

# Product Safety, Compliance, and Stewardship Policy

## Applies To

This document applies to all 3M research & development, operations, commercial activities and products.

## Introduction and Background or Purpose

3M is committed to developing, manufacturing, commercializing and selling products that are safe for their intended use(s) and compliant with all applicable Environmental, Health, and Safety (EHS) regulations and 3M expectations. 3M products are developed using a full life cycle approach with a goal to continuously improve EHS performance of products and corresponding manufacturing processes while minimizing value chain impact.

## Requirements or Expectations

Overall responsibility for ensuring compliance with this document is assigned to the Environmental, Health and Safety, Product Stewardship and Regulatory Affairs Organizations

Each 3M Business Unit must maintain processes for the effective global review of product safety, compliance, and stewardship requirements. This includes consideration of EHS aspects relevant throughout the life cycle of a product, including raw material selection, product design, formulation, manufacture, marketing, sale, intended and anticipated use or misuse, recycling, and disposal. Business processes must be incorporated into New Product Introduction (NPI) and Change Management Procedure (CMP), and product safety, compliance, and stewardship requirements must be integrated into the development, commercialization, and sale of 3M products. Associated documents and data must comply with 3M record retention requirements. Corporately designated systems of record will be used as applicable (see corresponding Standards for detail).

To ensure effective governance of product safety, compliance, and stewardship requirements, Business Units must maintain processes to:

- Assess and manage potential hazards and risks to ensure products are safe for their intended and anticipated use or misuse. This includes, but is not limited to, chemical, physical, electrical, mechanical, biological, environmental hazards and associated risks.
- Develop products in consideration of the full life cycle, monitor and strive to continually improve the EHS performance of products and minimize value chain impact.
- Understand and effectively manage and communicate hazards, risks, and EHS- related technical information and claims.
- Meet and maintain continuous compliance with applicable national, regional, and local regulations and 3M expectations.

Failure to comply with these requirements may result in discipline, up to and including termination of employment.

## Additional Elements

**Product Safety** is one facet of product stewardship, focused on the act of minimizing the likelihood of injury or harm associated with use of or exposure to products.

**Product Stewardship** encompasses 3M commitments that extend beyond the foundation of product safety and compliance. Specific 3M product stewardship commitments include, but are not limited to, policies and standards regarding animal welfare, human subject research, development of occupational exposure limits, management of product related significant events, protection of confidential information, and life-cycle management.

**Product EHS Compliance** encompasses regulations, industry standards, and corporate expectations that are product-focused and driven by protection of human health and the environment. Examples include, but are not limited to US Environmental Protection Agency (EPA) Toxic Substances Control Act (TSCA) and Federal Insecticide, Fungicide, Rodenticide Act (FIFRA) regulations, US Food and Drug Administration (FDA) regulations, Regulation for Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Restriction of Hazardous Substances (RoHS), Waste of Electrical, Electronic, Equipment (WEEE), International Standards Organization (ISO) standards, and various other market and region specific product certification and registration requirements.

**3M Products** include 3M manufactured, third party or outsourced manufactured, and acquired products, as well as purchased finished goods and promotional items.

**Business Units**, as discussed in this Policy, consist of the 3M operating entities responsible for development and/or sale of a product. Product development responsibilities include laboratory functions as well as manufacturing and business teams managing outsource manufactured goods sold as 3M products.