

# Abbott

---

## *Comprehensive Ethics and Compliance Program*

### **Introduction**

The Investors section of Abbott Laboratories' website (<http://www.abbott.com>) conveys the essence of Abbott's ethics and compliance program (the "Program"). Abbott's Program reflects Abbott's commitment to compliance with the laws and regulations applicable to our business, including the California Health and Safety Code §§119400-119402 (the "California Act"). This document describes the fundamental elements of Abbott's Program. The reader is also encouraged to review the Abbott Code of Business Conduct ("Abbott Code") in the Investors - Governance section of Abbott's website.

Interested parties may also call 1-855-294-4584 to request a copy of this document or any of the above-referenced materials.

### **Program**

Abbott's Program is an integrated, company-wide program that is based on company values, laws and regulations. It is organized around the seven elements of an effective compliance program as set forth in the voluntary "Compliance Program Guidance for Pharmaceutical Manufacturers" published in April 2003 by the Office of Inspector General, U.S. Department of Health and Human Service ("HHS-OIG Guidance"). The program also requires compliance with voluntary industry guidelines, including the Advanced Medical Technology Association Code of Ethics on Interactions with Health Care Professionals ("AdvaMed Code"), which was most recently revised as of January 2020. Following is a brief description of each of the seven elements of Abbott's Program.

#### **1. Leadership**

The Chief Ethics and Compliance Officer (CECO) is responsible for the management and operation of the Office of Ethics and Compliance (OEC) and the development and enhancement of the compliance program. The CECO makes regular reports regarding compliance matters to the Chairman of the Board and the Chief Executive Officer, senior level leadership and Abbott's Board of Directors and committees. The Business Conduct Committee (BCC) consists of senior-level leadership and is chaired by the CECO. The BCC is accountable directly to the Chairman of the Board and the Chief Executive Officer and was established to assist in the implementation of the compliance program. The BCC holds periodic meetings to discuss matters including: 1. the legal and regulatory environment, risk areas and best practices; and 2. modifications to the compliance program on the basis of such evaluation. OEC staff provides dedicated support to each of Abbott's businesses.

## 2. Written Standards

### *Code of Business Conduct*

Our basic guidelines and requirements for ethical behavior are set forth in the Abbott Code of Business Conduct, published in print and online in 29 languages. Abbott employees read and certify adherence to our Code annually. Our Code states clearly that Abbott does not tolerate illegal or unethical behavior in any aspect of our business. It emphasizes the importance of ethical and honest conduct, adhering to Abbott's policies and procedures, treating confidential information appropriately, avoiding conflicts of interest and maintaining Abbott's books and records with accuracy and integrity. Further, it requires our employees to ask questions or report any concerns.

### *Policies and Procedures*

In addition to our Code, we adopt policies and procedures that guide employees as they conduct their day-to-day activities. They encompass relevant laws and regulations, including food and drug laws and laws relating to government health care programs. They also take into account industry best practices, including provisions of the updated Advanced Medical Technology Association (AdvaMed) Code of Ethics on Interactions with Health Care Professionals, as well as other applicable industry codes. We regularly update our policies to incorporate changes to the law and industry codes, including rules regarding gifts, meals and education we provide to health care professionals.

## 3. Effective Lines of Communication

Creating an environment where employees can raise questions and concerns helps us advance our commitment to ethical behavior. We have established systems and processes for employees to ask questions and report suspected or actual violations of our Code, policies and procedures. We offer a number of resources to employees, such as our Ethics and Compliance Helpline (which permits reports in several different languages), a telephone and web-based hotline available 24 hours a day, seven days a week. Employees also may contact the OEC or the CECO directly. The OEC also creates opportunities to engage in face-to-face interactions with employees by maintaining offices in the business, and participating in national and regional sales meetings and local site meetings. This creates an environment for discussion and allows employees to have a person to approach about issues that may be of concern.

All allegations reported to the OEC Investigations Group are investigated and documented. Specifically, once an allegation is received, an assigned investigator is tasked with examining the allegations and a report is sent to a Director, or more senior member of the OEC, for review to ensure consistency and completeness. Where necessary, the OEC then works with management and human resources to implement corrective action, which can range from counseling and coaching to termination.

## 4. Training

Training and education programs for employees increase their awareness of our Code's precepts and the legal and ethical implications of their actions and behaviors. Abbott ethics and compliance officers

work with our local commercial teams throughout the world to help them conduct trainings and education programs that help ensure compliance and strengthen Abbott's reputation as a responsible corporate citizen while enhancing relationships with customers and other stakeholders.

For example, employees in more than 80 countries, including the U.S., Puerto Rico, Latin America, Europe, and Asia, participate in our Legal and Ethics Resource Network program, a Web-based training system designed to increase awareness of the legal and ethical implications of business decisions. There are also many live, in person training sessions on specific topics.

## **5. Accountability**

Abbott employees are expected to adhere to our Code as a condition of their continued employment. Any Abbott employee who violates our Code, or any policy or procedure, is subject to appropriate disciplinary action. Any Abbott employee who fails to report a violation of Abbott policy or procedure of which he/she is, or should have been, aware may also be subject to disciplinary action. Abbott does not tolerate retaliation against anyone who makes a good-faith report regarding a violation or potential violation of our Code, policies or procedures. These guidelines are well publicized and enforced.

## **6. Assessment**

The OEC utilizes results from internal investigations, internal audits and internal monitoring programs to assess the effectiveness of, and identify areas for improvement in, the compliance program and relevant business practices. In addition, we consider the external environment, including government investigations, settlements, industry codes and government guidance to identify new opportunities to enhance the compliance program.

## **7. Remediation**

Results of investigations, audits and monitoring are communicated to the appropriate OEC staff and business leaders. When an area for improvement is identified, the OEC partners with the business to implement corrective actions.

## **Declaration for purposes of the California Act**

In accordance with the California Act, Abbott has established a specific annual dollar limit of \$3,000, which applies to promotional materials, items, and activities provided by an employee of relevant Abbott businesses to covered recipients in California. In addition, the following expenses are excluded from the limit: expenses that are directly associated with payments statutorily excluded from the limit (e.g., meals for consultants), items provided to health care professionals that are ultimately intended for patients or consumers, receptions at third party educational or professional meetings. To the best of its knowledge, Abbott declares that as of July 1, 2020, it is in all material respects in compliance with the requirements of the California Act.