

Conflict Minerals Policy

Applies To

This policy applies to the selection and retention of all 3M direct (or “tier one”) suppliers that provide materials that contain tin, tantalum, tungsten and/or gold.

Introduction and Background or Purpose

Armed groups operating in the eastern Democratic Republic of the Congo (DRC) have engaged in conflict and severe human rights abuses, fueled through proceeds from the mining or trade of so-called “conflict minerals” or 3TGs (tin, tantalum, tungsten and gold). These atrocities led to the creation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, built on the framework of the UN Guiding Principles on Business and Human Rights. Legal requirements have followed, requiring certain companies to disclose their due diligence consistent with the OECD Guidance, mitigating the risk that the 3TGs they purchase may directly or indirectly fund conflict in the DRC, adjoining countries, or other high-risk areas of the world. At the same time, companies are expected to source responsibly from these areas to avoid a de facto embargo, which can have significant adverse impacts or unintended consequences for artisanal miners and their families whose livelihood depends on the mining industry.

3M deplores the violence and inhumane treatment in the DRC, adjoining countries and other parts of the world. By adopting this Policy and collaborating with our customers and suppliers, especially through the Conflict-Free Sourcing Initiative (CFSI), 3M is working with others to promote responsible business practices and foster peace and prosperity, which is consistent with 3M values.

Requirements or Expectations

3M is committed to responsible sourcing of 3TGs using the OECD due diligence framework, so as not to support conflict or human rights abuses in the DRC region or other areas of the world, while avoiding de facto embargoes. This position is consistent with 3M’s Human Rights Policy and 3M’s respect for human rights in our own operations and our supply chains, as well as with the OECD Due Diligence Guidance and UN Guiding Principles.

3M expects its suppliers to:

- Supply materials to 3M that are “Conflict-Free,” meaning 3TGs that are from recycled or scrap sources or that do not directly or indirectly finance armed groups through mining or mineral trading 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 CFSI (“high-risk areas”). We encourage suppliers to responsibly source from the DRC, adjoining countries and high-risk areas, in order to avoid de facto embargoes.
- Adopt policies and due diligence management systems to identify, prevent, mitigate and, where appropriate, remediate risks associated with 3TGs as well as require their suppliers to adopt similar policies and practices.
- Provide 3M information on the presence of 3TGs in their products and information on the smelters and refiners in their respective supply chains, consistent with the industry standard Conflict Mineral Reporting Template (CMRT) as developed by CFSI.
- Procure, directly or indirectly, from smelters and refiners validated under the Conflict-Free Smelter (CFS) Program of CFSI or other recognized third party validation programs (for suppliers whose sourcing originates from the DRC, adjoining countries or high-risk areas).
- Suspend or discontinue engagement with up-stream suppliers after failed attempts at mitigation or remediation.
- Collaborate with others on cross-industry efforts, such as with CFSI, to support responsible and conflict-free 3TG supply chains, including on-going education and training.

Related Information

3M Code of Conduct

3M.com/sustainability

3M Human Rights Policy

3M Supplier Responsibility Code