



INTRODUCTION

Welcome



This course has been designed to play both in *Audio On* and *Audio Off* modes.

If you are in a low bandwidth region, we recommend that you select the Audio Off mode now. To select this option, click the Audio icon in the title bar.

PLEASE CLICK THE FORWARD ARROW TO BEGIN.



INTRODUCTION

Welcome



As Abbott employees, we are responsible for the decisions we make and the actions we take every day.

To help us make the right decisions, we have an established decision-making process grounded in the principles of honesty, fairness and integrity. The aim is to provide you with a systematic way of assessing your options, evaluating their impact, and ultimately making the right choices for you, Abbott and its many stakeholders.



INTRODUCTION

Objectives



Upon completion of this course, you will be able to:

- Explain the importance of a systematic approach to decision making;
- Assess whether a course of action is legal, compliant and in keeping with Abbott values;
- Evaluate the impact a course of action has on key stakeholders;
- Balance the interests of patients, consumers, Abbott and others; and
- Know where to turn for help and support.

The course will take 20-25 minutes to complete.





INTRODUCTION

Tutorial



The icons at the top of the screen provide one-click access to key resources:

- The Table of Contents,
- Important contact information, and
- Reference material.

In addition, you can use the Audio icon to turn the audio on or off and the Exit icon to close the course window.



INTRODUCTION

Tutorial



There are several features to help guide you through the course:

- The Back and Forward arrows allow you to move from screen to screen.
- A horizontal slider bar at the bottom of the screen allows you to see where you are in the course.
- The Table of Contents lets you navigate from section to section.



INTRODUCTION

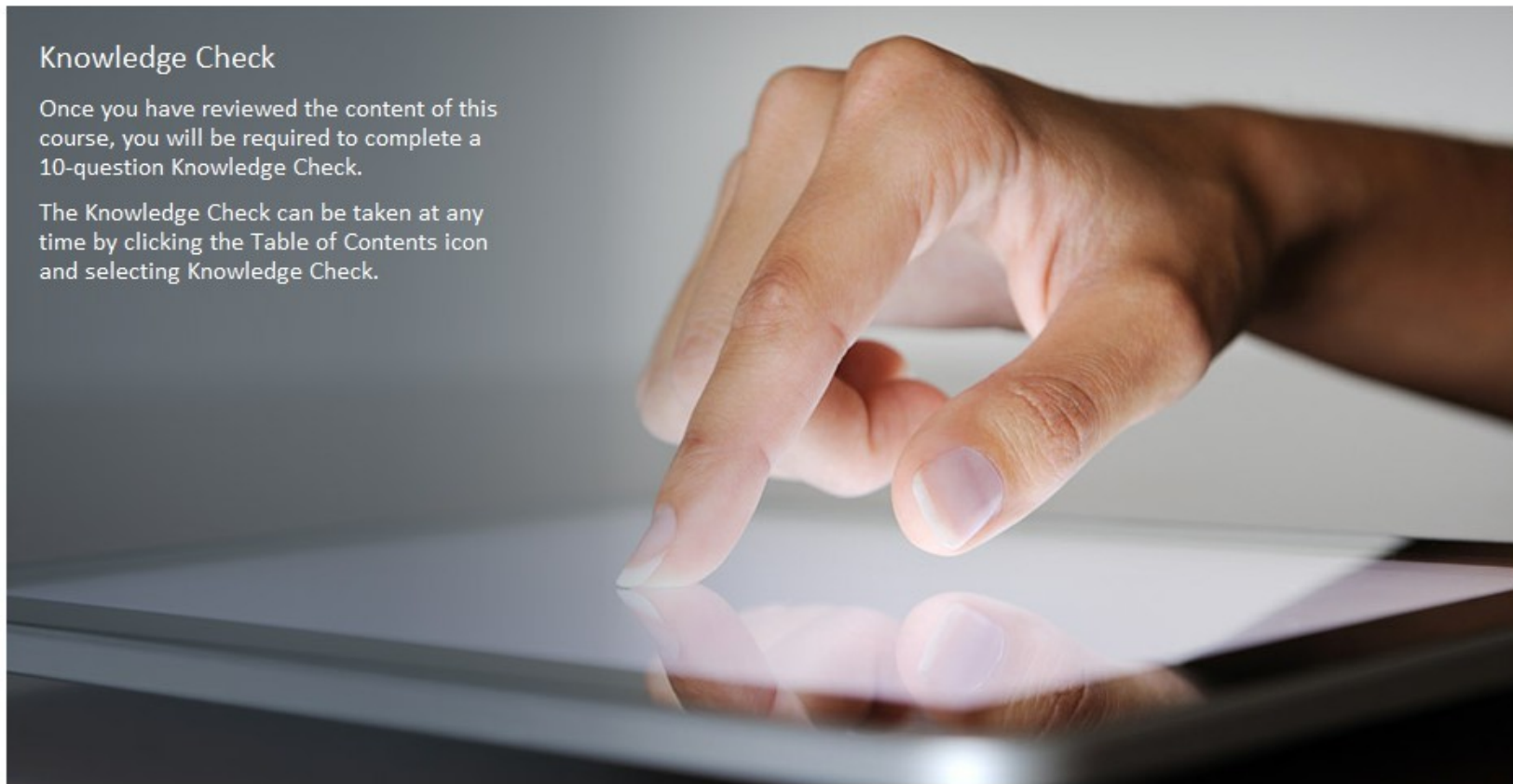
Tutorial



Knowledge Check

Once you have reviewed the content of this course, you will be required to complete a 10-question Knowledge Check.

The Knowledge Check can be taken at any time by clicking the Table of Contents icon and selecting Knowledge Check.





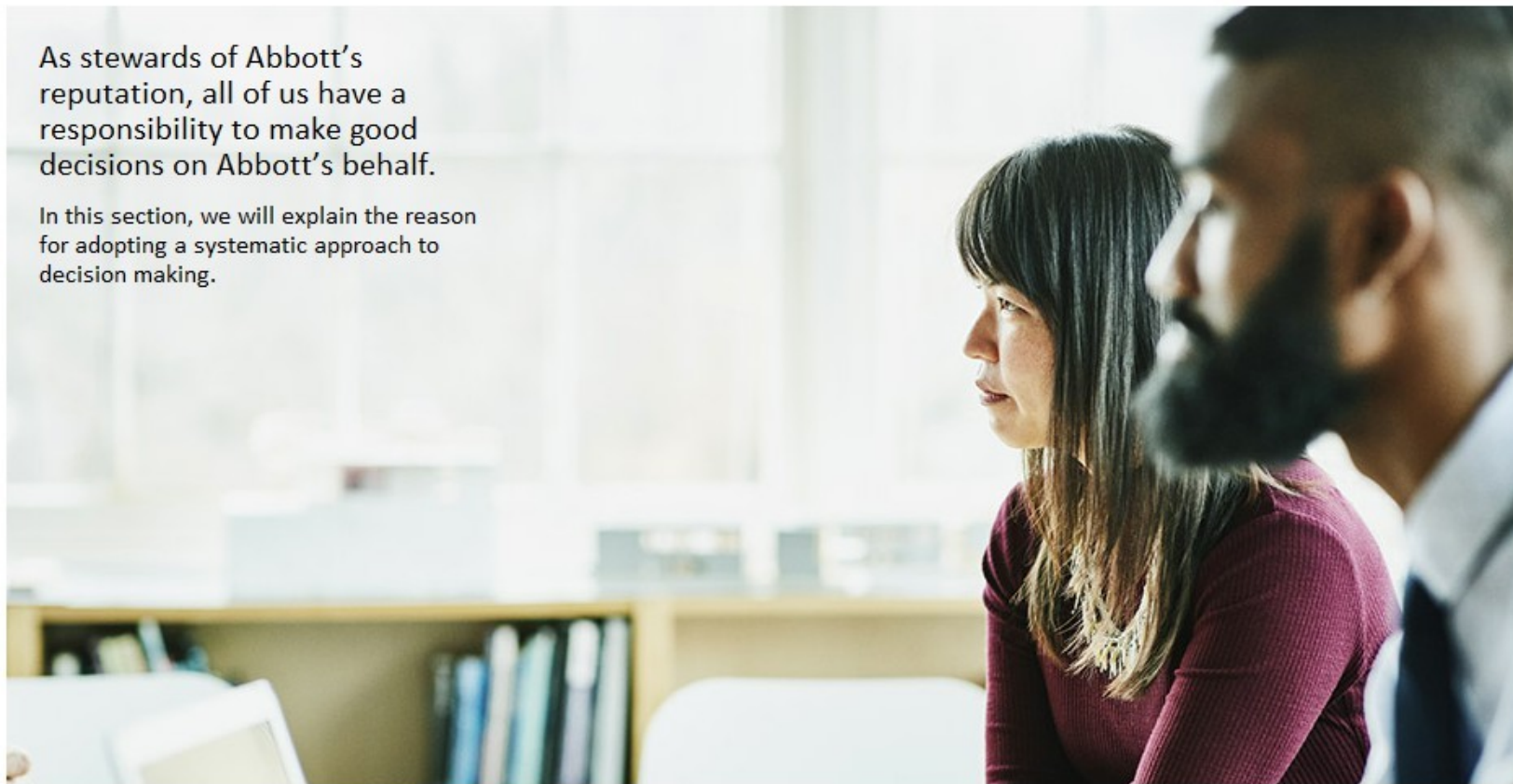
THE DECISION-MAKING PROCESS

Overview



As stewards of Abbott's reputation, all of us have a responsibility to make good decisions on Abbott's behalf.

In this section, we will explain the reason for adopting a systematic approach to decision making.



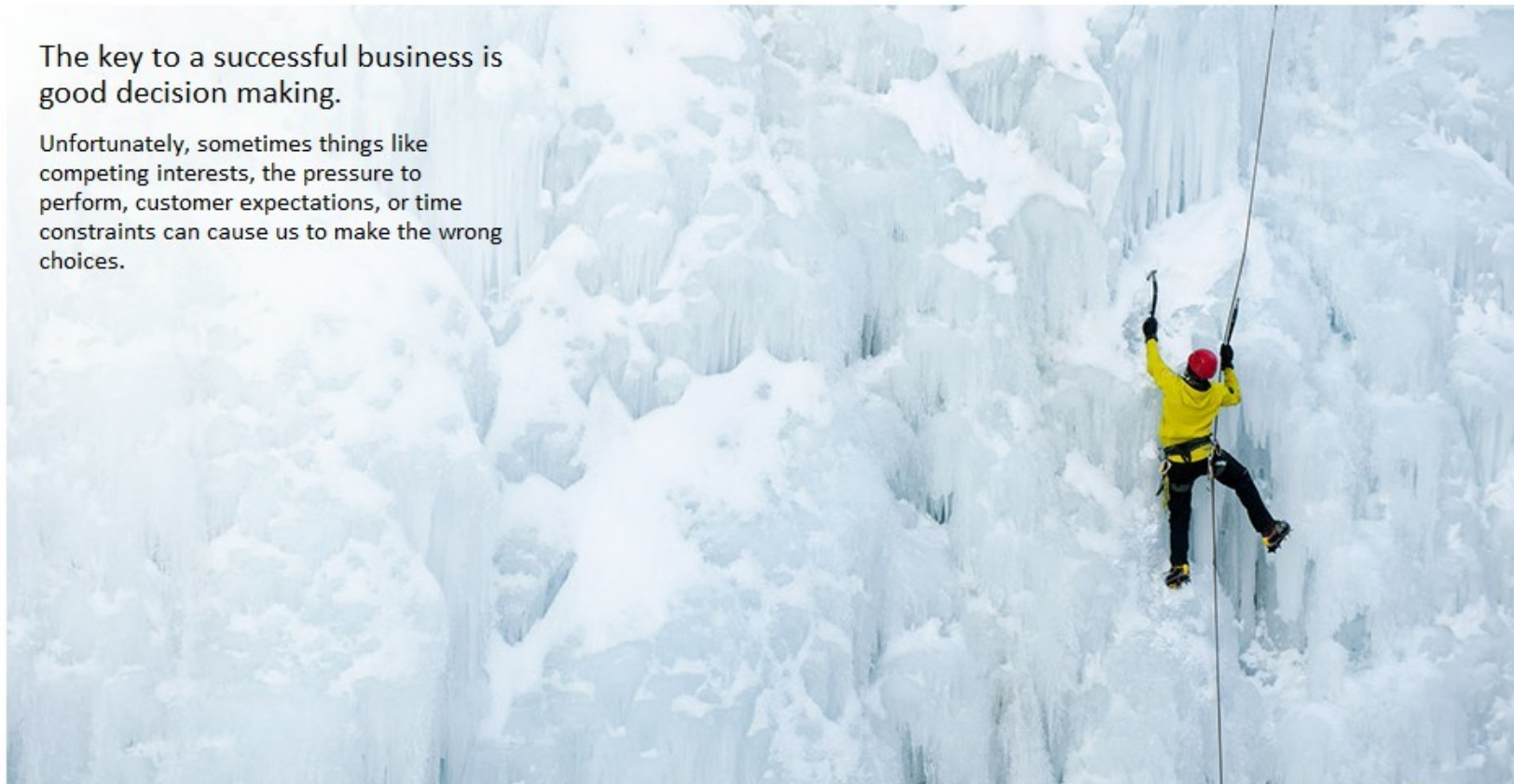
THE DECISION-MAKING PROCESS

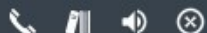
Understanding the Process



The key to a successful business is good decision making.

Unfortunately, sometimes things like competing interests, the pressure to perform, customer expectations, or time constraints can cause us to make the wrong choices.





THE DECISION-MAKING PROCESS

Understanding the Process



In most cases, people don't deliberately set out to make bad decisions.

Bad decisions are simply the result of poor decision making.



THE DECISION-MAKING PROCESS

Understanding the Process



Sometimes people mistakenly assume that good decision making is simply a matter of wanting to do the right thing.

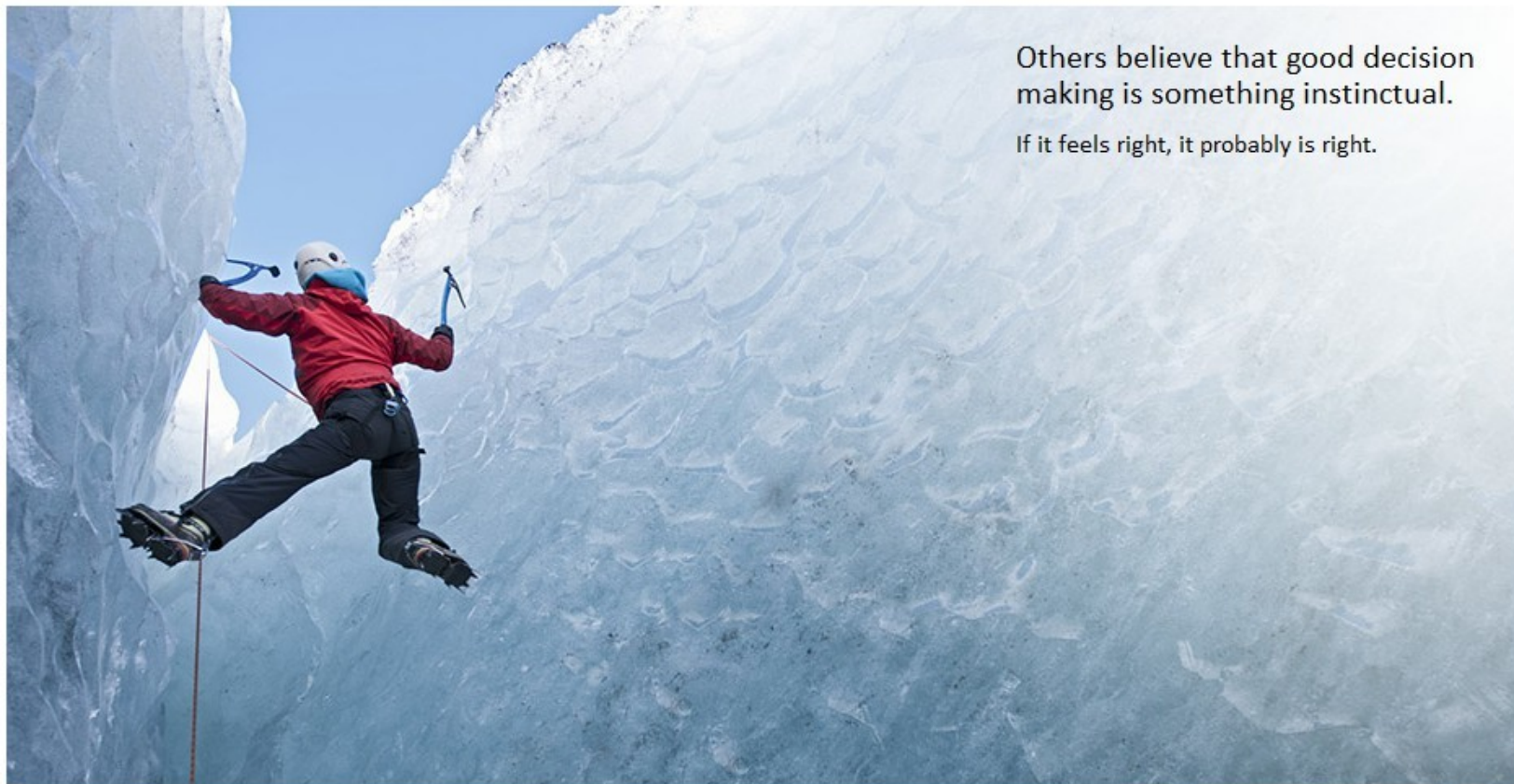
They believe that if their intentions are good, they can't help but choose the right course of action.





THE DECISION-MAKING PROCESS

Understanding the Process



Others believe that good decision making is something instinctual.

If it feels right, it probably is right.



THE DECISION-MAKING PROCESS

Understanding the Process

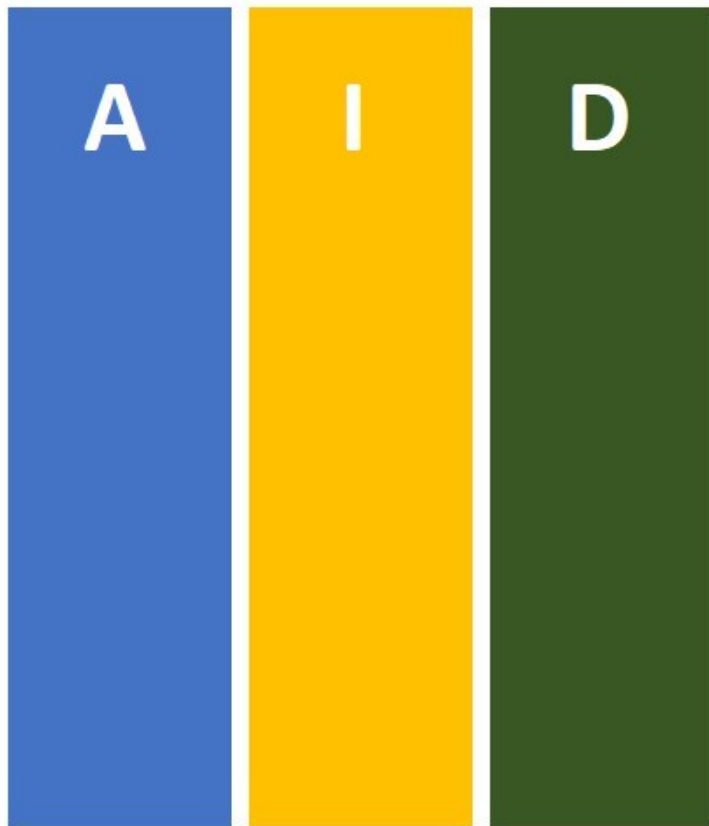


But good decision making is deliberative.

It requires careful assessment of the facts and follows a systematic approach. And like any other process, the more we practice the easier it becomes and the more successful we become at implementing it.



Understanding the Process



As we will learn in this training, Abbott's decision-making process consists of three important steps:

- First, a careful assessment of the situation;
- Second, an evaluation of its impact on stakeholders; and,
- Finally, a decision that balances the interests of patients, consumers, Abbott and other stakeholders.

Let's take a closer look at this process now.



THE DECISION-MAKING PROCESS

The Decision-Making Process: Quick Reference

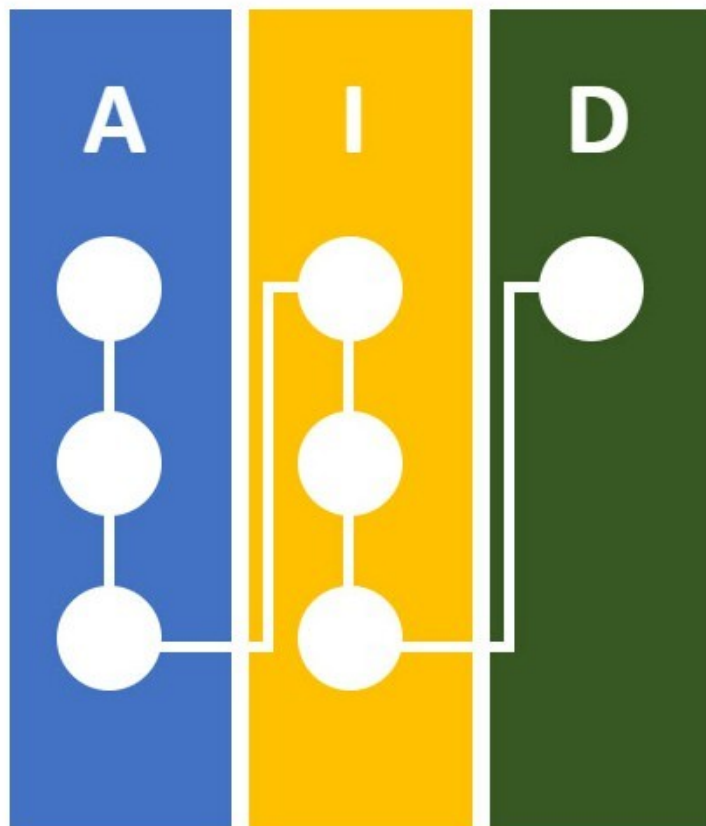


As stewards of Abbott's reputation, all of us have a responsibility to make good decisions on Abbott's behalf.

Good decision making is always deliberative. It requires careful assessment of the facts and follows a systematic approach. And like any other process, the more we practice the easier it becomes and the more successful we become at implementing it.

Abbott's decision-making process consists of three important steps:

- First, a careful assessment of the situation;
- Second, an evaluation of its impact on stakeholders; and,
- Finally, , a decision that balances the interests of patients, consumers, Abbott and other stakeholders.



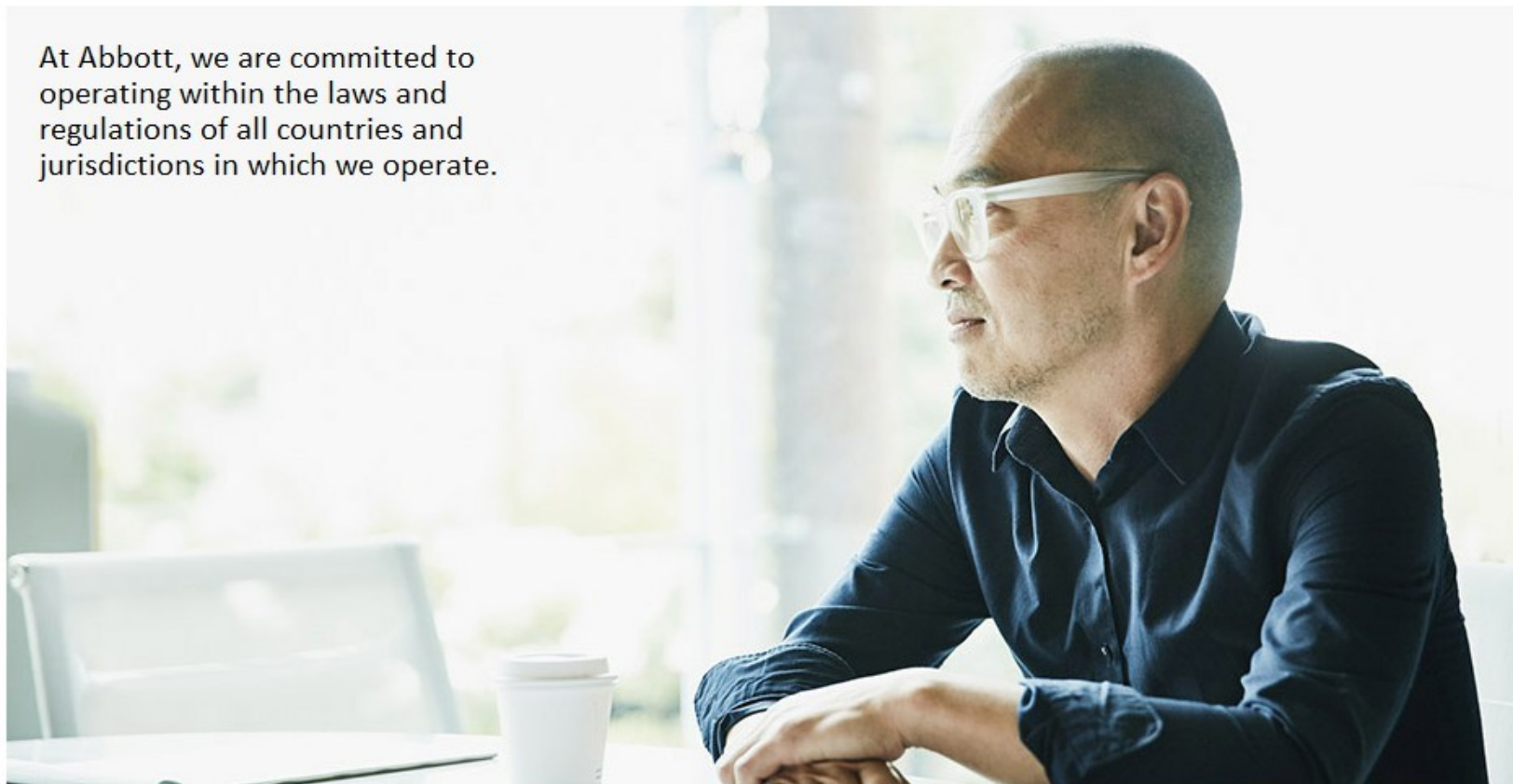


ASSESSING THE SITUATION

Overview



At Abbott, we are committed to operating within the laws and regulations of all countries and jurisdictions in which we operate.



ASSESSING THE SITUATION

Overview



Assess



The first step in ethical decision-making is assessing whether a proposed course of action is legal, compliant with Abbott policy, and in keeping with Abbott values.

This step requires us to ask ourselves three questions.



ASSESSING THE SITUATION

Is it Legal?



Assess



First, is it legal?

Is the course of action that we are considering in compliance with the laws and regulations that govern the healthcare industry generally and the jurisdictions in which we operate specifically?



ASSESSING THE SITUATION

Is it Legal?



Imagine . . .

You are a Sales Representative. A doctor you have worked with previously has recently opened a private practice in your area. The doctor asks if you wouldn't mind helping to organize a meeting with some other physicians in the area. The doctor says: "I don't think it would be appropriate for you to attend the meeting, but if you could help me with the names of some doctors so I can get the invitations out I would be grateful. In any case, it will give you an opportunity to get to know my staff."



ASSESSING THE SITUATION

Is it Legal?



Is this legal?

- ☒ 1. Yes.
- ☒ 2. No.
- ☐ 3. It depends.

Submit





ASSESSING THE SITUATION

Is it Legal?



That's correct!

Whether this is legal will depend on several factors: such as what country you are operating in, whether helping with the names of doctors could be considered providing a service or constitute confidential information, whether there are privacy concerns.

Is this legal?

- ☒ 1. Yes.
.....
- ☐ 2. No.
.....
- ☐ 3. It depends.
.....



ASSESSING THE SITUATION

Is it Legal?



At first sight, it might seem as though the question of whether something is legal or not is obvious or self-evident.

But this may not always be the case.



ASSESSING THE SITUATION

Is it Legal?



We work in a highly regulated industry.

This means that there are laws and regulations that govern all aspects of our operations, including health care compliance, privacy, quality, finance, security, purchasing, human resources, and information systems. Some of these laws you may be familiar with, others you may not. Some are simple to understand, others are complex and require detailed legal analysis.



ASSESSING THE SITUATION

Is it Legal?



Just because there are no local laws that prohibit a certain activity doesn't mean that the activity is legal.

The laws of one country may apply to the work we do in other countries. For example, the Foreign Corrupt Practices Act (FCPA) is a U.S. statute that prohibits firms and individuals from paying bribes to foreign officials. Even though the FCPA is a U.S. law, it applies to activities in every country in which Abbott operates.



ASSESSING THE SITUATION

Is it Legal?



If the answer to the question “Is it legal?” is “No”, our response should be immediate and unequivocal: we should not proceed.

There is no acceptable justification for acting illegally on Abbott’s behalf.



ASSESSING THE SITUATION

Is it Legal?



If, however, we have doubts about whether a particular action is legal or not, we should speak to someone in Abbott's Legal Division or the Office of Ethics and Compliance.

It is their role to help provide advice on legal issues.



ASSESSING THE SITUATION

Does it comply with Abbott Policy?



Assess



The second question we should ask ourselves is: does the proposed course of action comply with Abbott's policies and procedures?



Does it comply with Abbott Policy?



Imagine . . .

You work in Operations. You recently transferred to a new country. Within the first month, a supplier with whom you are negotiating a large contract on Abbott's behalf invites you to a local sporting event. You ask a colleague about Abbott's local policy on the receiving of gifts and entertainment. Your colleague says it is okay to accept the offer: "This is just a normal part of doing business here."



Does it comply with Abbott Policy?



Since your colleague knows the local customs should you accept the offer?

- ☒ 1. Yes. Your colleague has explained that accepting the offer is a normal part of doing business in this country.
- ☐ 2. No. Abbott has a global policy on the giving and receiving of gifts and entertainment that takes precedence over any local policy.
- ☐ 3. It depends on the nature of the gift, its value, and the culture of the country in which you are operating.

Submit





ASSESSING THE SITUATION

Does it comply with Abbott Policy?



That's correct!

It will depend on the nature of the gift, its value, and the culture of the country in which you are operating. The first step is to always check your local policies and procedures. If you still have questions, contact your manager. If you have more questions or need additional guidance, contact Global Procurement.

Since your colleague knows the local customs should you accept the offer?

- ☒ 1. Yes. Your colleague has explained that accepting the offer is a normal part of doing business in this country.
- ☐ 2. No. Abbott has a global policy on the giving and receiving of gifts and entertainment that takes precedence over any local policy.
- ☐ 3. It depends on the nature of the gift, its value, and the culture of the country in which you are operating.

Submit



Does it comply with Abbott Policy?

For example, if we work in U.S. Sales, we are expected to follow our U.S. Ethics and Compliance Policies and Procedures on Interactions with Healthcare Professionals. If we work in a different work area or jurisdiction, we are expected to follow the policies and procedures specific to that job role and the jurisdictions in which we operate.



ASSESSING THE SITUATION

Does it comply with Abbott Policy?



If the answer to the second question: “Does it comply with Abbott policy?” is “No”, we should not proceed.

There are no exceptions. It doesn't matter whether others in our industry are doing it, whether we think that the action is in Abbott's interests, or whether we feel a customer or business is relying on us.

If a course of action does not comply with Abbott's policies and procedures, we should not proceed without discussing with our manager and the Office of Ethics and Compliance.



ASSESSING THE SITUATION

Does it comply with Abbott Policy?



If we have any doubts about whether a proposed course of action follows Abbott policy, we should take the time to check the most up-to-date versions of the relevant policies and procedures which are available on your local Abbott intranet site.

If we still have questions, we should talk to our manager. Our manager knows us and our job role and is closest to the issue. They will also be able to help provide us with advice on policy or procedural issues.

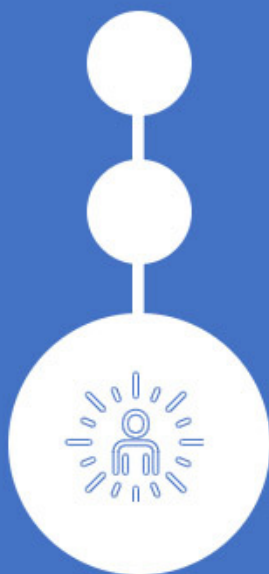


ASSESSING THE SITUATION

Does it Align with Our Values?



Assess



The third question to ask is: does the course of action align with Abbott's values and the principles of honesty, fairness and integrity found in our Code of Business Conduct?



ASSESSING THE SITUATION

Does it Align with Our Values?



Imagine . . .

You work in Human Resources. You are currently negotiating a large contract with a supplier that you have used extensively in the past. During the negotiations, you become aware that the supplier has recently run into some financial difficulties.



ASSESSING THE SITUATION

Does it Align with Our Values?



Would it be okay to use the supplier's financial difficulties to create an unfair advantage and negotiate a massive savings for Abbott?

- ☒ 1. Yes. Any situation that can be used to Abbott's advantage should be.
- ☐ 2. No. You should deal fairly with everyone you encounter in your work.

Submit



ASSESSING THE SITUATION

Does it Align with Our Values?



That's correct!

Our Code of Conduct makes clear that we have an obligation to hold ourselves to the highest ethical standards in everything we do. This includes dealing fairly with coworkers, customers, suppliers, health care professionals, competitors and others.

Would it be okay to use the supplier's financial difficulties to create an unfair advantage and negotiate a massive savings for Abbott?

- ☒ 1. Yes. Any situation that can be used to Abbott's advantage should be.
- ☐ 2. No. You should deal fairly with everyone you encounter in your work.

Submit



ASSESSING THE SITUATION

Does it Align with Our Values?



Just because a course of action is legal and complies with policy doesn't mean it's the right thing to do.

At Abbott, there is an expectation that we do the right thing for the right reasons.



ASSESSING THE SITUATION

Does it Align with Our Values?



If our answer to the question “Does it align with Abbott’s culture and values?” is “No”, we should not proceed – even if we’ve established that the course of action is legal and complies with Abbott policy.



ASSESSING THE SITUATION

Does it Align with Our Values?



If we are unsure whether an action aligns with Abbott's values, we should review Abbott's Values and Culture statement on the Abbott intranet.

We should also take the time to reread our Code of Business Conduct.



ASSESSING THE SITUATION

Assessing the Situation: Quick Reference



The first step in ethical decision-making is assessing whether a proposed course of action is legal, compliant with Abbott policy, and in keeping with Abbott values.

This step requires us to ask ourselves three questions:

1. Is it legal?
2. Does the proposed course of action comply with Abbott's policies and procedures?
3. Does the course of action align with Abbott's values and the principles of honesty, fairness and integrity found in our Code of Business Conduct?

Assess





EVALUATING THE IMPACT

Overview

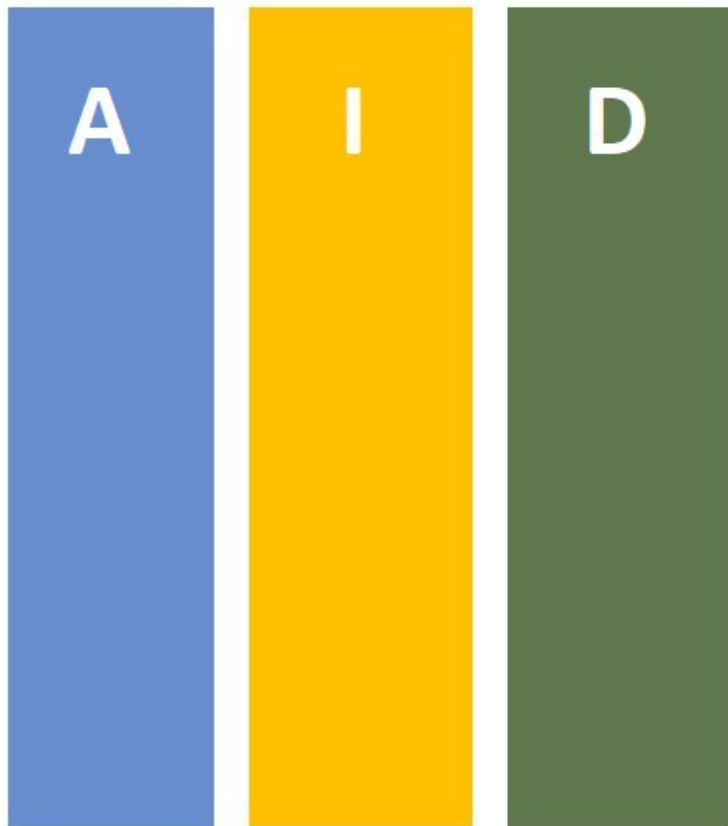


Even though a decision may be legal, compliant with Abbott policy and in keeping with Abbott's values, it still might not be the right thing to do.



EVALUATING THE IMPACT

Overview



The second step in good decision making is evaluating the impact a proposed course of action may have on

- Patients, customers, and consumers,
- Abbott's reputation, and
- Other important stakeholders.

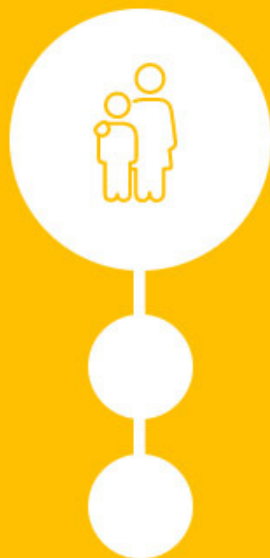


EVALUATING THE IMPACT

The Impact on Patients and Consumers



Impact



Begin the process by considering the impact the decision will have on those who purchase and use our products.





EVALUATING THE IMPACT

The Impact on Patients and Consumers



Imagine you work in logistics at an Abbott manufacturing site.

One of your responsibilities is ensuring the timely shipping of products to warehouses in your region.



EVALUATING THE IMPACT

The Impact on Patients and Consumers



You've noticed that one of the steps that your team engages in is a visual inspection of the product before shipment.

The inspection process seems to be taking up a lot of your team's time. So, you consider cutting the visual inspection step. You begin with an analysis of the data. Here you can see that in the past visual inspections have caught some issues with the printing on the product labels, but cases have been rare.



EVALUATING THE IMPACT

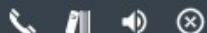
The Impact on Patients and Consumers



You take a few minutes to consider the impact cutting the visual inspection step could have on consumers.

While there is no chance that a low-quality label will pose any health or safety risk to consumers, it could significantly impact the consumer experience. After contemplating the consumers' interests, you decide to continue as normal with the visual inspections and consider other options to save time.





EVALUATING THE IMPACT

The Impact on Patients and Consumers



While not every decision we make will directly impact patients and consumers, many do.

It is important to take the time to consider the potential impact and to make sure that, if a decision does impact patients and consumers, both their interests and those of Abbott are balanced.



EVALUATING THE IMPACT

The Impact on Abbott's Reputation



Impact



We also need to take the time to consider the potential impact our decisions have on Abbott's reputation.



EVALUATING THE IMPACT

The Impact on Abbott's Reputation



Abbott's reputation is our most valuable asset.

As our Code reminds us, we earn our reputation every day by the decisions we make and the actions we take.





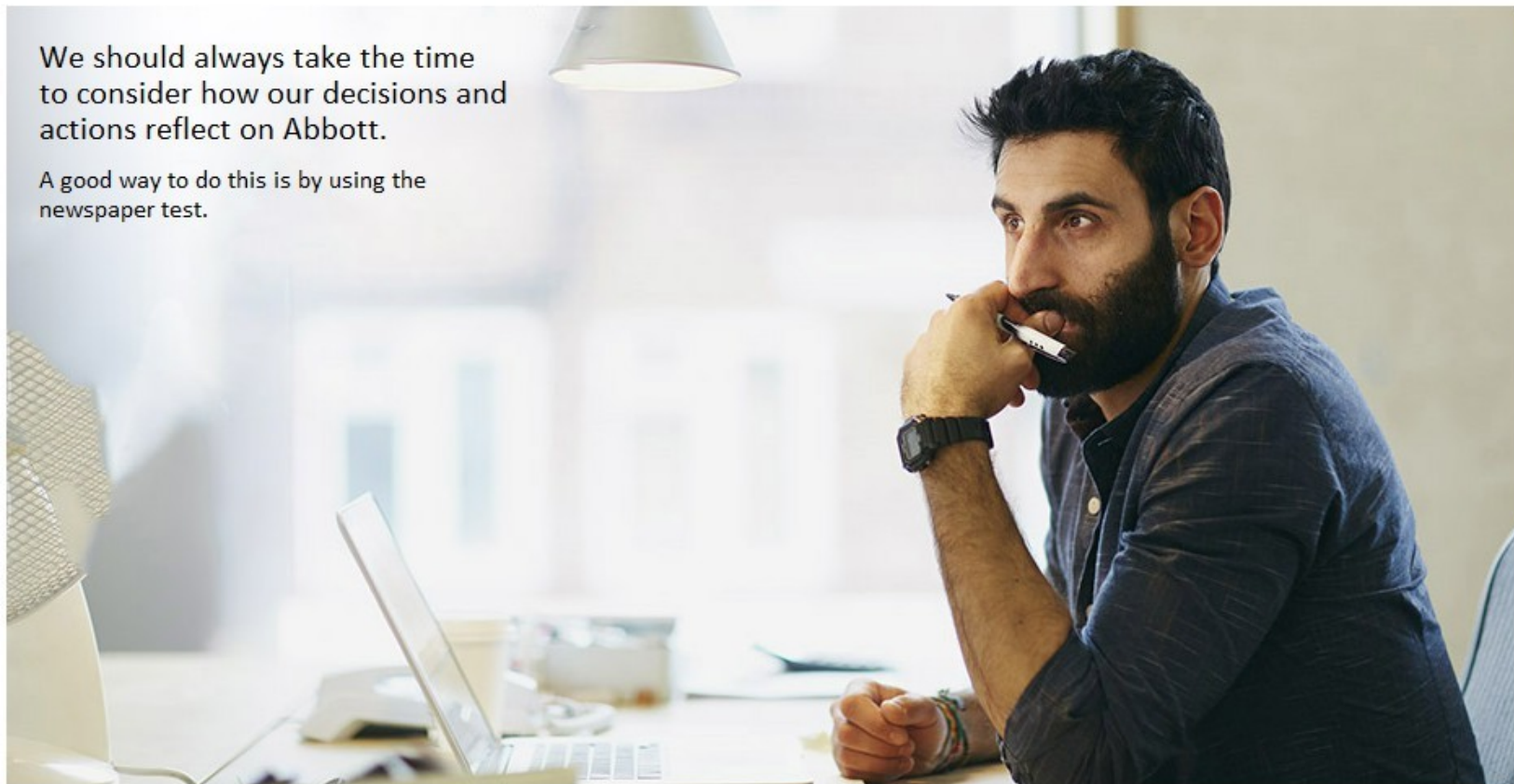
EVALUATING THE IMPACT

The Impact on Abbott's Reputation



We should always take the time to consider how our decisions and actions reflect on Abbott.

A good way to do this is by using the newspaper test.



EVALUATING THE IMPACT

The Impact on Abbott's Reputation



Imagine you are an Abbott general manager for an affiliate.

It's April 2020. The pandemic has just hit. Hospitals all around the world are struggling to secure personal protective equipment (PPE) for their workers.



EVALUATING THE IMPACT

The Impact on Abbott's Reputation



You receive a phone call from an important Abbott customer, an administrator at a large private hospital who asks if you can secure some PPE for them – the administrator says that cost is not an issue, they are willing to pay whatever Abbott wants to charge them.

You reach out to your country's production facility and you are told that there is lot of spare PPE on site.

Now you are faced with the dilemma of whether Abbott should just provide the PPE or sell the PPE to the private hospital at a large profit.



EVALUATING THE IMPACT

The Impact on Abbott's Reputation



You begin by assessing the situation.

There is nothing about the sale that would be illegal, non-compliant with Abbott policy or not in keeping with Abbott's values. Abbott clearly has spare PPE that is not being used. And it would clearly benefit a lot of people.





EVALUATING THE IMPACT

The Impact on Abbott's Reputation



But before you make your final decision you stop and imagine how Abbott selling the PPE to a private hospital at a high price might be reported in your local newspaper:

Healthcare Giant Prioritizes Needs of Private Patients

Where health is concerned, company proves money is all that really matters.



EVALUATING THE IMPACT

The Impact on Abbott's Reputation



After considering how your decision could impact on Abbott's reputation, you decide to decline the request to sell the PPE to the private hospital.

You instead look into a possible donation to your local authority for distribution across the entire health care system.

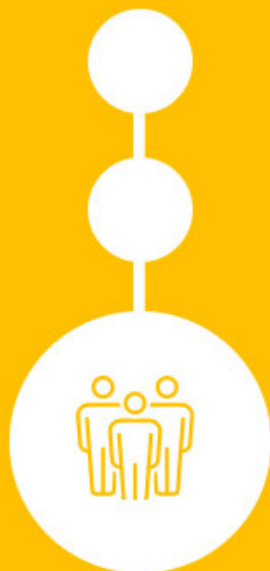


EVALUATING THE IMPACT

The Impact on Other Stakeholders



Impact



Finally, we need to consider the impact our decisions have on Abbott's other stakeholders, such as colleagues, shareholders, the communities in which we operate, and the general public.



EVALUATING THE IMPACT

The Impact on Other Stakeholders



Oftentimes, it is easy for us to forget those not directly involved in the decision-making process.

But the impact our decision can have on colleagues, shareholders, the communities in which we operate, and the general public can be just as profound.



EVALUATING THE IMPACT

The Impact on Other Stakeholders



Imagine you have an important presentation with senior management first thing Monday morning.

It is Sunday afternoon. The office is closed. Just as you are finishing up work on your presentation your Abbott-issued laptop forces a restart.



EVALUATING THE IMPACT

The Impact on Other Stakeholders



You realize a file you downloaded seems to have been infected. You are not sure whether it has impacted other files, but you need to get the presentation to senior management first thing Monday morning.

So, you redo the presentation and save the file. But now you are faced with a dilemma: do you send the file to your work colleagues or do you miss your deadline with senior management?



EVALUATING THE IMPACT

The Impact on Other Stakeholders



You pause and evaluate the potential impact your decision could have on your colleagues.

On the one hand, not sending the file could impact senior management's perception of you.

On the other, sending a file that turns out to be infected could impact not only your colleagues in your department but could spread to others in the company.



EVALUATING THE IMPACT

The Impact on Other Stakeholders



After considering your options, you decide to delay sending the file until it can be okayed by the IT department and instead call your manager to inform them of the situation.

The decision is likely to have some impact on senior management's perception of you, but you decide it's more important to think about the possible effect on the wider Abbott community.



EVALUATING THE IMPACT

Evaluating the Impact: Quick Reference



Even though a decision may be legal, compliant with Abbott policy and in keeping with Abbott's values, it still might not be the right thing to do.

The second step in good decision making is evaluating the impact a proposed course of action may have on

- Patients, customers, and consumers,
- Abbott's reputation, and
- Other important stakeholders.



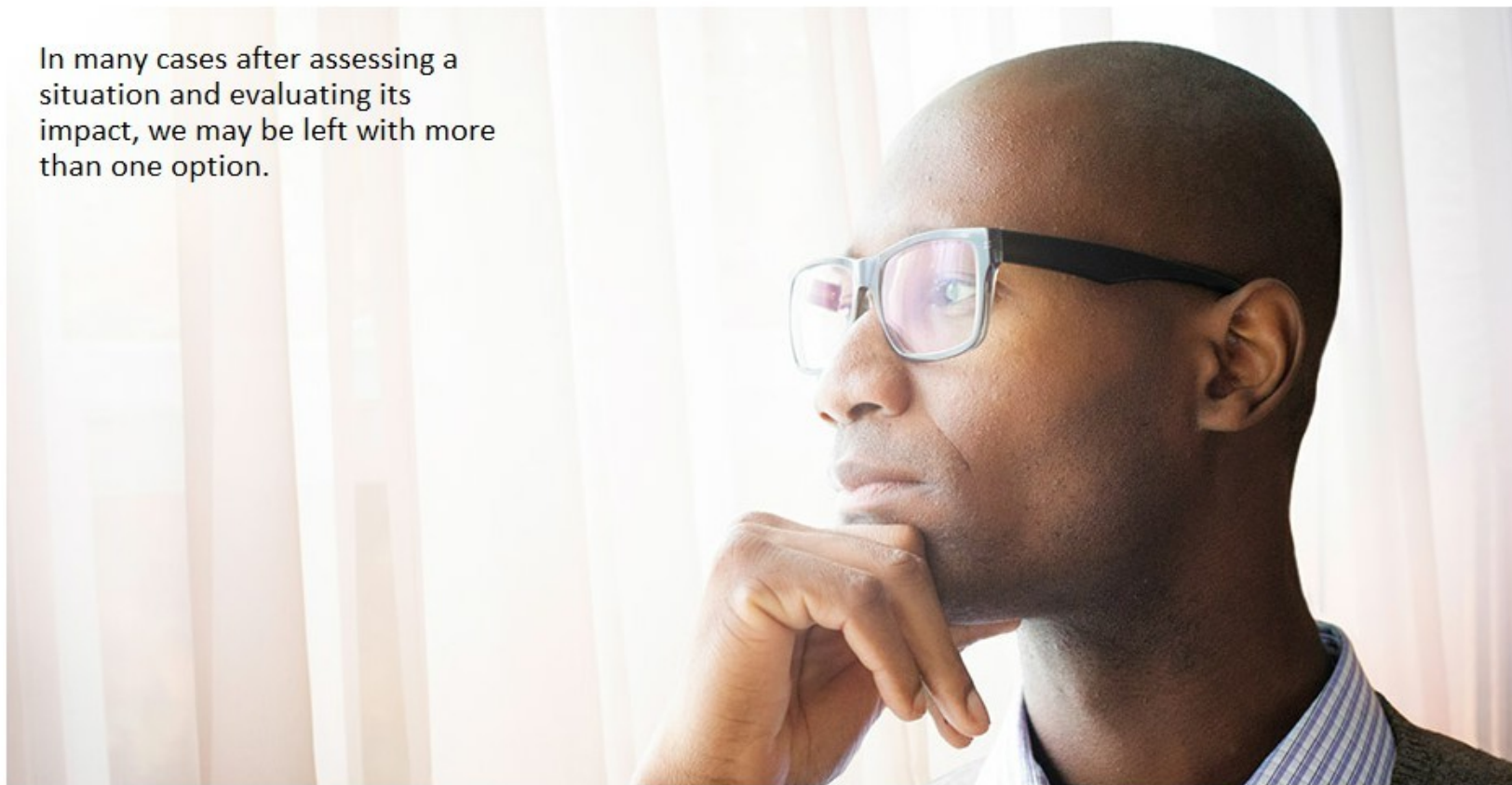


MAKING THE RIGHT DECISION

Overview



In many cases after assessing a situation and evaluating its impact, we may be left with more than one option.





Overview



Decision



The final step in good ethical decision making is about choosing a course of action that balances the interests of all stakeholders.

In some cases, this may mean making a decision that favors the interests of consumers and patients, while another may favor the interests of Abbott or another stakeholder.



MAKING THE RIGHT DECISION

Balancing Competing Interests



While no decision is likely to please all stakeholders equally, a good decision will always be grounded in the principles of honesty, fairness and integrity, and will effectively balance the interests of Abbott and Abbott's stakeholders.





MAKING THE RIGHT DECISION

Help and Support



If, however, after considering all options, you are still unsure about the right course of action, you can always speak to your manager, the Office of Ethics and Compliance, Human Resources or the Legal Division.





MAKING THE RIGHT DECISION

Help and Support



In addition, Abbott has created a decision-making AID in support of this training.

This aid walks you through the ethical decision-making process that we have just covered in this training. We strongly recommend that you use it whenever you require additional support.

The decision-making AID can be found on your intranet [here](#).





MAKING THE RIGHT DECISION

Making the Right Decision: Quick Reference



A good decision will always be grounded in the principles of honesty, fairness and integrity, and will effectively balance the interests of Abbott and Abbott's stakeholders.

The final step in good ethical decision making is about choosing a course of action that balances the interests of all stakeholders.

If, however, after considering all options, you are still unsure about the right course of action, you can always speak to your manager, the Office of Ethics and Compliance, Human Resources or the Legal Division.

In addition, Abbott has created a decision-making AID in support of this training. The decision making AID can be found on your intranet here.

Decision





RESOURCES

Where to Get Help



Manager or Supervisor

If you are unsure about the right course of action or have general questions about assigned task or roles the best place to start is with your immediate manager or supervisor.



Global Policy Portal

For our corporate policies and procedures applicable companywide, visit the [Global Policy Portal](#).



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](#) 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 OEC** – Call 1-224-667-5210 or email oecc@abbott.com with any questions related to ethics and compliance at Abbott.
 - **Divisional or Country OEC** – Your divisional or country [OEC representative](#) can provide additional guidance on divisional or country-specific OEC policies, procedures, and guidelines.
- **Ethics and Compliance Helpline** – Visit our multilingual [Ethics and Compliance Helpline](#) 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](#) to access compliance-related applications and resources geared towards interactions with Health Care Professionals and Health Care Organizations, as well as third parties.



Human Resources

For employee-related issues, such as concerns involving management and/or other employees, contact your local [Human Resources](#) representative.



Legal Division

If you have questions about the laws, regulations, and acceptable business practices, the [Legal Division](#) can assist you.



Other Resources

There 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 and 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.





RESOURCES

Reference Material



COURSE TRANSCRIPT

Click [here](#) for a full transcript of the course.





KNOWLEDGE CHECK

Introduction



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 to begin.

[Knowledge Check](#)



KNOWLEDGE CHECK

Question 1



What are some common causes of poor decision making?

Check all that apply.

- ☐ 1. Failure to consider competing interests.
- ☐ 2. The perception that there is pressure to perform.
- ☐ 3. Careful deliberation.
- ☐ 4. The perception of customer expectations.
- ☐ 5. Time constraints.





KNOWLEDGE CHECK

Question 2



Good decision making is:

- ☐ 1. About wanting to do the right thing.
- ☐ 2. Instinctual.
- ☐ 3. Deliberative.





KNOWLEDGE CHECK

Question 3



Abbott's decision-making process consists of:

Check all that apply.

- ☐ 1. A careful assessment of the situation.
- ☐ 2. An evaluation of its impact on stakeholders.
- ☐ 3. Recognizing and resolving ethical dilemmas.
- ☐ 4. Balancing of the interests of patients, consumers, Abbott and other stakeholders.





KNOWLEDGE CHECK

Question 4



An activity is legal as long as there are no local laws that prohibit the activity?

- ☐ 1. True.
- ☐ 2. False.





KNOWLEDGE CHECK

Question 5



If a course of action is legal and complies with Abbott policy, we can proceed.

- ☐ 1. True.
- ☐ 2. False.





KNOWLEDGE CHECK

Question 6



The newspaper test is a good way of assessing the impact a proposed course of action can have on:

- ☐ 1. Patients and consumers.
- ☐ 2. Abbott's reputation.
- ☐ 3. Other Abbott stakeholders.





KNOWLEDGE CHECK

Question 7



The second step in good decision making is evaluating the impact a proposed course of action may have on:

Check all that apply.

- ☐ 1. Patients, customers, and consumers.
- ☐ 2. One's own job prospects.
- ☐ 3. Abbott's reputation.
- ☐ 4. Other important stakeholders.





KNOWLEDGE CHECK

Question 8



When making a decision, never choose a course of action that favors the interests of one stakeholder group over another.

- ☐ 1. True.
- ☐ 2. False.





KNOWLEDGE CHECK

Question 9



If you are unsure about the right course of action, you should speak to:

- ☐ 1. Your manager.
- ☐ 2. The Office of Ethics and Compliance.
- ☐ 3. Human Resources.
- ☐ 4. The Legal Division.
- ☐ 5. Any or all of the above.





KNOWLEDGE CHECK

Question 10



Abbott has created a decision-making AID to support you in the decision-making process.

- ☐ 1. True.
- ☐ 2. False.

ALL QUESTIONS REMAIN UNANSWERED

Submit

