

# Medtronic

Medtronic Limited  
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## UK Modern Slavery Act Statement

September 2025

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 2025 fiscal year, which ended on 25 April 2025.

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:
  - Implementing a [Global Human Rights Framework](#), and supporting due diligence processes, to identify and prioritize our most significant and salient human rights risks.
  - 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.
  - Publishing the [Global Supplier Code of Conduct](#) that set expectations for Medtronic's suppliers' social, environmental and business conduct.
- Mitigating modern slavery risks across our direct suppliers (e.g., tier 1 suppliers of raw materials and finished goods), sub-tier suppliers that supply materials to our direct suppliers, indirect suppliers (e.g., suppliers that provide us with services rather than materials or finished goods), and Medtronic owned and managed facilities through our due diligence processes, including:
  - Identifying geographies, industries, and products where Medtronic operations and suppliers could have elevated modern slavery risks.
  - Maintaining, a Supplier Sustainability Assessment program to monitor and verify the compliance of

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its suppliers with elevated risk with Medtronic standards through desktop and on-site audits.

- Using our Supplier Risk Mapping tool, considering industry and geographic region as well as the amount we spend with each supplier, to create a priority list of facilities that should undergo third-party assessments and audits.
- In addition, to support our established Supplier Risk Mapping tool, Medtronic partnered with a leading supply chain mapping provider to aggregate multiple data streams across our complex supply chain — for the product lifecycle — to assist with the identification and mitigation of supply risks across our Tier 1 and sub-tier suppliers. This platform provides Medtronic with additional risk data — informing our due diligence processes and the prioritization of our suppliers based on risk. It also integrates ongoing monitoring with real-time updates from global human rights and forced labor watch lists.
- Leveraging these risk assessment and due diligence processes, globally in FY25
  - All Tier I suppliers were assigned inherent risk scores using our Supplier Risk Mapping tool and supporting supply chain mapping data.
  - 6 suppliers were audited on-site (with support from a third-party audit provider) and 5 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:
  - Incorporating social responsibility and environmental criteria in its supplier selection and management processes. The Global Supplier Code of Conduct, for instance, has been included in purchase order terms and conditions as well as certain supplier agreements.
  - 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:
  - Maintaining the Global Human Rights Framework, and supporting policies outlined above, aligned with Medtronic's Mission and in response to issues that are material to the company and its key stakeholders. The Framework addresses human rights and labour standards issues, risks, and performance in Medtronic's global operations.
  - Establishing the cross-functional Human Rights Supplier Issue Panel, which serves as a forum for addressing human rights and labour standards issues, risks and performance in company operations and through certain suppliers.
  - 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.
- 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 labour standards issues, the details of the Global Supplier Code of Conduct and supplier compliance

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requirements, as well as supplier selection and management best practices.

- Maintaining Medtronic's global anonymous Voice Your Concern hotline that supports our Global Human Rights Framework. The Voice Your Concern reporting line is available to all Medtronic employees, contract staff, suppliers, and the public.

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 14 August 2025.

Signed by:  
  
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Burcu Alkis  
Financial Director, Medtronic Limited