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| [Screen 0](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=1_C_1) [1\_C\_1](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=1_C_1)  | Code of Business ConductPlease click the forward arrow to begin. |  |
| [Screen 1](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=2_C_2) [2\_C\_2](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=2_C_2)  | As a global healthcare leader, we recognize that our success depends on the decisions we make and the actions we take every day.Our Code of Business Conduct is critically important because it provides a foundation for our responsibilities and behaviors, and helps us make the best choices for Abbott, for ourselves, and for the many people we serve.This course is intended to provide a high-level overview of our Code of Business Conduct. It outlines the company’s expectations and your obligations. It also provides some practical advice on what to do when the best path forward is hard to determine. |  |
| [Screen 2](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=3_C_3) [3\_C\_3](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=3_C_3)  | Upon completion of this course, you will be able to:* Recognize why the Code of Business Conduct is critically important to our business
* Locate and use the Code of Business Conduct
* Identify the key principles of the Code of Business Conduct and understand how they apply to our everyday work practices
* Use the decision-making AID to navigate through complex situations
* Know where to go to ask questions and raise concerns

The course will take 35-45 minutes to complete. |  |
| [Screen 3](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=4_C_6) [4\_C\_6](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=4_C_6)  | Knowledge CheckOnce you have reviewed the content of this course, you will be required to complete a 10-question Knowledge Check. |  |
| [Screen 4](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=5_C_7) [5\_C\_7](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=5_C_7)  | Every year you will be asked to certify to the Code by completing a separate Code of Business Conduct Certification. All employees need to complete this certification. |  |
| [Screen 5](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=6_C_8) [6\_C\_8](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=6_C_8)  | The Code of Business Conduct describes our commitment to hold ourselves to the highest ethical standards and operate with honesty, fairness, and integrity as we represent Abbott in our daily work.In this section, you will learn why the Code is critically important to our business and how to use our Code for guidance. |  |
| [Screen 6](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=7_C_9) [7\_C\_9](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=7_C_9)  | Our Code of Business Conduct is a critically important document that serves many functions. |  |
| [Screen 7](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=8_C_10) [8\_C\_10](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=8_C_10)  | Over 130 years ago, Abbott helped establish the high standards for safety and efficacy that are now the foundation of the modern healthcare industry.Our Code reflects this proud heritage and helps provide us with clear guidance for our future. |  |
| [Screen 8](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=9_C_11) [9\_C\_11](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=9_C_11)  | Our Code is what binds us together.It’s a reminder that even though we may be citizens of many nations and have diverse cultures and beliefs, we share a common purpose: to improve people’s lives and create healthier societies through our work. |  |
| [Screen 9](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=10_C_12) [10\_C\_12](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=10_C_12)  | Our Code is a resource.It describes for us the responsibilities and expectations that Abbott expects of us as we represent the company in our daily work.And while it is impossible for our Code to provide specific advice on every situation that we are likely to encounter, it provides us with a clear set of principles and values to base our decisions on when the best course of action is not immediately clear. |  |
| [Screen 10](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=11_C_13) [11\_C\_13](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=11_C_13)  | Although our Code has many functions and operates on many different levels, its fundamental message is straightforward:it is up to each of us, as employees and representatives of Abbott, to build our company and our brand by holding ourselves to the highest ethical standards and by operating with honesty, fairness, and integrity in our day-to-day work activities. |  |
| [Screen 11](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=12_C_14) [12\_C\_14](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=12_C_14)  | One of our principal goals is to make sure the Code is relevant and accessible to everyone in the business. |  |
| [Screen 12](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=13_C_15) [13\_C\_15](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=13_C_15)  | A simple, color-coded organizational structure makes it easy to find the things you need to know. |  |
| [Screen 13](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=14_C_16) [14\_C\_16](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=14_C_16)  | Concise descriptions of Abbott’s expectations of you, along with clear explanations of why we have established particular standards, are intended to help you incorporate the Code into your daily work. |  |
| [Screen 14](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=15_C_17) [15\_C\_17](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=15_C_17)  | The Code of Business Conduct is available in electronic format.This format offers some exciting features, which we hope will enhance your experience. |  |
| [Screen 15](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=16_C_18) [16\_C\_18](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=16_C_18)  | There are several ways for you to navigate through the content:* Back and Forward arrows allow you to move from screen to screen sequentially.
* The table of contents lets you navigate from section to section.
* A horizontal slider bar allows you to quickly flip through pages of content.
* The search function allows you to find what you are looking for using keywords or phrases.
 |  |
| [Screen 16](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=17_C_19) [17\_C\_19](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=17_C_19)  | We have provided easy one-click access to key resources. |  |
| [Screen 17](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=18_C_20) [18\_C\_20](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=18_C_20)  | The Speak Up area provides you with important contact information.Here, you can quickly find out who to contact if you have a question or want to report a concern. |  |
| [Screen 18](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=19_C_21) [19\_C\_21](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=19_C_21)  | Our interactive decision-making AID will help you ask the right questions to define a course of action that reflects Abbott’s values. |  |
| [Screen 19](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=20_C_22) [20\_C\_22](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=20_C_22)  | You can access the Code via Abbott World or Abbott.com.If you don’t have internet access or feel more comfortable reading the Code in hard copy, the Code is also available in PDF format. |  |
| [Screen 20](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=21_C_23) [21\_C\_23](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=21_C_23)  | The Code of Business Conduct describes our commitment to hold ourselves to the highest ethical standards and operate with honesty, fairness, and integrity as we represent Abbott in our daily work.PURPOSE OF THE CODEThe Code is a critically important document that serves many functions:* It reinforces and builds on the high standards and proud heritage for which Abbott is known;
* It is a reminder that even though we represent many nations and diverse cultures, we share a common purpose to improve people’s lives; and
* It is an important resource that describes the responsibilities and expectations that Abbott has of every employee.

FUNDAMENTAL MESSAGE OF THE CODEThe fundamental message of the Code is that it is 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 in our day-to-day work activities.FORMATSThe Code of Business Conduct is available in electronic and PDF formats.LAYOUTThe Code is designed to be accessible and intuitive. A simple, color-coded organizational structure makes it easy to find the things you need to know. Concise descriptions of Abbott’s expectations of you, along with clear explanations of why we have established particular standards, are intended to help you incorporate the Code into your daily work. |  |
| [Screen 21](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=22_C_24) [22\_C\_24](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=22_C_24)  | We are all responsible for understanding how our Code applies to our work and decision making.In this section, we will look at the Code principles and see how they apply to our everyday work practices. |  |
| [Screen 22](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=23_C_25) [23\_C\_25](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=23_C_25)  | The Our Customers section affirms our commitment to improve the health of the people who use our products.This section reminds us that the health and well-being of patients and consumers is our highest priority. It also affirms our commitment to provide healthcare professionals with timely and accurate information to assist them in making decisions and providing advice, while respecting their independent judgment to decide the best course of treatment for their patients. |  |
| [Screen 23](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=24_C_26) [24\_C\_26](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=24_C_26)  | CLICK EACH OF THE PANELS TO LEARN MORE.You must view all content before moving forward.Patients and ConsumersWe 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.Healthcare Professional JudgmentWe respect the expertise of healthcare professionals who provide guidance about healthcare treatment options and healthy living.Healthcare 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 healthcare 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. |  |
| [Screen 24](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=25_C_27) [25\_C\_27](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=25_C_27)  | The Our Products section affirms our commitment to deliver safe and effective products that people trust.This section reminds us that the delivery of safe and effective products includes multiple steps from the sourcing of materials through marketing, selling, and supplying our products, all while maintaining the highest standards of quality. It stresses our commitment to timely identifying, evaluating, and addressing product safety issues, as well as taking actions to prevent counterfeiting, illegal diversion, and theft of our products.This section also describes what we do to ensure our products are promoted and sold with honesty and integrity, and for the purposes for which they are intended and approved. |  |
| [Screen 25](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=26_C_28) [26\_C\_28](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=26_C_28)  | CLICK EACH OF THE PANELS TO LEARN MORE.You must view all content before moving forward.Product QualityWe 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.We are committed to timely identifying, evaluating, and addressing product safety issues. We provide healthcare 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 PromotionWe promote and sell our products with honesty and integrity.Our statements about our products, in all materials and communications, will be balanced, 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.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 rules of government healthcare programs. |  |
| [Screen 26](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=27_C_29) [27\_C\_29](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=27_C_29)  | The Advancing Science section affirms our commitment to improve healthcare outcomes through the innovation and advancement of healthcare solutions and product innovations.The Advancing Science section recognizes our commitment and desire to advance science. It reminds us that in pursuing innovation, we must recognize risk, and that it is our responsibility to take proactive steps to mitigate risk in advance where possible. It confirms our commitment to treat study participants with dignity and respect and states our commitment to transparency and objectivity in scientific research. |  |
| [Screen 27](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=28_C_30) [28\_C\_30](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=28_C_30)  | CLICK EACH OF THE PANELS TO LEARN MORE.You must view all content before moving forward.InnovationWe innovate and advance healthcare 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.Advancing ScienceWe 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 healthcare 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. |  |
| [Screen 28](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=29_C_31) Activity: Scenario[29\_C\_31](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=29_C_31)  | Imagine...Alex is setting up a post-marketing research trial for the purpose of comparing the efficacy and safety of Abbott’s chronic pain therapy technology with that of a competitor. Maria, a Marketing colleague in his region, calls to ask Alex to include Dr. Thomas in the trial. Dr. Thomas is a highly qualified interventional pain management physician, and Maria sees this trial as a great opportunity to introduce Abbott’s products to a new group of physicians who currently are not customers.That’s not correct...That’s correct... |  |
| [Screen 28](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=31_C_31) Activity: Questions[31\_C\_31](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=31_C_31)  | What should Alex do?[1] Ask his Marketing colleague to forward Dr. Thomas’ contact information.[2] Explain to his colleague that investigators for clinical trials are selected solely on the basis of their qualifications and expertise.Submit |  |
| [Screen 28](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=30_C_31) Activity: Feedback[30\_C\_31](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=30_C_31)  | We rely on healthcare professionals, such as doctors, nurses, and pharmacists, to use their independent judgment to decide the best course of care for their patients. Therefore, all decisions regarding research must be based solely on criteria such as academic and clinical qualifications and expertise. We never hire or provide a healthcare professional with a research opportunity in order to influence the healthcare professional’s purchase or decision to recommend a product, or as a means to reward, retain, or gain their business. |  |
| [Screen 29](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=32_C_32) [32\_C\_32](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=32_C_32)  | The Our People section reflects Abbott’s view that a culture of openness, diversity, and mutual respect generates creativity, innovation, and energy.The Our People section reminds us of our responsibility to understand and apply the Code in our day-to-day work activities ensuring that everyone feels welcome and supported and is treated with respect and dignity. This section describes our commitment to provide equal opportunities and a safe and secure work environment for all. It also reminds us of our obligation to ask questions when actions related to our work are unclear, and to speak up and report suspected violations of the Code. |  |
| [Screen 30](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=33_C_33) [33\_C\_33](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=33_C_33)  | CLICK EACH OF THE PANELS TO LEARN MORE.You must view all content before moving forward.CollaborationWe 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 OtherOur Connection to Each OtherWe 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.Reporting ConcernsWe 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.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.

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.Equal OpportunityWe 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.Fair TreatmentWe 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.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 EnvironmentWe 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. |  |
| [Screen 31](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=34_C_36) [34\_C\_36](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=34_C_36)  | The Our Communities section affirms our commitment to build trust in Abbott as a citizen of each local community and the world.This section recognizes Abbott’s commitment to give back to the communities in which we operate and serve. Abbott strives to make a positive and lasting difference in people’s lives. This section also recognizes Abbott’s commitment to minimizing its global environmental impact by reducing the use of energy and other natural resources, as well as encouraging appropriate engagement in the political process and support for community involvement. |  |
| [Screen 32](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=35_C_37) [35\_C\_37](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=35_C_37)  | CLICK EACH OF THE PANELS TO LEARN MORE.You must view all content before moving forward.Community InvolvementWe 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.Environmental ResponsibilityWe 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, recycling, and other activities to mitigate environmental risks. We adhere to the environmental laws and regulations applicable to our operations.Political ContributionsWe 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. |  |
| [Screen 33](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=36_C_38) [36\_C\_38](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=36_C_38)  | The How We Operate section affirms that we conduct business fairly and strive to follow through on our commitments in all respects of our work.The How We Operate section reminds us that we conduct business ethically and honestly and strive to follow through on our commitments in all respects of our work. It commits us to addressing and resolving conflicts of interest by placing the interests of the greater Abbott above our own. It commits us to protecting Abbott’s assets and reputation, safeguarding confidential information, and respecting the privacy of those who entrust us with their personal information. |  |
| [Screen 34](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=37_C_39) [37\_C\_39](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=37_C_39)  | CLICK EACH OF THE PANELS TO LEARN MORE.You must view all content before moving forward.Fair DealingWe 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, healthcare professionals, competitors, and others – we must be fair and straightforward about how Abbott conducts business. This principle of fair dealing is critical.Avoiding Conflicts of InterestWe 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.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.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, 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 & ReputationWe 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.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.Confidential InformationWe 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. These obligations may extend beyond employment with Abbott.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.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. |  |
| [Screen 35](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=38_C_40) Activity: Scenario[38\_C\_40](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=38_C_40)  | Imagine...Camille is a supply chain manager, who has hired a third party to supply logistical support for distribution in a newly opened market. It is year-end, and Camille’s manager instructs her to pay the third party even though he has not yet started the work that was committed that year and his contract specifies that payment is to be made upon completion of the work. When Camille questions her manager, she is told that the payment needs to be made before year-end because it has been budgeted in the current year.That’s not correct...That’s correct... |  |
| [Screen 35](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=40_C_40) Activity: Questions[40\_C\_40](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=40_C_40)  | What should Camille do?[1] She should make the payment. Services must be paid for in the year in which they are budgeted.[2] Camille should ask her manager to confirm his request in writing before making the payment.[3] She should not make the payment, unless the service is provided, and the work is completed.Submit |  |
| [Screen 35](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=39_C_40) Activity: Feedback[39\_C\_40](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=39_C_40)  | Camille should not make the payment, because the service has not yet been provided. Payments must be made according to the terms of the contract, regardless of when they are budgeted, to help ensure that our financial books are accurate. It is critical that our financial books, internal records, and documentation accurately reflect our actions. |  |
| [Screen 36](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=41_C_41) Activity: Scenario[41\_C\_41](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=41_C_41)  | Now imagine...Camille refuses to make the payment. Her manager calls her into his office and explains that, if the payment is not made, the department’s budget will be cut, which will negatively impact what the department can do next year. He tells her to make the payment and to indicate on the paperwork that the services have been performed and the work is completed.That’s not correct...That’s correct... |  |
| [Screen 36](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=43_C_41) Activity: Questions[43\_C\_41](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=43_C_41)  | What should Camille do in this situation?[1] She should stand firm and not make the payment, unless the service is provided. She should report the incident to the OEC.[2] She should report the incident to the OEC, but go ahead and make the payment.[3] Since not making the payment will negatively impact her department, she should make an exception and make the payment.Submit |  |
| [Screen 36](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=42_C_41) Activity: Feedback[42\_C\_41](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=42_C_41)  | Camille should not make the payment. She should immediately report the incident to the OEC. She has an obligation to prioritize the interests of the greater organization over the interests of her business division or working group. Her manager also has a responsibility to lead by example. He should not expect Camille to falsify documentation in violation of the Code. |  |
| [Screen 37](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=44_C_42) [44\_C\_42](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=44_C_42)  | The How We Operate section also affirms our commitment to get business the right way – never offering or accepting something of value as a reward for any past, existing, or future relationship with Abbott. It commits us to keep accurate and complete records, to ensure that our interactions with competitors are appropriate, and to always adhere to the laws, regulations, and Abbott requirements that apply to our work. |  |
| [Screen 38](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=45_C_43) [45\_C\_43](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=45_C_43)  | CLICK EACH OF THE PANELS TO LEARN MORE.You must view all content before moving forward.Anti-BriberyWe 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 healthcare 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 healthcare 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.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.Gifts, Meals & EntertainmentGifts, Meals and EntertainmentBecause 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.Accurate Books & RecordsWe 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 healthcare professionals. These laws help protect taxpayers, who ultimately pay for some or all of the purchases within the healthcare system. Abbott is committed to ensuring that we provide accurate information to allow governments, insurers and other stakeholders to make informed decisions.Compliance with LawsWe 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 healthcare 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.Fair CompetitionWe 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 anti-competitive 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. |  |
| [Screen 39](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=46_C_44) Activity: Scenario[46\_C\_44](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=46_C_44)  | Imagine...Boris, a Sales Manager from Russia, is attending a trade association meeting in Ireland. At a reception following the meeting, Boris runs into Mark, his former college roommate, now a Marketing Director at a major competitor. The two men haven’t seen each other in years and have a lot to catch up on. As the conversation moves into work-related areas, Mark asks Boris for advice on choosing the right pricing strategy for his company’s product sold in Russia.That’s not correct...That’s correct... |  |
| [Screen 39](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=48_C_44) Activity: Questions[48\_C\_44](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=48_C_44)  | What should Boris do?[1] Since Boris has known Mark for many years and is familiar with market conditions in Russia and the product Mark is selling, he should give Mark a few good tips to help him succeed. He could then use Mark’s knowledge of other markets for his own campaigns in the future.[2] Boris should clearly and adamantly respond that it is inappropriate for competitors to agree on prices or competitive terms, and that this discussion could be viewed as anticompetitive. Boris should immediately end the conversation and walk away, making sure that anyone else who overheard the discussion understands why he is walking away. He should then promptly report the incident to Legal or the Office of Ethics and Compliance.[3] Boris is free to discuss pricing strategies with Mark or any other competitor, as long as the discussion takes place during a trade association activity – because most trade association activities are considered procompetitive or competitively neutral.Submit |  |
| [Screen 39](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=47_C_44) Activity: Feedback[47\_C\_44](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=47_C_44)  | Since competition laws are very complicated and penalties for violations may include high fines and even imprisonment, it is important that Boris does not engage in any activity that could be viewed as anti-competitive, regardless of where it takes place. Boris should clearly and adamantly respond that it is inappropriate for competitors to agree on prices or competitive terms. He should immediately end the conversation and walk away, making sure that anyone else who overheard the discussion understands why he is walking away. He should then promptly report the incident to Legal or the Office of Ethics and Compliance. |  |
| [Screen 40](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=49_C_45) [49\_C\_45](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=49_C_45)  | The Code describes the company’s expectations of every employee as we represent Abbott in our daily work.OUR CUSTOMERSThe Our Customers section affirms our commitment to improve the health of the people who use our products. It reminds us that the health and well-being of patients and consumers is our highest priority. It also affirms our commitment to provide healthcare professionals with timely and accurate information, while respecting their independent judgment.OUR PRODUCTSThe Our Products section affirms our commitment to deliver safe and effective products that people trust. It reminds us of the need to ensure that our products are promoted and sold with honesty and integrity and for the purposes for which they are intended and approved.ADVANCING SCIENCEThe Advancing Science section affirms our commitment to improve healthcare outcomes through the innovation and advancement of healthcare solutions and product innovations.OUR PEOPLEThe Our People section affirms our commitment to foster a culture of openness, diversity, and mutual respect.OUR COMMUNITIESThe Our Communities section affirms our commitment to build trust in Abbott as a citizen of each local community and the world. It commits us to minimizing our global environmental impact, as well as encouraging appropriate engagement in the political process.HOW WE OPERATEThe How We Operate section affirms our commitment to conduct business fairly. It reminds us of the need to* Protect Abbott’s assets and reputation;
* Place the interests of Abbott above our own;
* Safeguard confidential information;
* Respect privacy;
* Actively oppose fraud and abuse;
* Measure achievements accurately;
* Adhere to all laws and regulations that apply to our work; and
* Ensure fair competition.
 |  |
| [Screen 41](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=50_C_46) [50\_C\_46](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=50_C_46)  | In this section, we will look at a number of other resources that are available to help provide support and guide you through the decision-making process. |  |
| [Screen 42](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=51_C_47) [51\_C\_47](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=51_C_47)  | In most cases, the principles embodied in our Code of Business Conduct, together with the policies and procedures applicable to your work, should provide sufficient guidance to help your decision making.However, at times, you may face situations where the right course of action is hard to determine.To help in these situations, we've developed a decision-making AID. |  |
| [Screen 43](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=52_C_48) [52\_C\_48](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=52_C_48)  | AIDAssessImpactDecideThe decision-making AID presents a systematic approach to decision making by encouraging us to ask a series of questions in order to ensure our actions support the principles embodied in the Code.Let’s take a few minutes to look at how the AID works in practice. |  |
| [Screen 44](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=53_C_49) [53\_C\_49](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=53_C_49)  | Imagine . . . Abbott is planning to launch a new product in an established region.Sara, an Operations manager who’s been with the company for over ten years, is handed the job of finding a new distributor.Sara receives three competitive bids. One of the bids is from a former Abbott employee, Luisa, who has recently left the company to start up her own distributorship.Sara knows Luisa well from her days at Abbott – she has an excellent reputation, years of experience, and is offering what she believes is the best service at a competitive price.In Sara’s mind, Luisa is the best candidate for the job. |  |
| [Screen 45](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=54_C_50) [54\_C\_50](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=54_C_50)  | And yet, since Sara has worked with Luisa extensively in the past, she is aware that awarding her the distributorship, even if she is the best candidate, could be viewed as a conflict of interest.So, Sara discusses the three bids with her manager, Daniel, who agrees with her assessment and tells her to award the contract to Luisa. |  |
| [Screen 46](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=55_C_51) [55\_C\_51](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=55_C_51)  | A few weeks after awarding the contract, a colleague remarks to Sara that he was a little surprised to hear Luisa was awarded the distributorship considering she’s Daniel’s sister-in-law.Sara is not sure what to do. So, she uses Abbott’s decision-making AID to decide on a course of action that supports Abbott’s values. |  |
| [Screen 47](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=56_C_52) [56\_C\_52](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=56_C_52)  | AIDAssessImpactDecideAIDAssessImpactDecideNo?YesIs it legal?Your action may have serious consequences for you and the company. Do not proceed.Contact Legal for advice.Does it comply with Abbott policy?No?YesDoes it align with Abbott values and culture?No?YesHow will this affect the patients and consumers of Abbott?Take a minute to consider whether their interests are balanced with those of the company. Once you are done, click next.NextCould this affect Abbott's reputation?Would you be concerned if this appeared in the news or headlines?NextCould this have an impact on any of Abbott's other stakeholders?NextIf you feel confident your decision balances the interests of all stakeholders, proceed.The AID begins by asking a series of questions to determine if the proposed course of action is legal, compliant with Abbott policies, and aligned to Abbott values and culture.The first question the AID asks is whether the proposed course of action is legal.If Sara were to select “No,” the AID would caution that the action could have serious consequences and would urge her not to proceed.If she were to select Unsure, the AID would provide guidance on available resources or where to turn for support.In this particular case, Sara is confident that her actions have been in compliance with the law:* She spoke to her manager about a potential conflict of interest, and
* The best candidate was ultimately hired,

so, she selects the “Yes” option.The AID then asks Sara to consider whether her actions comply with Abbott policy.Abbott’s Global Procurement policy states that suppliers must be selected based on criteria such as low bid, high quality, and lowest total cost.Sara has complied fully with the policy, so she selects the “Yes” option.The AID then asks Sara whether her actions are aligned with Abbott values and culture.Sara thinks about the commitment that Abbott employees make to hold themselves to the highest ethical standards and to operate with honesty, fairness, and integrity in everything they do.She knows that she has acted honestly and transparently in this situation, so again, she selects the “Yes” option.Sara is now prompted to evaluate the possible impact of her decision to hire a relative of her manager on Abbott and its stakeholders.The AID begins by asking Sara to consider whether the interests of patients and consumers have been balanced with those of the company.This prompts Sara to think about the fee that was negotiated with the distributor, and how it might impact the costs charged to patients and consumers.Sara confirms that the fee was well within fair market value and that hiring Luisa would likely lower costs for patients and consumers.Next, Sara is prompted to consider how her decision to hire a relative of her manager could affect Abbott’s reputation.She imagines a newspaper headline reporting that a senior Abbott manager outsourced a large contract to a family member.She thinks about the impact on Abbott’s reputation, and realizes that, even if the allegation proved unfounded, it could negatively affect patient and consumer trust in the Abbott brand.Then, the AID prompts her to consider Abbott’s other stakeholders.This leads Sara to think about the impact the rumors are having on staff morale and the reputation of her manager.Sara realizes that by failing to take action, she will be contributing to the negative atmosphere that’s arisen around the allegation.And finally, the AID encourages Sara to move forward with a course of action that balances the interests of all stakeholders. |  |
| [Screen 48](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=57_C_63) [57\_C\_63](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=57_C_63)  | So, Sara begins the process by speaking to her manager, Daniel, to give him the opportunity to address the concerns the others have raised.It turns out that Daniel and Luisa are, in fact, related.And even though Daniel believes his instruction to hire Luisa was in the best interest of Abbott, he thanks Sara for raising a concern and decides to disclose the potential conflict of interest to the Office of Ethics and Compliance. |  |
| [Screen 49](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=58_C_64) [58\_C\_64](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=58_C_64)  | Sara’s decision to confront her manager wasn’t easy.But the decision-making AID helped her to define a course of action that not only is legal, compliant with Abbott policies, and aligned to Abbott’s values and culture, but that also balances the interests of all Abbott’s stakeholders. |  |
| [Screen 50](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=59_C_65) [59\_C\_65](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=59_C_65)  | The decision-making AID is available both within the electronic Code of Business Conduct and via the OEC website.We hope that you will find it useful in helping you work through issues where the best path forward is not obvious. |  |
| [Screen 51](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=60_C_66) [60\_C\_66](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=60_C_66)  | If you are unsure or have any questions about your role and responsibilities in respect to the Code of Business Conduct, it is usually best to speak to your manager first. Your manager knows you and your work environment and is closest to the issues. The Office of Ethics and Compliance (OEC) and Legal are also resources that can help you analyze the situation and brainstorm alternatives.If you have concerns about potential violations of the Code of Business Conduct, report the concerns to the OEC (investigations@abbott.com) or Legal, or via the multilingual [Ethics and Compliance Speak Up Helpline](https://secure.ethicspoint.com/domain/media/en/gui/40393/index.html) available globally 24/7. |  |
| [Screen 52](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=61_C_67) [61\_C\_67](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=61_C_67)  | Because there are situations where the right course of action is hard to determine, Abbott has developed a decision making AID.ABOUT ABBOTT’S DECISION-MAKING AIDThe decision-making AID is an online tool that is designed to help you think through alternatives when faced with a difficult decision. It encourages you to ask the right kinds of questions to ensure that you define a course of action that supports the principles embodied in our Code.ASSESS THE SITUATIONThe first step in the decision-making AID process is an assessment of the facts of the situation to determine if your proposed course of action is legal, compliant with our policies, and aligned to our values and culture.EVALUATE THE IMPACTThe second step in the decision-making AID process is an evaluation of the impact your decision will have on patients and consumers, Abbott’s reputation, and other stakeholders.DECIDEOnce you have finished evaluating the possible impact of your decision, you are encouraged to select a course of action that balances the interests of all. If you are still unsure about the right course of action, speak to your manager, the Office of Ethics and Compliance, Human Resources, and/or the Legal Division.OTHER RESOURCES AND SUPPORTIf you have a question about your role and responsibilities in respect to the Code, your manager, the Office of Ethics and Compliance (OEC), and Legal can help you analyze the situation and brainstorm alternatives.If you have a concern about a suspected violation, you can report your concern anonymously via email to investigations@abbott.com or via the multilingual [Ethics and Compliance Speak Up Helpline](https://secure.ethicspoint.com/domain/media/en/gui/40393/index.html) available globally 24/7. |  |
| [Screen 53](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=62_C_68) [62\_C\_68](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=62_C_68)  | MANAGER OR SUPERVISORIf 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.GLOBAL POLICY PORTALFor our corporate policies and procedures applicable companywide, visit the [Global Policy Portal](https://abbott.sharepoint.com/sites/AW-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.* OEC Website – Refer to the [OEC website](https://abbott.sharepoint.com/sites/AW-Ethics_Compliance) 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.
* 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, Divisional, and local OEC support is available. Please locate your Compliance Contact via the [iComply](https://icomply.abbott.com/Default.aspx) site.
* Ethics and Compliance Speak Up Helpline – Visit our multilingual [Ethics and Compliance Speak Up Helpline](https://secure.ethicspoint.com/domain/media/en/gui/40393/index.html) 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 to report a potential violation. 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](https://icomply.abbott.com/Default.aspx) to access compliance-related applications and resources geared towards interactions with Healthcare Professionals and Healthcare Organizations, as well as third parties.

HUMAN RESOURCESFor employee-related issues, such as concerns involving management and/or other employees, contact your local [Human Resources representative](https://abbott.sharepoint.com/sites/myhr/).Legal DivisionIf you have questions about the laws, regulations, and acceptable business practices, the [Legal Division](https://abbott.sharepoint.com/sites/AW-Abbott-Legal) can assist you.Other ResourcesThere are many other resources available to you:* Finance – If your question is about accounting or finance, contact your local Finance department.
* Corporate Audit – If you have specific concerns regarding accounting, internal accounting controls, or auditing matters, promptly report them to Corporate Audit or the OEC.
* Abbott Quality and Regulatory – If you have questions about the quality and safety of our products, contact your local Quality or Regulatory department.
* Global Environment, Health, and Safety – Contact a Global Environment, Health, and Safety representative if you have questions about a physical site and potential dangers.
* Global Procurement – If you have questions about supplier relations, contact Global Procurement.
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| [Screen 54](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=63_C_69) [63\_C\_69](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=63_C_69)  | Quick Reference CardsClick [here](file:///C%3A%5Cdev%5CAbbottCOBCCourse2%5Ccourses%5CEN-US%5Ctranslation%5Creference%5CQuick_Reference.pdf) to review summaries of each section of this course.Course TranscriptClick [here](file:///C%3A%5Cdev%5CAbbottCOBCCourse2%5Ccourses%5CEN-US%5Ctranslation%5Creference%5CTranscript.pdf) for a full transcript of the course. |  |
| [Screen 55](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=64_C_70) [64\_C\_70](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=64_C_70)  | The Knowledge Check consists of 10 questions. You must score 80% or higher to successfully complete this course.When you are ready, click the Knowledge Check button. |  |
| Screen 56Question 1: Scenario65\_C\_71 | Our Code of Business Conduct:Check all that apply.[1] Reflects our proud heritage.[2] Reminds us of our common purpose to improve people’s lives.[3] Describes the responsibilities, behaviors, and expectations Abbott has of us.Our Code of Business Conduct includes all of these elements and applies to all aspects of Abbott’s business.The Code of Business Conduct is critically important because it provides:[1] Specific advice on all the different kinds of situations we are likely to encounter as we represent Abbott in our daily work.[2] A clear set of principles and values on which to base decisions when the best course of action is not immediately clear.While it is impossible for our Code of Business Conduct to provide specific advice on every situation we are likely to encounter, it provides us with a clear set of principles and values on which to base decisions when the best course of action is not immediately clear.To help you incorporate the Code of Business Conduct into your daily work, the Code provides:Check all that apply.[1] Concise descriptions of Abbott’s expectations.[2] Clear explanations of why we have established certain standards.[3] A Speak Up area that provides information on who to contact if you have a question or a concern.[4] A decision making AID to help in situations where the right course of action is hard to determine.To help you incorporate the Code of Business Conduct into your daily work, the Code includes all of these elements: guidance about Abbott’s expectations; why Abbott has established certain standards; a Speak Up area; and a decision-making AID.A colleague at Abbott is interviewing candidates for an open position. Because the job role will require a lot of travel time, he decides at the outset to exclude women with young children from the interview process.Based on the principles explained in the Code, do you think this is okay?[1] Yes. While Abbott embraces diversity across the organization, and is committed to attracting, developing and retaining talented individuals, the Code recognizes the need for managers and supervisors, as leaders in the organization, to base their decisions on the needs of the business. In this case, the business needs to hire someone who is flexible to travel.[2] No. The Code makes clear our commitment to provide equal opportunities for all employees regardless of race, color, religion, creed, age, gender, etc. Employment decisions must be based on relevant criteria, such as the skills, experience, and relevant work performance of candidates, not on gender stereotypes.The manager’s hiring decision should be based on relevant criteria, such as the skills, experience, and relative work performance of the candidates, and not on gender-based stereotypes.Which of the following anti-bribery principles set forth in the Code apply to Abbott?Check all that apply:[1] As we market and sell our products, we educate and inform healthcare professionals, but do not interfere with their independent professional judgments.[2] It is never permissible to offer or provide anything that directly or indirectly benefits a government official, healthcare professional, or any other person, in order to make a sale, secure a business advantage, or reward previous or existing business with Abbott.[3] We must proactively manage relationships with service providers 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.[4] Our financial books, internal records and documentation, and public statements must accurately reflect the substance and facts of our actions.The Code makes it clear that Abbott actively opposes fraud, bribery, and corruption. We get business done the right way by complying with all of these anti-bribery principles.A manager has a strong suspicion that one of her staff is knowingly entering receipts for expenses he does not actually incur on his expense report. The manager is aware that, according to the Code of Business Conduct, she has an affirmative duty to report violations. However, in this case, she has no concrete proof that the staff member is actually falsifying his expense report.What does the Code require the manager to do in this situation?[1] Investigate the situation independently, and report the incident only if she is convinced that this is an actual violation.[2] Report the suspected violation.[3] Nothing. The Code requires her to report actual, not suspected, violations.Managers and supervisors have a fundamental responsibility to ensure that employees understand and are held accountable to the Code. The manager should contact the Office of Ethics and Compliance regarding the potential violation. She should not conduct her own investigation.An Abbott employee, who has recently been handed responsibility for awarding a large catering contract, has a close family member who runs a catering servicing company. The family member offers to provide catering services to Abbott at a rate that is 25% lower than the closest competitor.Based on the principles set out in the Code of Business Conduct, the Abbott employee responsible for the business decision should:[1] Disqualify the family member’s company from the selection process, since there is a clear conflict of interest.[2] Disclose the potential conflict of interest to his manager and recommend that the manager review the facts and make the decision.[3] Award the contract to his family member’s company, since it is in the best interests of Abbott.There are two basic principles underlying Abbott’s position on conflicts of interest. The first is that we place the interests of Abbott above our own or those of our family and friends. The second is that we will address and resolve conflicts of interest before moving forward. In this case, if the Abbott employee were to award the contract to his family member, it could be perceived as a potential conflict of interest. As such, the employee should disclose the potential conflict of interest to his manager.Margarite works in manufacturing at Abbott. Every time she completes a process on a particular product, she is required to conduct a quality test. Recently, because of work demands, she was unable to complete a test until a few days after it was scheduled. Since the test results were fine, Margarite’s manager tells her to back-date the results, but he counsels her for negligence – warning her that in the future the test must be conducted on time and according to schedule.Based on the principles set out in the Code of Business Conduct, has Margarite’s manager acted appropriately?[1] Yes. Even though the quality results were fine, Margarite’s manager was right to counsel her – and to remind her of her responsibility to ensure that in the future the test is completed on time and according to schedule.[2] Yes. Margarite’s manager has a responsibility to make sure the quality test is completed as scheduled.[3] No. Regardless of how the manager deals with Margarite’s mistake, no Abbott employee has the right to ask another employee to create a false or misleading entry, record, or report.The Code makes it clear that our financial books, internal records and documentation, and public statements must accurately reflect the substance and facts of our actions. The facts must be presented in sufficient context and with adequate support to understand the true nature of our activities or transactions.Abbott’s decision making AID is designed to help us make decisions that are:Check all that apply.[1] Legal.[2] Compliant with Abbott policies.[3] Aligned with Abbott’s values and culture.[4] Supported by the principles described in the Code of Business Conduct.[5] In the best interests of Abbott’s patients, consumers, and other stakeholders.Abbott’s decision-making AID is designed to help us make decisions that are: legal; compliant; aligned with Abbott’s values and culture; supported by the principles in the Code; and in Abbott’s best interest.If you have a question about your specific obligations relating to the Code of Business Conduct, it is usually best to speak to \_\_\_\_\_\_\_\_\_\_\_\_\_ first.[1] The OEC[2] HR[3] Your manager[4] LegalIf you are unsure or have any questions about your role and responsibilities in respect to the Code of Business Conduct, it is usually best to speak to your manager first. Your manager knows you and your work environment and is closest to the issues.All questions remain unanswered |  |
| [Screen 57](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=66_C_72) [66\_C\_72](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=66_C_72)  | No results are available as you have not completed the Knowledge Check.Congratulations! Thank you for completing this course.In addition to this course, you must also complete a separate Code of Business Conduct Certification, which represents your commitment to comply with the standards contained in the Code and all related policies and procedures as applicable to your work responsibilities.Please review your results below by clicking on each question.Once you're done, click the forward arrow to take a short survey.Sorry, you did not pass the Knowledge Check. Take a few minutes to review your results below by clicking on each question.When you are done, click the Retake Knowledge Check button. |  |
| [Screen 58](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=67_C_73) [67\_C\_73](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=67_C_73)  | This survey is optional.Important: Whether you choose to complete the survey or not, you must click the EXIT (X) icon in the course title bar to complete the course and upload your results. |  |
| [Screen 58](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=68_C_73) [68\_C\_73](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=68_C_73)  | [1] How would you rate this course overall?BadPoorAverageGreatExcellent |  |
| [Screen 58](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=69_C_73) [69\_C\_73](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=69_C_73)  | [2] Please further explain your rating. |  |
| [Screen 58](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=70_C_73) [70\_C\_73](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=70_C_73)  | [3] As a result of this session, I have a better understanding of Code of Business Conduct.Strongly DisagreeDisagreeNeutralAgreeStrongly Agree |  |
| [Screen 58](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=71_C_73) [71\_C\_73](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=71_C_73)  | [4] To what extent is the content covered in this course relevant to your work?Not at All RelevantNot Really RelevantUndecidedSomewhat RelevantVery Relevant |  |
| [Screen 58](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=72_C_73) [72\_C\_73](http://www.learnex.co.uk/test/AbbottCOBCCourse2/courses/EN-US/course/index.html?showScreen=72_C_73)  | [5] Which of the topics covered in this course would you like to learn more about?Click the Upload button to complete the course, upload your data, and close the course window.Upload |  |
| 73\_toc\_1 | Introduction |  |
| 74\_toc\_2 | Welcome |  |
| 75\_toc\_3 | Objectives |  |
| 76\_toc\_4 | Tutorial |  |
| 77\_toc\_5 | Our Code |  |
| 78\_toc\_6 | Overview |  |
| 79\_toc\_7 | Why Our Code is Important |  |
| 80\_toc\_8 | How to Use Our Code |  |
| 81\_toc\_9 | Our Code: Quick Reference |  |
| 82\_toc\_10 | What it Says |  |
| 83\_toc\_11 | Overview |  |
| 84\_toc\_12 | Our Customers |  |
| 85\_toc\_13 | Our Products |  |
| 86\_toc\_14 | Advancing Science |  |
| 87\_toc\_15 | Our People |  |
| 88\_toc\_16 | Our Communities |  |
| 89\_toc\_17 | How We Operate |  |
| 90\_toc\_18 | What it Says: Quick Reference |  |
| 91\_toc\_19 | Decision-Making |  |
| 92\_toc\_20 | Overview |  |
| 93\_toc\_21 | Decision-Making AID |  |
| 94\_toc\_22 | Other Resources and Support |  |
| 95\_toc\_23 | Decision-Making: Quick Reference |  |
| 96\_toc\_24 | Resources |  |
| 97\_toc\_25 | Where to Get Help |  |
| 98\_toc\_26 | Reference Material |  |
| 99\_toc\_27 | Knowledge Check |  |
| 100\_toc\_28 | Introduction |  |
| 101\_toc\_29 | Knowledge Check |  |
| 102\_toc\_30 | Question 1 |  |
| 103\_toc\_31 | Question 2 |  |
| 104\_toc\_32 | Question 3 |  |
| 105\_toc\_33 | Question 4 |  |
| 106\_toc\_34 | Question 5 |  |
| 107\_toc\_35 | Question 6 |  |
| 108\_toc\_36 | Question 7 |  |
| 109\_toc\_37 | Question 8 |  |
| 110\_toc\_38 | Question 9 |  |
| 111\_toc\_39 | Question 10 |  |
| 112\_toc\_40 | Feedback |  |
| 113\_toc\_41 | Survey |  |
| 114\_string\_1 | The Course cannot contact the LMS. Click 'OK' to continue and review the course. Note, Course Certification may not be available. Click 'Cancel' to exit |  |
| 115\_string\_2 | All questions remain unanswered |  |
| 116\_string\_3 | Questions |  |
| 117\_string\_4 | Question |  |
| 118\_string\_5 | not answered |  |
| 119\_string\_6 | That's correct! |  |
| 120\_string\_7 | That's not correct! |  |
| 121\_string\_8 | Feedback:  |  |
| 122\_string\_9 | Code of Business Conduct |  |
| 123\_string\_10 | Knowledge Check |  |
| 124\_string\_11 | Submit |  |
| 125\_string\_12 | Retake Knowledge Check |  |
| 126\_string\_13 | Our Code of Business Conduct is a critically important document that describes our company’s expectations of every employee as we represent Abbott in our daily work. It 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. This course provides a high level overview of the Code, outlines our company's expectations and your obligations, and provides practical advice on what to do when the best path forward is hard to determine. The course will take 35-45 minutes to complete. |  |
| 127\_string\_14 | Table of Contents |  |
| 128\_string\_15 | Where to Get Help |  |
| 129\_string\_16 | Reference Material |  |
| 130\_string\_17 | Audio |  |
| 131\_string\_18 | Exit |  |
| 132\_string\_19 | Record My Results |  |