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This print version of the ABB Code of Conduct will not be kept current. Please check www.abb.com/integrity for the most current version of the ABB Code of Conduct and other information regarding ABB's Integrity Program.



Code of Conduct

Your questions are worth asking.
Find the answers in the ABB Code of Conduct.

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1 Scan the QR-code.
2 Download the ABB Code of Conduct mobile app.

Learn more
For additional information on relevant policies and procedures, consult the ABB Governance Portal.

Introduction to the Code of Conduct

To grow and be successful, ABB depends on the trust of our stakeholders, including employees, customers, business partners, shareholders and the communities and societies we serve. The bedrock of that trust is integrity – an uncompromising commitment to adhere to the highest standards of ethical business conduct and professional behavior.



Message from the CEO
I'm very pleased to present ABB's Code of Conduct, revised and updated to reflect the fast-changing world in which we operate, as well as our 2030 sustainability goals, one of which is to create a culture of integrity and transparency throughout our value chain. To grow and be successful, ABB depends on the trust of our stakeholders, including employees, customers, business partners, shareholders and the communities and societies we serve. The bedrock of that trust is integrity – an uncompromising commitment to adhere to the highest standards of ethical business conduct and professional behavior.

At a time when technological advances are accelerating and speed is a key competitive advantage, our Code reflects our collective and individual commitment to integrity. It provides practical guidance on how we conduct business worldwide and helps us make the right decisions in ambiguous or complex situations. The Code manifests our company values – courage, care, curiosity and collaboration – in concrete integrity practices: empowerment and accountability, respect and governance, awareness and continuous improvement, and transparency.

Above all, the Code requires us to be fair, honest and respectful in our dealings with others, to comply with all applicable laws and regulations and to promptly report violations of the Code. Beyond that, we are committed to safe and healthy work routines, adopting sustainable and environmentally sound business practices, and respecting human rights.

The Code applies to all of us, and we are committed to holding each other accountable for our actions. ABB leaders have a special responsibility to lead by example, to anticipate and take action to mitigate risks, and to ensure that integrity is a defining characteristic of our organizational culture. ABB employees have an obligation to read, understand and adhere to the Code and, by doing so, contribute to making the company a better workplace for everyone. To ensure that employees and other stakeholders feel free to raise concerns about potential violations, the Code contains a commitment against retaliation.

Let's work together to live by the Code of Conduct as a reflection of who we aspire to be as a company while advancing ABB as both a technology leader and a trusted corporate citizen.

Thank you.

Morten Wierod
CEO ABB

Why we have a Code of Conduct

ABB's employees work in more than 100 countries, come from varied cultural backgrounds and possess deep skillsets across many disciplines. They speak numerous languages and have wide-ranging industry experience, knowledge and expertise. We are proud of our global workforce and the competitive advantages that our diversity affords us. Despite our differences, ABB employees share a defining sense of personal integrity in the way we do business and work together.

Our Code of Conduct is the foundation of our strong collective and individual commitment to integrity and provides practical guidance to our workforce, suppliers and other business partners in how we expect business to be conducted world-wide. We live in a challenging, fast-paced world where technology and global events continue to transform our work. Complex and ever-changing laws and regulations govern our global business and the markets in which we operate, and customers are seeking faster, more comprehensive and simpler solutions. To continue to be an industry leader in this environment, we must drive the highest standards of integrity, accountability, sustainability and transparency. This commitment is reflected in our Code of Conduct.

Where the Code of Conduct applies

ABB's Code of Conduct applies globally to all of ABB's employees, managers, officers, directors, consultants, self-employed contractors, casual workers, agency workers and volunteers. It also applies to ABB's wholly owned affiliates and subsidiaries as well as all employees of any joint venture or other entity in which ABB has majority ownership interest or exercises effective control. We expect our business partners to adhere to ethical standards in line with our Code of Conduct and – for our suppliers – our Supplier Code of Conduct.

In relevant entities where ABB does not own a majority share or otherwise exercise control, we expect business partners to adopt the ABB Code of Conduct (if there is no similar Code of Conduct already established), and to have in place robust integrity-related terms and conditions to govern the ethical standards that we expect of each other for the duration of our business relationship.



We speak the same Code.

Five integrity principles

1 We behave and do business in an ethical way

2 We work in a safe and sustainable way

3 We build trust with all stakeholders

4 We protect ABB’s assets and reputation

5 We speak up and do not retaliate



Communications

We communicate in a respectful, honest, transparent and professional manner. Our communications must reflect our reputation and brand as a forward-thinking technology leader. Whether communicating internally or externally, regardless of the medium or channel, we protect ABB's confidential data, provide comprehensive and accurate information, and always support open discussions and dialogue.

Keep in mind

- Communication channels must be used responsibly. Ensure the content being communicated is business-appropriate, non-confidential and constructive.
- Our workplace is not a public place. Please presume that the information and content that we hold or generate is business-confidential or protected by law. Disclosing internal materials (such as ABB's know-how, trade secrets, methodologies, organizational charts, business plans and similar information) could result in civil or criminal liability for you or the company.
- Timely and responsive business communication is vital. If you are not able to answer questions promptly, inform those involved and tell them when you will be able to respond.
- We communicate across time zones, languages and cultures. Be aware of time differences, act sensitively and remember that people who speak other languages may interpret your message differently than you intended. Before communicating, please consider whether the message could be perceived as discriminatory, offensive, harassing, threatening or defamatory.

Your role

- Familiarize yourself with ABB's internal guidelines and regulations for communications, branding and social media. If you are not sure whether certain content is appropriate to communicate, ask your team's communications manager.
- If you are contacted by a member of the news media about ABB, always refer that person to the media relations department or an authorized company spokesperson.
- If you make an error in communicating information online or on social media, please correct it promptly. Be sure to indicate transparently that a correction has been made.
- Inappropriate communication might lead to difficult situations. If you find risky/inappropriate content on internal or external channels, or you are unsure whether content is appropriate to communicate, please contact your team's communications manager.

Whether communicating internally or externally, regardless of the medium or channel, we protect ABB's confidential data, provide comprehensive and accurate information, and always support open discussions and dialogue.



Conflicts of interest

We act in the best interests of ABB. We use ABB's property and information only for proper and legitimate business purposes. We ensure that any decisions we make on behalf of ABB are independent of, and not influenced by, personal interests. We disclose promptly any personal or professional interests that might reasonably be perceived to conflict with the best interests of ABB, create an improper appearance or affect our judgment in carrying out our responsibilities at ABB. We avoid external engagements or activities that might interfere with our responsibilities to ABB or harm the company's reputation.

Keep in mind

- A conflict of interest can be actual, potential or apparent – and in any of these cases, mitigating action might be required.
- An actual conflict of interest arises when there is a direct conflict between your existing personal interests and your current responsibilities to ABB.
- A potential conflict of interest arises when there are circumstances that may develop into an actual conflict of interest between your existing personal interests and your responsibilities to ABB in the future.
- A perceived conflict of interest arises when a reasonable person (such as a colleague) might think that your judgment is likely to be compromised by personal interests that could improperly influence your business decisions – whether this is in fact the case or not.
- You should ask yourself whether a colleague who is aware of your personal interests or circumstances might reasonably call into question the integrity of your business decisions due to those personal interests or circumstances.
- Even the appearance of a conflict of interest can create unnecessary problems for you and ABB, including potential harm to reputation, trust and morale.
- Having a conflict of interest – or the appearance of a conflict of interest – is not a violation of the Code of Conduct in itself. However, failing to disclose promptly any actual or potential conflicts is a violation and could lead to disciplinary action.
- Conflicts of interest arise in many common situations – for example, you may have a family member or close friend who works at an ABB supplier, customer or competitor, or you may serve on the board of a charity, which ABB supports or might support in the future.
- Personal relationships can create actual or perceived conflicts of interest, and in certain circumstances, can become a risk to your impartiality and to ABB. For example, a line manager who supervises an employee with whom they have a close personal relationship would have a conflict of interest, as would someone who approves payments or discounts to a sales channel owned by a family member, or who engages a supplier owned by a close friend.

We disclose promptly any personal or professional interests that might reasonably be perceived to conflict with the best interests of ABB.

Your role

- Promptly disclose in the Integrity Gateway any potential and/or actual conflicts of interest, including relationships that could give rise to an actual or perceived conflict of interest.
- If you have a family member or close personal relationship with someone in your reporting line (regardless of the number of levels), you must disclose this as a potential conflict of interest. The same applies to relatives or close friends with whom you have business interactions or where either of you holds a position of authority or trust within the company (including Human Resources, Legal & Integrity, Finance or another gatekeeper function in which one of you could be required to execute duties affecting the other).



- Avoid having any direct or indirect influence on the selection, recruitment or promotion of anyone you are related to or with whom you have a close personal relationship.
- Avoid situations where there could be a conflict between your personal interests and those of ABB.
- Avoid performing outside work during ABB business hours or using ABB resources for such work.
- Never use confidential ABB information or commercially sensitive information for any reason other than for a legitimate business purpose during the proper exercise of your responsibilities at ABB.
- If you work in a position where there is an actual, potential or perceived conflict of interest due to a personal or financial relationship, you must promptly disclose the relationship in the Integrity Gateway for review by Legal & Integrity. In most instances, it is the responsibility of the person with greater seniority in any potential or actual relationship to ensure that any actual, potential or perceived conflict of interest is disclosed.
- If you are unsure whether your personal circumstances present an actual, potential or perceived conflict of interest, the best course of action is to protect yourself and ABB by being transparent and disclosing it at the earliest opportunity.
- If you propose to hold a third-party board position or directorship (external to ABB, whether paid or unpaid), you must disclose this to ABB to ensure that you have the appropriate approval under our Corporate Authorization Table.

Record-keeping, controllership and prevention of money laundering

We accurately record and report our finances, transactions and assets. We comply with the laws that govern our financial records, accounting principles, tax obligations and financial disclosures. We have a zero-tolerance approach to fraud or otherwise misleading behavior in relation to our recording and reporting requirements.

Money laundering is the practice of seeking to disguise the proceeds of criminal activity in legitimate business dealings or using legitimate funds to support criminal activities. We comply with laws against such practices and are vigilant about any suspicious financial transactions that may be intended to conceal the true source of funds or parties connected with a transaction.

We protect ABB property, assets and data from improper or unauthorized use and take care to avoid their loss, theft or damage. We use ABB assets for legitimate business purposes only.

Keep in mind

- Financial records include books and accounts as well as the documents relating to the preparation of such records. Company books and records can also include almost any tangible financial-related data.
- A failure to record a transaction or payment accurately, or to mislead, conceal, alter or otherwise manipulate records could constitute fraud and may result in legal or reputational implications for employees or for ABB.
- Releasing information or data that is confidential or commercially sensitive without proper authorization may have undesirable contractual or other legal implications for ABB and the individual who released the information.
- ABB's assets, physical or otherwise, can include anything owned or possessed by ABB that provides value for the company, including sensitive data, physical and intellectual property and financial assets.

Your role

- Ensure that all business transactions are fully, fairly and promptly recorded in accordance with ABB's accounting principles, internal procedures and applicable laws.
- Do not sign any approval or other document without first verifying its accuracy and ensure that any underlying transaction serves a legitimate ABB business purpose.
- Do not alter or destroy any record that you have been instructed to keep or that is within ABB's document retention limits.
- You are responsible for safeguarding and using ABB assets appropriately and for cooperating fully and honestly with internal or external auditors, regulators and enforcement authorities.

Money laundering is the practice of seeking to disguise the proceeds of criminal activity in legitimate business dealings or using legitimate funds to support criminal activities.



- Be alert for and report transactions that seem suspicious, including but not limited to:
  - Requests for ABB to pay in cash or installments to several bank accounts in a currency not used in normal terms of the business arrangement or set just below the reporting threshold for foreign currency payments in that country
  - Requests for a payment to (or actual payments from) a new, special or individual bank account, particularly where such an account is outside the normal country of operation
  - A supplier request for an upfront payment to an offshore bank account or to a destination known to be a tax haven
  - An end customer that informs ABB that payment will be made through an entity that it has established in another country or through a third party
  - Any other requests or proposed arrangement which may indicate potential fraud, money laundering or tax evasion

Environment

We comply with the environmental laws and regulations in the countries where we do business. In addition, we promote sustainable development and strive to achieve ABB's sustainability goals by supporting economic progress, environmental stewardship and social development. We are dedicated to continuous improvement in these areas with respect to both our offerings and operations and seek, among other things, to reduce emissions and waste, decrease the use of hazardous substances, and conserve water and energy in the effort to tackle climate change.

Keep in mind

- Our commitment goes beyond existing laws and regulations. We seek to manage our environmental footprint transparently and ethically in the interests of our stakeholders, including customers, employees, shareholders, suppliers, other business partners and the communities in which we operate.
- We expect our suppliers and other business partners around the world to share in our commitment to protect the environment.
- We must immediately report dangerous situations or unacceptable environmental conditions and impacts so that corrective and preventive actions can be taken.
- We should consider what ABB can do to reduce the environmental impacts of its products and services throughout their life cycle, from design and procurement to logistics, materials and use, and end-of-life disposal of products.
- ABB has a policy on sustainability and its economic, environmental and social requirements, and we expect our employees to be familiar with it and its guidance.

Your role

- Be mindful of environmental considerations relevant to your work and the requirements of environmental compliance for your job, function or site. Raise with your manager ideas to reduce the environmental impacts of our operations, products and services.

We should consider what ABB can do to reduce the environmental impacts of its products and services throughout their life cycle, from design and procurement to logistics, materials and use, and end-of-life disposal of products.

- Watch out for suppliers or other business partners that do not have or do not engage in safe or sustainable environmental practices.
- Ensure that your facility, project or workplace has in place all the necessary environmental licenses or permits before commencing work. If you are uncertain whether you have all the right clearances, contact the Legal & Integrity team or the Health, Safety, Environment & Security team immediately.
- Dispose of waste in accordance with ABB's internal and local processes and applicable laws.
- Promote awareness, ownership and engagement about our environmental risks and sustainability opportunities.



Fair competition and antitrust

We compete fairly, openly and independently. We comply with all laws protecting fair competition. These laws prohibit agreements restricting competition, including between competitors or companies at different levels of the supply chain. Such laws may impose limits on the commercial behavior of companies that hold a dominant position in the market. These laws also require that we seek regulatory approval for certain mergers and acquisitions (M&A), including minority stakes, as well as for certain types of collaboration agreements.

Compliance with these laws ensures that our hard work and innovation is rewarded, ultimately benefiting our customers. Violation of competition and antitrust laws is a serious matter and could result in criminal prosecution and grave reputational harm for you and ABB.

Keep in mind

- Any discussion, agreement or understanding (direct or indirect) with a competitor on fixing prices, allocating markets, customers or bids, or restricting production or collective boycotts is illegal.
- As a rule, we should not (directly or indirectly) solicit, obtain or exchange commercially sensitive information that could influence a decision of ABB or a competitor concerning cost, margins, pricing data, future strategies, product plans, employee salaries, etc.
- We should not fix the price at which our channel partners or customers resell our products, including imposing/agreeing on a minimum resale price.
- We should always consult the Legal & Integrity team before entering into an exclusive arrangement or imposing restrictions on the ability of a of a sales channel or customer to resell in certain markets or to specific categories of buyers.

Your role

- Comply with antitrust and other laws regulating competition.
- Be familiar with and follow ABB's policies and procedures relating to antitrust.
- Immediately and proactively distance yourself and ABB from inappropriate conduct of others (e.g., in meetings of a trade association).
- If you are in doubt whether your business strategy or conduct is compliant with antitrust law, immediately contact the Legal & Integrity team for guidance.

Compliance with these laws ensures that our hard work and innovation is rewarded, ultimately benefiting our customers

"How do we play fair?"

Fair employment, inclusion and respect in the workplace

We are a global company with employees from many different countries, backgrounds and cultures. We employ people of different genders, ethnicities, religions, generations and abilities. We believe that our diversity is a source of strength and competitive advantage. To ensure our employees are engaged, motivated and able to realize their potential, we encourage and promote a culture of mutual respect, tolerance and collaboration. We believe that competence, performance and potential should guide our employment-related decisions, such as hiring, retention, training opportunities and promotion. ABB supports the principles contained within the International Labour Organization (ILO) Core Conventions on Labour Standards. We follow the applicable employment and labor laws wherever we do business, including wage-and-hour, immigration, collective-bargaining, anti-discrimination and similar employment rules. We are committed to providing a work environment free from harassment, intimidation and threats or acts of violence. Any harassment, including sexual harassment or other discriminatory treatment, will not be tolerated. We all have a responsibility to report any such conduct and to lead by example.

Keep in mind

- Employment-related decisions should always be based on relevant qualifications, merit, performance and other job-related factors. Discrimination is not tolerated.
- Workplace bullying and harassment, including the use of force, threats or coercion – whether verbal, physical or social – are never acceptable. Bear in mind that bullying, harassment, abuse, intimidation and attempts to dominate others can be committed by individuals or groups, in person or online (or through email or messaging platforms), and can be obvious or hidden.
- Harassment or discrimination based on personal characteristics or attributes is unacceptable. Examples include but are not limited to: behavior that denigrates, ridicules, embarrasses, intimidates or excludes those belonging to a particular ethnic group or those with a disability. Other common forms of harassment and discrimination include offensive or crude gestures or commentary about a particular gender; and using derogatory terminology to refer to someone's sexuality, gender identity or age.
- Sexual harassment is a specific type of harassment involving unwelcome conduct of a sexual nature that may cause humiliation, offense or intimidation to another person. ABB takes a zero-tolerance approach to sexual harassment. Examples of sexual harassment include but are not limited to: intrusive inquiries into a colleague's private life; reference to sexuality or physical appearance; unwanted body touching, including standing too close to someone or brushing up against another person; obscene, suggestive or offensive communications; sexual jokes, anecdotes or images; leering or staring; and unwanted sexual compliments or flirting.
- We have high standards for employment and these apply globally. We are committed to providing a work environment free from all types of harassment, intimidation and threats or acts of violence. We will not tolerate any form of harassment and take extremely seriously any allegations against our employees (or suppliers or other business partners) regardless of whether such conduct is illegal under local laws in the country in which it occurs.
- The high standard of behavior that we expect in the workplace also applies to all events that our employees attend in the context of their relationship with the company. These include social events that are organized by ABB as well as those that are informally organized among colleagues. Examples include but are not limited to: festive events, conferences/corporate functions, offsites, downtime at training events, client/networking events, promotion and leaving parties, group holidays and dinner/drinks after work.
- ABB applies the same behavioral standards in its relationships with contractors and temporary workers. ABB therefore expects that they are treated with the same respect as ABB employees and that contractors and temporary workers apply the same standards to their own behavior and, where applicable, in their dealings with their own employees.

Your role

- Lead by example by treating colleagues with respect and embody our standards of fair treatment, diversity and inclusion. Help make ABB an employer of choice.
- Encourage our culture of speaking up, do not retaliate against those who do speak up and take a clear stand against conduct that is inconsistent with this culture and the company's values.
- Engage in learning opportunities to remove bias, increase sensitivity to differences and build an inclusive culture.
- Do not use offensive language or make offensive gestures, including sexual advances, racial slurs or negative comments about religion, ethnicity, color, age, biological sex, gender identity or expression, sexual orientation, political beliefs, citizenship, national origin, language, disability, parental status, economic/class status or veteran status. Be aware that language, gestures and images may still be discriminatory even if they are intended in jest.
- If you believe you have observed or been subjected to discrimination, harassment, intimidation or threats or acts of violence, please raise the matter promptly through one of our reporting channels.

We are committed to providing a work environment free from harassment, intimidation and threats or acts of violence. Any harassment, including sexual harassment or other discriminatory treatment, will not be tolerated. We all have a responsibility to report any such conduct and to lead by example.



Global trade

We operate in a global environment. We comply with applicable trade laws and regulations, including those relating to import and export controls, trade sanctions and customs procedures, and we expect our business partners to do the same. ABB has robust policies, procedures and controls to mitigate risks related to trade, including appropriate screening of transactions that might involve embargoed or sanctioned countries, processes to facilitate compliance with trade compliance laws, and systems and training to ensure accurate declarations to trade authorities.

Keep in mind

- Many countries restrict the export or transfer of certain items, software and technology as well as the provision of services and transfer of funds to certain countries, regions, individuals, entities or governments for national security or foreign policy reasons, or due to other concerns. We must conduct appropriate assessments to ensure that any necessary government authorizations are obtained and that our activities do not conflict with applicable trade compliance laws.
- Exports may take many forms and do not only apply to physical items. An export may occur when you carry electronic devices that contain information across a border, when you transmit that information electronically or place it in a collaborative workspace that others may access. Exports can also occur when a visiting foreign national views certain controlled information at your site.
- If you initiate – even occasionally – an import or export of physical or intangible items, you must follow the law of the countries involved and the requirements set out in ABB's Global Trade Compliance Procedure. Even minor transactions (low volume, low price range, or even cost-free replacements and/or goods transported for service delivery) are covered by trade compliance laws. Import and export documents must be properly completed, verified for accuracy and recorded in accordance with ABB's Global Trade Compliance Procedure.

Your role

- Do not export or transfer (directly or indirectly) controlled items without the required export authorization or without complying with the terms and conditions of any relevant licensing requirement.

Do not cooperate with any party that seeks directly or indirectly to send goods, software or technology to a sanctioned country or restricted party or enter into any transactions that may violate applicable anti-boycott laws.

- Do not engage in any transaction that involves – or that you suspect involves – a sanctioned country, restricted party or an unauthorized end use (e.g., military applications, weapons) without following the requirements set out in ABB's Global Trade Compliance Procedure and seeking counsel from a trade compliance officer.
- Maintain appropriate awareness of how trade compliance laws are applied and ensure that you complete any required training so that you have at least a basic understanding of the most critical trade-related concepts that apply to your day-to-day work.



- Ensure that you are familiar with all elements of a transaction, such as the products, parties, end use and country of destination, and comply with all applicable laws as well as ABB's Global Trade Compliance Procedure.
- Be alert for suspicious transactions and behavior involving unclear or incomplete information from customers, suppliers, business partners or other third parties about end use, delivery locations or delivery dates. Do not cooperate with any party that seeks directly or indirectly to send goods, software or technology to a sanctioned country or restricted party or enter into any transactions that may violate applicable anti-boycott laws. Ensure that you escalate such matters to a trade compliance officer for further guidance.
- Only work with duly approved customs brokers, freight forwarders and logistics providers and immediately report to a trade compliance officer any payments that exceed the amount on the invoice or are for unidentified or vaguely described services.
- Ensure that products and other information are clearly identified, correctly valued and accurately classified with respect to export controls and customs regulations. Report any inaccurate descriptions, valuations or classifications of goods or data to a trade compliance officer.



Health, safety, environment and security

We are committed to providing a healthy and safe work environment for our employees and contractors, supported by a strong learning culture. We have implemented a robust Health, Safety, Environment and Security (HSE&S) Management System as well as workplace standards that meet or exceed legal requirements in the countries where we do business, and we expect our employees, contractors, suppliers and other business partners to comply with them. Safety is part of our license to operate, a bedrock of our organization and vital to our operations, products and services.

Keep in mind

- Dangerous situations or unacceptable health, safety, environment or security conditions must never be ignored. Always report these conditions via the hazard or incident reporting modules within the global HSE&S Management System or to your manager so that corrective and preventive actions can be taken.
- It is prohibited to work under the influence of alcohol, illegal drugs or even prescription drugs that might interfere with your ability to perform a task safely.

Dangerous situations or unacceptable health, safety, environment or security conditions must never be ignored.

- We expect our suppliers, contractors and other business partners to follow the same high standards for health and safety that we do.
- Government regulators take health, safety, environment and security matters very seriously. Understand there may be severe consequences, including civil or criminal penalties, for violations of health, safety, environment and security regulations.

Your role

- Stop work if it is not safe for you or others to continue.
- Be sure you understand your required task and that you are comfortable and qualified to fulfill it. Ensure that you follow a safe working procedure, that you have all necessary permits, and that you use the correct tools and protective equipment applicable to the task.
- Make sure that people in your immediate vicinity are aware of what you are doing so that they can also take suitable precautions.
- Be familiar with ABB’s health, safety, environment and security standards and always follow their requirements when working in an ABB factory, on a project or at a customer site.
- Make health and safety a priority in your workplace and life, including “small” things like wearing seat belts and not driving while distracted.
- Do not punish or discipline an ABB worker for errors or system factors over which they have no control.
- Foster an atmosphere of trust and psychological safety, which is essential for building a strong health, safety, environment and security culture where staff feel supported and treated with respect and dignity, even in situations where something goes wrong.
- Present ideas or recommendations for improving health, safety, environment and security conditions in our working environment to your manager.
- Be informed about recommendations from ABB Security regarding business travel.
- Be familiar with the procedures for first aid and emergencies at your location, including the location of first-aid kits, defibrillators, trained personnel, safe exits and evacuation procedures.
- Speak up if you encounter dangerous or environmentally unsound conditions so we can correct and learn from them and make improvements.

Human rights

ABB promotes an organizational culture that supports human rights and seeks to avoid complicity in human rights abuses. We support the principles contained within the International Bill of Human Rights, the United Nations' Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organization (ILO) Core Conventions on Labour Standards, and other applicable laws and principles. We require our suppliers, contractors and other business partners to abide by similar standards in those areas where human rights issues come into play, such as working hours and conditions, discrimination and equality, child labor, fair wages, compulsory or forced labor and modern slavery.

Keep in mind

- We conduct risk-based due diligence to ensure our suppliers and business partners share our commitment to human rights and do not knowingly work with any supplier or business partner that engages in forced labor, modern slavery or human trafficking, or that exploits or discriminates against anyone, including children and vulnerable groups.
- We respect rights related to freedom of association, collective representation, fair compensation, equal treatment and safe and healthy workplaces.
- We address complaints and grievances through ABB's reporting channels and seek to provide an appropriate remedy to affected stakeholders.
- We are involved in multilateral efforts to support human rights through organizations such as the UN Global Compact and the Global Business Initiative on Human Rights, and in a wide range of activities to promote corporate respect of human rights.
- Respect for human dignity begins with our daily interactions with one another, our customers and business partners. It also includes promoting diversity and inclusion, accommodating people with disabilities and doing our part to protect the rights and dignity of everyone with whom we do business.

We respect rights related to freedom of association, collective representation, fair compensation, equal treatment and safe and healthy workplaces.

Your role

- When visiting worksites, whether or not they belong to ABB, you should immediately report suspicious work practices, such as the use of child labor or unsafe or unhealthy workplaces, to the Legal & Integrity team or the Corporate Responsibility team.
- Before establishing a relationship with a supplier or business partner, carry out appropriate due diligence in accordance with existing ABB processes to ensure that they, and any relevant projects with which they are associated, are not involved in actual or potential human rights violations and that they are committed to comparable standards as ABB. Due diligence includes understanding any past violations and the associated remedies and preventive actions undertaken.
- Consider what impact an ABB project, product or service might have on human rights in the region or country where it is to be undertaken or sold. Discuss these impacts with the appropriate manager or senior colleague for the relevant project, product or service, as well as the designated human rights subject matter expert for your business.
- Monitor human rights practices of business partners on a regular basis. Include human rights in the continuous dialogue with those partners and in business review meetings.
- Be particularly sensitive to human rights when doing business in countries where the rule of law is weak or where government does not consistently follow transparent processes.



Ethical conduct, anti-bribery and anti-corruption

We compete for business strictly on our merits. We do not tolerate any form of bribery or abuse of power for personal or commercial gain. We do not directly or indirectly offer or give, nor do we request or accept, anything of value to or from a public official, private person or other third party for any unlawful, corrupt or improper purpose or for facilitating a routine government service or action. This approach extends to all our operations and geographies regardless of local business practices and applies equally to any third party or customer with which we partner. We only enter into business relationships with reputable third parties that share our ethical standards.

Keep in mind

- Bribery, corruption and improper payments can take many forms, including gifts, travel and hospitality, payments made through customers, business partners or other third parties, or donations to organizations affiliated with public officials or customers.
- Gifts, travel and hospitality may be offered only in accordance with the relevant ABB policies and procedures, consistent with the recipient's own internal policies and local law. Business gratuities may be perceived by the recipient as a request to be treated favorably, especially if offered during an active tender. Gifts of cash or cash equivalents are strictly prohibited.
- You must follow the relevant ABB policies and procedures for engaging and monitoring third parties, including those that assist in marketing and sales activities or that represent ABB.
- Employees of state-owned enterprises are considered public officials under our internal policies and under anti-bribery laws.
- We prohibit "grease" or "facilitation" payments, even where local law or business custom may permit them. Such payments are generally made to a public official as a condition for obtaining routine government services or benefits to which everyone is normally entitled.
- Personal safety payments are only permitted in the rare situation that you are under severe duress, or in imminent danger of real and inevitable harm to your physical safety or personal property, and no other prudent alternatives are available. If it is safe and possible to do so, contact the ABB Emergency Line (+41 43 317 77 00 / +41 22 785 64 64) for advice and assistance. Once you have made the payment and are safe, you must report this to your line manager, Country Security Manager and your Legal & Integrity contact so the payment can be correctly recorded and thoroughly investigated.
- Offering, authorizing, making or receiving an improper payment violates ABB's policies and procedures and may expose you and the company to criminal prosecution and severe reputational harm.

We do not tolerate any form of bribery or corruption, and only enter into business relationships with reputable third parties that share our ethical standards.

Your role

- Watch out for and report immediately to the Legal & Integrity team any warning signals that might suggest an improper payment or business relationship, such as:
  - Engagement of third parties that do not appear to add legitimate business value, are not qualified under ABB's processes or do not share our ethical standards
  - Unreasonable sales commissions, fees or distributor discounts
  - Requests for "grease" or "facilitation" payments
  - Sales or transactional documents in which the services are vague or include unclear descriptions on invoices, or any request to document a transaction inaccurately
  - Suggestions that a third party has political or undue influence on a customer's decision-making
- Be alert to requests for donations to charities or organizations that might be affiliated with a customer or public official and follow the relevant ABB policies and procedures relating to charitable contributions. ABB prohibits all political donations or contributions (see "Working with governments").
- Turn down any request from a government official for a "grease" or "facilitation" payment a payment to that official as a condition for obtaining routine government services or benefits to which everyone is normally entitled. Report the request to the Legal & Integrity team.
- You are responsible for knowing and following the laws in the countries where you do business – check first with the Legal & Integrity team if you have any uncertainty.



Information and technology security

We use information technology (IT) to advance the business interests of ABB and our customers. We recognize that the use of IT, including software (e.g., email, messaging services and cloud applications), hardware (e.g., mobile phones and laptops), and networks or the internet might expose us to cyberattacks and other internal and external threats. We use our IT responsibly and only for legitimate business purposes that are consistent with ABB's interests and rights and in accordance with ABB's rules and guidance.

Keep in mind

- Social media and all other means of communication must be used responsibly. Inappropriate communications or unauthorized sharing of information (e.g., images, comments and links) could cause legal or reputational damage to you, your colleagues, ABB, our customers or others.
- Limited personal use of ABB's IT assets is permissible in accordance with applicable policies, provided such use is not in conflict with ABB's interests, rules or guidance or your job responsibilities.
- Cyberattacks are typically attempts to steal or tamper with data or make systems unusable. These attacks can have many victims, including customers and employees. Compromised systems can severely interfere with our IT and operational technology systems.
- Portable storage devices, such as USB sticks, may contain malicious software and pose a risk to our systems. They should only be used with the greatest of care and to the extent authorized.
- Information produced and stored on ABB's information systems or in related applications is considered ABB information and a company asset. ABB reserves the right to monitor the use of its information systems and related applications and to access, retrieve and disclose all such information except where limited by law or agreement.
- Emails and other forms of electronic and instant communication might be regarded as statements issued by ABB and should be written with care. Failure to do so may bring ABB into disrepute or put ABB at a disadvantage in a commercial relationship or claim.

Your role

- Never download, access, install or use software (e.g., email, messaging services and cloud applications) that is not authorized by ABB for business purposes, or that you are not authorized or licensed to use on ABB information systems.
- Never download or store ABB information on personal or non-ABB equipment or in applications which are not authorized by the company, or which do not comply with ABB enrollment rules. Only store appropriate content on your ABB-managed mobile phone, computer or other electronic devices.
- Protect your passwords. Do not write them down. Do not share them with others, including the Service Desk (MyIS) and support staff.
- Only use ABB accounts (not personal accounts) and authorized tools for business communication and storing ABB data.
- If you become aware of a possible cyberattack or other malicious behavior on ABB's systems or assets, you must immediately inform the Service Desk (MyIS).
- Act with caution with emails or other messages from unknown sources. Do not open suspicious attachments or links as they may put ABB's information systems at risk. Report such emails or other messages through the specific means provided in the email system or to the Service Desk (MyIS).
- Do not post inappropriate content on the internet or include in any communication when using ABB's information systems. Do not post pictures of colleagues or their computer screens on the internet that could reveal ABB intellectual property, personal data or confidential information.
- Ensure you fulfil your security obligations prescribed in ABB's Information Systems policies to protect the IT assets you manage or with which you work.

We recognize that the use of information technology, including software (e.g., email, messaging services and cloud applications), hardware (e.g., mobile phones and laptops), and networks or the internet might expose us to cyberattacks and other internal and external threats.



Inside information and insider trading

We do not use material non-public information about ABB or any other company for personal financial gain or advantage. Such information may include, but is not limited to: projections of future earnings or losses, pricing, proposals, changes in personnel, business acquisitions or divestments, unannounced awards to suppliers, unpublished information about new products or services or any other non-public information that, if disclosed, might influence a person's decision to buy, sell or hold a company's securities. We also do not communicate information of this nature to anyone who is not entitled to be aware of it. Trading on such information or providing it to someone else impairs the integrity of the market and could be a violation of the law.

Keep in mind

- Laws and agreements with stock exchanges prohibit anyone with material non-public information from using that knowledge in the trading of securities or from disclosing that information to others.
- You might come into possession of non-public information about ABB or other companies, particularly those with which ABB does business, such as customers and suppliers. Trading securities such as shares, bonds or options while possessing material non-public information is both unethical and illegal.
- It is not permitted to share material non-public information with ABB colleagues unless they are on the approved list of individuals with a need to be informed about it.
- It is against the law to provide "tips" or share material non-public information with other people, including family members or friends.

Your role

- Be aware of ABB's strict routines and guidelines for the handling of non-public information, especially if it is material.
- If you are working on the acquisition of another company, the divestment of an ABB company or ABB assets, or the development of a joint venture, you will be required to sign a confidentiality agreement and must not trade securities based upon material non-public information you learn in the process.
- If you are unsure whether you have material non-public information, contact the Legal & Integrity team to discuss your situation.
- If you believe there is a requirement to disclose material non-public information, obtain approval from the Legal & Integrity team.

It is against the law to provide "tips" or share material non-public information with other people, including family members or friends.

"When don't we tip?"

Intellectual property and confidential information

ABB is known for leading with technology. Innovation has been in our DNA since our founding more than a century ago. We are strongly invested in continuously creating and protecting ABB's innovation, products, technologies and brand through a strong portfolio of intellectual property rights, including patents, copyrights, trademarks, service marks, trade secrets, design rights, domain names and other proprietary rights. We possess extensive know-how and confidential information that give us a competitive edge in the marketplace. We vigorously protect our intellectual property and confidential information, and follow our internal policies on the proper use, safekeeping, marking and handling of such property and information. We are committed to respecting the intellectual property and confidential information of others and expect the same from them in return.

Keep in mind

- Prior to dissemination, promptly disclose ideas, inventions or developments to ABB's Intellectual Property counsel so that appropriate legal protections may be put in place.
- Misappropriation or unregulated use of the ABB brand or other trademarks not only leads to business loss but also ABB brand dilution. Respect ABB's branding guidelines and report any suspected unauthorized use by others.
- Confidential information in its most valuable form is sometimes referred to as a "trade secret," a type of intellectual property. It is likely that you regularly handle confidential or trade secret information on behalf of ABB. You must safeguard its contents from unauthorized disclosure to third parties. Avoid discussions of such information in public places and use privacy filter screens on laptops when working externally.
- Confidential information must be appropriately labelled and classified, and access should be limited only to those who have a specific need to know.
- A proper non-disclosure agreement should be signed before disclosure of any confidential information.
- Your obligations regarding the confidentiality of ABB's proprietary information remain in place even after you are no longer employed by ABB.
- Inappropriate use of others' intellectual property or confidential information may expose you and ABB to possible civil and criminal penalties.
- When handling information, data, software or technology that may be covered by intellectual property rights, you must ask:
  - Who owns it?
  - Am I authorized to use it?
  - May I share it with others?
  - Are the relevant user license or access rights still valid?

We vigorously protect our intellectual property and confidential information, and follow our internal policies on the proper use, safekeeping, marking and handling of such property and information.



- ABB has processes in place that aim to mitigate any risks associated with third-party owned intellectual property, and you need to consider these in your daily business dealings.
- It is imperative that you respect confidential information of third parties, including customers, suppliers and other business partners, as well as your former employers. Unauthorized use of such information has an impact on ABB's image and may expose ABB and you to civil and criminal penalties. Such use can also preclude us from implementing products and technology in our business activities.

Your role

- Use ABB's confidential information, and the authorized confidential information of others, for business purposes only, and disclose it only to those who are authorized to use it and have a need to know.
- You are permitted to disclose confidential information without prior notification to ABB as part of a report of potential misconduct to appropriate authorities.
- Seek advice from ABB's Intellectual Property counsel before you solicit, negotiate, accept or use intellectual property that is not owned or managed by ABB.
- Do not let a non-ABB entity use or have access to any ABB confidential information or intellectual property without appropriate agreement(s) in place.
- Promptly report any knowledge or suspicion about misappropriation of the ABB brand or other ABB-owned trademarks to ABB's Intellectual Property counsel.
- Familiarize yourself with and follow the processes in place regarding the handling of ABB's or third-party intellectual property and confidential information.
- Comply strictly with intellectual property licenses, obligations and term requirements, including third-party offerings, as in the case of technology, software or images. Ensure that ABB complies with the obligations in such licenses, whether for limited use or commercialization.
- Ensure that an appropriate internal review has taken place before externally publishing technical or company information that may contain the intellectual property of ABB.
- If you suspect that intellectual property belonging to ABB or a third party has been misused or improperly disclosed, you should promptly notify ABB's Legal or Intellectual Property counsel so that prompt remedial action can be taken.

Privacy and personal data

We acknowledge the importance of personal data protection and believe that the principles behind data protection strengthen individual rights. ABB collects, uses, stores, handles, transfers and discloses personal data in accordance with applicable laws and expects suppliers and business partners to do the same. ABB's global standards for safeguarding personal data ensure that ABB provides a high level of protection regardless of where the data is collected or processed.

Keep in mind

- Personal data means any information relating to an identified or identifiable natural person. This may include, but is not limited to: a person's home or office address, email address, phone number, photo, date of birth, banking or payroll information, IP address, mobile device ID, government-issued identification or other similar information.
- Certain categories of personal data must be treated with greater care, including, for example, information about race, ethnicity, sexual orientation, political affiliations, religion, membership in a trade union, physical or mental health data, criminal records and genetic and biometric data.

ABB collects, uses, stores, handles, transfers and discloses personal data in accordance with applicable laws.

- Email and internet communications made through ABB workplaces, networks, devices and service providers may be treated as ABB business information and so may be accessed, retrieved, monitored and disclosed by ABB, subject to applicable legislation and contractual agreements.

Your role

- Only use personal data consistent with the business purpose for which it was collected and only for as long as necessary. Use the minimum personal data you need for a given purpose and do not collect or use data that is not necessary or beyond document retention limits.
- If you transfer personal data, be aware of applicable local regulations. Be careful not to transfer personal data between countries without first understanding the data privacy standards in those countries.
- When collecting and using personal data, be careful to safeguard it against inadvertent disclosure, for example, by leaving data viewable in open spaces, electronic collaboration sites, at a printer, or in or on unsecured computers, devices, desks or cabinets.
- Immediately report security incidents involving personal data or any perceived weakness in ABB's privacy safeguards to the Service Desk (MyIS).
- Be familiar and comply with the relevant ABB privacy, security and data-protection policies and procedures.



“What is our approach to governments, officials and state-owned entities?”

Working with governments

We work with governments, public international organizations and civil society to advocate for policies that enable a more sustainable and resource-efficient future. We seek to demonstrate the value of our products to regulators so that our leading technologies in electrification and automation are available to customers in industries around the world. We often operate under complex rules when selling to and engaging with governments and on projects financed by multilateral development banks or with other government credit or financing institutions, including rules relating to pro-curement, lobbying, gifts, travel, hospitality, record-keeping and disclosure. When working with governments, state-owned enterprises and their representatives, we act transparently, honestly and with high standards of integrity, in accordance with ABB’s internal rules and procedures and all applicable laws.

Keep in mind

- You are responsible for understanding and complying with applicable laws and regulations that apply to dealing with governments. You should be aware that applicable laws and regulations can vary within the country in question (i.e., regional- or state-level laws) and not only from country to country.
- If you need to engage with public officials on behalf of ABB, coordinate first with the Legal & Integrity team and Government Relations and Public Affairs (GRPA). ABB funds, property or services must not be used to make political donations or to support any candidate for political office or political party, official or committee anywhere in the world.
- Governments and state-owned enterprises often have specific, detailed rules governing their procurement and tender processes. You must inform yourself in advance about these rules. Do not deviate from them and seek assistance from the Legal & Integrity team when needed.
- Some common practices in the private sector may not be lawful or appropriate in the government sector or in dealings with state-owned enterprises. Governments impose substantial criminal and civil penalties (as well as potential debarment) for violations of their procurement, ethics, lobbying and related rules.
- There are rules associated with the recruitment of current or former public officials. Follow the relevant ABB policies and procedures before attempting to recruit a public official to work at ABB.

Your role

- Follow the relevant ABB policies and procedures before providing gift, travel and hospitality to a public official or an employee of a state-owned enterprise.
- You must be truthful and accurate in interactions with public officials and observe the highest ethical standards when conducting business with government representatives.
- When making a certification to a public official or agency, always conduct the requisite due diligence to ensure that your certification is accurate, current and complete.
- Avoid making unauthorized deviations or substitutions to the requirements of a government contract – even where, for example, an agency official informally assents to the change. Changes must be strictly and lawfully made pursuant to the terms of the contract.
- Lobbying activities are highly regulated. Work with ABB’s Government Relations and Public Affairs team before seeking to engage with a government or public official for advocacy, policy or relationship reasons.

ABB funds, property or services must not be used to make political donations or support any candidate for political office or political party, official or committee anywhere in the world.

Working with suppliers

We only work with suppliers that share our commitment to integrity, sustainability and human rights and have agreed to meet the requirements set out in our Supplier Code of Conduct. We follow ABB's procurement standards and procedures in qualifying, engaging and managing suppliers. We are committed to a transparent and competitive sourcing process and to dealing fairly and responsibly with our suppliers. We do not accept gifts, business gratuities or anything else of value from suppliers in violation of our policies regarding the receipt of gifts, travel and hospitality.

Keep in mind

- We take prompt action regarding suppliers whose ethical performance is questionable or not in compliance with the ABB Supplier Code of Conduct. Ethical lapses must not be overlooked, ignored or minimized when evaluating the performance of our suppliers.
- Suppliers are required to uphold applicable human rights in their operations, including laws prohibiting child and forced labor, modern slavery and human trafficking, and respecting workers' rights and labor standards.
- Suppliers are required to provide a safe and healthy workplace for their employees and to conduct business in an environmentally sustainable way.
- Suppliers are required to refrain from any and all forms of corruption, extortion and bribery.
- Suppliers are also required to apply the same standards to their own supply chain and to remedy non-compliance in their own operations.
- You should not show favor or preference to any person or business based on anything other than the best interests of ABB. You must not let your business dealings on behalf of the company come into conflict with or be influenced by personal or family interests.

Your role

- All purchases of goods and services for ABB must be made in accordance with our procurement policies and procedures including risk-based, integrity onboarding and monitoring.
- Report promptly to the Legal & Integrity team any warning signal that might suggest an improper payment or business relationship.
- Report promptly to the Legal & Integrity team any health, safety, environmental or security concern, or any human rights violation or matter related to forced, slave or child labor. Do not put yourself or victims of a human rights violation at additional risk by directly confronting those responsible. Always follow ABB reporting procedures to ensure timely and appropriate action is taken.
- Report promptly to the Legal & Integrity team any attempt to pressure you into using a specific supplier or a request to deviate from ABB's procedures when selecting or managing a supplier.
- Be alert to suppliers that make unrealistic claims on pricing or delivery or suggest they can bypass or expedite government clearances (e.g., customs) for the goods or services they offer.
- Do not permit suppliers to offer anything of value to you (outside of what is permitted under our gifts, travel and hospitality procedures) or your relatives in contemplation of potential favorable treatment of any kind. Kickbacks (payments to someone who has illicitly facilitated a transaction) are illegal and in violation of our policies. Report any attempt at a kickback to the Legal & Integrity team.
- Ensure that suppliers you manage or otherwise engage with take prompt and effective remedial actions regarding shortfalls identified in site visits, audits or other inspections.
- Ensure that suppliers and their employees, contractors and temporary workers are aware of ABB's reporting channels as a means to surface concerns or grievances.



We only work with suppliers who share our commitment to integrity, sustainability and human rights and have agreed to meet the requirements set out in our Supplier Code of Conduct.

Raising integrity concerns and non-retaliation



How to raise a concern
Our business and our success are built on the principles of integrity in our Code of Conduct. You must report promptly any suspected or potential violation of the Code so that we can investigate and, if necessary, take appropriate action to address potential issues before they might cause harm to employees, the company or our reputation. We have a collective responsibility on behalf of all our stakeholders to ensure that potential violations of the Code are addressed promptly and thoroughly.

We provide multiple ways for you to report potential violations of the Code of Conduct or of the law to ABB:
- Your manager
- Your Human Resources business partner
- Any member of the Legal & Integrity team
- The Chief Integrity Officer
  - Affolternstrasse 44, 8050 Zurich, Switzerland
- ABB's reporting channels
  - You can report your concerns online or by phone; local numbers are listed on the website for many countries.
- The Chief Executive Officer
- The Board of Directors

You are always free to report potential violations of laws or regulations to the appropriate authorities.

If you choose to remain anonymous, we ask that you provide sufficient detail and factual information so that we can effectively follow up on your concern.

ABB's commitment against retaliation
ABB strives to maintain a culture in which employees and contractors feel free to raise concerns in good faith about potential violations of the Code of Conduct or the law without fear of retaliation or other adverse consequences. Retaliation undermines the culture and tone we must uphold.

Retaliation includes any adverse employment action, such as termination, suspension or demotion; denying overtime, promotion or benefits; failing to give equal consideration in employment decisions; negatively impacting working condi-tions; or creating a hostile or intimidating work environment.

ABB will not condone or tolerate retaliation taken against an employee because they raised a potential integrity concern in good faith or cooperated in an investigation. Disciplinary action, up to and including termination, will be taken against offenders.

Leaders' duties when an employee raises an integrity concern
Employees will often raise integrity concerns directly with their managers. Handling such concerns with appropriate care and sensitivity is one of the principal responsibilities of leaders under our Code of Conduct. If an employee comes to you with an integrity concern, your responsibilities are to listen carefully to the employee's concern, to document it appropriately, and, at the end, to thank the employee for coming forward to raise the concern. You should not express an opinion as to the truth or merits of the employee's concern – even if you personally believe the concern may be unfounded. You should let the employee know that you will promptly forward the concern and the information they provided to the Legal & Integrity team for appropriate follow-up.

Leaders have a special role in our commitment against retaliation and must exercise caution to avoid even a perception of retaliation when a concern is raised or they become aware of an investigation. You should not directly or indirectly reveal to other ABB leaders or employees the identity of anyone who has reported a concern. You should never ask colleagues or members of your team about an investigation (including raising topics that were the subject of an interview), or otherwise act in a manner that could interfere with the investigation in any way. You should also avoid casual discussions about investigation procedures or topics related to the investigation. Even if you do not mention specific issues or individuals, these discussions may set a poor example for employees, erode their perceptions about how ABB treats integrity concerns, and lead to inadvertent or careless leakage of sensitive information which puts the Company at risk.

Your professionalism and sensitivity to these matters contribute directly to creating a culture of integrity where all employees feel comfortable raising integrity concerns.

What happens when a concern is raised?
ABB takes each concern seriously and handles allegations with appropriate confidentiality. The Legal & Integrity team will acknowledge receipt of your concern and review it carefully so that the appropriate follow-up action can be taken promptly.

Your concern will be assigned to an ABB investigator for further assessment and review. The investigator may interview employees and third parties who might be knowledgeable about the matter and review documents that relate to the concern. All ABB employees and contractors have an obligation to cooperate fully and provide complete and truthful information during an integrity investigation, supported by our commitment against retaliation.

If appropriate, the company will take interim corrective actions during the course of the investigation. Once the investigation is complete, and if the concern is substantiated, the case may be reported to an internal disciplinary committee which will decide whether further corrective or disciplinary actions are appropriate.

Corrective action and discipline
An organizational culture that encourages the reporting of concerns in an atmosphere free of fear of retaliation significantly adds to ABB's competitiveness. It enables the opportunity to address potential issues or ineffective processes and controls early, before they become bigger or more widespread problems. In cases where the review of the concern has identified areas of process or controls improvement, the respective business will be assigned the responsibility to implement the necessary and systemic corrective actions to prevent a recurrence. In other cases, it may be appropriate to discipline an individual employee which, subject to local law, may include termination of employment. The level of discipline will depend on several factors as determined by ABB's accountability framework, including, but not limited to:
- The level and seniority of the employee involved
- Whether the employee acted intentionally
- Whether the employee created a legal or financial risk for ABB
- The potential or actual impact of the employee's conduct on ABB's culture and reputation, and on the experiences of others at ABB
- Whether the employee cooperated fully with the investigation and provided complete and truthful information
- Whether the employee acted dishonestly, fraudulently or for personal gain
- Whether the employee's actions represented a repeat or systemic violation or pattern of behavior

Leaders are held to a higher standard and may be held accountable for misconduct by others if they failed to create or uphold the expected culture of integrity.

The responsible investigative team will often summarize and communicate internally high-level investigative findings (without identifying personal information) to provide lessons learned and other integrity training opportunities to employees.

“What do we do now?”

1 Scan the QR-code.
2 Download the ABB Code of Conduct mobile app.

Learn more
For additional information on relevant policies and procedures, consult the ABB Governance Portal.

Your responsibilities under ABB’s Code of Conduct

ABB’s technology, products and services make a major contribution to businesses and communities around the world. However, it is not merely what we do, but how we do it, which sets us apart from our competitors, strengthens our credibility and trust among our stakeholders, and ensures our continued growth and success as an enterprise. The most critical element of how we work is integrity.

Every employee at ABB is expected to read and understand ABB’s Code of Conduct, and must:

- Know how and where to report an integrity concern
- Report promptly all suspected violations of the Code
- Never retaliate against anyone for participating in an integrity investigation or for raising an integrity concern in good faith
- Be honest and fully cooperative when asked to participate in an integrity investigation
- Engage with integrity training in a timely manner

The most critical element of how we work is integrity.

- Understand and be aware of the risks that exist in their organization

The Code of Conduct imposes a high standard of ethical business conduct for all ABB employees. We are individually accountable for our own integrity and must never compromise on ABB’s ethical standards. Leaders in ABB have special responsibilities and obligations under the Code of Conduct and these may not be delegated to others. The following list identifies and clarifies some of the most important responsibilities of leaders at ABB.

Leaders’ responsibilities under the Code of Conduct

- Establish a culture built on integrity and lead with this in mind.
- Provide integrity oversight and be engaged in the governance of your business.
- Know, anticipate and monitor the specific integrity and compliance risks that confront your business or function and ensure that you take appropriate actions to mitigate those risks.
- Create an atmosphere and culture in your organization that encourages, promotes and rewards diversity, inclusion and integrity.
- Ensure that employees in your organization understand why it is important and beneficial to report integrity concerns promptly and that they feel comfortable doing so without fear of retaliation.
- Ensure that your employees are alert to and properly trained on the integrity and compliance risks that confront your business operations.
- Be a visible, accountable and consistent role model for integrity so that your employees know that you will support their ethical business conduct when it matters.
- Communicate with your team regularly on matters of integrity so they feel comfortable discussing integrity and ethics issues with you.
- Hire and promote only those employees who demonstrate high levels of integrity and ethical behavior.
- Know how to manage an integrity concern that an employee might raise with you directly.

Your Legal & Integrity team stands with you to support you in upholding your responsibilities at ABB.