

# PAY TRANSPARENCY NONDISCRIMINATION PROVISION (U.S. & PUERTO RICO)

APPENDIX II

Medtronic

## Related Policy

Global Inclusion and Equal Employment Opportunity Policy

## Appendix (Details)

### PAY TRANSPARENCY POLICY STATEMENT

Medtronic will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with Medtronic's legal duty to furnish information.