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| --- | --- | --- |
| ID | Source | Target |
| ID 1 | Conflicts of Interest |  |
| ID 2 | Click the forward arrow to begin. |  |
| ID 3 | MENU |  |
| ID 4 | The Impact of Conflicts of Interest |  |
| ID 5 | Here you will learn what a conflict of interest is and why avoiding conflicts of interest matter. |  |
| ID 6 | 3 minutes |  |
| ID 7 | Conflicts of Interest Defined |  |
| ID 8 | Why Avoiding Conflicts of Interest Matters |  |
| ID 9 | Review |  |
| ID 10 | Types of Conflicts of Interest |  |
| ID 11 | Here you will learn how to recognize and resolve different types of conflicts of interest. |  |
| ID 12 | 12 minutes |  |
| ID 13 | Financial Interests |  |
| ID 14 | Family Members |  |
| ID 15 | Gifts, Payments, and Other Inducements |  |
| ID 16 | Corporate Opportunities |  |
| ID 17 | Outside Employment and Consulting |  |
| ID 18 | Serving on Boards or as Officers for Third Parties |  |
| ID 19 | Review |  |
| ID 20 | Disclosing and Reporting Conflicts of Interest |  |
| ID 21 | Here you will learn how to disclose and report conflicts of interest. |  |
| ID 22 | 6 minutes |  |
| ID 23 | Disclosing Your Own Conflict of Interest |  |
| ID 24 | Reporting Someone Else’s Conflict of Interest |  |
| ID 25 | Annual Conflicts of Interest Certification |  |
| ID 26 | Where to Go for Help and Support |  |
| ID 27 | Review |  |
| ID 28 | Knowledge Check |  |
| ID 29 | Assess your understanding of the key concepts and principles of this course. |  |
| ID 30 | 5 minutes |  |
| ID 31 | Assessment |  |
| ID 32 | INSTRUCTION TEXT: |  |
| ID 33 | Click the panel to get started. |  |
| ID 34 | Click the yellow play button to begin. |  |
| ID 35 | Here is an example. |  |
| ID 36 | A plant supervisor decides to hire his brother’s company to provide security arrangements at an Abbott facility. |  |
| ID 37 | 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. |  |
| ID 38 | His personal interest could conflict with Abbott’s interest, which is to hire the best security company available, at the lowest possible price. |  |
| ID 39 | As a result, there is a conflict of interest. |  |
| ID 40 | TO LEARN MORE ABOUT THE EFFECT CONFLICTS OF INTEREST CAN HAVE ON ABBOTT’S STAKEHOLDERS, CLICK THE DOWN ARROW. |  |
| ID 41 | Employees |  |
| ID 42 | 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. |  |
| ID 43 | Click the down arrow. |  |
| ID 44 | REVIEW |  |
| ID 45 | CONFLICTS OF INTEREST DEFINED |  |
| ID 46 | A conflict of interest exists whenever an Abbott employee’s private interests interfere, or appear to interfere, with Abbott’s interests. |  |
| ID 47 | WHY AVOIDING CONFLICTS OF INTEREST MATTERS |  |
| ID 48 | 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. |  |
| ID 49 | THE KEY TO RESOLVING CONFLICTS OF INTERESTS |  |
| ID 50 | The key to resolving conflicts is to openly communicate the conflict to your manager, so the circumstances can be assessed and addressed appropriately. |  |
| ID 51 | You have completed section {a} of {b} |  |
| ID 52 | Click the arrow to begin your review. |  |
| ID 53 | To check your progress, click the Menu button. |  |
| ID 54 | Conflicts of interest generally fall into six broad categories. Let’s begin by looking at an example of a financial conflict of interest. |  |
| ID 55 | Let’s now consider conflicts of interest involving family members. |  |
| ID 56 | Therefore, individual Abbott employees must not do business on behalf of Abbott with family members or companies owned directly or indirectly by family members. |  |
| ID 57 | 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. |  |
| ID 58 | Did Sanjeet handle the distributor selection process appropriately? |  |
| ID 59 | 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. |  |
| ID 60 | Sanjeet should exclude his friend from the vetting process. |  |
| ID 61 | 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. |  |
| ID 62 | 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. |  |
| ID 63 | 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. |  |
| ID 64 | The tickets are for the luxury seating, which does not meet the requirement that events must be non-lavish, and |  |
| ID 65 | 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. |  |
| ID 66 | 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. |  |
| ID 67 | 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. |  |
| ID 68 | 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. |  |
| ID 69 | As with any outside employment opportunity, Juan should assume that this is a potential conflict of interest and discuss the situation with his manager. |  |
| ID 70 | Vendors |  |
| ID 71 | Suppliers |  |
| ID 72 | Other companies doing business with Abbott |  |
| ID 73 | Professional organizations (e.g., The European Society for Medical Oncology, American Nurses Association) |  |
| ID 74 | Trade organizations |  |
| ID 75 | Hospitals and other customers |  |
| ID 76 | Public or private bodies setting rules or standards applicable to Abbott’s business, for example, the World Health Organization (WHO) |  |
| ID 77 | REVIEW |  |
| ID 78 | FINANCIAL INTERESTS |  |
| ID 79 | 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. |  |
| ID 80 | FAMILY MEMBERS |  |
| ID 81 | Conflicts involving family members occur when an Abbott employee conducts or seeks to conduct business on behalf of Abbott with a family member. |  |
| ID 82 | GIFTS, PAYMENTS, AND OTHER INDUCEMENTS |  |
| ID 83 | 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. |  |
| ID 84 | CORPORATE OPPORTUNITIES |  |
| ID 85 | 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. |  |
| ID 86 | OUTSIDE EMPLOYMENT AND CONSULTING |  |
| ID 87 | 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. |  |
| ID 88 | OUTSIDE EMPLOYMENT AND CONSULTING |  |
| ID 89 | 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. |  |
| ID 90 | SERVING ON BOARDS OR AS OFFICERS FOR THIRD PARTIES |  |
| ID 91 | Employees who want to serve on boards or as officers of third parties should disclose that to their managers and seek the relevant approvals. |  |
| ID 92 | You have completed section {a} of {b} |  |
| ID 93 | CLICK THE FORWARD ARROW TO CONTINUE LEARNING |  |
| ID 94 | When disclosing a conflict of interest, follow these simple steps. |  |
| ID 95 | STEP 1 |  |
| ID 96 | Talk to your manager. |  |
| ID 97 | Discuss the circumstances with your manager to determine whether you have an actual or potential conflict of interest. |  |
| ID 98 | If no conflict exists, you may proceed with the desired activity. |  |
| ID 99 | If a conflict exists, you should proceed to Step 2. |  |
| ID 100 | STEP 2 |  |
| ID 101 | Consider possible actions to minimize or eliminate the conflict. |  |
| ID 102 | 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. |  |
| ID 103 | If the conflict cannot be minimized or eliminated, your manager will instruct you NOT TO PROCEED with the proposed activity. |  |
| ID 104 | If a conflict can be minimized or eliminated, you should proceed to Step 3. |  |
| ID 105 | STEP 3 |  |
| ID 106 | Document your proposed actions to minimize or eliminate the conflict. |  |
| ID 107 | 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). |  |
| ID 108 | To submit a conflict of interest disclosure: |  |
| ID 109 | Access the speakup.abbott.com site. |  |
| ID 110 | Click the Conflict of Interest button. |  |
| ID 111 | Fill out and submit the Conflict of Interest disclosure. |  |
| ID 112 | Click the Attach Manager’s Approval button and attach the scanned Actual or Potential Conflict of Interest Approval Form. |  |
| ID 113 | Once approved, you may proceed with the desired activity. |  |
| ID 114 | To report another employee’s actual or potential conflict of interest via the Speak Up Helpline, |  |
| ID 115 | simply click the Raise a Concern button on the Speak Up Helpline and follow the onscreen instructions. |  |
| ID 116 | The Conflicts of Interest Certification is designed to identify conflicts not previously approved by management and reported to the OEC. |  |
| ID 117 | REVIEW |  |
| ID 118 | SELF-DISCLOSING A CONFLICT: STEP 1 |  |
| ID 119 | 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. |  |
| ID 120 | SELF-DISCLOSING A CONFLICT: STEP 2 |  |
| ID 121 | 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. |  |
| ID 122 | SELF-DISCLOSING A CONFLICT: STEP 3 |  |
| ID 123 | 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. |  |
| ID 124 | REPORTING CONFLICTS INVOLVING OTHERS |  |
| ID 125 | 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). |  |
| ID 126 | ANNUAL CONFLICTS OF INTEREST CERTIFICATION |  |
| ID 127 | You can also use the annual Conflicts of Interest Certification to both disclose your own conflicts and to report conflicts of others. |  |
| ID 128 | WHERE TO GO FOR HELP AND SUPPORT |  |
| ID 129 | 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. |  |
| ID 130 | You have completed section {a} of {b} |  |
| ID 131 | CLICK THE FORWARD ARROW TO CONTINUE LEARNING |  |
| ID 132 | WHERE TO GET HELP |  |
| ID 133 | Visit iComply Compliance Contacts page on the [OEC website on Abbott World](https://abbott.sharepoint.com/sites/abbottworld/EthicsCompliance). |  |
| ID 134 | REFERENCE MATERIAL |  |
| ID 135 | Course Transcript |  |
| ID 136 | Click [here](https://dummy.com) for a full transcript of the course. |  |
| ID 137 | The Knowledge Check that follows consists of 10 questions. You must score 80% or higher to successfully complete this course. |  |
| ID 138 | When you are ready, click the Knowledge Check button. |  |
| ID 139 | Having a conflict of interest automatically prohibits you from pursuing the desired activity. |  |
| ID 140 | 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. |  |
| ID 141 | 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. |  |
| ID 142 | Yes. Accepting gifts, payments, and other inducements from a supplier creates a potential conflict of interest. |  |
| ID 143 | Yes. Abbott employees are not allowed to attend supplier-sponsored events for any purpose. |  |
| ID 144 | 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. |  |
| ID 145 | 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. |  |
| ID 146 | Sorry, you did not pass the Knowledge Check. Take a few minutes to review your results below by clicking on each question. |  |
| ID 147 | When you are done, click the Retake button. |  |
| ID 148 | Please retake the questions indicated. |  |