INTRODUCTION

This Conflict Minerals Report (this “Report”) for 3M Company (“3M”, “Company,” “we,” “our”) is provided in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 for the reporting period from January 1 to December 31, 2020.

“Conflict Minerals” are defined by the Securities and Exchange Commission (“SEC”) as cassiterite, columbite-tantalite, wolframite and gold, and their derivatives, which are limited to tin, tantalum and tungsten (collectively “3TG”). As a result of the Company’s reasonable country of origin inquiry (“RCOI”) for the period from January 1 to December 31, 2020 described in the attached Specialized Disclosure Report (“Form SD”), 3M has reason to believe that a portion of the 3TG necessary to the functionality or production of products (“Necessary 3TG”) that we manufactured or contracted to manufacture during the period from January 1 to December 31, 2020 may have originated in the Democratic Republic of Congo (“DRC”), the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola (together, the “Covered Countries”) and those Necessary 3TG may not be from recycled or scrap sources.

3M has actively engaged with its customers and suppliers for several years with respect to the use of Conflict Minerals. 3M adopted a Conflict Minerals Policy in 2011, renamed to Responsible Minerals Sourcing Policy in 2019, articulating the Conflict Minerals supply chain due diligence process and 3M’s commitments to reporting obligations regarding Conflict Minerals. The Policy (as defined below) is available on 3M’s Supplier Direct website (https://www.3m.com/3M/en_US/suppliers-direct/).

3M has contributed to industry efforts to address Conflict Minerals through serving as a member of the Responsible Business Alliance (“RBA”) and the Responsible Minerals Initiative (“RMI”). This engagement and the contributions made have helped develop standards, best practices, and tools that benefit all companies working to end the association between 3TG and conflict in the Covered Countries.

REASONABLE COUNTRY OF ORIGIN INQUIRY

Many essential products in the 3M businesses, such as electronics, personal safety or transportation, rely on 3TG. The following are examples of product families that often include 3TG:

- Electrical connectors, cables and cords, electronic chargers, controls, monitors and plated circuitry
- Products that include these and other electrical or electronic components
- Metallized films and tapes
- Some orthodontic products
- Fall protection equipment
- Fire safety equipment

3M therefore conducted due diligence on the source and chain of custody of Necessary 3TG, as described below, using the following due diligence management system: To determine whether Necessary 3TG in products originated in Covered Countries, 3M retained a third-party service provider (“Provider”) to assist us in reviewing the supply chain and identifying risks. 3M provided a list composed of suppliers and parts associated with the in-scope products to the Provider for upload to its database to assist with RCOI of potential product families, such as those noted above.

To collect data on the materials’ sources of origin procured by the supply chain, 3M utilized RMI’s Conflict Minerals Reporting Template (“CMRT”) version 6.01 to conduct a survey of all in-scope suppliers.

During the supplier survey, 3M contacted suppliers via the Provider’s software-as-a-service (SaaS) platform, which enables users to complete and track supplier communications and allows suppliers to upload completed CMRTs directly to the platform for validation, assessment and management. The database also provides functionality that meets the OECD Guidance (as defined below) process expectations by evaluating the quality of each supplier response and assigning a health score based on the supplier’s declaration of process engagement. Additionally, the metrics provided in this Report, as well as the step-by-step process for supplier engagement and upstream due diligence investigations performed, are managed through this platform.
Via the database and Provider, 3M requested that all suppliers complete a CMRT. Training and education to guide suppliers on best practices and the use of this template was included. The Provider monitored and tracked all communications in the database for future reporting and transparency. 3M directly contacted suppliers that were unresponsive to the Provider’s communications during the diligence process and requested these suppliers complete the CMRT and submit it to the Provider.

3M’s program included automated data validation on all submitted CMRTs. The goal of data validation is to increase the accuracy of submissions and identify any contradictory answers in the CMRT. This data validation is based on questions within the declaration tab of the CMRT, which helps to identify areas that require further classification or risk assessment, as well as understand the due diligence efforts of the Tier 1 suppliers. The results of this data validation contribute to the program’s health assessment and are shared with the suppliers to ensure they understand areas that require clarification or improvement.

All submitted forms were accepted and classified as valid or invalid, so that data is retained. Examples of invalid submissions may include incomplete, inaccurate, or inconsistent data. Further due diligence is implemented with suppliers providing invalid forms, who are requested to submit a valid form. Suppliers were also provided with guidance on how to correct these validation errors in the form of feedback on their CMRT submission, training courses and direct engagement help through the Provider’s multilingual Supplier Experience team.

Based on the findings through the RCOI process, 3M was able to determine the countries of origin for a large portion of the 3TG in its products. As such, 3M continued to perform further due diligence on the source and chain of custody of the minerals in question.

DUE DILIGENCE MEASURES

A. Design of 3M’s Due Diligence Measures

3M’s Conflict Minerals due diligence management system has been designed to conform in all material respects with the Organisation for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”), as applicable for 3TG and downstream companies (as the term “downstream companies” is defined in the OECD Guidance).

B. Due Diligence Performed

1. Establish Strong Company Management Systems

Responsible Minerals (Conflict Minerals) Sourcing Policy

3M first adopted a Conflict Minerals Policy in 2011. The Conflict Minerals Policy was updated in 2019 and renamed to Responsible Minerals Sourcing Policy (“Policy”) to include 3TG and cobalt and is available on 3M’s Supplier Direct website (https://www.3m.com/3M/en_US/suppliers-direct/), along with other information on 3M’s Responsible Minerals program.

3M is committed to responsible sourcing of 3TG and cobalt using the OECD due diligence framework, so as not to support conflict or human rights abuses in the Covered Countries or Conflict-Affected and High-Risk Areas (“CAHRAs”), while avoiding de facto embargoes. This position is consistent with 3M’s Human Rights Policy (http://multimedia.3m.com/mws/media/1029705O/human-rights-policy.pdf) and 3M’s respect for human rights in our own operations and our supply chains, as well as with the OECD Guidance and United Nations Guiding Principles on Business and Human Rights (the “UN Principles”).

Internal Management System

3M has established a management system to support the effective and efficient execution of our Responsible Minerals program. 3M’s management system includes an executive sponsor: 3M’s Group President, Enterprise Operations. In addition, 3M has designated a cross-functional Responsible Minerals Steering Team (“Steering Team”), composed of representatives from Strategic Sourcing, Area Responsible Sourcing Leaders, Environment, Health & Safety and 3M Legal Affairs. The Steering Team has responsibility for developing and implementing 3M’s Policy and compliance strategy, as well as reviewing the progress, effectiveness and continual improvement of the program. The Steering Team is led by a Responsible Minerals Program Manager (“Program Manager”) from 3M Strategic Sourcing.

Senior leadership of Strategic Sourcing, Finance, Corporate Audit, Compliance and Business Conduct, and Human Resources is briefed bi-annually about the results of our due diligence efforts, including evaluation of risks and risk mitigation measures. These briefings also include an evaluation of the progress, effectiveness and execution of our
Policy and Responsible Minerals program.

3M’s Provider assisted with evaluating supply chain information regarding 3TG and identifying potential risks, and in the development and implementation of additional due diligence steps that 3M will undertake with suppliers with regard to Conflict Minerals.

3M leveraged the Provider’s managed service team, which was made up of dedicated program specialists who supported 3M’s Conflict Minerals program. 3M communicated regularly with the Provider in order to receive updates on program status. Each member of the Provider’s team is trained in Conflict Minerals compliance and understands the intricacies of the CMRT and Conflict Minerals reporting, as well as Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”).

Control System and Supply Chain Transparency

3M’s Supplier Responsibility Code (“SRC”) (https://www.3m.com/3M/en_US/suppliers-direct/supplier-requirements/global-supplier-responsibility-code/) applies to all suppliers and outlines 3M’s foundational expectations as it relates to labor, ethics, environment, health and safety, as well as management systems. This code of conduct is based on industry and internationally-accepted principles, such as the UN Principles and the OECD Guidance. If a supplier does not meet 3M’s requirements, the situation is escalated and evaluated for disposition.

3M’s global suppliers are expected to supply materials to 3M that are “Conflict-Free,” meaning minerals that are from recycled or scrap sources or that do not directly or indirectly finance armed groups through mining or mineral trading in the DRC, adjoining countries or any other CAHRAs, as determined by regulatory bodies and as applied by RMI. This expectation is communicated in 3M contract agreement templates and U.S. purchase order terms and conditions. 3M relies on direct suppliers to provide information on the origin of the 3TG contained in components and materials supplied, including sources of 3TG that are supplied to them from lower-tier suppliers.

3M is a member of RMI, which provides strong industry collaboration and greater visibility to supply chain risks. 3M gathered information on the use of 3TG by the Supplier Group (as defined below) using RMI’s CMRT. 3M engaged the Provider to assist with Supplier Group outreach and engagement and with data collection and validation. 3M used the Provider’s web portal to determine the chain of custody of the Necessary 3TG included in our products, with a focus on identifying smelters or refiners (“SORs”) in their respective supply chains.

Supplier Engagement

3M identified relevant suppliers that supply products that may contain Necessary 3TG. 3M has determined that a reasonably designed inquiry for identifying and assessing supply chain risks should focus on higher priority suppliers consistent with RMI’s Five Practical Steps to Support SEC Conflict Minerals Disclosure. 3M identified the relevant higher priority suppliers (“Supplier Group”) by prioritizing its review of products that may contain Necessary 3TG, and the corresponding supply chains, accounting for various factors, such as estimated content of Necessary 3TG, type of mineral, amount of spend, the nature of the supply chain, and supplier location. In 2020 3M conducted outreach with suppliers for products that may contain Necessary 3TG, which represented 60% of the in-scope Supplier Group.

3M’s Provider reviewed the Supplier Group CMRT responses to determine where further engagement with suppliers was warranted. Those responses were then escalated to 3M for additional due diligence and follow-up. 3M considered untimely or incomplete responses, as well as inconsistencies with the data reported in the CMRT, in making this determination. For any CMRT that was determined invalid based on this review, the Provider’s platform automatically sent the supplier an email outlining any validation issues with the CMRT question logic or missing fields. 3M’s Provider proactively engaged suppliers to educate them on the validity requirements, how to enter CMRT data, and/or 3M’s expectation on CMRT information, as appropriate. Suppliers were educated on 3M’s Provider’s supplier portal links, which provides training resources, reporting templates, practical tips, and best practices.

3M established controls and transparency by creating a process in coordination with the Provider to engage relevant suppliers to identify SORs contained in 3M’s supply chain. 3M communicated expectations to these relevant suppliers in connection with our inquiry requesting they send a similar request to their direct suppliers to obtain the information successively upstream to the SOR. A Provider web portal was utilized for the collection of CMRTs. Suppliers were provided a link to 3M’s Supplier Direct website (https://www.3m.com/3M/en_US/suppliers-direct/), where we communicate supplier responsibility expectations and have links to our Supplier Learning Academy, which includes links to training resources, practical tips, and best practices. 3M encourages all suppliers to have a proactive approach in aligning with 3M’s policies and programs to strengthen our supply chain to ensure conformance to regulations. Because 3M believes in developing strong and sustainable relationships, it is important our business partners understand 3M’s commitment to doing business ethically and in compliance with the law.
For suppliers that identified “SORs of Interest” in their CMRT responses, according to indicators defined in the OECD Guidance, 3M and its Provider requested additional information and/or Conflict Minerals due diligence standards and processes, conducting further due diligence about the “SORs of Interest.” In addition, these suppliers were provided a link to educational courses on smelter risk mitigation.

3M’s requirements related to responsible minerals in relevant global contract templates and U.S. purchase order terms and conditions require suppliers to comply with applicable laws and our policies on responsible minerals. This includes participation in a supply chain survey and related due diligence activities, and the provision, upon request, of information on SORs in relevant supply chains and other information 3M might require.

3M’s Policy expects suppliers to responsibly source 3TG and cobalt through SORs that comply with recognized assurance programs, including RMI, the London Bullion Market Association (“LBMA”), and the Responsible Jewellery Council (“RJC”). For SORs identified by the Supplier Group not currently engaged in an assurance program, 3M and its Provider sent letters to those SORs encouraging them to participate. 3M also encouraged its Supplier Group and, in certain cases, customers to reach out to those SORs and encourage their participation. In addition, communications were sent to those SORs in our supply chain who were conformant but had not been designated as progressing or as having a re-audit in progress within three months of their conformance date.

3M also encourages suppliers to draw upon internationally recognized standards to advance social and environmental responsibility and business ethics. All existing and future suppliers are required to conform to 3M’s SRC, demonstrating their commitment to share 3M’s values on social and environmentally sustainable operations and practices, which include labor, ethics, environment, health and safety, as well as management systems. The SRC is based upon the RBA framework. 3M uses several external indices, such as the International Labour Organization, Global Slavery Index, and the Corruption Perception Index, to assist with prioritization of higher risk suppliers.

In partnership with 3M’s Provider, 3M has put a strong emphasis on supplier education and training. This includes guiding suppliers to online resources, including access to interactive training courses, informational and best practice documents and real time chat with compliance specialists.

**Grievance Mechanism**

3M has a grievance mechanism whereby employees and suppliers can report concerns regarding 3M’s business conduct and other matters, at 3M-ethics.com (https://secure.ethicspoint.com/domain/media/en/gui/8897/index.html). 3M also has procedures in place for follow-up in the event any responsible minerals issues are raised through our grievance mechanism.

SORs and other external stakeholders also may use RMI’s Grievance and Complaints Mechanism (“RMI Mechanism”). The RMI Mechanism allows stakeholders to raise concerns about the RMI Responsible Minerals Assurance Process (“RMAP”) audit process, protocols, and SOR operations that fall within the scope of the RMAP, audit quality, and auditor competencies, mineral supply chains and upstream/downstream initiatives, as well as mineral sourcing activities and due diligence of RMI member companies.

**Maintain Records**

3M has a record retention policy applicable to Conflict Minerals-related documentation that provides for retention for a minimum of ten years. 3M’s Provider’s document retention policy includes 3M Conflict Minerals-related documents, including supplier responses to CMRTs as well as the sources identified within each reporting period.

**2. Identify and Assess Risk in the Supply Chain**

As part of the process of identifying and assessing risks in the supply chain, 3M asked the Supplier Group to share information about the Necessary 3TG in their products provided to 3M based on responses to the industry standard RMI CMRT. 3M deployed the CMRT to the Supplier Group through the Provider’s supplier’s web portal. That system issued three automatic follow-up reminders to those in the Supplier Group who had not responded to the information requested. Additional direct mail reminders were sent to those in the Supplier Group who had not responded, and follow-up phone calls were made with prioritized suppliers. As part of these phone calls, 3M offered training to the supplier on topics including the importance of the information requested by 3M, the disclosure requirements of the Dodd-Frank Act Conflict Minerals legislation, and how to submit the CMRT into 3M’s Provider’s web portal. In addition, follow-up reminders were sent as an escalation to those in the Supplier Group who had discrepancies in their CMRTs. Outbound communications were conducted in native languages, such as English, German, simplified Chinese, French, Italian, Spanish, Portuguese, and Japanese, to best collaborate with suppliers to ensure expectations were understood. If supplier responses indicated that Necessary 3TG contained in products provided to 3M may have originated from the Covered
Countries, had unknown sourcing, or may have been processed by SORs that have not been validated as using DRC conflict-free sourcing practices, then such responses were escalated to the Steering Team for further review and determination of follow-up steps.

3M does not have a direct relationship with SORs and does not perform direct audits of these entities within the supply chain. Smelters that have completed an RMAP audit are considered to be DRC conflict-free. In cases where the smelter’s due diligence practices have not been audited against the RMAP standard or they are considered non-conformant by RMAP, follow-ups are made to suppliers reporting those facilities. Smelters are then assessed for the potential for sourcing risk.

Each facility that meets the definition of a smelter or refiner of a 3TG mineral is assessed according to “SORs of Interest” indicators defined in the OECD Guidance. The Provider uses numerous factors to determine the level of risk that each smelter poses to the supply chain by identifying “SORs of Interest.” These factors include:

- Geographic proximity to the DRC and other Covered Countries.
- Known mineral source country of origin.
- RMAP audit status.
- Credible evidence of unethical or conflict sourcing.
- Peer assessments conducted by credible third-party sources.

Suppliers are also evaluated on program strength, which assists in making key risk mitigation decisions as the program progresses. The criteria used to evaluate the strength of the program is based on certain questions in the CMRT related to the suppliers’ Conflict Minerals practices and policies.

3M verified SORs using RMI’s Conformant Smelters and Refiners list. 3M also referred to other sources of information, including publications of the LBMA and the RJC, to validate and assess potential risks.

3. Design and Implement a Strategy to Respond to Identified Risks

3M has designed and implemented a strategy to respond to risks. The Program Manager works with the Steering Team and its executive sponsor, providing periodic updates or escalating issues to relevant executives of any findings where a supplier in the Supplier Group identifies a SOR processing Necessary 3TG for 3M products that sources from or may source from the Covered Countries.

The Provider’s risk mitigation activities are initiated whenever a supplier’s CMRT reported facilities of concern. Through the Provider, suppliers with submissions that included any smelters of interest were immediately given feedback instructing the supplier to take its own independent risk mitigation actions. Examples include the submission of a product-specific CMRT to better identify the connection to products that it supplies to 3M. Additional escalation may have been necessary to address any continued sourcing from these smelters of interest. Suppliers are given clear performance objectives within reasonable timeframes, with the ultimate goal of progressive elimination of these smelters of interest from the supply chain. In addition, suppliers are guided to the educational materials, located on the Provider’s website, on mitigating the risks identified through the data collection process.

If additional escalation is required, the Program Manager works with the Steering Team and its executive sponsor, or other relevant executives, to determine appropriate follow-up actions, if any, to mitigate risks. Follow-up actions based upon the variety of supplier risk levels may include additional due diligence by the Steering Team. 3M and its Provider may communicate directly with its suppliers that have not yet been determined to be conformant with RMAP in order to request sourcing information and encourage their involvement with the RMI Program. As part of the due diligence activities, 3M may decide to find alternate sources of supply and/or suspend or terminate existing supplier relationships after failed attempts at mitigation or remediation. For the year 2020, 3M found no instances where it was necessary to find replacement sources of supply or to suspend or terminate a supplier relationship. However, increased due diligence was applied and continues to be applied to those smelters of interest.

4. Carry out Independent Third-Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

3M utilized information provided by the independent third-party audits of SORs through RMAP, LBMA and the RJC to determine whether any Necessary 3TG sourced from the Covered Countries is validated as “Conflict-Free” using RMI’s RCOI data. In addition, members of the Steering Team participate in RMI’s Due Diligence Practices Team and Plenary Team, which keeps 3M informed of new auditing standards, emerging risks, and risk assessment methods.

3M’s Provider directly contacted SORs that are not currently enrolled in the RMAP to encourage their participation and gather information regarding each facility’s sourcing practices on behalf of its compliance partners. 3M is a signatory of
this communication in accordance with the requirements of downstream companies detailed in the OECD Guidance.

Through 3M’s membership with the RMI, SORs have been encouraged to participate in the RMAP. Any SORs that were reported by suppliers who were not part of the RMAP were also contacted directly by 3M’s Provider to encourage them to participate in the RMAP.

5. Report on Supply Chain Due Diligence

3M has published the Form SD and Conflict Minerals Report for the year ended December 31, 2020. These reports are publicly available within the Responsible Minerals section of 3M’s Supplier Direct website (https://www.3m.com/3M/en_US/suppliers-direct/). The reference to 3M’s website is provided for convenience only, and its contents are neither incorporated by reference into this Report and Form SD nor deemed filed with the SEC.

RESULTS OF DUE DILIGENCE

Based on our RCOI described in our Form SD and the other aspects of our due diligence program described above, 3M evaluated the Supplier Group responses to the CMRT-based supplier inquiry. As a result of the RCOI activity, 3M has reason to believe that a portion of its Necessary 3TG may have originated in the Covered Countries and those Necessary 3TG may not be from recycled or scrap sources. However, after conducting further due diligence, 3M determined that based on information provided by the Supplier Group and information available to 3M as a member of RMI, the 25 SORs identified as sourcing from those Covered Countries have been validated as conformant to RMAP protocols.

As outlined in the OECD Guidance, the internationally-recognized standard on which 3M’s system is based, 3M supports RMI’s RMAP process that audits SORs’ due diligence activities. The source of information for certain statements in this declaration was obtained through our membership in RMI, using the RCOI report for member “mmmco.”

Supply Chain Outreach Results

Supply chain outreach is required to identify the upstream sources of origin of tin, tantalum, tungsten and gold. Following the industry standard process, CMRTs were sent to and requested from Tier 1 suppliers, who are expected to follow this process until the SOI sources are identified. In 2020, 3M received over 90% response rate from its suppliers as a result of outreach efforts and will continue to work with the remaining suppliers to obtain future alignment with requests.

Upstream Data Transparency

All SORs listed by suppliers in completed CMRTs, which appear on the RMI-maintained smelters list, are attached in Annex I. As is a common practice when requests are sent upstream in the supply chain, those who purchase materials from smelters may not be able to discern exactly which company’s product lines the materials may end up in. As a result, those providing the SORs have the practice to list all SORs they may purchase from within the reporting period. Therefore, the SORs (as sources) listed in Annex I are likely to be more comprehensive than the list of SORs which actually processed the 3TG contained in 3M’s products.

Suppliers that identified these specific smelters of interest on their CMRT were contacted in accordance with the OECD Guidance to inform them of the potential for risk, and to evaluate whether or not these smelters could be connected to 3M’s products. The suppliers were asked to complete a user-defined or product-level CMRT specific to the materials, products or piece parts purchased by 3M, rather than a company-level CMRT, to better identify the connection to products that they supply to 3M. Other suppliers were evaluated internally to determine if they were in fact still active suppliers. If not, they were removed from the scope of data collection.

Countries of Origin

Annex II includes an aggregated list of countries of origin from which the reported facilities collectively source 3TG, based on information provided through the CMRT data collection process, from direct smelter outreach and the RMAP. As mentioned in the above section, it is understood that many responses may provide company-level data, or more data than can be directly linked to products sold by 3M; therefore, Annex II may contain countries from which 3M’s products are not sourced.

Information on Smelters or Refiners

The CMRT requested the Supplier Group and its suppliers provide 3M with information on the SORs providing Necessary 3TG to 3M. Because 3M typically does not have a direct relationship with the facilities used to process 3TG, 3M relies on information provided by the Supplier Group. Some suppliers in the Supplier Group provided information on all SORs
used by the supplier but could not provide information linking specific SORs used to process Necessary 3TG in products supplied to 3M. 3M verified 331 unique SOR names among these mentions, based on information listed on the RMI website. Of these unique SORs, 238 (72%) are validated as conformant to the RMAP process as of April 13, 2021, and 22 (7%) are reported as active by RMI, meaning they are engaged in the RMAP program but not yet conformant as of April 13, 2021. 3M’s Supplier Group identified 93% of the total number of conformant SORs listed on RMI’s website in their supply chains. Based on our involvement in the RMI Due Diligence Practices Team, as well as resources available to us through our membership in RMI, 3M believes the number of SORs conformant to RMAP process is attributable in part to industry collaborative efforts through RMI and other third-party validation programs.

3M monitored and tracked SORs identified as not having received a “Conflict-Free” designation or not having begun participating in an independent third-party assurance process. During this reporting year, 3M identified 59 (18%) SOR facilities that were not participating in an independent third-party assurance process. These facilities received letters from 3M encouraging their participation.

![Conflict Minerals supply chain traceability](image)

**Efforts to Determine the Country of Origin or Mine of Origin**

In order to determine country or mine of origin, 3M: (a) seeks information about 3TG SORs in our supply chain through use of the CMRT questions; and (b) utilizes information from the RMAP and its independent audits of SORs, as well as information from that effort made available by RMI publicly and to its members. 3M’s Supplier Group did not provide information on mines of origin for Necessary 3TG used in 3M products manufactured during 2020. 3M does not have sufficient information to conclusively determine the mines or the countries of origin of the Necessary 3TG in its products or whether the Necessary 3TG are from recycled or scrap sources. However, based on SOR information provided by the Supplier Group through the CMRT responses, as well as RMI information available to its members, the countries of origin of 3TG associated with SORs identified to 3M by the Supplier Group are believed to include the countries listed in Annex II below. While some countries listed in Annex II are Covered Countries, 3M validated that 25 SORs identified as sourcing from those Covered Countries are conformant to RMAP.

**Additional Due Diligence**

3M compared the overall set of SORs identified by the Supplier Group against RMI’s RCOI list dated April 13, 2021, to identify all names and mineral sourcing for SORs that are conformant with the RMAP protocols and have been validated by a third-party auditor. The RCOI list also identified SORs participating in other assurance programs where the mineral sourcing of SORs is not disclosed.

For the 59 SORs identified to 3M by the Supplier Group in 2020 that are not yet engaged in the RMAP as active or validated as conformant to RMAP or by any other independent third-party programs, 3M conducted further due diligence to confirm whether the SORs of interest processed Necessary 3TG used in products provided to 3M. In addition, 3M conducted due diligence through other means using a variety of information sources from RMI and others searching for evidence of SORs sourcing from the Covered Countries or potentially contributing to conflict in the Covered Countries. Such additional sources of information included news articles, reports published by NGOs, and/or industry association information that may indicate locations from which a SOR sources. For SORs not independently verified, geographic location and mining production by country are reviewed, and specified factors are applied to determine risk levels.

3M will take additional mitigating action if credible sources provide information that identified SORs are potentially financing armed groups in the Covered Countries. 3M requires suppliers to conduct additional due diligence to confirm the presence of any of the “SORs of Interest” in the chain of custody for Necessary 3TG in products supplied to 3M.
STEPS TO IMPROVE DUE DILIGENCE

3M is alert for facts and circumstances that may require SOR-related risk mitigation. 3M also expects that more SORs will become validated as “RMAP-conformant” through the RMAP process and similar programs, which will increase overall transparency and accessibility to information on geographic location of SOR mines of origin.

3M, working with its Provider, will continue to expand its due diligence to further mitigate the risk that Necessary 3TG, cobalt, and other higher-risk minerals may benefit armed groups in the Covered Countries or by taking the following steps:

- Escalate those suppliers who did not provide a response to the outreach request to obtain future alignment with requests or disposition accordingly.
- Follow up with those in the Supplier Group that were unresponsive or did not provide sufficient information for the 2020 reporting year, thereby improving both supplier response rates and the quality of supply chain information available to 3M.
- Contact those in the Supplier Group that indicated in their response to the 2020 reporting year inquiry that did not have certain key aspects of a Conflict Minerals program in order to educate and obtain updated information from them.
- Continue supplier engagement and capacity-building efforts through supplier inquiry and outreach by directing suppliers to training resources available on the 3M Supplier Direct website (https://www.3m.com/3M/en_US/suppliers-direct/) and through industry associations and RMI, in order to improve response rates and information quality.
- Stay actively involved with and continue our company membership in RMI, which provides independent third-party audits of SORs due diligence practices, including engagement in the RBA and RMI Annual Conference, Due Diligence Practices Team, and Plenary Team.
- Encourage supplier and other company membership and participation in RMI, which will strengthen industry collaboration in order to increase leverage on SORs to participate in independent third-party audits and become conformant to RMAP, LBMA, or RJC protocols.
- Contact SORs directly to undergo an audit of their due diligence practices, with the goal of becoming compliant to the RMAP, LBMA, or RJC protocols.
- Expect responsible sourcing by suppliers of 3TG in the Covered Countries through use of SORs validated as conformant to RMAP process.
- Continue the Responsible Minerals program and process to support compliance to the European Union regulation on supply chain due diligence by importers of minerals and metals originating in CAHRAs.
- Retain partnership with a third-party service provider to streamline supplier outreach, feedback and due diligence efforts.
- Expand the responsible minerals assessment and due diligence efforts to include other high-risk minerals and areas of the world, as determined by regulatory bodies and applied by RMI. In 2020, 3M included cobalt in our outreach and will continue to expand this effort.
- Accelerate escalation of identified “SORs of Interest” that are not RMAP conformant and consistent with OECD Guidance to mitigate supply chain risk. As of April 13, 2021, 3M is continuing its due diligence efforts with one supplier to mitigate supply chain risk and align such supplier with 3M’s expectations.
- Continue to evaluate upstream sources through a broader set of tools to evaluate risk. These include:
  - Using a comprehensive SOR library, with detailed status and notes for each listing.
  - Scanning for credible media on each SOR to flag risk issues.
  - Comparing the list of SORs against government watch and denied parties lists.
Cautionary Statement about Forward-Looking Statements

Certain statements in this Report may be “forward-looking” within the meaning of the Private Securities Litigation Reform Act of 1995. Words such as “expects,” “intends,” “plans,” “projects,” “believes,” “estimates,” “targets,” “anticipates,” and similar expressions are used to identify these forward-looking statements. Examples of forward-looking statements include statements relating to our future plans, and any other statement that does not directly relate to any historical or current fact. Forward-looking statements are based on our current expectations and assumptions, which may not prove to be accurate. These statements are not guarantees and are subject to risks, uncertainties and changes in circumstances that are difficult to predict. Actual outcomes and results may differ materially from these forward-looking statements. As a result, these statements speak only as of the date they are made and with no obligation on 3M’s part to update or revise any forward-looking statement, except as required by federal securities laws.
ANNEX I

As of April 13, 2021

The below list of SORs identified to 3M by the 3M Supplier Group is conformant with RMAP protocols as of April 13, 2021. 3M is typically many tiers in the supply chain removed from SORs, and our direct suppliers have not traced materials supplied to 3M back to individual SORs. Many of our suppliers provided information to 3M on all SORs identified to them by their suppliers and have not been able to confirm that Necessary 3TG processed by these SORs is contained in the products they have supplied to us because some of the suppliers did not provide their CMRT at the product level. Therefore, it is possible that the list contains SORs not used to process Necessary 3TG contained in our products.

<table>
<thead>
<tr>
<th>Metal</th>
<th>Smelter Name</th>
<th>Smelter Facility Location</th>
<th>Smelter ID</th>
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JAPAN
CID0001325

Gold
OJSC “The Gul'dzhik Krasnoyarsk Non-Ferrous Metals Plant”
RUSSIAN FEDERATION
CID0001326

(OJSC Krastsvetmet)

Gold
OJSC Novosibirsk Refinery
RUSSIAN FEDERATION
CID000493

Gold
PAMP S.A.
SWITZERLAND
CID001352

Gold
Planta Requercedora de Metales SpA
CHILE
CID002919

Gold
Proisk Plant of Non-Ferrous Metals
RUSSIAN FEDERATION
CID001386

Gold
PT Aneka Tambang (Persero) Tbk
INDONESIA
CID001397

Gold
PX Precinox S.A.
SWITZERLAND
CID001498

Gold
Rand Refinery (Pty) Ltd.
SOUTH AFRICA
CID001512

Gold
REMONDIS PMR B.V.
NETHERLANDS
CID002582

Gold
Royal Canadian Mint
CANADA
CID001534

Gold
SAAMP
FRANCE
CID002761

Gold
Safimeta S.p.A
ITALY
CID002973

Gold
SAFINA A.S.
CZECH REPUBLIC
CID002290

Gold
Sandomuck Precious Metals
KOREA, REPUBLIC OF
CID001555

Gold
SAXONIA Edelmetalle GmbH
GERMANY
CID002777

Gold
SEPMFA Joyeria Plateria S.A.
SPAIN
CID001585

Gold
Shandong Zhaogin Gold & Silver Refinery Co., Ltd.
CHINA
CID001622

Gold
Sichuan Tianze Precious Metals Co., Ltd.
CHINA
CID001736

Gold
Singway Technology Co., Ltd.
TAIWAN, PROVINCE OF CHINA
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Gold
SOE Shilykovskoy Factory of Secondary Precious Metals
RUSSIAN FEDERATION
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ITALY
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Gold
Tokuriki Honten Co., Ltd.
JAPAN
CID001938

Gold
TOO Tuy-Ken-Alty
KAZAKHSTAN
CID002615

Gold
Torecom
KOREA, REPUBLIC OF
CID001955

Gold
Umicore Precious Metals Thailand
THAILAND
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Gold
Umicore S.A. Business Unit Precious Metals Refining
BELGIUM
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Gold
United Precious Metal Refining, Inc.
UNITED STATES OF AMERICA
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Gold
Valcambi S.A.
SWITZERLAND
CID002003

Gold
Western Australian Mint (T/a The Perth Mint)
AUSTRALIA
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Gold
WIELAND Edelmetalle GmbH
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Yamakon Co., Ltd.
JAPAN
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Yokohama Metal Co., Ltd.
JAPAN
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Gold
Zhongyan Gold Smelter of Zhongjin Gold Corporation
CHINA
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ANNEX II

As of April 13, 2021

The below list of 3TG countries of origin identified to 3M by the 3M Supplier Group is conformant with RMAP protocols as of April 13, 2021. 3M is typically many tiers in the supply chain removed from SORs, and our direct suppliers have not traced materials supplied to 3M back to individual countries of origin. Many of our suppliers provided information to 3M on all SORs identified to them by their suppliers and have not been able to confirm that the countries of origin for all 3TG processed by these SORs have been used in the products they have supplied to us because they did not provide their CMRT at the product level. Therefore, it is possible that the list contains countries of origin of 3TG not contained in our products.

3M validated that SORs identified as sourcing from the Covered Countries are conformant to RMAP.

Albania; Angola*; Argentina; Armenia; Australia; Austria; Belarus; Belgium; Bermuda; Bolivia; Brazil; Bulgaria; Burundi*; Cambodia; Canada; Central African Republic*; Chile; China; Colombia; Czech Republic; Djibouti; Dominican Republic; Democratic Republic of the Congo*; Ecuador; Egypt; Estonia; Ethiopia; Finland; France; Germany; Ghana; Guinea; Guyana; Hungary; India; Indonesia; Ireland; Israel; Italy; Ivory Coast; Japan; Kazakhstan; Kenya; Kyrgyzstan; Laos; Liberia; Lithuania; Luxembourg; Madagascar; Malaysia; Mali; Mauritania; Mexico; Mongolia; Morocco; Mozambique; Myanmar; Namibia; Netherlands; New Zealand; Niger; Nigeria; Papua New Guinea; Peru; Philippines; Poland; Portugal; Republic of Korea; Russia; Rwanda*; Saudi Arabia; Sierra Leone; Singapore; Slovakia; Slovenia; South Africa; Spain; Sudan*; Suri; Suriname; Sweden; Switzerland; Tanzania*; Thailand; Turkey; Uganda*; United Arab Emirates; United Kingdom; United States; Uzbekistan; Vietnam; Zambia*; Zimbabwe

* Covered Country