

Medtronic

Medtronic Limited

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UK Modern Slavery Act Statement

September 2019

The United Kingdom (UK) Modern Slavery Act of 2015 require certain businesses to provide public disclosures regarding efforts to eradicate slavery and human trafficking from their supply chains.

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're committed to ensuring that our supply chain reflects our values and beliefs.

Employees of Medtronic and its external suppliers are required to adhere to the Medtronic Code of Conduct and 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.

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

- Adopting the Global Human Rights and Labor Standards Policy that prohibits the use of slavery and human trafficking in Medtronic facilities and by suppliers in Medtronic's supply chain.
- Adopting the Global Anti-Human Trafficking and Forced Labor Policy that reinforces the company's commitment to prohibit the use of human trafficking, slavery, and forced labour in Medtronic facilities and by its suppliers in their supply chain. (Policy available in Global Human Rights Program Report)
- Establishing the cross-functional Human Rights and Labor Standards Council, which serves as a forum for addressing human rights and labor standards issues, risks and performance in company operations and its supply chain.
- Publishing the Global Supplier Standards that set expectations for Medtronic suppliers' social, environmental and business conduct.
- Establishing Medtronic Global Supplier Standards Compliance program to monitor and verify certain suppliers' compliance with such standards through desk-top and on-site audits.
- Establishing the 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 operations.
- Launching a comprehensive Responsible Supply Management awareness training for employees with direct responsibilities for supplier selection and management.

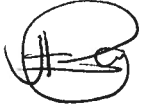
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- Incorporating social responsibility and environmental criteria in its supplier selection and management processes. The Global Supplier Standards, for instance, have been included in purchase order terms and conditions as well as supplier agreements.

This statement applies to Medtronic as well as all of its member companies, including Medtronic Limited, which distributes Medtronic products in the UK, acquires all such products from its affiliates and has no contracts with or access to external suppliers.



Jackie Fielding

Vice President UK & Ireland
