

Global Human Rights and Labor Standards Policy

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Purpose

This policy reflects Medtronic's Mission to contribute to human welfare and to recognize the personal worth of employees. This policy requires our employees to respect internationally recognized human rights consistent with this policy and Medtronic's expectation that suppliers also respect internationally-recognized human rights consistent with this policy. In cases where a national law conflicts with internationally recognized human rights, Medtronic will, while complying with the law, seek to respect the human rights and labor standards that have been established by law and internationally recognized organizations.

Scope

This policy applies to all Medtronic locations, all Medtronic personnel, and any third-party labor agencies providing employees on Medtronic's behalf. Medtronic will strive to ensure that its suppliers adhere to the minimum standards that are outlined within this policy.

Policy Statement (Details)

This policy establishes requirements for global conduct related to human rights and labor standards. This policy is informed by internationally recognized instruments setting forth human rights and labor standards to continue to enhance our respect for human rights and labor standards and to improve the conditions of our operations and to reflect our social responsibility.

Human Rights

Medtronic strives to conduct its business in a manner that demonstrates a respect for internationally recognized human rights and the dignity of all people. This means that Medtronic will operate its business with the following values:

- Diversity and Inclusion
 - Medtronic's Global Inclusion and Equal Employment Opportunity Policy articulates Medtronic's commitment to an inclusive and diverse workforce.
 - All employment decisions, including hiring, pay, and promotions, will be made without regard to gender, sex, sexual orientation, gender identity and/or expression, age, color, national origin, citizenship status, physical or mental disability, race, religion, creed, genetic information, marital status, familial status, status with regard to public assistance, veteran status, or any other characteristic protected by country, federal, state or local law.
- Fair Treatment
 - Medtronic's Global Harassment and Other Forms of Offensive Behavior Policy addresses the rules and guidelines that have been implemented to provide a workplace that is free from harassment and discrimination of any kind.
 - Medtronic prohibits any harassing behavior, as defined below under Prohibited Conduct.

- Freedom from Forced Labor
 - Medtronic's Global Anti-Human Trafficking and Forced Labor Policy articulates Medtronic's commitment to strictly prohibit human trafficking and forced labor.
 - Medtronic will not use or engage in any form of coerced, bonded, indentured, or forced prison labor. All employees will be free to leave or terminate their employment without fear of physical, psychological, sexual, or verbal abuse.
 - Medtronic prohibits the use of slavery and human trafficking in Medtronic facilities and by suppliers in Medtronic's supply chain.
- Free of Child Labor
 - Medtronic does not allow child labor in its operations. The term "child" is defined below in the abbreviations, acronyms, and definition section.
- Fair Compensation
 - Medtronic complies with all applicable minimum wage, overtime, and maximum hour rules that are established by laws and regulations in the operating regions.
- Freedom of Association
 - Medtronic respects the freedom of association. Where our employees wish to be represented by trade unions, we will cooperate in good faith with the bodies that our employees collectively choose to represent them within the appropriate national legal frameworks.

Any Medtronic employee that knowingly engages in any of these prohibited activities, or any management employee who is aware of these activities occurring and fails to report it, is subject to disciplinary action, up to and including termination of employment.

Suspected violations of this policy may be reported to Medtronic Legal or, anonymously, to the Voice Your Concern line. Medtronic prohibits retaliation for reporting suspected violations of this policy.

Medtronic will not tolerate any form of retaliation against an individual who reports, files, testifies, participates in an investigation or agency proceeding or who is a witness to a violation of this policy. Employees who engage in any act of retaliation may be subject to disciplinary action up to and including unpaid suspension and/or termination of employment. There will be no retaliation against any individual who, in good faith and belief, reports such conduct, even if the investigation produces insufficient corroborating evidence or the claims cannot be proven. However, disciplinary action may be taken against individuals who make false, frivolous, reckless or malicious allegations.

Medtronic is committed to complying with all applicable national and local laws, rules, and regulations in the countries in which it operates.

Compliance and Training

This policy will be communicated to all employees and will be available publicly. Medtronic has defined a process as a part of the Responsible Supply Management program to review our external supply chain's labor standards to assess if they are consistent with this policy and will address any violations appropriately. Human Resources Compliance has defined a process to review Medtronic's internal facilities to assess if they are consistent with this policy. Employees are required to complete yearly training on Medtronic's Code of Conduct, which references this policy.

To demonstrate our commitment to compliance, Medtronic annually publishes a public report detailing the work of our Global Human Rights Program.

This policy references various resources including existing Medtronic policies, international labor organizations, and governing bodies; further information is available in the references section below.

This policy is subject to the review schedule and governance that is outlined in the Global Policy on Policies.

Procedures

Roles and Responsibilities

<i>Role</i>	<i>Responsibilities</i>
Employees	<ul style="list-style-type: none"> • Complete yearly Code of Conduct training requirements • Report any violations of this policy to your manager or supervisor, Human Resources representative, or by following the steps on: voiceyourconcernline.com
Human Resources	<ul style="list-style-type: none"> • Assist employees that report any violations of this policy • Support compliance of this policy

Abbreviations, Acronyms, and Definitions

Child- refers to any person under the minimum legal age for employment under applicable law where the work is performed and, as applicable, the type of work being performed.

Prohibited Conduct includes, but is not limited to:

- Any conduct that shows hostility toward an individual because of the individual's sex, gender, sexual orientation, gender identity and/or expression, marital status, race, color, religion, national origin, ancestry, military or veteran status, age, disability (whether physical or mental), medical condition, genetic information, or any other characteristic protected by law.
- Any conduct that is abusive, threatening or bullying, even if such conduct is not based on a legally protected characteristic. Specifically, any malicious conduct that a reasonable person would find hostile, offensive, and unrelated to an employer's legitimate business interests, including the repeated use of derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person's work performance.
- Conduct may be deemed offensive behavior even if it does not meet the legal definition of harassment under state or federal law
- Abusive conduct, defined as malicious behaviors that can include the repeated use of derogatory remarks, insults, and verbal or physical conduct that a reasonable person would consider threatening,

intimidating, or humiliating, as well as the deliberate sabotaging or undermining of a worker's performance of a job.

Appendices

FAQs

References & Related Policies

<i>Reference ID</i>	<i>Title</i>
http://www.medtronic.com/us-en/about/corporate-governance.html	Medtronic Code of Conduct
http://www.medtronic.com/us-en/about/corporate-governance.html	Medtronic Business Conduct Standards
Medtronic Policy Portal: policy.medtronic.com	Global Inclusion and Equal Employment Opportunity Policy
Medtronic Policy Portal: policy.medtronic.com	Global Harassment and Other Forms of Offensive Behavior Policy
Medtronic Policy Portal: policy.medtronic.com	Global Workplace Safety and Security Policy
Medtronic Policy Portal: policy.medtronic.com	Global Policy on Policies
Medtronic Policy Portal: policy.medtronic.com	Global Environmental Health and Safety Policy
Medtronic Policy Portal: policy.medtronic.com	Voice Your Concern Policy
Medtronic Policy Portal: policy.medtronic.com	Global Anti-Human Trafficking and Forced Labor Policy
http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf	United Nations Guiding Principles of Business and Human Rights
http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm	International Labour Organization's Fundamental Conventions

Policy Contacts

<i>Role</i>	<i>Title</i>
Policy Sponsor	Nicole Beech, Vice President Employee and Labor Relations and HR Compliance
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Documentation History

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10/03/2016	1.0	Initial Release
02/01/2020	2.0	Comprehensive Review
05/09/2022	3.0	Comprehensive Review