

Global Anti-Human Trafficking and Forced Labor

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Purpose

Medtronic's Global Human Rights and Labor Standards Policy outlines Medtronic's commitment to a work environment that is free from human trafficking, slavery, unlawful child labor, and forced labor of any kind. The purpose of this policy is to reinforce that commitment so that everyone who works at or with Medtronic is treated with dignity and respect, reflecting Medtronic's Mission to contribute to human welfare and to recognize the personal worth of employees.

Scope

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

Policy Statement (Details)

Medtronic strictly prohibits human trafficking and forced labor. Human trafficking and forced labor are serious violations of fundamental human rights, labor rights, and a violation of law and international labor standards.

Human trafficking and forced labor can happen to people of any race, age, gender, or nationality in all types of businesses and industries in any country in the world. Everyone subject to this policy must understand the warning signs of human trafficking and/or forced labor.

This policy strictly prohibits:

- **Misleading or fraudulent recruitment practices including recruitment fees** - Applicants will not pay any amount of money or fees during any phase of the recruitment process to secure a job with Medtronic. Entities who contract with Medtronic may not charge their clients to work at Medtronic.
- **Withholding identity or immigration documents** - Applicant's or worker's passports, residency or work permits, or other personal documents, will not be withheld for any reason unless required by law. In the event that personal documents are held by the employer due to legal requirements, they must be returned immediately upon the employee's demand without preconditions.
- **Harsh or inhumane treatment** - Medtronic does not tolerate the use of intimidation and violence in the workplace to coerce persons to do work.
- **Unfair or illegal deductions from wages** - Wages must be specified in writing and must meet legal minimum wage requirements in the country of employment and paid in full transparency. Wages cannot be deferred or withheld to bind workers to employment; deductions cannot be made to recoup recruiting costs.
- **Restriction on freedom of movement** - Reasonable freedom of movement within work and living environments must be provided. Migrant workers are free to return to their home country during paid leave without threat of termination.

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.

Due Diligence Process

Medtronic has established a cross functional team that includes Human Resources, Responsible Supply Management, Environmental Health and Safety and Sustainability, Legal, and representatives from each business unit. This team monitors internal and external compliance with this policy by surveying and collecting data from internal facilities, contract manufacturers, and suppliers.

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

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.

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

Forced labor- all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

Human Trafficking-is also called modern slavery and involves the use of force, fraud, or coercion to obtain some type of labor.

Third-party labor agencies- any agency or vendor that provides temporary or permanent labor to Medtronic.

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 Human Rights and Labor Standards Policy

Policy Contacts

<i>Role</i>	<i>Title</i>
Policy Sponsor	Nicole Beech, Vice President Employee and Labor Relations and HR Compliance
Policy Owner	Nordeen Gangani, Sr. HR Director
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