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| <p><b>Medtronic</b></p>                                                                      | <p>Medtronic<br/>Environmental, Health, Safety,<br/>and Sustainability Procedure</p> | <p>Document: PEHS 3013<br/>Version: 1.1<br/>Date: August 22, 2023<br/>Page 1 of 5</p> |
| <p><b>TITLE: Environmental, Health, Safety &amp; Sustainability Principles Procedure</b></p> |                                                                                      |                                                                                       |

**PURPOSE:** Medtronic is committed to conducting business in a safe and environmentally responsible manner that promotes the safety and protection of our employees, customers, community and the environment. The purpose of this procedure is to implement the principles of personal accountability in areas that are critical to this commitment. Consistent with the Mission, our preferred effort to drive accountability is by positive motivation of safe behaviors and responsible environmental protection, however when necessary we need to take actions to enforce our commitments.

**SCOPE:** This procedure applies to and covers all Medtronic organizations and employees worldwide. In addition, all contingent workers and agents providing services to and / or working on behalf of Medtronic are required to comply with this procedure as derived from the Global Environmental Health and Safety Policy.

This procedure is subject to any applicable law in any country where Medtronic does business. To the extent that any provision of this procedure is incompatible with any applicable law, the company will follow the applicable law.

**REQUIREMENTS:**

1. Medtronic will comply with all applicable Environmental Health and Safety (EHS) laws, regulations and other requirements to reduce risks. Medtronic implements additional safeguards for our employees' health and safety, and to protect our customers, the communities we engage in business, and the environment. Safeguards include risk elimination, engineering controls, protective equipment and administrative controls.
2. Employees are expected to participate in all assigned training, conduct their daily duties in accordance with all applicable EHS procedures, and follow standard work practices and work process. These EHS Expectations are required to ensure employee safety and protection of the environment as we fulfill the Medtronic Mission.
3. Below are the EHS Principles that, if violated, will be subject to the applicable Internal Complaints and Disciplinary Procedures in the country of employment, which may include discipline up to and including termination of employment:

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- I. Employees must not engage in any at-risk behavior which shows disregard of one's own safety, or the safety of another.
- II. Employees must comply with environmental permits, company/local procedures, local/state legal requirements and regulations, to prevent releases that can be hazardous to individuals, and/or the environment.

Medtronic has other policies that also address workplace conduct, including the Substance Testing & Abuse Policy (United States Qillyl). If violation of an EHS Principle(s) also involves a drug test under local regulation or the local Substance Policy, management and employee relations will follow the action outlined in the Substance Abuse and Testing Policy. In the event of a conflict with any other Medtronic policy, management will review the situation considering both policies and make a recommendation for disciplinary action.

4. Employees are expected to report improper EHS conduct to his/her supervisor or department head. Supervisors and managers who receive complaints of behavior prohibited by the EHS Principles must immediately report such complaints to their Environmental, Health and Safety (EHS) or Employee Relations (ER) representative, so that Medtronic can try to resolve issues internally.
5. Employee's may also report concerns anonymously to the Office of Ethics and Compliance, or Medtronic's Voice Your Concern Line. Employees may contact the Voice Your Concern Line by phone (1-800-488-3125) or via the web ([www.VoiceYourConcernLine.com](http://www.VoiceYourConcernLine.com)) and reports to this line may be made anonymously.
6. When Medtronic is made aware of conduct that may violate the EHS Principles, Medtronic will conduct a fair, timely and thorough review that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected.
7. Medtronic expects all employees to fully cooperate with any review conducted by Medtronic into a complaint of behavior prohibited by the EHS Principles. Medtronic will maintain confidentiality surrounding the review to the extent possible.
8. Upon completion of the review, appropriate action (if necessary) will be implemented. If warranted, prompt disciplinary or corrective action will be taken, which may include

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disciplinary action up to and including termination of employment. Non-employees who violate the EHS Principles will be subject to other remedies as may be appropriate.

**DEFINITIONS**

**EHS Expectations:** positive motivation to enhance employee safety and protection of the environment as we fulfill the Medtronic Mission. EHS Expectation statements and examples but nonexclusive listings of the expectations are included as Appendix 1 to this procedure.

**EHS Principles:** actions or conditions that could be immediately dangerous to the employee, adjacent employees or the environment and therefore there is no room for noncompliance.

**RESPONSIBILITIES**

Medtronic EHS, Employee Relations, the business unit and site management are responsible for the implementation of this procedure.

**REFERENCE DOCUMENTS:**


Appendix 1 EHS Expectations

**AUTHORIZATION**

| Signed by                                 | Title                                                        | Date                   |
|-------------------------------------------|--------------------------------------------------------------|------------------------|
| <p><i>Anne Monine</i><br/>Anne Monine</p> | <p>Senior Director, Environmental,<br/>Health and Safety</p> | <p>August 22, 2023</p> |

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| <p><b>Change History</b></p> |
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| <b>Document Number</b> | <b>Version</b> | <b>Date</b>      | <b>Description of Change</b> |
|------------------------|----------------|------------------|------------------------------|
| PEHS 3013              | 1              | October 23, 2018 | New Issue                    |

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## **Appendix 1 EHS Expectations**

1. We expect management to foster an environment where employees can fulfill the Medtronic Mission in a safe manner while protecting the environment.
2. We expect each employee to act safely and encourage others to act in a safe manner.
3. We expect each employee to act in a responsible manner and to ensure the established methods of protecting the environment are performed as documented.
4. In the event of an adverse incident we expect employees to report promptly, honestly and accurately.

We believe a strong EHS culture is key to our success and we want to motivate positive EHS behaviors such as:

- Addressing any unsafe action or condition when observed.
- Intervening in safety issues whether-or-not the employee is a direct report; we protect each other.
- Actively reporting all near misses so they can be corrected.
- Always wearing proper personal protective equipment for tasks performed
- Obtaining and properly executing work permits
- Always obeying the "rules of the road" (transportation/fork truck/pedestrian safety)
- Actively serving on a team to improve safety policies/procedures/etc.
- Actively improving safety by participating in training, shift safety meetings, emergency drills, risk assessments, job safety analysis, ergonomic risk assessments or process hazard analysis.
- Understanding environmental permit limitations, responding to process alarms and safe chemical handling.
- Segregating and performing proper waste management practices.
- Improving or fixing a safety housekeeping situation without being told or assigned.
- Changing behavior to provide solutions, not just pointing out problems

In addition to motivating positive behaviors we also recognize that there are some behaviors that cause risk of injury to self or others and harm to the environment. These behaviors must be addressed expeditiously and decisively. Further detail and examples of the EHS Principles include but are not limited to:

1. Employees are not to remove guards or other safety devices including bypassing a critical safety or environmental interlock/control without proper authorization.
2. Employees are required to obtain a work permit and comply with the terms of a work permit or applicable procedures under the scope of a lock out, fall protection, confined space, hot work and electrical work.

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3. Employees are not to text (reading and composing) while operating a vehicle or participate in other forms of communication that distract the driver from focusing on their responsibilities.
4. Employees are not to operate a vehicle while under the influence of drugs or alcohol. Impaired driving is specifically defined within various jurisdictions and this issue is also raised in the Substance Testing and Abuse Policy.
5. Employees shall follow the Biological Safety Infectious/Communicable Disease Prevention standards. Employees are required to obtain vaccinations or complete a vaccination declination form. Employees are required to follow universal precautions and proper management of used sharps
6. Employees are required to wear assigned personal protective equipment. Proper use of protective equipment mitigates injury when unplanned but foreseeable incidents occur.
7. Employees are required to wear personal monitoring equipment (radiation dosimetry) to identify exposure when working in recognized ionizing radiation exposure areas. Employees should avoid all ionizing radiation exposure, but if they must enter exposure areas then appropriate lead shielding and dosimetry are our only methods to reduce their exposure. Failure to submit dosimetry badges for analysis prevents evaluation of exposure risk as well as loss of credentials.