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3M Supplier Responsibility Code

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Introduction

At 3M, we are committed to improving our business, our planet, and every life. Our employees demonstrate that commitment every day in our own operations and in the communities in which we live and work. We recognize the choices we make for our material and service providers must also reflect these values. We want our suppliers to share our commitment to maintaining compliant, responsible and sustainable operations and practices.

The 3M Supplier Responsibility Code outlines 3M’s basic expectations for our suppliers in the areas of Management Systems, Labor, Health and Safety, Environment and Ethics. This Code is based on our corporate values for sustainable and responsible operations, and also aligns with the 10 Principles of the United Nations Global Compact, of which 3M is a signatory, and with the Responsible Business Alliance (RBA), formerly Electronic Industry Citizenship Coalition (EICC) Code of Conduct.

Fundamental to conforming to this Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules and regulations of the locations in which it operates. Suppliers must maintain compliance systems and be able to demonstrate a satisfactory record of compliance with laws and regulations in conducting their business. 3M also encourages suppliers to go beyond legal compliance, drawing upon internationally recognized standards to advance social and environmental responsibility and business ethics.

Conformance to this Code is required to become or remain a supplier to 3M, anywhere in the world, and for any supplied material or service. Our suppliers are also expected to hold their subcontractors and suppliers accountable to the principles in this Code. It is the supplier’s responsibility to disseminate and educate the requirements of this Code to their employees, agents, subcontractors and suppliers. We expect our suppliers to communicate their conformance status to us when requested and to make any necessary improvements to ensure full conformance. 3M will monitor its suppliers’ performance against this Code as we deem necessary, including requesting specific performance information. We encourage and expect our suppliers to periodically assess themselves and their suppliers for conformance.

If non-conformance to this Code is detected, 3M will attempt to work with the supplier concerned to correct the situation. We expect the supplier to develop a corrective action plan to bring its operations into Code conformance so that supply to 3M can continue. If a supplier does not develop such a plan or fails to implement it, 3M may move to terminate the business relationship.

If, however, a supplier demonstrates not only conformance to this Code, but additional dedication to improving the sustainability of their operations, they may positively distinguish themselves from their competition. We encourage all suppliers to take a proactive approach to responsible and sustainable operations by establishing and implementing their own relevant policies and programs, and expecting their suppliers to do the same. In addition, 3M is committed to the continuous improvement of all areas of the Supplier Responsibility Code and expects its suppliers to have the same level of commitment within their own programs.

3M’s 2025 Sustainability Goals are focused not only on our own operations, but also the sustainability goals and needs of our broader value chain, including our suppliers. We can realize far greater impact when we collaborate to understand and overcome the challenges we face in partnership with others. Our mutual environmental and social challenges and needs represent shared opportunity. Together, we can improve our businesses, our communities, and every life.





arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms as agreed upon by both parties. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to employees' identity or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

A. LABOR

In addition to full compliance with all applicable labor and human resource laws, we expect our suppliers to be committed to upholding the human rights of workers and treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

Our supplier labor standards are:

1) Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, trafficked or slave labor shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process for workers entering the country specifically to work for the supplier, workers must be provided with a written employment agreement in their native language that describes terms and conditions of employment prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon

2) Young Workers

Suppliers must comply with the applicable local laws with regard to the minimum hiring age for employees. If no such law exists or if the existing law permits the hiring of workers younger than 18 years of age (Young Workers), the supplier may not employ anyone under 15 years of age. Young workers shall not perform hazardous work. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be similar to other entry-level workers performing equal or similar tasks.

3) Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed legally mandated breaks, holiday and vacation days to which they are legally entitled, including time off when ill or for maternity leave. Further, workers shall be allowed at least one day off every seven days.

4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, suppliers shall compensate workers for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted, unless due to serious violation(s) resulting in a suspension. For each pay period, suppliers shall provide workers with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

5) Humane Treatment

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

6) Non-Discrimination

Suppliers should commit to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, access to training, reduction in workforce or terminations. Suppliers shall reasonably accommodate workers for religious practices. In addition, suppliers should not subject workers or potential workers to medical tests or physical exams that could be used in a discriminatory way. Physical assessments to determine capability to perform the job are appropriate if based on physical job requirements.

7) Freedom of Association

In conformance with local law, suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

3M is committed to doing our part to help abolish forced and child labor and human trafficking around the world. This commitment is evident in these supplier expectations and in our own [Human Rights Policy Statement](#). We recognize we have an important role to play in confirming that these abhorrent practices are not part of our supply chain, and we expect our suppliers to be able to demonstrate that these expectations are being addressed.

Recognized standards such as the [United Nations Guiding Principles on Labor and Human Rights](#), the [UN Global Compact Principles 1-6 on Human Rights and Labor](#), and [SA8000](#) may be useful sources of additional information.

B. HEALTH and SAFETY

In addition to full compliance with all applicable health and safety laws, we expect our suppliers to minimize the incidence of accidental work-related injury, death and illness, and foster a safe and healthy work environment. Suppliers should utilize ongoing worker input and education as essential opportunities to identify and solve health and safety issues in the workplace.

Our supplier health and safety standards are:

1) Occupational Safety

Worker potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, excessive noise, and fall hazards) is to be identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Supplier's workplace shall have appropriate lighting and temperatures. Reasonable steps must also be taken to work with pregnant women/nursing mothers in evaluating working conditions. Suppliers should remove or reduce any workplace health and safety risks identified for pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodation as appropriate.

2) Emergency Preparedness

Suppliers are to identify and assess potential emergency situations and events, and minimize their impact by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation

procedures, worker training and drills, appropriate fire detection and suppression equipment, including accessibility of fire extinguishers, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property. Exit doors, stairwells and routes shall be clearly marked and kept clear of obstructions.

3) Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

4) Industrial Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment. Protective programs



shall include educational materials about the risks associated with these hazards.

5) Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

6) Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where



We take workplace health and safety seriously, and we expect our suppliers to do the same. If you are facing a workplace safety challenge, 3M may be able to help: we have been developing worker health and safety solutions for decades. Feel free to contact us anytime to discuss how we can work together to make safer workplaces everywhere.

Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health may be useful sources of additional information.

machinery presents an injury hazard to workers.

7) Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the supplier or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation, individually secured

accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8) Health and Safety Communication

Supplier shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand, for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical,

chemical, fire, and physical hazards language. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns.



C. ENVIRONMENTAL

In addition to full compliance with all applicable environmental laws, we expect our suppliers to integrate environmental responsibility into their operations. Suppliers should work to minimize adverse effects on the community, environment and natural resources, while safeguarding the health and safety of workers and the public.

Our supplier environmental standards are:

1) Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

2) Hazardous Substances

Chemicals and other materials (including wastes) posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

3) Solid Waste

Supplier shall implement a systematic approach to identify, manage, and responsibly dispose of or recycle solid waste (non-hazardous).

4) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Supplier shall conduct routine monitoring of the performance of its air emission control systems where appropriate.

5) Materials Restrictions

Suppliers are to adhere to all applicable laws, regulations and 3M requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal. At 3M's request, Suppliers are expected to provide to 3M reports on the occurrence of substances in any materials supplied to 3M that may be restricted by, or require disclosure to, governmental bodies, customers and/or recyclers.

6) Water Management

Supplier shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Supplier shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance as appropriate.

7) Energy Consumption and Greenhouse Gas Emissions

Significant energy consumption and greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Suppliers are to look for cost-effective methods to improve energy efficiency in their operations and to minimize their energy consumption and greenhouse gas emissions.

8) Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

9) Transportation

Suppliers are expected to comply with all applicable laws governing the transportation of goods and materials. If handling Hazardous Materials* in the United States, suppliers are expected to be registered with the U.S. Department of Transportation as a Hazardous Materials shipper and are expected to be trained, tested and certified to package, mark, label and ship Hazardous Materials as required by law. If handling Dangerous Goods* outside the United States, suppliers are expected to be trained in and shall comply with applicable transportation regulations for air, ocean or land cargo.

**Hazardous material/dangerous good means a substance or material that has been determined by a regulatory agency (i.e., U.S. Department of Transportation, International Maritime Dangerous Goods Code of the International Maritime Organization, etc.) to be an unreasonable risk to health, safety and property when transported in commerce and which has been so designated.*

10) Legally Harvested Plant Materials

Suppliers are expected to supply to 3M materials containing plant materials or their derivatives that are legally sourced, harvested and exported from their country of origin. Suppliers are expected to adopt policies and management systems with respect to the U.S. Lacey Act, the EU Timber Regulation and similar laws and to require their suppliers to adopt similar policies and systems. Further, 3M has a detailed Pulp and Paper Sourcing Policy with additional traceability, environmental and social expectations for suppliers of all types of paper and pulp materials.

11) Conflict Minerals

If materials supplied to 3M contain any tantalum, tin, tungsten or gold that are necessary to the production or functionality of such products under Section 1502 of the U.S. Dodd-Frank Act and its implementing regulations, supplier must: (i) disclose the presence of these minerals; (ii) provide on request information on the smelters and refiners in the relevant supply chains of these minerals and other information consistent with industry standard conflict minerals reporting templates; (iii) adopt a policy to reasonably assure that the minerals do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of Congo, adjoining countries or any other high-risk area of the world as determined by regulatory bodies and as applied by Responsible Minerals Initiative (RMI) (“high-risk areas”); and (iv) adopt a due diligence management system regarding the minerals and require their suppliers to adopt a policy and management system. 3M has a dedicated Conflict Minerals Website outlining 3M’s efforts for Responsible Sourcing. Conflict Minerals Website

Global environmental challenges like climate change, water quality and scarcity and energy availability affects all our businesses and every person on the planet. 3M is doing its part through our [2025 Sustainability Goals](#) to continue reductions in raw material usage/waste, water and energy usage, and greenhouse gas emissions. Similarly, we expect our suppliers to find and act on opportunities to reduce their environmental impacts in a responsible way. We welcome opportunities to collaborate with our suppliers to make a positive impact on the world. Suppliers should work with their 3M Sourcing Category Owner to collaborate on potential opportunities.

Recognized management systems such as [ISO 14001](#) and the [Eco Management and Audit Scheme \(EMAS\)](#), and [UNGC Principles 7-9 on Environment](#) may be useful sources of additional information.



D. ETHICS

In addition to full compliance with all applicable business ethics laws, to meet social responsibilities and to achieve success in the marketplace, our suppliers and their agents are to uphold the highest standards of ethics.

Our supplier ethics standards are:

1) Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on supplier's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws including but not limited to the United Kingdom Bribery Act and the United States Foreign Corrupt Practices Act. Suppliers should conduct appropriate risk-based diligence prior to engaging contractors or other third parties to ensure that such third parties comply with this Code and the anti-corruption laws.

2) Anti-corruption

Supplier shall comply with all applicable anti-bribery laws while conducting business on behalf of 3M. Supplier shall not engage in any form of bribery, kickbacks, corruption, extortion, money laundering or embezzlement. Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, direct the hiring of any person or otherwise gain an improper advantage.

3) Gifts and Entertainment

Supplier must not provide any gift, meal or entertainment to a 3M employee that might influence, or appear to influence, a 3M employee's decision in relation to the supplier. Business decisions must be made on the basis of fair and objective criteria. Gifts, meals or entertainment may be offered to a 3M employee if modest in value, infrequent, not in the form of cash or cash equivalents, hosted in locations that will not bring reputational harm, free from the appearance of improper influence, consistent with customary business practice, and such gift, meal or entertainment does not violate Supplier's internal policies or any laws.

4) Conflicts of Interest

Supplier must not enter into any transaction with 3M employees that could create an actual or perceived conflict of interest. A conflict of interest is any situation where an individual's interests or relationships could inappropriately influence, or appear to inappropriately influence, decisions an individual makes on 3M's behalf. Even the perception of a conflict of interest between a 3M employee and a supplier could be detrimental to 3M's business interests and reputation.

5) Disclosure of Information

All business dealings shall be transparently performed and accurately reflected on supplier's books and records. Supplier shall disclose information regarding labor, health and safety, environmental practices, business activities, structure, financial situation and performance consistent with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices is not acceptable.

6) Intellectual Property

Supplier shall respect intellectual property rights, ensure technology and know-how is transferred in a manner that protects intellectual property rights and ensures customer and supplier information is safeguarded.

7) Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld.

8) Reporting, Protection of Identity and Non-Retaliation

Supplier shall have adequate systems to address employee concerns and grievances. Those systems must protect confidentiality, allow anonymity of reporting unless prohibited by law, and protect employees against retaliation.

9) Privacy

Supplier shall protect the personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

3M is committed to operating with uncompromising honesty and integrity in everything we do. The [3M Code of Conduct](#) clearly defines what is expected of all employees and other individuals representing 3M. When we choose to do business with you, our supplier, we associate the actions and reputations of our two companies. Therefore, it is in both of our organizations' best interests to maintain the highest ethics.

The [UN Convention Against Corruption](#) and [UNGC Principle 10 on Anti-corruption](#) may be useful sources of additional information.



E. MANAGEMENT SYSTEM

Suppliers are expected to adopt or establish a management system covering the elements of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the supplier's operations, products and services; (b) conformance with this Code; and (c) identification and mitigation of risks related to this Code. It should also be designed to facilitate continuous improvement with all aspects of the Code.

The management system should contain the following elements:

1) Company Commitment

Corporate social and environmental responsibility policy statements affirming the supplier's commitment to compliance and continuous improvement, endorsed by executive management and posted or otherwise made available in the supplier's facility (where applicable) in the local language.

2) Management Accountability and Responsibility

The supplier clearly identifies senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis. Supplier shall have a process to assess that sufficient and qualified resources are assigned to their own Supplier Responsibility Code.

3) Legal and Customer Requirements

A process to identify, monitor and understand applicable laws and regulations, and the requirements of this Code.

4) Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5) Improvement Objectives

Written performance objectives, targets and implementation plans to improve the supplier's performance against this Supplier Responsibility Code, including a periodic assessment of supplier's performance in achieving those objectives.

6) Training

Programs for new and ongoing training of managers and workers to implement supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements and this Code.

7) Communication

A process for communicating clear and accurate information about supplier's policies, practices, expectations and performance to workers.

8) Worker Feedback, Participation and Grievance

Ongoing effective processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code to aid with conformance and foster continuous improvement.

9) Audits and Assessments

Periodic self-evaluations to ensure conformance to legal and regulatory requirements and the content of these Standards.

10) Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

11) Documentation and Records

Processes and controls to ensure accurate books and records, and creation and maintenance of documents and records to ensure regulatory compliance and conformance to company requirements, along with appropriate confidentiality to protect privacy.

12) Supplier Responsibility

A process to communicate the 3M Supplier Responsibility Code requirements to next-tier suppliers and to require suppliers to adopt management systems and practices for compliance to this Code or requirements materially consistent with this Code.

3M believes that robust and comprehensive management systems are necessary to achieve and maintain control of any complex program. A one-time review and implementation of these expectations is not enough to ensure ongoing conformance. Our strongest suppliers will demonstrate ownership of conformance to this Code by institutionalizing these practices into their culture and everyday actions, with systems in place to continually monitor and improve performance as well as assure their suppliers are doing the same.

The OECD Guidelines for Multinational Enterprises and their Due Diligence Guidance may be useful sources of additional information.

Questions? Refer to the [Supplier Resources page](#) on 3M.com, or call the Sourcing Operations Response Center at 651-575-6450.

