisions are not easy. So, any time we have a difficult decision to make, or we don't understand how the Code applies in a particular case, we should ask for advice and guidance. If we become aware of any violations or potential violations of the Code, or if we have complaints or concerns regarding accounting, internal accounting controls, or auditing matters, we must promptly notify the appropriate persons as indicated on page 5.

- For any questions or concerns about interpreting or applying this Code, or any related Abbott standard, policy or procedure, contact:
  (1) Your manager;
  (2) Another manager;
  (3) A Human Resources representative;
  (4) An attorney in the Legal Division;
  (5) Your Division's Divisional Ethics and Compliance Officer;
  (6) The Vice President and Chief Ethics and Compliance Officer, or the Divisional Vice President, Ethics and Compliance; or
  (7) The Ethics and Compliance Helpline (see contact information on page 5).

- To contact the Vice President and Chief Ethics and Compliance Officer, who manages the Office of Ethics and Compliance ("OEC"):

  Telephone: **1-847-937-5210**
  Fax: **1-847-935-3969**
  E-mail: **OEC@abbott.com**

  Address written communications to the Vice President and Chief Ethics and Compliance Officer, other than faxes and e-mails, to:

  Vice President and Chief Ethics and Compliance Officer
  Abbott Laboratories, Dept. 036X, Bldg. AP6A/1
  100 Abbott Park Road
  Abbott Park, Illinois 60064-6008, USA

  Clearly mark the envelope with the following phrase:
  "CONFIDENTIAL – TO BE OPENED BY THE VICE PRESIDENT AND CHIEF ETHICS AND COMPLIANCE OFFICER".

  Mark e-mails "CONFIDENTIAL"

ETHICS AND COMPLIANCE HELPLINE
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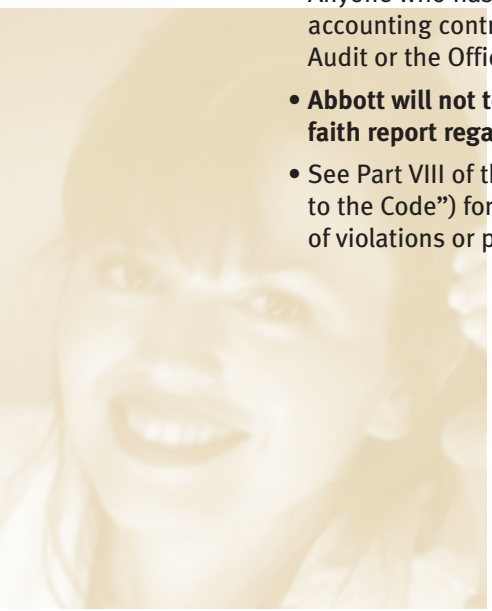
- The Ethics and Compliance Helpline is available 24 hours a day, 7 days a week. Calls to the Helpline may be made anonymously. To access the Helpline:

  (1) From the United States, Puerto Rico or Canada, dial 1-866-384-2756.

  (2) In all other countries, contact the local AT&T USA Direct Operator and then dial or request the operator to dial 1-866-384-2756.

  If you have any problems with the toll-free number, place a collect call to 1-847-937-5210.

- Anyone who becomes aware of a violation, or potential violation, of this Code or any related Abbott standard, policy or procedure, must promptly notify the Office of Ethics and Compliance, either directly or through one of the contact alternatives listed on page 4. Such notification may be made anonymously. Any reports or concerns are kept confidential to the extent possible while still allowing Abbott to investigate and take appropriate action.
- Anyone who has a complaint or concern regarding accounting, internal accounting controls, or auditing matters must promptly notify Internal Audit or the Office of Ethics and Compliance.
- **Abbott will not tolerate retaliation against anyone who makes a good faith report regarding a violation or potential violation of the Code.**
- See Part VIII of this Code on page 29 ("Accountability for Adherence to the Code") for more information on how Abbott handles reports of violations or potential violations of the Code.



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We must not take unfair advantage of anyone...

III. Honest and Ethical Conduct

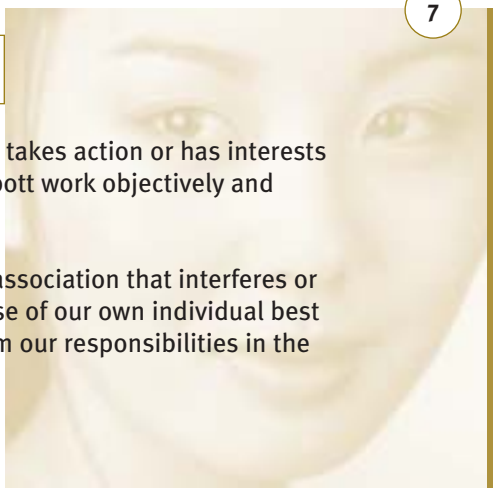
PRINCIPLE 1: FAIR DEALING

We will deal honestly and ethically with Abbott and with Abbott's customers, suppliers, competitors, employees and other stakeholders.

We will deal honestly and ethically with Abbott and on Abbott's behalf in all matters.

We will treat people fairly. We must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged or otherwise undisclosed information, misrepresentation of material facts or any other unfair-dealing practices.

PRINCIPLE 2: AVOIDING CONFLICTS OF INTEREST



A conflict situation can arise when one of us takes action or has interests that may make it difficult to perform our Abbott work objectively and effectively.

We must avoid any investment, interest, or association that interferes or might interfere with the independent exercise of our own individual best judgment, and with our obligation to perform our responsibilities in the best interests of Abbott.

We will avoid actual or apparent conflicts with Abbott's interests.

For example:

(1) We will deal with all suppliers, customers, and all other persons doing business with Abbott in a completely fair and objective manner without favor or preference based upon personal financial or relationship considerations.

(2) We will not accept from or give to any supplier, customer, or competitor any gift or entertainment except as allowed under "Gifts, Meals and Entertainment" on page 9.

(3) We will not do business on behalf of Abbott with a member of our household or a close relative, unless the transaction is disclosed, in writing, to the Office of Ethics and Compliance, which determines that the transaction is on arms-length terms and is consistent with the purposes of this Principle.

A close relative would include, for example, at a minimum, a spouse, domestic partner, parent, parent-in-law, sibling, sibling-in-law, child or son/daughter-in-law, or stepparent, stepsibling, or stepchild.

(4) We will not, directly or indirectly, have a financial interest in any firm or company which is a competitor of Abbott if such financial interest represents a material percentage of the total net worth of the officer or employee, or if such ownership creates a direct conflict of interest for the officer or employee in connection with work the officer or employee is performing for Abbott.

(5) We will not, directly or indirectly, have a financial interest in or hold any employment, managerial, directorial, consulting or other position with any firm or company which does or seeks to do business with Abbott, if such interest or position may influence any decision that we might make in the performance of our regular duties.

We must disclose to the Corporate Officer responsible for our function the existence of any such interest or position, whether actual or proposed. The Corporate Officer will review such case with the Office of Ethics and Compliance, and they will determine whether the existence of such interest or position is or may be in conflict with this Principle or otherwise detrimental to the best interest of Abbott or any of its operations. If they determine that such conflict or detrimental effect may occur, such steps as are necessary to correct the situation will be immediately taken.

(6) Loans from Abbott to, or guarantees by Abbott of obligations of, officers and employees and their respective household members and close relatives may create conflicts of interest. United States law prohibits personal loans from public corporations to directors and executive officers.

PRINCIPLE 3: ABBOTT OPPORTUNITIES

When presented with opportunities related to Abbott's business interests, we must first offer those opportunities to Abbott. We will not: (a) take for ourselves personally, or for members of our household or close relatives, opportunities that are discovered through the use of Abbott property, information or position; (b) use Abbott property, information, or position for personal gain; or (c) hold any employment, managerial, directorial, consulting or other position with any firm or company which is a competitor of Abbott.

We will advance Abbott's business interests when the opportunity to do so arises.

PRINCIPLE 4: GIFTS, MEALS AND ENTERTAINMENT

We will not seek, accept, offer, promise, or give (directly or indirectly) anything of value—including payments, fees, loans, services, entertainment, favors or gifts—from or to any person or firm as a condition or result of doing business with Abbott.

We will comply with Abbott's standards, policies and procedures regarding gifts, meals and entertainment.

Subject to that general prohibition and to the additional policies and procedures referred to on page 10:

(1) Abbott's policy is intended to permit gifts of reasonable value, normal business meals and entertainment, the exchange of customary reciprocal courtesies between employees of Abbott and their business associates, and similar customary and reasonable expenditures to promote general business goodwill; and

(2) Reasonable expenditures for gifts to, meals for, and the entertainment of business contacts may be made if the expenditures are appropriate and are correctly recorded on the books of the paying entity.

Additional policies and procedures apply in certain situations, such as the following:

For gifts, meals and entertainment involving **suppliers**, see Abbott's Corporate Purchasing Policies.

For gifts, meals and entertainment involving **health care professionals and other customers**, see the Divisional Operating Procedures for Program Funding (formerly "Operating Guidelines for Program Funding") in the United States and Puerto Rico, and local policies and procedures in other countries.

For gifts, meals and entertainment involving **government officials or employees**, this Principle is subject to the provisions of "Laws Relating to Payments to Government Officials/Employees" on page 19, as well as the Divisional Operating Procedures for Program Funding in the United States and Puerto Rico, and local policies and procedures in other countries.

PRINCIPLE 5: ACCURACY AND INTEGRITY OF BOOKS, RECORDS AND ACCOUNTS

All Abbott books, records and accounts must accurately reflect the nature of the transactions recorded.

We will ensure the accuracy and integrity of Abbott's books, records and accounts.

Books and records include but are not limited to ledgers, vouchers, bills, invoices, time sheets, expense reports, payroll and benefits records and other essential company data.

All assets and liabilities of Abbott must be properly recorded in the regular books of account.

No undisclosed or unrecorded fund or asset shall be established in any amount for any purpose.

No transaction or arrangement shall be structured to circumvent Abbott's internal control system.

No false or artificial entries shall be made for any purpose.

No payment shall be made, nor purchase price agreed to, with the intention or understanding that any part of such payment is to be used for any purpose other than that described in the document supporting the payment.

With respect to reporting of complaints or concerns regarding accounting, internal accounting controls, or auditing matters, see pages 4 – 5.

PRINCIPLE 6: PROTECTION OF CONFIDENTIAL INFORMATION OF CUSTOMERS AND OTHERS

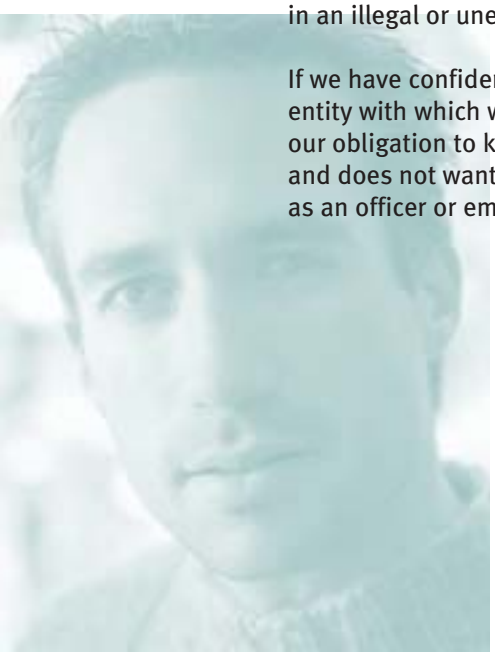
We must not accept non-public information provided by a customer, supplier or other party with the condition or understanding that it be kept confidential unless such information is subject to a written confidential disclosure agreement or confidentiality provision drafted or approved by the Legal Division.

We will protect the confidential information of customers, suppliers and other parties which we receive in the course of conducting Abbott business.

We must maintain the confidentiality of information entrusted to Abbott by a customer or other third party, except when disclosure is legally mandated as determined by the Legal Division.

We must not seek or accept confidential information of or about a competitor in an illegal or unethical manner.

If we have confidential information about a former employer or any other entity with which we were previously affiliated, we are expected to abide by our obligation to keep such information confidential. Abbott will not require and does not want us to use or disclose such information in our capacity as an officer or employee of Abbott.



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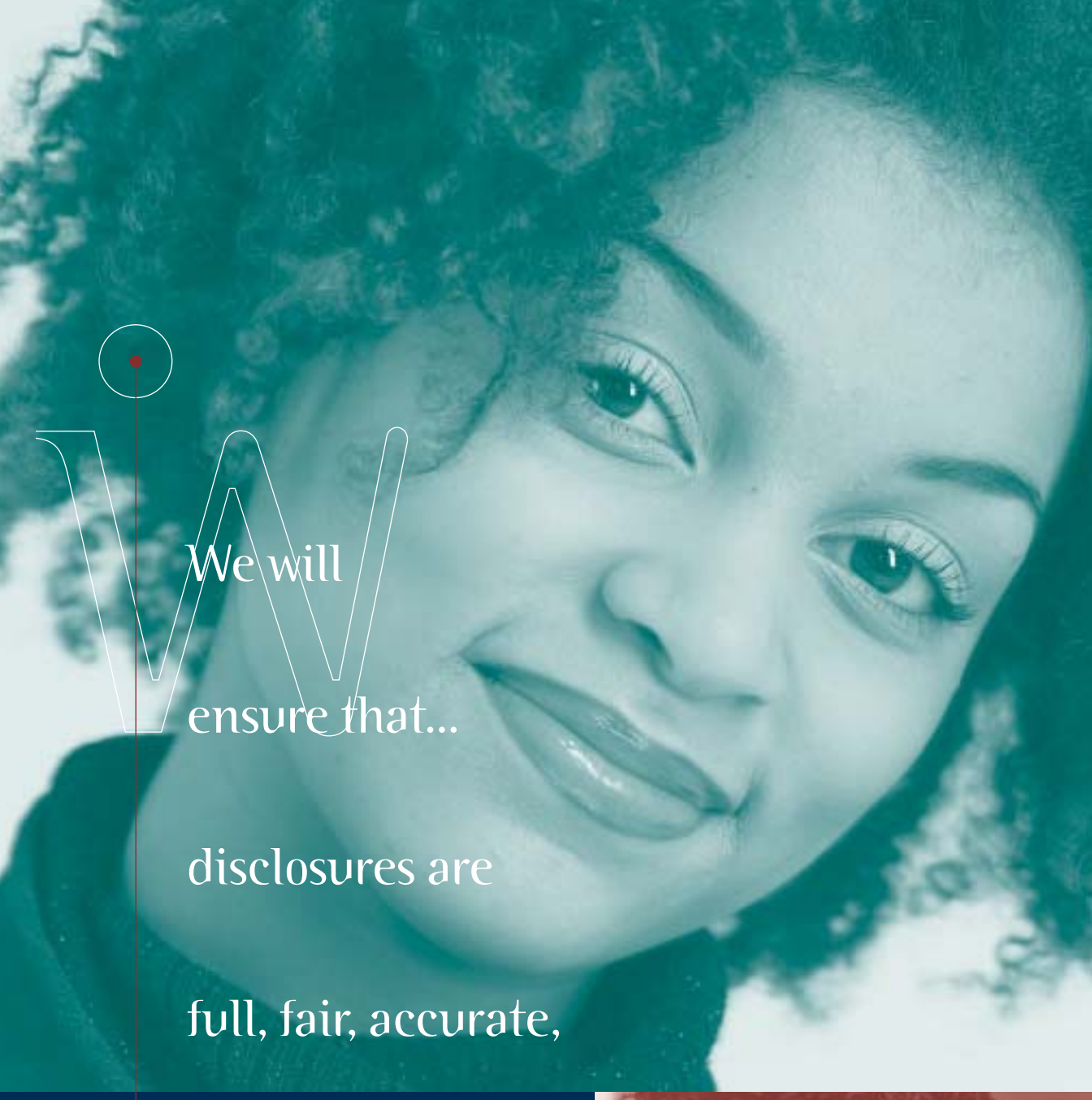

We will

ensure that...

disclosures are

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timely and

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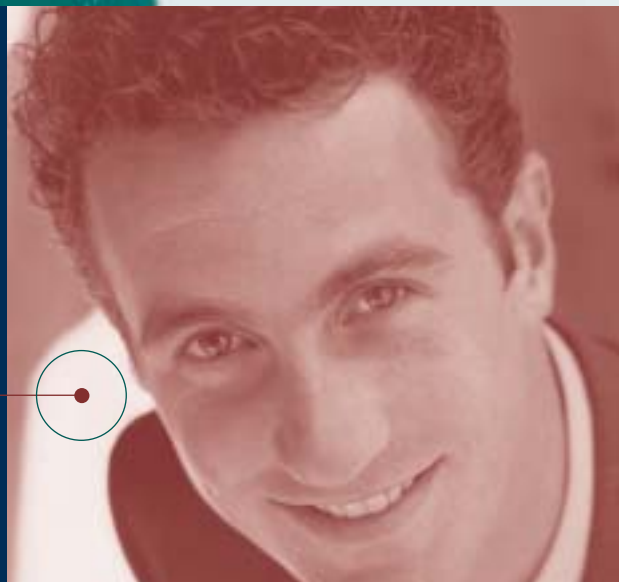


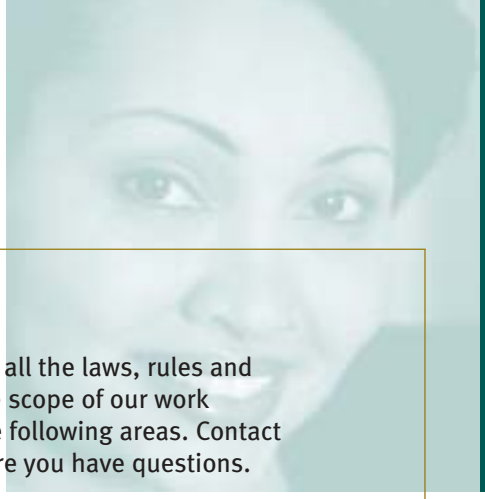
IV. Public Disclosures

PRINCIPLE 7: FULL, FAIR, ACCURATE, TIMELY AND UNDERSTANDABLE DISCLOSURES

We will ensure that, in all reports and documents filed with or submitted to the United States Securities and Exchange Commission by Abbott and in other public communications made by Abbott, Abbott's disclosures are full, fair, accurate, timely and understandable.

We will ensure that Abbott's public disclosures comply with all applicable securities laws, including all applicable financial reporting and accounting regulations. Strict compliance with Corporate and Divisional accounting policies and procedures is required, as is full cooperation with internal and external auditors.

We will comply with all applicable legal requirements



V. Compliance with Laws

PRINCIPLE 8: COMPLIANCE WITH LAWS

We are required to familiarize ourselves with all the laws, rules and regulations that apply in the areas within the scope of our work responsibilities, including, as applicable, the following areas. Contact the Legal Division for advice in any area where you have questions.

Food and Drug Laws

We must comply with all applicable laws, rules, regulations, consent decrees and other orders of the United States Food and Drug Administration and any other similar governmental authorities in other countries where Abbott does business governing research, development, manufacture, distribution and promotion of foods, drugs, medical devices, diagnostic products, nutritional products or biological products.

We will comply with all laws, rules and regulations applicable to our work responsibilities in every country in which Abbott does business.

We must comply with all applicable requirements regarding the proper uses and tracking of drug samples, including the United States Prescription Drug Marketing Act and similar applicable laws, rules and regulations in other countries where Abbott does business.

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Laws Relating to Government Health Care Programs

We must comply with the laws relating to government health care programs in each country where Abbott does business.

In the United States, its territories and possessions, and Puerto Rico, many Abbott products are reimbursed or purchased by Federal Health Care Programs – programs that include Medicare, Medicaid, Department of Defense and Department of Veterans Affairs health care programs, and many other Federal or Federally-funded programs that pay for health care items and services. These programs are regulated through a variety of laws affecting the coverage and reimbursement of Abbott products, as well as the sale and marketing of those products.

Abbott is committed to full compliance with all Federal Health Care Program requirements, including the following:

Federal Anti-kickback Statute

The laws that regulate these programs include the Federal anti-kickback statute, which applies both to our sales and marketing activities and to a broad range of other activities, including grants, research contracts, and consulting agreements. It generally prohibits offering or paying (or soliciting or receiving) cash or other benefits to induce the purchase, order, or recommendation of products eligible for payment by a Federal Health Care Program.

The statute is aimed at fraudulent or abusive practices that could encourage overutilization, otherwise increase Federal Health Care Program costs, or bias treatment decisions by health care providers. But even normal business practices (discounts, for example) can sometimes violate the statute if they fall outside its “safe harbors”, particularly if they lack appropriate safeguards. To ensure Abbott’s compliance with the anti-kickback statute, we must carefully evaluate and properly structure any arrangements with parties in a position to prescribe, purchase or recommend Government-reimbursed products (for example, physicians, hospitals, nursing facilities, HMOs, PBMs, GPOs, or pharmacies), and must always avoid any arrangements that could inappropriately influence treatment or purchasing decisions.

False Claims Laws

The civil False Claims Act and other statutes prohibit knowingly or recklessly submitting false claims to the Government, or causing others to submit false claims. Accordingly, we must exercise care to ensure that we do not submit any inaccurate or otherwise improper claims for payment to the Government, or cause others to do so. Abbott contracts with Government customers and must avoid submitting any claims for payments not properly due. While Abbott does not itself submit claims to insurance programs like Medicare and Medicaid, many of our customers do. We must avoid any conduct that could lead customers to submit false claims by following procedures carefully designed to ensure that any information we provide to customers about Medicare or Medicaid reimbursement for our products is accurate and otherwise proper.

Price Reporting Obligations

Further, Abbott must fulfill certain price reporting obligations in connection with Federal Health Care Programs. These price reporting obligations include reporting Medicaid drug rebate figures (the "Average Manufacturer Price" and "Best Price") to the Centers for Medicare and Medicaid Services; reporting "Federal Ceiling Price" figures for drugs to the Department of Veterans Affairs; and reporting specified pricing data to Federal customers when negotiating and performing Federal Supply Schedule contracts. In all such cases, we must calculate and report the relevant pricing information in accordance with the rules governing the particular program – starting from accurate net prices that are not distorted by any "hidden" or "off-invoice" discounts. All price concessions to purchasers must be identified as such and appropriately reflected in reported prices.

Civil Monetary Penalties Law

This law authorizes the imposition of civil monetary penalties for a variety of conduct. For example, it prohibits employing or contracting with parties excluded from participation in Federal Health Care Programs.

Failure to adhere to Federal Health Care Program requirements, or to related Abbott standards, policies and procedures, can have a number of serious consequences, both for Abbott and for the individuals involved. The violation of legal requirements governing Federal Health Care Programs can potentially result in civil suits or criminal prosecutions under a number of Federal and State statutes. Any violation of these laws can subject both Abbott and individuals to administrative, civil, or even criminal fines and penalties. Of course, such violations may also result in employee disciplinary action, which may, when appropriate, include dismissal. In addition, violation of these laws may result in exclusion of Abbott or individual employees from participation in Federal Health Care Programs.

Abbott expects each of us to be familiar with, and to comply with, the relevant Federal Health Care Program requirements applicable to your job, and to be familiar with, and to comply with, all Abbott standards, policies and procedures – both Corporate and Divisional – implemented to promote compliance with the Federal Health Care Program requirements. At the Corporate level, see Corporate Policy No. CP-01, and related Office of Ethics and Compliance Policies.

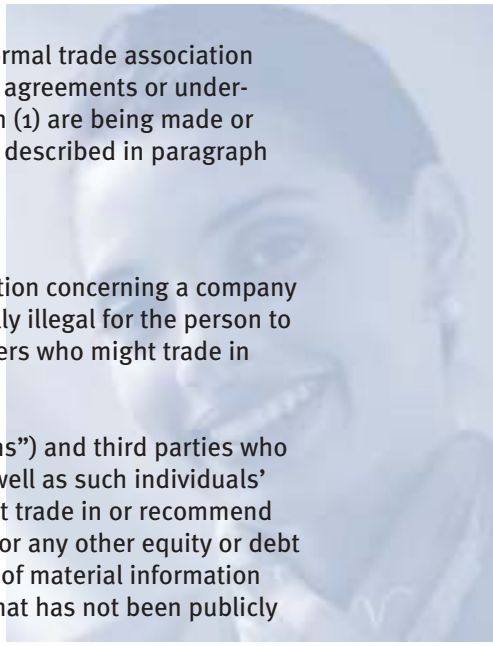
Antitrust and Competition Laws

When we are dealing with competitors, the following policies shall apply:

(1) We must not enter into any agreement or understanding that has the purpose or effect of improperly restraining competition. Illegal agreements or understandings among competitors include price fixing, market allocation, and bid rigging.

(2) We must not exchange, discuss, or benchmark with any competitor information relating to Abbott prices or pricing policies, distribution policies, supplier pricing or selection, customer selection or classification, credit policies, advertising policies or any other similar competitive information.

(3) We must not participate in any formal or informal trade association or other meetings with competitors at which agreements or understandings of the type described in paragraph (1) are being made or at which competitive information of the type described in paragraph (2) is being exchanged or discussed.



Insider Trading Laws

If a person possesses material non-public information concerning a company that issues publicly-traded securities, it is generally illegal for the person to trade in securities of that company or to "tip" others who might trade in such securities.

All persons covered by this Code ("covered persons") and third parties who are in a confidential relationship with Abbott (as well as such individuals' household members and close relatives), shall not trade in or recommend the purchase or sale of Abbott's common shares (or any other equity or debt securities of Abbott) while they are in possession of material information regarding the operations or prospects of Abbott that has not been publicly disclosed and disseminated.

Covered persons shall also similarly abstain from trading in, or recommending the purchase or sale of the securities of any other company that issues publicly-traded securities of which they have obtained material non-public information as a result of their employment by or affiliation with Abbott.

Covered persons shall not disclose any such material non-public information to third parties except when done for valid business purposes (and covered by an appropriate confidential disclosure agreement). In such cases the covered persons must have no reason to believe the information will be misused or the disclosure might otherwise violate Federal securities laws.

United States securities laws prohibit selective disclosures of material non-public information to third parties who are not bound by confidentiality agreements or certain confidential relationships to preserve the confidentiality of such information. Covered persons should consult with the Legal Division before making disclosures to third parties that might constitute selective disclosure or if they believe a selective disclosure may have already been made by inadvertence or otherwise.

"Material information" is information which, if publicly disclosed, could reasonably be expected to affect the market value of a company's securities or to influence a reasonable investor's decisions with respect to those securities. Specific examples of material information include generally unanticipated changes in revenues, annual and quarterly earnings or dividend rates, significant write-offs or significant increases in reserves, public offerings of any Abbott securities, significant acquisitions or dispositions, joint ventures, proposed tender offers or stock splits, and senior management changes. Information regarding major new product developments, collaborations, suppliers, customers, contract awards or terminations, expansion plans, or significant litigation or regulatory proceedings may also fall in the category of material information.

To prevent violations of these laws and avoid even the appearance of impropriety, Abbott may impose "blackout periods" during which certain covered persons should not engage in any transactions involving Abbott's securities. Affected covered persons will be notified of any such blackout period.

The foregoing restrictions are not intended to prevent covered persons from buying or selling securities pursuant to properly established and administered "Rule 10b5-1 Plans" which may be used to permit trading pursuant to certain kinds of prearranged plans even if a person subsequently comes into possession of material non-public information. Contact the Legal Division to establish such a Plan.

Laws Relating to Payments to Government Officials/Employees

We must not directly or indirectly pay, give, offer, or promise any form of bribe, gratuity, or kickback to any government official or employee.

We must comply with the United States Foreign Corrupt Practices Act, and with similar laws elsewhere, that apply to payments to government officials/employees of other countries.

Under the Foreign Corrupt Practices Act, we may not directly or indirectly pay, give, offer, or promise money or anything of value to any officer, employee or representative of a government outside the United States or of a public international organization, or to any political party, party official, or candidate for political office outside the United States in order to (1) secure an improper advantage in obtaining, retaining, or directing business, (2) influence any act or decision of the recipient in an official capacity, or (3) induce the recipient to do or omit to do an act in violation of such person's lawful duty.

An example of an impermissible indirect activity would be a payment made through an intermediary or agent where we know or should be aware that such payment would be passed along for prohibited purposes.

Laws Relating to Equal Employment Opportunity and Workplace Harassment

Abbott's policy is to provide employment opportunities without regard to race, religion, color, national origin, sex, age, ancestry, citizenship, veteran status, marital status, sexual orientation, or disability or any other reason prohibited by law. Decisions as to hiring, promotion and other aspects of the employment relationship should be based solely upon job-related qualifications.

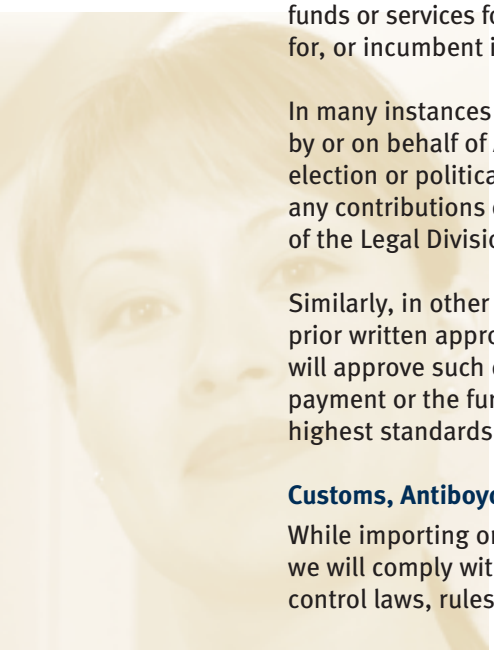
Abbott also prohibits sexual harassment, as well as harassment based on any of the other characteristics listed above, and will take appropriate action to eliminate prohibited harassment and remedy the effects of such harassment.

Laws Relating to Data Privacy

Abbott is committed to the protection of individuals' privacy. We must comply with applicable privacy laws, rules and regulations wherever Abbott does business, and in all aspects of its business. Those laws, rules and regulations are complex and differ from country to country. If anyone has a question or concern about collecting, using, disclosing or storing an individual's information, either within Abbott or in a relationship with a third party, contact the Legal Division for advice before proceeding.

Laws Relating to the Environment

Abbott is committed to protecting the environment by minimizing the negative environmental impact of our operations and promoting sustainable use of natural resources. We must comply with all applicable environmental laws, rules and regulations in all countries where we do business.



Laws Relating to Political Contributions

Except as permitted by applicable law, we will not provide or promise Abbott funds or services for political purposes to any political party or any candidate for, or incumbent in, any public office.

In many instances in the United States, gifts, contributions, or expenditures by or on behalf of Abbott in connection with any Federal, state, or local election or political process are prohibited or regulated. We will not make any contributions on behalf of Abbott without the prior written approval of the Legal Division.

Similarly, in other countries we will not make any contributions without the prior written approval of the Legal Division. The only time the Legal Division will approve such contributions is when they have determined that the payment or the furnishing of services is consistent with the laws and highest standards of business ethics and conduct of the country involved.

Customs, Antiboycott, Embargo, and Trade Control Laws

While importing or exporting products, services, information or technology, we will comply with all applicable customs, antiboycott, embargo, and trade control laws, rules and regulations.

The United States antiboycott law prohibits Abbott and its affiliates from participating in any international economic boycott in which the United States does not participate, such as the Arab boycott of Israel. It prohibits refusing to do business with the target of any such boycott, or any blacklisted firms; and it prohibits furnishing boycott-related information. Abbott must report boycott-related requests to the United States Government.

The United States embargo and trade control laws prohibit, restrict, or regulate transactions in goods, funds, services, or technology with certain persons, companies, and countries based on national security and policy interests.

Employees who have any responsibility for the importation or exportation of products, services, or funds or the transfer or disclosure of technology must be thoroughly familiar with and comply with these laws, rules and regulations.

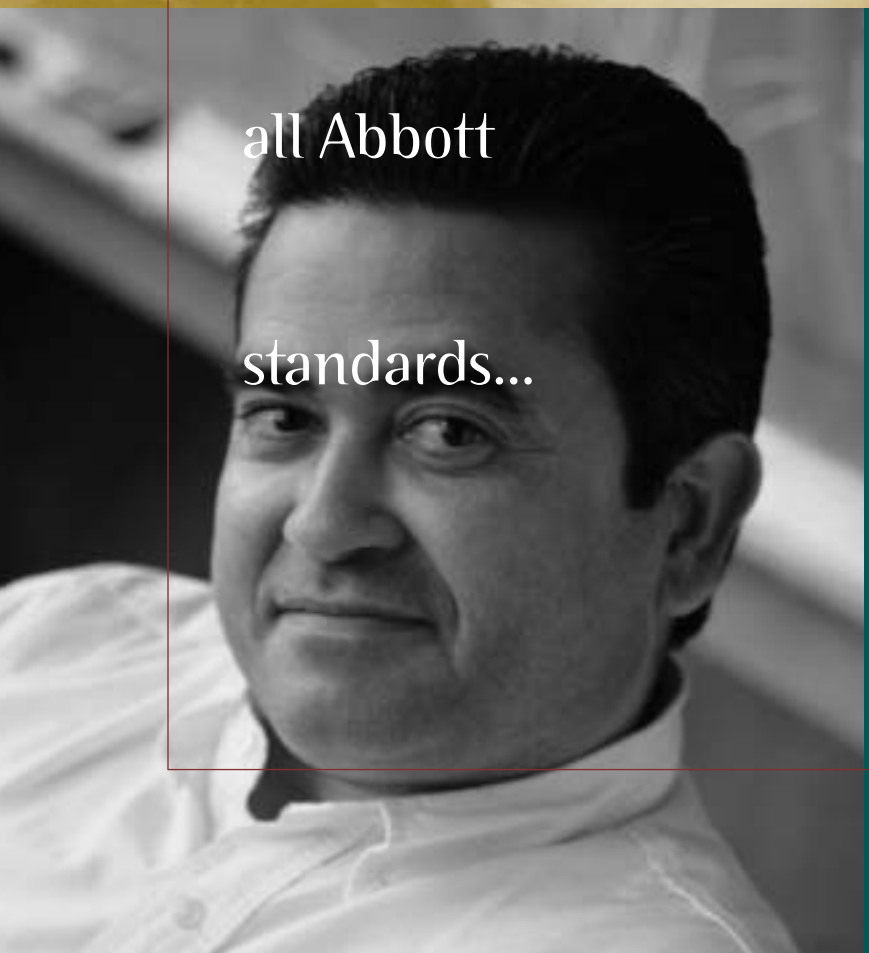
Anti-money Laundering Laws

We will comply with all applicable anti-money laundering laws, rules and regulations of the United States and other countries having comparable laws.

The anti-money laundering laws prohibit us from engaging in a financial transaction if we know that the funds involved in the transaction were derived from illegal activities. If you believe that the other party to a business transaction is engaged in any illegal activity or is using proceeds derived from an illegal activity, you must obtain approval from the Legal Division prior to entering into the transaction.

We will

comply with



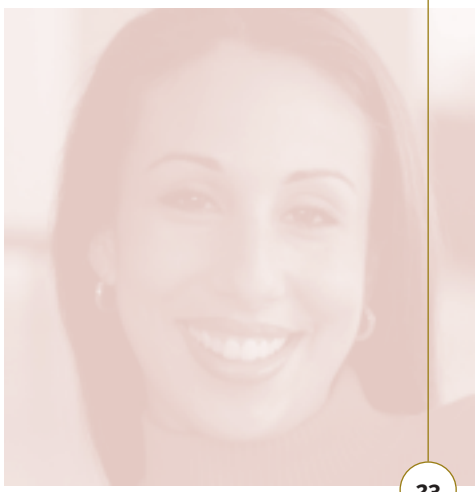
all Abbott

standards...

VI. Compliance with Abbott Standards, Policies and Procedures

PRINCIPLE 9: COMPLIANCE WITH ABBOTT STANDARDS, POLICIES AND PROCEDURES

We will comply with all Abbott standards, policies and procedures applicable to our work responsibilities.



We will comply, for example, with applicable Corporate Policies, and with applicable policies and procedures issued by Human Resources, Purchasing, Corporate Regulatory and Quality Science, Finance, IT, Office of Ethics and Compliance, etc.

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We will

protect Abbott

employees

and resources...

VII. Protection of Employees and Resources

PRINCIPLE 10: PROTECTION OF ABBOTT'S ASSETS

We must safeguard Abbott's assets against loss, damage, carelessness, waste, misuse and theft.

We will protect Abbott's assets, and promote their efficient and legitimate business use.

Abbott's assets, such as intellectual property, electronic media, work time, equipment, funds, products and services, are intended for legitimate business use.

We must use Abbott's assets efficiently and for legitimate business purposes, never for illegal or unethical purposes.

PRINCIPLE 11: PROTECTION OF ABBOTT'S CONFIDENTIAL INFORMATION

The disclosure of confidential information regarding Abbott's business, financial, legal, regulatory or scientific operations, whether intentional or accidental, can adversely affect the financial stability and competitive position of Abbott and the job security of its employees.

We will protect Abbott's confidential information.

Because of this risk of harm to Abbott and its employees, we must not, during the term of our employment by or affiliation with Abbott or thereafter, disclose to third parties any confidential information obtained during the course of employment or affiliation except pursuant to a confidential disclosure agreement or confidentiality provision drafted or approved by the Legal Division, unless such disclosure is legally mandated as determined by the Legal Division.

"Confidential Information" means all non-public information in Abbott's possession, whether through internal or external development, that might be of use to competitors, or harmful to the financial stability or competitive position of Abbott if disclosed, including but not limited to:

- Discoveries, inventions, improvements and innovations, whether or not patentable or copyrightable
- Methods, processes and techniques, including manufacturing process information
- Shop practices
- Formulae, compounds and compositions
- Organisms
- Biological materials
- Computer software
- Equipment
- Research, clinical and pharmacological data
- Regulatory filings and approval dates
- Marketing and sales information
- Personnel data
- Customer lists
- Financial, pricing and accounting data
- Supplier data (names of suppliers, pricing, sources of supply, anticipated requirements)
- Results of regulatory inspections/ audits
- Business plans, and updates to business plans
- Potential acquisitions, licenses or other business deals
- Potential divestitures
- Potential equity interests
- All other know-how and trade secrets

PRINCIPLE 12: EMPLOYEE HEALTH AND SAFETY

Abbott is committed to protecting the health and safety of its employees. We will act promptly to address any unhealthy or unsafe condition. This includes taking steps to protect the physical safety and security of Abbott employees.

We will protect the health and safety of Abbott employees.

To meet this goal, each employee has responsibilities. We need to follow health and safety requirements. But beyond that, each of us must observe established safe work practices to ensure our own safety and that of our co-workers. This includes reporting to work free from the influence of drugs or alcohol that could impair one's ability to work safely and conscientiously.

If you are involved in, or know of, an accident or dangerous situation, it is your duty to report it to management promptly and, when appropriate, take corrective action.

We will use Abbott's electronic media for legitimate business purposes.

Abbott provides access to and use of electronic mail, voicemail, the intranet, the Internet, and other electronic media for business purposes. We do this to make it easier for Abbott employees to communicate with each other and with appropriate outside parties – including contractors, suppliers, customers, government agencies and academic institutions.

We must not use Abbott's electronic media for any purposes that violate applicable laws, rules and regulations or Abbott standards, policies or procedures. This includes transmission of threatening, obscene or harassing materials.

Incidental personal use of electronic media that does not interfere with Abbott's business or an employee's performance of his or her responsibilities is acceptable, as long as such use does not include illegal, unethical or otherwise offensive subject matter.

Except as otherwise provided by applicable law, no officer or employee has any right to privacy regarding use of or access to any electronic media provided by or through Abbott. Abbott may monitor or access officer or employee use of its electronic media at any time in accordance with applicable law.

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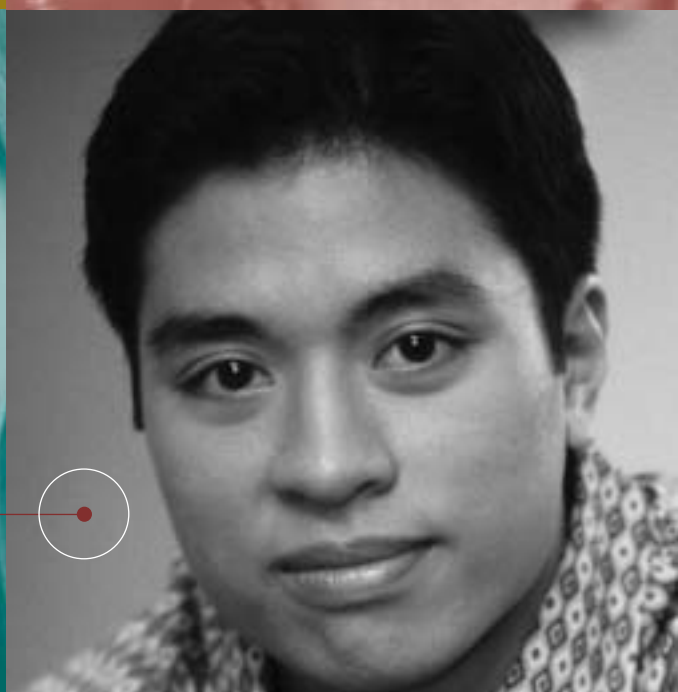
Each of

us is

responsible...



VIII. Accountability for Adherence to the Code

Each of us is responsible for our decision-making and for adherence to the Principles set forth in this Code.

Internal Investigations

Abbott will promptly investigate all alleged violations and potential violations of this Code, or of any related Abbott standard, policy or procedure. Any allegations will be treated confidentially, to the extent consistent with Abbott's interests and its legal obligations.

The Office of Ethics and Compliance will direct all such internal investigations. No person covered by this Code may conduct his or her own investigation.

We are all expected to cooperate in the investigation of an alleged violation of the Code.

If Abbott determines that corrective action is necessary to fix a problem and avoid the likelihood of its recurrence, Abbott will promptly decide what steps to take, including legal proceedings when appropriate.

Disciplinary Action

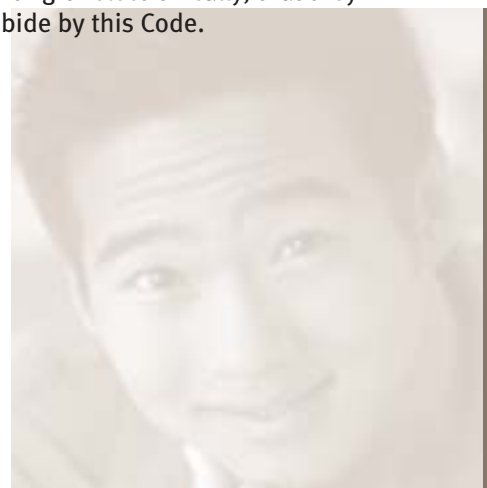
To the extent legally permissible under applicable law, appropriate disciplinary action will be taken, in relation to this Code or any related Abbott standard, policy or procedure, for:

- Authorization of or participation in violations
- Failure to report a violation or potential 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
- Retaliation against an individual for good faith reporting of a violation or potential violation

Disciplinary action may, when appropriate, include dismissal.

Certification

All officers and employees must certify, in writing or electronically, that they have received, read, understood, and shall abide by this Code.



IX. Waivers and Amendments

Any waiver of this Code for a Corporate Officer may be made only by the audit committee of the Abbott board of directors. Any waiver of this Code for a person covered by this Code who is not a Corporate Officer may be made only by the Chairman of the Board and Chief Executive Officer (or designee).

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

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Certification

As applicable to my work responsibilities—

1. I will deal honestly and ethically with Abbott and on Abbott's behalf in all matters.
2. I will avoid actual or apparent conflicts with Abbott's interests.
3. I will advance Abbott's business interests when the opportunity to do so arises.
4. I will comply with Abbott's standards, policies and procedures regarding gifts, meals and entertainment.
5. I will ensure the accuracy and integrity of Abbott's books, records and accounts.
6. I will protect the confidential information of customers and others which I receive in the course of conducting Abbott business.
7. I will ensure that, in all reports and documents filed with or submitted to the United States Securities and Exchange Commission by Abbott and in other public communications made by Abbott, Abbott's disclosures are full, fair, accurate, timely and understandable.
8. I will comply with all laws, rules and regulations applicable to my work responsibilities in every country in which Abbott does business.
9. I will comply with all Abbott standards, policies and procedures.
10. I will protect Abbott's assets, and promote their efficient and legitimate business use.
11. I will protect Abbott's confidential information.
12. I will protect the health and safety of Abbott employees.
13. I will use Abbott's electronic media for legitimate business purposes.

I certify that I have received, read, understood and will abide by the **Code of Business Conduct.**

SIGNATURE _____ DATE _____

NAME _____