

Abbott

Comprehensive Ethics and Compliance Program

Introduction

The Investors section of Abbott Laboratories' website (<http://www.abbott.com>) conveys the essence of Abbott's ethics and compliance program (the "Program"). Abbott's Program reflects Abbott's commitment to compliance with the laws and regulations applicable to our business, including the California Health and Safety Code §§119400-119402 (the "California Act"). This document describes the fundamental elements of Abbott's Program. The reader is also encouraged to review the Abbott Code of Business Conduct ("Abbott Code") in the Investors - Governance section of Abbott's website. Additional information on the Program is detailed in Abbott's annual Global Sustainability Report (<https://www.abbott.com/responsibility/sustainability.html>)

Interested parties may also call 1-855-294-4584 to request a copy of this document or any of the above-referenced materials.

Program

Abbott's Program is an integrated, company-wide program that is based on company values, laws and regulations. It is organized around the seven elements of an effective compliance program as set forth in the voluntary "Compliance Program Guidance for Pharmaceutical Manufacturers" published in April 2003 by the Office of Inspector General, U.S. Department of Health and Human Service ("HHS-OIG Guidance"). The Program also requires compliance with voluntary industry guidelines, including the Advanced Medical Technology Association Code of Ethics on Interactions with Health Care Professionals ("AdvaMed Code"), which was most recently revised as of June 1, 2022. Following is a brief description of each of the seven elements of Abbott's Program.

1. Leadership

Abbott's Chief Ethics and Compliance Officer (CECO) is the corporate officer responsible for leading our global ethics and compliance program and managing our Office of Ethics and Compliance (OEC). The CECO provides regular briefings to our Chairman and CEO, executive leaders, the Board of Directors, and Public Policy Committee. The CECO chairs Abbott's Business Conduct Committee (BCC) — a team of executive-level leaders and Abbott's Chairman and CEO. The BCC meets regularly to discuss potential risk areas and mitigation measures, to review compliance program performance and metrics, including plans for improvements, and to evaluate legal and regulatory changes and best practices.

2. Written Standards

Code of Business Conduct

Our Code of Business Conduct, available in 29 languages, is foundational to ethical conduct at Abbott. Every employee is required to read and certify adherence to the code annually. It and other policies are designed to align with laws, regulations, and industry guidelines issued by medical technology trade associations, including AdvaMed, APACMed, MedTech Europe, and Mecomed.

Our Code of Business Conduct contains a section dedicated to promoting and selling our products with honesty and integrity. We expect product materials and communications will be balanced and truthful, consistent with the approved label in the countries we operate, and consistent with scientific evidence. We require compliance with each country's laws and regulations that govern how, where, and when we are permitted to promote medical devices, diagnostics, nutritional products, and medicines. Our code also explains that we may not promote or pre-sell a product that has not yet been approved or cleared by the relevant regulatory body, and any requested information beyond the scope of approved product labeling must be directed to the appropriate medical or scientific function for response.

Policies and Procedures

In addition to our Code, we adopt policies and procedures that guide employees as they conduct their day-to-day activities. They encompass relevant laws and regulations, including food and drug laws and laws relating to government health care programs. They also take into account industry best practices, including provisions of the updated AdvaMed Code, as well as other applicable industry codes. We regularly update our policies to incorporate changes to the law and industry codes, including rules regarding gifts, meals and education we provide to health care professionals.

3. Effective Lines of Communication

Our code emphasizes employees' responsibility for reporting noncompliance concerns, including those related to workplace discrimination or harassment; we strive to ensure they feel safe doing so without fear of retaliation. This applies to whistleblowing, or anyone reporting violations in good faith, with anti-retaliation principles and language included in our Global Compliance Policy on Reporting Concerns, Global Compliance Standards, and human resources policies, including Employee Problem Solving, Workplace Harassment, and Violence in the Workplace. Abbott encourages employees and others to report instances of retaliation. We investigate reports, identify remedial actions as appropriate, and appropriately discipline employees as needed.

We have defined avenues and processes for asking questions and reporting suspected or actual violations of our code, policies, or procedures. In addition to reporting to managers, the OEC, or Legal, this includes our Speak Up tool, through which employees and external parties, including suppliers, can confidentially and — where permitted — anonymously raise concerns of potential misconduct. Speak Up can be accessed by telephone, email, or internet 24 hours a day, seven days a week.

All allegations reported to the OEC Investigations Group are investigated and documented. Specifically, once an allegation is received, an assigned investigator is tasked with examining the allegations and a

report is sent to a Director, or more senior member of the OEC, for review to ensure consistency and completeness. Where necessary, the OEC then works with management and human resources to implement corrective action, which can range from counseling and coaching to termination.

4. Training

Training and education programs for employees increase their awareness of our Code's precepts and the legal and ethical implications of their actions and behaviors. Abbott ethics and compliance officers work with our local commercial teams throughout the world to help them conduct trainings and education programs that help ensure compliance and strengthen Abbott's reputation as a responsible corporate citizen while enhancing relationships with customers and other stakeholders.

Upholding the highest ethical standards is the responsibility of everyone at Abbott. Offered in 93 countries and available in 26 languages, our online Legal and Ethical Resource Network (LERN) training educates employees on our Code of Business Conduct. The LERN program also shares practical guidance on recognizing and responding to legal and ethical issues. The LERN curriculum includes annual certifications on the code and conflicts of interest in addition to other training and education courses, with a key focus on interactions with healthcare professionals. There are also many live, in person training sessions on specific topics.

5. Accountability

Abbott employees are expected to adhere to our Code as a condition of their continued employment. Any employee violating our Code of Business Conduct, policies, or procedures is subject to appropriate disciplinary action, which may include termination. Employees refusing to cooperate in investigations — or knowingly reporting false concerns, or ones intended to threaten, intimidate, or retaliate — may also be subject to disciplinary action. Disciplinary actions can range from coaching and retraining to verbal or written warnings, financial penalties, or termination.

6. Assessment

The OEC utilizes results from internal investigations, internal audits and internal monitoring programs to assess the effectiveness of, and identify areas for improvement in, the compliance program and relevant business practices. In addition, we consider the external environment, including government investigations, settlements, industry codes and government guidance to identify new opportunities to enhance the compliance program.

7. Remediation

Results of investigations, audits and monitoring are communicated to the appropriate OEC staff and business leaders. When an area for improvement is identified, the OEC partners with the business to implement corrective actions. Managers are made aware of disciplinary actions associated with investigations and may take this into account when conducting performance assessments. In addition, Abbott's recoupment policy allows the company to seek recoupment of incentive compensation, and/or existing awards, or reduce future awards if it determines that a senior executive engaged in significant misconduct or failed in a supervisory capacity.

Declaration for purposes of the California Act

In accordance with the California Act, Abbott has established a specific annual dollar limit of \$3,000, which applies to promotional materials, items, and activities provided by an employee of relevant Abbott businesses to covered recipients in California. In addition, the following expenses are excluded from the limit: expenses that are directly associated with payments statutorily excluded from the limit (e.g., meals for consultants), items provided to health care professionals that are ultimately intended for patients or consumers, receptions at third party educational or professional meetings. To the best of its knowledge, Abbott declares that as of July 1, 2023, it is in all material respects in compliance with the requirements of the California Act.