

Product Safety, Compliance and Stewardship Policy

Applies To

This document applies to all 3M operations worldwide.

Introduction & Background or Purpose

3M is committed to commercializing and selling products that are safe for their intended use(s), compliant with all applicable Environmental, Health, and Safety (EHS) regulations and 3M expectations, and developed with a goal to continuously improve the EHS performance of products and corresponding manufacturing processes.

Requirements

Overall responsibility for ensuring compliance with this document is assigned to the Environmental, Health and Safety, and Research & Development 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 Management of Change (MOC) procedures, 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 review of product safety, compliance, and stewardship, 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.
- Review and strive to continually improve EHS performance of products.
- 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 life-cycle management, persistent chemicals, animal welfare, protection of human subjects, and paper sourcing.

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.

Business Units, as discussed in this Policy, consist of the 3M operating entities responsible for development and/or sale of a product. This includes each division and subsidiaries with P&L responsibility. Product development responsibilities include laboratory functions as well as manufacturing and business teams managing outsource manufactured goods sold as 3M products.