DTCC | *Important Notice*
The Depository Trust Company

B #:	9792-18
Date:	December 12, 2018
To:	All Participants
Category:	Dividends
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	**Tax Relief Country:** Ireland **Security:** Medtronic PLC **CUSIP:** G5960L103 **Record Date:** 12/28/2018 **Payable Date:** 01/18/2019 **Relief at Source CA Web Cut-Off**: 01/08/2019 8:00 P.M. E.T **Quick Refund Cut-Off**: 01/28/2019 8:00 P.M. E.T

Participants can use DTC's Corporate Action Web (CA Web) service to certify all or a portion of their position entitled to the applicable withholding tax rate. Participants are urged to consult TaxInfo respectively before certifying their instructions over the CA Web.

Important: Prior to certifying tax withholding instructions, participants are urged to read, understand and comply with the information in the Legal Conditions category found on TaxInfo on the CA Web.

Questions regarding this Important Notice may be directed to GlobeTax +1 212-747-9100.

Important Legal Information: *The Depository Trust Company ("DTC") does not represent or warrant the accuracy, adequacy, timeliness, completeness or fitness for any particular purpose of the information contained in this communication, which is based in part on information obtained from third parties and not independently verified by DTC and which is provided as is. The information contained in this communication is not intended to be a substitute for obtaining tax advice from an appropriate professional advisor. In providing this communication, DTC shall not be liable for (1) any loss resulting directly or indirectly from mistakes, errors, omissions, interruptions, delays or defects in such communication, unless caused directly by gross negligence or willful misconduct on the part of DTC, and (2) any special, consequential, exemplary, incidental or punitive damages. To ensure compliance with Internal Revenue Service Circular 230, you are hereby notified that: (a) any discussion of federal tax issues contained or referred to herein is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code; and (b) as a matter of policy, DTC does not provide tax, legal or accounting advice and accordingly, you should consult your own tax, legal and accounting advisor before engaging in any transaction.*

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Non-Confidential

MEDTRONIC PLC has announced a cash dividend. Equiniti Trust Company acts as the U.S. Transfer Agent for this program.

Participants can use DTC's Corporate Actions Web (CA Web) instructions tab to certify all or a portion of their position entitled to the applicable withholding tax rate. Use of these instruction methods will permit entitlement amounts to be paid through DTC. By electing, Participants agree to the Agreements, Representations and Indemnification below.

All supporting documentation for exempt elections must be provided to GlobeTax acting on behalf of Equiniti Trust Company, the qualifying intermediary (the "QI") for Medtronic Plc by the applicable deadline stated below.

DIVIDEND EVENT DETAILS	
COUNTRY OF ISSUANCE	IRELAND
ISSUE	MEDTRONIC PLC
CUSIP#	G5960L103
UNDERLYING ISIN	IE00BTN1Y115
QUALIFYING INTERMEDIARY	EQUINITI TRUST COMPANY
RECORD DATE	DECEMBER 28, 2018
PAY DATE	JANUARY 18, 2019
GROSS DIVIDEND RATE ON PAY DATE	$ 0.50
STATUTORY WITHHOLDING RATE	20%
xBRL	NOT AVAILABLE

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By participating in the DTC CA Web process, Participants agree to comply with all audit requests made by the Irish Revenue Commissioners within twenty one days.

Note: the terms for dividend withholding tax exemption outlined throughout this notice apply to the current dividend with record date December 28, 2018. Future dividends may be subject to different requirements that will be outlined in subsequent important notices.

FEES & DEADLINES							
FILING METHOD	**BATCH**	**PAYMENT METHOD**	**SHARE MINIMUM**	**CUSTODIAL FEE**	**TAX RELIEF FEE**	**MINIMUM FEE PER BENEFICIAL OWNER**	**FINAL SUBMISSION DEADLINE**
RELIEF AT SOURCE	PAYMENT ON PAY DATE	DTC	NO MINIMUM	NO FEE	NO FEE	$0	JANUARY 8, 2019 8:00 P.M. ET
QUICK REFUND	FEBRUARY 5, 2019	DTC	NO MINIMUM	NO FEE	NO FEE	$0	JANUARY 28, 2019 8:00 P.M. ET
LONG FORM	POST-CA WEB PROCESS; ONGOING	CHECK OR ACH	NO MINIMUM	NO FEE	UP TO $0.0075 PER SHARE	$25.00	DECEMBER 1, 2023

WARNING AND DISCLAIMER:
THE INFORMATION AND DATA CONTAINED IN THIS NOTICE IS BASED ON INFORMATION OBTAINED FROM MULTIPLE SOURCES BELIEVED TO BE RELIABLE. HOWEVER, EQUINITI TRUST COMPANY AND ITS AGENTS DO NOT WARRANT OR GUARANTEE THE ACCURACY OR COMPLETENESS OF, NOR UNDERTAKE TO UPDATE OR AMEND THIS INFORMATION OR DATA. WE AND OUR AGENTS EXPRESSLY DISCLAIM ANY LIABILITY WHATSOEVER FOR ANY LOSS HOWSOEVER ARISING FROM OR IN RELIANCE UPON ANY OF THIS INFORMATION OR DATA. THE INFORMATION CONTAINED IN THIS NOTICE IS SUBJECT TO CHANGE AND SUBJECT TO DISCRETION AND/OR PRE-EMPTION BY LOCAL MARKET RULES, PRACTICES OR ACTIONS TAKEN BY NON-US AGENTS OR TAX AUTHORITIES. DEADLINES OFTEN DIFFER FROM STATUTORY DEADLINES. YOU SHOULD FILE CLAIMS AS SOON AS POSSIBLE, AND AT LEAST SIX MONTHS PRIOR TO THE SPECIFIED DEADLINE.

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ELIGIBILITY MATRIX – RELIEF AT SOURCE / QUICK REFUND

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
EXEMPT U.S. 0%	20%	QUALIFYING U.S. ENTITIES WITH A VERIFIED U.S. ADDRESS	NONE	N/A
RESIDENTS OF RELEVANT TERRITORIES (OTHER THAN THE U.S.) 0%	20%	ALBANIA, ARMENIA, AUSTRALIA, AUSTRIA, BAHRAIN, BELARUS, BELGIUM, BOSNIA & HERZEGOVINA, BOTSWANA, BULGARIA, CANADA, CHILE, CHINA, CROATIA, CYPRUS, CZECH REPUBLIC, DENMARK, EGYPT, ESTONIA, ETHIOPIA, FINLAND, FRANCE, GEORGIA, GERMANY, GHANA, GREECE, HONG KONG, HUNGARY, ICELAND, INDIA, ISRAEL, ITALY, JAPAN, KAZAKHSTAN, KOREA, REPUBLIC OF (SOUTH), KUWAIT, LATVIA, LITHUANIA, LUXEMBOURG, MACEDONIA, MALAYSIA, MALTA, MEXICO, MOLDOVA, MONTENEGRO, MOROCCO, NETHERLANDS, NEW ZEALAND, NORWAY, PAKISTAN, PANAMA, POLAND, PORTUGAL, QATAR, ROMANIA, RUSSIA, SAUDI ARABIA, SERBIA, SINGAPORE, SLOVAK REPUBLIC, SLOVENIA, SOUTH AFRICA, SPAIN, SWEDEN, SWITZERLAND, THAILAND, TURKEY, UKRAINE, UNITED ARAB EMIRATES, UNITED KINGDOM, UZBEKISTAN, VIETNAM, ZAMBIA	1. COVER LETTER 2. NON-RESIDENT V2 FORM	1. YES – DTC PARTICIPANT 2. YES – BENEFICIAL OWNER
OTHER ELIGIBLE ENTITIES 0%	20%	A COMPANY THAT IS RESIDENT OUTSIDE OF THE RELEVANT TERRITORIES BUT IS CONTROLLED BY A PERSON OR PERSONS THAT IS OR ARE RESIDENT IN A RELEVANT TERRITORY OR BY A COMPANY THAT IS SUBSTANTIALLY AND REGULARLY TRADED ON A RECOGNIZED STOCK EXCHANGE IN A RELEVANT TERRITORY	1. COVER LETTER 2. NON-RESIDENT V2 FORM	1. YES – DTC PARTICIPANT 2. YES – BENEFICIAL OWNER
EXEMPT ELIGIBLE IRISH ENTITIES 0%	20%	IRISH RESIDENT COMPANIES, PENSION SCHEMES, QUALIFYING EMPLOYEE SHARE OWNERSHIP TRUSTS, COLLECTIVE INVESTMENT UNDERTAKINGS OR CHARITIES	1. COVER LETTER 2. COMPOSITE RESIDENT V3 FORM	1. YES – DTC PARTICIPANT 2. YES – BENEFICIAL OWNER

***Note: All documents listed in BLUE font are generated by GlobeTax's ESP website after submission of beneficial owner data.**

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ELIGIBILITY MATRIX – LONG FORM

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
EXEMPT U.S. 0%	**20%**	QUALIFYING U.S. ENTITIES WITH A VERIFIED U.S. ADDRESS (CLAIMED UNFAVORABLE THROUGH CA WEB)	1. COVER LETTER 2. DTC PARTICIPANT POWER OF ATTORNEY	1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT
EXEMPT RESIDENTS OF RELEVANT TERRITORIES (OTHER THAN THE U.S.) 0%	**20%**	ALBANIA, ARMENIA, AUSTRALIA, AUSTRIA, BAHRAIN, BELARUS, BELGIUM, BOSNIA & HERZEGOVINA, BOTSWANA, BULGARIA, CANADA, CHILE, CHINA, CROATIA, CYPRUS, CZECH REPUBLIC, DENMARK, EGYPT, ESTONIA, ETHIOPIA, FINLAND, FRANCE, GEORGIA, GERMANY, GHANA, GREECE, HONG KONG, HUNGARY, ICELAND, INDIA, ISRAEL, ITALY, JAPAN, KAZAKHSTAN, KOREA, REPUBLIC OF (SOUTH), KUWAIT, LATVIA, LITHUANIA, LUXEMBOURG, MACEDONIA, MALAYSIA, MALTA, MEXICO, MOLDOVA, MONTENEGRO, MOROCCO, NETHERLANDS, NEW ZEALAND, NORWAY, PAKISTAN, PANAMA, POLAND, PORTUGAL, QATAR, ROMANIA, RUSSIA, SAUDI ARABIA, SERBIA, SINGAPORE, SLOVAK REPUBLIC, SLOVENIA, SOUTH AFRICA, SPAIN, SWEDEN, SWITZERLAND, THAILAND, THE REPUBLIC OF TURKEY, UKRAINE, UNITED ARAB EMIRATES, UNITED KINGDOM, UZBEKISTAN, VIETNAM, ZAMBIA	1. COVER LETTER 2. DTC PARTICIPANT POWER OF ATTORNEY 3. DIVIDEND WITHHOLDING TAX REFUND CLAIM FORM 4. NON-RESIDENT V2 FORM	1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. YES – DTC PARTICIPANT OR FINAL BENEFICIAL OWNER 4. YES – FINAL BENEFICIAL OWNER
OTHER ELIGIBLE ENTITIES 0%	**20%**	A COMPANY THAT IS RESIDENT OUTSIDE OF THE RELEVANT TERRITORIES BUT IS CONTROLLED BY A PERSON OR PERSONS THAT IS OR ARE RESIDENT IN A RELEVANT TERRITORY OR BY A COMPANY THAT IS SUBSTANTIALLY AND REGULARLY TRADED ON A RECOGNIZED STOCK EXCHANGE IN A RELEVANT TERRITORY	1. COVER LETTER 2. DTC PARTICIPANT POWER OF ATTORNEY 3. DIVIDEND WITHHOLDING TAX REFUND CLAIM FORM 4. NON-RESIDENT V2 FORM	1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. YES – DTC PARTICIPANT OR FINAL BENEFICIAL OWNER 4. YES – FINAL BENEFICIAL OWNER
EXEMPT ELIGIBLE IRISH ENTITIES 0%	**20%**	IRISH RESIDENT COMPANIES, PENSION SCHEMES, QUALIFYING EMPLOYEE SHARE OWNERSHIP TRUSTS, COLLECTIVE INVESTMENT UNDERTAKINGS OR CHARITIES	1. COVER LETTER 2. DTC PARTICIPANT POWER OF ATTORNEY 3. COMPOSITE RESIDENT V3 FORM	1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. YES – FINAL BENEFICIAL OWNER

Note: All documents listed in BLUE font are generated by GlobeTax's ESP website after submission of beneficial owner data.

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DESCRIPTION OF VARIOUS DOCUMENTATION		
DOCUMENT NAME	**DESCRIPTION**	**ORIGINAL / COPY**
COVER LETTER (APPENDIX A)	Cover letter required for all At-Source claims.	ORIGINAL
DIVIDEND WITHHOLDING TAX REFUND CLAIM FORM	Claim for repayment of Irish tax on dividends form. This form needs to be certified by the beneficial owner's local tax office for non-U.S. entities.	ORIGINAL
NON-RESIDENT V2 FORM (V2A, V2B, V2C)	Irish dividend withholding tax exemption declaration form for non-U.S. relevant territory beneficial owners. This form needs to be certified by the beneficial owner's local tax office for non-U.S. entities.	COPY
COMPOSITE RESIDENT V3 FORM	Irish dividend withholding tax exemption declaration form for eligible Irish beneficial owners.	COPY
BENEFICIAL OWNER POWER OF ATTORNEY	A document issued by the beneficial owner to the DTC Participant if the Participant is signing the Dividend Withholding Tax Refund Claim Form or Non-Resident V2 form on behalf of the beneficial owner. This document must be on the beneficial owner's letterhead.	COPY
DTC PARTICIPANT POWER OF ATTORNEY	A document issued by the DTC Participant to the Transfer Agent authorizing the Transfer Agent to file the long form reclaim and receive payment on the Participant's behalf. This document must be on the DTC Participant's letterhead.	COPY
EXCEL SPREADSHEET	Beneficial Owner breakdown to be included with submissions exceeding five beneficial owners.	COPY
ELIGIBILITY MATRIX	Description/Clarification of eligibility for varies investor types and special circumstances.	N/A

CONTACT DETAILS	
PRIMARY CONTACT	BROOKS ROBINSON
PHONE	1-212-747-9100
FAX	1-212-747-0029
EMAIL ADDRESS	BROOKS_ROBINSON@GLOBETAX.COM
GROUP EMAIL	IRELANDESP@GLOBETAX.COM
COMPANY	GLOBETAX SERVICES INC.
STREET ADDRESS	ONE NEW YORK PLAZA - 34TH FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004
ADDITIONAL CONTACTS	LAURA GALLO

ESP powered by GLOBETAX

Equiniti Trust Company offers ESP powered by GlobeTax, which allows for the secure and simplified transfer of beneficial owner level data from the Participant to Equiniti Trust Company, and creates applicable documentation on the Participant's behalf. These claims should be submitted through the following website:

https://esp.globetax.com

This system is available for At Source, Quick Refund, and Long Form claims.

Please contact support@globetax.com at 212-747-9100 if you have any questions about this process.

FREQUENTLY ASKED QUESTIONS (FAQs)

What is the difference between the V2 forms A, B, and C and which one needs to be completed?	The V2 forms A, B, and C each pertain to different types of beneficial owners and should be selected based on the final beneficiary. Qualifying non-resident individuals must use the V2A, qualifying non-resident companies must use the V2B, and all other qualifying non-resident persons (not being an individual or a company) must use the V2C.
Can financial institutions holding under a DTC participant benefit from Relief At-Source for their underlying holders?	To be eligible to reclaim through Relief At Source or Quick Refund all institutions involved in the payment between DTC and the final beneficial owner (not including the final BO) must be an Irish Qualified Intermediary (QI) as defined in Irish legislation or domiciled in the United States. If one of more of the institutions are not an Irish QI and are outside of the U.S., exemption cannot be applied At Source. For example, if the DTC participant is a Canadian Bank without Irish QI status they cannot participate in Relief At Source or Quick Refund. However, the beneficial owner may still be eligible to reclaim through the long form process - requirements described above.
Can I submit a trust agreement in lieu of a POA signed by the beneficial owner?	**Yes**, but a limited POA signed by the participant must be accompanied by the trust agreement.
How long does it take for long-form claims to be paid?	We estimate it takes 4 months for long form claims to be paid.
Does the long-form process have a minimum position requirement per beneficial owner?	**No**, there is a minimum fee of $25 per beneficial owner which may be waived on an exceptional basis for clients reclaiming less than $50. In such instances a fee of 50% of the reclaimed amount will be applied.
What is the statute of limitations for filing Irish reclaims?	It is 4 years from the end of the year in which the dividend is paid. Claims received after our submission deadline will be filed in good faith.
What happens if the participant does not make a CA web election within the specified CA web election window?	All shares will be withheld at the 20% tax rate. You will have an opportunity to file long form if this transpires.
Will GlobeTax accept claims filed directly to them by beneficial owners?	GlobeTax only accepts claims filed by the DTC Participant who was holding the securities through DTC and only to the extent that DTC has reported these holdings to us as valid record date holdings. Beneficial owners are required to file their claims through the custody chain to the DTC Participant of record. All claims not received directly from the DTC Participant will be returned to the beneficial owner.

FORMS AND ATTACHMENTS *Double Click on respective icon to view		
APPENDIX A – AT-SOURCE COVER LETTER ***For Non-ESP users ONLY*	**EXCEL BREAKDOWN** ***For Non-ESP users ONLY*	**ELIGIBILITY MATRIX – INVESTOR TYPE**
 Appendix A.pdf	 Microsoft Excel Worksheet	 Eligibility Matrix.pdf

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