

# AbbVie Supplier Code of Conduct

Effective January 2022

January 2022

At AbbVie, the patient is at the center of everything we do. We draw on our expertise in some of the most difficult-to-treat diseases and our understanding of the patient journey to identify opportunities to create better outcomes. We create the products and technologies that drive the advancement of aesthetic medicine.

Our commitment to patients extends to every aspect of our work. We view our suppliers as partners in delivering on our commitment to having a remarkable impact on patients' lives and expect that they will act accordingly.

And, just as we hold ourselves to the highest standards of ethics and compliance, we expect the same from each of our suppliers. In fact, we pride ourselves on the strong relationships we build with suppliers and our shared focus on ethics, compliance, fair practices, integrity, safety, sustainability, and quality.

By signing the AbbVie Supplier Code of Conduct, you agree to follow each of its principles, guidelines, and expectations.

Thank you for your commitment to this important work.

Regards,

A handwritten signature in black ink, appearing to read 'Azita', written in a cursive style.

Azita Saleki-Gerhardt, Ph.D.  
Executive Vice President, Operations

## **Preface**

AbbVie's suppliers are an integral part of the overall success of AbbVie. Each day, AbbVie and its suppliers make decisions that impact AbbVie's ability to provide quality health care products to its customers.

The AbbVie Supplier Code of Conduct documents the principles, guidelines, and expectations for establishing and maintaining a business relationship with AbbVie. AbbVie works within pharmaceutical and medical device standards set by federal, state, and industry regulations and is committed to having business relationships with suppliers who share AbbVie's dedication to providing quality products and conducting business in a legal and ethical manner. Because our suppliers are an extension of our business, we have the same expectations for them.

AbbVie is aware of cultural differences and challenges associated with interpreting and applying these principles globally. While AbbVie believes these principles are universal, we understand that the methods for meeting these expectations may be different but must be consistent with the laws, values and cultural expectations of the different societies of the world.

It is the responsibility of all AbbVie suppliers to maintain a Quality Management System that assures consistent conformance of their products and services to specified requirements. AbbVie suppliers are fully responsible for the quality of their products/services and the safety and security of their supply chain.

All AbbVie suppliers are expected to understand and comply with the principles, guidelines, and expectations set forth in this AbbVie Supplier Code of Conduct. Suppliers are strongly encouraged to contact an AbbVie procurement representative with any questions. Suppliers are also strongly encouraged to contact AbbVie Procurement and Supplier Management whenever there are questions relating to the appropriateness of any activity. AbbVie's Procurement and Supplier Management employees can provide an overview and further guidance on applicable AbbVie policies.

AbbVie reserves the right to verify a supplier's compliance with this AbbVie Supplier Code of Conduct. If AbbVie becomes aware of any actions or conditions not in compliance with this AbbVie Supplier Code of Conduct, AbbVie reserves the right to seek corrective action.

AbbVie has established a program to monitor Supplier Social Responsibility which includes surveying and auditing supplier adherence to the AbbVie Supplier Code of Conduct. If you require additional information regarding this program, please contact [SupplierSustainability@abbvie.com](mailto:SupplierSustainability@abbvie.com).

## Ethics

Suppliers shall conduct their business in an ethical manner and act with integrity. AbbVie expects suppliers to comply with all legal and regulatory requirements regarding ethics including:

### 1. Conflict of Interest

A conflict of interest exists whenever there is a competing interest that may interfere with our ability to make an objective decision and act in the best interest of AbbVie. AbbVie, along with its suppliers, is expected to use good judgment and to avoid situations that can lead even to the appearance of a conflict that may undermine the trust that others place in AbbVie.

Suppliers that do business with AbbVie shall not have any competing interest that may interfere with their ability to make objective decisions to act in the best interest of AbbVie. Good judgment is expected as well as avoiding the appearance of a conflict of interest.

All suppliers shall notify AbbVie immediately in the event of a potential or actual conflict of interest.

### 2. Business Integrity and Fair Competition

Suppliers shall conduct business competitively and in full compliance with all applicable laws, codes and regulations. Suppliers shall not pay or accept bribes or participate in any other illegal inducements in business or government relationships. Suppliers shall employ fair business practices including accurate and truthful advertising.

Suppliers shall be informed of the applicable provisions of the AbbVie Code of Business Conduct, including the following concepts related to interactions with AbbVie employees:

- Employees shall deal with all suppliers, customers, and all other persons doing business with AbbVie in a completely fair and objective manner without favor or preference based on personal financial considerations or personal relationships.
- Employees shall not accept or provide (directly or indirectly) gifts, prejudicial discounts, payments, fees, loans, entertainment, favors or services from any person or firm, which may influence or give the appearance of influencing purchasing decisions.
- No employee shall do business on behalf of AbbVie with a close relative or own any financial interest in a supplier's business where the AbbVie employee has the appearance or ability to impact the supplier's relationship with AbbVie. Such relationships must be disclosed per AbbVie policies.
- No employee shall grant permission for use of AbbVie's name and/or logo without permission from AbbVie Public Affairs.

AbbVie contract workers and agents (for example, consultants, contract sales forces, speakers, distributors, clinical investigators, etc.) must also comply with the applicable provisions of the AbbVie Code of Business Conduct.

AbbVie employees and suppliers are expected to report violations or possible violations of the AbbVie

Supplier Code of Conduct to AbbVie Procurement and Supplier Management or to the AbbVie Office of Ethics and Compliance, either directly or via the Ethics and Compliance Hotline (1-800-254-0462).

AbbVie will promptly investigate reported violations of the AbbVie Supplier Code of Conduct and expect employees and suppliers to cooperate in the investigation. If corrective action is required, AbbVie will outline steps to address the issue.

### 3. Identification of Concerns

Suppliers shall be encouraged to report concerns or illegal activities in their relationship with AbbVie without threat of reprisal, intimidation, or harassment. AbbVie will review the concerns and respond to them in a timely manner.

### 4. Animal Welfare

Using animals in any testing or process should only occur after alternate methods have been fully explored and rejected. Animals shall be treated humanely, minimizing pain and stress. Animal testing should be performed only after consideration has been given to non-animal-based test methods, reducing the numbers of animals used, or refining procedures to minimize distress in animals being tested. Alternatives should be used when scientifically valid and acceptable to regulators.

Contract laboratories and collaborating laboratories must be accredited by the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC), and/or their laboratory animal care and use program must be assessed by AbbVie veterinary staff and approved by AbbVie's Animal Welfare Officer prior to placement of work and thereafter on a periodic basis.

### 5. Treatment of Confidential Information

Suppliers shall not use or disclose AbbVie confidential information other than with the express prior written consent of, and for the benefit of, AbbVie. In particular, suppliers shall not exchange or otherwise disclose AbbVie confidential information with any competitor or other supplier. Any information or data regarding AbbVie operations shall always be treated as strictly confidential unless that information is in the public domain. Confidential information includes, but is not limited to:

- Purchase material specifications and conditions
- Requests for quotation
- Cost sheets
- Profit information
- Asset information
- Names of suppliers
- Pricing
- Purchase strategies
- Contact details
- R&D data

- Marketing and/or sales plans
- Financial/sales/marketing information
- Operating processes/formulas and other know-how which are AbbVie property and have not yet been disclosed to the general public
- AbbVie Intellectual Property (IP)
- Computer software programs
- Personal information about employees, officers, and directors
- Wage and salary scales
- The AbbVie name or logo

AbbVie shall require that suppliers confirm these obligations by entering into confidentiality agreements with regard to any of the previously listed confidential information and to ensure that company, worker and patient privacy rights are protected.

## 6. Data Privacy and Protection

Any personal data processed by Supplier as shall be in compliance with all applicable laws and the applicable agreement between AbbVie and Supplier based on the data classification assessment of the personal data processed by Supplier.

Supplier shall provide full and prompt cooperation with AbbVie with respect to the processing of personal data, including but not limited to:

- providing sufficient information for data classification assessments
- completing any requested third-party supplier privacy and/or security questionnaires and assessments
- implementing any additional measures for the cross-border transfer of personal data or the completion of necessary cross border transfer impact assessments

Supplier shall maintain a documented security program that has reasonable administrative, technical, and physical safeguards that are commensurate with the laws and industry standards relevant to Supplier's business activities. Supplier shall protect personal data as required in by AbbVie's data security requirements in the agreement between AbbVie and Supplier.

## 7. Sales Techniques

Suppliers are expected to interact with AbbVie in an open and honest manner. The following sales techniques are strictly prohibited:

- Backdoor selling – circumventing the proper AbbVie channels to convince an individual to purchase a specific product or service.
- Inaccurate lead time commitments – knowingly providing unattainable lead time commitments to AbbVie in an effort to secure business.
- Over-committing capacity – making commitments to provide a product or service without having the

capacity to meet the commitment.

- Request for competitor information – asking for information regarding a competitor’s product, pricing, terms, distribution or other segment of their business.
- Offering gifts in excess of nominal value.
- Providing pricing structures that are less favorable to AbbVie if the supplier is the single or sole source for the goods or services provided.
- Requesting AbbVie to accept a proposal after the closing date.

## 8. Trusted Trader Programs

Trusted Trader programs are voluntary programs fostering cooperative partnerships between governments and businesses with the goal of securing the global supply chain and facilitating legitimate, low-risk trade. AbbVie participates in several programs offered by Customs Agencies, including the U.S. Customs Trade Partnership Against Terrorism (CTPAT) program, Canada’s Partners in Protection (PiP) and EU Authorized Economic Operator (AEO) programs. These programs are designed to extend varying levels of benefits to participants depending on the maturity of their supply chain security versus the requirements. This results in the development of a cooperative relationship between government and business that strengthens local, regional, and global security throughout the supply chain.

To comply with Trusted Trader program requirements, AbbVie validates our suppliers’ policies and practices to ensure the highest levels of security standards are maintained. As an example, all strategic suppliers who ship products to AbbVie U.S. locations will be requested to complete an assessment. The result of which will be a signed memorandum of understanding or a request for the completion of corrective actions.

## 9. Supplier Visitation Process

Suppliers have limited access to AbbVie facilities. The following procedures are to be followed by all AbbVie suppliers when being granted access to AbbVie facilities:

- Suppliers should be properly registered
  - For global sites outside of Lake County, all suppliers are required to register with the receptionist or site security for access to the facility.
  - For Lake County, register via the visitor registration site
    - North Chicago, ABV1, J-Buildings <http://eadvanceabv.oneabbott.com/Disclaimer.aspx>
    - Abbott Park (<https://abbottparkvisitor.abbott.com/>)
  - Access badge
- Suppliers/visitors will be issued a temporary badge that will permit them on site but will not provide access to buildings, restricted areas, or gates. The supplier/visitor must be escorted by the supplier/visitor sponsor. Suppliers are to be accompanied by an AbbVie employee at all times.
- Suppliers are never to occupy an AbbVie employee’s office or cubicle without displaying proper AbbVie-issued identification.

- Suppliers, upon departure of AbbVie property, are to leave their visitor badges with the receptionist.
- AbbVie host/sponsor is responsible for suppliers while on site.

## **Labor**

Suppliers shall be committed to fair treatment of their employees and to treat them with dignity and respect. AbbVie expects suppliers to comply with all legal and regulatory requirements pertaining to the fair and equitable treatment of employees including:

### **1. Freely Chosen Employment**

Suppliers shall not use forced, bonded, or indentured labor, involuntary prison labor or human trafficking.

### **2. Child Labor and Young Workers**

Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment, or the age established for completing compulsory education. Employee files should be maintained with adequate data to verify ages of employees.

### **3. Non-Discrimination**

Suppliers shall provide a workplace free of harassment and discrimination. Harassment or discrimination for reasons such as race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status is not condoned or tolerated. AbbVie expects suppliers to share AbbVie's commitment to equal opportunity in employment and its commitment to the value of diverse perspectives, an inclusive culture and treating all employees with dignity and respect

### **4. Fair Treatment**

Suppliers shall provide a workplace free of harsh and inhumane treatment. This includes, but is not limited to, any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or intimidation of workers.

### **5. Wages, Benefits and Working Hours**

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits as per custom of the country of employment.

Suppliers shall in a timely manner communicate with its workers the basis on which they are being compensated. Suppliers are also expected to communicate with their workers whether overtime is required and the wages to be paid for such overtime. Suppliers shall keep accurate records regarding employee working hours and vacation hours. Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged.

### **6. Freedom of Association**

Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely with one another. Workers shall be able to communicate openly with management regarding working conditions

without threat of reprisal, intimidation, or harassment.

## **Health and Safety**

Suppliers shall protect workers in the workplace, and in any company-provided living quarters, by providing a safe and healthy environment. AbbVie expects suppliers to comply with all standard, legal and regulatory requirements regarding employee health and safety including:

### **1. Worker Protection**

Suppliers shall protect workers from exposure to chemical, biological, physical hazards and physically demanding tasks in the workplace and other company-provided facilities, including living quarters and transportation vehicles. For example, supplier's management is responsible for providing appropriate hearing protection, gloves, masks, or other forms of worker personal protection equipment based on the type of work performed.

### **2. Process Safety**

Suppliers shall have programs in place to identify, prevent and respond to potentially catastrophic chemical or biological process incidents

### **3. Emergency Preparedness and Response**

Suppliers shall identify and assess potential emergency situations affecting the workplace and any company-provided living quarters and shall minimize potentially adverse consequences by implementing and maintaining effective emergency plans and response procedures. For example, supplier's management is responsible for providing safety awareness training, safety drills or other types of safety training as required by the industry type and based on fire and safety regulations.

### **4. Hazard Information**

Suppliers shall make available safety information relating to hazardous materials in the workplace, including pharmaceutical compounds and pharmaceutical intermediate materials, to educate, train and protect workers from such hazards.

### **5. Anti-Counterfeiting**

In an ongoing effort to work together to secure the supply chain from the dangers of counterfeiting, illegal diversion and theft of AbbVie products, AbbVie expects that suppliers notify us immediately if they are offered the opportunity to purchase counterfeit, illegally diverted or stolen product or otherwise become aware of any such products.

## **Environment**

Suppliers shall operate in an environmentally responsible and efficient manner and shall strive to minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid or minimize the use of hazardous materials where possible, and to promote activities that reuse and recycle. AbbVie expects suppliers to comply with all laws, regulations, standards, ordinances, rules, permits, license approvals and orders regarding the environment and the use of restricted substances.

### 1. Environmental Authorizations

Suppliers shall obtain all required environmental permits, licenses and approvals and comply with all applicable operational and reporting requirements.

### 2. Waste and Emissions

Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater, or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.

### 3. Spills and Releases

Suppliers shall have systems in place to prevent and quickly respond to all accidental spills and releases into the environment.

### 4. Restricted Substances

Suppliers are to adhere to all applicable restricted substance laws, regulations, and customer requirements. This includes responding to requests for substance composition in materials/parts, prohibition or restriction of specific substances as well as labeling for recycling and disposal.

### 5. Conflict Minerals

Supplier shall ensure that all parts and products supplied to AbbVie do not contain "Conflict Minerals", i.e., columbite-tantalite, cassiterite, wolframite (or their derivatives tantalum, tin, and tungsten) or gold sourced from the Democratic Republic of the Congo (DRC) or an adjoining country that have directly or indirectly financed or benefitted armed groups in the DRC or an adjoining country. Suppliers shall have systems in place that are designed to meet these objectives.

### 6. Procurement

Suppliers shall have a sustainable procurement policy in place to ensure their own suppliers conduct business in a manner that minimizes potential environmental impact and avoid having adverse health impacts on communities where they operate.

AbbVie is an active member of the Pharmaceutical Supply Chain Initiative ([www.pscinitiative.org](http://www.pscinitiative.org)) and aligns with the PSCI Principles for building and implementing responsible supply chain practices in the areas of Ethics; Human Rights & Labor; Health & Safety; Environmental Protection; and Management Systems. AbbVie encourages all pharmaceutical related suppliers to join and actively engage with the PSCI organization

### 7. Setting Targets and Public Disclosure

Suppliers are encouraged to set environmental sustainability targets and publicly report progress against those targets on an annual basis. This disclosure should be made via a publicly available annual sustainability report or through a public disclosure format such as CDP. AbbVie has committed to set a

Science Based Target for greenhouse gas emissions, and we encourage all of our suppliers to set a similar target.

## **Management Systems**

Suppliers shall have a quality management system in place to facilitate continual improvement and ensure compliance with the principles outlined in this AbbVie Supplier Code of Conduct. Suppliers are encouraged to maintain conformance to international standard ISO 9001 and local regulations. Quality Management System elements include:

### **1. Commitment and Accountability**

Suppliers shall allocate adequate financial, human, and technical resources.

### **2. Legal and Customer Requirements**

Suppliers shall identify all applicable laws, regulations, rules, ordinances, permits, licenses, approvals, orders, standards, and relevant customer requirements and ensure compliance with them.

### **3. Risk Management**

Suppliers shall have mechanisms in place to determine and control risks in all areas addressed by this AbbVie Supplier Code of Conduct. Suppliers shall have adequate financial resources to assure business continuity and maintain financial solvency.

### **4. Documentation**

Suppliers shall maintain documentation necessary to demonstrate conformance with these principles and compliance with applicable laws, regulations, rules, ordinances, permits, licenses, approvals, orders, standards and relevant customer requirements.

### **5. Training and Competency**

Suppliers shall have an effective training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to perform the service that AbbVie has requested and is covered by a contract. Documented training must be available for all employees as evidence that training was performed.

### **6. Continual Improvement**

Suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary actions to correct deficiencies identified by internal or external assessments, inspections, and management reviews.

### **7. Communication**

Suppliers shall maintain open and direct communication with appropriate AbbVie business functions, including AbbVie Procurement and Supplier Management.

Suppliers shall notify AbbVie prior to making any change that may affect conformance to defined

requirements, product quality, or a regulatory filing outlined within a supply agreement and/or quality agreement.

### **Data Requirements**

Suppliers shall meet all AbbVie data requirements prior to conducting business with AbbVie.

#### **1. Supplier Set-Up**

Suppliers shall provide all key data (i.e., tax documents, banking information, etc.) to ensure proper set up in AbbVie's systems.

#### **2. Transactions**

Suppliers shall not perform any services without a fully executed contract and/or Purchase Order in place. Suppliers shall provide all accurate information on submitted invoices, as instructed by AbbVie.

## AbbVie Supplier Code of Conduct

### **ACTION REQUIRED:**

Click on the link below to attest that your company has received, read, understood and will abide by the principles, guidelines, and expectations set forth in the AbbVie Supplier Code of Conduct.

[I certify that our company has received, read and understands the AbbVie Supplier Code of Conduct and will abide by its content or will have practices implemented that align with its intent](#)