CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT & UK MODERN SLAVERY ACT STATEMENT

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CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT & UK MODERN SLAVERY ACT STATEMENT

The California Transparency in Supply Chains Act of 2010 and the United Kingdom Modern Slavery Act require certain businesses to provide public disclosures regarding efforts to eradicate slavery and human trafficking from their supply chains. The disclosure is intended to provide consumers with information that will allow them to make more informed decisions about the goods they are purchasing.

Since our company’s start, St. Jude Medical has always led its business with integrity, focused on complying with applicable laws and regulations. We are committed to conducting business with suppliers who support our high standards of ethical conduct. We support the humanitarian goal of eliminating slavery and human trafficking in supply chains.

St. Jude Medical is taking the following steps to manage our supply chains relationships responsibly and is providing the information below in compliance with the disclosure requirements of the California Transparency in Supply Chains Act and the United Kingdom Modern Slavery Act:

- **Verification:** St. Jude Medical evaluates prospective suppliers through a business review process focused on risk-based assessments. We have taken steps to include, as part of this risk assessment process, measures intended to evaluate and address the risks of human trafficking and slavery in our supply chain. We do not use and do not plan to use a third party for these supply assessments.
Audit: St. Jude Medical conducts audits of suppliers who impact our quality system to confirm compliance with quality standards. These audits are not conducted via an independent unannounced audit. St. Jude Medical takes steps to confirm compliance with company standards in the areas of slavery and human trafficking by including, as part of our regular supplier audit activities, supplier confirmation of compliance with these standards.

Certification: Our standard contracts with suppliers require that the supplier certifies that the materials incorporated into the goods comply with the laws regarding slavery and human trafficking of the country or countries in which it does business and that it is also in compliance with all applicable laws.

Internal Accountability: St. Jude Medical’s Code of Business Conduct shares our principles on treating people honestly, fairly and with respect. It defines St. Jude Medical’s policies for promoting ethical business conduct and compliance with legal requirements that apply to our business. It also contains general standards for ethical business conduct but does not currently contain specific provisions addressing human trafficking and slavery. St. Jude Medical has adopted supply chain and quality policies and procedures that support our goals of responsible supply chain management (including efforts to eradicate slavery and human trafficking from the supply chain). Violation of company policies and procedures is reportable through our company’s Business Integrity HelpCenter. All such reports of allegations of violations will be promptly investigated and, if the result of the investigation indicates that corrective action is required, the company will decide what steps to take to rectify any problem and/or avoid the likelihood of its recurrence. Our company’s Business Integrity HelpCenter is available to anyone to report a concern about the business conduct of our employees or independent sales agents or to ask questions about our business conduct policies.

Training: St. Jude Medical provides training on our Code of Business Conduct for new and existing employees as well as training on other company policies. As of the end of the first quarter of 2016, St. Jude Medical has provided training on human trafficking and slavery, particularly with respect to mitigating risks within supply chains of products, to more than 90 percent of those existing company employees who have direct responsibility for supply chain management and has made this training mandatory for new-hires in the supply chain management area.
trademark and the property of its respective owner. See Terms and Conditions.