

MEDTRONIC

FY17

GRI SUPPLEMENT

Page numbers correspond to the FY17 Integrated Performance Report.

Our FY17 Integrated Report was prepared in accordance with the G4 Core guidelines of the Global Reporting Initiative (GRI) — an internationally recognized standard for reporting on corporate social and environmental responsibility performance. We have reported on GRI G4 Aspects related to our 13 material issues and include information and references to our FY17 Integrated Performance Report, financial reports, and corporate governance guidelines.

We also include a Sustainability Accounting Standards Board (SASB) index for the Medical Equipment and Supplies Industry.

Medtronic

DISCLOSURE ON
MANAGEMENT
APPROACH TO
MATERIAL ISSUES

ACCESS TO CARE

Definition	<p>The availability and affordability of our technology, services, and solutions to people upon applicable regulatory approval. This centers on our efforts to ensure Medtronic products are accessible to patients who can benefit from them by removing barriers to affordable treatment and management of disease. It includes working with health systems around the world to share technologies, services, therapies, resources, and expertise.</p>
Disclosure on Management Approach	<p>DMA-a</p> <p>The accessibility of our products and solutions is critical to our Mission and our business success. Making our therapies accessible to people everywhere is inherent in our growth strategy.</p> <p>We view access to healthcare as a human rights issue and believe that all people deserve the care they need. Our Mission drives us to contribute to human welfare by improving health outcomes, and our access strategy is a key element of this.</p> <p>Through business and philanthropic activities, we assess local, unmet healthcare needs. We tailor new or existing products, solutions, and therapies to overcome barriers to care and reduce health inequality.</p> <p>DMA-b</p> <p>We are guided by our Mission: To contribute to human welfare by application of biomedical engineering in the research, design, manufacture, and sale of instruments or appliances that alleviate pain, restore health, and extend life.</p> <p>Each business unit develops new products, therapies, and programs to reach more people with life-changing care. We also develop strategies, programs, and business activities designed to increase access to healthcare. These include our Hub & Spoke healthcare model, Medtronic Care Management Services, Medtronic Integrated Health Solutions, Medtronic Labs, and our Patient Access Acceleration methodology.</p> <p>Our value-based healthcare strategy leads us to develop new business models and payment systems, and is guided by the Medtronic Value-Based Healthcare Council.</p> <p>We partner with healthcare providers to enhance access by improving local infrastructure and services. We deliver a range of capacity-building initiatives to enrich the skills and understanding of medical professionals and patients.</p> <p>The Medtronic Foundation also contributes to our access strategy. Detailed information about management of our philanthropic programs is available at http://www.medtronic.com/us-en/about/foundation.html.</p> <p>DMA-c</p> <p>Efforts to increase access to healthcare are embedded in the day-to-day operations of our entire company. The Medtronic board of directors and Executive Committee have primary responsibility for ensuring that we are maximizing our ability to reach patients who can benefit from our products and therapies. Each business unit and region reports to the board regularly.</p> <p>The Medtronic Foundation is led by a board of directors that includes senior leaders from across Medtronic business units and regions, as well as Omar Ishrak, chairman and CEO.</p>
Boundaries (G4-20, G4-21)	<p>Access, and our related impacts, are relevant for all our customers and patients. This includes individuals who are not yet customers or patients but who could benefit from our products or therapies.</p>
Reference for More Information	<p>See Access, pages 16–20, and Economic Contributions to Society, pages 9–14, for more information about how we provide access to healthcare to those who need it.</p>

Related GRI Aspects

SO: Local Communities
EC: Indirect Economic Impacts

PRODUCT QUALITY**Definition**

Product quality reflects our commitment to ensuring quality and safety of our products in relation to all our stakeholders, including patients, physicians, hospital administrators, and Medtronic employees. It covers design, reliability, manufacturability, supplier quality, global compliance, post-market surveillance, complaint handling, and corrective action planning.

Disclosure on Management Approach**DMA-a**

Our patient-centric approach compels us to put product quality and safety first. Product quality covers the full lifecycle of a product, from design through manufacture, use, and disposal. Quality and reliability are important to ensure the safety of all the patients who depend on our products and therapies for their health and well-being.

DMA-b

At Medtronic, product quality is everyone's responsibility, and it is embedded into our culture. We require employees worldwide to obtain our Annual Quality Training Certification. At the highest level, the Quality Committee of the board of directors is responsible for oversight of Medtronic quality programs. In our business, the Global Quality department leads our product quality efforts. Our senior vice president of Global Quality is a member of the Executive Committee.

Our Global Quality Strategy takes a patient-centered approach and ensures that we deliver consistent enterprise-wide quality. Specific processes and programs under our Global Quality Strategy include:

- Design, Reliability, Manufacturability (DRM) program, which ensures safety and reliability in R&D
- The Medtronic Operating System, which ensures quality and continual improvement in production
- The Global Quality Management System, which ensures that processes are simple, standard, scalable, and easy to comply with
- The Quality Begins with Me program, which empowers employees and suppliers to promote excellence and show individual ownership and leadership of our quality approach
- ISO 13485, which sets out requirements for quality management systems specific to medical devices

We also adhere to regulatory requirements, such as those set by the U.S. FDA, and use the Medtronic Corporate-Wide Assessment for Regulatory Excellence (MCARE) to drive continual improvement in our regulatory compliance systems.

DMA-c

The Quality Committee of the board of directors monitors and evaluates our quality systems and processes on an annual basis. Full details of committee responsibilities are available in the [committee charters](#) on our [Corporate Governance](#) website.

We apply Lean Six Sigma principles and use the MCARE to foster continual improvement in our quality systems.

When we experience a quality problem with one of our products or therapies, we take all necessary actions to remedy the issue and identify opportunities for improvement to prevent future problems.

Boundaries (G4-20, G4-21)	<p>Product quality is relevant across the entire product lifecycle. Within Medtronic, we manage product quality in R&D, manufacturing and production, sales, distribution, post-market surveillance, complaint handling, and corrective action planning.</p> <p>Product quality is relevant to external groups, including customers — the medical professionals and patients who rely on our products and therapies.</p>
Reference for More Information	See Product Quality on pages 21–24 for more information about how we manage product quality across our business.
Related GRI Aspects	<p>PR: Compliance</p> <p>PR: Customer Health and Safety</p> <p>PR: Product Labeling</p>
PRODUCT STEWARDSHIP	
Definition	Minimizing the lifecycle footprint of our products and packaging through product management and design innovation.
Disclosure on Management Approach	<p>DMA-a Our customers expect us to demonstrate strong environmental stewardship across the lifecycle of our products. Developing products like pacemakers and defibrillators uses energy and natural resources and can also create waste. Driven by our Mission, we proactively manage environmental, health, and safety impacts from our products and packaging across our value chain to minimize our environmental impact.</p> <p>DMA-b Our Environmental, Health, Safety, and Sustainability (EHS&S) program commits us to continually advance our product stewardship initiatives across the product lifecycle to meet customer needs and expectations. The goal for our newly established Sustainable Packaging Working Group is to create processes and programs to promote, assess, and measure sustainability in our packaging design.</p> <p>DMA-c The Medtronic corporate EHS&S team oversees EHS standards and references for all businesses and regions. Our Sustainability Steering Committee is responsible for overseeing and evaluating new product stewardship strategies. Our Corporate Program Management team oversees our environmental innovation and compliance efforts. Our Hazardous Substance team works with units across the business to analyze regulations, provide instructions for compliance, develop detailed implementation plans, and evaluate the effectiveness of our compliance programs.</p>
Boundaries (G4-20, G4-21)	Product stewardship is relevant to our operations, supply chain, and customers.
Reference for More Information	See Product Stewardship, page 25, for more information about how we manage our product stewardship.
Related GRI Aspects	<p>EN: Materials</p> <p>EN: Products and Services</p>

RESPONSIBLE SUPPLY MANAGEMENT

Definition	Responsible supply management is our practice of collaborating with our supply chain to develop long-term relationships that enhance product quality, worker rights, impact on local communities, and environmental protection.
Disclosure on Management Approach	<p>DMA-a A robust and reliable supply chain is critical to our business. It allows us to produce and deliver the medical devices and therapies on which our customers and millions of patients depend. Maintaining a responsible supply chain is essential to delivering the quality products that drive our company's success and supports our social license to operate.</p> <p>DMA-b To drive responsible practices across our global supply chain, we expect all suppliers to operate ethically. This means following applicable laws related to governance, environmental responsibility, workplace health and safety, and human rights. More details are outlined in our approach to Supplier Quality.</p> <p>The Responsible Supply Management function establishes overall strategy and goals, prioritizing regulatory compliance, supplier diversity, and customer requirements.</p> <p>Our Supplier Product Quality program is built on:</p> <ul style="list-style-type: none">▪ Continuous improvement opportunities through training and development▪ Participation in our Design, Reliability, Manufacturability process, which ensures standardized product performance▪ Our Supplier Quality Excellence Manual, which all suppliers are required to follow <p>Our Supplier Diversity team, Supplier Diversity Steering Committee, and executive management team lead our Supplier Diversity program. Our approach includes identifying suitable new diverse suppliers, raising internal awareness about supplier diversity, and joining initiatives that support supplier diversity beyond our business.</p> <p>DMA-c We provide suppliers with protocols, training, and support to ensure that regulatory and self-imposed quality standards are consistently met. Agents and contractors must comply with the Medtronic Global Code of Conduct. We investigate all reported violations and take appropriate action where necessary, including terminating agreements with contractors.</p>
Boundaries (G4-20, G4-21)	Responsible sourcing is relevant to our suppliers, patients, customers, and local communities.
Reference for More Information	See Responsible Supply Management, pages 26–28, for more information about how we oversee responsible sourcing for our products.

Related GRI Aspects	LA: Supplier Assessment for Labor Practices HR: Supplier Human Rights Assessment EN: Supplier Environmental Assessment EC: Procurement Practices EC: Indirect Economic Impacts HR: Human Rights Grievance Mechanisms HR: Non-Discrimination HR: Freedom of Association
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ETHICS IN SALES AND MARKETING

Definition	Ethics in sales and marketing is our commitment to ensuring responsible business practices in relation to the marketing, communication, and promotion of our products and services. This includes the monitoring and prevention of corruption and conflicts of interest in sales-related interactions between our employees and healthcare personnel as well as compliance with global regulations.
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Disclosure on Management Approach	<p>DMA-a Forming and maintaining the trust of customers, patients, industry partners, healthcare providers, investors, regulators, governments, and employees is critical to our success. Corrupt practices undermine this trust, our Mission-led commitment to integrity, and our business performance. Building trust also requires that we are transparent about our products, services, and practices at all times. Our customers depend on our medical products, services, and therapies, and we must ensure that they are promoted factually, lawfully, and in a way that supports their approved use.</p>
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DMA-b

Medtronic follows several internal and external policies that help assure ethics in sales and marketing. These include:

- [Global Business Conduct Standards Policy](#) (Includes our Global Anti-Corruption Policy)
- [Code of Conduct](#)
- [Code of Ethics for Senior Financial Officers](#)
- [Code of Business Conduct and Ethics for Members of the Board of Directors](#)
- [Medtronic Donations](#)

Employees and board members must certify their understanding of the Code of Conduct annually. Customer-facing employees must complete mandatory biennial anti-corruption training. We also monitor and conduct due diligence on global distributors before entering into contracts with them. Individual Medtronic business units maintain internal review processes to ensure that accurate and appropriate product promotion occurs. Medtronic has internal policies that prohibit the unlawful promotion of products for off-label uses.

DMA-c

The Medtronic Office of Ethics and Compliance (OEC), and the chief ethics and compliance officer, oversee and implement all ethics- and compliance-related policies and programs. The chief ethics and compliance officer reports results periodically to the CEO, the Audit Committee, and at least annually to the board.

Boundaries (G4-20, G4-21)	<p>Ethics in sales and marketing, and its related impacts, is relevant to all Medtronic employees.</p> <p>Ethics in sales and marketing, and related impacts, is relevant to healthcare providers, industry partners, patients, distributors, investors, regulators, and governments.</p>
Reference for More Information	See Ethics in Sales and Marketing, pages 29–30, and Governance and Engagement, pages 32–34, for more information.
Related GRI Aspects	<p>SO: Anti-Competitive Behavior</p> <p>SO: Anti-Corruption</p> <p>PR: Marketing Communications</p>
TRIAL DATA	
Definition	Ethical and responsible conduct related to clinical trials, including transparency of data, ethics in research and development, and clinical data sharing.
Disclosure on Management Approach	<p>DMA-a The way we collect and evaluate data is a critical component of our commitment to product quality and safety. Reliable and transparent information ensures that our clinical trials are conducted ethically and in alignment with the highest standards for data integrity and analysis. This, in turn, ensures that our products and therapies are safe and effective for the patients who depend on them.</p> <p>DMA-b We follow rigorous guidelines laid out in our Code of Conduct, Global Business Conduct Standards Policy, and Clinical Trials Principles. We also follow international guidelines for clinical research, where applicable, including the World Health Organization Good Clinical Practice standards and ISO 14155:2011. Our Clinical Trials Registry details information about the purpose, eligibility requirements, locations, and status of the applicable clinical trials that we sponsor. Oversight for clinical trials is the responsibility of the chief scientific, clinical, and regulatory officer, who serves on the Executive Committee.</p> <p>DMA-c The Quality Committee of the board of directors monitors and evaluates on an annual basis our approach to research and development as well as human and animal studies. Full details of committee responsibilities are available in the committee charters on our Corporate Governance website.</p> <p>We also work with external organizations and peers to improve and scale the way we collect data and evaluate products and therapies through clinical trials.</p>
Boundaries (G4-20, G4-21)	<p>Ethics, transparency, and reliability of trial data are relevant in our R&D operations and the Regulatory and Clinical Affairs departments.</p> <p>Ethics, transparency, and reliability of trial data are relevant to external groups, including customers — the medical professionals and patients who participate in our clinical trials and use our products once they reach the market.</p>
Reference for More Information	See Product Quality, pages 21–24, for more information about how we manage ethics, transparency, and reliability of trial data.
Related GRI Aspects	PR: Customer Health and Safety

STAKEHOLDER ENGAGEMENT

Definition	Engaging stakeholders throughout the healthcare system, including patients, physicians, hospital administrators, advocacy groups, governments, nonprofits and nongovernmental organizations, employees, suppliers, investors, shareholders, regulators, and the communities where we operate.
Disclosure on Management Approach	N/A
Boundaries (G4-20, G4-21)	N/A
Reference for More Information	See Governance and Engagement, pages 32–34, and Sustainability Risks and Opportunities, pages 6–8, for more information about how we engage with our stakeholders.
Related GRI Aspects	General Standard Disclosures

DEVICE SECURITY

Definition	Device security is our ability to keep customer products and therapies safe from the cyber-related threats and vulnerabilities that might compromise the intended use of a product or personal data related to the patient.
Disclosure on Management Approach	<p>DMA-a Device security as well as any potential threat to patient safety is taken very seriously at Medtronic. Medtronic works to make products safe and secure while still easy to use for the customers who depend on them. While we are not aware of any incident of unauthorized access or intrusion to an implanted device, device security is an area that is consistently addressed in the design process.</p> <p>DMA-b Medtronic has a formally approved companywide Global Product Security Policy that provides guidance on integrating security into product development. This policy is combined with a strong product security program.</p> <p>Medtronic engages with external organizations and experts to maintain best practice. We also provide commentary and feedback on developing product security-related standards globally.</p> <p>DMA-c Medtronic’s Global Privacy and Security Office and Security Steering Committee oversee our security framework, including relevant initiatives, policies, and programs.</p> <p>The Quality Committee of the board of directors monitors and evaluates our quality systems and processes on an annual basis. Full details of committee responsibilities are available in the committee charters on our Corporate Governance website.</p>
Boundaries (G4-20, G4-21)	<p>Device security is relevant across the entire product lifecycle. Within Medtronic, we manage product quality and security in R&D, manufacturing and production, sales, and distribution.</p> <p>Device security is relevant to external groups, including the medical professionals and patients who rely on our products and therapies.</p>

Reference for More Information	See Ethics in Sales and Marketing, pages 29–30, and Product Quality, pages 21–24.
Related GRI Aspects	PR: Customer Health and Safety PR: Customer Privacy
PHILANTHROPY	
Definition	Philanthropic giving through the Medtronic Foundation, and Medtronic corporate cash contributions and product donations.
Disclosure on Management Approach	<p>DMA-a We give back to the communities where we operate, where our people live and work, and to communities worldwide where our patients, and potential patients, live.</p> <p>Through philanthropic activities, we further contribute to our core Mission of alleviating pain, restoring health, and extending lives.</p> <p>DMA-b Our philanthropic contributions are managed by the Medtronic Foundation and by Medtronic business units. We focus on global health programs for underserved populations and localized community grantmaking. We also make contributions related to disaster relief and support employee volunteer engagement. Medtronic provides matching gifts and paid volunteer hours to encourage and support our employee volunteer efforts.</p> <p>We disclose all donations made to U.S. customers, or organizations affiliated with them, on our Charitable Donations Registry.</p> <p>Our corporate guidelines for charitable giving are outlined in our Charitable Donations Guidelines. They adhere both to our Global Business Conduct Standards Policy and the medical technology industry’s AdvaMed Code of Ethics.</p> <p>DMA-c The Medtronic Foundation continually evaluates the impact of our philanthropic activities and emerging global healthcare needs across the continuum of care. More information on our efforts to assess and meet emerging healthcare needs is available in Access, pages 16–20. We also use periodic grant reports from grant recipients to evaluate the Medtronic Foundation’s strategy and impact.</p> <p>The Medtronic Foundation is led by a board of directors that includes Medtronic senior leaders from across the business units and regions as well as Omar Ishrak, chairman and CEO.</p>
Boundaries (G4-20, G4-21)	<p>Within Medtronic and the Medtronic Foundation, many of our philanthropic activities apply to our employees, who are encouraged to give back to their communities through charitable contributions and volunteerism.</p> <p>Philanthropy is relevant outside of Medtronic to all the communities, or potential communities, that receive funds and/or product donations from Medtronic. We focus our community grantmaking where we have the largest employee base but give more broadly all over the world. In FY17, the Foundation distributed grants worth a total of \$10.2 million to 108 organizations in 62 communities around the world.</p>
Reference for More Information	See Economic Contributions to Society, pages 9–14, for more information about our approach to philanthropy.
Related GRI Aspects	SO: Local Communities EC: Indirect Economic Impact

POST-MARKET SURVEILLANCE

Definition	Ethical and responsible conduct related to post-market surveillance, including transparency of data, data collection, and clinical data sharing.
Disclosure on Management Approach	<p>DMA-a The way we collect and evaluate data once a product or therapy has reached the market is a critical component of our commitment to product quality and safety. It also plays a vital role in our move toward value-based healthcare with a focus on patient outcomes.</p> <p>Reliable and transparent information ensures that our post-market surveillance activities are conducted ethically and in alignment with the highest standards for data integrity and analysis. This, in turn, ensures that our products and therapies are safe and effective for the patients who depend on them. Post-market surveillance also helps us understand product performance in a real-world setting, measure performance against known complications, and identify potential problems early.</p> <p>DMA-b Our post-market surveillance is overseen by our chief scientific, clinical, and regulatory officer who serves on the Executive Committee.</p> <p>DMA-c The Quality Committee of the board of directors monitors and evaluates our approach to product quality and human and animal studies on an annual basis. Full details of committee responsibilities are available in the committee charters on our Corporate Governance website.</p> <p>We also work with external organizations and peers to improve and scale the way we collect data and evaluate products and therapies once they reach the market.</p>
Boundaries (G4-20, G4-21)	Ethics, transparency, and reliability of post-market surveillance activities is relevant to external groups, including the medical professionals, patients, health systems, and insurers who participate in our surveillance activities and use our products.
Reference for More Information	See Product Quality, pages 21–24, for more information about how we manage ethics, transparency, and reliability of clinical data in our post-market surveillance.
Related GRI Aspects	PR: Customer Health and Safety

CORPORATE GOVERNANCE

Definition	The policies, procedures, and practices that govern our company, including board structure, executive compensation, and accountability.
Disclosure on Management Approach	N/A
Boundaries (G4-20, G4-21)	N/A
Reference for More Information	See Governance and Engagement, pages 32–34, for more information about our corporate governance structure.
Related GRI Aspects	General Standard Disclosures

TALENT

Definition

Talent relates to the recruitment, retention, and development of Medtronic employees. This includes employee training, career management and promotion, and leadership development, in addition to compensation and benefits practices.

Disclosure on Management Approach

DMA-a

Our business is knowledge-based, and our success is dependent on attracting, developing, and retaining the top, diverse, and collaboratively-minded talent. We support our growing workforce through global career development and training programs, career management opportunities, and competitive benefits and compensation practices. In FY17, we launched a new, harmonized process to support clear and consistent performance and career management across the company.

Diversity, inclusion, and gender balance in the workforce are also considered priority areas for Medtronic. The Global Inclusion, Diversity, and Engagement team leads our efforts to promote diversity and create an inclusive workplace through our Human Resources processes and priorities. In FY17, we announced our 2020 goal to employ 40 percent or more women and 20 percent or more ethnically diverse talent in manager roles or above.

DMA-b

Our Mission inspires us to recognize the personal worth of our employees by providing an employment framework that allows personal satisfaction in work accomplished, security, advancement opportunity, and means to share in the company's success.

Our Human Resources department has established programs and policies to attract, develop, and retain a diverse set of talented employees. Internal and external-facing policies and programs include:

- [Code of Conduct](#)
- [EEO Statement](#)
- [Voice Your Concern Policy](#)
- [Medtronic Benefits, Policies, and Services](#)

DMA-c

The chief human resource officer serves on the Executive Committee and has primary responsibility for talent-related initiatives.

The Medtronic Compensation Committee assists the board of directors in overseeing and evaluating employee benefit plans and stock programs.

[Medtronic's Voice Your Concern Line](#) is a website and toll-free hotline operated by a third party that provides employees as well as anyone operating on behalf of Medtronic a place to report and voice concerns. The OEC evaluates all reported concerns and escalates as necessary.

Medtronic monitors the effectiveness of talent programs through internal feedback mechanisms, including our Employee Engagement Survey, pulse surveys, and performance evaluations.

Boundaries (G4-20, G4-21)

Within Medtronic, our approach to talent is relevant to all current employees.

Outside Medtronic, our approach to talent is relevant to all prospective employees and former employees.

Reference for More Information

See Employees, pages 39–43, Governance and Engagement, pages 32–34, and our [Compensation Committee Charter](#) website for more information about our approach to talent management.

Related GRI Aspects	<p>LA: Employment LA: Training and Education LA: Equal Remuneration for Women and Men LA: Labor Practices Grievance Mechanisms SO: Anti-Corruption</p>
FINANCIAL STRENGTH	
Definition	Sustainable revenue generation and business growth through disciplined management of financial capital and resources.
Disclosure on Management Approach	<p>DMA-a Sound financial stewardship is at the core of everything we do. A financially strong Medtronic benefits the public and private sectors by providing new jobs, infrastructure investments, shareholder returns, and taxes. The financial strength of our business enables us to improve clinical outcomes, expand access to healthcare, and optimize healthcare cost and efficiency.</p> <p>DMA-b We apply rigorous financial discipline as we pursue three growth strategies:</p> <ol style="list-style-type: none"> 1. Therapy Innovation 2. Globalization 3. Economic Value <p>DMA-c Our financial performance is overseen by the Audit Committee and the Finance and Financial Risk Committee of the board of directors.</p> <p>The Audit Committee is responsible for the integrity of our financial reporting, auditing, and compliance. The Finance and Financial Risk Committee has oversight of our financial policies, strategies, and capital structure. Full details of committee responsibilities are available in the committee charters on our Corporate Governance website.</p> <p>Our shareholders, as owners of our company, have ultimate say in our financial management. Our Investor Relations team has ongoing contact with our shareholders, and we formally communicate with them and invite feedback through quarterly earnings calls and annual meetings.</p>
Boundaries (G4-20, G4-21)	<p>Financial strength is relevant across all of our operations in the way that we generate and use financial resources.</p> <p>Financial strength is relevant outside our business in the way that we generate revenue from our customers, purchase goods and services from our suppliers, and support local communities, including research and development outlays; selling, general, and administrative expenses; and income taxes.</p>
Reference for More Information	See Economic Contributions to Society, pages 9–14, our 2017 Form 10-K, and our Corporate Governance and Investor Relations websites for more information about our approach to financial management.
Related GRI Aspects	<p>EC: Economic Performance EC: Indirect Economic Impacts</p>

GRI G4 INDEX

INDICATOR	RESPONSE
GENERAL STANDARD DISCLOSURES	
STRATEGY AND ANALYSIS	
G4-1: Statement from most senior decision-maker.	CEO Letter, page 3
G4-2: Key impacts, risks, and opportunities.	CEO Letter, page 3 Sustainability Risks and Opportunities, page 6 2017 Form 10-K
ORGANIZATIONAL PROFILE	
G4-3: Name of the organization.	Medtronic Public Limited Company
G4-4: Primary brands, products, and services.	Company Overview, page 4 2017 Form 10-K
G4-5: Location of the organization's headquarters.	20 Lower Hatch Street, Dublin 2, Ireland
G4-6: Number of countries where the organization operates, and names of countries where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report.	Company Overview, page 4 Responsible Supply Management, page 26 2017 Form 10-K
G4-7: Nature of ownership and legal form.	Medtronic plc is a publicly traded company on the New York Stock Exchange, Inc. under the ticker symbol MDT.
G4-8: Markets served (including geographic breakdown, sectors served, and types of customers and beneficiaries).	Economic Contributions to Society, page 9 2017 Form 10-K , pg. 8
G4-9: Scale of organization.	Company Overview, page 4 Economic Contributions to Society, page 9 2017 Form 10-K
G4-10: Total workforce by employment contract and gender.	Employees – Global Workforce, page 39 Employees – Data Summary, pages 42–43

INDICATOR	RESPONSE
G4-11: Percentage of total employees covered by collective bargaining agreements.	Medtronic complies with global laws regarding freedom of association and collective bargaining agreements, including participation in work councils. Approximately 35 percent of our European workforce is represented by work councils and roughly half is covered by collective bargaining agreements with trade unions. Our U.S. workforce is not unionized.
G4-12: Describe the organization's supply chain.	Responsible Supply Management, page 26
G4-13: Significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain.	Company Overview, page 4 Responsible Supply Management, page 26 2017 Form 10-K
G4-14: Whether and how the precautionary approach or principle is addressed by the organization.	Sustainability Risks and Opportunities, page 6 Product Quality, page 21 Operations – Our Management Approach, page 35
G4-15: Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or which it endorses.	Sustainability Risks and Opportunities – Creating Opportunities, page 8 Access – Economic Value, page 17–18 Product Quality – Clinical Trials, page 23–24 Product Quality – Pre-Clinical Research, page 24 Responsible Supply Management – Conflict Minerals, page 27 Ethics in Sales and Marketing – Responsible Marketing to Customers and Patients, page 30 Ethics in Sales and Marketing – Customer Data Security, page 30 Operations – Our Management Approach, page 35
G4-16: Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	Access – Expanding Global Access, page 17–18 Product Quality – Clinical Trials, page 23–24 Responsible Supply Management – Conflict Minerals, page 27 Ethics in Sales and Marketing – Customer Data Security, page 30 Governance and Engagement – Public Policy, page 34

INDICATOR	RESPONSE
IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES	
G4-17: All entities included in the organization’s consolidated financial statements or equivalent documents and whether any of these entities is not covered by the report.	Company Overview, page 4 About This Report, page 44 2017 Form 10-K
G4-18: Explain the process for defining the report content and the Aspect Boundaries, and how the organization has implemented the Reporting Principles for Defining Report Content.	Sustainability Risks and Opportunities, page 6 About This Report, page 44
G4-19: All the material Aspects identified in the process for defining report content.	Sustainability Risks and Opportunities, page 6 Disclosures on Management Approach
G4-20: The Aspect Boundary within the organization for each material Aspect.	Disclosures on Management Approach
G4-21: The Aspect Boundary outside the organization for each material Aspect.	Disclosures on Management Approach
G4-22: The effect of any restatements of information provided in previous reports, and the reasons for such restatements.	Any restatements of information and data provided in previous reports are noted throughout this report.
G4-23: Significant changes from previous reporting periods in the Scope and Aspect Boundaries.	About This Report, page 44 Throughout the report
STAKEHOLDER ENGAGEMENT	
G4-24: A list of stakeholder groups engaged by the organization.	Sustainability Risks and Opportunities, page 6 Governance and Engagement – Stakeholder Engagement, page 34
G4-25: The basis for identification and selection of stakeholders with whom to engage.	Sustainability Risks and Opportunities, page 6 Governance and Engagement – Stakeholder Engagement, page 34
G4-26: The organization’s approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.	Sustainability Risks and Opportunities, page 6 Governance and Engagement – Stakeholder Engagement, page 34 Throughout the report
G4-27: Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting. The stakeholder groups that raised each of the key topics and concerns.	Sustainability Risks and Opportunities, page 6 Throughout the report

INDICATOR	RESPONSE
REPORT PROFILE	
G4-28: Reporting period for information provided.	About This Report, page 44
G4-29: Date of most recent previous report.	About This Report, page 44
G4-30: Reporting cycle.	Annual
G4-31: The contact point for questions regarding the report or its contents.	About This Report, page 44
G4-32: Report the “in accordance” option the organization has chosen; the GRI Content Index for the chosen option, and the reference to the External Assurance Report, if the report has been externally assured.	About This Report, page 44
G4-33: The organization’s policy and current practice with regard to seeking external assurance for the report.	At this time, we do not pursue external assurance for our report or any specific GRI Indicators.
GOVERNANCE	
G4-34: The governance structure of the organization, including committees of the highest governance body. Identify any committees responsible for decision-making on economic, environmental, and social impacts.	Governance and Engagement – Corporate Governance, page 32 Corporate Governance Website
ETHICS AND INTEGRITY	
G4-56: The organization’s values, principles, standards, and norms of behavior, such as codes of conduct and codes of ethics.	Ethics in Sales and Marketing – Ethical Business Conduct, pages 29–30 Governance and Engagement – Ethical Workplace, pages 33–34 Product Quality – Pre-Clinical Research, page 24 Medtronic Global Code of Conduct Global Business Conduct Standards policy Medtronic Mission

INDICATORS BY ASPECTS	RESPONSE	IDENTIFIED OMISSIONS	EXPLANATION FOR OMISSIONS
CATEGORY: ECONOMIC			
ECONOMIC PERFORMANCE			
Disclosure on Management Approach	DMA: Financial Strength		
G4-EC1: Direct economic value generated and distributed.	Economic Contributions to Society – Expenditures, page 11 Economic Contributions to Society – Philanthropy, pages 12–13 2017 Form 10-K		
G4-EC2: Financial implications and other risks and opportunities for the organization’s activities due to climate change.	Sustainability Risks and Opportunities, page 6		
G4-EC3: Coverage of the organization’s defined benefit plan obligations.	Employees – Employee Compensation, page 41		
INDIRECT ECONOMIC IMPACTS			
Disclosure on Management Approach	DMAs: Responsible Supply Management, Financial Strength, Philanthropy		
G4-EC7: Development and impact of infrastructure and services supported.	Economic Contributions to Society – Financial Performance, pages 9–10 Economic Contributions to Society – Expenditures, page 11 Economic Contributions to Society – Philanthropy, pages 12–13 Access – Economic Value, pages 17–18 Access – Expanding Global Access, pages 18–20 Responsible Supply Management – Supplier Diversity, pages 27–28		

INDICATORS BY ASPECTS	RESPONSE	IDENTIFIED OMISSIONS	EXPLANATION FOR OMISSIONS
CATEGORY: ECONOMIC			
PROCUREMENT PRACTICES			
Disclosure on Management Approach	DMA: Responsible Supply Management		
G4-EC9: Proportion of spending on local suppliers at significant locations of operation.	Responsible Supply Management, page 26	Percentage of the procurement budget used for significant locations of operation spent on suppliers local to that operation.	The information is currently unavailable. At this time, we do not collect data on the percentage of the procurement budget used for significant locations of operation spent on suppliers local to that operation. Medtronic collects total procurement spend at significant locations of operation.
CATEGORY: ENVIRONMENTAL			
MATERIALS			
Disclosure on Management Approach	DMA: Product Stewardship		
G4-EN2: The percentage of recycled input materials used to manufacture the organization's primary products and services.	Operations, page 35	Percentage of recycled input materials used to manufacture the organization's primary products and services.	The information is currently unavailable. We do not collect enterprise-wide data on our recycled input materials used in manufacturing our primary products. We plan to track this through a data collection system in future years.
PRODUCTS AND SERVICES			
Disclosure on Management Approach	DMA: Product Stewardship		
G4-EN27: Extent of impact mitigation of environmental impacts of products and services.	Operations, page 35 Product Stewardship – Our Approach, page 25		

INDICATORS BY ASPECTS	RESPONSE	IDENTIFIED OMISSIONS	EXPLANATION FOR OMISSIONS
CATEGORY: ENVIRONMENTAL			
SUPPLIER ENVIRONMENTAL ASSESSMENT			
Disclosure on Management Approach	DMA: Responsible Supply Management		
G4-EN32: Percentage of new suppliers that were screened using environmental criteria.	Responsible Supply Management, page 26	Percentage of new suppliers that were screened using environmental criteria.	The information is currently unavailable. In FY17, Medtronic introduced Global Supplier Standards, which outline ethical and environmental requirements that suppliers must comply with. The tools necessary to screen new suppliers in accordance with these standards are being developed, with an expected launch date of FY18.
CATEGORY: SOCIAL			
LABOR PRACTICES AND DECENT WORK			
Employment			
Disclosure on Management Approach	DMA: Talent		
G4-LA1: Total number and rates of new employee hires and employee turnover by age group, gender, and region.	Employees – Global Workforce, page 39 Employees – Data Summary, pages 42–43		
G4-LA2: Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation.	Employees – Employee Compensation, page 41		

INDICATORS BY ASPECTS	RESPONSE	IDENTIFIED OMISSIONS	EXPLANATION FOR OMISSIONS
CATEGORY: SOCIAL			
LABOR PRACTICES AND DECENT WORK			
Training and Education			
Disclosure on Management Approach	DMA: Talent		
G4-LA9: Average hours of training per year per employee by gender, and by employee category.	Employees – Investing in Our Workforce, page 39	Training by employee category.	The information is currently unavailable. All Medtronic employees have access to skills-based training. We do not currently track average hours of training per year per employee, by employee category. We track total spent on training and development activities.
G4-LA10: Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	Employees – Investing in Our Workforce, page 39		
Diversity and Equal Opportunity			
Disclosure on Management Approach	DMA: Talent		
G4-LA12: Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	Employees – Inclusion and Diversity, page 40 Employees – Data Summary, pages 42–43		
Equal Remuneration for Women and Men			
Disclosure on Management Approach	DMA: Talent		
G4-LA13: Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	Employees – Inclusion and Diversity, page 40	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	The information is subject to confidentiality constraints. Medtronic does not disclose this information.

INDICATORS BY ASPECTS	RESPONSE	IDENTIFIED OMISSIONS	EXPLANATION FOR OMISSIONS
CATEGORY: SOCIAL			
LABOR PRACTICES AND DECENT WORK			
Supplier Assessment for Labor Practices			
Disclosure on Management Approach	DMA: Responsible Supply Management		
G4-LA14: Percentage of new suppliers that were screened using labor practices criteria.	Responsible Supply Management, page 26	Percentage of new suppliers that were screened using labor practices criteria.	The information is currently unavailable. In FY17, Medtronic introduced Global Supplier Standards, which outline ethical and environmental requirements that suppliers must comply with. The tools necessary to screen new suppliers in accordance with these standards are being developed, with an expected launch date of FY18.
Labor Practices Grievance Mechanisms			
Disclosure on Management Approach	DMA: Talent		
G4-LA16: Number of grievances about labor practices filed, addressed, and resolved through formal grievance mechanisms.	Governance and Engagement – Ethical Workplace, pages 33–34	Number of grievances about labor practices filed, addressed, and resolved through formal grievance mechanisms.	The information is currently unavailable. At this time, we do not quantify number of grievances filed specifically about labor practices. Medtronic tracks the total number of concerns we receive but does not separate by issue (since many are cross-cutting).
HUMAN RIGHTS			
Non-Discrimination			
Disclosure on Management Approach	DMA: Responsible Supply Management		
G4-HR3: Total number of incidents of discrimination and corrective actions taken.	Responsible Supply Management, page 26	Total number of incidents of discrimination and corrective actions taken.	The information is currently unavailable. At this time, we do not track discrimination incidents for our suppliers. We do not plan to collect this specific information but expect our suppliers to follow local laws and regulations.

INDICATORS BY ASPECTS	RESPONSE	IDENTIFIED OMISSIONS	EXPLANATION FOR OMISSIONS
CATEGORY: SOCIAL			
HUMAN RIGHTS			
Freedom of Association and Collective Bargaining			
Disclosure on Management Approach	DMA: Responsible Supply Management		
G4-HR4: Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights.	Responsible Supply Management, page 26	Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights.	The information is currently unavailable. At this time, we do not track freedom of association and collective bargaining activities for our suppliers. We do not plan to collect this specific information but expect our suppliers to follow local laws and regulations.
Supplier Human Rights Assessment			
Disclosure on Management Approach	DMA: Responsible Supply Management		
G4-HR10: Percentage of new suppliers that were screened using human rights criteria.	Responsible Supply Management, page 26	Percentage of new suppliers that were screened using human rights criteria.	The information is currently unavailable. In FY17, Medtronic introduced Global Supplier Standards, which outline ethical and environmental requirements that suppliers must comply with. The tools necessary to screen new suppliers in accordance with these standards are being developed, with an expected launch date of FY18.
Human Rights Grievance Mechanisms			
Disclosure on Management Approach	DMA: Responsible Supply Management		
G4-HR12: Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms.	Responsible Supply Management, page 26	Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms.	The information is currently unavailable. At this time, we do not track human rights grievances for our suppliers. We do not plan to collect this specific information but expect our suppliers to follow local laws and regulations.

INDICATORS BY ASPECTS	RESPONSE	IDENTIFIED OMISSIONS	EXPLANATION FOR OMISSIONS
CATEGORY: SOCIAL			
SOCIETY			
Local Communities			
Disclosure on Management Approach	DMAs: Access, Financial Strength, Philanthropy		
G4-SO1: Percentage of operations with implemented local community engagement, impact assessments, and development programs.	<p>Economic Contributions to Society, page 9</p> <p>Access – Economic Value, pages 17–18</p> <p>Access – Expanding Global Access, pages 18–20</p>	Percentage of operations with implemented local community engagement, impact assessments, and development programs.	<p>The information is currently unavailable.</p> <p>At this time, we do not quantify local community engagement activities as a percentage of operations and do not have plans to do so. Our products and therapies are available to patients all over the world. Our efforts to increase access through business and philanthropy are global. In addition, our philanthropic activities focus on where we have the largest employee presence, as well as medically underserved communities where we believe we can reduce barriers to care. We collaborate with local governments, health systems, companies, and nonprofit organizations to assess local needs and develop locally appropriate healthcare solutions.</p>

INDICATORS BY ASPECTS	RESPONSE	IDENTIFIED OMISSIONS	EXPLANATION FOR OMISSIONS
CATEGORY: SOCIAL			
SOCIETY			
Anti-Corruption			
Disclosure on Management Approach	DMA: Ethics in Sales and Marketing		
G4-SO4: Communication and training on anti-corruption policies and procedures.	Ethics in Sales and Marketing – Countering Corruption, page 29 Ethics in Sales and Marketing – Responsible Marketing to Customers and Patients, page 30 Governance and Engagement – Ethical Workplace, pages 33–34		
G4-SO5: Confirmed incidents of corruption and actions taken.	Ethics in Sales and Marketing – Ethical Business Conduct, page 29 Governance and Engagement – Ethical Workplace, pages 33–34	Confirmed incidents of corruption and actions taken.	The information is currently unavailable. Medtronic tracks the total number of employees terminated for ethics- and compliance-related lapses. This information is not broken out by corruption-related activities.
Anti-Competitive Behavior			
Disclosure on Management Approach	DMA: Ethics in Sales and Marketing		
G4-SO7: Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.	Legal actions for material issues can be found in our 2017 Form 10-K		

INDICATORS BY ASPECTS	RESPONSE	IDENTIFIED OMISSIONS	EXPLANATION FOR OMISSIONS
CATEGORY: SOCIAL			
PRODUCT RESPONSIBILITY			
Customer Health and Safety			
Disclosure on Management Approach	DMAs: Product Quality, Trial Data, Device Security, Post-Market Surveillance		
G4-PR1: Percentage of significant products and service categories for which health and safety impacts are assessed for improvement.	Product Quality – Responsibility for Quality, pages 21–22 Product Quality – Maintaining Quality Facilities, page 22 Product Quality – Product Use and Performance, pages 22–23		
G4-PR2: Total number of incidents of noncompliance with regulations and voluntary codes concerning health and safety impacts of products and services during their lifecycle, by type of outcomes.	Product Quality – Maintaining Quality Facilities, page 22 Product Quality – Product-Related Regulatory Actions, page 23		
Product and Service Labeling			
Disclosure on Management Approach	DMA: Product Quality, Ethics in Sales and Marketing		
G4-PR4: Total number of incidents of noncompliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.	In FY17, we had 13 field actions related to product labeling. Medtronic is committed to resolving all regulatory action and field corrective action issues swiftly and effectively. When field corrective actions occur, our expertise in quality management enables us to implement the required program efficiently. We take all necessary steps to correct or remedy the root cause of any problems that occur, and have systems in place to prevent future field corrective actions.		

INDICATORS BY ASPECTS	RESPONSE	IDENTIFIED OMISSIONS	EXPLANATION FOR OMISSIONS
CATEGORY: SOCIAL			
PRODUCT RESPONSIBILITY			
Marketing Communications			
Disclosure on Management Approach	DMA: Ethics in Sales and Marketing		
G4-PR7: Total number of incidents of noncompliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by type of outcomes.	Ethics in Sales and Marketing – Responsible Marketing to Customers and Patients, page 30		
Customer Privacy			
Disclosure on Management Approach	DMA: Device Security		
G4-PR8: Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	Medtronic responds to all data privacy and security incidents according to applicable local laws and Medtronic policy.	Complaints received concerning breaches of customer privacy.	The Standard Disclosure or part of the Standard Disclosure is not applicable.
Compliance			
Disclosure on Management Approach	DMA: Product Quality		
G4-PR9: Monetary value of significant fines for noncompliance with laws and regulations concerning the provision and use of products and services.	<u>2017 Form 10-K</u>		

**SUSTAINABILITY
ACCOUNTING
STANDARDS BOARD**
(SASB) INDEX

MEDICAL EQUIPMENT AND SUPPLIES

PRODUCT SAFETY

SASB CODE	METRIC	RESPONSE
HC0201-01	List of products recalled.	Reported in Product Quality > Product Use and Performance > Product-Related Regulatory Actions, page 23
HC0201-02	List of products listed in the FDA's MedWatch Safety Alerts for Human Medical Products (Medical Devices) database.	Reported in Product Quality > Product Use and Performance > Product-Related Regulatory Actions, page 23 FDA's MedWatch Safety Alerts for Human Medical Products database

ETHICAL MARKETING

SASB CODE	METRIC	RESPONSE
HC0201-04	Description of legal and regulatory fines and settlements associated with false marketing claims, including Federal Food, Drug, and Cosmetic Act violations for off-label marketing prosecuted under the False Claims Act. Dollar amount of fines and settlements and a description of corrective actions implemented in response to events.	Partially reported in Ethics in Sales and Marketing > Ethical Business Conduct > Responsible Marketing to Customers and Patients, page 30
HC0201-05	Description of code of ethics governing promotion of off-label use of products, including mechanisms to ensure compliance.	Reported in Ethics in Sales and Marketing > Ethical Business Conduct, pages 29–30 Governance and Engagement > Ethical Workplace, pages 33–34

AFFORDABILITY AND FAIR PRICING

SASB CODE	METRIC	RESPONSE
HC0201-06	Ratio of weighted average rate of net price increases (for all products) to the annual increase in the U.S. Consumer Price Index.	Not reported
HC0201-07	Description of how price information (such as average and median) for each product is disclosed to customers or their agents (for example, group purchasing organizations or consultants).	Partially reported in Access > Economic Value, pages 17–18

MEDICAL EQUIPMENT AND SUPPLIES

ENERGY, WATER, AND WASTE EFFICIENCY

SASB CODE	METRIC	RESPONSE
HC0201-08	Total annual energy consumed (gigajoules) and percentage renewable (for example, wind, biomass, solar).	Partially reported in Operations > Energy Use and GHG Emissions, pages 36–37
HC0201-09	Total water withdrawals and percentage from water-stressed regions — High or Extremely High Baseline Water Stress as defined by the WRI Water Risk Atlas; percentage of process water recycled.	Partially reported in Operations > Water, page 38
HC0201-10	Amount of waste (metric tons); percentage that is recycled, incinerated, and landfilled.	Partially reported in Operations > Managing Waste, pages 37–38

PRODUCT DESIGN AND LIFECYCLE MANAGEMENT

SASB CODE	METRIC	RESPONSE
HC0201-11	Description of environmental and human health considerations made at product lifecycle stages, such as design, procurement, manufacturing, distribution, use, and end-of-life, and the type and percentage of products to which efforts apply.	Partially reported in Product Stewardship > Our Approach, page 25
HC0201-12	Description of Extended Producer Responsibility (EPR) initiatives to promote manufacturer take-back, reuse, or proper safe disposal at the end of the lifecycle. Amount (by weight) of products accepted for take-back and reused, recycled, or donated, broken down by: (1) devices and equipment and (2) supplies.	Partially reported in Product Stewardship > Our Approach, page 25

CORRUPTION AND BRIBERY

SASB CODE	METRIC	RESPONSE
HC0201-13	Description of legal and regulatory fines and settlements associated with bribery, corruption, or unethical business practices, including violations of the Foreign Corrupt Practices Act and those associated with providing kickbacks to physicians. Dollar amount of fines and settlements and a description of corrective actions implemented in response to events.	Partially reported in Ethics in Sales and Marketing > Ethical Business Conduct, pages 29–30
HC0201-14	Description of code of ethics governing interactions with healthcare professionals, including mechanisms to ensure employee compliance.	Reported in Ethics in Sales and Marketing > Ethical Business Conduct, pages 29–30 Governance and Engagement > Ethical Workplace, pages 33–34

MEDICAL EQUIPMENT AND SUPPLIES

MANUFACTURING AND SUPPLY CHAIN QUALITY MANAGEMENT

SASB CODE	METRIC	RESPONSE
HC0201-15	Number and type of FDA enforcement actions taken in response to violations of current good manufacturing practices (cGMP) including: product deemed adulterated, Form 483s, suggested recall (Class I, II, III), Warning Letters, Border Alerts, license suspension or revocation, product seizure, consent decrees, criminal prosecution.	Partially reported in Product Quality > Product Use and Performance, pages 22–23
HC0201-16	Percentage of facilities and Tier I suppliers participating in third-party audit programs for integrity of supply chain and products (for example, materials, devices, packaging, etc.).	Partially reported in Responsible Supply Management, pages 26–28
HC0201-17	Description of efforts to maintain traceability within the distribution chain, particularly with respect to wholesalers, repackagers, and/or contract distributors.	Partially reported in Responsible Supply Management, pages 26–28
HC0201-18	Discussion of any existing or projected risks or constraints with obtaining raw materials (or components) within the supply chain, including those related to restricted/limited availability, political situations, local labor conditions, natural disasters, climate change, or regulations.	Partially reported in Responsible Supply Management > Conflict Minerals, page 27