

Brazil Local Anti-Corruption and Anti-Bribery Policy

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1. Purpose

The Medtronic Mission commits us to being “a company of dedication, honesty, integrity, and service.” The payment of bribes and other illegal or unethical payments, or engagement in unethical conduct, is contrary to Medtronic’s corporate identity and to the values set forth in our Mission. Corrupt conduct harms patients, weakens our business, damages our reputation, and undermines the ability of all medical device companies to compete fairly in the global marketplace and in Brazil.

This Brazil Local Anti-Corruption and Anti-Bribery Policy (“Policy”) aims to:

- Establish guidelines for the prevention, detection, and response to acts of bribery;
- Supplement and locally adapt the provisions of Medtronic’s Global Anti-Corruption and Anti-Bribery Policy; and
- Incorporate within its scope the requirements of Medtronic Brazil’s Anti-Bribery Management System (“ABMS”), pursuant to ABNT NBR ISO 37001:2025.

2. Scope and Target Audience

This Policy applies to all Medtronic Employees and Business Partners in Brazil. All Employees and Business Partners are required to read and comply with this Policy, as well as with all related guidance and interpretive procedures issued by Medtronic’s Global Office of Ethics, Privacy and Compliance, and to take affirmative steps to ensure that their actions are consistent with this Policy.

The documents referenced in this Policy may be accessed through Medtronic’s Internal Policy Portal or through the applicable external channels. For further information, please refer to Section 6.

3. Policy Statement (Details)

All Medtronic Employees and Business Partners must act in strict compliance with applicable anti-corruption and anti-bribery laws relevant to their activities, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, Brazilian Law No. 12,846/2013 (Brazilian Anti-Corruption Law), its implementing regulations, and all other Brazilian laws and regulations applicable to the prevention and enforcement of acts harmful to the domestic or foreign Public Administration.

No Employee or Business Partner may offer, pay, promise to pay, or authorize the payment or provision of money or Anything of Value to any Customer, Government Official, government entity, or any other Third Party for the purpose of obtaining any improper business advantage.

Note: This Policy applies regardless of whether the payment is ultimately made or the Anything of Value is actually provided, and regardless of whether any improper business advantage is effectively obtained. Furthermore, this Policy prohibits corrupt payments to Customers, Government Officials, INCLUDING any other Third Parties, even where such parties are not Customers or Government Officials. No payment or other transfer of Anything of Value within the scope of this Policy may be made to a Customer, Government Official, or Third Party under the laws of the local country without prior written approval from the country compliance officer.

3.1. Principles and Basic Rules

All payments and other activities covered by this Policy must be accurately, timely, and fully recorded in Medtronic's books and records. False, misleading, incomplete, inaccurate, or artificial documentation, reporting, or recording of payments or activities is strictly prohibited.

This Policy supplements Medtronic's Code of Conduct ("The Compass"), the Global Anti-Corruption and Anti-Bribery Policy, the Global Business Conduct Standards Policy ("BCS"), the Expense and Investment Authorization Policy ("501"), the Records Retention Schedule, the Global Channel Compliance Policy, and the Brazil Anti-Bribery Management System Manual, all of which remain in full force and effect.

3.2. Management and Expectations of Business Partners

Medtronic may engage Business Partners only if all of the following requirements are met:

- There is a legitimate and documented business need for the goods and services provided;
- The goods and services are not priced above fair market value;
- The Third Party has completed the appropriate due diligence process prior to commencing work on behalf of the company, in accordance with the applicability criteria established in the Brazil Integrity Due Diligence SOP;
- All agreements with the Third Party must be formally executed in writing, using appropriate contractual language and including Medtronic's anti-bribery and anti-corruption provisions; and
- Any red flags or concerns identified during the due diligence process must be appropriately addressed before the partnership is formalized.

3.3. Conflict of Interest Management

Medtronic recognizes that actual, potential, or perceived conflicts of interest may compromise impartial decision-making and create significant risks of bribery, fraud, or other improper practices.

Accordingly, the provisions of the Global Conflict of Interest Policy fully apply within Medtronic Brazil and establish guidelines for the identification, disclosure, assessment, and proper management of such situations. All Employees are required to timely disclose any actual, potential, or perceived conflicts of interest through the corporate channels and tools made available for this purpose.

Disclosed conflicts of interest will be assessed and managed by the leadership of the area to which the Employee is assigned, in accordance with applicable internal guidelines and, where appropriate, with the support of Medtronic Brazil's Compliance function. Based on the assessment performed, appropriate mitigation measures proportionate to the identified risk may be defined and formally documented.

Business Partners must also promptly disclose any situations that may constitute a conflict of interest within the scope of their relationship with Medtronic Brazil, through formal communication directed to the respective Medtronic business representatives responsible for managing the contractual relationship.

3.4. Anti-bribery Awareness

Medtronic Brazil shall ensure the implementation of ongoing anti-bribery and anti-corruption awareness and training initiatives, as established in the Brazil Anti-Bribery Management System Manual.

3.5. Sponsorships, gifts, travel, and hospitality

In a business context, gifts may constitute an appropriate means for business professionals to demonstrate mutual respect. Medtronic expects good judgment and moderation to be exercised when offering or receiving entertainment or gifts.

The provision of gifts, meals, travel, or entertainment to any individual (including Government Officials or Customers) in exchange for any improper favor or benefit is strictly prohibited. In addition, cash gifts or cash equivalents, such as gift cards, are prohibited.

Medtronic complies with applicable industry codes of ethics regarding modest-value gifts to an HCP or an HCP's immediate family member in jurisdictions where there is a strong cultural custom. Such items are generally prohibited under most industry codes.

Employees may provide modest-value items with a genuine educational purpose or that benefit patients (e.g., textbooks or anatomical models) to HCPs. Such items must be reported, where required, in accordance with applicable local transparency regulations.

The guidelines set forth in the Brazil Anti-Bribery Management System Manual and the Brazil Gifts, Presents, and Hospitality SOP shall apply with respect to the offering of gifts, entertainment, travel, and hospitality.

3.6. Political Contributions

It is strictly prohibited to make Political Contributions for the purpose of improperly influencing a Government Official or obtaining any improper favor or benefit.

Any matters relating to Political Contributions must be directed to the Government Affairs representative responsible for the relevant country or region.

3.7. Charitable Contributions

It is strictly prohibited to provide charitable donations for the purpose of improperly influencing a Government Official or obtaining any improper favor or benefit. However, donations made directly to a government agency (rather than to an individual government official) as part of a charitable initiative may be permissible. All charitable contributions must be approved through the applicable local approval process and must be accurately recorded in Medtronic's books and records.

In addition, Medtronic may provide monetary donations or donate its technologies for educational, scientific, or other philanthropic purposes. Medtronic Employees must not make monetary or product donations:

- To HCPs;
- To influence an HCP's judgment;
- To reward prior purchases or induce future purchases of Medtronic technologies; or
- During a restricted period established under local bidding processes or other applicable laws and regulations.

Please refer to the Global Business Conduct Standards Policy and related regional procedures for further details.

3.8. Anti-Money Laundering

Money laundering is a widespread global issue with serious consequences. This crime is defined as the process of concealing illegal proceeds in order to make funds appear legitimate. It is important to note that this practice is not limited to cash transactions.

Complex business transactions may conceal the financing of criminal activities such as terrorism, narcotics trafficking, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation, and may subject Medtronic and individuals to severe sanctions. Our company prohibits knowingly engaging in transactions that facilitate money laundering or result in the unlawful diversion of funds.

Anti-money laundering laws in the United States and other countries, as well as international organizations, require transparency in payments and the identification of all parties involved in transactions. We are committed to full compliance with anti-money laundering laws worldwide and will conduct business only with reputable Customers engaged in legitimate business activities and transactions.

We must remain attentive to the following red flags:

- Requests for payment in cash, traveler's checks, or checks issued by unknown Third Parties;
- Complex payment patterns;
- Unusual transfers to or from countries unrelated to the transaction;
- Customers who appear unwilling to comply with accounting requirements;
- Transactions involving jurisdictions associated with money laundering or tax evasion; and
- Transactions inconsistent with ordinary business practices or that do not align with the normal activity patterns of Customers or consumers.

3.9. Hiring Practices

An offer of employment or an internship, whether paid or unpaid, may also constitute something of value or an attempt to obtain an improper advantage under the FCPA, the UK Bribery Act, or the Brazilian Anti-Corruption Law. Accordingly, any offer of employment by Medtronic to an individual known to have a relationship with a Government Official, or to a person or entity involved in business with Medtronic arising directly or indirectly from recommendations made by a Government Official, must be carefully evaluated to ensure compliance with applicable employment criteria, confirm that it is not intended to improperly benefit a Government Official, ensure consistency with the applicable Conflict of Interest Policy, and verify compliance with Medtronic's Hiring Policy.

The guidelines set forth in the Brazil Anti-Bribery Management System Manual and the Brazil Integrity Due Diligence SOP shall apply with respect to the engagement of Employees and Business Partners.

3.10. Compliance and Penalties

Failure to comply with this Policy and any related interpretive guidance issued by Medtronic's Global Office of Ethics, Privacy and Compliance may result in disciplinary action, up to and including termination of employment or contractual relationship for Employees and Business Partners.

In addition, individuals who violate applicable anti-corruption laws may be subject to sanctions imposed by governmental authorities for misconduct.

3.11. Reporting and non-retaliation

Employees, officers, directors, and Business Partners must report any activity they reasonably and in good faith believe to constitute an actual or potential violation of this Policy to their managers, business contacts, Compliance representatives, Legal partners, or through the Voice Your Concern line at 0800-892-0686 or through the website VoiceYourConcernLine.com. Information may be reported anonymously.

Medtronic prohibits retaliation against any individual who, in good faith, reports suspected misconduct. Any questions regarding this Policy, as well as any related interpretive guidance, should be directed to your local Compliance leader or, in the case of Business Partners, to your local Medtronic contact. A list of Compliance contacts is available through the Global Legal/Compliance Contacts directory.

4. Roles and Responsibilities

Role	Responsibilities
Senior Management and Leadership	- Senior Management demonstrates active leadership and unequivocal commitment to the prevention of bribery and corruption, ensuring the implementation, maintenance, and continuous improvement of the ABMS, as well as the allocation of adequate resources for its effectiveness. The responsibilities of Senior Management are further supplemented by the provisions of the Brazil Anti-Bribery Management System Manual. - Leadership must act as an example of ethical conduct within Medtronic Brazil, based on the principle of tone from the top, fully adhering to the guidelines set forth in this Policy and positively influencing organizational behavior and the ethical achievement of business results. No business objective may override legal obligations or the integrity standards established by Medtronic.
Anti-Bribery Function	- The Anti-Bribery Function in Brazil has the independence, autonomy, and authority necessary to perform its responsibilities and duties, as defined in the Brazil Anti-Bribery Management System Manual. - In carrying out its responsibilities, the Anti-Bribery Function is supported operationally by Medtronic Brazil's Compliance department, without prejudice to its technical and functional autonomy specifically ensured by Senior Management.

Role	Responsibilities
Medtronic Brazil Employees and Business Partners	• All Medtronic Brazil Employees and Business Partners are responsible for fully complying with the requirements of this Policy, the Brazil Anti-Bribery Management System Manual, Medtronic's global policies, and applicable laws and regulations. • They are expected to act with diligence, integrity, and transparency in all business interactions, whether public or private, and any conduct that may constitute bribery, an improper business advantage, or a corrupt practice is expressly prohibited. • Employees must promptly report any suspicions or violations through the appropriate channels, and protection against retaliation is guaranteed for reports made in good faith. • Compliance with the provisions of this Policy constitutes an essential condition for maintaining an employment or contractual relationship with Medtronic Brazil.

5. Abbreviations, Acronyms, and Definitions

Anything of Value: Money or any item with actual or perceived value provided directly or indirectly to a Customer, Government Official, or other Third Party. "Anything of Value" includes, but is not limited to:

- Cash;
- Discounts;
- Rebates;
- Use of materials, equipment, software, or facilities;
- Benefits;
- Gifts;
- Travel and lodging;
- Grants, donations, and research support;
- Sponsorships;
- Contractual arrangements;
- Loans;
- Tickets and entertainment; and
- Promises of employment.

There is no minimum threshold exception for what constitutes value.

Promotional Item (Brinde): Any low-value item distributed broadly, without an individualized recipient, for institutional, promotional, or educational purposes, usually containing Medtronic branding.

Customers: Any person other than an individual patient, including, but not limited to, any physician, healthcare professional, or healthcare entity in a position to purchase, lease, recommend, use, influence, arrange the purchase or lease of, or prescribe Medtronic products.

Conflict of Interest: Any situation in which an Employee's personal, financial, or relational interests may interfere, or appear to interfere, with the impartial, objective, and loyal performance of their duties toward Medtronic, classified as follows:

- a) *Actual Conflict of Interest:* when there is an effective conflict between personal interests and Medtronic's interests, compromising or potentially compromising the Employee's independent judgment;
- b) *Potential Conflict of Interest:* when the situation does not yet constitute a concrete conflict but contains elements that may evolve into an actual conflict if not properly managed;
- c) *Perceived Conflict of Interest:* when, even in the absence of an actual conflict, the situation may reasonably be perceived by Third Parties as compromising the impartiality or integrity of a professional decision.

Employees: Any natural person maintaining an employment or functional relationship with Medtronic, regardless of the nature of the contract, including, without limitation, permanent employees, temporary workers, apprentices, interns, officers, managers, statutory directors, members of Senior Management, and any other persons acting under the direction, supervision, or on behalf of Medtronic.

Government Official/Public Official: Any individual who holds, even temporarily or without compensation, a public office, employment, or function by appointment, election, designation, hiring, or any other form of investiture within a direct or indirect domestic or foreign Public Administration entity. This definition includes, without limitation:

- Customers, physicians, administrators, clinical investigators, and other Employees of public hospitals or government-affiliated entities;
- Customers with government appointments, such as serving on government-sponsored boards or panels;
- Customs officers or Employees;
- Procurement officers or Employees;
- Licensing or permitting officers or Employees;
- Product registration officers or Employees;
- Tax officials or Employees;
- Elected or appointed government officials; and
- Family members of any person considered a "foreign government official."

Government/Public Administration: Any domestic or foreign Public Administration body, agency, governmental organization, subdivision, or other entity of any nation, state, or local government, including hospitals and other healthcare facilities owned or operated by a government, regulatory agencies, or government-controlled businesses, corporations, enterprises, or partnerships.

HCP (Healthcare Professional): Broadly and collectively includes healthcare service providers; members of healthcare organization staff; family members of Healthcare Professionals when in a position to influence decisions related to the acquisition or use of Medtronic technologies; any other individuals capable of directly recommending or materially influencing purchasing or utilization decisions involving Medtronic technologies; as well as any persons falling within the scope of transparency obligations. In general, such individuals are in a position to prescribe, purchase, lease, recommend, use, arrange for the acquisition of, or materially influence purchasing decisions involving Medtronic technologies.

HCO (Healthcare Organization): Collectively includes entities involved in the provision of healthcare services, including, but not limited to, hospitals, universities, medical clinics, home healthcare agencies, and

government agencies; entities incorporated or owned by Healthcare Professionals to provide personal consulting services (e.g., LLCs); organizations led or managed by Healthcare Professionals or whose members include Healthcare Professionals, including, but not limited to, patient advocacy groups, medical societies, and professional organizations; any organization affiliated with a Healthcare Organization or Healthcare Professional if it is in a position to influence the decision to purchase or use Medtronic Technologies; any other entities capable of directly recommending or substantially influencing the decision to purchase or use Medtronic Technologies; and any other entities subject to transparency reporting requirements. These entities are generally in a position to prescribe, purchase, lease, recommend, use, arrange the purchase or lease of, or substantially influence purchasing decisions involving Medtronic Technologies.

Hospitality: A courtesy of an institutional or business nature consisting of the offering or receipt of expenses related to transportation, meals, lodging, entertainment, or participation in events, provided that it is connected to a legitimate business, educational, or scientific purpose and is not intended to directly or indirectly influence decisions or obtain an improper advantage.

Applicable Legislation: The set of national and international laws, regulations, and standards applicable to Medtronic's business activities, including, but not limited to, the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010, and Brazilian Law No. 12,846/2013 (Brazilian Anti-Corruption Law), as well as any other legal or regulatory provisions related to the prevention, detection, and combating of corruption, bribery, and unlawful practices.

Books and Records: All information and transactions contained in Medtronic's accounting systems or other financial, contract management, or data management systems, including all supporting documentation related to such transactions.

Patient: A natural person who receives, has received, or is eligible to receive healthcare, treatment, or health services, including the direct or indirect use of medical technologies, regardless of whether they maintain a contractual relationship with Medtronic. Patients generally do not exercise a professional or institutional role within the decision-making chain related to the acquisition of medical technologies and are characterized as the final recipients of healthcare services.

Business Partners: Any natural or legal person that is not part of Medtronic's Employee workforce but maintains or may maintain a commercial, contractual, or institutional relationship with the company, including, without limitation, suppliers, service providers, distributors, commercial representatives, consultants, intermediaries, agents, subcontractors, and any other parties acting on behalf of, in the interest of, or for the benefit of Medtronic.

Gifts: Any good, benefit, or item of economic value offered or received on a non-generalized basis and intended for a specific person, which does not qualify as a Promotional Item and which, due to its nature or value, may create the perception of favoritism or improper influence, and must therefore strictly comply with the limits and criteria established in this Policy.

Bribery: When one party grants or offers to another party, directly or through an intermediary, any reward, advantage, or benefit of any kind in order to influence the making, omission, or implementation of a decision or action in favor of the interested party.

Business Advantage: Includes, but is not limited to:

- Obtaining or retaining business for Medtronic or Business Partners;
- Directing business to Medtronic or Business Partners;
- Securing approvals or permits necessary for the development, testing, manufacturing, sale, distribution, importation, or exportation of Medtronic products; and
- Securing favorable tax treatment for Medtronic.

Improper Business Advantage: Any business advantage secured or intended to be secured for Medtronic through the offering of Anything of Value to a Customer, Business Partner, Government Official, or other Third Party, except where specifically permitted under Medtronic policies, such as the Global Business Conduct Standards or the Government Affairs Compliance Policy.

Voice Your Concern: Medtronic's official reporting channel, made available for Employees, Business Partners, and other stakeholders to report, in good faith, suspected or actual conduct that violates the Code of Conduct, internal policies, or applicable laws.

Reports may be submitted confidentially and, where permitted by local law, anonymously, by telephone at 0800-892-0686 or through the website [VoiceYourConcernLine.com](https://www.medtronic.com/voiceyourconcern).

The channel allows concerns to be reported confidentially and, where permitted by local law, anonymously, while ensuring protection against retaliation. Reports received are referred to the appropriate functions for review and investigation in accordance with Medtronic's internal procedures.

Third Party(ies): Any natural or legal person that does not maintain any contractual relationship, formal engagement, or established relationship with Medtronic, even if such party is in a prospecting, negotiation, or pre-engagement phase.

6. References & Related Policies

Reference ID	Title
<u>Internal:</u> Medtronic Policy Portal. <u>External:</u> Medtronic Website .	Code of Conduct ("The Compass")
<u>Internal:</u> Medtronic Policy Portal. <u>External:</u> Medtronic Website .	Global Business Conduct Standards Policy (BCS)
<u>Internal:</u> Medtronic Policy Portal. <u>External:</u> Medtronic Website .	Global Voice Your Concern Policy
<u>Internal:</u> Medtronic Policy Portal.	Global Expense and Investment Authorization Policy (501)
<u>Internal:</u> Medtronic Policy Portal.	Medtronic Brazil Anti-Bribery Management System Manual

<u><i>Internal:</i></u> Medtronic Policy Portal.	Brazil Local Policy on Interactions with Government Officials
<u><i>Internal:</i></u> Medtronic Policy Portal.	Brazil Corporate Investigations Standard Operating Procedure
<u><i>Internal:</i></u> Medtronic Policy Portal.	Brazil Integrity Due Diligence Standard Operating Procedure
<u><i>Internal:</i></u> Medtronic Policy Portal.	Brazil Gifts, Presents, and Hospitality Standard Operating Procedure

7. Policy Contacts

Contact	Role
Policy Sponsor	Senior Management of the Brazil Anti-Bribery Management System
Policy Owner	Brazil Compliance Department
Policy Contact	Brazil Compliance Department: rs.brzcompliance@medtronic.com

8. Documentation History

Date	Revision	Reason/Description
April 17, 2026	1.0	Initial approval of the Policy by the Senior Management of Medtronic Brazil's ABMS.