
PUBLIC POLICY STATEMENT

Boston Scientific Global Tax Strategy

Overview

Boston Scientific Corporation is headquartered in Massachusetts and has offices in 120 countries. Our operations have positive and diverse social and economic impacts around the world, strengthening the communities where our people live and work. Boston Scientific is dedicated to transforming lives through innovative medical solutions that improve the health of patients around the world.

We are committed to conducting business with unwavering ethics, strong corporate governance, and regulatory compliance. We insist on integrity in all our working relationships inside and outside the company. Our practices protect human rights, promote accountability, and ensure that we act responsibly as a global business and a global corporate citizen. We are guided by our core values (caring, diversity, global collaboration, high performance, meaningful innovation, and winning spirit). They define our culture and empower our employees in their everyday actions as they interact ethically with everyone: employees, partners and suppliers, customers, competitors, shareholders, and the community at large.

Consistent with our corporate and social responsibilities, we accept our role as a responsible taxpayer to pay our share of taxes, including corporate income taxes. We also pay a significant amount of taxes to national and local governments in the form of employment taxes, value added taxes, sales taxes, excise taxes, property taxes and customs duties. We also collect numerous taxes paid by our employees. We pay all taxes due in full and on time to the jurisdictions to which they are owed.

Our caring value guides us in how we engage with patients, how we work together as colleagues and how we invest in the well-being of communities. This includes our economic impact: not only the taxes we pay, but also the jobs we create, suppliers we engage, and donations of the time, talent and resources of our employees as they advance possibilities in their local communities to help those most in need.

This document outlines Boston Scientific's global approach to taxation with respect to:

- Tax governance, risk management and compliance
- Level of acceptable tax risk
- Tax planning
- Engagement with Tax Authorities

Tax Governance, Risk Management and Compliance

We are committed to complying with all applicable tax laws, regulations and disclosure requirements. Our tax professionals around the globe are committed to the highest compliance standards and have expertise in relevant tax laws and regulations. Compliance for Boston Scientific means paying the right amount of tax in accordance with applicable tax laws and regulations at the appropriate time, while

disclosing all relevant facts and circumstances to the applicable tax authority so that they can assess our tax liability.

Boston Scientific Corporation holds ultimate responsibility for the tax affairs of the total company, including each of our subsidiaries, and our Chief Financial Officer is ultimately responsible for Boston Scientific Corporation's overall tax position. The day to-day management of tax is performed by the company's global corporate tax department, which is led by the Vice President, Corporate Tax. Effective oversight of the tax function is maintained through at least semi-annual tax presentations and quarterly written updates to the Audit Committee of the Boston Scientific Corporation Board of Directors, presentations to the full board of directors as needed, as well as regular meetings among the Chief Financial Officer, the Vice President, Corporate Tax and other executive leaders to discuss emerging tax matters.

We maintain robust internal controls related to tax processes in accordance with accounting and reporting principles and we invest in new technology to continuously improve our financial systems. Management testing of controls is coordinated by our internal audit group.

Level of acceptable tax risk

We see compliance with tax laws and regulations as key to managing our tax risk. We strive for full compliance and are continuously improving our processes, which are based on standardization, simplification and automation. While we strive to be compliant with all applicable tax laws and regulations, there is an element of risk and uncertainty given the ever-changing global tax environment. This uncertainty and complexity of current international tax law is managed by an in-house tax department staffed by qualified, experienced tax professionals. In addition, we regularly seek advice from independent external tax advisors to minimize our tax risk.

Our approach to tax planning

We comply with tax laws and regulations on a worldwide basis and only engage in tax planning that is aligned with our commercial business activities and reputation. We are committed to the arm's length standard in transfer pricing and OECD guidelines for international tax matters. We have a zero-tolerance approach to tax evasion and the facilitation of tax evasion. Where uncertainty exists and when appropriate, we may seek clarification from our external advisors and/or governmental authorities. This can take the form of tax rulings or advanced pricing agreements from governmental authorities. We monitor proposals and changes to tax incentives and regulations in the countries in which we operate in order to assess their impact on our business, and we actively participate in industry groups interacting with government representatives to support the development of effective tax systems that encourage innovation and growth. We utilize available tax incentives and opportunities, such as research and development tax reliefs, in the letter and spirit in which they were intended.

Our engagement with Tax Authorities

We are committed to acting with integrity and transparency with all tax authorities. We seek to have a professional and constructive relationship with all tax authorities. We are committed to filing timely and accurate tax returns and responding openly and promptly to any questions that may be raised in relation to our tax returns. Like any multinational company, our tax returns are continuously under audit around the world. In the event a tax authority disagrees with our views on the appropriate tax

treatment of a given item, we will work constructively to try to resolve the issue in a timely manner through appropriate methods of dispute resolution. However, given the complex nature of international tax law, we may not always reach agreement with a tax authority on all tax matters.