

3M United Kingdom PLC Modern Slavery Statement

This statement has been published in accordance with the provisions of the Modern Slavery Act 2015. It sets out the steps taken by 3M United Kingdom PLC (“3M UK”) during the financial year ending 31 December 2018 to prevent modern slavery and human trafficking in its business and supply chains.

Introduction from Irfan Malik, Managing Director of 3M UK

We, as an organisation, are proud of the steps we have taken, and continue to take, to combat slavery and human trafficking.

As a subsidiary of 3M Company (“3M”), 3M UK is committed to respect for human rights, in our own operations and in our supply chain. 3M’s [Global Human Rights Policy](#) was adopted in 2013, and 3M became a signatory member of the United Nations Global Compact (UNGC) in early 2014, thereby committing to align our operations and strategies with the UNGC principles on human rights.

Within our own business, 3M’s approach for respecting human rights aligns with 3M’s [Code of Conduct](#), which recognises the rights of employees to have a respectful workplace. 3M continues to implement our human rights programme through our global policy statements and a management system utilising self-assessments, audits, and training.

3M’s Code of Conduct requires 3M employees to select and retain suppliers, contractors, outsourced manufacturers, and service providers who comply with all applicable laws and regulations and align with the 3M values in the areas of labour and human rights, the environment, health, safety, and ethics. 3M also has a [Supplier Responsibility Code](#), which outlines expectations for its suppliers to assure their programmes and practices, as well as those of their sub-contractors, involved in the supply of products and/or services to 3M, conform to standards that are consistent with the 3M Supplier Responsibility Code.

3M’s Supplier Responsibility Code is available in 15 languages and applies to the selection and retention of all 3M suppliers globally. Under this Code, 3M suppliers: are expected to comply with all labour, ethics and management systems expectations; local country labour and human resource laws; cannot use labour that is obtained through mental or physical coercion, physical punishment, slavery or other oppressive labour conditions; and cannot engage in any form of human trafficking. The latter prohibition includes forced labour and other forms of coercive conduct and the recruitment, harbouring, transportation, provision, or obtaining of persons for commercial sex acts and the legal or illegal procurement of sex acts for anything of value.

More details on our expectations for suppliers are described in the Suppliers section of 3M’s [Sustainability Report](#).

Organisation's Structure

3M United Kingdom PLC's parent company is 3M Company. 3M Company has its head office in Minnesota, USA. 3M is a global manufacturer which operates in over 70 countries and has approximately 92,000 employees worldwide.

All supply chain related actions are led by 3M EMEA GmbH as detailed in the "Our Supply Chain" section of this statement below.

Our Business

3M's work can be broken down into 12 areas of expertise: automotive; commercial solutions; communications; consumer; design and construction; electronics; energy; health care; manufacturing; mining; oil and gas; and safety and transportation.

Our business is organised into 4 business groups:

1. Consumer
2. Health Care
3. Safety & Industrial
4. Transportation & Electronics

Our Supply Chain

3M UK's supply chain is managed by 3M EMEA GmbH ("3M EMEA"). 3M EMEA is the central and unique 3M operating entity in the Europe, Middle East, and Africa (EMEA) region undertaking a centrally managed, borderless and coordinated EMEA sourcing, manufacturing, supply chain and distribution process organisation in such a manner as to centralise key strategic and decision-making processes relative to the supply chain.

3M's supplier network is a diverse, broad supply chain providing the many raw materials and services needed to support global manufacturing in the areas described above. 3M has over 78,000 suppliers from 110 countries classified in 11 categories over 300 sub-categories. We procure from large multinational companies like our own, and from small and medium-sized businesses. Our material suppliers have suppliers of their own – 3M is typically three to six tiers away from the original source of the components of our purchased materials.

Our Policies on Slavery and Human Trafficking

Policies on slavery and human trafficking of our parent company, 3M, apply to 3M UK and 3M EMEA. We have a robust stance against slavery and human trafficking as set out in our labour and employment policies and business conduct policies. These policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls so that slavery and human trafficking does not take place within our organisation and supply chains.

1. *3M Policies on Labour and Employment*

At 3M, we believe it is essential to provide a work climate that:

- Respects the dignity and worth of individuals
- Encourages the initiative of each employee
- Challenges individual capabilities
- Provides equal opportunity

To this end, 3M has adopted strong employment, labour, and worker protection principles that apply to 3M employees worldwide. We value a diverse workforce and have extensive programmes to identify, hire, educate, and promote employees with a wide range of skills and attributes. 3M prohibits workplace harassment, and we respect workers' freedom to associate, which assures we respect the ability of employees to choose whether or not to join unions and engage in collective bargaining, as permitted by applicable laws in the countries where 3M does business. We prohibit the use of forced or bonded labour, which we interpret to include slavery or human trafficking, or the employment of children under 16 years of age, or the minimum age established by local law if older. 3M implements robust global processes to assure the occupational health and safety of our workers and the safety of the communities in which we operate.

For a summary of 3M's policies for its facilities and employees related to labour and employment, we invite you to review the Human Rights section of 3M's Sustainability Report.

2. *3M's Code of Conduct*

3M's Code of Conduct clearly states the commitment of all 3M employees to compliance with all applicable laws and regulations in the conduct of our business activities. This extends to laws regarding slavery or human trafficking in the countries in which we do business. Because we want 3M's values to be clear to all with whom we do business, 3M publishes its Code of Conduct handbook in 24 languages on the [Internet](#).

3. *3M Supplier Responsibility Code*

3M sets a high bar for itself regarding labour and employment and it expects the same from its suppliers. The 3M Supplier Responsibility Code (and before that, our Supply Chain Policies) specifies the labour, health and safety, environment, ethics and management systems expectations we have for our suppliers. The Labour section of our Supplier Responsibility Code includes baseline requirements in the areas of:

- Freely chosen employment
- Young workers
- Working hours
- Wages and benefits
- Humane treatment
- Non-discrimination
- Freedom of association

3M expects conformance to this Code by our new and existing suppliers, anywhere in the world, and for any supplied material or service. We expect suppliers to establish programmes that are consistent with the 3M Supplier Responsibility Code, and this expectation is included in our global supply contracts and master agreements. 3M evaluates Code conformance of existing and potential new suppliers through a self-assessment and onsite audit programmes. More information about this work can be found in the Risk Assessment and Auditing section below and the Suppliers section of our Sustainability Report.

Due Diligence Processes for Slavery and Human Trafficking

3M has a dedicated team to address the issue of modern slavery, which consists of involvement from the following departments:

- Strategic Sourcing & Packaging Solutions (Sourcing)
- Ethics & Compliance
- Legal
- Human Resources
- Sustainability
- Government Contract Compliance

This team is charged with implementing 3M's Due Diligence Management System for identifying, and addressing, the risks of modern slavery in our operations and our supply chains, which includes:

- Strong policies and management systems, including executive engagement
- Identification and assessment of potential risk areas in our supply chains
- Risk mitigation, including external training/capacity building and new supplier qualification
- Assessments and audits
- Reporting

Supplier Contracts and Certification

3M communicates its human rights and labour expectations to suppliers through contract clauses, links to 3M's website and in direct business meetings. 3M UK's General Conditions of Purchase and supplier contracts contain provisions to which suppliers agree, as a form of self-certification, that they will comply with all applicable local laws and regulations and adopt standards of business conduct that are consistent with 3M's [Business Conduct Policies](#). 3M UK's General Conditions of Purchase were also updated in 2017 to include provisions that the supplier warrants that (i) all products/services supplied shall be provided without use of labour resulting from mental or physical coercion, physical punishment, slavery, human trafficking or other oppressive labour conditions and (ii) the supplier shall (and shall procure that its representatives or sub-contractors will) perform its obligations in compliance with the Modern Slavery Act 2015.

3M EMEA's relevant contract templates include provisions setting out a requirement for its suppliers to comply with all 3M's expectations including 3M's Supplier Responsibility Code.

Risk Assessment and Auditing

In order to combat the risk of slavery and human trafficking, we take steps to identify those areas of our business where there may be a risk of slavery or human trafficking. As part of a global process, 3M procures key external informational resources to identify where there could be a risk of slavery and human trafficking.

3M follows a risk-based approach to prioritise 3M suppliers who will be assessed based on a variety of factors, including their working conditions and employment practices, such as forced labour and human trafficking. 3M internal staff conduct announced on-site audits. Suppliers who do not pass this assessment do not qualify to supply 3M.

The focus of our risk assessment is primarily on goods-producing suppliers that feed into our saleable products. Globally, these suppliers represent 45 percent of spend, and cover almost 19,000 3M tier 1 production materials suppliers and contract manufacturers.

For existing suppliers, 3M has implemented a supplier risk evaluation process to help assure that we assess suppliers that could be at risk for non-conformance with our Supplier Responsibility Code, including the human rights elements. The risk factors used in this process include geographic risk, business risk, type of operations and annual 3M purchases. We conduct this internal supplier risk evaluation process on an annual basis.

Suppliers prioritised for assessment as described above will be asked to complete a self-assessment questionnaire (“SAQ”). The SAQ is used to understand supplier programmes and whether they meet the expectations of the 3M Supplier Responsibility Code.

Following prioritised suppliers’ completion of the SAQ and review by 3M, an on-site audit may be conducted. If any deficiencies are identified during the on-site audit, a corrective action plan is developed. 3M conducts follow-up on identified corrective actions to assure that deficiencies are resolved, and measures put in place to prevent reoccurrence.

3M’s supplier assessment process has become more involved and comprehensive. In 2018, 3M completed more than 550 assessments, which included the comprehensive Responsible Business Alliance framework and expanded from 10 to 18 countries, covering every region of the world.

3M’s supplier assessment and auditing programme is implemented by 3M’s Strategic Sourcing organisation, with oversight from the strategic sourcing leadership as well as the 3M Supply Chain Executive Committee. This committee consists of executive leaders from 3M Supply Chain, Strategic Sourcing, Human Resources, Ethics and Compliance, Legal, Environment, Health and Safety, and Sustainability. These topics are also discussed by the Science, Technology, and Sustainability (STS) Committee, our executive team, and taken up annually as an agenda item for the 3M Board of Directors, as required. In 2018, STS members included our Executive Chairman of the Board, Chief Executive Officer; Senior Vice President and Chief Financial Officer; Senior Vice President Research and Development, and Chief Technology Officer; and Vice President and Chief Sustainability Officer.

Risk Mitigation

The self-assessments and on-site audits of suppliers have revealed that most suppliers are meeting 3M's expectations. Those requiring improvement are to provide information on what they will do to correct the identified gaps and prevent reoccurrence of the issue. Suppliers with corrective action must pass a 3M re-qualification assessment after completing the necessary steps to retain 3M business. Most suppliers work very quickly to address any 3M findings. Those suppliers unwilling or unable to take the necessary corrective action in a timely manner may be subject to termination by 3M.

Within 3M, our approach to managing and assuring human rights aligns with the 3M Code of Conduct, which recognizes the right of employees to have a respectful workplace. To protect that right, our Employee Relations (ER) Assessment tool enables any 3M location globally to assess its policies and practices. This tool enables local managers to identify strengths, opportunities for improvement, and action plans to address those opportunities, including a review of practices related to 3M's Global Human Rights Policy. Elements include: safe and healthy workplace, respectful workplace, workplace security, work hours and wages, freedom of association, child labour, forced labour or recruitment fees to obtain employment. Evaluations are integrated into other assessment and management processes, based on material issues regardless of where they are identified within the value chain. Sites can then request the assistance of 3M Corporate Staff, including Employee Relations and the Office of General Counsel, for help with addressing any issues that may be identified.

Training

All relevant non-production employees are required to review and certify compliance with our Code of Conduct on an annual basis, and complete a series of mandatory business conduct trainings based on the employee's role and area of responsibility.

To assure that employees are aware of 3M policies related to human rights, including modern slavery and human trafficking, 3M offers a comprehensive online compliance training programme to all employees worldwide. The training modules are assigned to employees based on their role and area of responsibility. Completion of 3M's Code of Conduct and Ethical Decision-Making course is compulsory for most new employees and is required for all relevant employees on a two-year cycle. This course includes content on 3M's [Respectful Workplace Principle](#), 3M's Global Human Rights Policy, and 3M's commitment to human rights. This course also provides awareness to employees about 3M's expectation for reporting all suspected violations of law or 3M Code and the different channels available for raising such concerns. 3M offers a comprehensive online compliance training program to all employees worldwide. For instance, our global employees in 3M's Strategic Sourcing, Supply Chain, and Legal organisations received a course titled Introduction to Eliminating Forced Labour, Slavery, and Human Trafficking from Global Supply Chain. Online courses are offered in 22 languages.

3M's website also has information on corporate policies, as well as links and additional information on how to report any concerns. The external website was updated to include courses made available to our suppliers with information on the relevant laws and principles for doing business the right way.

Online courses are available on our [3M Business Partner Compliance Awareness training site](#), which include:

- Global Bribery and Corruption Awareness
- 3M Anti-Bribery Awareness Course Certification
- Introduction to Eliminating Forced Labour, Slavery, and Human Trafficking from the Global Supply Chain
- Working Together to Prevent Corruption and Mitigate Compliance Risk for Distributors/Business Partners

In 2018, training was provided to more than 200 Supplier Responsibility Code assessors globally to assure a detailed understanding on the 3M Supplier Responsibility Code's expectations, processes, and supporting tools. The training covered each of the elements of the Code, including labor and human rights, health and safety, environment, ethics, and management systems requirements. In addition, training materials were made available on 3M's business partners website for suppliers to expand their knowledge in such topics as global bribery and corruption awareness; eliminating forced labor, slavery, and human trafficking from the global supply chain; and preventing corruption; and mitigating compliance risk for distributors and business partners.

Reporting Concerns/Grievance Mechanisms

Pursuant to the 3M Code of Conduct, employees are responsible for notifying management when they suspect that a violation of law or our policies has occurred or is likely to occur. 3M has several means by which an individual can report his or her concerns. An employee or any third party, including customers, suppliers, or the general public, may report a concern online or by phone, to [3MEthics.com](#) and may do so anonymously, if local law allows. 3MEthics.com is managed by a third-party vendor and is available 24-hours a day and supports over 200 languages. In addition, employees have several additional channels to report issues or concerns, including their supervisor, 3M Management, 3M Legal Counsel, 3M Ethics and Compliance, or any Human Resources professional.

Regardless of how concerns are raised, 3M will assign an individual to assure that the concern is investigated and addressed in a timely manner. 3M does not tolerate retaliation of any kind for reporting a business conduct concern or cooperating with an investigation. 3M expects reports to be made in good faith. 3M employees in leadership roles are expected to act with integrity and honesty and to build a culture of compliance by working to prevent, detect and support the efforts to respond to potential violations of law and 3M policies.

Our Effectiveness and Ongoing Efforts in Combating Slavery and Human Trafficking

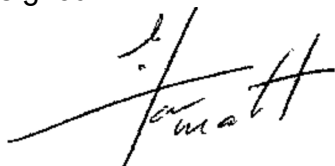
3M is committed to measuring and continuously improving the effectiveness of our due diligence programme regarding modern slavery and human trafficking. To that end, our global implementation team holds regular meetings throughout the year for review and ratification by our executive steering team, focusing on relevant aspects of our due diligence management system described above.

The team meets with the intention to make further strides to combat slavery and human trafficking, including:

- We will continue to identify ways to improve employee and supplier awareness of 3M's commitment to respect human rights and efforts to prevent modern slavery and human trafficking
- We commit to keeping abreast of information on global risks of slavery and human trafficking
- We will continue to focus our assessment programmes on internal and external operations with the highest risk of potential human rights violations
- We will continue to strengthen our due diligence management system to identify and address any salient human rights issues within our sphere of influence, and stay aligned with internationally-accepted frameworks like the UN Guiding Principles
- 3M will continue to strengthen contracts with suppliers and other forms of self-certifications that confirm suppliers will not provide products or services to 3M that use labour resulting from mental or physical coercion, physical punishment, slavery, human trafficking or other oppressive labour conditions

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of 3M United Kingdom PLC for the financial year ending 31 December 2018. It has been approved by the Board of Directors of 3M United Kingdom PLC on 6th June 2019.

Signed:

A handwritten signature in black ink, appearing to read 'Irfan Malik', written over a horizontal line.

Irfan Malik, Managing Director
3M United Kingdom PLC

Date: 6 June 2019