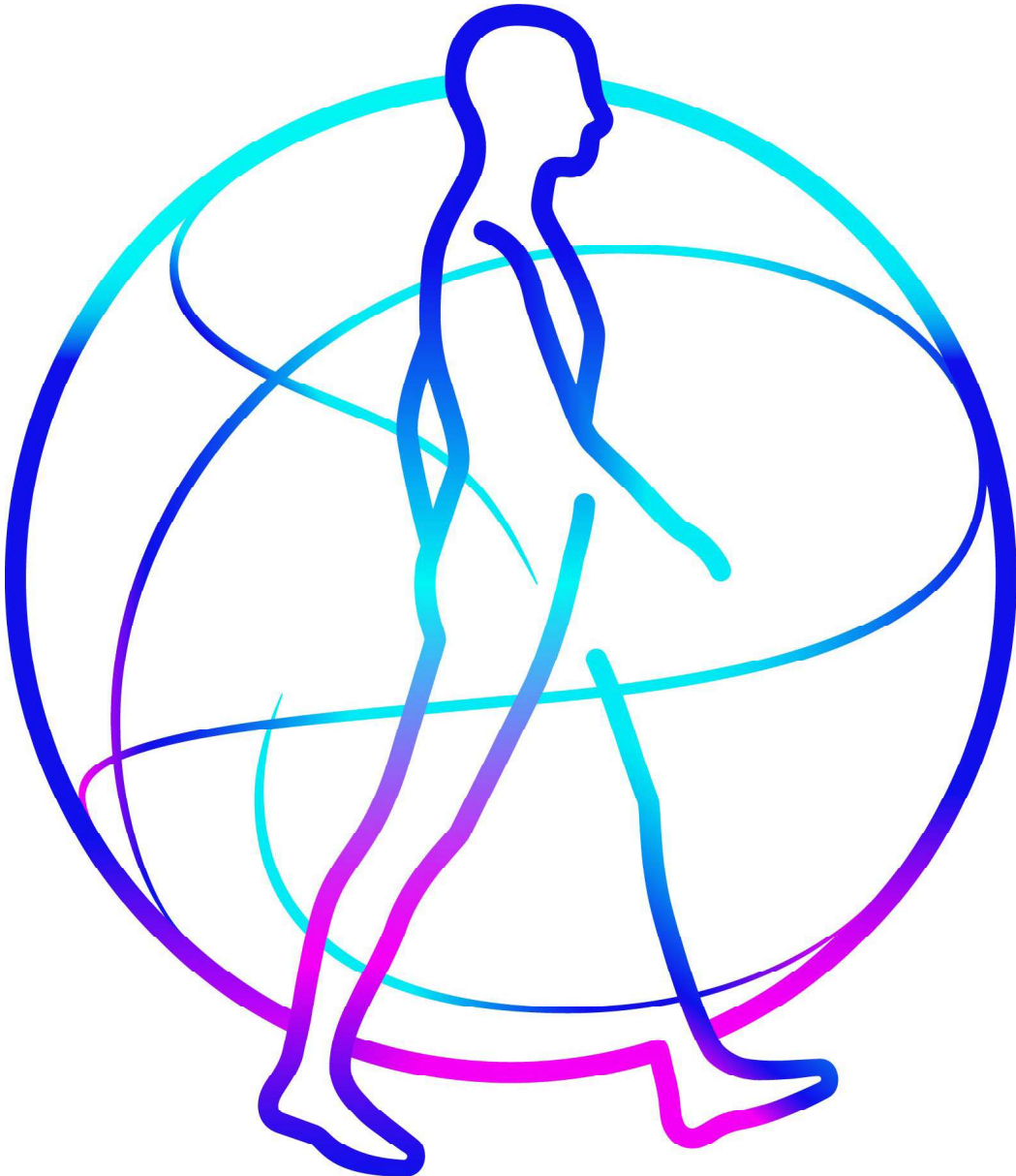


Medtronic



Transparency Act Statement
Fiscal Year 2026

1. Introduction

The Norwegian Transparency Act of 2022 requires companies to provide public disclosures regarding their efforts to address adverse impacts on fundamental human rights and decent working conditions. This statement constitutes Medtronic Nordic's account for due diligence for the 2026 fiscal year which covers the period 26 April 2025 to 24 April 2026, pursuant to section 5 of the Norwegian Transparency Act. It outlines the company's policies and procedures for identifying and managing risks related to human rights and decent working conditions. Furthermore, the report describes the measures we have implemented and plan on implementing in response to our prioritized risk areas, in line with the objectives of the Norwegian Transparency Act.

Medtronic's mission is to contribute to human welfare, to recognize the personal worth of employees and to maintain good citizenship as a company. We strive to conduct our activities in a manner that demonstrates respect for internationally recognized human rights and the dignity of all people. Our commitment to respect human rights is set forth in our Global Human Rights and Labor Standards Policy, which has been in place since 2016.

2. About Medtronic / Company summary

Medtronic plc, headquartered in Dublin, Ireland, is a leading global healthcare technology company. Medtronic was founded in 1949 and today serves healthcare systems, physicians, clinicians, and patients in more than 150 countries worldwide. The company has over 95,000 employees around the world and more than 120 facilities. The company develops technologies and manufactures devices to treat various health conditions, such as cardiac devices, cranial and spinal robotics, insulin pumps¹, surgical tools, patient monitoring systems, and more. Medtronic sells medical devices and therapies through a combination of direct sales representatives and independent distributors globally.

Medtronic's main operational offices are located in Minneapolis, MN, United States, and the administrative headquarters are located in Dublin, Ireland. Medtronic has a global presence, with regional locations across the world. Regional locations consist of manufacturing and research facilities, in addition to commercial locations (sales, administration and other support functions).

About Medtronic's operations in Norway

Medtronic has one location in Oslo, Norway. The legal entity is set up as a Limited Risk Distributor – commercial organization, selling MedTech equipment to the Norwegian market. The Nordic division ('Medtronic Norge AS'), primarily engages in sales activities and engages in public tenders for hospitals and municipalities in Norway.

The Norwegian Medtronic organization is part of a Nordic Cluster. This cluster consists of Norway, Denmark, Iceland, Sweden & Finland. There is strong cross-border and cross-business cooperation. This set-up provides us with the opportunity for knowledge sharing and the option of rendering the company's internal administrative processes more efficient. The support functions of the Nordic countries have since 2013 been placed at the Copenhagen office – Nordic HUB. This has strengthened opportunities to work closely together and share knowledge and experiences among the functions.

All above is with the sole objective of providing for the needs of patients, customers, and society on a high professional level.

The subgroup includes Medtronic Norge AS and the wholly owned subsidiaries Medtronic AB and Medtronic Danmark A/S. Medtronic Norge AS is wholly owned directly by the parent company Medtronic Holding BV which in turn is 100% indirectly owned by Medtronic plc. The subgroup is included in the Medtronic plc financials.

Medtronic ('Medtronic Norge AS') has been present in Norway since 1975. Between 1986 and 1995, its products were distributed by Vingmed AS. Medtronic Vingmed AS was then founded as a subsidiary of Medtronic Inc in 1995. In 2006, the company changed its name to Medtronic Norge AS.

¹ Medtronic's diabetes business (including insulin pump activities) was part of the company for the majority of FY2026. The business was separated into an independent entity in early March 2026. References in this report therefore reflect the structure and operations during the relevant reporting period.

Medtronic Norge AS info:

- *Medtronic's Global Human Rights Policy and Code of Conduct are approved by the Norwegian board*
- *47 Employees are employed in the Norwegian organization*
- *Commercial activities on behalf of Medtronic Norge AS are conducted in the Norwegian office*
- *The Norwegian market is a public tender market. Norwegian hospitals – Norwegian Regions are purchasing the tendered MedTech products in order to fulfill the Norwegian Healthcare requirements*

Markets of operations / our supply chain

The majority of Medtronic's procurement activities are directly linked to purchasing material and components to produce medical devices. We procure materials and services from approximately 61,000 suppliers across 120 countries. Suppliers manufacture and assemble components and equipment at their own sites. In addition, a proportion of our products are manufactured by contract manufacturers globally. As such, our products are manufactured at facilities located in various countries across the world.

3. Medtronic's approach to human rights management

Policy commitment, policies and procedures

Medtronic strives to conduct its business in a manner that demonstrates our respect for internationally recognized human rights and the dignity of all people. Our Global Human Rights Framework, Global Human Rights and Labor Standards Policy, Global Anti-Human Trafficking and Forced Labor Policy, Code of Conduct and Global Supplier Code of Conduct outline the foundation for Medtronic's expectations for ethical and sustainable business conduct.

Our overall commitment and approach to human rights is embedded in our governing documents. [The Global Human Rights and Labor Standards Policy](#) and [Global Anti-human Trafficking and Forced Labor Policy](#) set forth Medtronic's commitment to respect internationally recognized human rights throughout its supply chain. The Human Rights and Labor Standards Policy statement guides the company's human rights work and includes principles on:

- Diversity and inclusion
- Fair treatment
- Freedom from forced labor
- Free of child labor
- Fair compensation
- Freedom of association

For more information on our policy commitment, see Medtronic's policies (hyperlinked above).

In addition, Medtronic has numerous other global policies in place to support the implementation of the company's commitments, - including:

- Global Inclusion and Equal Employment Opportunity Policy
- Global Harassment and Other Forms of Offensive Behavior Policy
- Global Workplace Safety and Security Policy
- Global Environmental Health and Safety (EHS) Policy
- Voice Your Concern Policy

Medtronic is 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, including adherence to principles of responsible sourcing of materials for our products. As part of our commitment to responsible sourcing and human welfare, Medtronic's [Global Supplier Code of Conduct](#) and a Supplier Quality Excellence Manual set clear requirements for ethical conduct, respect for human rights, and fair working conditions, including prohibitions on forced and child labor. These requirements are supported by risk-based supplier due diligence and responsible sourcing practices, including compliance with [Medtronic's Responsible Minerals Policy](#), which commits to compliance with the United States requirements known as the Dodd-Frank Act.

Grievance mechanism

Medtronic has an anonymous, independently operated hotline (Voice Your Concern) to support the Global Human Rights Framework, whereby Medtronic employees and suppliers, including other third parties, can report concerns and violations of Medtronic policies on human rights. In the event that a human rights complaint is received through this reporting line, the claim is investigated and substantiated through an internal analysis of the facility in question, including a re-evaluation of the overall facility risk score and implementation of additional operational controls (as required). [The Voice Your Concern](#) reporting line is available to all Medtronic employees, contract staff, suppliers, and the public. Medtronic has a chief counsel for global compliance investigations responsible for supporting internal processes around alleged misconduct.

4. Governance of respect for human rights and our approach

Governance structure

Medtronic has a company-wide global approach to human rights due diligence processes which is integrated into our governance structure. Our shared ownership structure reflects the horizontal nature of the company's human rights processes and the size and complexity of the organization. At the time of reporting, the responsibility for Medtronic's due diligence activities is shared between Enterprise Risk Management, Human Resources, and Global Supply Management – with support from Trade Compliance and Legal.

The Human Resources department holds the responsibility for the Global Human Rights program related to internal facilities, and the Global Supply Management team oversees the company's Responsible Supplier Management Program. Medtronic's Enterprise Risk Management function, in partnership with Human Resources, has responsibility to ensure program consistency across the company's human rights due diligence activities.

Given evolving regulatory and stakeholder expectations, Medtronic continues to strengthen the governance, transparency, and effectiveness of its human rights due diligence processes, including across supplier relationships.

Further details on how Medtronic's business is organized can be found in Medtronic's [Impact Report](#).

Medtronic's approach to identify and manage human rights

Medtronic's Global Human Rights Framework and approach has been established to identify and prioritize the most significant human rights risks across our business operations. The approach integrates human rights due diligence and risk assessment processes across internal facilities and our supply chain and is guided by the United Nations Guiding Principles (UNGPs) and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Our approach to human rights due diligence

Due diligence related to internal facilities

Medtronic conducts annual risk assessments of our internal operations facilities, and assessments of our commercial facilities every third year. Facilities are assessed for human rights risks including child labor, fair treatment, forced labor, freedom of association, health and safety, and remuneration. The program has identified certain groups particularly vulnerable to human rights abuses, including children, foreign and domestic migrant workers, poorly educated, local communities, women, indigenous people, and ethnic minorities, which varies based on location. The assessment process is based on various factors such as the type of work performed at the internal facility, as well as the country specific risk factors related to the location of the facility, including country laws, enforcement of laws, and other factors. Based on the information gathered during the assessment, the facility is given a risk score that provides the basis for monitoring and the need for additional operational control to reduce or mitigate potential risk.

Medtronic annually publishes a public report detailing the human rights due diligence work related to internal facilities. As such, more information about the process, can be found in the [Global Human Rights Program Report](#). At this time of reporting, our due diligence activities conducted at our internal facilities during the reporting period have not uncovered any actual adverse effects on human rights or working conditions.

Moreover, Medtronic has an established approach related to ensuring the health and safety of people, promoting diversity and inclusion, and preventing discrimination and harassment. These risks and impacts are routinely managed through our internal

processes and procedures. Our disclosure on handling of these risks and other risks relevant to our internal workforce are covered separately and elaborated on in Medtronic's Impact Report.

Human rights due diligence across our supply chain

Medtronic has adopted a risk-based approach to identify, assess and manage risk of adverse human rights impacts related to its supply chain activities. The due diligence process is integrated in the Responsible Supply Management Program, covering supplier selection and supplier performance management. It includes both a 'Supplier Sustainability Assessment Program' and a 'Conflict Minerals Program'.

Supplier Sustainability Assessment Program

The Supplier Sustainability Assessment Program monitors suppliers' compliance and performance against Medtronic's standards. Using self-assessment surveys and on-site audits, we determine supplier risk in four areas: labor and human rights, environment, ethics, and sustainable procurement. Our risk determination dictates the frequency of a supplier's self-assessment. Low-risk suppliers complete assessments every three years, while medium and high-risk suppliers complete assessments every two years and annually, respectively. We issue corrective action requests to all suppliers identified as medium or high-risk, and we expect them to promptly address high-priority incidents of non-compliance. We also conduct on-site workplace conditions audits of high-risk suppliers.

Responsible Minerals Program

Some of our products contain tin, tungsten, tantalum, or gold. In the Democratic Republic of Congo and neighboring countries, mining and processing of these metals has been linked to funding armed conflict. To promote the use of responsibly sourced minerals, we continue to:

- Support the U.S. Dodd-Frank Act, which requires companies to disclose the use of any such conflict minerals
- Require suppliers to comply with the law and uphold responsible sourcing practices
- Reference conflict minerals in supplier agreements and purchase orders
- Participate as a member of the Responsible Minerals Initiative (RMI)
- Follow the Organization for Economic Cooperation and Development (OECD) guidance on conflict minerals – including surveying suppliers to collect data on smelters in their supply chains

We report our supplier survey results to the U.S. Securities and Exchange Commission annually in a dedicated Conflict Minerals Report. More information on our approach is available in our [Responsible Minerals Policy](#).

5. Due diligence findings

This section provides information on Medtronic's actual and potential adverse impacts on human rights and decent working conditions. No actual major adverse impacts that were identified in FY26 through MDT's due diligence process related to our supply chain activities, but we acknowledge potential risks that require ongoing monitoring and efforts.

Figure 1: Responsible supply management from the bottom up



Potential risks identified in the supply chain for medical devices

The company's global supply footprint, and complex supply chain, involves exposure to potential human rights risks across the global medical device supply environment. Medtronic is aware that industry-specific sustainability risks have been identified in lower tiers of the medical device supply chain, due to the number of suppliers and the origin of production, use of sub-suppliers, and the nature of operations. These risks may include, for example, risks related to labor rights such as forced labor, excessive working hours, and inadequate health and safety conditions at supplier sites, as well as risks linked to the sourcing of raw materials, including conflict minerals.² Medtronic annually screens its tier 1 suppliers for potential risks and prioritizes them for assessments and audits. These potential risks of adverse impacts on human rights and decent working conditions in the supply chain require ongoing efforts. As such, Medtronic continuously works to reduce potential risks of negative impacts by strengthening our due diligence processes and operating mechanisms to ensure human rights risks are effectively identified and mitigated. These identified potential risks form the basis for Medtronic's due diligence activities and risk mitigation measures described in the sections below.

Findings from Medtronic's due diligence activities relating to conflict minerals

Medtronic has designed its conflict minerals program and due diligence measures to be in conformity with the internationally recognized due diligence framework as set forth in the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD, 2013) and related supplements for gold, tin, tantalum and tungsten – necessary minerals for the functionality of our products.

In 2025, Medtronic conducted a reasonable country of origin inquiry (RCOI) to determine whether the company had reason to believe that any of the conflict minerals necessary to the functionality or production of its products may have originated in the Covered Countries. Medtronic identified suppliers to survey by reviewing 2025 direct material purchases and applying applicability filters to segment suppliers that supply Medtronic with products or components that may contain necessary conflict minerals.

For further detail on the results of Medtronic's conflict minerals program and due diligence measures, please refer to Medtronic's most recent Securities and Exchange Commission filing [at the following location](#).

6. Measures implemented and plans going forward

The measures described below are designed to address the key risks identified through Medtronic's due diligence processes and to reduce the likelihood and severity of potential adverse impacts. This section includes information on Medtronic's work to address actual and potential adverse impacts identified through due diligence and risk mitigation efforts.

Measures relevant to own facilities on human rights: internal risk assessments and monitoring of internal facilities

At the time of reporting, all Medtronic manufacturing facilities were assessed in FY26. All assessed facilities, regardless of risk score, receive operational controls. Operational Controls may include new policy development, existing policy updates, training and awareness regarding human rights, and scheduling of an on-site audit. When needed, additional operational controls are put in place based on identified risk from the internal assessments of internal facilities. An Overall Ranking of High will result in escalation to the Emergency Review Board and involves requests to rectify / mitigate the issue(s) within a given timeframe. Whereas an overall ranking of medium will require the development of a remediation plan specifying facility correction actions that are monitored and verified to ensure the issues are resolved on time. The operational controls to reduce or mitigate risk are monitored to ensure their implementation and that they are having the desired positive impact.

For further information on the company's handling of potential risks of adverse impacts relating to our own facilities, see our [Global Human Rights Program Report](#).

² Such as the [risk assessment report by Swedwatch \(2017\)](#) on behalf of The Norwegian Agency for Public and Financial Management (DFØ), which provides information on potential adverse impacts on labour rights and human rights in the supply chains of medical devices and a [sustainability risk assessment](#) published by the Swedish Regional Office for Sustainable Procurement in 2025.

Measures to identify and mitigate risk of adverse impacts in our supply chain

Medtronic strongly opposes substandard working conditions related to company sourcing practices and has several processes and measures in place to ensure any potential risks of human rights violations are identified and mitigated. When any risk of adverse impacts linked to Medtronic's sourcing practices is discovered, the company acts to mitigate and rectify any findings proportionate to the severity and scale of the potential negative impact. In addition to providing mitigation and remediation where needed, the intended outcome of this measure is to reduce the likelihood of future risks.

Setting standards by incorporating supplier requirements

Medtronic has several means in place to convey its expectations to third parties on its commitment to respect human rights. Medtronic requires suppliers to adhere to all applicable laws relating to labor, environmental, health / safety and ethics. All suppliers are expected to comply with our Global Supplier Code of Conduct and promote the same set of standards in their own supply chain. Further, efforts to ensure responsible sourcing are supported by including social and sustainability requirements in purchase order terms and conditions as well as certain supplier agreements. By embedding these requirements into supplier agreements and purchase orders, Medtronic aims to establish a clear baseline of expected conduct across its supplier base and to prevent adverse impacts on human rights and decent working conditions.

Supplier risk assessments, audits and requests for corrective action

As detailed in Section 4, Medtronic has a Human Rights framework in place that includes human rights due diligence and risk assessment processes across our supply chain. The Global Supply Management team conducts risk assessments and on-site audits where relevant. Where areas of risk and / or non-compliance are identified, corrective action requests are issued to suppliers identified as a medium or high-risk, and they are expected to promptly address high-priority incidents of non-compliance. Through these risk assessments and corrective action requests, Medtronic aims to ensure that identified instances of non-compliance are effectively remediated, and seeks to drive continuous improvement in supplier adherence to human rights and labor standards.

Sustainability risk score

Medtronic has partnered with EcoVadis to support supply chain risk assessments and improve sustainability impacts, including human rights. In FY26, Medtronic assessed 524 suppliers on their sustainability performance. These assessments enable Medtronic to identify sustainability risks and prioritize engagement with suppliers where improvements are needed.

Supplier audits

Medtronic works with a third party to conduct on-site audits of suppliers that receive a high-risk score from the supplier sustainability assessment. At this point of reporting, on-site audits of two suppliers and one follow-up audit have been conducted in FY26. The scope of these audits included labor, wages and working hours, health and safety, and business practices. These audits are intended to verify supplier compliance and identify potential adverse impacts that may not be captured through self-assessments alone, with suppliers expected to implement corrective actions where relevant findings are identified.

Strengthening efforts to identify and mitigate supply chain risks

Due to the limited transparency and traceability in global supply chain data, Medtronic recognizes the potential risks associated with adverse impacts in our supply chain. In response, the company is continuously developing and improving its processes to identify supply chain risks. These efforts are expected to improve supply chain traceability and enable Medtronic to identify and address potential adverse impacts at deeper tiers of the supply chain more effectively.

Risk mitigation related to conflict minerals

Medtronic has taken steps to mitigate risks in response to concerns raised by authoritative sources² regarding the supply chain of medical devices, particularly in relation to conflict minerals. Actions include increasing and requesting traceability throughout the supply chain, seeking contractual safeguards and engaging with industry initiatives.

The complexity of the company's supply chain involves limited influence over the behavior of the smelters and refiners with whom Medtronic does not have a direct business relationship. Moreover, due to the geographic diversity and ongoing changes in our supply chain, Medtronic often has significant difficulty identifying those suppliers who are further upstream from our direct suppliers. Despite this, Medtronic continues our efforts to promote the use of responsibly sourced minerals – including referencing conflict minerals in supplier agreements and purchase orders, and requesting suppliers to eliminate red-flag smelters from their supply chain.

Addressing the systemic challenges related to the industry's use of conflict minerals requires a collective effort from industry peers and partners. As such, Medtronic has become a member of the Responsible Minerals Initiative (RMI), which allows the company to play a role in shaping industry policies, engage with stakeholder groups, and provides access to validated data on facilities related to conflict minerals.

For more details on the due diligence activities undertaken as part of the Conflict Minerals Program, refer to Medtronic's Responsible Minerals policy and 'Conflict Minerals Disclosures Report' publicly available through the Company's website: Medtronic.com (Under the "Our company" caption and "SEC filings" sub caption).

Other initiatives

Building awareness among supply chain management personnel

To strengthen employees' risk awareness and ensure adequate competence to carry out due diligence activities, Medtronic provides Responsible Supply Management training for employees in our procurement, sourcing, and supplier quality groups. Employees with direct responsibilities for supplier selection and management are required to complete the Responsible Supply Management awareness training, with training completion metrics formally monitored. The training includes an overview of potential human rights and labor standards issues, the details of the Global Supplier Standards and supplier compliance requirements, and supplier selection and management best practices. Employees working in supply management are trained on awareness of issues that may cause adverse impacts on human rights and labor standards, such as how their decisions can potentially impact factory working conditions. Through these measures, Medtronic aims to enhance the ability of relevant personnel to identify, prevent and respond to potential adverse impacts on human rights and decent working conditions. In FY26, 695 employees in Global Supply Management and Supplier Quality organizations were trained in Responsible Supply Management.

Engaging in partnerships and collaborations

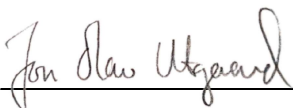
Due to the systemic nature of some of the challenges that impact our supply chain, Medtronic recognizes that achieving desired outcomes requires continuous monitoring, evaluation and engagement with stakeholders and industry peers. Medtronic is actively pursuing opportunities for building and using collective knowledge with industry peers through collaborations and initiatives, and is also pursuing partnerships with non-profit and for-profit organizations to inform, implement, and ensure the constant evolution of our Human Rights Framework. Through these efforts, Medtronic aims to strengthen its ability to address systemic human rights risks and contribute to the development of shared industry standards and responsible supply chain practices.

7. Handling of information requests

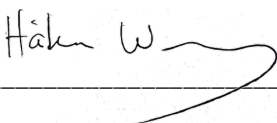
Medtronic Norge AS has established an internal mechanism and procedure for receiving and handling requests for information, pursuant to section 6 of the Norwegian Transparency Act. We have established a dedicated email address rs.transparencyactnorway@medtronic.com linked on our website to ensure requests are handled in a timely manner.



Birgitte Broe, Senior Finance Manager Nordic and Member of the Board of Medtronic Norge AS



Jon Olav Utgaard, Member of the Board of Medtronic Norge AS



Haakon Wennberg, Member of the Board of Medtronic Norge AS