

# GLOBAL SUPPLIER STANDARDS

Medtronic

At Medtronic, our Mission is to alleviate pain, restore health, and extend life. Our [Code of Conduct](#) which details the ethical standards and framework under which we conduct and manage our business, governs the work we do every day. Our Code of Conduct sets forth the foundation for our standards and expectations in the workplace.

We hold our Suppliers to the same high standards of business conduct and social and environmental responsibility. We expect our Suppliers to:

- Comply with the laws, rules, and regulations of the countries in which they operate
- Uphold the human rights of their workers and comply with the Medtronic's [Global Human Rights and Labor Standards Policy](#)
- Ensure a safe and healthy workplace
- Practice social and environmental responsibility
- Demonstrate the highest standards of business ethics

Our Global Supplier Standards outline the minimal requirements and expectations for ethical and sustainable business conduct. They apply to Suppliers, agents and contract manufacturers (collectively referred to as "Suppliers") involved in the conduct of Medtronic business globally. As Suppliers deliver goods or services to Medtronic, they are certifying their compliance to these standards. We reserve the right to evaluate, audit, and inspect Suppliers' facilities, operations, and records at any time to make sure they are in compliance. Medtronic reserves the right to take appropriate Supplier action up to termination of the business relationship as a result of violation of these standards.

## ETHICAL BEHAVIOR

- **Anti-Corruption**  
All Suppliers must fully comply with anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), and anti-money laundering laws of the countries in which Medtronic operates. Medtronic does not allow any bribes or improper payments, including kickbacks, unexplained rebates, payment for advertising, or gifts disguised as allowances or expenses.
- **Confidentiality**  
Suppliers are expected to protect Medtronic proprietary and confidential information — and must enforce policies that comply with the confidentiality of the information.
- **Conflict of Interest**  
Suppliers should avoid any transactions, relationships, or other acts that appear to be conflicts of interest.
- **Conflict Minerals**  
Suppliers are expected to comply with the Medtronic [Conflict Minerals Policy](#), which commits to compliance with the Dodd-Frank Act.

- **Fair Competition and Antitrust**

Suppliers are expected to conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they operate or to which they are subject as a result of their business operations.

- **Intellectual Property**

Suppliers must safeguard Medtronic intellectual property rights and confidential information. Any use, disclosure and handling of Medtronic's technology, knowledge, and other Medtronic intellectual property must be in accordance with any applicable agreements.

- **Legal Compliance**

Suppliers must fully comply with all applicable national, state, and/or local laws, regulations, and ordinances. Suppliers must also be fully compliant with their obligations to any applicable agreement, understanding, or other binding commitment.

- **Policy on Gifts**

Medtronic employees may not accept gifts from any Supplier if the gift is more than modest in value, or if accepting the gift could create the appearance of a conflict of interest.

- **Privacy**

Suppliers are required to protect the personal information of their business partners, customers, patients, and others they do business with.

- **Animal Welfare**

Suppliers shall meet the same high standards of respectful, humane treatment of animals that Medtronic does. These standards govern the general use of animals in training and research, including continuing efforts to replace and reduce their use with technological advances. The standards and protocols are published in our [Policy Regarding Use of Animals](#) and [Feasibility Assessment of Eliminating the Use of Animals for Training Purposes](#).

## **ENVIRONMENTAL STEWARDSHIP**

Medtronic expects its Suppliers to conduct business in ways that help preserve and protect the environment, and demonstrate accountability and transparency in sustainability performance.

- **Compliance**

Suppliers must fully comply with all applicable environmental laws. Medtronic requires notification of any significant compliance violations.

- **Conservation**

Suppliers are expected to proactively monitor their environmental impacts through policies and programs that conserve natural resources, reduce greenhouse gas emissions, eliminate waste, reuse and recycle materials, promote the purchase of sustainable products and services, and promote sustainable construction and building modifications.

- **Hazardous Materials Management**

Suppliers must implement policies related to safe management of hazardous materials and the legal prohibition or restriction of specific substances. They are also required to provide information on substances used for their parts or components as identified in the Medtronic Materials of Concern List.

## SOCIAL RESPONSIBILITY

Medtronic strives to have a positive impact in the communities where it operates. We promote basic human rights and comply with all laws that govern labor practices, working hours and conditions, wages, and other issues that affect workers' health and safety.

Medtronic expects the same high commitment to social responsibility from its Suppliers. We require our Suppliers to comply with our [Global Human Rights and Labor Standards Policy](#) and our [Environmental Health and Safety Policy](#).

- **Child Labor**

Medtronic prohibits the use of any child labor. Suppliers must only use workers who meet the minimal legal age for employment as defined by local law where they work, as well as for the type of work.

- **Equal Opportunities**

Suppliers must provide equal employment opportunity and fair and equal treatment to people regardless of their age, disability, nationality, pregnancy and maternity, race, gender, sexual orientation or legal status. Equal opportunity must extend to all employment decisions, including recruiting, hiring, training, promotions, compensation, benefits, transfers and workforce reductions.

- **Fair Compensation**

Suppliers must comply with all applicable national legal standards with regards to minimum wages, overtime, and maximum hour rules that are established by laws and regulations in operating regions.

- **Recruitment**

Suppliers must practice ethical recruitment (directly or through third-party agencies) and avoid worker exploitation through the recruitment process. Suppliers must: prohibit confiscation of workers' identity documents; provide workers with a written document stating the terms and conditions of employment at the point of recruitment in a language the job-seeker can understand; and prohibit payment of recruitment fees by workers or require repayment when fees have been paid. Suppliers shall ensure that the third-party recruitment agencies are compliant with the provisions of this document and the law.

- **Forced Labor**

Medtronic prohibits the use of slavery and human trafficking in Suppliers' facilities and operations, as well as the use of any form of forced, coerced, bonded, indentured, or prison labor.

- **Freedom of Association and Collective Bargaining**

Suppliers must respect the rights of workers, without distinction, to form or join trade unions of their choosing and to bargain collectively.

- **Health & Safety**

Suppliers must provide a healthy, sanitary, and safe environment for their workers that is free from physical, emotional, and verbal harassment, or any other abusive or threatening behavior. They are required to implement policies that prohibit the use of illegal weapons, alcohol, and illegal drugs and other controlled substances in the workplace. Additionally, they shall have in place measures that prevent workers' exposure to safety hazards, monitor workplace injuries and illness, and ensure emergency preparedness. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

Accommodation, where provided or arranged, shall meet local safety and housing standards and will be clean, safe, and meet the basic needs of the workers. Suppliers will assign responsibility for health and safety to a senior management representative and must notify Medtronic of any significant health and safety violations and take immediate actions to resolve them.

- **Supplier Diversity**

Medtronic is committed to including qualified small and diverse Suppliers in its sourcing processes and supply chain. It expects all Suppliers to support this commitment by deploying strategies and programs to increase sourcing opportunities for small and diverse businesses, where applicable.

## **BUSINESS CONDUCT**

- **Management Systems**

Medtronic expects Suppliers to have systems in place that manage product quality, environmental impact, labor standards, health and safety risks, ethical business conduct, continuity risks, and continuous improvement. Suppliers must have adequate training programs for employees to ensure the appropriate level of knowledge and skills to meet the standards specified in these areas. They must also make these requirements with their own Suppliers.

- **Publicity**

Medtronic does not allow Suppliers to use its name or logo in any public display or document without written approval in advance. In addition, without Medtronic approval, Suppliers may not disclose their relationship with Medtronic, products, parts, designs or any non-public information in any public venues, including press releases, websites, social media, trade shows and Suppliers' facilities.

- **Transparency**

Suppliers shall remain transparent about their business activities, structure, financial situation, performance, and business as required by any applicable laws and industry standards.

## **MEDTRONIC OFFICE OF ETHICS AND COMPLIANCE**

If Suppliers and other external parties desire to report concerns regarding issues outlined in this document, they are encouraged to contact Medtronic at the confidential Medtronic Voice Your Concern Line at [www.voiceyourconcernline.com](http://www.voiceyourconcernline.com). This website includes toll-free numbers for the Voice Your Concern Line in the US (800-488-3125) and other countries.

Specific questions regarding Medtronic's Global Supplier Standards can be addressed to [responsiblesupplymanagement@medtronic.com](mailto:responsiblesupplymanagement@medtronic.com).