



Abbott Third-Party Guidelines

Abbott is committed to operating its businesses in a legal and ethical manner, and Abbott expects its Third Parties (for example, distributors, dealers, wholesalers, resellers, and marketing partners promoting and selling Abbott products) to hold themselves to the high standards of legal and ethical compliance to which Abbott holds itself.

Abbott expects Third Parties to (i) comply with the following guidelines when working on behalf of Abbott in distributing, marketing, promoting or selling Abbott products, (ii) maintain internal controls (including policies and training) designed to ensure compliance, and (iii) ensure that any sub-contractors or agents that are appointed by Third Parties receive and understand the following guidelines:

1. **Comply with Laws and Industry Codes.** Abbott expects its Third Parties will comply with all applicable legal requirements and industry codes. This includes, but is not limited to, anti-bribery and anti-corruption laws, competition and unfair business practices laws, restrictions on advertising activities, and any laws, regulations and codes that govern interactions with Health Care Professionals (HCPs), Health Care Institutions (HCIs) and Government Officials (GOs).
 - a. HCPs are any medically licensed or scientifically trained professionals using or expected to use such license or training in his or her work providing health care, any person making purchasing or usage decisions about Abbott products for an HCI.
 - b. HCIs are any entities, facilities, institutions, foundations, associations, or organizations that employ HCPs or sites where HCPs provide health care to patients.
 - c. GOs are any persons who are employed by an entity that is owned, controlled, funded, or operated by any level of government in any country as well as any persons acting as government agents or representatives.
2. **Interactions with HCPs, HCIs, and GOs.** Abbott is committed to doing business the right way, and we expect the same from our Third Parties. When marketing or selling Abbott products, Abbott expects its Third Parties will not take any actions that could interfere with the independent, professional judgment of the HCPs, HCIs or GOs that purchase, prescribe or use Abbott products. This includes the following:
 - a. **The Right Basis for Interactions.** Nothing of value will be provided or offered, including those items set forth in 2.b. - 2.h. below, to HCPs, HCIs or GOs, in order to: (1) get or reward a sale; (2) reward any past or existing relationship; (3) reward any action taken by the recipient; (4) influence any future decision or action taken by the recipient; (5) obtain or retain business; or (6) direct business to any person or away from any person. This is not limited to payments of money, and includes offering or providing things such as gifts, travel, meals, lodging, grants, speaker fees, donations, and sponsorships.

- b. **Medical Sponsorships.** If allowed by applicable laws and industry codes, Third Parties may provide support for HCPs to attend third party educational, scientific, and public policy conferences and similar meetings. Recipients of such support must have appropriate qualifications, as well as legitimate training or educational needs. Financial support should be limited to conference registration fees and reasonable travel, meals, and accommodation associated with attendance at the conference. Standalone sightseeing, entertainment, leisure, or social activities may not be paid for or provided.
- c. **Third Party Meeting Support.** If allowed by applicable laws and industry codes, Third Parties may provide funding to support independent, third party, educational, scientific, and public policy conferences and similar meetings. This type of support can only be provided to organizations with a genuine educational function, and not to an individual person. Financial support will be limited to reasonable costs associated with third party conferences, including the overall costs of the program, booth costs, faculty costs and expenses, and modest meals and receptions.
- d. **No Gifts; Brand Reminders, Items of Medical Utility and Cultural Courtesies.** If allowed by applicable laws and industry codes, reasonable promotional brand reminders, items of medical utility, and cultural courtesies may be provided. Items of medical utility are limited to educational items of a modest value that are intended to aid in the medical care of patients. Cultural courtesies are limited to greeting cards or perishable items of nominal value to recognize a national or religious holiday or a personal milestone. Cash or cash equivalents cannot be given.
- e. **Meals and Travel.** If allowed by applicable laws and industry codes, HCPs may be provided with modest meals and may be reimbursed for reasonable travel expenses (accommodation, meals, transportation, visa, insurance, and registration) in connection with a training event or legitimate business occasion. Meals and travel expenses cannot be provided to guests, spouses, or family members of HCPs. Travel to venues known primarily for gambling, entertainment, spa, or sporting activities is not allowed. Personal expenses incurred by an HCP or other recipient of travel support, such as fitness center charges, spa fees, or side trips may not be paid for or reimbursed.
- f. **Professional Services Arrangements.** If allowed by applicable laws and industry codes, HCPs can be paid for providing bona fide professional services such as speaking at conferences and physician training sessions. However, the HCP must be appropriately qualified, there must be a legitimate business need for the services, fees must be based on fair market value, and services must be provided in accordance with a written agreement.
- g. **Charitable Contributions.** If allowed by applicable laws and industry codes, contributions to organizations or entities for charitable purposes (such as improving delivery of healthcare, increasing access to healthcare technology) and humanitarian assistance may be provided.
- h. **Facilitation Payments.** Facilitation payments are not allowed. A facilitation payment is a payment to a GO that is intended to expedite a routine government

action that the official or employee is already bound to perform (for example, obtaining permits, licenses, or other official documents to qualify a person to do business in a country, processing visa applications, scheduling inspections associated with contract performance or a regulatory application, or providing phone service, power or water supply).

- i. **Supporting Expense Documentation.** Any expenses tied to permitted activities described above must be supported with fully itemized receipts or invoices, which are timely and accurately described in business expense reports and other related documents.
3. **Keep Accurate Books and Records.** All transactions and expenses incurred by Third Parties in connection with Abbott business or Abbott products must be accurately recorded in a timely manner and in reasonable detail. All records of transactions and expenses will be maintained in Third Parties' books, records and accounts, including documents sufficient to reflect the actual nature, amount, recipient(s), approvals, and purpose of those transactions. Third Parties are expected to comply and cooperate with Abbott audits, and cannot misrepresent or conceal the nature or amount of any transaction.
4. **Samples and Free Products.** If allowed by applicable laws and industry codes, reasonable quantities of samples of Abbott products may be provided to HCPs or customers. The quantity of samples provided must be reasonable based on the product, the recipient, and the nature of the intended usage. Recipients must be informed that samples are being provided at no cost, and may not be sold or billed to any patient, private insurer or government insurance program.
5. **Discounts, Rebates, and Other Commercial Terms.** All discounts, rebates, and other commercial terms must be appropriately documented and disclosed to customers. Discounts (including free of charge product provided with a purchase) must be based on measurable criteria that are disclosed in advance.
6. **Conflicts of Interest.** Business decisions must not be improperly influenced by personal interests or relationships, including personal or non-Abbott business relationships with Abbott employees. Any concerns a Third Party has regarding a potential conflict of interest please should be reported to Abbott as detailed in Section 12, below.
7. **Marketing and Promotional Practices.** Marketing and promotional materials and activities must be accurate, in accordance with the approved product labeling or marketing authorization and comply with applicable laws and industry association codes. Abbott products must be marketed and promoted only for the purposes for which they are intended and approved.
8. **Competition.** Abbott business must be conducted in a manner that is in compliance with applicable anti-trust and unfair competition laws. Collusion with competitors on price, or on allocation of customers, products, regions, cities, or markets is prohibited.
9. **Exports and Trade Compliance.** Applicable import and export controls, sanctions, and other trade requirements must be followed.

10. **Data Privacy.** Any collection and handling of individuals' personal information shall be in conformance with applicable privacy and data protection laws or requirements and Abbott privacy policies or notices.
11. **Confidentiality.** Abbott's confidential information, including personal information collected for or from Abbott, should be protected and measures taken to prevent its loss, misuse, theft, fraud, improper access, disclosure or alteration.
12. **Who to Contact for Help.** If you have questions about whether a certain activity is permitted under these Third-Party Guidelines, you should raise to the Abbott employee with whom you work.

In addition, employees in Abbott's Office of Ethics and Compliance (OEC) are available to answer questions and address concerns, and can be contacted in many ways.

Telephone: +1-224-667-5210

Email: oecc@abbott.com

Fax: +1-224-668-3969

Address: 100 Abbott Park Road, Abbott Park, IL 60064, USA

You also may visit our multilingual Ethics and Compliance Helpline (<https://speakup.abbott.com>) available globally 24/7 to ask questions or voice concerns about a potential violation of Abbott's Code of Conduct or Third-Party Guidelines.

Nothing in these guidelines is intended to prohibit Third Parties from reporting any concern or illegal activity to the appropriate regulatory authority.