



OUR GLOBAL POLICY ON THE MARKETING OF INFANT FORMULA

Policy mandatory effective September 2020

Applicable to all Abbott employees and available to external interested members

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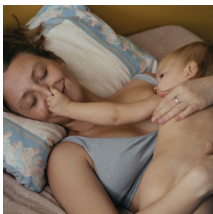
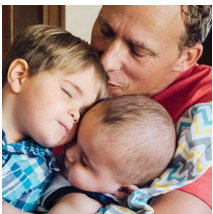
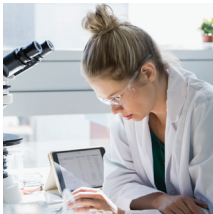
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INTRODUCTION

At Abbott, we believe proper nutrition is the foundation for living the best life possible and access to nutrition is critical.

We believe that breast milk provides the best nutrition for Infants, and we support the goal of the World Health Organization (WHO) to increase breastfeeding. We also believe there is no one better to make the decision about the most appropriate ways to feed a child than parents—and that's why we fully support a parent's right to choose.

We know parents will never give up on providing the best for their children. At Abbott, we'll never give up on working tirelessly to develop the best, most scientifically forward and innovative lifesaving nutrition for children everywhere.



OUR APPROACH TO NUTRITION INFORMATION

We believe nutrition is critical for building lifelong health—especially for babies, at a time when their minds, bodies and immunities are developing rapidly.

We agree with the World Health Organization’s recommendation of 6 months of exclusive breastfeeding and the introduction of safe and appropriate Complementary Foods thereafter. We encourage continued breastfeeding up to age 2 and beyond. We agree that breast milk provides the best nutrition for Infants, and we support the goal of the WHO to increase breastfeeding.

As recognized by the WHO, for Infants who cannot breastfeed or be fed breast milk as recommended, for medical reasons or otherwise, Infant Formula is the only appropriate, safe alternative to meet babies’ nutritional needs. This is why Abbott has been developing science-based nutrition products for more than 110 years—from products that help babies and children grow to those that support the unique nutritional and therapeutic needs of Infants and children who have specialized dietary requirements. We respect and support every parent’s right to choose the most appropriate methods to feed their children, whether that’s breast milk, formula or a combination.

Over the years, we have been guided by the principle that Infant Formula, Follow-up Formula and Complementary Foods should not be marketed in a way that competes with breastfeeding or interferes with the protection and promotion of breastfeeding.

We play an important role in ensuring parents have the most accurate information about their babies’ nutrition and understand options to help them make more informed and confident choices about what to feed their babies. Our products are developed based on guidelines and expertise from medical professionals and are backed by years of clinical studies and safe feeding.

We believe responsible marketing and communication have value in helping parents and caregivers engage in more informed conversations with their Healthcare Professionals (HCPs), ultimately leading to better health outcomes. We act in the best interest of our customers and respect the trust they place in us.



We have reinforced with all employees involved in marketing activities to show respect for consumers' choices and for people who choose not to use our products. We operate on the basis that, in the more than 150 countries in which we operate, one size does not fit all. We believe individual governments are best positioned to determine appropriate laws and regulations for their citizens and economies.

It is our responsibility and highest priority to ensure that our products are safe and effective. This includes providing clear information on the storage of our products and communicating clearly that inappropriate use may present a health hazard.

We recognize that HCPs and institutions play an important role in guiding Infant feeding practices and providing patient advice. This advice should be independent and free from undue commercial influence from manufacturers and other parties that have a commercial interest.

OUR COMMITMENTS

At Abbott, we are committed to communicating ethically and responsibly about all our products and to ensuring all statements—in all our materials and communications—are science-based, balanced and factual.

Internal review processes are in place to ensure that all our product claims are accurate, supported by sound scientific evidence and compliant with all pertinent laws and regulations.

We acknowledge the importance of the World Health Organization's 1981 International Code of Marketing of Breast-Milk Substitutes (WHO Code) and subsequent World Health Assembly (WHA) resolutions. We respect the aim and principles of the WHO Code to contribute to the provision of safe and adequate nutrition for Infants.

We are committed to compliance with national laws and regulations dealing with marketing practices for Infant Formula. In countries where Abbott's Policy is more stringent than national regulations, we follow our Policy. We comply with all relevant local laws and regulations in every country in which we operate. This includes globally recognized standards, such as those adopted by the Codex Alimentarius Commission.



We are committed to the advancement of science to help provide the best possible health outcomes for Infants and young children who consume our products. Abbott has conducted hundreds of clinical studies to demonstrate the safety and efficacy of our products.

In line with our commitment to nutrition, we closely monitor changing dynamics and review our policies and practices for continued effectiveness and relevance, with an emphasis on continuous improvement and integrating learning from our experiences.



SCOPE

This global Policy applies to the marketing of Infant Formula, when intended for use for Infant feeding from birth to 6 months of age, and to any other product suitable for use as a partial or total replacement of breast milk for use for Infant feeding from birth to 6 months of age. For countries defined as Higher Risk Countries, applicable products are extended to include Follow-up Formula, when intended for use for Infant feeding from 6 to 12 months of age.

This global Policy excludes products designed for Infants with special medical needs, such as inborn errors of metabolism, severe gastrointestinal impairment, treatment of malnutrition and prematurity.

This global Policy applies to all countries where Abbott operates. It is supplemented by country-specific procedures and guidance to reflect applicable legislation. In all countries, Abbott complies with applicable laws and regulations, in addition to our Policy. In countries where Abbott's Policy is more stringent than national regulations, we follow our Policy.

This global Policy applies to all employees and partners involved in the marketing, distribution and selling of products on behalf of Abbott Nutrition.

Abbott is not engaged in any joint ventures that produce applicable products under an independent brand. All Abbott brands in scope must follow this Policy, whether produced directly by Abbott or under contract by a third party.

DEFINITIONS

Note: Definitions in this section are intended for the purpose of this Policy. Local definitions may be different. Where this is the case, the local definition applies.

TERM	DEFINITION
Infant	A person not more than 12 months of age
Infant Formula	A breast milk substitute specially manufactured to satisfy, by itself, the nutritional requirements of healthy Infants during the first 6 months of life, up to the introduction of appropriate complementary feeding
Follow-up Formula	A liquid or powder product intended for a particular nutritional use by Infants over 6 months of age, when appropriate complementary feeding is introduced, and constituting the principal liquid element in a diversified diet for Infants
Complementary Food	Any food suitable as a complement to breast milk or to Infant Formula or Follow-up Formula when it becomes insufficient to satisfy the nutritional requirements of the Infant
Educational Material	Any material, written, oral or visual, that provides information about topics related to nutrition, healthcare or growth and development of an Infant or child that is not intended to promote a specific brand of a product
Events	Symposia, congresses and other scientific or professional meetings
Healthcare Professional	Any individual who maintains health in humans through the application of the principles and procedures of evidence-based medicine and caring
Healthcare System	The organization of people, institutions and resources that delivers healthcare services to meet the health needs of target populations
Higher Risk Country	Country where health and nutrition are at greater risk, defined by a rate of mortality of more than 10 per 1,000 people under 5 years of age

OUR EXPECTATIONS

ADVERTISING AND PROMOTION

As a global leader in nutrition, Abbott has a role in ensuring parents have the most accurate information about their babies' nutrition. Where advertising and promotion is allowed, all advertising and promotion of Infant and Follow-up Formulas must be science-based, balanced, factual, accurate and not misleading. Advertisement and promotion cannot state or imply any superiority of formula feeding to breastfeeding.

Nutrition and health benefit claims must have a sound scientific basis and undergo an internal review for accuracy and compliance. That internal review process must be followed in accordance with established promotional procedures. All promotional materials for Infant Formula should not be presented in a way that discourages parents or caregivers from breastfeeding or feeding breast milk to their Infants.

All employees responsible for marketing must be fully trained on this Policy. Any allegations of noncompliance will be investigated, and appropriate corrective action, including disciplinary measures, may be taken.

HEALTHCARE SYSTEMS

At Abbott, we understand that Healthcare Systems and Healthcare Professionals are in the best position to advise parents regarding feeding choices. Healthcare Systems should not be viewed as a promotional venue and should not be compensated to promote or advertise Infant and Follow-up Formulas.

Abbott employees may provide educational and instructional materials to Healthcare Systems but should not act as the primary point of contact to advise parents. Our employees should not enter into any relationship with a Healthcare System where the employee is compensated by a Healthcare System for the promotion of Infant and Follow-up Formulas.

When providing Infant and Follow-up Formulas, practice-related equipment or material to Healthcare Systems, Abbott Policy and national laws and regulations related to providing charitable contributions must be followed. Such product provisions must be reasonable, modest and appropriate. Product should not be used or distributed with the intent to discourage a parent or caregiver from feeding breast milk to an Infant.



HEALTHCARE PROFESSIONALS

At Abbott, we are committed to advancing the science of nutrition and working with Healthcare Professionals in ways that promote the innovation and advancement of safe, nutritious and scientifically advanced products.

In order to facilitate continued professional development, Abbott may provide information to HCPs that is scientific, balanced and factual in nature. This information should not imply or create a belief that bottle-feeding is superior to breastfeeding.

No-charge product may be provided to HCPs for purposes of professional evaluation and for clinical and/or market research in accordance with applicable Abbott policies and national laws and regulations. Quantities should be limited to a reasonable amount.

All interactions with HCPs must be appropriate and conducted in accordance with this Policy and all Abbott policies that guide the provision of meals, brand reminders, cultural courtesies, and educational and third-party meeting support. No item, gift or benefit shall be offered or given as an inducement for the purchase, sale or recommendation of Abbott products.

Through countless clinical trials and studies, we conduct rigorous research to understand nutrition's role in growth and development. Our products are based on scientific research and innovation, as well as expertise from Healthcare Professionals. Our interactions with HCPs should never influence our research, processes or outcomes.

All educational grants (including any fellowships or sponsorships) to support HCP, patient or public education in relation to Infant and Follow-up Formulas must be provided in accordance with Abbott policies and procedures. Educational grants cannot be tied to past, present or future purchases of Infant and Follow-up Formulas or any other Abbott products.

The purpose and focus of all Events for Healthcare Professionals should be to provide balanced and accurate scientific information.



All Events must follow Abbott policies and procedures, including the following requirements:

1. Venue and Meals

All Events must be held in a venue conducive to scientific objectives and the purpose of the Event. Any meals must be reasonable in cost and be incidental to the main purpose of the Event.

2. Entertainment

No standalone entertainment may be provided by Abbott at these Events. Social activities that are secondary to an Event may be supported.

3. Payment for Professional Services for Presenters at Events

Abbott may enter into bona fide Professional Service Arrangements with Healthcare Professionals. Payment for such services must be reasonable and consistent with fair market value.

LABELING

Abbott fully supports a consumer's right to know what is in our products. We are transparent about the ingredients, nutrient composition and health properties of our products.

Labels for Infant and Follow-up Formulas must adhere to all local laws and regulations; provide necessary information about appropriate use of the product; not discourage breastfeeding; be easily read; and where required by local law or regulation, include the following points consistent with the WHO Code and local regulations:

- The phrase "Important Notice" or equivalent
- A statement on the superiority of breastfeeding
- A statement on the proper method of use of Infant Formula and, where applicable, that the product should be used only on the advice of a Healthcare Professional
- Instructions for appropriate preparation, use and storage of Infant and Follow-up Formulas and information about the risks of inappropriate preparation
- Statement of the ingredients used, the composition/analysis of the Infant and Follow-up Formulas, batch number and date before which the product should be consumed

Labels for Infant and Follow-up Formulas should not include pictures or text intended to discourage breastfeeding.

All labels must be approved in accordance with Abbott's labeling policies and procedures and must contain required elements and refrain from using prohibited statements or images. Labels should be designed to provide all necessary information on safe and appropriate use of the product.

QUALITY

At Abbott, we are dedicated to improving healthcare by providing high-quality, safe and effective products. This is achieved through a commitment to quality and the continuing effectiveness of our quality management system to meet customer expectations and regulatory requirements. We maintain compliance with all laws, rules and regulations in every country in which we operate.



CHARITABLE CONTRIBUTIONS

Abbott may provide charitable contributions of Infant and Follow-up Formulas in compliance with Abbott policies and procedures and national laws and regulations.

All charitable contributions of Infant and Follow-up Formulas to organizations must have prior written approval by Abbott Global Citizenship. Full records of requests must be maintained.

Organizational requests for Infant and Follow-up Formulas must be made to Abbott in writing and must contain the following information:

- Name of the organization that will receive the products
- Description of the circumstances that require Infant and Follow-up Formulas
- Number of Infants, quantity needed per Infant and feeding conditions (e.g., clean water source available for powder formula requests)
- The organization's process to ensure that Infant and Follow-up Formulas are distributed to Infants who require them and that supplies can be continued for as long as the Infants concerned need them

The requesting organization must acknowledge:

- It is aware of and abides by applicable national laws and regulations regarding Infant feeding.
- The use of Infant and Follow-up Formulas will be demonstrated only by health workers or other community workers, if necessary, and only to the parents or caregivers who need to use it.
- It will not seek reimbursement for the products provided.
- The products are not for resale.

IMPLEMENTATION AND MANAGEMENT



We acknowledge that, independent of any other measures taken by governments, Abbott is responsible for monitoring our marketing practices and for taking steps to ensure that our conduct at every level conforms to this Policy and applicable laws and regulations in the countries where we operate.

EMPLOYEES AND DISTRIBUTORS

All Abbott employees and partners involved in the marketing of Infant and Follow-up Formulas covered by this Policy must always abide by the highest ethical standards and must understand the aims and principles of this Policy.

Employees and relevant partners must be appropriately trained to follow relevant Abbott policies and procedures and national laws and regulations governing their interactions with Healthcare Professionals and consumers with regard to Infant and Follow-up Formulas, including appropriate contact with pregnant women, parents and caregivers, where permitted.

LEADERSHIP RESPONSIBILITIES

The ultimate responsibility for ensuring compliance with this Policy lies with the senior leadership of Abbott's Nutrition business, which includes global, regional and country leaders. This responsibility includes ensuring all employees who engage in marketing and promotional activities for Infant and Follow-up Formulas follow all Abbott policies and procedures and national laws and regulations governing their geographies.

TRAINING AND COMMUNICATION

Ethics and compliance training is a critical part of Abbott's compliance program and culture. Abbott provides training to relevant employees on responsible marketing and promotional practices and requires that all employees who are engaged in marketing and promotion of Infant and Follow-up Formulas are trained prior to engaging in such activities. All employees must receive training on relevant policies and must follow applicable procedures.

Abbott employees are required to read and certify adherence to our Code of Business Conduct annually, which includes acknowledgment of adherence to applicable policies and procedures. In addition to training, local and corporate Office of Ethics and Compliance (OEC) staff are available to answer questions and provide direction to help support compliance with regard to Infant and Follow-up Formula marketing practices.

At Abbott, we regularly review our policies and procedures and update them to account for changes in regulation. Policies and procedures regarding marketing of Infant and Follow-up Formulas are accessible to our employees through the Abbott OEC website.

All Abbott employees routinely receive training and communications on resources available to them to enable them to ask questions and report concerns.