

United States Non-Employees 3M Worksite Pre-Assignment Requirements

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I. Introduction

3M utilizes various Non-Employee classifications (hourly/daily, contingent deliverable, outsource service and independent contractors) as one part of its overall workforce strategy. A Non-Employee is the employee of another organization or company, such as a temporary employment agency or professional services firm, who is on assignment at 3M. The Supplier is the employer of the Non-Employee. The 3M Assignment Supervisor/Contact is the 3M employee responsible for the Non-Employee while they are on assignment at 3M.

In order to promote a productive, safe and secure work environment at 3M locations and to comply with various laws, regulations and 3M policies, 3M has established pre-assignment requirements ("Requirements") for Non-Employees and the companies that assign them to work at 3M (hereinafter referenced as "Supplier" or "Seller").

II. Scope of Coverage

These Requirements apply to all U.S. based Non-Employees requiring unescorted access to 3M facilities and/or access to 3M corporate systems, and as applicable, to Suppliers.

III. Non-Employee and Supplier Requirements

Non-Employees requiring unescorted facility access or 3M internal system access must meet the applicable pre-assignment Requirements identified below, prior to the first day of assignment. The Supplier is responsible for ensuring that Non-Employees assigned to 3M meet these requirements. 3M, as part of its Supplier contracts, may audit to ensure compliance.

IV. Requirements that apply to all U.S. Non-Employees

Policies that must be reviewed AND acknowledged by the Non-Employee

U.S. Non-Employees Pre-Assignment Requirements Cont.

3M Non-Employee Code of Conduct Certification

All Non-Employees will be required to review and sign their acknowledgement of [3M Non-Employee Code of Conduct Certification Policy](#). Suppliers are responsible for ensuring that this Requirement is met prior to the start of assignment. Additional due diligence and 3M legal and/or business approvals are required if the contingent assignment includes acting on behalf of 3M to interact with government officials, public entities (e.g. university hospitals), government inspectors, entities that are partially or wholly government-owned, international organizations (U.N., Red Cross), or political parties/candidates. If the assignment includes those responsibilities, the 3M organization retaining Non-Employee services should contact 3M Contingent Workforce Solutions (CWS).

Seller Personnel Agreement (Confidentiality, Invention, and Privacy Agreement)

Non-Employees assigned to 3M projects on behalf of suppliers are required to protect and maintain the confidentiality of 3M's confidential and proprietary information, and typically also required to assign to 3M certain inventions they may make as a result of their assignment, and provide 3M certain rights regarding privacy information needed for administrative purposes. Non-Employees must sign an agreement containing appropriate provisions, prior to the start of their 3M assignment. The [Seller Personnel Agreement](#) is the preferred such agreement for all Non-Employees, and must be executed unless the confidentiality and other obligations are addressed through another agreement already in place that includes appropriate provisions. Supplier will review the worker's obligations and the Seller Personnel Agreement with the Non-Employee, and obtain the Non-Employee's signature prior to the start of the 3M assignment.

Beeline Data Privacy & Consent (Exhibit I)

Suppliers of Contingent Hourly/Daily Workers will review the [Beeline Data Privacy and Consent](#) form with the Non-Employee and obtain their signature prior to transmitting any personal information to 3M.

NOTE: *The form must be signed within thirty (30) days of the candidate's submission to the Beeline request.*

Physical Access Control Policy

3M desires to provide a safe and secure work environment for all individuals who do business with 3M. 3M policy is to control physical access to all 3M facilities and to create and maintain records of individuals entering and exiting 3M facilities. Suppliers of Non-Employees working at 3M will review [3M's Non-Employees Physical Access Control Policy](#) with the Non-Employee and obtain their signature prior to the start of an assignment at 3M.

NOTE: *Non-Employees in Offsite Third Party Worker assignments may be exempt if their access to 3M facilities is limited. Please consult with your CWS Staffing Consultant with questions.*

System Access Control Standard

Access to 3M computing systems is necessary for a wide variety of users to perform their job duties and for the benefit of the corporation. Security and controls must be in place to ensure that such access is granted only to those who need it. Persons with access to 3M systems must ensure that such systems are protected through compliance with all access control standards. Suppliers of Non-Employees working at 3M will review [3M's System Access Control Standard](#) with the Non-Employee and obtain their signature prior to the start of an assignment at 3M.

U.S. Non-Employees Pre-Assignment Requirements Cont.

3M Policies

Suppliers are also required to review the following additional 3M compliance policies and principles with their Non-Employee: **Violence Prevention Standard, Ethical Business Conduct Principle, Drug & Alcohol Policy, Electronic Resource & Acceptable Use Policy, Use of Cell Phone and Other Portable Electronic Devices When Driving Standard, Firearms in 3M Facility Standard, Communications Policy, Government Contract Compliance, Social Media Policy, Badge Standard, Photography and Audio Recording Policy**. The Non-Employee should then sign the attached 3M Non-Employee Policies Acknowledgement form. All of these policies and the attached form are located within the [3M Non-Employee Policies](#) document.

Other Supplier Obligations

Sanctioned Parties list

Suppliers of Non-Employees must verify that the Non-Employee is not on any of the U.S. Government's "Sanctioned Parties Lists," which are: (a) the Commerce Department's Denied Persons List, Unverified List and Entity List; (b) the Treasury Department's Specially Designated Nationals List; and (c) the State Department's Debarred List and Nonproliferation Sanctions list. To access these lists, reference the Department of Commerce website at: <https://www.bis.doc.gov/complianceandenforcement/liststocheck.htm> and the search tool at <https://www.export.gov/csl-search>.

Unique ID

To create a unique identification number in the Contingent Workforce System (Beeline), Suppliers are required to provide the Non-Employee's month and date of birth as well as the worker's middle initial. Suppliers assigning Non-Employees to 3M should enter this information when entering their employees in the Contingent Workforce System.

NOTE: All Non-Employees should be submitted with their full legal name. Year of birth is NOT required and should NOT be provided.

Age Verification

Suppliers must verify that their Non-Employee assigned to 3M is 18 years of age or older; 3M is not asking for the Non-Employee's specific age as part of this verification.

Background Screening

3M is committed to taking reasonable steps to ensure that it appropriately protects its people, property, and information. Suppliers will perform background screening per 3M's requirements for being given unescorted access to 3M facilities and/or 3M systems during their assignment at 3M. 3M reserves the right to decline assignment of any non-employee worker based on the pre-assignment screening results.

A new background screen will be required for Non-Employees with a break in service of six months or greater. If a Non-Employee begins an assignment with a new supplier, the supplier will be required to initiate all onboarding requirements regardless of any break in service.

- Suppliers will verify that the Non-Employee's social security number is both valid and active as defined by the U.S. Social Security Administration. In most cases, the Supplier's I-9 verification should meet this requirement. Suppliers will utilize the social security number to conduct both a national and county specific criminal background search for the previous seven years.

U.S. Non-Employees Pre-Assignment Requirements Cont.

- County searches must include all counties in which the Non-Employee lived during the immediately preceding seven years. If Non-Employee has lived in a non-US jurisdiction at any time during the immediately preceding seven years, Seller will also conduct criminal background checks in those jurisdictions to the extent the law in such jurisdictions allows
- Suppliers will verify minimum requirements as stated within the Contingent Workforce Solution's Beeline request. **ALL** Manufacturing, Warehouse & Maintenance contingent positions require a valid High School Diploma or G.E.D.
 - Verification Requirements: If the education requirement is unverifiable by the background screening vendor or remains in process after 3 business days, the Non-Employee will be allowed to begin their assignment. If the education verification results are returned with negative information, the supplier must notify the MSP immediately and the Non-Employee will be removed from their assignment within 24 hours.
 - Any education results that are pending after 30 days must be sent to 3MCWS@hays.com for decisional review.

Pre-assignment screening results for non-employee workers will be adjudicated against the following & reviewed by 3M for final approval.

- Background results that demonstrate any Felony level convictions within the last 7 years from the proposed date of assignment should be sent to 3M for review. In addition to Felony level convictions, 3M requests that you also forward for review results that indicate:
 1. Any conviction involving drugs, theft, violence, Information Technology theft & domestic crimes in the last 7 years. The review period is 7 years from the proposed date of assignment, but if the candidate has been incarcerated at any time for the past 7 years, the review should go back an additional amount of time equal to the amount of time that the individual was incarcerated. (For example, if the individual was in jail for the last three years, the review period is ten years—seven years plus an additional three years)
 2. Any conviction for a driving offense, but only if the individual will have responsibilities that include driving while performing services for 3M
 3. Any background results that establish a pattern of criminal convictions, defined as three or more criminal convictions during the seven-year period of review

Please send the following information directly to 3MCWS@hays.com for Non-Employees being considered for assignment:

- Candidate's Full Legal Name
- Contingent position (job title) for which the candidate is being considered
- Physical location for which the candidate is being considered
- Full background screening report
 - Partial background screening reports will not be accepted
 - Background screening report must include the candidate's name
 - Please remove any additional personal identifying information (i.e. SSN, date of birth)

NOTE: Any Non-Employee being placed in a position that requires driving a 3M vehicle as part of the assignment will require a search of his/her driving record by the background screening vendor. Any moving violations are automatically considered 'decisional' and will need to be reviewed & approved by 3M prior to engaging the Non-Employee on his/her assignment (see decisional background process).

U.S. Non-Employees Pre-Assignment Requirements Cont.

Drug Screening

Suppliers will perform the drug screen per [3M's Drug Screening Requirements](#). A third party supplier will perform this service for Independent Contractors. Only Non-Employees who meet 3M's drug screening requirements are eligible for assignment. A new drug screening must be completed for Non-Employees with a break in service of six months or greater. A drug screen is required for on-site Non-Employees with a non-escort (i.e. yellow) badge. Off-site Non-Employees who are granted systems access only are not required to complete a drug screening. Non-Employees in Delivery Driver, Offsite Third Party Worker and Volunteer assignments may be exempt if their access to 3M facilities or corporate systems is limited.

UPDATE: *Drug Screens for Non-Employees must be initiated within **two full business days** of the offer being accepted in the Contingent Workforce System.*

Verification of Work Authorization

Suppliers of Non-Employees will verify that Non-Employees have valid U.S. work authorization. Only Non-Employees with valid U.S. work authorization are eligible for assignment.

3M requires all suppliers to comply with applicable laws concerning work authorization. Suppliers may be exempt from detailed verification or audit requirements if placing Non-Employees in Delivery Driver, Offsite Third-Party Worker or Volunteer assignments as access to 3M facilities or systems is not required or limited.

Former 3M Employees and/or Former Contingent 3M Workers

Former 3M employees or former Non-Employees may be ineligible for assignment. The Supplier is responsible for verifying with the worker if they have worked at 3M previously as an employee or Non-Employee; Non-Employee Suppliers should indicate this status in the resource's profile in the Contingent Workforce System, and service worker suppliers should provide this information to the 3M Requester. The Contingent Workforce Solutions program team will verify eligibility for assignment.

Conflict of Interest:

Non-Employees, and third parties to whom this Principle applies must be free from conflicts of interest that could adversely influence their judgement, objectivity, or loyalty to the company in conducting 3M business activities and assignments. Employees and non-employees must avoid situations where their personal interests could inappropriately influence, or appear to influence, their business judgement. This is called "conflict of interest". Even the perception that personal interests influence business judgement can hurt 3M's reputation and business. Employees and non-employees may take part in legitimate financial, business, charitable and other activities outside their 3M jobs, but any real, potential, or perceived conflict of interest raised by those activities must be promptly disclosed to management and updated on a periodic basis. Local policies and procedures may require employees to provide timely and complete conflict of interest certifications.

Former or Current Government Employee

Suppliers will comply with the following 3M process for reviewing U.S. Contingent workforce. If a Non-Employee (or household member of a Non-Employee - household member is defined as persons living with Non-Employee on a regular basis) has been employed by a U.S. Federal, State, Local or Foreign Government (either as a civilian or in the military), or in a Reserve or Guard component of the Armed Services, or in any other position then the supplier will issue the [Conflict of Interest Questionnaire](#) to the Non-Employee and will attach the completed questionnaire to the candidate's profile in the Contingent Workforce System for 3M review. Upon review, 3M will advise the supplier of any further requirements which may include additional questions.

NOTE: Non-Employees in the following positions (job titles) are exempt: Cafeteria Worker, Construction/Maintenance, Custodian/Janitor, Delivery Driver, EAP Professional, Engineering Worker, IT Managed Service Offshore Worker, Mail/Shipping Handler, Manufacturing/Warehouse Material Handler, Occupational Health Professional, Offsite Third Party Worker, Service Worker, Supplier Representative, Trainer, Unpaid Worker and Volunteer. **Non-Employees in the following job categories are exempt:** Manufacturing & Warehouse.

U.S. Non-Employees Pre-Assignment Requirements Cont.

V. Requirements that apply to specific Non-Employees only

Non-Employees who work on Export Control issues

As a global company, 3M must comply with various export regulations, collectively known as export controls. All 3M businesses must adhere to these regulations in order for 3M to sell or otherwise export from the U.S. certain products, technology, and equipment, as well as share certain export-controlled technology with "non-U.S. persons" within the United States. If an assignment is subject to export control requirements, suppliers of Non-Employees will comply with 3M's export control process.

- 3M will notify suppliers if the assignment is subject to the export control requirements through the request in the Contingent Workforce System. If the assignment is subject, the Non-Employee must disclose their country of birth, current citizenship(s) and the order in which they were obtained, if more than one.
- Suppliers will provide birth country and citizenship information, and any requested supplemental information, to 3M through the Contingent Workforce System via a completed [Export Control Template](#) in order for 3M to determine whether Non-Employees are eligible for an export controlled assignment.

Non-Employees assigned to manufacturing operations

All Non-Employees in a Manufacturing or Warehouse assignment must meet requirements for the 3M Manufacturing Qualification Test to be eligible for assignment. Suppliers of Non-Employees are required to administer this test to their Non-Employees and deliver the results on a monthly basis to 3M Corporate's Talent Measurement Group. If a passing score is achieved, the worker is eligible for assignment. If a passing score is not achieved, a six-month waiting period is required before the worker can re-take the test.

- A passing score must be achieved prior to engaging the worker on assignment.
- MESP test results are retained on file for 10 years by 3M. Please contact your Staffing Consultant to verify record of test results for returning workers.
 - Suppliers will have their Non-Employee complete the [MESP Signed Release Form](#) & will send to their Staffing Consultant to verify past results.

Non-Employees assigned to certain manufacturing, laboratory and engineering functions

Specific baseline medical surveillance exams may be required for Non-Employees in a Manufacturing, Warehouse, Laboratory, and/or Engineering positions prior to engaging the worker on assignment at 3M. 3M will notify suppliers of Non-Employees that medical surveillance is needed and will provide the following information:

- List of what medical surveillance programs are needed
- Copy of medical surveillance protocols and test instructions if needed

Suppliers must provide all medical surveillance required by governmental agencies or 3M. It is the responsibility of the suppliers to arrange for needed medical surveillance and to ensure the evaluations are completed. Once the exams are completed, suppliers must provide the 3M location's HR Representative with a copy of the Medical Surveillance Certificate for each Non-Employee.

- Medical Surveillance certificates are valid for 1 year and are retained on file for 7 years by 3M. Please contact your Staffing Consultant to verify certification status for returning workers (if under 1 year).

UPDATE: *If Medical Surveillance requirements are applicable, the Supplier will be required to have the worker complete the required exams and provide the completed certifications to the 3M location's HR Representative prior to the commencement of the Non-Employee's assignment.*

Non-Employees assigned to mining operations

Additional location specific MSHA training/pre-assignment requirements may be required. Please contact your 3M location's HR Representative for applicable location specific requirements.

U.S. Non-Employees Pre-Assignment Requirements Cont.

3M Non-Employee Compliance Audit Matrix

3M may periodically request copies of documentation for audit purposes, but unless otherwise noted, suppliers should not send copies of the documentation to the 3M Requestors or locations. Documentation should be retained for a **minimum of seven years** after the Non-Employee has completed his/her assignment at 3M.

DOCUMENT TITLE	ALL U.S. WORKERS	REQUIRED BASED ON ROLE	IF AUDITED, PLEASE RETURN
3M Non-Employee Code of Conduct Certification	X		Signed copy of document
3M Policies	X		Signed copy of document (last page only)
Seller Personnel Agreement (Confidentiality Agreement)*	X		Signed copy of document - *If providing a signed copy of The Seller Personnel Agreement, the Privacy Notice & Consent Regarding Personal Information Transfer and Storage Form is NOT required.
Beeline Data Privacy & Consent	X		Signed copy of document
Sanctioned Parties List Verification	X		Verification on your company's letterhead that your company has verified the worker does not appear on any Prohibited Parties Lists
Beeline Unique ID	X		Verification on your company's letterhead confirming that you have provided the CWS Team with the worker's legal first name, middle initial, birth month & birth day to make up the Unique ID
Age Verification	X		Verification on your company's letterhead confirming that the worker is 18 years of age or older (no other documentation required)
Physical Access Control Policy	x		Signed copy of document
System Access Control Standard	x		Signed copy of document
Work Authorization Verification		X	Verification on your company's letterhead confirming that your company has verified the worker's authorization to work
Background Screen: national & criminal 7 year screen, education & driving record verification (if applicable)		X	Provide a copy of the original background screening result (please block out any worker personal data including SSN, etc.). For any decisional backgrounds, please provide documentation of 3M's approval.
Drug Screen		X	Provide a copy of the original drug screening result (please block out any worker personal data including SSN, etc.)
Conflict of Interest		X	Provide a copy of signed documents and the email confirmation from CWS/COI team indicating that the worker is clear.
Export Control		X	Provide a copy of signed Export Control template verifying worker's citizenship status and Country of birth
MESP		X	Records retained by 3M
Medical Surveillance		X	Records retained by 3M