



Responsible Minerals Policy Statement

As reflected in the Medtronic Mission, we strive to contribute to human welfare through the application of biomedical engineering to alleviate pain, restore health, and extend life. We also seek to maintain good citizenship as a company. In the spirit of our Mission, we aspire to obtain the minerals necessary to manufacture our products only from socially responsible sources. We prohibit the use of forced or child labor in our operations and supply chain and expect our suppliers to comply fully to our [Global Supplier Standards](#) and the growing global regulations we are required to observe.

We recognize that some of the minerals we use in our products, such as tin, tantalum, tungsten, and gold (also known as 3TG's) and cobalt, may originate from conflict-affected and high-risk areas (CAHRAs), where there is a risk of contributing to armed conflict, human rights abuses, or environmental degradation.

We support the goals and objectives of Section 1502 of the Dodd-Frank Act that requires public companies to determine the sourcing of conflict minerals used in their products and to file an annual report disclosing any such use. We also adhere to and follow the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance), and we comply with the relevant laws and regulations in the countries where we operate.

Medtronic has committed to the following:

- Monitor and evaluate our suppliers' performance and compliance with this policy.
- Exercise due diligence with relevant suppliers in accordance with the OECD Guidance.
- Encourage smelters and refiners in our supply chain to successfully complete the Responsible Minerals Assurance Process (RMAP).
- Request our relevant suppliers who identify high risk smelters/refiners to remove them from their supply chains.
- Report on our due diligence activities and progress to our customers, investors, regulators, and other stakeholders.

What Medtronic requires of our suppliers:

- Create and maintain a publicly available responsible minerals policy consistent with the OECD Guidance.
- Source minerals from smelters/refiners that are validated to be conformant by independent third-party audit programs, such as the Responsible Minerals Assurance Process (RMAP) or equivalent.
- On an annual basis, identify and assess sources of minerals using industry standard tools and templates such as the Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Reporting Template (EMRT).
- Extend these requirements and expectation to all their supply chain.
- Respond to Medtronic inquiries for due diligence information, and promptly implement corrective actions identified by Medtronic.

In addition, we expect our suppliers to conduct business operations in an ethical manner and comply with all applicable laws related to environmental responsibility, workplace health and safety, and human resources. If sourced ethically, the mining of 3TG's and other minerals of concern can contribute to communities that are dependent on mineral extraction through responsible mineral sourcing. If we determine that a supplier in our supply chain violates on the above requirements, we will attempt to remediate the violation. We may also terminate business relationships with suppliers that do not promptly take steps to comply with this policy.

Medtronic

If you have specific questions regarding this policy, please contact us at rs.conflictminerals@medtronic.com

For suppliers and other external parties, you are encouraged to contact us at the confidential Voice Your Concern Line at www.VoiceYourConcernLine.com. This website includes toll-free phone numbers for the Voice Your Concern Line in the U.S. (800-488-3125) and other countries.

Updated November 2023