Medtronic strives to conduct its activities in a manner that reflects its Mission and Code of Conduct – which includes being a good corporate citizen, dealing fairly in business, behaving ethically, upholding human rights, supporting a safe and healthy workplace, doing business in an environmentally responsible manner, and complying with applicable law. We’re committed to ensuring that our suppliers reflect our values and beliefs by conducting business in ways that are consistent with Medtronic’s applicable policies and practices.

Reporting entity

This statement is for our financial year ending 24 April 2020, and has been approved by the Board of Directors on 16 November 2020, for Medtronic Australasia Pty Ltd ACN 001 162 661 of 2 Alma Road, Macquarie Park, New South Wales, 2113.

Our operations

Medtronic Australasia is a distributor of medical devices and services in the Australian Market. It is an Australian Private Company and is ultimately owned by Medtronic PLC. Its main brand names are ‘Medtronic’, ‘MiniMed’ and ‘Covidien’, with a few retail pharmacy products branded ‘Surgipack’ and ‘Body Plus’.

Established in 1973, Medtronic Australasia now employs more than 800 staff. Medtronic Australasia’s headquarters are in Macquarie Park, in the northwest of Sydney, Australia. We have hubs in Melbourne, Brisbane, Adelaide, Perth and Auckland.

Supply chain

The products marketed and distributed by Medtronic Australasia into the Australian Market are sourced from over 80 of Medtronic PLC’s manufacturing sites around the globe, concentrated in the USA and European Union, complemented by and a small number of regional suppliers specific to Medtronic Australasia, located in China, Taiwan, Thailand and Japan. Medtronic PLC procures materials and services from 68,162 suppliers across 138 countries – refer to the Medtronic Integrated Performance Report.

Medtronic Australasia also procures/consumes a number of goods and services that are not resupplied to customers, but which are required by its internal stakeholders to support its effective operations. These are mainly local companies and include IT, marketing, logistics, travel management, HR, and MRO.

Medtronic Australasia is in the process of consolidating its suppliers, in order to ensure better oversight and relationship management.

Risks of Modern Slavery practices and actions taken to address the risks

In order to address any potential Modern Slavery risks, including those in countries with known human rights issues, Medtronic globally has a Supply Management framework in place to ensure that high risk product suppliers are identified by evaluating and addressing risks of human trafficking and slavery, through the following efforts:

- **Verifying** certain product suppliers by evaluating and addressing risks of human trafficking and slavery through the following mechanisms:
  - Publishing the Global Supplier Standards that set expectations for Medtronic suppliers’ social, environmental and business conduct;
  - Adopting the Global Human Rights and Labor Standards Policy that prohibits the use of slavery and human trafficking in Medtronic and supplier facilities;
Adopting the Global Anti-Human Trafficking and Forced Labor Policy that reinforces the company’s commitment to prohibit the use of human trafficking, slavery, and forced labor in Medtronic and supplier facilities. (Policy available in Global Human Rights Program Report);

Establishing Medtronic’s Global Supplier Standards Compliance program to monitor and verify certain suppliers’ compliance with Medtronic Standards through desk-top and on-site audits.

Requiring certain suppliers to certify that they comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business through, for example:

- Incorporating social responsibility and environmental criteria in its supplier selection and management processes. The Global Supplier Standards, for instance, have been included in purchase order terms and conditions as well as certain supplier agreements;
- Requiring certain suppliers to adhere to all applicable laws relating to labor, environmental, health/safety and ethics, and by way of example and without limitation, Medtronic’s Code of Conduct, Global Human Rights and Labor Standards Policy.

Maintaining internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking through, for example:

- Establishing the Global Human Rights Program that is aligned with Medtronic’s Mission and in response to issues that are material to the company and its key stakeholders. The program addresses human rights and labor standards issues, risks, and performance in Medtronic’s operations;
- Establishing the cross-functional Human Rights and Labor Standards Council, which serves as a forum for addressing human rights and labor standards issues, risks and performance in company operations and through certain suppliers;
- Requiring all employees to adhere to all applicable laws relating to labor, environmental, health/safety and ethics, and by way of example and without limitation, Medtronic’s Code of Conduct, Global Human Rights and Labor Standards Policy.

Requiring comprehensive Responsible Supply Management awareness training for employees with direct responsibilities for supplier selection and management. This training includes, for example:

- An overview of potential human rights and labor standards issues;
- The details of the Global Supplier Standards and supplier compliance requirements;
- Supplier selection and management best practices.

In addition to the abovementioned efforts, in the past year Medtronic Australasia conducted a number of audits with certain direct suppliers and was satisfied that the risk of Modern Slavery is low in its direct supplier base.

For any questions or concerns regarding Medtronic Australasia’s efforts with regard to Modern Slavery risks, please email rs.retailprocurementanz@medtronic.com.

Signed:

Liz Carnabuci
Vice President, Managing Director ANZ
Medtronic Australasia Pty Ltd