



abbvie

# INSPIRED BY INTEGRITY

The AbbVie Code of Business Conduct



OUR SCIENCE, OUR SKILL  
AND OUR INNOVATIVE  
SPIRIT ARE DEVOTED  
TO BRINGING IMPROVED  
QUALITY OF LIFE TO MARKET.



## CEO MESSAGE

### Dear Colleague:

Welcome to AbbVie's new Code of Business Conduct. I say "new" because we've rewritten the Code to ensure that it is evolving just as our culture is evolving. All of us at AbbVie are hard at work making sure we do things The AbbVie Way – with an agility and transparency befitting our biopharmaceutical company. This new draft of the Code is updated to reflect The AbbVie Way. It is, essentially, an outline that sets clear expectations about how to do the right thing, the right way. The AbbVie Way. Think of it as a guidebook, to be consulted as you go about your job.

What's not new in this revised version of the Code is its purpose and the foundation upon which it was created. The Code is built upon the Values we hold dear – legacy Values that harken back to our company's founding nearly 130 years ago. It's up to each of us, as AbbVie employees, to build upon those Values, and continue to enhance our reputation, by holding ourselves to the highest standards of honesty, fairness and integrity as we perform our jobs. And that's where the Code can help. But only if you use it.

The Code wasn't created as a "rule book" to trip us up. It was created to serve as an active, vibrant document that can help us, in the simplest terms, do the right thing. It's not something to be skimmed and then put on a shelf. My hope is that each AbbVie colleague will consider the Code a tool to help direct their efforts so they can make the best possible decisions every time. It should be as close at hand as the phone or computer, ready to assist when needed.

The Code provides guidance and direction for our efforts. It describes what we believe in and what we strive to deliver to those we serve: patients, healthcare providers, shareholders, business partners and our fellow employees. We all share in the responsibility to live by our Code. This helps differentiate AbbVie, ensures our success and, ultimately, affects the quality of life of the people we serve.

### Your Responsibility

So, please remember, when you need to make a tough choice, consult the Code. If you need to discuss further, your AbbVie management and colleagues, including our Ethics and Compliance Office and Legal Department, are always there for you. If you still have questions or concerns, the Ethics and Compliance Helpline is available toll-free, 24/7.

Thank you for your close attention to our Code, your adherence to its essential principles and all your efforts to drive toward success The AbbVie Way.

Best Regards,

**Richard A. Gonzalez**

Chairman of the Board and Chief Executive Officer



## CECO MESSAGE

### Dear Colleague:

We all share in the great pride of working for AbbVie. Our pride comes from the positive difference we make in the lives of people around the world.

Just as important as *what* we do is *how* we do it. Our success is grounded in honesty, fairness and respect. These principles guide us in making good choices, and knowing that we all follow the same principles inspires confidence in us by others. In fact, our innovations, our discoveries and our business performance are only possible when we work together to maintain these principles.

### This is why we have a Code.

Look to it when you need to understand what's expected of you. For more detail, refer to relevant AbbVie policies and procedures. Remember that each of us is accountable for our individual choices and for promoting an ethical workplace. Don't wait for someone else to correct inappropriate behavior, which could put our culture of integrity and our company at risk. Do your part – that's our way.

**Karen Hale**

Vice President, Chief Ethics and Compliance Officer



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INSPIRED BY  
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## INTEGRITY IN OUR WORKPLACE

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# WE HONOR OUR CODE

EVERY DAY WE HAVE THE OPPORTUNITY TO PURSUE OUR PASSION FOR DEVELOPING AND MARKETING PRODUCTS THAT IMPROVE WORLDWIDE HEALTH. Trust is not given. It's earned every day through every action that we take. This means that every decision we make has an impact on the lives of many people. And our individual actions impact the entire company. Our Code guides us in making good decisions. It points us to policies and procedures that apply to us. It also helps us enjoy a more satisfying workplace.

Our Code represents the high standards that make us one of the world's most respected companies. We expect all AbbVie employees to act in compliance with our Code. Using both internal and external resources, we conduct routine and special reviews of our business practices to verify compliance with the Code, our policies and procedures, and the law. These checks on our business processes allow us to identify areas where we can make improvements and correct potential concerns to be sure we conduct business the right way.

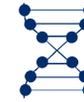


## THIS IS OUR WAY

Cultural variations in societies around the world can result in different perspectives on business conduct. Where local customs conflict with our Code, follow the Code. If you are not sure what to do, ask your manager or contact the [Office of Ethics and Compliance](#) or our [Legal Department](#).

## OUR VALUES

Our values are the foundation of our Code. They are the attributes that define our success. We are committed to these values in all of our work for and with AbbVie.



### PIONEERING

Leading-edge science. We set our sights on pioneering solutions that advance healthcare.



### ACHIEVING

Customer-focused outcomes and world-class execution.



### CARING

Making a difference in people's lives. We share deep passion for our work and caring for the people we help.



### ENDURING

A proud heritage of nearly 130 years. We are here for the long term – building on our strong, enduring heritage and continuing to invest in the future to address health needs where they are greatest.

## WHO SHOULD COMPLY WITH OUR CODE

Our Code applies globally to all AbbVie employees. We expect our suppliers, business partners and other third parties with whom we conduct business to meet the same high standards that we set for ourselves and adhere to behavior consistent with the spirit of the Code and to all applicable laws and regulations when working on behalf of AbbVie.

## LEADERS AS ROLE MODELS

If you lead others, you set the tone for our culture of integrity. Encourage compliance with our Code. Listen to employee concerns. Do not tolerate inappropriate behavior or unethical or illegal activities where you work or in any other area of the company. Your commitment to our Code and your positive actions contribute to AbbVie's performance, but more importantly, to protecting our reputation.

## WE MAKE GOOD DECISIONS

**OUR CODE CANNOT TELL YOU WHAT TO DO IN EVERY SITUATION.** In most circumstances, if you abide by our policies and procedures and the law, your decision is probably the right one. Use your best judgment. Be honest and fair. If the right choice is not clear, consult your manager, the [Office of Ethics and Compliance](#), our [Legal Department](#) or another one of our [Contacts](#).



### MAKING A DIFFERENCE

At a meeting, a coworker and I hear a consultant say something that seems inappropriate. Discussing it later, we both agree that it was not in good taste, but my coworker doesn't think it broke any rules or the law. I respect the consultant and don't want her to get in trouble, but I tell my manager what happened because I feel it is best for the company.



## MAKE THE RIGHT DECISION

### ASK YOURSELF...



Is it lawful?



Does it comply with our policies and procedures?



Does it align with accepted industry practice?



Does it show respect for our culture of integrity?



Does it support our performance and our goals?



Would I be comfortable if it was publicized?

If **YES** to all: Do it. Your decision is likely the right one.

If **NO** to any: Don't do it. It may put a patient, you, someone else or our company at risk.

If **NOT SURE** about any: Discuss it with a manager, the [Office of Ethics and Compliance](#), our [Legal Department](#) or one of our [Contacts](#).

# WE SPEAK UP

OUR CULTURE ENCOURAGES OPEN COMMUNICATION AND RESPECTFUL DISCUSSION. It is everyone's responsibility to speak up! This is how we resolve problems and enhance our performance.

|   |  |  |
|---|--|--|
| <p>If you... <b>want to know</b> about a compliance issue, our policies or procedures</p> <hr/> <p><b>SPEAK UP!</b></p> | <p>If you... <b>see</b> inappropriate behavior, a Code violation or illegal activity</p> <hr/> <p><b>SPEAK UP!</b></p> | <p>If you... <b>suspect</b> inappropriate behavior, a Code violation or illegal activity</p> <hr/> <p><b>SPEAK UP!</b></p> |
|---|--|--|

Don't wait for someone else to speak up. Sometimes, a simple, "please don't do that" to a coworker may be enough to correct behavior. If it doesn't work, raise the concern yourself. Looking the other way when it comes to unlawful or unethical conduct puts us all at risk.

## MAKING A REPORT

A brief conversation with a manager may easily remedy many issues. There are other ways to report your concerns, too. See our [Contacts](#) page for a list of resources to assist you, including our [Ethics and Compliance Helpline](#), a confidential option available for sharing your concerns 24 hours a day, 7 days a week. When you report an issue, we will promptly investigate it and take corrective action when necessary. You may report anonymously where permitted by law. Never be afraid to share a concern.

## WE DO NOT RETALIATE

Our no-retaliation policy aligns with our commitment to integrity. Express and report your concerns freely. We will not tolerate retaliation against you for making a good faith report. Anyone discovered to be involved in retaliation is subject to corrective action, up to and including termination of employment.



## THIS IS OUR WAY

We respect and investigate all reports made in good faith. This means you are telling us what you believe is true. You don't have to know all the facts to make a report. If you honestly suspect inappropriate or unlawful conduct, report it. This helps preserve our reputation and the trust that others place in us.



**There are many ways for you to raise issues and concerns. Contact ...**

Your manager

[Human Resources](#)

[Office of Ethics and Compliance](#)

[Legal Department](#)

[Ethics and Compliance Helpline](#)

See our [Contacts](#) page for a complete list of AbbVie reporting resources.

## COOPERATING WITH INVESTIGATIONS

When an investigation into alleged misconduct is underway, we cooperate and respond promptly to requests for information. This includes providing accurate documents or records related to an investigation. Share what you know honestly and completely.

## CONSEQUENCES FOR VIOLATIONS

Anyone discovered to be involved in inappropriate conduct or in violation of our Code, our policies, our procedures and/or applicable laws or regulations, is subject to corrective action, up to and including termination of employment.

## WE ARE RESPECTFUL

### OUR WORKPLACE ENCOURAGES COLLABORATION AND INCLUSION.

Sharing and valuing a wide range of ideas and viewpoints broadens our perspectives, helping inspire innovation and achievement of our goals.

### WE VALUE DIVERSITY AND INCLUSION

We aspire to offer a vibrant, inclusive workplace that engages our broad diversity of people. We embrace differences and promote equal opportunity in our employment practices. We do not discriminate on the basis of race, color, religion, national origin, age, sex, physical or mental disability, medical condition (including pregnancy), genetic information, gender identity or expression, sexual orientation, marital status, protected veteran status or any other characteristics protected by law.



### MAKING A DIFFERENCE

I am currently interviewing candidates to join my team. Although I don't work in a country that has anti-discrimination laws, I plan to honor AbbVie's commitment to equal employment opportunity and offer the position to the most qualified candidate based on knowledge, skills and ability.

### WE PROMOTE RESPECT

People make AbbVie a success. We promote a harassment-free workplace where individuals are treated with respect and dignity. We do not tolerate any improper conduct – verbal, visual or physical – that is unwelcome or directed at someone based on his or her legally protected characteristics. This includes conduct that interferes with someone's work or creates an intimidating, hostile or offensive work environment.



### THIS IS OUR WAY

Examples of inappropriate conduct may include...

- Intimidating, demeaning or offensive remarks, emails, photos or other printed materials
- Racial or religious slurs or epithets
- Jokes, pictures, comments or words with derogatory or sexual content
- Unwanted physical contact



### POLICY PERSPECTIVE

See our policy online,  
[AbbVie Anti-Harassment/Discrimination](#)



# WE PROTECT OUR EMPLOYEES AND OUR ENVIRONMENT

**WE ARE COMMITTED TO PROTECTING THE ENVIRONMENT AND THE HEALTH AND SAFETY OF OUR EMPLOYEES, CONTRACTORS AND COMMUNITIES.** Our Environment, Health and Safety programs aim to provide a safe and healthy workplace for employees, minimize injuries and illnesses, reduce AbbVie's environmental footprint and maintain regulatory compliance.

Do your part to work in a safe and environmentally sustainable manner. Take responsibility for maintaining an incident-free workplace, and report any concerns to your manager or site Environment, Health and Safety representative.



## MAKING A DIFFERENCE

While installing a new piece of equipment, I notice a very sharp edge at an employee's work station. As an AbbVie engineer, I take pro-active steps to eliminate the sharp edge so that no employee will be subject to accidental injury.



### POLICY PERSPECTIVE

See our policies online, [AbbVie Environment, Health and Safety](#) and [AbbVie Energy](#)

## WE DRIVE SAFELY

We recognize the need to avoid distractions while driving vehicles in our working roles. If you drive as part of your job at AbbVie, you are prohibited from using hand-held devices while operating a vehicle. Hands-free devices may be used to perform certain tasks, but only if you can do so safely and it is consistent with local law.



### POLICY PERSPECTIVE

See our policy online, [AbbVie Global Distracted Driving Standard](#)



## WE DON'T TOLERATE SUBSTANCE ABUSE

The use of illegal drugs and alcohol misuse by employees is inconsistent with the commitment of AbbVie to provide a safe, healthy, secure and productive work environment. Performing your duties while impaired is irresponsible and could endanger your safety and the safety of others and interfere with job performance.



### POLICY PERSPECTIVE

See our policy online,  
[AbbVie Drug and Alcohol](#)

## WE DON'T TOLERATE WORKPLACE VIOLENCE

AbbVie is committed to maintaining a work environment free from intimidation, violence or threats of violence. Any employee who becomes aware of threats, threatening behavior, signs of potential violence or actual violence should report it immediately to a manager, [Human Resources](#) or [Security](#).

Consistent with applicable law, weapons are prohibited on company premises, in company vehicles, while conducting company business or at company-related meetings or functions.



### POLICY PERSPECTIVE

See our policy online,  
[Workplace Violence Prevention](#)



## WE SUPPORT EMPLOYEE PRIVACY

OUR GLOBAL PRIVACY POLICY PROTECTS PERSONAL INFORMATION ABOUT EMPLOYEES. Employees should feel secure knowing that we only use employee data for legitimate business purposes. We safeguard employee data from improper use or transfer to unauthorized sources. All third parties must abide by our commitment to employee privacy, too.



### MAKING A DIFFERENCE

A supplier's representative asks me for the home phone number of another AbbVie employee. Since I work in human resources, the supplier probably thinks I have this in my files. The representative says she had met the employee once before and they had discussed getting together socially. I tell her that I am not allowed to give out this kind of personal information.



### POLICY PERSPECTIVE

See our policy online,  
[AbbVie Global Privacy Policy](#)

## INTEGRITY IN PATIENT CARE

It is a team effort  
to create a  
healthier world.

- 26 We Are Committed to Improving Patients' Lives
- 26 We Interact Honestly with Healthcare Providers
- 28 We Ensure Patient and Customer Privacy





## WE ARE COMMITTED TO IMPROVING PATIENTS' LIVES

OUR WORK, OUR DECISIONS AND OUR BUSINESS INTERACTIONS ARE FOCUSED ON ADVANCING MEDICINE THROUGH INNOVATIVE PRODUCTS AND THERAPIES. It is at the heart of everything we do. When we direct our activities toward improving patients' lives in this way, we know we are doing the right thing.

## WE INTERACT HONESTLY WITH HEALTHCARE PROVIDERS

HEALTHCARE PROVIDERS ARE AT THE FRONT LINES OF DISEASE MANAGEMENT. We collaborate to ensure our products are appropriately prescribed and distributed to the patients who need them. Our dedication to clear communications with healthcare providers serves the best interests of patients and supports medical advancements.

We take care to ensure product information is accurate, comprehensive, relevant and up to date. We are fair and open in our dealings with healthcare providers and customers. We do not offer or give gifts or other items or services of value as a means to earn favor for our products or to sway medical judgment. We rely on product quality and healthcare outcomes to influence purchasing and prescribing practices. This reinforces the positive reputation we have earned worldwide.



### THIS IS OUR WAY

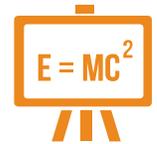
Our commitment to transparency gives us another way to inspire public trust in our company. We track and submit accurate reports of anything of value given to healthcare providers and teaching hospitals. Depending on your location, you may need to track payments, expenses and fees covering such things as ...



Meals



Travel



Educational material



Consulting and speaking engagements



Grants and charitable donations



Research



### MAKING A DIFFERENCE

I interact regularly with a research hospital and want to send a holiday gift basket to the hospital, filling it with candy for distribution to its employees. After consulting AbbVie's Office of Ethics and Compliance I am told that while it is a kind offer, I should not do it because it might appear that AbbVie is trying to influence doctors at the hospital to do business with AbbVie.

## WE ENSURE PATIENT AND CUSTOMER PRIVACY

**THE PRIVACY OF PATIENTS, HEALTHCARE PROFESSIONALS AND OUR CUSTOMERS IS PARAMOUNT.** We treat personally identifiable information of patients and customers with care and respect. Whether we collect such information verbally, in print or electronically, we use it only for legitimate business purposes and always consistent with any notice provided and consent obtained. This also applies to third-party individuals and suppliers that do business for us. We require our suppliers to meet the same standards of privacy and security protection for personally identifiable information as AbbVie provides.

**Personally identifiable information** is any information or set of information that identifies or could be reasonably used to identify an individual. A birth date, age, address, parents' names, social security number and credit card number are a few examples. You should minimize the patient and customer personally identifiable information you share, and only share with AbbVie coworkers when they are authorized to have it and need it for a legitimate business purpose.



### THIS IS OUR WAY

It is our responsibility to...

- Comply with all applicable laws and AbbVie policies to safeguard privacy of information in the countries where we operate.
- Never use or share personally identifiable information in a manner that is inconsistent with the notice provided when the information was collected or any consent obtained.
- Report any unauthorized disclosure of personally identifiable information to Global Security via our **Global Command Center Hotline at 1.847.935.5555** or your local privacy lead, our [Legal Department](#) or the [Office of Ethics and Compliance](#).



### MAKING A DIFFERENCE

An outside consultant who helps advertise and promote AbbVie's products calls to say she is assembling a presentation for a medical conference and asks me for the names of physicians who have prescribed our products, and their patients' names, so she can interview them. I know this information is private and that revealing patient data without proper permission may violate the law, so I refuse the request.



### POLICY PERSPECTIVE

See our policy online,  
[AbbVie Online Privacy](#)



## INTEGRITY IN OUR INDUSTRY

Growth and innovation require an uncompromising commitment to transparency.

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- 34 We Maintain High Standards in Research & Development
- 36 We Maintain Trustworthy Business Practices
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- 40 We Protect Company Assets
- 42 We Manage and Store Records Accurately
- 42 We Are Ethical in Gathering Business Intelligence
- 43 We Communicate With the Public Appropriately



# WE FOLLOW INDUSTRY LAWS AND REGULATIONS

WE VALUE THE LONG-STANDING TRUST WE HAVE EARNED WORLDWIDE. Patients, healthcare providers, customers and suppliers know they can rely on us because we comply with the laws, regulations and codes that govern the pharmaceutical industry and our company (e.g., European Federation of Pharmaceutical Industries and Associations [EFPIA] and International Federation of Pharmaceutical Manufacturers and Associations [IFPMA]).



## THIS IS OUR WAY

Respect for each other, our business performance and our culture includes knowing and honoring the rules and regulations that govern our industry. These include laws and regulations regarding:



Research and development



Manufacturing of our products



Promoting and selling our products



Marketing our products



Distributing our products

Because we are a public company based in the United States, we comply with certain U.S. laws wherever we operate unless a requirement outside the United States is more restrictive and does not conflict with U.S. law.

If you are in a situation outside the United States where regulations, rules or laws seem to conflict with our Code or applicable U.S. regulations, consult your manager or seek guidance from our [Legal Department](#).

# WE MAKE PRODUCT QUALITY AND SAFETY A PRIORITY

THE IMPORTANCE WE PLACE ON PRODUCT QUALITY AND SAFETY IS EMBEDDED IN OUR CULTURE. This is why patients and consumers trust our products. It is also why industry authorities and medical experts respect our company.

Our manufacturing facilities adhere to Current Good Manufacturing Practices (CGMP) standards and follow stringent quality control procedures. AbbVie suppliers are subject to these standards, too, and must maintain a Quality Management System.

Report any unfavorable, unexpected or undesirable result associated with AbbVie product use, whether or not attributable to an AbbVie product, within one business day after learning of the adverse event. Call **800.633.9110** or follow local procedures for your group or affiliate so that all appropriate individuals and government regulators are informed. Your local affiliate or department may have specific procedures for reporting safety concerns.



## MAKING A DIFFERENCE

A representative of a potential AbbVie supplier approaches me to request a commitment to a contract. The supplier is widely respected, and I feel the association would help improve AbbVie's performance. The representative says that our review/due diligence process isn't necessary because of his company's established reputation. I tell the representative that he cannot sidestep our policies and procedures and insist that these be followed so we can maintain our high standards.



### POLICY PERSPECTIVE

See our policy online, [Good Scientific Practices](#)

## WE PROMOTE PRODUCTS RESPONSIBLY

OUR ADVERTISING AND PROMOTION EFFORTS FOCUS ON CONVEYING USEFUL PRODUCT INFORMATION TO HEALTHCARE PROVIDERS, PATIENTS AND CUSTOMERS. We only promote our pharmaceutical products for uses that have been approved or authorized by appropriate government or regulatory agencies, (e.g., we don't promote in the United States a use that has been approved by the French but not the U.S. government). Our product claims are grounded in scientific evidence, accepted medical practice and government-approved labeling rules in all countries where we operate.

## WE MAINTAIN HIGH STANDARDS IN RESEARCH & DEVELOPMENT

OUR DIVERSE PORTFOLIO OF PHARMACEUTICALS IS GROUNDED IN LEADING-EDGE SCIENCE. We discover, develop and improve our products through studies and clinical trials that follow industry standards. Our shared goal of finding new ways to improve health outcomes unifies our R&D efforts.

### CLINICAL TRIALS

Our clinical trials follow stringent procedures that apply globally. Researchers and clinical investigators are qualified, objective and transparent. Clinical study participants are treated with dignity and respect. We only perform clinical trials in countries that are in compliance with international guidelines for the conduct of clinical trials and the protection of human subjects.



### POLICY PERSPECTIVE

See our policies online,  
[Clinical Research](#)



### THIS IS OUR WAY

- Rigorous policies and procedures guide how we conduct research.
- Clinical trials are reviewed by independent ethics committees.
- We obtain informed consent from participants prior to initiating a clinical trial, and protect participants from unreasonable risk.
- Study analyses and results are accurately and timely reported.
- Authorship and publication of study results follow accepted industry practice.
- We disclose any financial relationships with investigators when research is done on our behalf.

### ANIMAL WELFARE

The humane treatment of animals is essential to our approach to quality scientific discovery and drug development. We meet all applicable regulations and standards regarding care of laboratory animals. We strive to minimize pain and distress. When we work with animal models, the internationally accepted principles for the humane use of animals in research known as the 3Rs – *Reduction, Refinement, Replacement* – guides our commitment to animal welfare.



### POLICY PERSPECTIVE

[AbbVie's Commitment to Humane Care and Use of Animals](#)



### THIS IS OUR WAY

- Whenever we can, we seek alternatives to animal testing.
- We prefer to work with labs accredited by the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC).

# WE MAINTAIN TRUSTWORTHY BUSINESS PRACTICES

WE COMPLY WITH ALL APPLICABLE LAWS THAT REGULATE OUR BUSINESS. Many of these laws concern the way we promote and sell our medical products. It is never acceptable to try to influence purchasing decisions in any way that is unethical, inappropriate or illegal or creates a potential conflict of interest. We are honest, open and up-front when we interact with those who may be interested in buying or prescribing our products.



## THIS IS OUR WAY

Compliance with the law inspires trust in our culture of integrity. We abide by all laws, regulations, policies and procedures that apply to our jobs including...

- **U.S. Anti-Kickback Statute.** We don't give anything of value to induce a healthcare professional to use or recommend pharmaceutical products that are paid for or reimbursed by the government.
- **U.S. False Claims Act and similar laws in other countries.** We don't submit or cause the submission of false claims for healthcare reimbursement to the government.
- **Food, Drug and Cosmetic Act and similar laws in other countries.** We don't promote a regulated product or an indication that has not received FDA or other appropriate regulatory approval.
- **Transparency Laws.** We report certain payments to physicians and other customers, as required by transparency laws and regulations in every location where we operate.
- **U.S. Foreign Corrupt Practices Act, the United Kingdom Bribery Act and similar laws in other countries.** We do not participate in bribery or corruption and adhere to all local laws and regulations that cover bribery and corruption.

If you are in a situation outside the United States where local regulations, rules or laws seem to conflict with our Code or applicable U.S. regulations, consult your manager or get guidance from our [Legal Department](#).



### POLICY PERSPECTIVE

See the Pharmaceutical Research and Manufacturers of America (PhRMA) [Code on Interactions with Healthcare Professionals](#) and our [Global Minimum Standards for Engaging Healthcare Professionals](#)

## WE COMPLY WITH ANTI-BRIBERY AND ANTI-CORRUPTION LAWS

WE DO NOT TOLERATE IMPROPER PAYMENTS. WE UNDERSTAND THAT ACCEPTING, OFFERING OR GIVING ANYTHING OF VALUE TO INFLUENCE A BUSINESS DECISION OR GAIN AN UNFAIR BUSINESS ADVANTAGE IS IMPROPER. We also understand that improper payments received or given can have severe repercussions for the individuals involved, for AbbVie and ultimately, for our industry and the people we serve. We are careful to maintain accurate books and records to reflect all payments made and received, and we avoid even the appearance of anything improper.

We recognize that we may be responsible for improper payments made by third parties conducting business on our behalf, so we have due diligence processes in place to ensure we know who we are working with, that they have a reputation for operating honestly and with integrity and that any payments made on our behalf are appropriate.

Although common in some countries, we prohibit “facilitation” payments to public officials for taking routine governmental actions.



### POLICY PERSPECTIVE

See our policy online,  
[Anti-Bribery and Anti-Corruption](#)



### MAKING A DIFFERENCE

I am in charge of facility maintenance in my AbbVie location. I am waiting for a particular certification required by the local government. A government official asks me for a cash payment in order to expedite the certification. I know that it is unacceptable to pay a government official a fee such as this to get things done. I refuse to make the payment and I report the incident to my manager and to our Legal Department.



# WE PROTECT COMPANY ASSETS

WHETHER OUR WORK TAKES US TO AN OFFICE, A WAREHOUSE, A LABORATORY, A HOSPITAL, A HEALTHCARE FACILITY, A REMOTE LOCATION OR OUR HOME, WE CARE FOR ABBVIE'S ASSETS AS IF THEY WERE OUR OWN. These assets include information assets as well as physical, electronic and financial assets. Protecting assets from improper or careless use, destruction or disclosure is everyone's job.

## WE PROTECT CONFIDENTIAL AND PROPRIETARY INFORMATION

Information about AbbVie operations is private. We use it only to do our jobs and never share it with anyone, inside or outside of AbbVie, who is not authorized to see it. We do not upload or store confidential, proprietary or personally identifiable information to unauthorized sites such as cloud storage sites, our personal email accounts, home computers, personally obtained storage locations or insecure locations.

We are especially careful to protect proprietary information – knowledge that AbbVie owns and uses to our competitive advantage in the marketplace. This includes intellectual property such as trade secrets (for example, patents, trademarks, manufacturing processes and business methods). As AbbVie employees, we are in a position of trust and confidence and may come into contact or have access to confidential information and inventions that were developed by AbbVie employees and agents. Confidential information and inventions are more specifically defined in your AbbVie Employee Agreement.



### POLICY PERSPECTIVE

See our policy online,  
[Confidential Information](#)



### THIS IS OUR WAY

There may be times when a government agency, supplier or legal team requests us to disclose confidential information. If you receive a request of this kind, contact our [Legal Department](#) for assistance.



### MAKING A DIFFERENCE

I am an AbbVie researcher. In a casual conversation with my brother, he asks me if AbbVie is studying any new drug treatments. I know about an innovative new therapy that is currently being discussed but, as excited as I am to share AbbVie's plans, I know the information is proprietary so I decide not to share this information.

## WE PROTECT ABBVIE'S ELECTRONIC AND PHYSICAL ASSETS

Safeguarding AbbVie facilities, vehicles, furnishings, equipment, inventory, electronic devices and information systems from damage and loss is everyone's responsibility. We maintain electronic and physical assets in good working condition and never use them in a careless or wasteful manner. We keep our computers, other electronic devices, software and the passwords we use to access them, secure. Occasional personal use of AbbVie resources is permitted, as long as it doesn't interfere with your job or violate our policies.

## WE PROTECT ABBVIE'S FINANCIAL ASSETS

The integrity of our cash assets and securities, bank accounts, credit standing and financial records is essential to our success. We take great care to protect these and other financial assets and keep them secure. We manage budgets responsibly. We comply with AbbVie accounting controls, financial policies and guidelines related to sourcing and purchasing. If you have an accounting or auditing concern, speak up.



### MAKING A DIFFERENCE

As an AbbVie sales representative, I often work in remote locations. Sometimes while waiting to meet a business partner I use my company laptop to check personal email. I mistakenly click on an email attachment that causes the computer to shut down. I call my manager, who refers me to our information technology department for assistance in safely rebooting my device and preventing any potential damage.

## WE MANAGE AND STORE RECORDS ACCURATELY

WE ENSURE THE INTEGRITY OF OUR BUSINESS TRANSACTIONS BY KEEPING DOCUMENTS AND RECORDS ORGANIZED AND MAKING SURE ENTRIES ARE ACCURATE, COMPLETE AND THOROUGH. We store records securely and maintain them in accordance with our Records Management Program. When our records are subject to a Legal Hold Order, we are careful to keep records intact. Contact our [Legal Department](#) to learn more about Legal Hold Orders.



### POLICY PERSPECTIVE

See our policy online, [Records Management](#)



### MAKING A DIFFERENCE

A coworker just completed a sale at the beginning of AbbVie's second quarter. She is wondering if recording an earlier closing date for the transaction is acceptable, because she wants to meet a sales target. I remind her that making a false entry in our books is not only dishonest, it may be unlawful, and she should not do it.

## WE ARE ETHICAL IN GATHERING BUSINESS INTELLIGENCE

COLLECTING AND ANALYZING INFORMATION CAN HELP US GROW, BUT WE ARE CAREFUL TO GATHER AND USE INFORMATION LEGALLY AND APPROPRIATELY. Just as we do not reveal our confidential information or trade secrets, we do not use or share the confidential information or trade secrets of others.



### THIS IS OUR WAY

We do not ask for or use confidential or proprietary information obtained through an employee's previous job and we do not reveal confidential information learned in a previous job or trade secrets of others.

## WE COMMUNICATE WITH THE PUBLIC APPROPRIATELY

IT IS A PRIVILEGE TO SHARE THE PRIDE OF OUR ACCOMPLISHMENTS WITH THE WORLD. WHEN WE SHARE INFORMATION, THE PUBLIC EXPECTS US TO BE CONSISTENT AND ACCURATE. To this end, refer all media inquiries to Public Affairs. Get approval from Public Affairs before you speak or write on behalf of the company. Consult with your manager before writing an article for a professional journal or accepting a speaking engagement on behalf of the company.



### POLICY PERSPECTIVE

See our policy online, [External Communications](#)



### MAKING A DIFFERENCE

I work in the AbbVie accounting department and have a strong opinion about a new ruling from the U.S. Food and Drug Administration. I want to use my personal blog to communicate my thoughts and am careful to show that my thoughts are my own and do not represent those of AbbVie. I clearly state this on my blog.



## INTEGRITY IN THE MARKETPLACE

Long-term business relationships depend on honesty and transparency.

- 46 We Avoid Conflicts of Interest
- 48 We Follow Antitrust Laws
- 48 We Comply With Insider Trading Laws
- 50 We Comply With Import/Export Laws
- 51 We Are Alert for Payments From Suspicious Sources
- 52 We Treat Suppliers Fairly
- 53 We Cooperate With the Government



## WE AVOID CONFLICTS OF INTEREST

OUR DECISIONS ARE BASED ON WHAT IS BEST FOR ABBVIE AND THE WELFARE OF PATIENTS RATHER THAN ANY PERSONAL ADVANTAGE.

Allowing a competing interest to interfere with good decision making can put our reputation for honesty and fairness at risk. Don't let your judgment be swayed by a conflict of interest.

A conflict of interest may arise in many different ways. Engaging in a close, personal relationship with someone who is employed by an AbbVie supplier, investing in a company that competes with AbbVie, conducting business on behalf of AbbVie with a company that a family member owns, or providing consulting services to another pharmaceutical company – these types of circumstances may present a conflict.

### A conflict of interest can exist, for example, if you...

- Work for an AbbVie competitor, supplier or business partner
- Have an ownership interest in a business that sells goods or services to AbbVie
- Hire – or recommend that AbbVie hire – a relative or friend
- Invest in a company that supplies products or services to AbbVie
- Have a family member who does, or wants to do, business with AbbVie
- Accept a gift, payment or favor from a business partner
- Offer a gift, payment or favor to a business partner
- Accept a business opportunity for yourself that was intended to benefit AbbVie
- Serve on the board of a company that does business with AbbVie

Let your manager, [Human Resources](#) or the [Office of Ethics and Compliance](#) know about any situation that you believe may be a conflict of interest.



MAKING A DIFFERENCE

A supplier who I have worked with for many years, approaches me to ask if I would consider doing some consulting work for his company. He assures me that the work is totally unrelated to the work I do for AbbVie. I thank him for the offer, but decline. Even if the work is unrelated, I know how this could look to others and that I need to avoid even the appearance of an improper relationship.



## WE FOLLOW ANTITRUST LAWS

**WE SUPPORT FREE AND HONEST COMPETITION.** The fair pricing of our products is essential to our commitment to improving health worldwide. This is why we never engage in activities that restrain free trade – such as price fixing, bid rigging or other arrangements that violate antitrust laws. We never discuss pricing, customers or sales agreements with competitors, and are careful to avoid any activity that gives the appearance of restricting trade.



### POLICY PERSPECTIVE

See our policy online,  
[Compliance With Antitrust Laws](#)



### MAKING A DIFFERENCE

During a break at an industry conference, I join a couple of AbbVie competitors and some vendors to chat over coffee. When someone begins discussing pricing and territories, I am aware that participating in this conversation could put AbbVie at risk, so I immediately excuse myself from the group and leave the room. I tell our Legal Department what happened as soon as the conference is over.

## WE COMPLY WITH INSIDER TRADING LAWS

**IN THE COURSE OF OUR JOBS, WE MAY HEAR OR KNOW ABOUT A COMPANY'S BUSINESS ACTIVITIES OR PLANS THAT ARE NOT YET PUBLICIZED.** Information that has not been made public, but if known, may persuade a reasonable investor to buy, sell or hold a company's securities is called "inside" or "nonpublic" information. Never use this information – whether it is about AbbVie or any other company -- to conduct a trade. Never "tip" someone else on what you know so that they may trade. Insider trading and tipping are illegal.

**There are many kinds of material, nonpublic information.**  
It could be anything you know about current, new or pending...



**Mergers or acquisitions**



**Changes in management**



**Financial results or forecasts**



**Market strategies**



**Legal actions**



**Contracts**



**Clinical trial or other scientific data**

Even after inside information is made public, you are not allowed to use the information to trade in securities until a certain amount of time has elapsed. Contact our Legal Department if you have any questions about a transaction you are considering.



### POLICY PERSPECTIVE

See our policy online,  
[Insider Trading in Securities](#)



### MAKING A DIFFERENCE

My neighbor works for one of AbbVie's collaboration partners and tells me that important clinical trial data for a compound being developed jointly by her employer and AbbVie will be released next week. The data suggests that the compound will be highly successful commercially. I think about purchasing the collaboration partner's stock and telling my brother, but realize that what I have heard about both companies could be considered material, nonpublic information. I keep the information confidential and do not trade in either company's stock so as not to violate our Code or the law.



## WE COMPLY WITH IMPORT/EXPORT LAWS

WE COMPLY WITH ALL APPLICABLE LAWS, REGULATIONS, SANCTIONS AND RESTRICTIONS THAT RELATE TO THE IMPORT AND EXPORT OF OUR PRODUCTS AND SERVICES. We also comply with U.S. anti-boycott laws which prohibit or penalize cooperation with international boycotts that the U.S. government does not endorse. Make sure you know and comply with any trade compliance laws and regulations associated with the countries in which you do business. Contact our [Legal Department](#) if you have any questions or concerns.



### MAKING A DIFFERENCE

A distributor informs me that he is planning to sell products that he purchases from us into a country that is subject to comprehensive trade sanctions imposed by the U.S. government. When I try to get more details, he tells me not to worry because the product will be delivered to the distributor in a neighboring non-sanctioned country, and he will take full responsibility for re-exporting the goods into the sanctioned country. I stop all shipments to the distributor and alert our Legal Department, as I believe this is inconsistent with our Code and applicable trade laws.

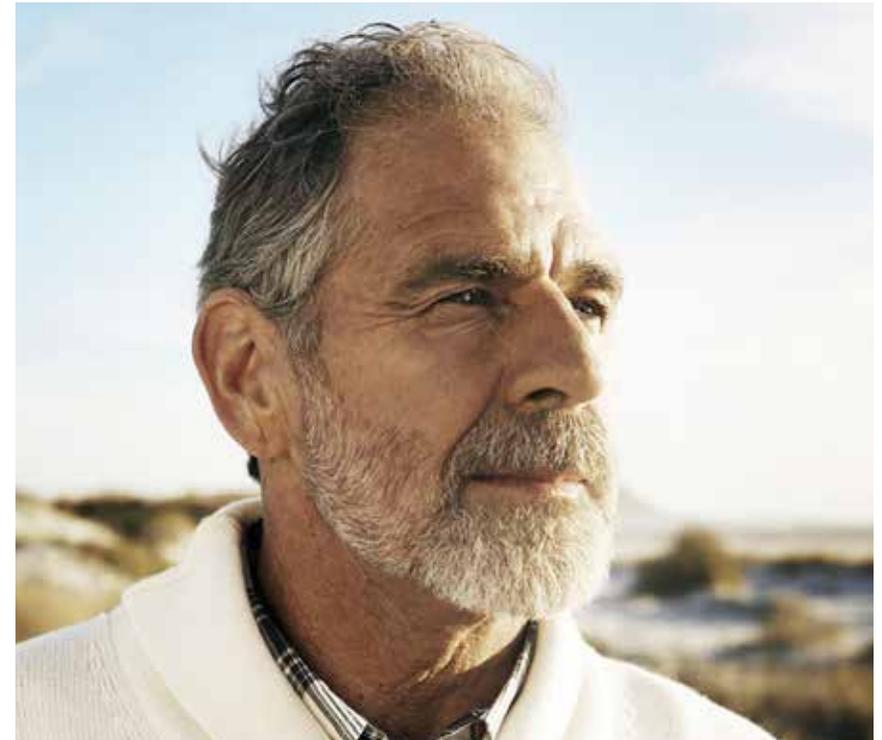
## WE ARE ALERT FOR PAYMENTS FROM SUSPICIOUS SOURCES

PURCHASES AND PAYMENTS MADE IN UNUSUAL WAYS MAY SIGNAL ILLEGAL ACTIVITY. Watch out for payments made to AbbVie or on our behalf that come from an unknown source, are all-cash payments or are payments made through a personal bank account or financial institution with no relation to the customer or business partner. Report any such transaction that you feel is suspicious to our [Legal Department](#) or [Finance Department](#).



### POLICY PERSPECTIVE

See our policy online,  
[Anti-Money Laundering Law](#)



## WE TREAT SUPPLIERS FAIRLY

OUR COLLABORATIVE ASSOCIATION WITH SUPPLIERS IS BASED ON MUTUAL TRUST, FAIRNESS AND PRIDE IN CONTRIBUTING TO EXCELLENCE IN PATIENT CARE. We are honest and open when we interact with suppliers. We support competitive business practices and make decisions objectively without regard to personal or financial gain or personal relationships.



### MAKING A DIFFERENCE

My department is getting ready to select a supplier for some equipment that AbbVie will need to purchase on a regular basis. I tell a prospective vendor that our policy requires three bids. She promises that her company will offer us the lowest price so there is no need to request other bids. I inform her that she must follow our bid process.



### POLICY PERSPECTIVE

See our policies online, [Purchasing Code of Conduct](#) and [Purchase Authority](#)

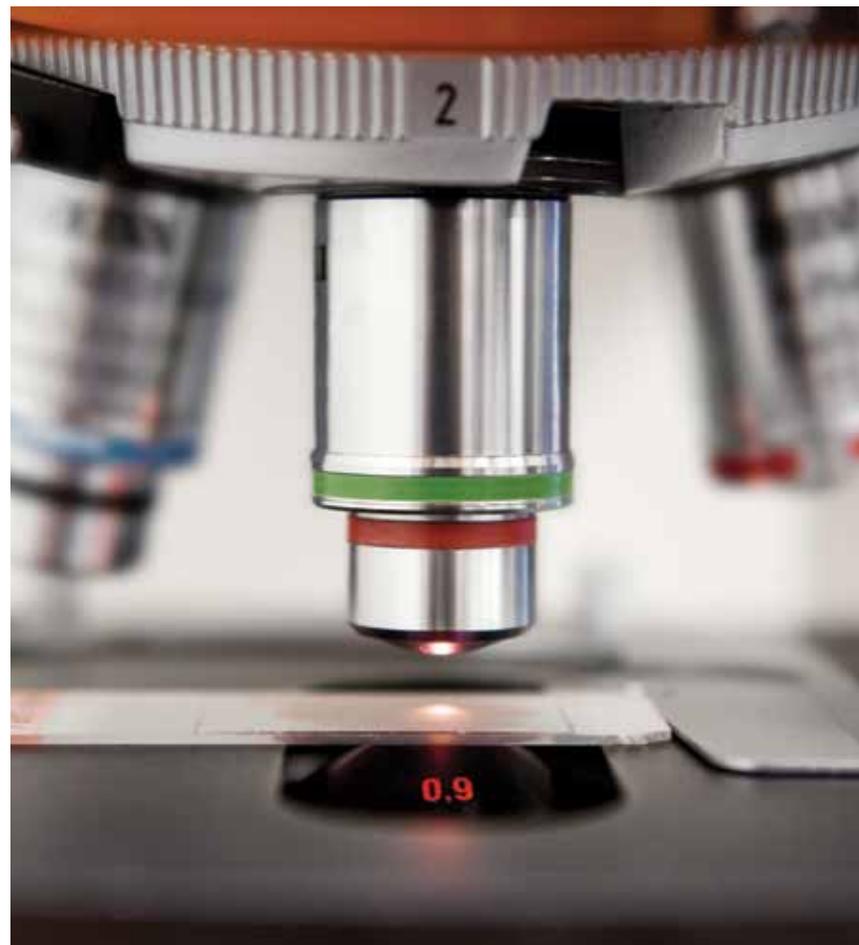


### THIS IS OUR WAY

All AbbVie suppliers must abide by our Supplier Code of Conduct and the law. If you observe or suspect supplier misconduct, take responsibility by reporting it to [AbbVie Purchasing and Supplier Management](#) or to the AbbVie [Office of Ethics and Compliance](#), either directly or via the Ethics and Compliance Helpline, **1.800.254.0462**.

## WE COOPERATE WITH THE GOVERNMENT

OUR INTERACTIONS WITH GOVERNMENT AGENCIES AND OFFICIALS ARE HONEST AND FORTHRIGHT. We meet all requirements for accurate, timely reporting and documentation that may be required and cooperate with inspections and investigations. When asked for information or records or to verify data that we have submitted to them, we are truthful and transparent. If you receive a request, you should contact our [Legal Department](#).



## INTEGRITY IN THE COMMUNITY

Business performance  
thrives when it embraces  
social responsibility.

56 We Are Good Global Citizens

58 We Help Protect the Planet



## WE ARE GOOD GLOBAL CITIZENS

**OUR PASSION FOR SOLVING THE WORLD'S TOUGHEST HEALTHCARE CHALLENGES CARRIES OVER TO FACING THE NEEDS OF UNDERSERVED COMMUNITIES.** It is our honor to be a leader in corporate citizenship initiatives worldwide. We partner with communities – on both a global and local basis – to bring hope and opportunity to people in areas such as literacy, education, employment, healthcare and more. We encourage involvement in our social programs, but we never pressure volunteer activity.

### WE SUPPORT HUMAN RIGHTS

We show respect for human dignity and the rights of every individual by supporting the principles set forth in the Universal Declaration of Human Rights, created by the United Nations. We comply with the employment laws of the countries in which we do business and expect our suppliers and business partners to do the same.



### THIS IS OUR WAY

AbbVie does not tolerate human rights abuses. We comply with laws and practices that prohibit:

- Child labor
- Forced, bonded or indentured labor
- Involuntary prison labor
- Human trafficking
- Unfair wages and benefits

## INDIVIDUALLY, WE MAKE A DIFFERENCE

We celebrate involvement in the communities where we live and work, but decisions to participate in charitable or political activities are personal ones. Unless you are notified otherwise, you may volunteer, participate or make contributions to charitable organizations or to political candidates, campaigns or parties as you wish, but always use your own name, your own funds and your own resources – not AbbVie's – unless you receive approval in advance.



### MAKING A DIFFERENCE

During AbbVie's annual volunteering event, our Week of Possibilities, the company encourages everyone to participate in various nonprofit organizations and help their local communities. I am so glad I chose to do this! I really felt like I made a difference in the world. I know it is my personal decision to volunteer and am proud to work for a company that supports involvement in these kinds of positive outreach programs.



# WE HELP PROTECT THE PLANET

OUR ENVIRONMENTAL STEWARDSHIP INITIATIVES HELP PROTECT THE PLANET WHILE IMPROVING EFFICIENCY, REDUCING COSTS AND PRESERVING OUR ABILITY TO DO BUSINESS IN THE FUTURE. AbbVie works diligently to ensure environmental stewardship across our value chain, from the sourcing of raw materials, to the manufacture and distribution of our products. Promptly report any situation or business practice that poses a safety, health or environmental concern to your manager or EHS Site Representative.



## THIS IS OUR WAY

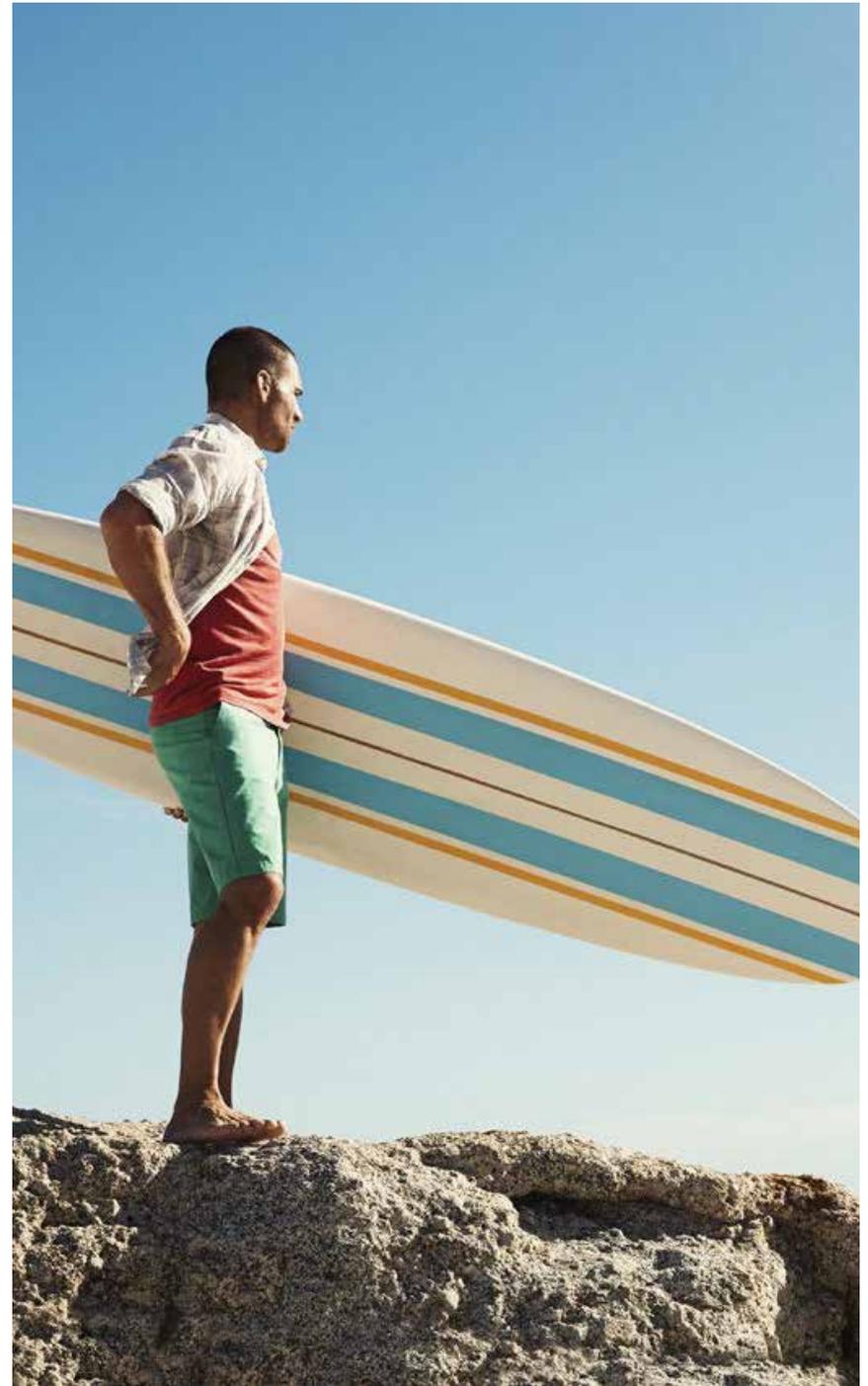
To help protect the planet we are dedicated to the following practices...

- Reducing energy use, water use, waste generation and use of other natural resources
- Supporting projects that generate energy from renewable sources
- Reducing the environmental impact of our operations and mitigating environmental risks
- Supporting waste reduction and recycling efforts
- Complying with all EHS regulations and internal EHS standards
- Expecting suppliers to comply with all applicable EHS regulations



### POLICY PERSPECTIVE

See our policies online, [AbbVie Environment, Health and Safety](#) and [AbbVie Energy](#)



## WAIVERS

The Audit Committee of the AbbVie Board of Directors may authorize a waiver of our Code for officers. The Chief Executive Officer is the only individual who can authorize a waiver for any other AbbVie employees. We publicly disclose waivers as required by law.



# CONTACTS AND HELPLINE

There are many ways to contact us when you have a question or concern. We encourage employees to use the method that is most convenient. This list is your guide.

| RESOURCE  | CONTACT ABOUT               | CONTACT INFORMATION  |
|---|-----------------------------|--|
| <b>Ethics and Compliance Helpline</b><br><br>Share concerns confidentially and anonymously, where permitted by law, 24 hours a day, 7 days a week | <b>Any issue or concern</b> | U.S., Puerto Rico and Canada: <b>1-800-254-0462</b><br><br>All other countries:<br>Contact the AT&T USADirect operator, then dial or ask operator to dial <b>1-800-254-0462</b> .<br><br>Go to <a href="http://www.usa.att.com/traveler/index.jsp">www.usa.att.com/traveler/index.jsp</a> to find the number for AT&T USADirect in your country. |

|  |                             |   |
|--|-----------------------------|---|
| <b>Vice President, Chief Ethics and Compliance Officer</b> | <b>Any issue or concern</b> | Email: <a href="mailto:oecc@abbvie.com">oecc@abbvie.com</a><br><br>Mail: Vice President Chief Ethics and Compliance Officer AbbVie, Department V36X, 1 North Waukegan Road, North Chicago, IL 60064 U.S.A.<br><br>Mark envelopes: <i>"Confidential – To be opened by the Vice President, Chief Ethics and Compliance Officer only."</i> |
|--|-----------------------------|---|

| RESOURCE               | CONTACT ABOUT                        | CONTACT INFORMATION   |
|------------------------|--------------------------------------|---|
| <b>Global Security</b> | <b>Any security issue or concern</b> | Command Center Hotline: <b>1-847-935-5555</b><br><br>Affiliates: <b>+1-847-935-5555</b>   |
| <b>Human Resources</b> | <b>Any HR issue or concern</b>       | <a href="https://abbviehr.abbvienet.com/GL-EN/Pages/Global_HRCentral_Help_All.aspx">https://abbviehr.abbvienet.com/GL-EN/Pages/Global_HRCentral_Help_All.aspx</a> |
| <b>Legal</b>           | <b>Any legal issue or concern</b>    | <a href="mailto:legalcodecontacts@abbvie.com">legalcodecontacts@abbvie.com</a>  |

|   |                                   |  |
|---|-----------------------------------|--|
| <b>Operations:</b><br>• Environment, Health and Safety<br><br>• Purchasing and Supplier Management<br><br>• Quality | <b>Any issue or concern</b>       | <a href="mailto:operationsinformation@abbvie.com">operationsinformation@abbvie.com</a> |
| <b>Public Affairs</b>   | <b>Any media issue or concern</b> | <a href="mailto:PARreviews@abbvie.com">PARreviews@abbvie.com</a>                       |



# PLEDGE TO THE CODE

I acknowledge that I have received, read and understand the AbbVie Code of Business Conduct and agree to its terms, including those of the policies, procedures and Employee Agreement referenced in it, except where applicable laws otherwise apply. I promise to use it as a guide to acceptable behavior and recognize that making ethical choices in my work and complying with applicable laws contributes to AbbVie’s culture of integrity.

I also recognize that I have a responsibility to report any known or potential violations of the Code, AbbVie’s policies or procedures, or the law, to the Office of Ethics and Compliance or the Ethics and Compliance Helpline, except where laws or regulations specify otherwise. Consequences for violations may involve corrective action, up to and including termination of employment.

AbbVie does not tolerate retaliation against anyone for making a good faith report.

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SIGNATURE

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PRINTED NAME

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UPI NUMBER

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RECEIVED BY

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