

Global Supplier Code of Conduct

At MiniMed, our mission—to make every day a better day for people with diabetes—serves as the foundation for everything we do. Our Code of Conduct sets the ethical standards and principles that guide our business practices daily, establishing the basis for workplace standards and expectations.

We expect our Suppliers to uphold the same high standards of conduct, social responsibility, and environmental stewardship that MiniMed follows, including:

- Complying with laws, rules, and regulations where they operate
- Respecting human rights, adhering to the UN Guiding Principles on Business and Human Rights
- Maintaining a safe and healthy workplace
- Practicing social and environmental responsibility
- Demonstrating the highest standards of business ethics

Our Supplier Code of Conduct defines the minimum requirements and expectations for ethical and sustainable business conduct, applying to all Suppliers, agents, and contract manufacturers involved in MiniMed business globally.

In providing goods or services to MiniMed, Suppliers certify their compliance with these standards. We reserve the right to evaluate, audit, and inspect Suppliers' facilities, operations, and records at any time to ensure adherence. MiniMed may take appropriate action, up to and including termination of the business relationship, in response to any violations.

Ethical Behavior

- **Anti-Corruption**

All Suppliers must fully comply with anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), and anti-money laundering laws of the countries in which MiniMed operates. MiniMed does not allow any bribes or improper payments, including kickbacks, unexplained rebates, payment for advertising, or gifts disguised as allowances or expenses.

- **Confidentiality**

Suppliers are expected to protect MiniMed proprietary and confidential information—and must enforce policies that comply with the confidentiality of the information.

- **Conflict of Interest**

Suppliers should avoid any transactions, relationships, or other acts that appear to be conflicts of interest.

- **Compliance**

Suppliers must fully comply with all applicable social, import/export and environmental laws. MiniMed requires notification of any significant compliance violations.

- **Responsible Minerals**

Suppliers are expected to comply with the MiniMed Responsible Minerals Policy by ensuring that any tin, tungsten, tantalum and gold (3TG) used in their products are sourced responsibly and do not contribute to human rights abuses by complying with all mandatory regulations.

- **Fair Competition and Antitrust**

Suppliers are expected to conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they operate or to which they are subject as a result of their business operations.

- **Human Rights**

Suppliers are expected to comply with the UN Guiding Principles on Business and Human Rights and provide notification of any significant compliance violations.

- **Intellectual Property**

Suppliers must safeguard MiniMed intellectual property rights and confidential information. Any use, disclosure and handling of MiniMed's technology, knowledge, and other MiniMed intellectual property must be in accordance with any applicable agreements.

- **Legal Compliance**

In addition to the other laws, regulations, and ordinances referenced in this Code of Conduct, Suppliers must fully comply with all applicable national, regional, provincial, state, and/or local laws, regulations, and ordinances. Suppliers must also be fully compliant with their obligations to any applicable agreement, understanding, or other binding commitment.

- **Policy on Gifts**

MiniMed employees may not accept gifts from any Supplier if the gift is more than modest in value, or if accepting the gift could create the appearance of a conflict of interest.

- **Privacy**

Suppliers are required to protect the personal information of their business partners, customers, patients, and others they do business with.

- **Animal Welfare**

Suppliers shall meet the same high standards of respectful, humane treatment of animals that MiniMed

does. These standards govern the general use of animals in training and research, including continuing efforts to replace and reduce their use with technological advances. The standards and protocols are published in MiniMed's [position regarding the use of animals](#).

Environmental Responsibility

MiniMed expects its Suppliers to conduct business in ways that help preserve natural resources (including finite and scarce resources, and biodiversity) and protect the environment (e.g. minimizing discharges of pollutants to air, water, and soil) and demonstrate accountability and transparency in sustainability performance through routine public disclosure and reporting of key sustainability issues. This includes obtaining and maintaining all necessary environmental permits, licenses, and approvals. Suppliers must notify MiniMed of any significant (i.e. written formally with or without associated fine) violations and take immediate actions to resolve them.

- **Energy and Emissions**

MiniMed encourages Suppliers to track Scope 1, 2, and 3 emissions, report progress annually through MiniMed's preferred reporting method, and set public goals to reduce greenhouse gas (GHG) emissions in alignment with the latest science. Suppliers are also encouraged to explore opportunities for energy efficiency improvements and conservation practices. Additionally, MiniMed supports efforts to procure and use electricity from renewable, low-carbon, and zero carbon energy sources where feasible.

- **Product Lifecycle and Circularity**

Suppliers must strive to design and deliver products, product components, and product packaging that are environmentally sustainable. This includes, but is not limited to, reducing the environmental footprint of products across their lifecycle, from sourcing and manufacturing to distribution, use, and end-of-life disposal. Suppliers should also explore opportunities for product innovation that reduces negative environmental impacts and adheres to circular design principles. Documentation of adherence to these criteria will be required.

- **Operational Risk and Resilience**

Suppliers shall conduct regular operational risk assessments and have systems in place to manage identified risks to reduce exposure to climate-related events, such as extreme weather and other operational interruption risks including but not limited to operations, logistics/transportation, material/component/resource, labor and/or other supply chain disruptions. This includes developing resilience strategies, adopting measures to enhance capacity, diversify supply sources and plan for infrastructure improvements. Suppliers shall communicate key operational risks to MiniMed as soon as possible.

- **Biodiversity**

Suppliers shall take steps to protect biodiversity and natural ecosystems. This includes avoiding operations in areas of high ecological value, minimizing land use impacts, and restoring ecosystems where possible. Suppliers are encouraged to engage in reforestation, afforestation, the prevention of deforestation, the mitigation of invasive species proliferation or other initiatives that support biodiversity.

- **Pollution**

Suppliers are expected to implement practices that prevent, mitigate, minimize, and/or contain air, water, noise, light, odor, and soil pollution. Hazardous substances should be responsibly managed and minimized, and Suppliers must have protocols in place for the safe handling, storage, and disposal of these materials.

- **Water Management**

Suppliers must implement water conservation strategies and ensure the sustainable use of water in their operations. This includes reducing water consumption, preventing water pollution, and managing wastewater and stormwater runoff responsibly. Suppliers operating in water-scarce regions must take additional steps to ensure responsible water use. Suppliers should set goals, track, and report progress annually via MiniMed's preferred reporting method.

- **Materials of Concern**

Suppliers must implement policies related to safe management of hazardous materials and the legal prohibition or restriction of specific substances. Products and Services supplied to MiniMed are expected to meet all applicable environmental regulations from country to local level. Suppliers of materials, packaging, components and finished devices are expected to not contain any restricted substances and must provide composition information and/or specific certifications to various regulations. This detailed information, declaring the raw materials and process chemicals used to manufacture the Products and packaging, is required to fulfill Regulatory Body requirements for approval for use and other environmental reporting obligations.

Social Responsibility

MiniMed strives to have a positive impact in the communities where it operates. We promote fundamental human rights and comply with all laws that govern labor practices, working hours and conditions, wages, and other issues that affect workers' health and safety.

MiniMed expects the same high commitment to social responsibility from its Suppliers. We require our Suppliers to comply with the UN Guiding Principles on Business and Human Rights and our Global Environmental Health and Safety policy. Any compliance violations need to be notified to MiniMed.

- **Child Labor**

MiniMed prohibits the use of any child labor. Suppliers must only use workers who meet the minimum

legal age for employment as defined by local law where they work. Regardless of the legal age for employment, MiniMed requires that workers be at least 18 years of age for certain types of work, such as dangerous work or night hours.

- **Equal Opportunities**

Suppliers must provide equal employment opportunity and fair and equal treatment to people regardless of their age, disability, nationality, pregnancy and maternity, race, gender, sexual orientation, or legal status. Equal opportunity must extend to all employment decisions, including recruiting, hiring, training, promotions, compensation, benefits, transfers, and workforce reductions.

- **Fair Compensation**

Suppliers must comply with all applicable national legal standards with regards to minimum wages, overtime, and maximum hour rules that are established by laws and regulations in operating regions.

- **Recruitment**

Suppliers must practice ethical recruitment (directly or through third-party agencies) and avoid worker exploitation through the recruitment process. Suppliers must prohibit confiscation of workers' identity documents; provide workers with a written document stating the terms and conditions of employment at the point of recruitment in a language the jobseeker can understand; and prohibit payment of recruitment fees by workers or require repayment when fees have been paid. Suppliers shall ensure that the third-party recruitment agencies are compliant with the provisions of this document and the law.

- **Forced Labor**

MiniMed prohibits the use of slavery, human trafficking and forced labor in Suppliers' facilities and operations, as well as the use of any form of coerced, bonded, indentured, or forced prison labor.

- **Freedom of Association and Collective Bargaining**

Suppliers must respect the rights of workers, without distinction, to form or join trade unions of their choosing and to bargain collectively.

- **Health and Safety**

Suppliers must provide a healthy, sanitary, and safe workplace environment for their workers and contractors that is free from physical, emotional, and verbal harassment, or any other abusive or threatening behavior. They are required to implement policies that prohibit the use of illegal weapons, alcohol, and illegal drugs and other controlled substances in the workplace. Accommodation, where provided or arranged, shall meet local safety and housing standards, and will be clean, safe, and meet the basic needs of the workers. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

Suppliers must also have measures in place that mitigate safety risks, monitor workplace injuries and illness, ensure emergency preparedness, and meet all applicable health & safety legislation. Workers

shall receive health and safety training on a regular basis, at a minimum, in compliance with local legislation and this training shall be documented. Additionally, Suppliers must notify MiniMed of any workplace injuries resulting in fatality or serious injury (i.e. amputation, hospitalization, spinal cord injuries, etc.) and must also notify MiniMed of any significant (i.e. written formal with or without associated fine) health and safety violations and take immediate actions to resolve them.

Business Conduct

- **Governance**

Suppliers shall establish clear policies and set measurable goals to create accountability of social and environmental topics across all levels of the organization, including oversight from executive leadership and board of directors, where applicable. Also, depending on the risk, some suppliers may be subject to surveys and/or third-party audits.

- **Management Systems**

MiniMed expects Suppliers to have systems in place that manage product quality, environmental impact, labor standards, health and safety risks, ethical business conduct, continuity risks, and continuous improvement. Suppliers must have adequate training programs for employees to ensure the appropriate level of knowledge and skills to meet the standards specified in these areas. They must also make these requirements with their own Suppliers. Obtaining certification of such management systems from accredited external bodies is also strongly encouraged.

- **Publicity**

MiniMed does not permit Suppliers to use its name, logo, or branding in public displays, documents, or marketing materials, including (but not limited to) websites, social media, press releases, trade shows, or facilities. Additionally, Suppliers may not publicly disclose their relationship with MiniMed or share any related products, parts, designs, or non-public information.

- **Transparency and Reporting**

Suppliers shall remain transparent about their business activities, structure, financial situation, performance, sustainability metrics and business as required by any applicable laws and industry standards.

- **Supply Chain**

Suppliers need to exercise reasonable due diligence over their own suppliers and subcontractors and ensure equivalent standards (conflict mineral/human rights/business continuity planning (including cybersecurity) are implemented throughout the supply chain.

MiniMed Office of Ethics and Compliance

If Suppliers and other external parties witness or experience potential misconduct related to the issues outlined in this document, they are encouraged to report their concern to MiniMed through the confidential MiniMed [Voice Your Concern](#) Line. This website includes toll-free numbers for the Voice Your Concern Line in the US (1-833-831-0635) and other countries. Specific questions regarding MiniMed's Global Supplier Code of Conduct can be addressed to rs.suppliercommunications@medtronic.com