GLOBAL HUMAN RIGHTS PROGRAM
As outlined in our Global Human Rights and Labor Standards Policy, Medtronic strives to conduct its business in a manner that demonstrates a respect for internationally-recognized human rights and the dignity of all people.
PROGRAM RESPONSIBILITY
Within Human Resources, Medtronic has established a Global Human Rights Program. This program is responsible for:

- Establishing and communicating human rights policies
- Assessing Risk - Identify and prioritize internal facilities based on risk. Assess risk based on: type of work performed, country laws, enforcement of laws, and other factors. Conduct audits of internal facilities.
- Monitoring - Develop operational controls. Monitor effectiveness of operational controls.
- Reporting - Share results with appropriate leadership. Support customer/social audits

INTERNAL ASSESSMENTS
Medtronic’s Global Human Rights Program annually conducts assessments of its internal operations facilities. These facilities are assessed for various human rights issues including the following: child labor, fair treatment, forced labor, freedom of association, health and safety, involuntary labor, and remuneration. The program has identified certain groups particularly vulnerable to human rights abuses, including: children, foreign and domestic migrant workers, poorly educated, women and ethnic minorities (which varies based on location). This internal assessment is the first step in the Global Human Rights Program Lifecycle.

(Lifecycle detailed on page 4)

Facilities are assessed with a focus on the internal facility itself, as well as the country in which the facility is located. Based on the information gathered during the assessment of the facility and the country, the facility is given one of nine distinct risk scores.
The score on the left is based on the information received from the assessment of the internal facility, and the score on the right is based on the information gathered on the assessment of the country (Labor Standards Status Review). For example, a score of Low/Med would mean the internal Medtronic facility was determined to be low risk, but the country in which the facility is located was determined to be a medium risk.

**FY18 SNAPSHOT**

- **61 Facilities Assessed**
- **100% of assessed facilities received internal score of “Low”**

Assessed Facility Breakdown:
28% Low/Low - 66% Low/Med - 6% Low/High

**FY19 SNAPSHOT**

- **61 Facilities Assessed**
- **100% of assessed facilities received internal score of “Low”**

Assessed Facility Breakdown:
36% Low/Low - 56% Low/Med - 8% Low/High
Global Human Rights Program Lifecycle - Is the strategy used by the Global Human Rights Program to assess our internal operations facilities. Each stage in the lifecycle corresponds to a different quarter within Medtronic’s fiscal year. This process is repeated on an annual basis.

Labor Standards Status Review/Survey - The Labor Standards Status Review is an annual analysis of the laws and enforcement of the laws for the country a facility is located in. The Survey is the assessment of potential risks of the internal Medtronic facility, conducted with the HR leadership for the site. The facility is assessed based on the nature of the work, policies, and enforcement of policies.

Audit - The Audit is the process by which the information gathered during the Labor Standards Status Review and Survey is assessed to determine the overall risk score for a facility. A facility can receive one of nine distinct risk scores. The score on the left corresponds to the information received from the survey of the internal facility, and the score on the right corresponds to the information gathered on the country analysis (LSSR).

Operational Controls - Based on a facility’s risk score, Operational Controls will be put in place to reduce/mitigate potential risks. All assessed facilities, regardless of risk score receive operational controls. Operational Controls have included: new policy development, existing policy updates, training and awareness regarding human rights, and scheduling of an on-site audit.

Monitoring Improvement - The Operational Controls that were put in place will be reviewed to make sure they are being fully implemented and are having the desired impact.
1. Facilities in scope for assessment are determined.
2. Site leads for identified facilities are contacted to setup meeting.
3. Meeting with site lead is held to give an overview of the program (includes a recap of previous year, and goals for upcoming FY) and complete the site assessment survey.
4. Incorporate the survey responses into the centralized database.
5. Assign risk scores to individual questions responses.
6. Total the individual questions scores to create the first half of the facilities risk score.
7. Complete the Labor Standards Status Review (LSSR) for the country in which the facility operates.
8. Assign risk scores to individual questions.
9. Total the individual risk scores to create the second half of the facilities risk score. The completed LSSR will be evaluated and risk status determined as High, Medium, or Low.
10. The ranking for the LSSR and the Survey will be combined to create an Overall Ranking of:
   - Low/Low, Low/Med, Low/High, Med/Low, Med/Med, Med/High, High/Low, High/Med, or High/High
   a. An Overall Ranking of High/Low, High/Med, or High/High will result in escalation to the Emergency Review Board:
      i. Site lead and HR Ops leader are contacted with the request to mitigate the issue(s) within a given time (to be determined for each situation)
         1. If facility satisfies the requirement, they will be upgraded to Medium Risk (for the internal ranking) and surveyed again in 12 months
         2. If facility fails to rectify the issue, the HR Emergency Review Board will be notified, and necessary actions will be taken
   b. An Overall Ranking of Med/Low, Med/Med, or Med/High will require that the following steps are taken:
      i. Remediation plan is developed and delivered to facility site lead
      ii. Facility corrective action is monitored and verified for on time completion
         1. If the issue is corrected on time, facility is upgraded to Low Risk (for the internal Ranking) and surveyed again in 12 months
         2. If the issue is not resolved on time, the facility is reported to the HR Emergency Review Board for resolution (see process above)
   c. An Overall Ranking of Low/Low, Low/Med, or Low/High will result in operational controls to mitigate against potential future risk and will require surveying the facility again in 12 months.
11. The operational controls that are put in place to reduce or mitigate risk are monitored to ensure their implementation and that they are having the desired positive impact.
12. At the end of the cycle the results for the FY are archived and the process is repeated.
13. If a Human Rights complaint is received through Medtronic’s Voice Your Concern reporting line and the claim is substantiated the internal analysis for the facility will be re-evaluated and a new Overall Risk Score will be assigned. The assessment process will be completed based on the new score.

**DEFINITION**

HR Emergency Review Board: The HR Emergency Review Board will consist of: VP Global Employee and Labor Relations and HR Compliance, Director of HR Compliance, Sr HR Program Manager Global HR Compliance Programs, Global HR Compliance Programs Specialists, VP HR Operations (Impacted Business Unit and/or Region)
GLOBAL HUMAN RIGHTS AND LABOR STANDARDS POLICY

**Purpose**
This policy reflects Medtronic’s Mission to contribute to human welfare and to recognize the personal worth of employees. This policy requires our employees to respect internationally-recognized human rights consistent with this policy and Medtronic’s expectation that suppliers also respect internationally-recognized human rights consistent with this policy. In cases where a national law conflicts with internationally recognized human rights, Medtronic will, while complying with the law, seek to respect the human rights labor standards that have been established by law and internationally recognized organizations.

**Scope**
This policy applies to all Medtronic locations, personnel, suppliers, service providers, and business partners.

**Policy Statement (Details)**
This policy establishes requirements for global conduct related to human rights and labor standards. This policy is informed by internationally-recognized instruments setting forth human rights and labor standards to continue to enhance our respect for human rights and labor standards and to improve the conditions of our operations and to reflect our social responsibility.

**Human Rights**
Medtronic strives to conduct its business in a manner that demonstrates a respect for internationally-recognized human rights and the dignity of all people. This means that Medtronic will operate its business with the following values:

- **Diversity and Inclusion**

- **Fair Treatment**
  - Medtronic’s Global Harassment and Other Forms of Offensive Behavior Policy addresses the rules and guidelines that have been implemented to provide a workplace that is free from harassment and discrimination of any kind.

- **Freedom from Forced Labor**
  - Medtronic will not use or engage in any form of coerced, bonded, indentured, or prison labor. All work will be voluntary and employees will be free to leave or terminate their employment without fear of physical, psychological, sexual, or verbal abuse.
  - Medtronic prohibits the use of slavery and human trafficking in Medtronic facilities and by suppliers in Medtronic’s supply chain.

- **Free of Child Labor**
  - Medtronic does not allow child labor in its operations. The term “child” is defined below in the abbreviations, acronyms, and definition section.

- **Fair Compensation**
  - Medtronic complies with all applicable minimum wage, overtime, and maximum hour rules that are established by laws and regulations in the operating regions.

- **Freedom of Association**
  - Medtronic respects the freedom of association. Where our employees wish to be represented by trade unions, we will cooperate in good faith with the bodies that our employees collectively choose to represent them within the appropriate national legal frameworks.

Medtronic is committed to complying with all applicable national and local laws, rules, and regulations in the countries in which it operates.
GLOBAL HUMAN RIGHTS AND LABOR STANDARDS POLICY

Compliance and Training
This policy will be communicated to all employees and will be available publically. Medtronic has defined a process as a part of the Responsible Supply Management program to review our external supply chain's labor standards to assess if they are consistent with this policy and will address any violations appropriately. Human Resources Compliance has defined a process to review Medtronic's internal facilities to assess if they are consistent with this policy. Employees are required to complete yearly training on Medtronic's Code of Conduct, which references this policy.

This policy references various resources including existing Medtronic policies, international labor organizations, and governing bodies; further information is available in the references section below.

This policy is subject to the review schedule and governance that is outlined in the Global Policy on Policies.

Procedures
None

Roles and Responsibilities

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| Employees          | • Complete yearly Code of Conduct training requirements  
|                    | • Report any violations of this policy to your manager or supervisor, Human Resources representative, or by following the steps on: voiceyourconcernline.com |
| Human Resources    | • Assist employees that report any violations of this policy  
|                    | • Support compliance of this policy |

Abbreviations, Acronyms and Definitions

Child - refers to any person under the minimum legal age for employment under applicable law where the work is performed and, as applicable, the type of work being performed.

References & Related Policies

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FAQs
None.

Policy Contacts

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Appendices
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GLOBAL ANTI-HUMAN
TRAFFICKING AND FORCED
LABOR POLICY

Purpose
Medtronic’s Global Human Rights and Labor Standards Policy outlines Medtronic’s commitment to a work environment that is free from human trafficking, slavery, unlawful child labor, and forced labor of any kind. The purpose of this policy is to reinforce that commitment so that everyone who works at or with Medtronic is treated with dignity and respect, reflecting Medtronic’s Mission to contribute to human welfare and to recognize the personal worth of employees.

Scope
This policy applies to all Medtronic locations across the world, all Medtronic personnel, and any third-party labor agencies providing services to Medtronic. Medtronic will strive to ensure that its suppliers adhere to the minimum standards that are outlined within this policy.

Policy Statement (Details)
Medtronic strictly prohibits human trafficking and forced labor. Human trafficking and forced labor are serious violations of fundamental human rights, labor rights, and a violation of law and international labor standards.

Human trafficking and forced labor can happen to people of any race, age, gender, or nationality in all types of businesses and industries in any country in the world. Everyone subject to this policy must understand the warning signs of human trafficking and/or forced labor.

This policy strictly prohibits:
- **Misleading or fraudulent recruitment practices including recruitment fees** - Applicants will not pay any amount of money or fees during any phase of the recruitment process to secure a job with Medtronic. Entities who contract with Medtronic may not charge their clients to work at Medtronic.
- **Withholding identity or immigration documents** - Applicant’s or worker’s passports, residency or work permits, or other personal documents, will not be withheld for any reason unless required by law. In the event that personal documents are held by the employer due to legal requirements, they must be returned immediately upon the employee’s demand without preconditions.
- **Harsh or inhumane treatment** - Medtronic does not tolerate the use of intimidation and violence in the workplace to coerce persons to do work.
- **Unfair or illegal deductions from wages** - Wages must be specified in writing and must meet legal minimum wage requirements in the country of employment and paid in full transparency. Wages cannot be deferred or withheld to bind workers to employment; deductions cannot be made to recoup recruiting costs.
- **Restriction on freedom of movement** - Reasonable freedom of movement within work and living environments must be provided. Migrant workers are free to return to their home country during paid leave without threat of termination.

Any Medtronic employee that knowingly engages in any of these prohibited activities, or any management employee who is aware of these activities occurring and fails to report it, is subject to disciplinary action, up to and including termination of employment.

Due Diligence Process
Medtronic has established a cross functional team that includes Human Resources, Responsible Supply Management, Environmental Health and Safety and Sustainability, Legal, and representatives from each
GLOBAL ANTI-HUMAN TRAFFICKING AND FORCED LABOR POLICY

This document is electronically controlled. Printed copies are considered uncontrolled.

This team monitors internal and external compliance with this policy by surveying and collecting data from internal facilities, contract manufacturers, and suppliers.

Suspected violations of this policy may be reported to Medtronic Legal or, anonymously, to the Voice Your Concern line. Medtronic prohibits retaliation for reporting suspected violations of this policy.

Medtronic is committed to complying with all applicable national and local laws, rules, and regulations in the countries in which it operates.

This policy references various resources including existing Medtronic policies, international labor organizations, and governing bodies; further information is available in the references section below.

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Abbreviations, Acronyms and Definitions

**Forced labor** - all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

**Human Trafficking** - is also called modern slavery and involves the use of force, fraud, or coercion to obtain some type of labor.

**Third-party labor agencies** - any agency or vendor that provides temporary or permanent labor to Medtronic.

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Global Human Rights and Labor Standards Policy

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