Exhibit C: Pattern of Discriminatory Promotion Practices

Summary of Promotion Process Deviations and Comparative Advancement Data

Anderson v. Boston Scientific Corporation (NYSE: BSX) & Aaron Clark

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Executive Summary: The "Motive"

This exhibit details a multi-year pattern of systemic bias in promotion practices within the Minnesota Packaging Engineering Department. It demonstrates that qualified, long-tenured minority employees were consistently subjected to procedural barriers, while less-experienced Caucasian colleagues were advanced through non-competitive processes. This pattern establishes **the *motive*** for the subsequent defamatory performance reviews and retaliatory actions, which were used to justify a predetermined discriminatory outcome.

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1. The Systemic Pattern: Disparate Career Outcomes

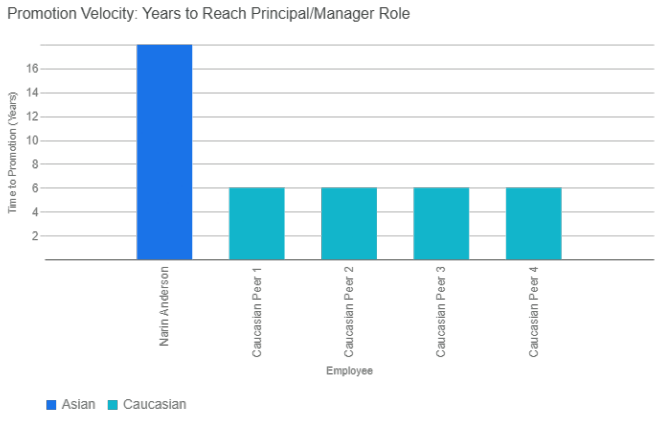
The career paths of Narin Anderson's direct peer group illustrate the systemic nature of this bias. A review of colleagues who started as Senior Engineers at the same time and worked on the same projects reveals a stark divergence in outcomes based on ethnicity.

> "*At least 8 individuals whom I've worked with in the past who were all Senior Engineers at the same time working in the same projects who have since become Directors (2), Vice Presidents (2), Fellows (2), Senior Managers (2)* ***all of whom are Caucasian****."*

2. The Verifiable Proof: Disparate Advancement Velocity

This broad pattern is confirmed by specific, verifiable data. The chart below contrasts the 18 years it took Narin Anderson (Asian) to achieve a single promotion with the 6-year timeframe for his Caucasian peers to achieve an equivalent or higher (Manager) level.

Promotion Velocity: Years to Reach Principal/Manager Role



Quantitative review of advancement intervals indicates a statistically disproportionate rate of promotion by race. Narin Anderson, an Asian engineer, waited 18 years for his first promotion to Principal Engineer. In stark contrast, Caucasian colleagues in the same group advanced to Principal Engineer or Manager in approximately one-third of that time.

Promotion Velocity: Narin Anderson vs. Caucasian Colleagues

- **Narin Anderson (Asian):** 18 Years (Sr. Engineer → Principal Engineer)
- **Caucasian Peer 1 (Male):** 6 Years (Engineer II → Principal Engineer)
- **Caucasian Peer 2 (Female):** 6 Years (Sr. Engineer → Principal Engineer)
- **Caucasian Peer 3 (Female):** 6 Years (Engineer II → Manager)
- **Caucasian Peer 4 (Female):** 6 Years (Sr. Engineer → Manager)

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3. The Procedural Pattern: Non-Competitive Appointments

This disparity was enabled by documented departures from standard competitive-selection procedure, where management roles were filled without a competitive interview process, blocking qualified candidates like Narin.

- **Manager I, PI Pkg NPD (2024):** This position, formerly held by Keith Robertson, was given to Aaron Clark (Caucasian male) without an open interview process.
    - **Management's Rationale (per Keith):** "HR didn't want to have an interview process & desire to rapidly fill role".
- **Former Pkg Mgr Role (2011):** This role was given to a Caucasian male without interviews.

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4. The Pretext: A "Catch-22" for Advancement

When Narin *did* formally apply for an open management role (Manager I, Pkg Acquisitions), he was denied an interview based on a ***stated rationale*** is inconsistent with contemporaneous application materials, indicating potential pretext.".

- **The Rejection (March 3, 2025):** Manager Richard Tuma (former direct Manager) rejected Narin's application without an interview, stating, "As for the management role, we were looking for a people manager with **people management experience**...".
- **The Rebuttal (The Fact):** This rationale was pretextual. Narin's cover letter for the role explicitly detailed his experience managing technicians, interns, and mentoring less-experienced engineers—the exact experience Richard Tuma claimed he was "looking for."

Finding Summary for Counsel

This evidence demonstrates that Narin Anderson was trapped in a systemic "Catch-22." When roles were open, he was denied an interview based on manufactured pretext. When roles were not open, they were given to less-tenured Caucasian colleagues without a competitive process.

The comparative data and procedural records collectively establish a plausible discriminatory motive underlying subsequent adverse actions that provides the motive for the subsequent "how" - the use of falsified performance documents to remove a 25-year, high-performing Asian engineer who had begun to formally question this very practice.