|  |  |  |
| --- | --- | --- |
| [Screen 0](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=1_C_1)  [1\_C\_1](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=1_C_1) | Conflicts of Interest  Click the forward arrow to begin. |  |
| [Screen 1](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=2_C_2)  [2\_C\_2](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=2_C_2) | Conflicts of interest can create bad publicity, damage a company’s reputation and goodwill, lower employee morale, and interfere with a company’s performance.  In this course, you will learn how to recognize, disclose, and report conflicts of interest to protect yourself and Abbott from serious unintended consequences. |  |
| [Screen 2](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=3_C_3)  [3\_C\_3](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=3_C_3) | Upon completion of this course, you will be able to:   * Define conflicts of interest * Explain the potential impact of conflicts of interest on Abbott and its stakeholders * Recognize different types of conflicts of interest * Disclose and request approval for your own conflicts of interest * Report apparent conflicts of interest involving other employees * Identify the resources to go to for help and support |  |
| [Screen 3](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=4_C_4)  [4\_C\_4](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=4_C_4) | 1 | The Impact of Conflicts of Interest  Here you will learn what a conflict of interest is and why avoiding conflicts of interest matter.  3 Minutes  Section 1 | The Impact of Conflicts of Interest  Conflicts of Interest Defined  Why Avoiding Conflicts of Interest Matters  Review  2 | Types of Conflicts of Interest  Here you will learn how to recognize and resolve different types of conflicts of interest.  12 Minutes  Section 2 | Types of Conflicts of Interest  Financial Interests  Family Members  Gifts, Payments, and Other Inducements  Corporate Opportunities  Outside Employment and Consulting  Serving on Boards or as Officers for Third Parties  Review  3 | Disclosing and Reporting Conflicts of Interest  Here you will learn how to disclose and report conflicts of interest.  6 Minutes  Section 3 | Disclosing and Reporting Conflicts of Interest  Disclosing Your Own Conflict of Interest  Reporting Someone Else’s Conflict of Interest  Annual Conflicts of Interest Certification  Where to Go for Help and Support  Review  4 | Knowledge Check  Assess your understanding of the key concepts and principles of this course.  5 Minutes  Section 4 | Knowledge Check  Assessment  Click the panel to get started.  Click the yellow play button to begin.  This content is not yet available. You must complete Section{a} {b}. |  |
| [Screen 4](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=5_C_8)  [5\_C\_8](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=5_C_8) | What is a conflict of interest?  A conflict of interest exists whenever an Abbott employee’s private interests interfere, or appear to interfere, with Abbott’s interests.  In other words . . . a conflict of interest exists when an individual can personally benefit from his or her position as an employee or when an individual’s personal investments, interests, or associations can interfere with Abbott’s interests.  Rather than making decisions for the benefit of customers, patients, and the company, the employee might make decisions based on his or her own personal gain. |  |
| [Screen 5](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=6_C_9)  [6\_C\_9](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=6_C_9) | Here is an example.  A plant supervisor decides to hire his brother’s company to provide security arrangements at an Abbott facility.  From the outside, it could appear that the plant supervisor has a personal interest in helping his brother’s company to get a new client.  His personal interest could conflict with Abbott’s interest, which is to hire the best security company available, at the lowest possible price.  As a result, there is a conflict of interest. |  |
| [Screen 6](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=7_C_10)  [7\_C\_10](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=7_C_10) | Avoiding conflicts of interest matters, because, as employees of Abbott, we have been entrusted with representing the interests of our customers, consumers, employees, investors, and the communities in which we operate.  By putting, or appearing to put, our personal interests above those of Abbott’s stakeholders, we erode that trust – which in turn can affect the reputation and performance of our company.  By putting our own interests above Abbott’s interests, we also put our personal reputations on the line and risk being subject to disciplinary action. |  |
| [Screen 7](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=8_C_11)  [8\_C\_11](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=8_C_11) | Click the images below to learn more about the effect conflicts of interest can have on Abbott’s stakeholders.  Employees  Conflicts of interest could cause job applicants and employees to question whether they want to be part of an organization where hiring and promotional decisions are based on family ties or friendships, rather than merit.  Business Partners  Conflicts of interest could cause business partners to reconsider bidding on work because of the perception that Abbott only awards contracts to companies that offer gifts or other forms of inducement.  Investors  Conflicts of interest could affect Abbott’s reputation with the investment community and reduce investors’ willingness to invest in the company.  Customers  Conflicts of interest could cause customers to question whether Abbott employees are putting their personal interests above the interests of Abbott’s customers.  Colleagues  Conflicts of interest could place an extra burden on an employee’s colleagues and jeopardize a team’s success. |  |
| [Screen 8](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=9_C_12)  [9\_C\_12](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=9_C_12) | Every situation that involves an actual or potential conflict of interest is unique.  Having a conflict of interest does not automatically prohibit you from pursuing the desired activity or working at Abbott. Oftentimes, conflicts of interest can be resolved by taking certain actions to minimize or eliminate the conflict and avoid any impact to Abbott’s business. |  |
| [Screen 9](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=10_C_12b)  [10\_C\_12b](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=10_C_12b) | For example, a sales representative learns that his relative recently got a job at an Abbott customer he calls on.  This conflict can be resolved by assigning a different sales representative to that customer. The key is to openly communicate the conflict to your manager, so the circumstances can be assessed and addressed appropriately. |  |
| [Screen 10](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=11_C_13)  [11\_C\_13](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=11_C_13) | Click the arrow to begin your review.  Review  Take a moment to review some of the key concepts in this section.  Conflicts of Interest Defined  A conflict of interest exists whenever an Abbott employee’s private interests interfere, or appear to interfere, with Abbott’s interests.  Why Avoiding Conflicts of Interest Matters  By putting, or appearing to put, our personal interests above those of our stakeholders, we erode trust - which can affect the reputation and performance of Abbott.  The Key to Resolving Conflicts of Interest  The key to resolving conflicts is to openly communicate the conflict to your manager, so the circumstances can be assessed and addressed appropriately.  To check your progress, click the Menu button.  You have completed section 1 of 4  Click the forward arrow to continue learning |  |
| [Screen 11](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=12_C_14)  [12\_C\_14](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=12_C_14) | Conflicts of interest generally fall into six broad categories. Let’s begin by looking at an example of a financial conflict of interest. |  |
| [Screen 12](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=13_C_16)  [13\_C\_16](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=13_C_16) | Imagine...  Katya, a sales operations coordinator, has part ownership in a small travel agency.  When Katya learns that Abbott is seeking to partner with a new travel vendor, she engages the services of her company.  CLICK THE BUTTON BELOW TO LEARN WHY THIS IS A CONFLICT OF INTEREST.  WHY IS THIS A CONFLICT?  Why is this a conflict?  This is a conflict because Katya, as part owner of the travel agency, could place her own personal interest – getting work for her travel company and maximizing her profit – above Abbott’s business interest, which is to partner with the best travel agency available and keep travel costs as low as possible. |  |
| [Screen 13](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=14_C_17)  [14\_C\_17](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=14_C_17) | Abbott’s Concerns Relating to Financial Conflicts  When employees, like Katya, own or invest in a supplier, customer, or competitor of Abbott, they may use their positions at Abbott to benefit the outside entity, at Abbott’s expense.  Similarly, Abbott employees’ outside interests could cause them to fail to take some action when it would be in Abbott’s best interest.  Finally, there is also a risk that employees could disclose confidential information. |  |
| [Screen 14](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=15_C_18)  [15\_C\_18](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=15_C_18) | How does Abbott define a financial conflict of interest?  Financial conflicts of interest exist when an Abbott employee has a material investment, ownership interest, or other financial interest in a business entity that conducts or seeks to conduct business with Abbott or is a competitor of Abbott. |  |
| [Screen 15](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=16_C_19)  [16\_C\_19](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=16_C_19) | When is an investment, ownership interest, or financial interest considered material?  The answer depends on a variety of factors, including, potentially, what percentage of an employee’s assets is represented by the interest and/or the percentage of the vendor or competitor owned by the employee, but ultimately it is determined by whether the interest is so significant that it may influence the employee’s decisions on behalf of Abbott.  Given that this is not always clear, all potential financial conflicts of interest must be disclosed. |  |
| [Screen 16](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=17_C_20)  Activity: Scenario  [17\_C\_20](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=17_C_20) | Imagine...  Sasha, a sales manager, learns that a group of his colleagues arranged a holiday event for their division. The restaurant selected just happens to be a restaurant that Sasha owns.  Since Sasha played no part in the decision-making process, he decides not to bring up his ownership of the restaurant.  That's not correct!  That's correct!  That's partially correct!  This is a conflict of interest.  Even though Sasha has played no part in the decision-making process, there could be the perception that Sasha, as the owner of the restaurant, may use his position at Abbott to benefit the restaurant at Abbott’s expense.  Sasha should immediately talk to his manager. His manager may consult with the Office of Ethics and Compliance (OEC) and/or Legal as needed.  Is this a conflict of interest?  [1] Yes  [2] No  Submit |  |
| [Screen 17](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=18_C_21)  Activity: Scenario  [18\_C\_21](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=18_C_21) | That's not correct!  That's correct!  That's partially correct!  It is most likely that Sasha’s manager will suggest that he play a passive role in the restaurant’s dealings with Abbott by:   * Staying out of negotiations, * Taking no part in initiating or approving payments, and * Avoiding supervising the work his restaurant performs on behalf of Abbott.   The conflict can be resolved by a combination of actions above.  Sasha has disclosed the conflict of interest to his manager. What action do you think his manager might suggest to resolve the issue?  [1] Sasha should not be involved in any negotiations involving the restaurant.  [2] Sasha should not participate in initiating or approving payments to the restaurant.  [3] Sasha should avoid supervising the work his restaurant performs on behalf of Abbott.  [4] All of the above.  Submit |  |
| [Screen 18](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=19_C_22)  [19\_C\_22](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=19_C_22) | Let’s now consider conflicts of interest involving family members. |  |
| [Screen 19](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=20_C_23)  [20\_C\_23](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=20_C_23) | Imagine...  Sonia, an IT manager, is in the process of hiring an external consultant to manage a critical project in her department.  Her brother, Javier, bids for the project. Javier is the best candidate for the job – he is an excellent project manager with a proven record in managing this type of project – and Sonia decides to hire him.  CLICK THE BUTTON BELOW TO LEARN WHY THIS IS A CONFLICT OF INTEREST.  WHY IS THIS A CONFLICT?  Why is this a conflict?  This is a conflict because Sonia, as the person responsible for hiring the external consultant, may place her personal interest – hiring her brother, Javier – above Abbott’s business interest, which is to hire the best consultant for the job at the lowest cost possible.  Although Sonia may think her brother is the best candidate for the job, there may be other qualified and more cost-effective candidates.  In addition, by hiring a family member, she is likely to create the perception that her personal interests are in conflict with Abbott’s interests.  Remember, perceptions matter! |  |
| [Screen 20](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=21_C_24)  [21\_C\_24](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=21_C_24) | How does Abbott define conflicts involving family members?  Conflicts involving family members occur when an Abbott employee conducts or seeks to conduct business on behalf of Abbott with a family member. Per Abbott’s Corporate Human Resources Employment of Relatives policy (C-114), a “family member” includes a:   * Spouse * Domestic Partner * Parent * Parent-in-law * Sibling * Sibling-in-law * Child * Son/daughter-in-law * Step-parent * Step-sibling * Step-child * Any member of an employee’s household |  |
| [Screen 21](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=22_C_25)  [22\_C\_25](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=22_C_25) | Abbott’s Concerns Relating to Conflicts Involving Family Members  Conflicts involving family members create a risk that the Abbott employee may not act in the best interest of Abbott.  Further, the Abbott employee may pass along (even unintentionally) confidential information.  Therefore, individual Abbott employees must not do business on behalf of Abbott with family members or companies owned directly or indirectly by family members. |  |
| [Screen 22](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=23_C_26)  [23\_C\_26](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=23_C_26) | Personal Friends  Employees should also consider carefully the same principles when doing business with personal friends and others with whom they have close relationships but who do not meet the definition of a “family member.” Although doing business on behalf of Abbott with a friend does not necessarily create a conflict of interest, there is a danger that gifts and other interactions in the context of the friendship may be perceived as inappropriate business interactions. |  |
| [Screen 23](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=24_C_27)  Activity: Scenario  [24\_C\_27](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=24_C_27) | Imagine...  Sanjeet, a product manager, is given responsibility for leading the launch of a new cardiovascular device in an emerging market.  Sanjeet is looking to hire a distributor.  As it happens, Sanjeet is friends with a former Abbott employee, who recently left the company to start up his own distributorship franchise.  Since his friend has an excellent reputation from his days at Abbott, Sanjeet ignores the normal vetting process and awards the contract to his former colleague.  That's not correct!  That's correct!  That's partially correct!  It was not appropriate to bypass the normal vetting process, even if he was sure his friend's company was the best choice. Doing so could be perceived as a conflict of interest.  Did Sanjeet handle the distributor selection process appropriately?  [1] Yes  [2] No  Submit |  |
| [Screen 24](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=25_C_28)  Activity: Scenario  [25\_C\_28](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=25_C_28) | What do you think is the best way to resolve this conflict?  That's not correct!  That's correct!  That's partially correct!  Sanjeet should remove himself from the decision-making process, and another product manager should be tasked with hiring the distributor.  Sanjeet’s friend should not be excluded from the process, since it is in Abbott’s best interest to hire the best candidate for the job. Giving the hiring responsibility to another product manager would avoid the potential conflict of interest.  What do you think is the best way to resolve this conflict?  [1] Sanjeet should exclude his friend from the vetting process.  [2] A different product manager should be tasked with hiring the distributor.  Submit |  |
| [Screen 25](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=26_C_29)  [26\_C\_29](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=26_C_29) | Let’s now look at conflicts of interest involving gifts, payments, and other inducements. |  |
| [Screen 26](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=27_C_30)  [27\_C\_30](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=27_C_30) | Imagine...  Seiko, an administrative assistant, is responsible for recommending and booking meeting and hotel rooms for company events, such as business and training meetings.  One day, a hotel where she regularly books rooms sends an email offering her a free suite for a two-day stay at the hotel. The email states that it is in appreciation for past business. It does not ask Seiko for her continued business.  CLICK THE BUTTON BELOW TO LEARN WHY THIS IS A CONFLICT OF INTEREST.  WHY IS THIS A CONFLICT?  Why is this a conflict?  This is a conflict because Seiko, as the person responsible for booking rooms on Abbott’s behalf, may place her personal interest – receiving free stays at the hotel – above Abbott’s business interest, which is to get the best rooms at the lowest price for the company.  Even if the hotel does not ask Seiko for her continued business, or Seiko does not feel obligated to return the favor, the free offer could influence her future decision-making.  It could also appear to others that the hotel is influencing Seiko’s purchasing decisions. |  |
| [Screen 27](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=28_C_31)  [28\_C\_31](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=28_C_31) | Abbott’s Concerns Relating to Gifts, Payments, and Other Inducements  Accepting gifts, payments, and other inducements from a supplier, vendor, or other business associate of Abbott creates a potential conflict of interest, as it might influence or give the appearance of influencing an employee’s purchasing decisions. |  |
| [Screen 28](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=29_C_32)  [29\_C\_32](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=29_C_32) | Gifts, payments, and other inducements may be accepted only in accordance with the Global Purchasing policy, Purchasing Code of Conduct for Interacting with Suppliers (CPP 40), or any applicable affiliate policy.  CPP 40 covers interactions with suppliers, vendors, or other business associates of Abbott.  CLICK EACH OF THE PANELS TO LEARN WHAT CPP 40 SAYS ABOUT GIFTS, MEALS, EVENTS, AND TRAVEL.  Gifts  Gifts   * May not be solicited and are strongly discouraged * Must be reasonable and nominal in value (in the U.S. and Puerto Rico, the amount should be less than $25) * Cannot be personal in nature * Cash and cash equivalents (gift cards or gift certificates) must not be accepted   Meals  Meals are an acceptable part of a business relationship. However, they must be:   * Part of a business conversation * Infrequent (no more than one lunch every 6 months and one dinner every 12 months with the same supplier) * Reasonable in price * Reciprocal * Cannot include guests of the recipients   Supplier or Association Sponsored Events  Events (for example, sporting events, theater, concerts, holiday parties, and other types of entertainment events) are an acceptable part of a business relationship and must:   * Not be more than one day * Be non-lavish and infrequent (maximum 3 per year total, 1 per supplier) * Not include large numbers of Abbott employees * Not include spouses * Receive management approval   Tickets to events are only acceptable when accompanied by the supplier and require advance Purchasing management or Affiliate General Manager approval. Tickets for personal use may NOT be accepted, even if paid for by the employee.  Travel  Travel, including trade shows, site visits, or business conferences:   * Must be for a legitimate business purpose and * Must not be paid by suppliers |  |
| [Screen 29](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=30_C_33)  Activity: Scenario  [30\_C\_33](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=30_C_33) | Imagine...  Isabella, an Abbott Public Affairs Director, is offered two tickets in a luxury section for a theatrical show by a firm that wants to perform consulting services for Abbott. Isabella accepts the tickets and plans to bring her husband along. She does not mention the event to her manager.  That's not correct!  That's correct!  That's partially correct!  This is a conflict of interest because the requirements of CPP 40 have not been met:   * Isabella has not received her manager’s approval to attend the event, * The tickets are for the luxury seating, which does not meet the requirement that events must be non-lavish, and * Isabella plans to bring her husband along, which does not meet the requirement that spouses may not attend supplier events.   If Isabella were to attend (and bring her husband along), she could create the perception that any future business she might do with the potential vendor is a result of the tickets she received.  Is this a conflict of interest?  [1] Yes  [2] No  Submit |  |
| [Screen 30](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=31_C_34)  [31\_C\_34](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=31_C_34) | Now let’s look at conflicts of interest involving corporate opportunities. |  |
| [Screen 31](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=32_C_35)  [32\_C\_35](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=32_C_35) | Imagine...  Lara, a marketing manager for Abbott Nutrition, becomes aware of an opportunity to become part-owner of a start-up company that would produce nutrition mini-bars for kids with diabetes.  Since Abbott does not currently produce this product, Lara feels its OK to move forward with her plan.  CLICK THE BUTTON BELOW TO LEARN WHY THIS IS A CONFLICT OF INTEREST.  WHY IS THIS A CONFLICT?  Why is this a conflict?  This is a conflict because Lara’s business would be a logical extension of Abbott’s current business. Lara must first disclose the opportunity to Abbott, so Abbott can evaluate whether it wishes to make the investment. |  |
| [Screen 32](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=33_C_36)  [33\_C\_36](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=33_C_36) | How does Abbott define a corporate opportunity?  Abbott defines a corporate opportunity as a business opportunity that would be a logical extension of Abbott’s current business or would be in competition with Abbott’s business. |  |
| [Screen 33](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=34_C_37)  [34\_C\_37](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=34_C_37) | Abbott’s Concern Relating to Conflicts Involving Corporate Opportunities  An employee might pursue an opportunity that Abbott itself would be interested in pursuing. |  |
| [Screen 34](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=35_C_38)  [35\_C\_38](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=35_C_38) | Abbott’s Requirements  There is no action that could minimize or eliminate conflicts of interest involving corporate opportunities.  If an Abbott employee becomes aware of a business opportunity that is a logical extension of Abbott’s current business, or would be in competition with Abbott’s business, the employee must offer the opportunity to Abbott by disclosing it to the head of his or her division before acting on it personally.  This is required whether the employee becomes aware of the opportunity while doing his or her Abbott job, or in a personal capacity. |  |
| [Screen 35](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=36_C_40)  Activity: Scenario  [36\_C\_40](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=36_C_40) | Imagine...  Serena, a Business Development Manager, learns that a small company developing a new cardiovascular device that does not compete with any current Abbott products is seeking an investor. Serena thinks it is a good opportunity and decides to pursue it.  That's not correct!  That's correct!  That's partially correct!  This is a potential conflict of interest because the business opportunity that Serena is interested in pursuing is a logical extension of Abbott’s current business. Before moving forward, Serena should check with her division leadership to see whether Abbott is interested in pursuing the opportunity.  Is this a potential conflict of interest?  [1] Yes  [2] No  Submit |  |
| [Screen 36](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=37_C_41)  [37\_C\_41](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=37_C_41) | Let’s now look at conflicts of interest involving outside employment and consulting. |  |
| [Screen 37](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=38_C_42)  [38\_C\_42](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=38_C_42) | Imagine...  Alex, a graphic designer, used to work for one of Abbott’s suppliers, but has recently been hired by Abbott.  Alex continues to do some design work for his old employer and doesn’t mention it to his manager.  CLICK THE BUTTON BELOW TO LEARN WHY THIS IS A CONFLICT OF INTEREST.  WHY IS THIS A CONFLICT?  Why is this a conflict?  This is a potential conflict of interest because it might be distracting Alex from his work at Abbott. In addition, Alex’s old employer might, at some point, take on design work for an Abbott competitor. |  |
| [Screen 38](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=39_C_43)  [39\_C\_43](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=39_C_43) | Abbott’s Concerns Relating to Outside Employment  Outside employment may:   * Interfere with or distract from Abbott work duties (this is especially true for employees in certain job functions) * Compromise Abbott confidential information if such information is shared with an outside employer * Lead to an additional conflict if an employee’s outside employer competes with Abbott, or works for a company that competes with Abbott, and * Cause the misuse of Abbott business materials and resources |  |
| [Screen 39](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=40_C_44)  [40\_C\_44](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=40_C_44) | Abbott’s Requirements  Abbott employees are expected to give Abbott their full time and attention during the times they are scheduled to work for Abbott.  Each outside employment or consulting opportunity should be viewed as a potential conflict of interest and should be discussed and assessed on a case-by-case basis with the employee’s manager. |  |
| [Screen 40](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=41_C_45)  Activity: Scenario  [41\_C\_45](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=41_C_45) | Imagine...  Juan, an Abbott clinical specialist, has a degree in philosophy and is interested in teaching philosophy at a local community college.  That's not correct!  That's correct!  That's partially correct!  While there is nothing wrong with Juan pursuing his outside interest in teaching, the fact that he is taking on outside employment could present a conflict of interest or could be perceived to be a conflict of interest.  As with any outside employment opportunity, Juan should assume that this is a potential conflict of interest and discuss the situation with his manager.  Is this a potential conflict of interest?  [1] Yes  [2] No  Submit |  |
| [Screen 41](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=42_C_46)  Activity: Scenario  [42\_C\_46](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=42_C_46) | What questions about Juan’s outside employment is his manager likely to ask?  That's not correct!  That's correct!  That's partially correct!  Juan’s manager will seek to confirm that Juan’s outside employment does NOT:   * Interfere with or distract from his Abbott work duties * Lead to the misuse of Abbott business materials and resources * Compromise Abbott confidential information   What question about Juan’s outside employment is his manager likely to ask?  [1] Will Juan’s activities negatively affect his ability to carry out his responsibilities for Abbott?  [2] Will Juan use Abbott materials or resources, for example, his laptop, for his outside employment?  [3] Will Juan disclose Abbott’s confidential information?  [4] All of the above.  Submit |  |
| [Screen 42](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=43_C_47)  [43\_C\_47](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=43_C_47) | Finally, let’s look at conflicts of interest involving serving on boards or as officers of various third parties. |  |
| [Screen 43](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=44_C_48)  [44\_C\_48](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=44_C_48) | Imagine...  Jayla, a procurement manager at Abbott, accepts a position on the board of directors of a local charitable foundation which purchases healthcare products from time to time.  The foundation is a non-profit organization.  CLICK THE BUTTON BELOW TO LEARN WHY THIS IS A CONFLICT OF INTEREST.  WHY IS THIS A CONFLICT?  Why is this a conflict?  Even though the foundation is a non-profit organization that does not compete with Abbott, there is a possibility that Abbott’s commercial interests – to make a profit – would conflict with those of the charitable organization, which is to buy products at the lowest price possible.  It would be difficult for Jayla to act in the best interests of both the foundation and Abbott. In addition, as a procurement manager, Jayla could use her knowledge of Abbott pricing strategies to assist the foundation in negotiating a lower price. |  |
| [Screen 44](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=45_C_49)  [45\_C\_49](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=45_C_49) | Abbott’s Concerns Relating to Employees Serving on Boards or as Officers of Third Parties  Abbott’s main concerns with employees serving on boards or as officers of third parties are that the employees:   * May not act in the best interest of Abbott * May be influenced to make decisions that are not in the best interest of Abbott * May unintentionally disclose Abbott’s confidential information   Employees who want to serve on boards or as officers of third parties should disclose that to their managers and seek the relevant approvals described later in this course. |  |
| [Screen 45](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=46_C_50)  [46\_C\_50](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=46_C_50) | Serving on boards or as officers of the following types of third parties should be considered carefully:   * Vendors * Suppliers * Other companies doing business with Abbott * Professional organizations (e.g., The European Society for Medical Oncology, American Nurses Association) * Trade organizations * Hospitals and other customers * Public or private bodies setting rules or standards applicable to Abbott’s business, for example, the World Health Organization (WHO)   It is never appropriate for an Abbott employee to serve as a board member or officer of an Abbott competitor. |  |
| [Screen 46](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=47_C_51)  Activity: Scenario  [47\_C\_51](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=47_C_51) | Imagine...  Maria, an Abbott marketing manager, has a teenage son who’s been recently diagnosed with diabetes. Because the topic of diabetes is near and dear to her heart, Maria wants to serve (in her personal capacity) on the board of directors of a diabetes foundation.  That's not correct!  That's correct!  That's partially correct!  As a member of the board, Maria is generally obligated to vote and act in the best interests of the organization and its constituents. However, because Abbott’s business involves products used to manage diabetes, there is a possibility that the interests of the foundation might conflict with Abbott’s interests.  Is this a potential conflict of interest?  [1] Yes  [2] No  Submit |  |
| [Screen 47](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=48_C_52)  [48\_C\_52](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=48_C_52) | Click the arrow to begin your review.  Review  Take a moment to review some of the key concepts in this section.  Financial Interests  Financial conflicts of interest exist when an Abbott employee has a material ownership or other financial interest in a business entity that conducts or seeks to conduct business with Abbott or is a competitor of Abbott.  Family Members  Conflicts involving family members occur when an Abbott employee conducts or seeks to conduct business on behalf of Abbott with a family member.  Gifts, Payments, and Other Inducements  Accepting gifts, payments, and other inducements from a supplier, vendor, or other business associate of Abbott creates a potential conflict of interest, as it might influence, or give the appearance of influencing, an employee’s purchasing decisions.  Corporate Opportunities  If an Abbott employee becomes aware of a business opportunity that is a logical extension of Abbott’s current business, or would be in competition with Abbott’s business, the employee must offer the opportunity to Abbott.  Outside Employment and Consulting  All outside employment (including consulting opportunities) should be viewed as a potential conflict of interest and should be discussed and assessed on a case-by-case basis with the employee’s manager.  Serving on Boards or as Officers for Third Parties  Employees who want to serve on boards or as officers of third parties should disclose that to their managers and seek the relevant approvals.  To check your progress, click the Menu button  You have completed section 2 of 4  Click the forward arrow to continue learning |  |
| [Screen 48](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=49_C_53)  Activity: Dialogue  [49\_C\_53](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=49_C_53) | When disclosing a conflict of interest, follow these simple steps. |  |
| [Screen 48](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=50_C_53)  [50\_C\_53](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=50_C_53) | Step 1: Talk to your manager.  Discuss the circumstances with your manager to determine whether you have an actual or potential conflict of interest.  If no conflict exists, you may proceed with the desired activity.  If a conflict exists, you should proceed to Step 2. |  |
| [Screen 48](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=51_C_53)  [51\_C\_53](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=51_C_53) | Step 2: Consider possible actions to minimize or eliminate the conflict.  If a conflict exists, you and your manager should take the time to consider possible actions that you can take to minimize or eliminate the conflict.  If the conflict cannot be minimized or eliminated, your manager will instruct you NOT TO PROCEED with the proposed activity.  If the conflict can be minimized or eliminated, proceed to Step 3. |  |
| [Screen 48](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=52_C_53)  [52\_C\_53](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=52_C_53) | Step 3: Document your proposed actions to minimize or eliminate the conflict.  If steps can be taken to minimize or eliminate the conflict of interest, you should document these actions in an Actual or Potential Conflict of Interest Approval Form. Once completed, the form must be approved and submitted via the Speak Up Helpline (speakup.abbott.com). |  |
| [Screen 48](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=53_C_53)  [53\_C\_53](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=53_C_53) | To submit a conflict of interest disclosure:   * Access the speakup.abbott.com site. * Click the Conflict of Interest button. * Fill out and submit the Conflict of Interest disclosure. * Click the Attach Manager’s Approval button and attach the scanned Actual or Potential Conflict of Interest Approval Form.   Once approved, you may proceed with the desired activity. |  |
| [Screen 49](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=54_C_56)  [54\_C\_56](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=54_C_56) | If you become aware of an actual or potential conflict of interest involving another employee or employees, you should report the conflict to your manager, the OEC, HR, Legal, or through the Speak Up Helpline (speakup.abbott.com). |  |
| [Screen 50](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=55_C_57)  [55\_C\_57](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=55_C_57) | To report other employees’ actual or potential conflict of interest via the Speak Up Helpline, simply click the Raise a Concern button on the Speak Up Helpline and follow the onscreen instructions. |  |
| [Screen 51](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=56_C_58)  [56\_C\_58](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=56_C_58) | In addition to the processes we have just covered, you can also use the annual Conflicts of Interest Certification assigned via LERN to both disclose your own conflicts and to report conflicts of others.  The Conflicts of Interest Certification is designed to identify conflicts not previously approved by management and reported to the OEC. |  |
| [Screen 52](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=57_C_60)  [57\_C\_60](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=57_C_60) | If you have an actual or potential conflict of interest, or if you are unsure, or have questions about conflicts of interest, always speak to your manager.  Your manager knows you and your work environment and is closest to the issue. The OEC, HR, and Legal are also resources that can help you analyze the situation and brainstorm alternatives.  Open and honest communication with your manager will help you avoid conflicts of interest and can protect you and Abbott from serious negative consequences. |  |
| [Screen 53](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=58_C_61)  [58\_C\_61](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=58_C_61) | Click the arrow to begin your review.  Review  Take a moment to review some of the key concepts in this section.  Self-disclosing a Conflict: Step 1  Talk to your manager to determine whether you have an actual or potential conflict of interest. If no conflict exists, you may proceed with the desired activity.  Self-disclosing a Conflict: Step 2  If a conflict exists, you and your manager should take the time to consider possible actions that you can take to minimize or eliminate the conflict. If the conflict cannot be minimized or eliminated, DO NOT PROCEED with the proposed activity.  Self-disclosing a Conflict: Step 3  If steps can be taken to minimize or eliminate the conflict of interest, you should document these actions in an Actual or Potential Conflict of Interest Approval Form and submit it via the Speak Up Helpline.  Reporting Conflicts Involving Others  If you become aware of an actual or potential conflict of interest involving another employee or employees, you should report the conflict to your manager, the OEC, HR, Legal, or through the Speak Up Helpline (speakup.abbott.com).  Annual Conflicts of Interest Certification  You can also use the annual Conflicts of Interest Certification to both disclose your own conflicts and to report conflicts of others.  Where to Go for Help and Support  If you have an actual or potential conflict of interest, or if you are unsure, or have questions about conflicts of interest, speak to your manager, the OEC, HR, or Legal.  To check your progress, click the Menu button  You have completed section 3 of 4  Click the forward arrow to continue learning |  |
| [Screen 54](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=59_C_62)  [59\_C\_62](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=59_C_62) | Where to Get Help  MANAGER OR SUPERVISOR  If you have an actual or potential conflict of interest, or if you learn of a conflict of interest involving other employees, or if you have general questions about conflicts of interest, always speak to your manager. Your manager knows you and your work environment and should be able to help you address the situation appropriately. You can also talk to your manager if you have questions on how this course applies to your specific job responsibilities.  WRITTEN STANDARDS   * Review Abbott’s [Code of Business Conduct](http://www.abbott.com/investors/governance/code-of-business-conduct.html) for guidance on avoiding conflicts of interest. * Consult the Guidelines for Review and Approval of Conflicts of Interest for guidance in identifying and handling actual and potential conflicts of interest.   + Click [here](https://abbott.sharepoint.com/sites/abbottworld/EthicsCompliance/Pages/Guidelines-for-COI.aspx) to access the Guidelines on the OEC website on Abbott World. * Refer to the Global Purchasing policy Purchasing Code of Conduct for Interacting with Suppliers (CPP 40) for requirements on interactions with suppliers, vendors, or other business associates of Abbott.   + Click [here](http://abbottmfiles.oneabbott.com/Default.aspx?#3E4088E6-D40A-4DA2-90B9-76B55D51A390/object/3EFDC018-5AB5-4FF7-A451-1F6544869799/latest) to access CPP 40 on Abbott World. * Refer to Abbott’s Ethics and Compliance Global Policy on Business Standards, as well as any affiliate or business policies and procedures for guidance on how to avoid conflicts of interests when interacting with Health Care Professionals (HCPs), Health Care Institutions (HCIs), Government Officials, Retailers, Distributors, Patients, and Consumers.   + Click [here](http://abbottmfiles.oneabbott.com/#3E4088E6-D40A-4DA2-90B9-76B55D51A390/views/V146/V240/V241) to access the Global Business Standards page on the OEC website on Abbott World.   OFFICE OF ETHICS AND COMPLIANCE (OEC)   * The OEC is a corporate resource available to address your questions or concerns about conflicts of interest.   + Visit [iComply](https://icomply.abbott.com/Apps/ComplianceContacts/) Compliance Contacts page on the [OEC website](https://abbott.sharepoint.com/sites/abbottworld/EthicsCompliance) on Abbott World. * Visit our multilingual ethics and compliance [Speak Up Helpline](http://speakup.abbott.com/) available globally 24/7 to disclose your own conflicts of interest, report conflicts of interest regarding other employees, or voice your concerns about a potential violation of our company’s values and standards of conduct.   Legal Division  Contact the Legal Division with questions or concerns about legal implications of conflicts of interest.   * Click [here](https://abbott.sharepoint.com/sites/abbottworld/Legal) to access the Legal home page on Abbott World.   Course Resources  TRANSCRIPT  Click [here](http://dummy.com/reference/Transcript.pdf) for a full transcript of the course. |  |
| [Screen 55](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=60_C_64)  [60\_C\_64](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=60_C_64) | The Knowledge Check that follows 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 56](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=61_C_65)  [61\_C\_65](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=61_C_65) | [1] Which one of the following statements accurately defines a conflict of interest?  [1] A conflict of interest exists whenever an Abbott employee has private interests in addition to his or her Abbott interests.  [2] A conflict of interest exists whenever an Abbott employee benefits from his or her position at Abbott.  [3] A conflict of interest exists whenever an Abbott employee’s private interests interfere, or appear to interfere, with Abbott’s interests.  Next  A conflict of interest exists whenever an Abbott employee’s private interests interfere, or appear to interfere, with Abbott’s interests. In other words, a conflict of interest exists when an individual can personally benefit from his or her position as an employee or when an individual’s personal investments, interests, or associations can interfere with Abbott’s interests.  [2] Having a conflict of interest automatically prohibits you from pursuing the desired activity.  [1] True  [2] False  Next  Having a conflict of interest does not automatically prohibit you from pursuing the desired activity. Oftentimes, conflicts of interest can be resolved by taking certain actions to minimize or eliminate the conflict and avoid any impact to Abbott’s business.  [3] You are a Facilities Manager at Abbott. You want to invest in a small construction company that frequently submits bids on building and paving projects at an Abbott facility that you manage. What type of conflict of interest is this?  [1] Financial conflict  [2] Conflict involving a family member  [3] Conflict involving gifts, payments, and other inducements  [4] Conflict involving a corporate opportunity  [5] Conflict involving outside employment and consulting  [6] Conflict involving serving on a board or as an officer of a third party  Next  This situation is a potential financial conflict of interest. Financial conflicts of interest exist when an Abbott employee has a material (significant) investment, ownership interest, or other financial interest in a business entity that conducts or seeks to conduct business with Abbott or is a competitor of Abbott.  [4] You are an Abbott event planner and are looking for a new vendor to cater Abbott events. Your sister has recently started a small catering company. She offers the same service as your existing vendor but at a 25% discount. Can you hire your sister’s company?  [1] No. Hiring your sister’s company would create a conflict of interest involving a family member. These types of conflicts cannot be resolved.  [2] No. However, someone else in your group who does not directly or indirectly report to you can hire your sister, as long as she is the best vendor for the job, and you disclose the conflict of interest and exclude yourself from any dealings with her company on Abbott’s behalf.  [3] Yes. Hiring your sister’s company would create a conflict of interest involving a family member. However, these types of conflicts can be resolved by simply disclosing the situation to your manager.  [4] Yes. It is in Abbott’s best interest to hire a company offering a 25% discount.  Next  This situation is a potential conflict of interest involving a family member. In this situation, you cannot personally hire your sister’s company. However, someone else in your group can hire her, as long as she is determined to be the best vendor for the job, and you disclose the conflict of interest and exclude yourself from any dealings with her company on Abbott’s behalf. It is in Abbott’s best interest to hire the best company available at the best price possible.  [5] You are a procurement manager at Abbott. You have worked with a supplier for years. To show goodwill, the supplier invites your entire team to their annual holiday dinner party at a local five-star resort. Is this a potential conflict of interest?  [1] No. Acts of goodwill are not considered conflicts of interest.  [2] No. This situation is not a conflict of interest, because the invitation is to all members of your team and is not tied to a particular purchasing decision.  [3] Yes. Accepting gifts, payments, and other inducements from a supplier creates a potential conflict of interest.  [4] Yes. Abbott employees are not allowed to attend supplier-sponsored events for any purpose.  Next  Accepting gifts, payments, and other inducements from a supplier, vendor, or other business associate of Abbott creates a potential conflict of interest, as it might influence or give the appearance of influencing an employee’s purchasing decisions. It may also create a perception of inappropriate behavior. You should discuss the situation with your manager.  [6] You are a territory manager within Abbott Nutrition. You have recently learned of an opportunity to make a sizable investment in a company that would make a plant-based nutritional drink that Abbott does not produce. If you pursue this opportunity, would there be a conflict of interest?  [1] No. There would not be a conflict of interest because Abbott has never been interested in pursuing plant-based nutritional drinks and is not actively pursuing the opportunity.  [2] Yes. There would be a conflict of interest because it is an opportunity that might be a logical extension of Abbott’s current business.  Next  This situation is a potential conflict of interest, because it is an opportunity that might be a logical extension of Abbott’s current business. Thus, you are obligated to offer this opportunity to Abbott before acting on it personally. You should disclose it to the head of your business division. If, after analysis by the company, Abbott decides not to pursue the opportunity, you may do so in your personal capacity, as long as it does not create another type of conflict, such as owning a business in competition with Abbott.  [7] Before you began working at Abbott, you worked as a Project Manager for an Abbott supplier. Both HR and your current manager knew this when you were first hired. Your old company is now asking you to do some consulting work for them, and you would like to accept the offer. Do you need to disclose this side job to your manager?  [1] No, you are not required to disclose any consulting opportunities that do not interfere with or distract from your Abbott work duties.  [2] Yes. Each outside employment or consulting opportunity should be viewed as a potential conflict of interest and should be discussed with your manager.  Next  Outside employment may:   * Interfere with or distract from Abbott work duties; * Compromise Abbott confidential information if shared with an outside employer; * Lead to an additional conflict if an employee’s outside employer decides to pursue a business that competes with Abbott; and * Cause the misuse of Abbott business materials and resources.   Therefore, as with any potential employment or consulting opportunity, you should assume that it is a potential conflict of interest and discuss the situation with your manager.  [8] You are a director of product development in the Structural Heart division at Abbott. You have recently been offered a seat on the board of directors of the not-for-profit American Heart Association. Is this a potential conflict of interest?  [1] It depends on whether you are being asked to serve on the board as a representative of Abbott or in your personal capacity.  [2] No, there is no conflict of interest since the seat is on the board of a not-for-profit organization.  [3] Yes. Serving on the board of an association relevant to Abbott’s business in any capacity is a potential conflict of interest.  Next  Abbott’s main concerns with employees serving on boards or as officers of third parties are that the employees:   * May be required to act on behalf of an organization whose interests are not necessarily aligned with Abbott’s interests and * May misuse or disclose Abbott’s confidential information.   Before accepting any board membership, it is important to talk to your manager.  [9] Who can you talk to if you have an actual or potential conflict of interest, or if you are unsure of whether you have a conflict, or if you have questions about conflicts?  Check all that apply.  [1] Your manager  [2] OEC  [3] Legal  [4] HR  Next  If you have an actual or potential conflict of interest, or if you are unsure of whether you have a conflict, or if you have questions about conflicts, always speak to your manager. The OEC, HR, and Legal are also resources that can help you analyze the situation and brainstorm alternatives.  10  All Abbott employees are required to complete the Conflicts of Interest Certification every year.  [1] True  [2] False  Submit  All Abbott employees are required to complete the Conflicts of Interest Certification every year. The Conflicts of Interest Certification is designed to identify conflicts NOT previously disclosed. If the conflict has already been disclosed or reported, you should not disclose or report it again using the Conflicts of Interest Certification (or any other means) unless the circumstances have changed since your initial disclosure or report. |  |
| [Screen 57](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=62_C_66)  [62\_C\_66](http://www.learnex.co.uk/test/AbbottEnterpriseCyber/courses/EN-US/course/index.html?showScreen=62_C_66) | No results are available as you have not completed the Knowledge Check.  Congratulations! You have successfully passed the Knowledge Check and completed the course.  Please review your results below by clicking on each question.  Once you are done, you must click the EXIT[X] button in the course title bar before closing your browser window or browser tab.  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 button. |  |
| 63\_toc\_1 | Introduction |  |
| 64\_toc\_2 | Welcome |  |
| 65\_toc\_3 | Objectives |  |
| 66\_toc\_4 | Menu |  |
| 67\_toc\_5 | The Impact of Conflicts of Interest |  |
| 68\_toc\_6 | Conflicts of Interest Defined |  |
| 69\_toc\_7 | Why Avoiding Conflicts of Interest Matters |  |
| 70\_toc\_8 | Review |  |
| 71\_toc\_9 | Types of Conflicts of Interest |  |
| 72\_toc\_10 | Financial Interests |  |
| 73\_toc\_11 | Family Members |  |
| 74\_toc\_12 | Gifts, Payments, and Other Inducements |  |
| 75\_toc\_13 | Corporate Opportunities |  |
| 76\_toc\_14 | Outside Employment and Consulting |  |
| 77\_toc\_15 | Serving on Boards or as Officers for Third Parties |  |
| 78\_toc\_16 | Review |  |
| 79\_toc\_17 | Disclosing and Reporting Conflicts of Interest |  |
| 80\_toc\_18 | Disclosing Your Own Conflict of Interest |  |
| 81\_toc\_19 | Reporting Someone Else’s Conflict of Interest |  |
| 82\_toc\_20 | Annual Conflicts of Interest Certification |  |
| 83\_toc\_21 | Where to Go for Help and Support |  |
| 84\_toc\_22 | Review |  |
| 85\_toc\_23 | Knowledge Check |  |
| 86\_toc\_24 | Introduction |  |
| 87\_toc\_25 | Knowledge Check |  |
| 88\_toc\_26 | Assessment |  |
| 89\_toc\_27 | Feedback |  |
| 90\_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 |  |
| 91\_string\_2 | All questions remain unanswered |  |
| 92\_string\_3 | Questions |  |
| 93\_string\_4 | Question |  |
| 94\_string\_5 | not answered |  |
| 95\_string\_6 | That's correct! |  |
| 96\_string\_7 | That's not correct! |  |
| 97\_string\_8 | Feedback: |  |
| 98\_string\_9 | Conflicts of Interest |  |
| 99\_string\_10 | Knowledge Check |  |
| 100\_string\_11 | Submit |  |
| 101\_string\_12 | Retake |  |
| 102\_string\_13 | COURSE DESCRIPTION: Conflicts of interest can result in negative publicity, damage a company’s reputation, lower employee morale, and have a negative impact on the company’s performance. In this course, you will learn how to recognize, disclose, and report conflicts of interest to protect yourself and Abbott from serious unintended consequences. |  |
| 103\_string\_14 | Table of Contents |  |
| 104\_string\_15 | Where to Get Help |  |
| 105\_string\_16 | Reference Material |  |
| 106\_string\_17 | Audio |  |
| 107\_string\_18 | Exit |  |