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# 3M Supplier Responsibility Code



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# Introduction

At 3M, we think holistically about how our people, products, and operations can all contribute to a brighter future. We understand that our sustainability and environmental, social, and governance (ESG) impact extends beyond our own operations, and we expect our suppliers to uphold the same standards we set for ourselves around environmental and social governance. We expect suppliers to meet our standards and be transparent about their related practices and to work with us to transform our shared value chain.

**The 3M Supplier Responsibility Code (“Code”) outlines 3M’s basic expectations for our suppliers in the areas of Labor, Health and Safety, Environment, Ethics, and Management Systems, is based on our corporate values for responsible and sustainable supply chains, aligns with the [10 Principles of the United Nations Global Compact](#) of which 3M is a signatory, and with the Responsible Business Alliance (RBA) 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 shall maintain compliance systems and be able to demonstrate a satisfactory record of compliance with laws and regulations in conducting their business. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with applicable regulations. 3M also requires suppliers to go beyond legal compliance, drawing upon internationally recognized standards to support our sustainability aspirations and advance social and environmental responsibility and business ethics.

This Code and all of its requirements applies to all 3M suppliers and 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 required 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 require our suppliers to communicate their conformance status to us when

requested and to make any necessary improvements to ensure full conformance. Suppliers shall support 3M or its designated 3rd party provider’s monitoring of performance against this Code as deemed necessary, including requesting specific performance information. We 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 require 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 and ESG of their operations, as well as the materials they provide to 3M, they may positively distinguish themselves from their competition. We expect 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. 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 [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 and our customers. 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.

# 3M





## A. Labor

In addition to full compliance with all applicable labor and human resource laws, we require our suppliers to uphold the human rights of workers and treat 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) Prohibition of Forced Labor

Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, military labor, involuntary or exploitative prison labor, trafficked or slave labor is not permitted. 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 a facility, nor any unreasonable restrictions on entering or exiting company-provided facilities, including, if applicable, workers' dormitories, living quarters, or restrooms. As part of the hiring process for workers entering the country specifically to work for the supplier, foreign migrant workers must be provided with a written employment agreement in their

native language, or in a language the worker can understand, that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement 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 after departure from the country of origin unless these changes are made to meet local law and provide equal or better terms. All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in the worker's contract, if applicable. Suppliers must maintain documentation on all leaving workers and follow documentation retention procedures that comply with applicable laws. Employers, as well as their agents and sub-agents, may not hold or otherwise destroy, conceal, or confiscate identity or

immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is necessary to comply with the local law. In this case, at no time may workers be denied reasonable access to their documents. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees in order to obtain employment. If any such fees are found to have been paid by a worker, such fees shall be repaid to the worker.

### 2) Young Workers

Suppliers must comply with the applicable local laws on the minimum hiring age for employees; provided, however, that in no case may a supplier hire or use the services of a worker younger than 15 years of age. Suppliers shall implement an appropriate mechanism to verify the age of workers. If it is determined that any worker is underage, employment must be terminated, and the Company's management should take appropriate remedial steps that include consideration of the child's best interest. Workers younger than 18 years of age ("Young Workers") shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through appropriate maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws 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

Working hours are not to exceed the maximum set by local law. Further, a workweek shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed

legally mandated breaks, holiday, and vacation days to which they are legally entitled, including time off when ill or for family and medical 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 and hour laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In addition to complying with minimum wage and other applicable legal requirements, suppliers should moreover work towards compensation that is competitive and fair. All workers shall receive equitable pay considering their work, qualification, and other job-related factors. If required by local law, workers shall be compensated 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 and in compliance with applicable law. For each pay period, suppliers shall provide workers with a timely and understandable wage statement in compliance with applicable law 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 and/or as agreed upon between the company and a Union or Works Council, if applicable.

#### 5) Non-Discrimination / Non-Harassment / Humane Treatment

Suppliers shall commit to a workplace free of harassment and unlawful discrimination.

Supplier shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected

genetic information, marital or family status, or any other legally protected characteristic as may be applicable, in all employment practices to include, but not limited to, hiring, wages, promotions, or terminations.

Workers shall be provided with reasonable accommodation for religious practices and disability as defined by applicable laws. In addition, workers or potential workers shall not be subjected to medical tests, including pregnancy or virginity tests, or physical exams, that are used in an unlawfully discriminatory way.

There shall be no harsh or inhumane treatment including disrespectful behavior, any violence, gender-based violence, sexual or other unlawful harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, 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 and shall include the process in which workers can report misconduct.

#### 6) Freedom of Association and Collective Bargaining

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. In alignment with these principles, 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. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

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 this Code 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 require our suppliers to be able to demonstrate that these expectations are being addressed. Individuals can ask a question or raise a concern at [3MEthics.com](#).

Recognized standards such as the Equal Employment Opportunity Commission (EEOC), Organization for Economic Cooperation and Development (OECD), [United Nations Guiding Principles on Labor and Human Rights](#), the [UN Global Compact Principles 1-6 on Human Rights and Labor](#), ILO Discrimination (Employment and Occupation) Convention (No.111) 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 mitigate health and safety issues in the workplace.

Our supplier health and safety standards are:

### 1) Occupational Health and Safety

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, excessive noise, fall hazards, etc.) shall be identified, assessed, and mitigated using the Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers shall be provided, free of charge, 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. Gender-responsive

measures shall be taken, such as not having pregnant women and nursing mothers in working conditions which could be hazardous to them or their child, and to provide reasonable accommodation for nursing mothers.

### 2) Emergency Preparedness

Suppliers shall 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. Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. At minimum emergency plans shall include appropriate fire detection and suppression equipment, including accessibility and maintenance of

fire extinguishers, adequate exit facilities, contact information for emergency responders, 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 shall be in place to prevent, manage, track and report occupational injuries and illnesses, 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 the return of

workers to work. Supplier shall allow workers to remove themselves from imminent harm and not return until the situation is mitigated, as well as allowing workers time to recover before returning to work, without fear of retaliation.

#### **4) Industrial Hygiene**

Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Supplier shall provide workers with safe and healthy working environments which shall be maintained through ongoing, systematic monitoring of workers' health and working environments. Suppliers shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and 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 shall be identified, evaluated and controlled.

#### **6) Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.

#### **7) Sanitation, Food, and Housing**

Workers shall be provided with ready access to clean toilet facilities, potable water, and sanitary

food preparation, storage, and eating facilities (canteen). Worker dormitories provided by the supplier or a labor agent shall be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, adequate conditioned 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**

Suppliers 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. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns without retaliation.

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. [Contact us](#) anytime to discuss how we can work together to make safer workplaces everywhere.

Recognized management systems such as [ISO 45001](#) and [ILO Guidelines on Occupational Safety and Health](#) may be useful sources of additional information.



## C. Environment

3M recognizes that environmental responsibility is integral to producing world-class products. In addition to full compliance with all applicable environmental laws, suppliers shall integrate environmental responsibility into their operations. Suppliers shall identify actual and potential environmental impacts and 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 shall be obtained, maintained and kept current, and the supplier must comply with operational and reporting requirements.

### 2) Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans, or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

Hazardous waste data shall be tracked and documented.

### 3) Solid Waste

Suppliers shall implement a systematic approach to identify, manage, reduce, recycle, and responsibly dispose of non-hazardous solid waste. Waste data shall be tracked and documented.

### 4) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances and combustion byproducts generated from operations shall be characterized, routinely monitored, controlled and treated, as required, prior

to discharge. Ozone-depleting substances shall be effectively managed in accordance with the Montreal Protocol and applicable regulations. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

### 5) Materials Restrictions

Suppliers shall adhere to all applicable laws, regulations, and 3M requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal. Suppliers must provide to 3M detailed reports, including full composition, regulatory information, and material certifications. This information is needed for 3M to perform required legal and regulatory analysis on the materials, and to meet 3M internal product stewardship and chemicals management policies.

### 6) Water Management

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge, and controls channels of contamination. All wastewaters shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers 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

Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and reported. Suppliers shall establish and report against an absolute corporate-wide greenhouse gas reduction goal and implement methods to improve energy efficiency and minimize

energy consumption and greenhouse gas emissions.

## 8) Pollution Prevention and Resource Conservation

Emissions and discharges of pollutants and generation of waste shall 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 etc., shall be conserved by practices supporting a circular economy. This may be accomplished by modification of production, maintenance, and facility processes, materials substitution, re-use, conservation, recycling, or other legal means.

## 9) Transportation

Suppliers shall comply with all applicable laws governing the transportation of goods and materials. If handling Dangerous Goods\* suppliers are expected to be trained in and shall comply with applicable transportation regulations for air, ocean, or land cargo. Suppliers should implement transportation programs that reduce pollution and improve energy efficient practices. \*Hazardous material/dangerous goods 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) Responsible Sourcing of Renewable Materials

Suppliers shall only provide forest-based products and materials to 3M that are legally harvested/extracted, sourced, transported, and exported from their country of origin. Suppliers shall adopt policies and

management systems that comply with applicable global regulations and meet the requirements of the [3M Forest Products Sourcing Policy](#), and develop methods to require their suppliers to do the same. This includes maintaining and providing to 3M upon request information regarding the full traceability of the supply chain back to the source of the harvest/extraction, including data on geolocation of all land plots where commodities are harvested/produced, identification of the mill(s) and third-party certifications of materials and operations in their supply chain.

## 11) Responsible Sourcing of Minerals

Suppliers shall adopt policies and due diligence management systems for sourcing products and materials that contain minerals of concern including tantalum, tin, tungsten, gold, cobalt, mica and other higher-risk minerals. This includes chain of custody to the source of extraction to reasonably assure that minerals are sourced consistent with recognized due diligence frameworks such as the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas, and in accordance with the [3M Responsible Minerals Sourcing Policy](#).

Global environmental challenges like climate change, water quality and scarcity, and energy availability affects all businesses and every person on the planet. 3M is doing its part through our [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 [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 shall uphold the highest standards of ethics.

Our supplier ethics standards are:

### 1) Business Integrity

The highest standards of integrity shall 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 shall be transparently performed and accurately reflected in 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, the United States Foreign Corrupt Practices Act, and the Brazil Clean Company Act. Suppliers must 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 shall not 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 in 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, and 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 shall be upheld.

#### 8) Reporting, Protection of Identity and Non-Retaliation

Supplier shall have adequate programs to address employee concerns and grievances. Those programs shall be communicated, protect confidentiality, allow anonymity of raising concerns or reporting unless prohibited by law, and protect employees against retaliation.

#### 9) Privacy

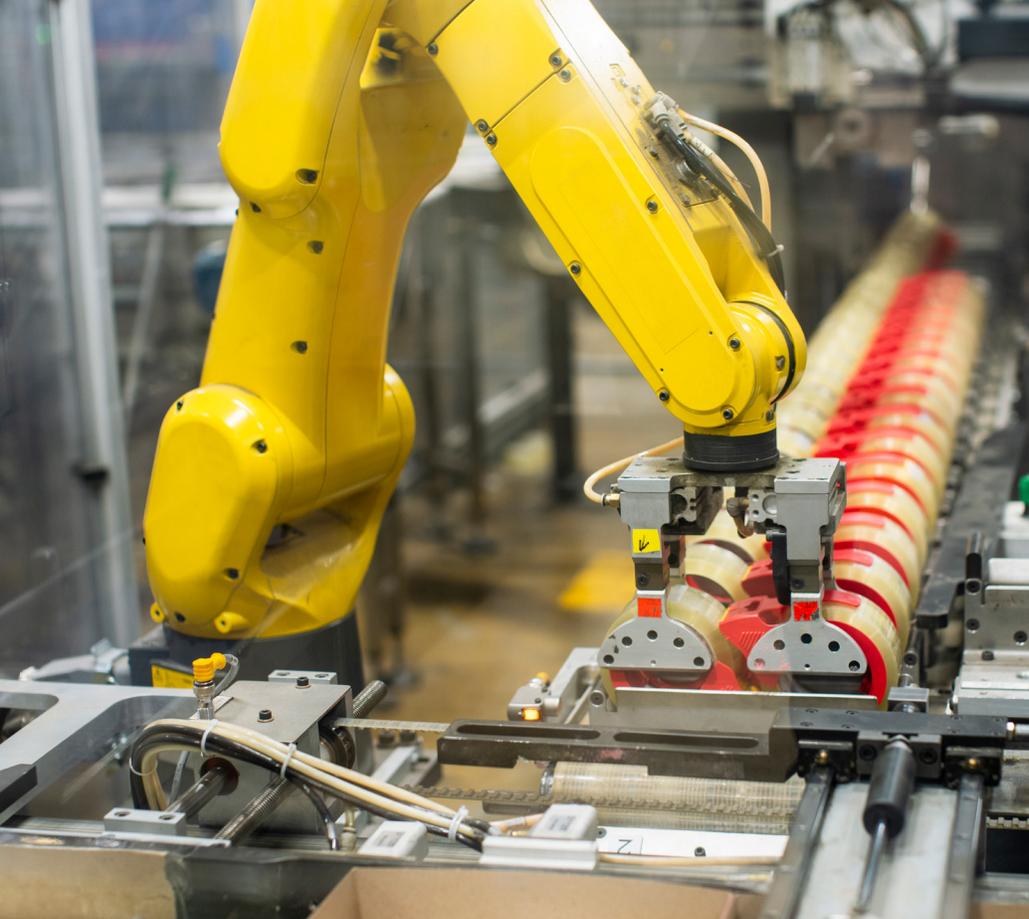
Supplier shall protect the personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted,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

#### 10) Artificial Intelligence (AI)

Supplier shall be transparent regarding its use of AI, including the data it collects, processes, uses, or retains, the AI tools or models it employs, and the outputs and uses of those AI tools. Supplier shall comply with applicable laws and regulatory requirements as well as the applicable 3M standards in this 3M Supplier Responsibility Code, in its use of AI and shall utilize AI for supply of any material or service to or on behalf of 3M only with prior written agreement from 3M.

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 shall adopt or establish a management system 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 shall contain the following elements:

### 1) Company Commitment

Human rights, health and safety, environmental and ethics policy statements affirming the supplier's commitment to due diligence and continuous improvement, endorsed by executive management. Policy statements shall be made public and communicated to the workers in a language they understand via accessible channels.

### 2) Management Accountability and Responsibility

Supplier shall clearly identify 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 systems 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, track, and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

## 4) Risk Assessment and Risk Management

A process to identify the legal, compliance, environmental, health and safety, labor practice and ethics risks including the risks of negative human rights and environmental impacts, associated with supplier's operations. Supplier shall determine the relative significance for each risk, develop appropriate procedures and implement controls to manage the identified risks and ensure regulatory compliance and conformance to this Code. Supplier shall notify 3M of any changes to the supply chain including manufacturing sites, sources of supply, and materials.

## 5) Improvement Objectives

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

## 6) Training

Training programs to implement supplier's policies, procedures, and improvement objectives and to meet applicable laws and requirements of this Code. Training shall be provided to all new employees, a program for ongoing training to ensure employees remain up to date with relevant information and skills, as well as specific targeted training for managers.

## 7) Communication

Supplier shall establish a process for communicating clear and accurate information about supplier's policies, practices, expectations, and performance to workers, suppliers, and customers.

## 8) Worker/Stakeholder Engagement and Access to Remedy

Supplier shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code to aide with conformance and foster continuous improvement. Employees/workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

## 9) Audits and Assessments

Supplier shall conduct an ESG assessment at least every two years. The objective of the assessment is to ensure conformance to legal and regulatory requirements and the content of this Code, including customer contractual requirements related to social, environmental, health and safety, and ethics responsibility. Supplier shall perform such self-evaluation no less frequently than once every two years. 3M reserves the right to assess the supplier's facilities through remote or onsite audits. This may include a 3M led audit, and/or 3M approved 3rd party led audit, as well as requiring supplier complete and submit a relevant self-assessment. Supplier must cooperate and make resources/facilities available. 3M requires full transparency during the audit process, i.e., accurate and honest disclosure of all documentation and information. Any and all forms of bribery, corruption, deception and falsification of records are strictly prohibited.

## 10) Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments or audits, inspections, investigations, and reviews. The corrections shall be documented in an action plan that demonstrates how the deficiency was corrected and when, adequate plan

for sustaining the improvements, and person(s) responsible for monitoring. A follow-up remote assessment or onsite audit may be conducted by 3M or a 3M representative to verify that the deficiencies were corrected, and action plans are being sustained.

## 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. Documentation includes, but is not limited to licenses, permits, certifications, policies and procedures, and Employee and Facility records. The necessary documentation shall be maintained and made available upon request by 3M or 3M appointed representatives. This requirement also applies to any third-party employment agencies used by the Facility.

## 12) Supplier Responsibility

A process to communicate the 3M Supplier Responsibility Code requirements to upstream tier suppliers and to require suppliers to adopt management systems and practices for conformance 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](#) are useful sources to support building, implementing, and maintaining strong management systems.

Questions? Refer to the [Supplier Resources page](#) on 3M.com.

At 3M, we encourage all employees and people who interact with 3M to report suspected misconduct or ask a compliance question and speak up at [3MEthics.com](#). Those who report a concern can be confident that they will not be subject to retaliation. In most countries, you may use this system to report your concerns anonymously.

