



Common Questions

Why should I report a concern?

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.

We earn our reputation every day by the decisions we make and the actions we take. 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.

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother raising a concern?

Abbott chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. One only has to consider what happened in recent corporate scandals to see the disastrous effects a seemingly harmless lapse in ethics can have on an otherwise healthy company. If you know of any incidents of unethical misconduct, consider it your duty to yourself and your co-workers to raise a concern.

If I see an incident, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior you believe unethical to our code of conduct, we expect you to raise a concern. You have several channels for raising concerns, including your direct manager or other member of our management team, your local/division OEC contacts, HR, and Global Security. Ultimately, serious concerns raised through channels other than OEC's Speak Up website/helpline should be escalated and will be handled by OEC Investigations. Providing the most accurate information about a concern is crucial, so keep in mind that several layers can result in a partial/inaccurate message. We recognize, however, that there may be circumstances when you are not comfortable raising a concern through one channel or another. In such circumstances, we would rather you raise a concern through another channel, (even if the message is partial/inaccurate), than keep the information to yourself.



Can I still call my Office of Ethics and Compliance contact?

Yes, you may raise concerns to or consult with anyone in the Office of Ethics and Compliance with whom you feel comfortable connecting. If the matter requires an investigation, that contact will escalate as appropriate.

I would like to raise a concern, but I don't want to get anyone into any trouble.

While you may not want to get a co-worker or manager into trouble, you need to remember:

- First, that you have an obligation to raise a concern of an actual or potential misconduct;
- Second, that by raising your concern, you're actually helping protect the larger Abbott community, your colleagues, the company, and our stakeholders;
- Third, that if you want to remain anonymous, you can. Although, we encourage you to provide some form of contact information, (still possible while remaining anonymous), so that if follow up is necessary we can reach you.

Does management really want me to raise a concern?

We certainly do. In fact, we need you to raise a concern. You know what is going on in our company -both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your raising a concern can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

What type of situations should I raise a concern?

You should raise a concern for any unethical behavior of our Code of Conduct, or another concern you may have. You also can use the Speak Up Website/helpline to ask questions, report conflict of interests, and share compliance success stories.



I am not sure if what I have observed or heard is a breach of company policy or involves unethical conduct, but it just does not look right to me. What should I do?

Raise a concern. We would rather you raise a concern that turns out to be harmless than let possibly unethical behavior go unchecked because you were unsure.

What if my boss or other managers are involved in unethical behavior? Won't they get notified and start a cover-up?

No. Concerns raised to OEC are handled by independent employees of Abbott, usually OEC or those accountable to OEC, that are not in the reporting line of those accused of compliance incidents.

When is the best time to raise a concern?

The sooner the better. The longer you wait to raise your concern, the worse it may become, and, in fact, it may be unethical to remain silent.

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool to assist management and employees to work together to address concerns in the workplace, all while cultivating a positive work environment. Abbott purchased a license to use the EthicsPoint system to give employees more options for asking compliance questions, raising compliance concerns, reporting conflicts of interest and sharing compliance success stories.



Why do we need a system like EthicsPoint?

Abbott believes that employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity. Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud. EthicsPoint helps us meet such requirements while also fostering a culture of integrity and ethical decision-making. EthicsPoint provides an avenue for employees and/or others to raise serious concerns, perceived or known in the work environment.

Why have we contracted with EthicsPoint for the reporting of concerns?

EthicsPoint is an independent company that provides secure, confidential telephone and web-based systems for use by those who wish to report a concern regarding business conduct. Our company is one of many that contracts with EthicsPoint for this service in the belief that potential reporters will be more comfortable reporting a concern if they know they will be reporting to an independent third-party. In addition to providing service 24 hours a day, EthicsPoint offers translation services that allow telephone and web reports to be submitted in dozens of languages.

What is EthicsPoint's role?

EthicsPoint's principal responsibilities are:

- Provide confidential telephone and web-based options for reporters to submit concerns about business conduct;
- Protect the identity of reporters who wish to remain anonymous;
- Provide translation services for those reporters who wish to report in languages other than English;
- Transmit information about the concern to designated resources within your company responsible for ethics and compliance so an appropriate investigation can be conducted; and
- Enable communication between an anonymous reporter and the company by serving as an intermediary which can relay follow-up questions and answers, as well as information about the resolution of the case.

It is not EthicsPoint's role to take action to address the concern, only to transmit the concern to the appropriate designees.



What if this is an emergency?

Concerns about an immediate threat of physical harm or damage to property should not be reported to EthicsPoint. If you require emergency assistance, please contact your local emergency services.

How can I raise my concern to EthicsPoint?

If you wish to raise a concern, you may complete the raise a concern form on this website, or you may speak with a specialist in EthicsPoint's Contact Center, which answers calls to the specially-designated hotline maintained by the company. Regardless of which option you select, you will have the option to remain anonymous, if you so choose.

The number you should use to contact the telephone hotline can vary by country. In most cases, the company offers a telephone number you can call with no cost to you. Note the hotline may initially be answered in English. The specialist who answers your call will arrange for fluency in your native language if you would prefer to raise your concern in a language other than English. Contact Center Specialists are available 24 hours a day, 7 days a week.

Where do I get a report key if I do not already have one?

If you not already have a report key, but do have knowledge of serious incidents, perceived or known in the work environment, you will need to raise a new concern, either using the Speak Up website form or through the helpline. Once your report has been generated, you will be given a report key and asked to create a password. With the report key and your password, you can return to the EthicsPoint system again, either by Internet or telephone, and access the original report.

You will then be able to check the status of your report by using your report key and password.

How can I monitor progress on my concern?

At the end of your report, you will be provided with a report key and asked to create a password. With those two pieces of identification, you can follow up on the report by visiting the Speak Up website portal or contacting the company hotline. You may need to wait several days after you make your initial report, at which point you can monitor progress on your report and learn whether any additional information is needed from you to address your concern.



What if you have questions for me regarding my concern?

EthicsPoint provides functionality that enables company representatives to post questions for you, even if you raise a concern anonymously. When you receive your report key, you will be provided with the amount of time we expect for the report to be processed. When that time has passed, we strongly suggest you check to see if any questions have been posted. Providing the opportunity for such anonymous dialogue means situations may not only be identified but can also be resolved, no matter how complex.

What should I do if I lose my Report Key or password?

Because of the high level of confidentiality that is maintained for reports, if you lose your report key or password, you will be required raise a new concern. You can mention in the new report that this matter relates to another concern you supplied earlier.

Should I identify myself?

If you choose to identify yourself in raising your concern, the company will make every reasonable effort to hold your name in confidence during the investigation. Many investigations can be more quickly and effectively completed when the reporter is identified because it allows company investigators to follow up directly with the reporter.

May I raise my concern anonymously?

In all countries except those that prohibit anonymous reporting, you may raise your concern anonymously by using either the web-based form or the telephone hotline, both of which are operated by EthicsPoint. When you complete the report submission process, you will be provided with a report key and asked to create a password. Retain these to follow up on the report you submitted.

When you check back, you can monitor the progress on your concern and add additional information, if necessary. This will also allow the company to ask follow-up questions, while protecting your anonymity if applicable.

If you choose to raise a concern anonymously, please take care not to provide information that may personally identify you, such as your reporting relationship to others in the company or your physical work location.



It is my understanding that any concern I send from a company computer generates a server log that shows every website my PC connects with; won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses; no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable raising a concern on your work PC, you have the option of using a PC outside our work environment, (such as one located at an Internet café, the library, at a friend's house, etc.), through the Speak Up secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports generated during business hours.

Can I still raise a concern if I don't have access to the Internet?

If you do not have access to a computer, you can always call the main OEC phone number in Chicago 1-224-667-5210 and ask to be transferred to the helpline or the OEC Investigations group.

I am concerned the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity. To further ensure your anonymity, you - as a reporting party - need to be careful not to reveal any identifying details as part of your report. For example, "from my cube next to Jan Smith ..." or "in my 33 years ..."

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information you would provide in an Internet-based report; the interviewer will type your responses directly into EthicsPoint's secure environment. Hotline-based reports have the same security and confidentiality measures applied to them during delivery as Internet-based reports.



What if I want to be identified with my report?

There is a section in the report where you may identify yourself, if you wish.

If I raise a concern, will it remain confidential?

Preserving the confidentiality of any concern and subsequent investigation is a priority. OEC maintains the confidentiality of those involved in an investigation to the fullest extent possible. In addition, all employees involved in such matters are advised of the requirement to maintain confidentiality and to discuss only as authorized. If any employee violates these instructions, he or she is subject to disciplinary action.

Where do these reports go? Who can access them?

Reports are entered directly to an EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within Abbott who are charged with evaluating the report, based on the type of incident and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Are follow-ups on concerns as secure as the first one?

All EthicsPoint correspondences are handled in the same strict confidence as the initial report, continuing under the umbrella of anonymity, if you so choose.

How does the company investigate concerns?

EthicsPoint notifies designated company representatives when a concern is received. Abbott then commences an appropriate investigation, using internal or external resources with expertise in conducting investigations. The information you provide about a potential incident is shared with appropriate investigation team members, and the concern is investigated promptly and discreetly.



I just learned that a co-worker has been accused of violating a policy and an investigation is being launched. I can't believe it's true, and I think it's only fair that I give my co-worker a heads-up, so he can defend himself. Is it okay if I tell him?

No, you should not tell him. Your co-worker will be given an opportunity to respond to the allegation, and Abbott will conduct a fair and impartial investigation. The allegation may have implications not only for the individuals involved but also for our company. Giving your co-worker a heads-up could jeopardize the investigation and expose Abbott to additional risk. Such an action may also subject you to disciplinary action.

What if I face retaliation?

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 or result in any corrective action. If you believe you have faced retaliation of any kind, please report it so that the company can investigate.

How long is my information retained?

We only collect as much information as we reasonably need to respond to your query and/or allegation. Your information will be retained for two years following the closure of an investigation, unless there is a local legal requirement to retain your information longer or delete your information earlier.

What are my rights with regards to information access, information correction and information related questions?

In accordance with your local law, Abbott will provide you with the ability to access and correct your information following verification of your identity. For information about accessing or correcting your information or if you have any questions in relation to the treatment of your personal information, please contact investigations@abbott.com.



How does Abbott secure my personal information?

Abbott takes reasonable and appropriate administrative, technical, physical and organizational measures to protect your personal information in our possession and/or under our control from loss, misuse and unauthorized access, disclosure, alteration, and destruction. Abbott requires third parties including EthicsPoint to correctly and appropriately safeguard your personal information we share with them and hold your personal information securely and confidentially.

Transfer

Responding to your query and/or concern, we may need to transfer your personal data outside your country of origin and your personal data may be shared between Abbott's group companies and third parties that help us provide this service, in accordance with the [Employee Notice Regarding Use of Personal Data](#). Your personal data will also be stored by EthicsPoint in the U.S. on its secure server. EthicsPoint has Safe Harbor certification for transfers of EEA personal data to the U.S.