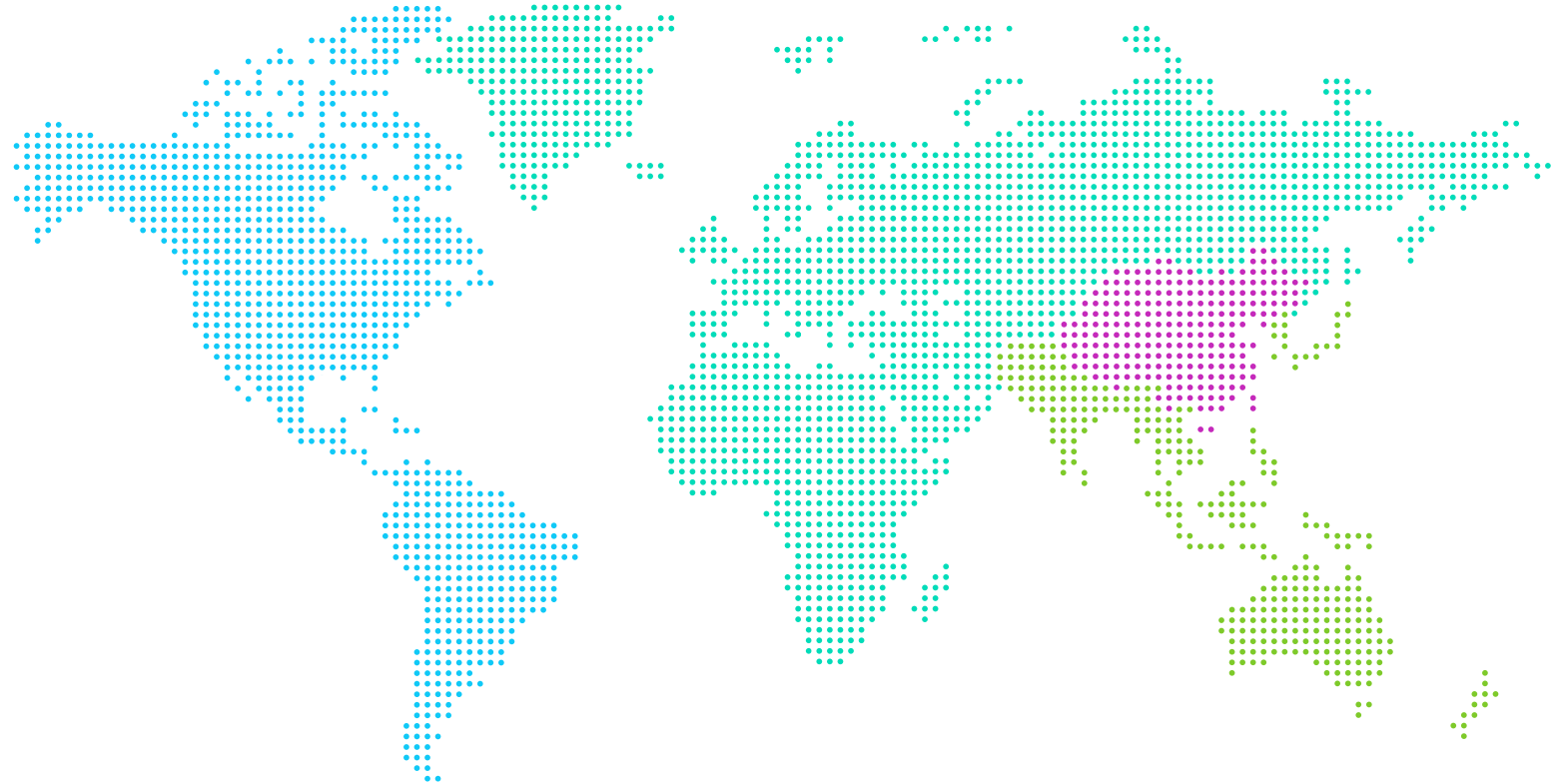


# FY24 Global Human Rights Report

## Global Human Rights

As outlined in our Global Human Rights and Labor Standards Policy, Medtronic strives to conduct its business in a manner that demonstrates a respect for internationally-recognized human rights and the dignity of all people.



# Why this program is in place

## Program Responsibility

Within Human Resources, Medtronic has established a Global Human Rights Program. This program is responsible for:

- Establishing and communicating human rights policies
- Assessing Risk - Identify and prioritize internal facilities based on risk. Assess risk based on: type of work performed, country laws, enforcement of laws, and other factors. Conduct audits of internal facilities.
- Monitoring - Develop operational controls. Monitor effectiveness of operational controls.
- Reporting - Share results with appropriate leadership. Support customer/social audits

## Internal Assessments

Medtronic's Global Human Rights Program conducts annual assessments of its internal operations facilities, and tri-ennial assessments of its commercial facilities. In addition to our annual and tri-ennial assessments, new business via M&A activities are also assessed when identified/integrated.

These facilities are assessed for various human rights issues including the following: child labor, discrimination, fair treatment, forced labor, freedom of association/right to collective bargaining, harassment, health and safety, human trafficking, involuntary labor, 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). This internal assessment is the first step in the Global Human Rights Program Lifecycle (Lifecycle is detailed on page 4).

Facilities are assessed with a focus on the internal facility itself, as well as the country in which the facility is located. Based on the information gathered during the assessment of the facility and the country, the facility is given a risk score.

# Risk Overview & Assessments

## FY24 Manufacturing Risk Scores

**Low**- 36 sites

**Medium**- 29 sites

**High**- 0 sites

## Risk Score Explanation

The singular risk score takes into account the known human rights and labor standards information that is documented regarding the country in which the facility is located, as well as an assessment of the internal facility operations.



### FY23 Snapshot

285 facilities assessed

Manufacturing breakdown:

65 facilities assessed.

55% low, 45% medium, 0% high

Commercial breakdown:

220 facilities assessed.

68% low, 32% medium, 0% high

### FY24 Snapshot

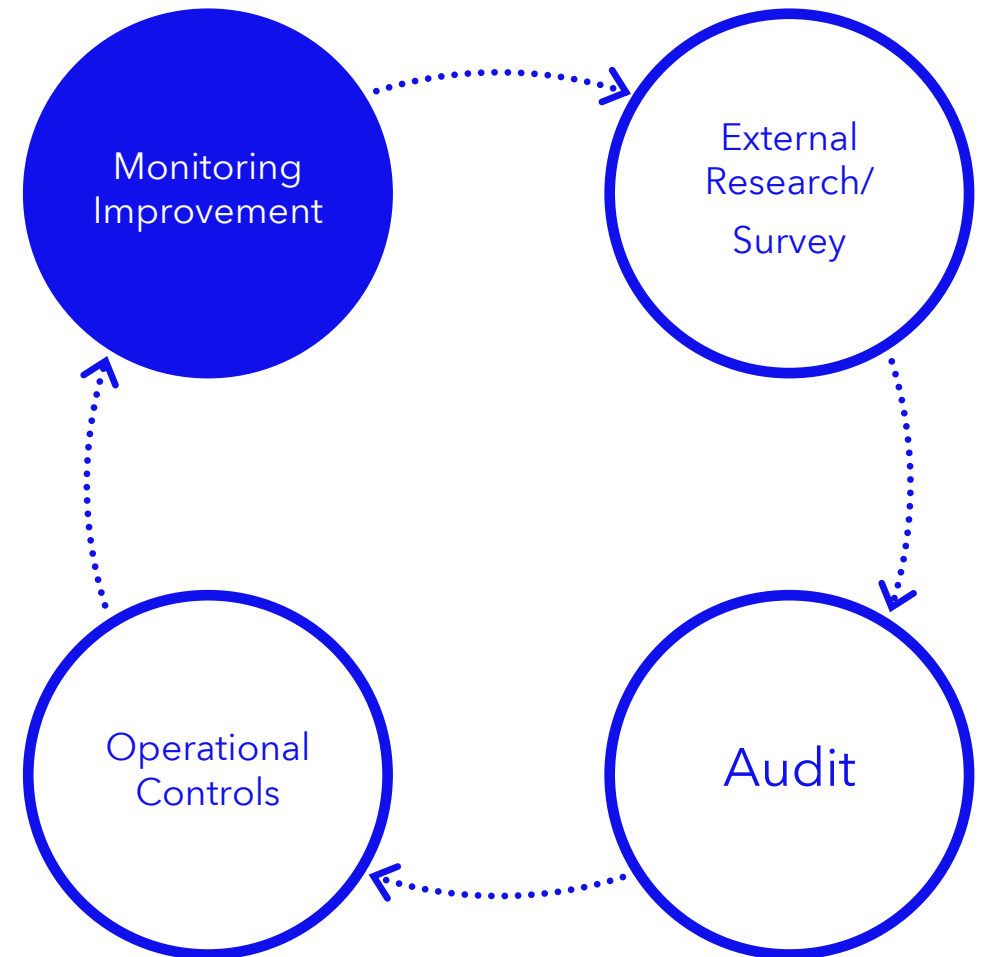
Manufacturing breakdown: 62 facilities assessed.

58% low, 42% medium, 0% high

# Global Human Rights Lifecycle

**Global Human Rights Program Lifecycle-** is the strategy used by the Global Human Rights Program to assess our facilities. Each stage in the lifecycle corresponds to a different quarter within Medtronic's fiscal year. This process is repeated on an annual basis for operations facilities and every three years for commercial facilities.

- **External Research/Survey:** Research consists of an analysis of the laws and enforcement of those laws for the country a facility is located in. The survey is an assessment of potential risks of the internal facility, conducted with HR leadership for the site.
- **Audit:** Process by which information gathered during the external research and survey is assessed to determine the overall risk score of a facility. A minimum age/wage audit is also conducted at this time. A facility can be labeled as Low, Medium, or High risk.
- **Operational Controls:** All sites will be assigned operational controls. Based on a facility's risk score, specific operational controls will be put in place to reduce/mitigate potential risks. Examples include new policy development, training, and scheduling of an onsite audit.
- **Monitoring Improvement:** The operational controls that were put in place will be reviewed to make sure they are being fully implemented and are having the desired impact.



# Global Human Rights Program Process Flow

1. Facilities in scope for assessment are determined
2. Site leads/contacts for each site are identified
3. A recap of the program and a link to the survey are sent to the site leads/contacts
4. Go through completed surveys and score each question according to scoring key
5. Total the individual questions scores to establish total internal risk score
6. Conduct external research utilizing the Everstream data for the country in which the facility operates
7. Assign a total external risk score to each location
8. Pull a report of the number of employees per facility. Adjust internal risk scores to reflect increased risk due to higher number of employees.
9. An average is taken of the adjusted internal risk score and the external risk score to determine the overall risk score for the facility
  1. An overall ranking of High will result in escalation to the Emergency Review Board:
    1. Site lead and HR Ops leader are contacted with the request to mitigate the issue(s) within a given time (to be determined for each situation)
      1. If facility satisfies the requirement, they will be upgraded to Medium risk and surveyed again in 1 year
      2. If facility fails to rectify the issue, the HR Emergency Review Board will be notified, and necessary actions will be taken
10. The operational controls that are put in place to reduce or mitigate risks are monitored to ensure their implementation and that they are having the desired positive impact
11. At the end of the cycle the results for the FY are archived and the process is repeated.
12. If a Human Rights complaint is received through the Voice Your Concern line and the claim is substantiated, the internal analysis for the facility will be reevaluated and a new risk score will be assigned

**HR Emergency Review Board:** Consists of the VP of Global HR Services & Employee Relations, Senior Director of HR Compliance, HR Compliance Program Manager, HR Compliance Program Specialist, and the VP HR Operations (Impacted OU or Region)

# Global Human Rights and Labor Standards Policy

**Version 3.0**  
**Effective Date 05/09/2022**

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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

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

### 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

<b>Reference ID</b>	<b>Title</b>
<a href="http://www.medtronic.com/us-en/about/corporate-governance.html">http://www.medtronic.com/us-en/about/corporate-governance.html</a>	Medtronic Code of Conduct
<a href="http://www.medtronic.com/us-en/about/corporate-governance.html">http://www.medtronic.com/us-en/about/corporate-governance.html</a>	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
<a href="http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf">http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf</a>	United Nations Guiding Principles of Business and Human Rights

<a href="http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm">http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm</a>	International Labour Organization's Fundamental Conventions
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### Policy Contacts

<b>Role</b>	<b>Title</b>
Policy Sponsor	Nicole Beech, Vice President Employee and Labor Relations and HR Compliance
Policy Owner	Kasey Keiser, Sr. Director HR Compliance
Policy Contact	Rs.hrcompliance@medtronic.com

### Documentation History

<b>Date</b>	<b>Revision</b>	<b>Description</b>
10/03/2016	1.0	Initial Release
02/01/2020	2.0	Comprehensive Review
05/09/2022	3.0	Comprehensive Review

## Global Anti-Human Trafficking and Forced Labor

**Version 1.2**  
**Effective Date 05/09/2022**

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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

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

### 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

<b>Reference ID</b>	<b>Title</b>
<a href="http://www.medtronic.com/us-en/about/corporate-governance.html">http://www.medtronic.com/us-en/about/corporate-governance.html</a>	Medtronic Code of Conduct
<a href="http://www.medtronic.com/us-en/about/corporate-governance.html">http://www.medtronic.com/us-en/about/corporate-governance.html</a>	Medtronic Business Conduct Standards
Medtronic Policy Portal: policy.medtronic.com	Global Human Rights and Labor Standards Policy

### Policy Contacts

<b>Role</b>	<b>Title</b>
Policy Sponsor	Nicole Beech, Vice President Employee and Labor Relations and HR Compliance
Policy Owner	Kasey Keiser, Sr. Director HR Compliance
Policy Contact	<a href="mailto:Rs.hrcompliance@medtronic.com">Rs.hrcompliance@medtronic.com</a>

### Documentation History

<b>Date</b>	<b>Revision</b>	<b>Description</b>
03/01/2018	1.0	Initial Release
02/01/2020	1.1	Review
05/09/2022	1.2	Review

# Global Inclusion and Equal Employment Opportunity

**Version 1.2**  
**Effective Date 01/27/2022**

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## **Purpose**

The purpose of this policy is to articulate for all employees the expectations of Medtronic to foster an inclusive environment and to weave diversity and individual respect into the fabric of everything we do. We believe that creation of an inclusive environment will contribute to a positive platform for innovation.

## **Scope**

This policy applies to all Medtronic employees and all agents that act on behalf of Medtronic.

## **Policy Statement (Details)**

Equal opportunity and fair treatment is expected to be applied to all employees in all employment decisions and Medtronic prohibits any form of discrimination prohibited by our policies and the laws of the countries in which we do business. Specifically, it is the policy of Medtronic to provide equal employment opportunity (EEO) to all persons. This means that 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; and ensure that all employment decisions are based only on valid job requirements. In addition, Medtronic will comply with all civil rights, human rights, environmental and labor laws in the countries in which we operate. This means that we will act in a socially responsible way, prohibit child labor and provide clean and safe work environments for all employees globally. In addition, Medtronic will provide reasonable accommodations for qualified individuals with disabilities.

Medtronic employees are expected to respect the diversity of our customers and suppliers in the same way we value differences of our employees.



There are no exceptions to this policy. Violations of this policy may result in disciplinary action up to and including termination of employment within the parameters of local law.

U.S. - Affirmative Action

Medtronic’s goal is to increase representation of women, people of color, veterans and individuals with disabilities. Our programs are designed to comply with all applicable federal, state and local laws, directives and regulations and cover all human resource actions including employment, compensation, benefits, training, education, tuition aid, transfers, promotions, demotions, terminations and social/recreational programs.

Within the U.S., Medtronic’s CEO and senior leadership team regularly receive and review affirmative action reports and have the responsibility to monitor progress, reinforce policies and hold the organization accountable to meet objectives.

Responsibility

Matt Walter, Chief Human Resources Officer, and his designee, Nicole Beech, Vice President, Global HR Services and Employee Relations, are responsible for leading Medtronic’s affirmative action efforts in the U.S. and ensuring that the principle of equal employment opportunity is understood and followed throughout all Medtronic global operations. The HR head for each Medtronic establishment is responsible for local U.S. affirmative action efforts. All members of management must be familiar with this policy, must fully support it, and are responsible for applying these principles in good faith. Medtronic posts this statement to inform applicants and employees of Medtronic's commitment to equal opportunity in employment. The U.S. Affirmative Action Plans for: Women and Minorities; Individuals with Disabilities; and Protected Veterans are located in local HR offices and may be reviewed by applicants and employees on weekdays during normal working hours.

**Procedures, Roles, and Responsibilities**

<b>Role</b>	<b>Responsibilities</b>
U.S. Human Resources Offices	Provide U.S. employees a copy of Affirmative Action Plans upon request during normal working hours

## Abbreviations, Acronyms, and Definitions

### References & Related Policies

<b>Reference ID</b>	<b>Title</b>

### FAQs

### Policy Contacts

<b>Role</b>	<b>Title</b>
Policy Sponsor	Nicole Beech, VP Global HR Services & Employee Relations
Policy Owner	Kasey Keiser, Sr Director HR Compliance
Policy Contact	Rs.hrcompliance@medtronic.com

### Appendices

[Appendix I: Equal Employment Opportunity Statement \(U.S. Only\)](#)

[Appendix II: Pay Transparency Non-Discrimination Statement \(U.S and Puerto Rico Only\)](#)

### Documentation History

<b>Date</b>	<b>Revision</b>	<b>Reason/Description</b>
01/29/2015	1.0	Initial Release
07/03/2018	1.1	Added Equal Remuneration Statement
01/27/2022	1.2	Added valid job requirements statement

## Harassment and Other Forms of Offensive Behavior (Global)

**Version 1.2**  
**Effective Date 10/01/2018**

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### **Purpose**

Medtronic is committed to fostering a diverse and productive work environment, including freedom from harassment and discrimination of any kind. The purpose of this policy is to build upon the principles relating to a productive work environment set out in the Medtronic Code of Conduct and provides further internal rules and guidelines in order to prevent and address harassment, discrimination and other forms of offensive behavior in Medtronic working environments around the world.

### **Scope**

This policy applies to all Medtronic employees, guests, vendors, clients, customers, consultants or contractors.

### **Policy Statement (Details)**

Medtronic maintains a strict policy that prohibits harassment or any discriminatory practice based on 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.

Sexual harassment is a form of unlawful sex discrimination. Medtronic will not tolerate harassment, sexual harassment or offensive conduct by or toward its employees, guests, vendors, clients, customers or consultants. Every employee of Medtronic has a responsibility to maintain a work place free of harassment and any other forms of offensive conduct. No employee of Medtronic is expected to tolerate or participate in any conduct prohibited by this policy while at work or engaged in Medtronic business. This policy applies to conduct in the workplace and in any work related settings outside the workplace such as during business trips, training sessions, seminars, tours, Company sponsored or authorized social events and other meetings or functions. Employees who violate this policy, or managers who knowingly allow such behavior to continue, will be subject to the applicable

Internal Complaints and Disciplinary Procedures in their country of employment, which may include suspension and/or termination of employment. Non-employees who violate this policy will be subject to other remedies as may be appropriate.

Medtronic does not consider conduct that violates this policy to be conduct within the scope or course of employment and does not sanction this conduct on the part of any employee, including a member of management.

### **Conduct Prohibited by this Policy**

Medtronic's policy and the laws of most countries prohibit harassment on the basis of 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.

Sexual harassment is specifically prohibited by this Policy, and sexual harassment includes any unwanted sexual advances, requests for sexual favors, or visual, verbal or physical conduct of a sexual nature when:

- Submission to that conduct is made a term or condition of employment;
- Or submission to or rejection of this conduct is used as a basis for employment decisions affecting the employee or the individual;
- Or the conduct has the purpose or effect of unreasonably interfering with an employee's work performance or it creates a hostile or offensive work environment.

Sexual harassment may occur between individuals of the same sex. Both males and females can be victims of sexual harassment, and both can be found to have engaged in conduct that constitutes sexual harassment or behavior that demeans and offends other individuals. This Policy also prohibits:

- 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, this policy prohibits 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 under this policy even if it does not meet the legal definition of harassment under state or federal law.

**Specific examples of conduct prohibited by this policy include, but are not limited to:**

- Verbal conduct or written material that is of a sexual nature or is otherwise offensive, threatening, or intimidating. This includes:
  - Verbal or written epithets, slurs, jokes, or negative stereotyping about a person's sex, gender, sexual orientation, race, color, religion, national origin, veteran status, age, or disability.
  - Suggestive or obscene innuendoes, jokes, or sexual comments.
  - Suggestive comments about an employee's body or dress.
  - Derogatory, abusive or threatening comments.
  - Derogatory or otherwise offensive posters, cartoons, photographs, or other graphic material posted or circulated in the workplace, or distributed electronically to Medtronic employees or through Medtronic resources.
- Unwelcome or unwanted sexual advances or physical conduct. This includes flirtations, propositions, leering, offensive gesturing, patting, pinching, hugging, cornering, kissing, fondling, assaults or other unwanted touching and any other physical contact considered unacceptable by another individual.
- Requests or demands for sexual favors including subtle or blatant expectations, pressures, or requests for any type of sexual favor accompanied by an implied or actual benefit or negative consequence to an individual's employment status.
- Intimidation, threats or creation of a hostile work environment in retaliation for rejected sexual demands, requests, physical contacts, or attentions.
- Interference with a co-worker's performance through unwanted sexual attentions, or sexual conduct that reduces personal productivity or safety during working time.

**Reporting Harassment/Offensive Conduct**

It is Medtronic's policy to encourage the reporting of all perceived incidents of harassment or offensive conduct regardless of the position of the offender. An employee who feels he/she has been subjected to behavior prohibited by this policy may immediately tell the offender to stop the unwanted behavior. The employee is expected and strongly encouraged to report the conduct, in accordance with the Internal Complaints and Disciplinary procedures in force in their country of employment. Supervisors and managers who receive complaints of behavior prohibited by this policy must immediately report

such complaints to their Human Resources representative, so that Medtronic can try to resolve issues internally.

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 sexual harassment, harassment or other offensive behavior. Employees who engage in any act of retaliation may be subject to disciplinary action, in accordance with the Internal Complaints and Disciplinary procedures in force in their country of employment, which may include 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 of harassing or offensive conduct.

Every employee is encouraged to raise any questions or concerns regarding this Policy with the appropriate Human Resource Representative.

This policy is subject to any applicable law in any country where Medtronic does business. To the extent that any provision of this policy is incompatible with any applicable law, the company will follow the applicable law.

**Procedures, Roles, and Responsibilities**

<b>Role</b>	<b>Responsibilities</b>
All Medtronic employees	Report all concerns or any questions relating to this policy to your manager or Human Resources

**Abbreviations, Acronyms, and Definitions**

Prohibited conduct is defined for the purposes of this policy as:

- 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, this policy prohibits 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 under this policy even if it does not meet the legal definition of harassment under state or federal law.
- Abusive conduct is 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.

### References & Related Policies

<b>Reference ID</b>	<b>Title</b>
	<a href="#">Procedure: U.S. Internal Complaints and Disciplinary Procedures for Harassment and Other Forms of Offensive Behavior</a>
	Global Workplace Safety and Security Policy

### FAQs

### Policy Contacts

<b>Role</b>	<b>Title</b>
Policy Sponsor	Nicole Beech, VP Global HR Services & Employee Relations
Policy Owner	Kasey Keiser, Sr HR Director
Policy Contact	Rs.hrcompliance@medtronic.com

## Appendices

[Appendix I: U.S. Harassment and Offensive Behavior Complaint Form](#)

[Appendix II: U.S. State Requirements Information Sheet](#)

## Documentation History

<b>Date</b>	<b>Revision</b>	<b>Reason/Description</b>
01/29/2015	1.0	Initial Release
03/31/2016	1.1	Clarification to existing practices and new regulations in California
10/01/2018	1.2	Addition of Appendices for new regulations in New York