



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

January 7, 2026

Kerry Shannon Burke
Covington & Burling LLP

Re: AbbVie Inc. (the "Company")
Incoming Letter dated January 2, 2026

Dear Kerry Shannon Burke:

This letter is in response to your correspondence concerning the shareholder proposal (the "Proposal") submitted to the Company by Friends Fiduciary Corporation for inclusion in the Company's proxy materials for its upcoming annual meeting of security holders.

The Company represents that it has a reasonable basis to exclude the Proposal. Based solely on that representation, we will not object if the Company excludes the Proposal from its proxy materials.

Copies of all of the correspondence on which this response is based will be made available on our website.

Sincerely,

Division of Corporation Finance
Office of Chief Counsel

cc: Amy Carr
Friends Fiduciary Corporation

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January 2, 2026

By Electronic Submission

Office of Chief Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549

Re: AbbVie Inc. — Shareholder Proposal Submitted by Friends Fiduciary

Ladies and Gentlemen:

On behalf of AbbVie Inc. (the “Company” or “AbbVie”), we are submitting this letter pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), to notify the staff of the Division of Corporation Finance (the “Staff”) that the Company intends to exclude a shareholder proposal (the “Proposal”) submitted by Friends Fiduciary Corporation (the “Proponent”) and co-filers from the proxy materials for its 2026 annual meeting of stockholders (the “Annual Meeting”).¹ A copy of the Proposal is attached as Exhibit A.

In accordance with the Statement Regarding the Division of Corporation Finance’s Role in the Exchange Act Rule 14a-8 Process for the Current Proxy Season released by the Staff on November 17, 2025 (the “Staff Statement”), we request, on behalf of the Company, that the Staff respond to this letter by indicating that it will not object if the Company excludes the Proposal from its proxy materials for the Annual Meeting. In this regard, the Company represents that it

¹ The co-filers, Jessica Wrobel, through her representative, Zevin Asset Management, Kapitalforeningen MP Invest, through its representative AkademikerPension, the Sisters of St. Francis of Philadelphia and the Dominican Sisters of Springfield Illinois, each have designated the Proponent as its representative. Materials submitted by the co-filers have been omitted from this request. The Company will supplementally provide these materials to the Staff upon request.

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has a reasonable basis to exclude the Proposal based on the provisions of Rule 14a-8 and prior published guidance, as described in further detail below.

In accordance with the Staff Statement, we are submitting this letter via the Staff's electronic shareholder proposal submission form. We are simultaneously sending a copy of this letter to the Proponent as notice of the Company's intent to omit the Proposal from its 2026 proxy materials in accordance with Exchange Act Rule 14a-8(j). We take this opportunity to inform the Proponent that a copy of any correspondence it elects to submit to the U.S. Securities and Exchange Commission (the "Commission") or the Staff with respect to the Proposal should be provided concurrently to the Company pursuant to Rule 14a-8(k), and request that a copy also be provided to the undersigned at the address above.

THE PROPOSAL

The proposal sets forth the following resolution to be voted on by stockholders at the Annual Meeting:

RESOLVED, that shareholders of AbbVie Inc. ("AbbVie") urge the board of directors to oversee conduct of human rights due diligence ("HRDD") to produce a human rights impact assessment ("HRIA") identifying actual and potential adverse human rights impacts in AbbVie's operations and supply chain which AbbVie causes or contributes to, including impacts on the right to health. The HRIA should be prepared at reasonable cost and omitting confidential and proprietary information and made available on AbbVie's web site.

BASES FOR EXCLUSION

The Company has a reasonable basis to exclude the Proposal from its 2026 proxy materials pursuant to Rule 14a-8(i)(7) because the Proposal seeks to micromanage the Company. The Company also has a reasonable basis to exclude co-filers Jessica Wrobel (collectively with her representative, Zevin Asset Management, "Zevin") and Kapitalforeningen MP Invest (collectively with its representative, AkademikerPension, "AP") pursuant to Rules 14a-8(b) and 14a-8(f)(1) because both Zevin and AP failed to timely submit sufficient proof of ownership.

ANALYSIS

I. The Company has a reasonable basis to exclude the Proposal under Rule 14a-8(i)(7) because the Proposal seeks to micromanage the Company.

Overview of Rule 14a-8(i)(7) and Micromanagement

Rule 14a-8(i)(7) permits the exclusion of a shareholder proposal from a company's proxy materials if the proposal "deals with a matter relating to the company's ordinary business operations." The Commission has stated that the purpose of the ordinary business exception is "to confine the resolution of ordinary business problems to management and the board of directors, since it is impracticable for shareholders to decide how to solve such problems at an

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annual shareholders meeting.” *Amendments to Rules on Shareholder Proposals*, SEC Rel. No. 34-40018 (May 21, 1998) (the “1998 Release”). The Commission has further stated that the policy underlying this exclusion rests on two “central considerations,” specifically whether the proposal (i) concerns tasks that are “so fundamental to management’s ability to run a company on a day-to-day basis that they could not, as a practical matter, be subject to direct shareholder oversight” or (ii) “seeks to ‘micromanage’ the company by probing too deeply into matters of a complex nature upon which shareholders, as a group, would not be in a position to make an informed judgment.” *Id.* The exclusion of a proposal under Rule 14a-8(i)(7) on micromanagement grounds “may come into play in a number of circumstances, such as where the proposal involves intricate detail, or seeks to impose specific time-frames or methods for implementing complex policies.” *Id.*

The Staff has provided additional guidance on the scope and meaning of micromanagement under Rule 14a-8(i)(7). As noted in Staff Legal Bulletin No. 14K (Oct. 16, 2019) (“SLB 14K”), which was reinstated in relevant part by Staff Legal Bulletin No. 14M (Feb. 12, 2025), the Staff looks “to whether the proposal seeks intricate detail or imposes a specific strategy, method, action, outcome or timeline for addressing an issue, thereby supplanting the judgment of management and the board.” The Staff further explained that “if the method or strategy for implementing the action requested by the proposal is overly prescriptive, thereby potentially limiting the judgment and discretion of the board and management, the proposal may be viewed as micromanaging the company.”²

The Proposal Micromanages the Company

The Proposal seeks to micromanage the Company by probing too deeply into matters of a complex nature upon which the Proponent is not in a position to make an informed judgment. The Proposal mandates that the Company’s board of directors (the “Board”) oversee human rights due diligence (“HRDD”) to produce a human rights impact assessment (“HRIA”), which would involve an assessment of the Company’s operations and supply chain to identify “actual and potential adverse human rights impacts” and “impacts on the right to health.” The Proposal anticipates that such an assessment will be comprehensive in scale and apply to all of the Company’s operations, without limit. The sheer scope and complexity of the HRDD process and production of an HRIA would be a substantial financial and operational undertaking for the Company and would involve the production and disclosure of intricate detail regarding the Company’s operations, supply chain, product prices and access to healthcare and medicines, among other things. Notably, the HRIA contemplated by the Proposal would require the Company to assess these myriad sources of information not only with respect to actual or potential adverse impacts that the Company allegedly causes, but also those to which it contributes in any manner. In this regard, the Proposal would require the Company to effectively guess the human rights impacts to which its operations and supply chain may potentially contribute, untethered by any limiting principle. The Company is not well-positioned

² The micromanagement analysis rests on an evaluation of the manner in which a proposal seeks to address the subject matter raised and the analysis under Rule 14a-8(i)(7) is independent of whether the proposal is cast as precatory. The Staff noted in SLB 14K that “the precatory nature of a proposal does not bear on the degree to which a proposal micromanages,” and exclusion under Rule 14a-8(i)(7) may be appropriate regardless of the precatory nature of the proposal in question.

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to conduct such a “butterfly effect” assessment, much less the Proponent or stockholders generally. Such complex and detailed matters are squarely within the purview of the Board and management and are not proper subjects for the Proponent’s oversight or stockholder approval at an annual meeting. The Company, therefore, has a reasonable basis to exclude the proposal under Rule 14a-8(i)(7).

The Company’s exclusion of the Proposal on micromanagement grounds is consistent with the Staff’s recent decision in *Eli Lilly and Co.* (Mar. 17, 2025), where the Staff permitted the exclusion of a similar proposal that urged the board of directors to oversee the conduct of HRDD to produce an HRIA. Similar to the Proposal, the *Eli Lilly* proposal required the company to conduct a wide-ranging assessment of human rights matters, including with respect to the *company’s* operations, activities, business relationships, and products, including access to medicines. The Staff determined that the proposal sought to micromanage the company, and it was excludable under Rule 14a-8(i)(7). The Proposal micromanages the Company in the same manner as the *Eli Lilly* proposal, but does so to a greater extent by requiring an assessment of the Company’s contributions to impacts caused by third parties, including those with which the Company does not have a direct relationship. The Company accordingly has a reasonable basis to exclude the Proposal.

The Staff also determined in *Amazon.com, Inc.* (Apr. 3, 2019) that a proposal urging the company to “commit to conducting and making available to shareholders human rights impact assessments for at least three food products the [c]ompany sells that present a high risk of adverse human rights impacts” micromanaged the company by seeking to impose specific methods for implementing complex policies in place of the ongoing judgments of management. The company noted that it had already “undertaken numerous initiatives to address this issue in ways that the [c]ompany believes are best for its customers, its business, people involved in the supply chain, and the planet.” The *Amazon* proposal’s call for HRIAs when the company had already developed its own initiatives to address the subject matter of the proposal mirrors the Proposal’s call for an HRIA when the Company has already developed practices and procedures to address human rights matters. As noted in the Proposal, the Company is committed to human rights and has publicly described its positions and policies, including in a Commitment to Human Rights³ and a Commitment to Access to Medicines.⁴ These documents outline the Company’s approach to supply chain matters, pricing and access to healthcare from a human rights perspective. These commitments have been carefully designed by management to reflect the Company’s goals, business strategy and other factors. The Proponent is not qualified to direct the Company on how to best effect its human rights-related commitments, especially when those commitments are intertwined with the Company’s goals and strategy, concern ordinary business matters such as the Company’s products and supply chains and implicate complex and transnational legal and regulatory requirements and the Company’s policies and processes for complying with such requirements. By requiring the Board to initiate and oversee an HRDD process and the production and publication of an HRIA, the Proposal impermissibly seeks to micromanage the Company’s human rights strategy and related ordinary business

³ <https://www.abbvie.com/content/dam/abbvie-com2/pdfs/about/our-commitment-to-human-rights.pdf>

⁴ <https://www.abbvie.com/content/dam/abbvie-com2/pdfs/about/pricing-and-access-of-our-innovative-medicines.pdf>

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matters, including those described in the Commitment to Human Rights and Commitment to Access to Medicines, and accordingly, the Company has a reasonable basis to exclude it.

The Staff also recently determined that proposals that call for a detailed study, policy or plan were excludable on the basis of micromanagement. *See e.g., AT&T Inc.* (Mar. 24, 2025) (proposal that requested the company to undertake a comprehensive independent study and publicly release an independent report to demonstrate that the company assessed all potential hazards related to lead-sheathed cables required the company to include in the study a comprehensive mapping of the locations impacted, and conclusions on the potential costs of remediation, along with the most responsible and cost-effective ways to prioritize remediating sites posing a risk to public health); *Ford Motor Co.* (Mar. 19, 2025) (proposal that concerned the adoption and disclosure of a noninterference policy committing to uphold the human rights of freedom of association and collective bargaining required that the policy make specific commitments as outlined in the proposal); *Domino's Pizza, Inc.* (Mar. 11, 2025) (proposal that requested a climate transition action plan required that the plan go above and beyond existing disclosure, describing how the plan intended to align the company's operations and full value chain emissions with the company's climate ambitions and further contemplated that the company would implement the plan as specifically outlined in the proposal). The HRDD contemplated by the Proposal contemplates an impermissibly detailed assessment. For example, the Proposal refers to the UN's Guiding Principles on Business and Human Rights ("UNGPs") and anticipates that the HRDD process will align with the UNGPs. As described in UNGP Principle 17, the HRDD process is expansive and involves assessing actual and potential human rights impacts, integrating and acting on those findings, tracking responses and communicating how impacts are addressed.⁵ Principle 17 also states that the HRDD process "should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships" and should be "ongoing, recognizing that the human rights risks may change over time as the business enterprise's operations and operating context evolve." Additionally, to oversee the conduct of HRDD in line with the UNGPs, the Board and Company would need to, among other things: engage experts and consult with stakeholders (Principle 18); integrate findings from the HRIA (or other assessments under the HRDD process) into the Company's business with the appropriate "budget allocation[]" (Principle 19); track the effectiveness of Company actions on an ongoing basis based on "qualitative and quantitative indicators" (Principle 20); and develop a communications strategy and provide information (including through meetings and formal reports) that enable outside parties to assess how the Company is addressing human rights impacts (Principle 21). The Proposal attempts to dictate the content of both the HRDD process, by requiring that it enable the Company to "identify human rights impacts of its own operations, such as harmful pricing practices and shortcomings in access programs," and the HRIA, by requiring that it specifically address the Company's operations and supply chain. All of these requirements are highly prescriptive, inappropriately limit the Board and management's discretion with respect to such matters, including with respect to the selection of an appropriate reporting framework, and clearly seek to micromanage the Company's processes related to compliance with human rights standards. The Proposal would inappropriately supplant and limit management's discretion with respect to the

⁵ https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

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Company's human rights-related processes and the Board's oversight of these matters, and the Company therefore has a reasonable basis to exclude it.

The Proposal can be distinguished from *General Dynamics Corp.* (Mar. 25, 2025), where the Staff did not permit exclusion on micromanagement grounds for a proposal that requested an HRIA with regard to certain company products and services. Unlike the Proposal or the *Eli Lilly* proposal, the *General Dynamics* proposal was narrower in scope, did not mandate any HRDD process and did not direct that the HRIA cover the company's operations and supply chain. It also did not require reporting to the extent the company's conduct is believed to "contribute[]" to human rights impacts associated with these topics. As noted above, the HRDD process is onerous and complex and is a key element of the Proposal; the *General Dynamics* proposal did not require the company to develop, undertake and maintain an HRDD process, as is the case with the Proposal. Furthermore, the proposal in *General Dynamics* was focused solely on the company's direct human rights impacts and not those that it may theoretically or indirectly contribute to, as is the case with the Proposal. The Proposal micromanages the Company by probing too deeply into matters of a complex nature upon which the Proponent is not in a position to make an informed judgment and limits management's discretion with regard to these matters, which provides the Company with a reasonable basis for excluding it from its proxy statement.

II. The Company has a reasonable basis to exclude Zevin and AP as co-filers of the Proposal under Rules 14a-8(b) and 14a-8(f)(1) because they failed to timely submit sufficient proof of ownership.

Background

The Company received a co-filed Proposal and cover letter from (i) Zevin on November 20, 2025 (the "Zevin Letter") and (ii) AP on November 24, 2025 (the "AP Letter" and collectively with the Zevin Letter, the "Co-Filer Letters"). Both Co-Filer Letters failed to meet requirements outlined in Rule 14a-8(b). The Zevin Letter did not provide (i) any proof of ownership or (ii) written documentation authorizing the named representative to act on the proponent's behalf. The AP Letter only provided as proof of ownership what appeared to be account statements and a letter signed by the proponent. The Company previously reviewed its records and confirmed that neither proponent was a record holder of the Company's common stock.

On December 2, 2025, the Company sent separate letters to Zevin (the "Zevin Deficiency Notice") and AP (the "AP Deficiency Notice" and collectively with the Zevin Deficiency Notice, the "Deficiency Notices") providing notice of procedural deficiencies as required by Rule 14a-8(f) within 14 days of the respective date on which the Company received the Co-Filer Letters. The Deficiency Notices informed Zevin and AP of the requirements of Rule 14a-8 and explained how they could cure their respective procedural deficiencies.

On December 3, 2025, both Zevin and AP responded to their respective Deficiency Notices. Zevin provided a compliant authorization letter, but did not provide adequate proof of ownership because the letter did not verify continuous ownership for the one-year period ending on the date of the submission of the Proposal; the letter instead covered the one-year period ending on the day after the submission of the Proposal. AP responded by providing the same

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account statements and a “confirmation of holdings” letter that it signed, but failed to provide a letter from a record holder attesting to AP’s satisfaction of the ownership criteria of Rule 14a-8(b)(2). As of the date of this letter, the Company has not received any additional evidentiary information from either Zevin or AP.

Rule 14a-8 provides clear, objective criteria for the procedural requirements related to shareholder proposals and the Staff has issued extensive guidance through Staff Legal Bulletins and no-action letters regarding its strict construction of the procedural requirements for the submission of a valid shareholder proposal. Specifically, the Staff has consistently concurred in the exclusion of shareholder proposals under Rule 14a-8(f)(1) where the proponent, such as Zevin, failed to provide proof of continuous ownership verifying that the proponent continuously held the requisite amount of securities for the required time period at the time the proposal was submitted. *See, e.g., Cheniere Energy, Inc.* (Apr. 7, 2022) (concurring in the exclusion of a proposal where the proponent submitted a letter from the record holder verifying its ownership as of August 3, 2021, which was silent regarding the proponent’s continuous ownership for the applicable period in connection with a proposal dated July 13, 2021); *JetBlue Airways Corp.* (Jan. 4, 2017) (concurring in the exclusion of a proposal where the proponent provided a letter from the record holder verifying the proponent’s ownership from December 17, 2015 to November 29, 2016, which failed to demonstrate the proponent’s continuous ownership for the applicable period in connection with a proposal dated October 20, 2016); *Bank of America Corp.* (Jan. 16, 2013) (concurring in the exclusion of a proposal where the proponent provided letters from broker stating ownership from November 30, 2011 to December 7, 2012, which failed to demonstrate the proponent’s continuous ownership for a proposal dated November 19, 2012); *Comcast Corp.* (Mar. 26, 2012) (concurring in the exclusion of a proposal where the proponent provided letter from broker stating ownership for one year as of November 23, 2011, which failed to demonstrate continuous ownership for a proposal dated November 30, 2011). In addition, in Staff Legal Bulletin No. 14 the Staff explicitly stated that a proponent, such as AP, must submit “an affirmative written statement from the record holder of his or her securities,” and that monthly, quarterly or other periodic investment statements would not demonstrate sufficiently continuous ownership of the securities. *See* Section C.1.c(2) of Staff Legal Bulletin No. 14 (Jul. 13, 2001) (“SLB No. 14”). The staff has consistently permitted the exclusion of proposals that have provided account information rather than a valid broker letter. *See, e.g., NextEra Energy, Inc.* (Feb. 15, 2023) (permitting exclusion under Rule 14a-8(f) where the proponent submitted a broker letter attaching trade confirmations, other account statements and website screenshots); *The Walt Disney Co.* (Sept. 28, 2021) (permitting exclusion under Rule 14a-8(f) where the proponent submitted a screenshot of a webpage from his brokerage account and failed to provide evidence that it satisfied the eligibility requirements of Rule 14a-8(b) within 14 days of receipt of the company’s request for sufficient documentary support); *Churchill Downs Inc.* (Feb. 1, 2021) (permitting exclusion of a shareholder proposal where the proponent provided monthly brokerage account statements); *FedEx Corp.* (June 28, 2018) (permitting exclusion where the proponent delivered an account statement, trade confirmation and a spreadsheet purporting to reflect the proponent’s holdings); *PepsiCo, Inc.* (Jan. 20, 2016) (permitting exclusion where the proponent provided an account statement); *International Business Machines Corp.* (Jan. 31, 2014) (permitting exclusion where the proponent provided a “Security Record and Position Report”); *Yahoo! Inc.* (Mar. 29, 2007) (permitting exclusion of proposal under Rule 14a-8(f) where proponent provided trade confirmations from its broker, email correspondence, account statements and website

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printouts). The Company provided Zevin and AP with the Deficiency Notices, which explained the procedural requirements of Rule 14a-8(b) in a manner consistent with Rule 14a-8(f) and various Staff Legal Bulletins. Because Zevin and AP have failed to resolve the deficiencies in their respective Deficiency Notices within the required 14-day period of Rule 14a-8(f), the Company has a reasonable basis to exclude them as co-filers of the Proposal.

CONCLUSION

The Company has a reasonable basis to exclude the Proposal from its 2026 proxy materials pursuant to Rule 14a-8(i)(7) because the Proposal seeks to micromanage the Company. The Company also has a reasonable basis to exclude Zevin and AP as co-filers pursuant to Rules 14a-8(b) and 14a-8(f)(1), because both entities failed to timely submit sufficient proof of ownership. In addition, the Company believes it has other reasonable bases for excluding the Proposal and may assert these grounds at a later date.

In accordance with the Staff Statement, we request, on behalf of the Company, that the Staff respond to this letter by indicating that it will not object if the Company excludes the Proposal from its proxy materials for the Annual Meeting.

* * * * *

If the Staff has any questions regarding this request or requires additional information, please contact me at (202) 662-5297.

Very truly yours,



Kerry Shannon Burke

cc: Ian Smith
Senior Associate General Counsel
AbbVie Inc.

Ethan Birchard
Friends Fiduciary Corporation

Exhibit A

RESOLVED, that shareholders of AbbVie Inc. (“AbbVie”) urge the board of directors to oversee conduct of human rights due diligence (“HRDD”) to produce a human rights impact assessment (“HRIA”) identifying actual and potential adverse human rights impacts in AbbVie’s operations and supply chain which AbbVie causes or contributes to, including impacts on the right to health. The HRIA should be prepared at reasonable cost and omitting confidential and proprietary information and made available on AbbVie’s web site.

Supporting Statement

The right to health is a fundamental human right. Article 12.1 of the International Covenant on Economic, Social, and Cultural Rights “recognize[s] the right of everyone to the enjoyment of the highest attainable standard of physical and mental health.”¹ Access to medicines is a key element of the right to health. Target 3.8 of United Nations Sustainable Development Goal 3 assesses progress toward “access to safe, effective, quality and affordable essential medicines and vaccines for all.”²

AbbVie has adopted “Our Commitment to Human Rights” (the “Commitment”), which includes respecting the human rights of clinical trials participants and supporting “access to quality and affordable medicines.”³ The Commitment also says that AbbVie supports “key tenets of the United Nations Guiding Principles on Business and Human Rights” (the “UNGPs”).

The UNGPs state that to satisfy their obligation to respect human rights, companies should establish an HRDD process to identify, prevent, mitigate and remedy human rights impacts. AbbVie does not appear to have established such a process. The Commitment states that AbbVie “surveys and measures our most critical suppliers on their environmental and social practices, including criteria related to human rights,”⁴ which suggests that it is relying at least in part on self-reported data. As for its own operations, under which the right to health would fall, the Commitment mentions no process used by AbbVie to identify human rights impacts, beyond an ethics and compliance hotline.

Some of AbbVie’s actions appear to undermine its commitment to promoting access to medicines. A case brought by a Dutch organization claiming that AbbVie’s overcharging the Dutch healthcare system for Humira violated the human right to health was permitted to proceed by a Dutch court.⁵ Despite being dismissed on procedural grounds in July 2025, the court made no ruling on the substance or merits of the case.⁶ In the U.S., AbbVie has been accused of using a variety of anticompetitive practices to raise prices for two lucrative drugs.⁷

¹ www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights; <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7605313/>

²

www.un.org/en/development/desa/population/migration/generalassembly/docs/globalcompact/A_RES_70_1_E.pdf

³ <https://www.abbvie.com/content/dam/abbvie-com2/pdfs/about/our-commitment-to-human-rights.pdf>, at 2

⁴ <https://www.abbvie.com/content/dam/abbvie-com2/pdfs/about/our-commitment-to-human-rights.pdf>, at 3

⁵ [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(24\)01545-9/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(24)01545-9/fulltext)

⁶ <https://www.pharmaceuticalaccountability.org/2025/07/09/amsterdam-court-gives-no-substantive-ruling-in-pharmaceutical-accountability-foundation-abbvie-excessive-pricing-case-on-humira/>

⁷ <https://www.nbcnews.com/politics/congress/pharmaceutical-company-abbvie-inflated-prices-two-major-drugs-house-oversight-n1267591>; <https://www.i-mak.org/wp-content/uploads/2020/10/i-mak.humira.report.3.final-REVISED-2020-10-06.pdf>

Comprehensive HRDD that includes access to medicines would enable AbbVie to identify human rights impacts of its own operations, such as harmful pricing practices and shortcomings in access programs. According to Deloitte, it is not possible for a company to “really commit to respecting and promoting human rights without having full transparency of its human rights impacts.”⁸ Publicly releasing the resulting HRIA would allow shareholders to assess AbbVie’s human rights performance.

⁸ <https://www.deloitte.com/global/en/services/risk-advisory/blogs/human-rights-due-diligence-in-the-modern-era.html>