Modern Slavery Act 2015 – Transparency in Supply Chains Statement

for the year ended 31 December 2018

This statement is made pursuant to Part 6, Section 54 of the Modern Slavery Act 2015 (Transparency in Supply Chains) and applies to the following legal entities:

Alere Limited
Alere Toxicology Plc
Alere Healthcare Connections Limited
Unipath Limited
TwistDx Limited
Axis Shield Diagnostics Limited
Forensics Limited
Ig Innovations Limited

(Collectively, “Abbott”)

Our Structure and Business

Abbott is a global healthcare company that conducts innovative research and manufacturers products for human health through every life stage. Abbott is a subsidiary of Abbott Laboratories and is headquartered in Chicago, USA.

Abbott is committed to safe and fair working conditions and this extends to the partners in our supply chain. Abbott’s understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 and is guided by the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisation (ILO), particular relating to forced or compulsory labour.

Policies and Training

Abbott employees, contract workers and agents are obliged to comply with Abbott’s Code of Business Conduct, which incorporates standards prohibiting slavery and human trafficking or engaging in illegal behaviour, by carrying out training on an annual basis. Abbott’s Code of Business Conduct can be found here: http://www.abbott.com/investors/governance/code-of-business-conduct.html.

Abbott provides training to its employees and management who have direct responsibility for supply chain management particularly with respect to mitigating risks within the supply chains of products. On an annual basis, Abbott employees involved in the purchasing function or who are in the position to influence a purchasing decision are required to review Abbott’s Purchasing Code for Interacting with Suppliers, including in respect of ethical practices.

All Abbott suppliers are expected to follow the Abbott Supplier Guidelines, which document our principles, guidelines and expectations in areas including ethical behaviour, business integrity and fair competition; privacy, labour rights and worker protection; animal welfare, environmental stewardship; and health and safety practices. Our Guidelines, published in multiple languages, state that suppliers are prohibited from using forced, bonded or indentured labour, involuntary prison labour or human trafficking. Abbott’s Supplier Guidelines can be found here: http://www.abbott.com/partners/suppliers.html.
Due Diligence

At a global level, Abbott uses a supplier classification model to determine appropriate activity level to assess risk. Abbott proactively identifies suppliers for screening with a focus on those in business-critical industries, geographies and spend categories, as well as those in emerging markets. A supplier may receive a letter, a survey or an on-site audit based on this model. Information received from the supplier is then assessed to determine whether to take further steps.

Abbott’s Supplier Social Responsibility programme uses a risk-based approach combined with a real-time risk intelligence and supplier mapping tool to identify which suppliers will be surveyed. Based on survey results, suppliers deemed as high risk may receive on-site audits. In addition, the mapping tool uses a sustainability index to identify potential supplier issues, along with the risk exposure index to determine risk hot spots.

We manage compliance and third-party risk and improve supplier sustainability with these standards through our Supplier Social Responsibility programme and through our contracting process. For example, some of Abbott’s suppliers go the extra mile and exceed expectations by maintaining comprehensive corporate social responsibility programs of their own. One full-service promotional product distributor, which supplies Abbott with promotional and branded marketing materials, ensures every Abbott-branded product is manufactured following internationally recognised, independently verified, environmental and fair labour practices. This vendor only works with top-tier suppliers that have completed a product safety dossier with documentation on product testing and certification, product liability insurance, and an indemnification agreement. With a supply chain of more than 3,000 domestic and international vendors, the supplier combines six decades of global sourcing experience with an international network of manufacturers and logistics resources, offering us safe, creative and cost-effective promotional solutions.

Abbott believes in the dignity of every human being and respects individual rights, as set forth in the Universal Declaration of Human Rights. These principles are reflected in our company’s mission and core values. While governments have the primary responsibility for respecting, protecting, promoting and fulfilling the human rights of their citizens, Abbott recognises that companies play a supporting role in promoting human rights within their spheres of influence. We contribute to the fulfilment of human rights through compliance with laws and regulations wherever we operate, as well as through our policies and programs. Our global guidelines include, amongst other things, complying with child labour laws and laws prohibiting any form of forced, bonded or indentured labour or involuntary prison labour.


Accountability

Adhering to our Code of Business Conduct is a condition of continued employment with Abbott. All reports of potential violations of our Code, or any policy or procedure, are taken seriously and handled appropriately through follow-up steps, such as investigation and remediation. Where necessary, corrective action is taken to address issues and avoid recurrence. Any Abbott employee who violates our Code, or any policy or procedure, is subject to appropriate disciplinary action.

Abbott employees and suppliers are expected to report violations or possible violations of the Supplier Guidelines to Abbott Purchasing or to the Abbott Office of Ethics and Compliance.
Abbott will promptly investigate reported violations of the Abbott Supplier Guidelines and expects employees and suppliers to cooperate in the investigation. If corrective action is required, Abbott will outline steps to address the issue.

**Governance**

Abbott has several channels where questions can be asked and concerns can be raised, including via our “Speak Up” programme. Our Ethics and Compliance Helpline is multilingual and available globally 24/7 where there are concerns of a potential violation of Abbott’s values and standards of conduct.

We proactively manage social risks in our supply chain to prevent abuse and exploitation, and to protect human rights. By striving for excellence in our supplier relationships, we seek to foster economic opportunity, shared value and sustainable market growth.

Abbott’s position on human rights is reinforced in our Code of Conduct and employment, ethics and procurement policies.

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Trevor Fellows  
Director  
Alere Limited  
Date: 11 July 2019

Nicholas Breare  
Director  
Alere Toxicology Plc  
Date: 11 July 2019

Nicholas Breare  
Director  
Alere Healthcare Connections Limited  
Date: 11 July 2019

Trevor Fellows  
Director  
Unipath Limited  
Date: 11 July 2019