

# Medtronic

Medtronic Limited  
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## UK Modern Slavery Act Statement

September 2022

The United Kingdom (UK) Modern Slavery Act of 2015 requires certain businesses to provide public disclosures regarding their efforts to eradicate slavery and human trafficking from their supply chains. This statement constitutes Medtronic Limited's disclosure for the 2022 fiscal year, which ended on 30 April 2022.

Medtronic is a global leader in medical technology, services and solutions. It develops and manufactures devices and therapies to treat various health conditions, such as cardiac devices, cranial and spinal robotics, insulin pumps, surgical tools, patient monitoring systems, and more.

Medtronic strives to conduct its activities in a manner that reflects its Mission and Code of Conduct – which includes being a good corporate citizen, dealing fairly in business, behaving ethically, upholding human rights, supporting a safe and healthy workplace, doing business in an environmentally responsible manner, and complying with applicable law. We are committed to ensuring that our supply chain reflects our values and beliefs by conducting business in ways that are consistent with Medtronic's applicable policies and practices.

Employees of Medtronic and its external suppliers are required to adhere to the [Medtronic Code of Conduct](#) and the Supplier Quality & Excellence Manual, respectively. The Manual states the following:

*We aim to be a positive social presence in every community where we work. We promote basic human rights by following applicable local labour laws, and we do not allow child or forced labour by our Company or suppliers. We also follow all applicable wage and hour laws, including minimum wage, overtime and maximum hour rules.*

The Medtronic Group globally is addressing the requirements of the UK Modern Slavery Act by:

- Verifying product suppliers with elevated risk by evaluating and addressing the risks of human trafficking and slavery through the following mechanisms:
  - Adopting the [Global Human Rights and Labor Standards Policy](#) that prohibits the use of slavery and human trafficking in Medtronic and its supplier facilities.
  - Adopting the [Global Anti-Human Trafficking and Forced Labor Policy](#) that reinforces the company's commitment to prohibiting the use of human trafficking, slavery, and forced labour in Medtronic and its supplier facilities.

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- o Publishing the [Global Supplier Standards](#) that set expectations for Medtronic's suppliers' social, environmental and business conduct.
- o Establishing a Supplier Sustainability Assessment program to monitor and verify the compliance of its suppliers with elevated risk with Medtronic standards through desk-top and on-site audits.
- o Identifying geographies and industries where Medtronic operations and suppliers could have elevated modern slavery risks.
- o Mitigating modern slavery risks by executing a [Global Human Rights Program](#) (internally) and Supplier Sustainability Assessment Program (externally, in supply chain). Globally, in FY22, 186 suppliers were assessed on their sustainability performance (including modern slavery) and 6 suppliers were audited on-site and 3 follow-up audits were carried out on workplace conditions and business practices. Suppliers that demonstrated less than acceptable performance levels are asked to implement corrective action plans and improve performance.
- Requiring suppliers to comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business through, for example:
  - o Incorporating social responsibility and environmental criteria in its supplier selection and management processes. The Global Supplier Standards, for instance, have been included in purchase order terms and conditions as well as certain supplier agreements.
  - o Requiring suppliers to adhere to all applicable laws relating to labour, environmental, health/safety and ethics, and by way of example and without limitation, Medtronic's Code of Conduct, Global Human Rights and Labor Standards Policy.
- Maintaining internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking through, for example:
  - o Establishing a [Global Human Rights Program](#) that is aligned with Medtronic's Mission and in response to issues that are material to the company and its key stakeholders. The program addresses human rights and labour standards issues, risks, and performance in Medtronic's global operations.
  - o Establishing the cross-functional Human Rights and Labor Standards Council, which serves as a forum for addressing human rights and labour standards issues, risks and performance in company operations and through certain suppliers.
  - o Requiring all employees to adhere to all applicable laws relating to labour, environmental, health/safety and ethics, and by way of example and without limitation, Medtronic's Code of Conduct, Global Human Rights and Labor Standards Policy.

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- Requiring comprehensive Responsible Supply Management awareness training for employees with direct responsibilities for supplier selection and management. This training includes an overview of potential human rights and labor standards issues, the details of the Global Supplier Standards and supplier compliance requirements, as well as supplier selection and management best practices. In FY21 Medtronic launched a new version of the Responsible Supply Management training in an e-learning system. This training was completed by over 1,000 Medtronic employees globally in supplier selection and management roles. In FY22, more than 300 employees participated in our Responsible Supply Management training and learning program. This brings our total number of employees trained since FY21 to more than 1,300.
- Medtronic maintains a global Voice Your Concern line whereby Medtronic and supplier employees, including any third parties, can report concerns and violations of Medtronic policies on human rights.

This statement applies to all of Medtronic's member companies, including Medtronic Limited, which acquires products from its affiliates and distributes them in the UK.

This statement was approved by the Board of Directors of Medtronic Limited on 16 September 2022.

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Mark Elsey

Financial Director, Medtronic Limited