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 conducts annual assessments of its internal operations facilities, and triennial assessments of its commercial 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 a risk score.
FY19 Risk Scores
1. Low/Low
2. Low/Med
3. Low/High
4. Med/Low
5. Med/Med
6. Med/High
7. High/Low
8. High/Med
9. High/High

FY20 Risk Scores
Low
Medium
High

FY19
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.

FY20
The singular risk score takes into account the known human rights and labor standards information that is documented regarding the country in which the facility is located, as well as an assessment of the internal facility.

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

FY20 SNAPSHOT
121 Facilities Assessed
Manufacturing Facility Breakdown: (65 locations)
68% Low - 32% Medium - 0% High
Commercial Facility Breakdown: (56 locations)
100% Low - 0% Medium - 0% High
Global Human Rights Program Lifecycle - Is the strategy used by the Global Human Rights Program to assess our facilities. Each stage in the lifecycle corresponds to a different quarter within Medtronic’s fiscal year. This process is repeated on an annual basis for operations facilities and every three years for commercial facilities. Inaugural assessments for commercial facilities began this year via a phased approach by region and will continue over the next two years.

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 be labeled as Low, Medium, or High Risk.

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.
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.
10. The LSSR and the Survey will be combined to create a Risk Score of:

   a. An Overall Ranking of High will result in escalation to the Emergency Review Board:
      1. 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 and surveyed again in 1 year.
         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 Medium will require that the following steps are taken:
      1. Remediation plan is developed and delivered to facility site lead
      2. 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 and surveyed again in 1 year.
         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 will result in operational controls to mitigate against potential future risk and will require surveying the facility again in 1 year (3 years if commercial).
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 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 and labor standards that have been established by law and internationally recognized organizations.

Scope

This policy applies to all Medtronic locations, all Medtronic personnel, and any third party labor agencies providing employees on Medtronic’s behalf. Medtronic will strive to ensure that its suppliers adhere to the minimum standards that are outlined within this policy.

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
  - All employment decisions, including hiring, pay, and promotions, will be made without regard to gender, sex, sexual orientation, gender identity and/or expression, age, color, national origin, citizenship status, physical or mental disability, race, religion, creed, genetic information, marital status, familial status, status with regard to public assistance, veteran status, or any other characteristic protected by country, federal, state or local law.

- 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.
  - Medtronic prohibits any harassing behavior, as defined below under Prohibited Conduct.

- Freedom from Forced Labor
GLOBAL HUMAN RIGHTS AND LABOR STANDARDS POLICY

- Medtronic will not use or engage in any form of coerced, bonded, indentured, or prison labor. All 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.

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.

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 will not tolerate any form of retaliation against an individual who reports, files, testifies, participates in an investigation or agency proceeding or who is a witness to a violation of this policy. Employees who engage in any act of retaliation may be subject to disciplinary action up to and including unpaid suspension and/or termination of employment. There will be no retaliation against any individual who, in good faith and belief, reports such conduct, even if the investigation produces insufficient corroborating evidence or the claims cannot be proven. However, disciplinary action may be taken against individuals who make false, frivolous, reckless or malicious allegations.

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

**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.

To demonstrate our commitment to compliance, Medtronic annually publishes a public report detailing the work of our Global Human Rights Program.

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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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.

Prohibited Conduct includes, but is not limited to:

- Any conduct that shows hostility toward an individual because of the individual’s sex, gender, sexual orientation, gender identity and/or expression, marital status, race, color, religion, national origin, ancestry, military or veteran status, age, disability (whether physical or mental), medical condition, genetic information, or any other characteristic protected by law.
- Any conduct that is abusive, threatening or bullying, even if such conduct is not based on a legally protected characteristic. Specifically, any malicious conduct that a reasonable person would find hostile, offensive, and unrelated to an employer’s legitimate business interests, including the repeated use of derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person’s work performance.
- Conduct may be deemed offensive behavior even if it does not meet the legal definition of harassment under state or federal law
- Abusive conduct, defined as malicious behaviors that can include the repeated use of derogatory remarks, insults, and verbal or physical conduct that a reasonable person would consider threatening, intimidating, or humiliating, as well as the deliberate sabotaging or undermining of a worker’s performance of a job.

References & Related Policies

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FAQs
None.

Policy Contacts

Appendices
None.

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Medtronic Policy Portal: policy.medtronic.com

Global Harassment and Other Forms of Offensive Behavior Policy

Global Workplace Safety and Security Policy

Global Policy on Policies

Global Environmental Health and Safety Policy

Voice Your Concern Policy

Global Anti-Human Trafficking and Forced Labor Policy

United Nations Guiding Principles of Business and Human Rights

International Labour Organization’s Fundamental Conventions


None.

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GLOBAL ANTI-HUMAN TRAFFICKING AND FORCED LABOR

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

To demonstrate our commitment to compliance, Medtronic annually publishes a public report detailing the work of our Global Human Rights Program.

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 will not tolerate any form of retaliation against an individual who reports, files, testifies, participates in an investigation or agency proceeding or who is a witness to a violation of this policy. Employees who engage in any act of retaliation may be subject to disciplinary action up to and including unpaid suspension and/or termination of employment. There will be no retaliation against any individual who, in good faith and belief, reports such conduct, even if the investigation produces insufficient corroborating evidence or the claims cannot be proven. However, disciplinary action may be taken against individuals who make false, frivolous, reckless or malicious allegations.

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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**Procedures**
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|                 | • Support compliance of this policy                                             |
GLOBAL ANTI-HUMAN TRAFFICKING AND FORCED LABOR POLICY

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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