

FREQUENTLY ASKED QUESTIONS

Q: What do I do if someone tells me about a product quality issue?

A: If we become aware of an unfavorable user result that occurred while using an Abbott product, we must report it to the appropriate individuals or groups within Abbott.

We must report adverse events with any of our products in the timeframe required by our division procedures, even if we are not sure there is a cause-and-effect relationship between the product and the "event."

Q: What do Abbott policies and procedures require with respect to product promotion?

A: One of the key, universal principles related to product promotion is that we may not promote or pre-sell a product that has not yet been approved or cleared by the relevant regulatory body for the location or usage in question. If a health care professional asks about uses for Abbott products that are beyond the scope of approved labeling (sometimes referred to as "off-label" uses), the inquiry should be directed to the designated function for such inquiries in your division, which normally resides in Medical Affairs.



Q: Why should I report a concern?

A: We all share in the responsibility to live our values every day. That includes keeping an open dialogue by asking questions when we don't know what to do and reporting concerns related to our business activities.

Raising a concern on noncompliance continues our commitment to act ethically in all aspects of our business and fosters a culture of compliance. Your actions can make a difference.

Q: What if I face retaliation?

A: The company strictly forbids any retaliation against any person who raises a concern. Complaints made in good faith will not expose you to any sanctions, regardless of whether the underlying facts prove to be correct. If you believe you have faced retaliation of any kind, please report it so that the company can investigate.

Q: I work in Finance and because of my academic performance, I have always been in contact with the academic world, so a University has contacted me to teach classes on Analysis and Evaluation of Financial Statements. I've discussed with my





manager, and we agree that it is a job where the functions are completely independent of those in Abbott; the work schedule does not interfere with my Abbott work and it does not require the disclosure of confidential information from Abbott. Is this a conflict of interest?

A: Because outside employment could pose a conflict of interest, you were correct to disclose the potential conflict of interest and discuss with your manager. After you've consulted with your manager, evaluated the situation together, and determined that the new job does not affect the performance of duties for Abbott, this situation would not be considered a conflict of interest.

Q: Can I use my work computer to do on-line shopping during the holiday season?

A: Abbott Policy allows employees to use Abbott's computers for this type of personal use as long as it is incidental and does not conflict with work responsibilities. For more information see: Abbott's Electronic Use Policy.

Q: What do I do if I inadvertently sent a list of patient names and email addresses to the wrong external email recipient?



A: Patient names and other patient information are considered sensitive information we need to protect. If such information has been compromised in any way, you should follow internal processes to notify relevant internal stakeholders about the incident. You should contact Abbott's Global Service Desk to report this incident.

Q: What should I do if I receive a call or an inquiry online from someone asking me about the latest news from Abbott? The person who called me seemed very professional, and indicated that he is doing a formal survey across the health care industry about current industry developments. Am I allowed to participate?

A: Providing information that is non-public about Abbott's business could be a problem. Some people contacting Abbott for information of this nature are trying to piece together information from different sources to gain an insider view of what is happening at our company. Until Abbott is ready to publish its results or other information about our business, you should keep information about your work confidential. Be sure to know what is considered confidential and non-confidential with respect to the information related to your work. If you have questions, contact your manager, OEC or Legal. Refer press inquiries to Public Affairs.



Q: How do I tell the difference between a prohibited facilitation payment and a legitimate payment to get a service performed more quickly, like when I want to apply for a visa or seek customs clearance on a "fast-track" basis?

A: Some differences include the amount of documentation and whether the same option is always available to every applicant. Fees for legitimate "fast-track" options are normally published, with a set fee, and accompanied by clear, standard documentation such as an application form and receipt from the fee issuing entity. If you are unsure whether a payment to get services performed more quickly is permitted, you should contact your manager, OEC or Legal.

Q: During national or religious holidays are we able to give a health care professional a cultural courtesy?

A: Cultural courtesies related to national or religious holidays may be given in many locations, provided that they are allowed by local procedures and do not exceed monetary limits. You should check your local OEC procedures to determine what items, if any, may be provided.



Q: I received a gift from a supplier during the holidays, and I am not sure if I can accept it. What should I do?

A: It depends on the nature of the gift, its value, and the culture of the country. If the value of the gift you are receiving is not modest, you should not accept it and return it to the supplier explaining that our policy does not permit employees to receive expensive gifts. On the other hand, if the amount of the gift is modest and considered reasonable based on the culture of the country, you can accept it, and the best approach is to share it with the employees of the department, if the nature of the gift permits. In both cases, transparency is the key element in such circumstances; therefore, you should notify your manager about it and if you have further questions you should contact Abbott purchasing.

Q: While on a business visit to a health care professional, the sales representative is asked by the health care professional if they can discuss the business topics over lunch. Is this permissible according to our Code of Conduct?

A: In most countries, having a meal with a health care professional in conjunction with a business conversation is permissible. You should check your local OEC procedures for requirements and monetary limits.



Q: What do I do if I become aware that someone has created an "unofficial" separate account that has not been reported to Finance?

A: You should report this to OEC, Legal or Finance so that it can be reviewed.

Q: There are so many laws around the world and in my country, how can I possibly know which ones I need to follow and what they say?

A: Abbott's policies and procedures are regularly updated to accurately reflect the changes to law. Be sure to follow all relevant policies and ask OEC or Legal if you have questions.

