

EHS&PS Acquisitions, Mergers and Divestitures Standard

Applies To

This standard applies worldwide to all workers involved in 3M acquisitions, mergers, divestitures, joint ventures and associated real estate transactions.

Introduction and Background or Purpose

3M regularly pursues the sale and purchase of business interests. The intent of this policy is to help ensure that potential Environment, Health, and Safety (EHS) and product stewardship (PS) issues are identified, evaluated, and communicated for each real estate transaction and for each business that may be acquired or divested, and that these issues are prioritized and addressed relative to risk and compliance during the acquisition integration or divestiture process.

Requirements or Expectations

Overall responsibility for compliance with this document is assigned to the Environment, Health, and Safety and Product Stewardship (EHS&PS) organization, in partnership with the Business Development Organization and the Global Occupational Medicine organization. Global EHS&PS and Occupational Medicine each appoint staff to conduct EHS&PS due diligence and integration. The staff coordinates site reviews and integration activities with the appropriate business, the Area EHS Manager, and Area Product Stewardship Leader, as needed.

EHS&PS integration of acquired operations and products is the responsibility of the Integration Manager assigned by the division or subsidiary. The Global EHS&PS Acquisition & Divestiture Team assists with identifying and prioritizing issues during acquisition integration, as well as site closures or transfers.

All pending acquisitions, mergers, divestitures, joint ventures and real estate transactions must be evaluated to identify EHS&PS risks and regulatory compliance matters. The evaluation must include but not be limited to operations, real estate, and products. Issues identified, and accompanying recommendations to address, must be communicated to the appropriate business and corporate management as early as feasible in the due diligence phase.



During the acquisition integration phase, further clarification of EHS&PS risks and compliance matters must be completed. Mitigation plans, prioritized relative to risk and compliance, must then be developed and implemented with the acquiring business.

In the case of divestitures, appropriate investigations must be conducted and, if necessary, a mitigation strategy must be developed and implemented with the divesting business prior to sale.