



# 2020

## Modern Slavery Statement

Updated June 2020

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## 3M modern slavery statement overview

This statement describes 3M and its subsidiaries actions to prevent modern slavery and human trafficking in our business and supply chains for fiscal year 2019. This statement is published in accordance with the provisions of the United Kingdom Modern Slavery, Modern Slavery Act 2018 (Cth), and California Transparency in Supply Chain Acts. This statement includes the following United Kingdom subsidiaries that are covered by the Modern Slavery Act:

- 3M United Kingdom PLC
- 3M Ireland Limited
- Scott Health & Safety Limited
- SGX WM Limited

This statement was produced in consultation with our subsidiaries to identify and assess modern slavery risks that may exist. We regularly exchange meaningful dialogue and progress through involvement from the following departments and Board briefings:

- Enterprise Operations
- Ethics & Compliance
- Corporate Affairs
- Human Resources
- Legal
- Strategic Sourcing and Packaging Solutions

3M has delegated approval authority for statement to Simla Semerciyan and has been approved by the Board of Directors of 3M United Kingdom PLC on 30th June 2020.



Simla Semerciyan, Director

United Kingdom PLC

In addition to this statement, further information on 3M and our action to prevent modern slavery and human trafficking in our business and supply chains can be found at:

[3M Annual Report, 10-k filing](#)  
[3M Annual Sustainability Report](#)  
[3M Ethics and Compliance](#)  
[3M Supplier Direct](#)

## 3M business structure, operations, and supply chains

At 3M, 96,000 employees are dedicated to apply science in collaborative ways to improve lives daily. For over 110 years, we have been dedicated to science and exploration, taking on global challenges. To understand 3M, you have to understand our Value Model. It makes us unique among companies and differentiates us in the marketplace. This Value Model links our Vision, our fundamental strengths, the priorities we're driving, and our Values as a company.

### Our Vision

3M's corporate Vision inspires and motivates us. It's our North Star, guiding our work every day:

3M Technology Advancing Every Company

3M Products Enhancing Every Home

3M Innovation Improving Every Life

Our Vision is about how we use our technology, our products, and our innovation to improve every company, every home, and every life — for each of our customers, every day. Our Vision is aspirational and drives us as we look to the future, and it serves as a daily reminder of what the 3M Brand stands for.

### Our Values

Our Values come to life through the dedicated efforts of our employees who aim to “Be 3M” — by being inclusive, respectful, encouraging, and by being champions of diversity and sustainability.

How do we become the most inclusive enterprise we can be? By attracting top talent around the world. This leads to a much more diverse 3M, a stronger 3M, a more creative 3M, a higher-performing 3M.

We believe in supporting each individual by respecting, encouraging, and challenging everyone in the company to be their best. It's embedded in our company Values, and it takes a strong, inclusive culture to make it happen. With unequivocal support, 3M employees can succeed in their individual careers, as part of a team, and as part of the entire enterprise.

3M's four business groups bring together common or related 3M technologies, enhancing the development of innovative products and services and providing for efficient sharing of business resources. We have operations in over 70 countries, bringing together a combination of our 51 unique technology platforms to produce over 55,000 products in nearly every country.

For additional information, select your location to access our applied science innovations and products at [3M.com/select-location](https://www.3m.com/select-location).

### 3M at a glance

**Sales in ~200**  
countries

**One of 30** companies  
on the Dow Jones  
Industrial Index

**100+ straight years**  
of dividends

**51 Technology**  
**Platforms** applied  
across four business groups

**50+ customer**  
**centers** around the  
world

**>120,000** patents

**\$32.1 billion** in sales

**>200** sites

**\$1.91 billion** in  
R&D spend

More than **800**  
**brands**

**96,000** employees  
globally

Over **55,000** products

## Safety & Industrial



Accelerating safety and industry performance by serving the industrial, electrical, and safety markets.

\$12B  
2019 sales

## Transportation & Electronics



Moving transportation and a connected world forward by serving automotive and electronic OEM customers.

\$10B  
2019 sales

## Health Care



Connecting people, insights, science and technology to make better health possible around the world by serving the health care industry.

\$7B  
2019 sales

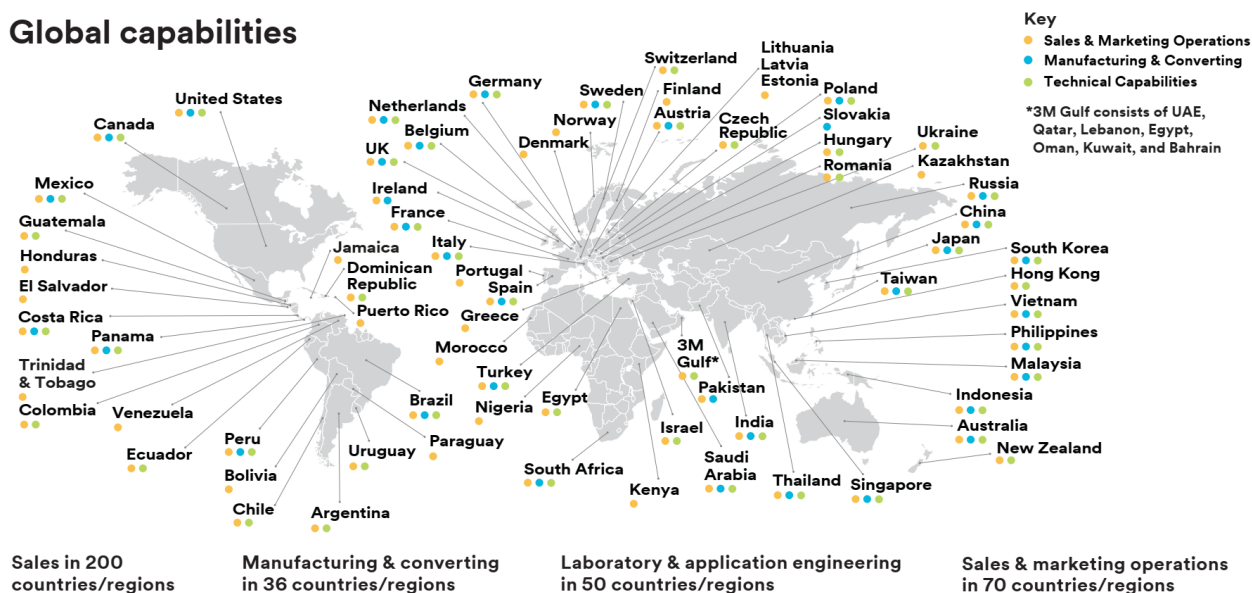
## Consumer



Innovating to simplify life and work by serving global consumers.

\$5B  
2019 sales

## Global capabilities



## Our supply chains

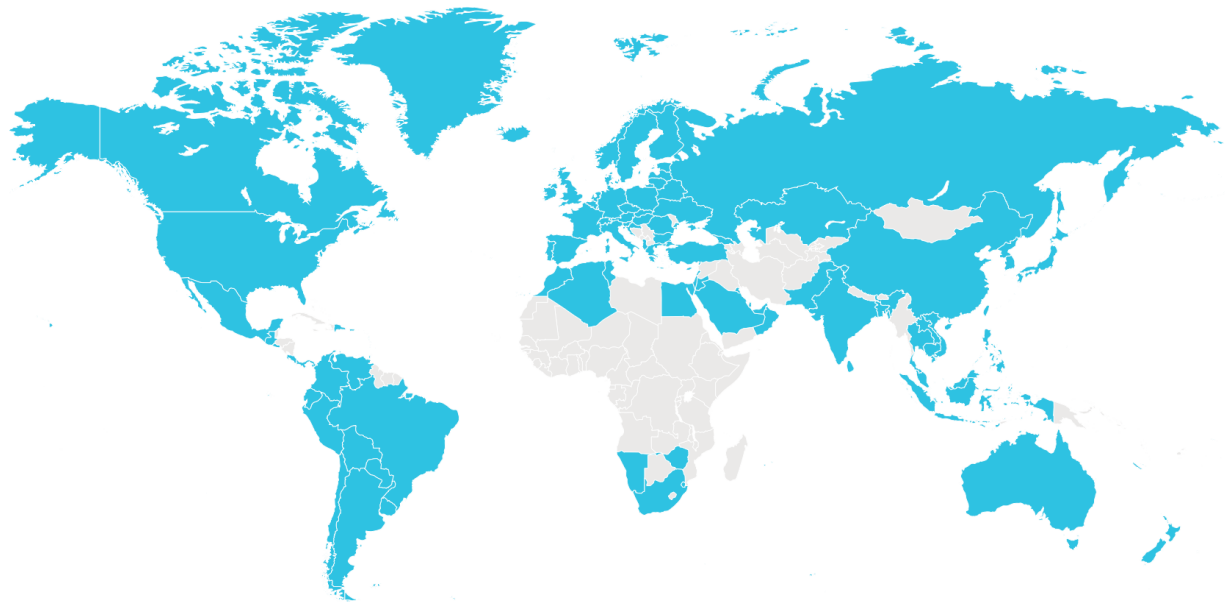
3M works with a broad, complex supply chain, consisting of over 63,900 suppliers in over 270 subcategories in 109 countries around the world. We procure from large multinational companies like our own, and from small and medium-sized businesses. Our material suppliers have suppliers of their own. 3M is typically three to six tiers away from the original source of the components of our purchased

materials, which emphasizes the importance of our suppliers having due diligence programs in place to also monitor supply chain risks.

At 3M, we set a high bar for our company regarding environmental and social governance, and we expect the same from our suppliers. 3M follows the Organization for Economic Co-operation and Development Due Diligence framework for all of our responsible sourcing activities. The [3M Supplier Responsibility Code](#) is based on 3M's corporate values for sustainable and responsible operations and aligns with the 10 Principles of the United Nations Global Compact, of which 3M is a signatory.

## 3M supply chains at a glance

### Supplier locations



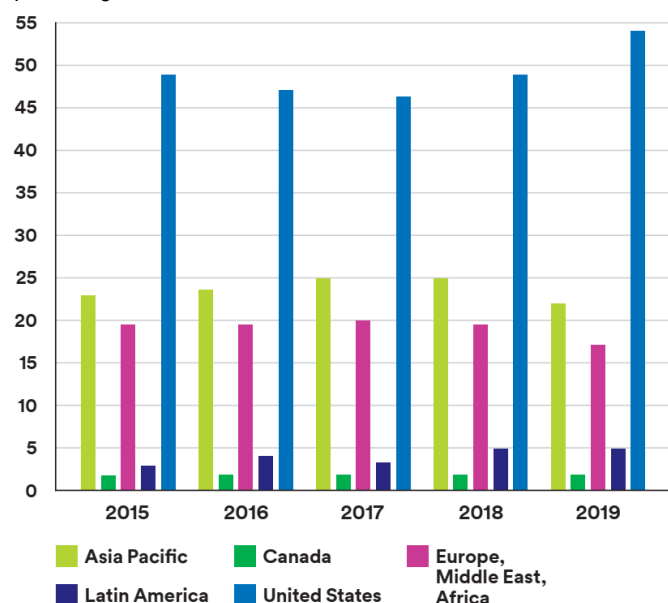
**63,900** suppliers



**270+** subcategories

**109 countries** around the world

**Supplier spend by region**  
percentage of total



## Our Values reflected in our policies and standards

Modern slavery, as an umbrella term, encompasses several human rights issues including forced labor, bonded labor, child labor, human trafficking, and slavery-like practices and is a crime which has adverse impacts on families and communities globally. We have a robust stance against these practices as set out in our labor, employment, and business conduct policies, and our Supplier Responsibility Code. These policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls, to prevent this practice from taking place within our organization and supply chains.

3M's [Human Rights Policy](#) applies to all 3M employees, contingent workers, candidates for hire at 3M, anyone doing business with or on our behalf, and others acting on 3M's behalf.

Within our own business, 3M's approach for respecting human rights aligns with 3M's Code of Conduct, which recognizes the right of employees to have a respectful workplace. 3M continues to implement our human rights program through our global policy statements, and a management system utilizing self assessments, audits, and training.

Acting with unwavering integrity and transparency is core to who we are. Every decision we make must be guided by our [Code of Conduct](#). We have one Code of Conduct that applies to our 96,000 employees in over 70 countries globally. Our Code of Conduct summarizes 3M's compliance principles and raises awareness about how to do business the right way, at all times and at every site. 3M's Code of Conduct clearly states the commitment for all 3M employees to act with integrity comply 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 in 25 languages on the Internet. 3M's Code also 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 labor and human rights, the environment, health and safety, and ethics.

### Child labor and minimum hiring age

3M is committed to doing our part to help abolish child labor. This commitment is evident in our Human Rights Policy. Although the permissible hiring age for employees may vary based on the laws of different countries, 3M has adopted global expectations regarding the hiring of minors. Even if local law permits it, 3M will not hire any employee nor engage a contingent worker (an individual provided by a third-party staffing agency to perform temporary work) below the age of 16 for any job. If the applicable laws impose a higher minimum age requirement than 16, 3M follows the stricter standard in compliance with the law.

### Forced and compulsory labor

3M complies with all applicable laws and employment regulations and does not engage or participate in forced labor. We have those same expectations for all suppliers doing business with us. This commitment is evident in our Human Rights Policy and Supplier Responsibility Code. We prohibit imposition of financial burden (withholding wages, imposing fees) on workers, recruiters or suppliers.

### Human trafficking

Our approach to human trafficking is very simple: We do not tolerate it.

Our Human Rights Policy details our prohibition against human trafficking. We are committed to using effective systems and controls to prevent human trafficking from taking place anywhere within our business or supply chains.

These prohibitions apply to 3M and its subsidiaries as well as to our federal contracts and subcontracts for either commercial or non-commercial items.



## Within our supply chains

The 3M Supplier Responsibility Code outlines expectations for suppliers to assure their programs 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 local country labor and human resource laws. The Code prohibits suppliers from using labor that is obtained through mental or physical coercion, physical punishment, slavery or other oppressive labor conditions. Further, suppliers cannot engage in any form of human trafficking, including forced labor and other forms of coercive conduct as well as the recruitment, harboring, transportation, provision, or obtaining of persons for commercial sex acts and the legal or illegal procurement of sex acts for anything of value.

The 3M Supplier Responsibility Code specifies the labor, health and safety, environment, ethics, and management systems expectations we have for our suppliers. The Labor 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

## Modern slavery risk assessment and due diligence management system

Our assessment of human rights aligns with our Code of Conduct and policies as outlined above under our Values reflected in our policies and standards, and includes these points of review: safe and healthy workplace, respectful workplace, workplace security, work hours and wages, freedom of association, child labor, forced labor, human trafficking, and recruitment fees to obtain employment. Evaluations are integrated into other assessment and management processes and are based on material issues regardless of where they are identified within the value chain. 3M's Due Diligence Management System for identifying and addressing the risks of modern slavery include:

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

## Within our operations

Within 3M, our approach to managing and assuring human rights, including modern slavery, aligns with the 3M Code of Conduct, which recognizes the right of employees to have a respectful workplace. The 3M Business Conduct Committee is comprised of several senior executives and is chaired by 3M's Vice President and Chief Ethics & Compliance Officer. This committee oversees 3M's compliance efforts to assure that 3M has an effective and world-class compliance program — one that is agile and anticipates changes in the external landscape and internal business strategy.

The Business Conduct Committee updates the of the 3M Board of Directors and 3M's executive Corporate Operating Committee, annually or as needed. Additionally, similar committees exist at country and regional levels to operationalize and prioritize compliance activities.



Our [Code of Conduct Global Employee Handbook](#), which is available in 25 languages holds all 3M employees to the same high standards. If the Code of Conduct sets a higher standard than the law, we are expected to follow the Code of Conduct and do business the 3M Way. 3M's success depends on each of us doing the right thing. No matter our job title, we are all leaders when it comes to ethics and integrity, and we must meet these important commitments:

- Know and follow the guidance set forth in our Code of Conduct
- Foster a positive, inclusive work environment and a strong culture of ethics
- Complete compliance courses and certifications on time
- Report suspected violations of the law or our Code of Conduct unless prohibited to do so by local law
- Do not engage in workplace retaliation
- Report any known or suspected retaliation
- Cooperate with investigations

3M employees, including all supervisors, managers, and other leaders, are responsible for knowing and following the ethical, legal, and policy requirements that apply to their jobs and for reporting any suspected violations of law or the Code of Conduct. Executives and managers are accountable for creating an inclusive workplace environment that encourages asking questions and raising concerns.

Upholding 3M's Code of Conduct and values is the responsibility of everyone acting on 3M's behalf. We encourage our employees to ask questions or report concerns to management, 3M's Ethics & Compliance Department, 3M legal counsel, 3MEthics.com, their assigned human resources manager, 3M Corporate Audit Department, or the Audit Committee of the Board of Directors. Our strong ethical culture requires and empowers employees to make the right choices every day. 3M makes it clear that speaking up is the right thing to do. We know our employees care about the company and want to do the right thing.

[3MEthics.com](#) is a 24-hour confidential and anonymous (where permitted by local law) helpline and online reporting system. It is managed by a third-party vendor and is available to 3M employees and others internally and externally. The system does not trace phone calls or use caller identification, nor does it generate or maintain internal connection logs containing internet protocol addresses. Web-based reports are made through a secure internet portal that does not trace or show user screen names.

The Ethics & Compliance Department has the responsibility to review every business conduct concern that is reported. After review, the department determines which reports require an investigation. If an investigation is needed, an appropriate investigation resource is assigned to the matter. For concerns that are substantiated, disciplinary actions may be taken. Discipline comes in a range of forms consistent with similar past violations, from warnings to suspensions to termination. Disciplinary actions may impact one or more persons associated with a single substantiated violation. Additional information on the 3M global allegations and disciplinary investigations and finding can be found on 3M's external [Ethics & Compliance](#) website, [Report a Concern](#), [Investigation and Findings](#).

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 program 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 organizations received a course titled Introduction to Eliminating Forced Labor, Slavery, and Human Trafficking from Global Supply Chain. Online courses are offered in 22 languages.

In addition, our Employee Relations Assessment tool enables any 3M site 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 Human Rights Policy. 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.

Based on the assessment process, we have determined that in our various spheres of influence (our own business and in others acting on 3M's behalf), the sphere with the greatest potential for human rights impact is within our supply chain.

### Within our supply chains

Our approach to managing and assuring human rights, including modern slavery within our supply chains is outlined in our 3M Supplier Responsibility Code. The Code sets the foundational expectations of suppliers in the areas of Labor, Environmental, Health & Safety, Ethics and Management systems. Modern Slavery and human trafficking are key elements of our labor expectations and due diligence.

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

3M communicates its human rights and labor expectations to suppliers through contract clauses, links to 3M's website and in direct business meetings. 3M includes a clause in our purchased goods contract templates and our general purchase order terms governing our relationships with suppliers, which as a means of self-certification by suppliers, states that suppliers will not provide products or services to 3M that use labor resulting from mental or physical coercion, physical punishment, slavery, human trafficking or other oppressive labor conditions. 3M expects its suppliers to have similar policies and practices that align with the 3M Supplier Responsibility Code, including due diligence with their suppliers. Human trafficking and forced labor-related provisions are also included in 3M's government contract flow-down requirements for suppliers.

3M's contracts and purchase order templates also 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 policies consistent with 3M's Supplier Responsibility Code, which include specific prohibitions against forced labor and other forms of coercive conduct, including labor that is a result of mental or physical coercion, physical punishment, slavery or other oppressive conditions. The Supplier Responsibility Code also prohibits suppliers and their employees from engaging in any form of human trafficking. Additional information can be found at [3M Supplier Direct](#).

3M has implemented a supplier risk evaluation process for existing suppliers to help assure that we assess prioritized 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, commodity/category risk, business risk, type of operations, and annual 3M purchases. We conduct this internal supplier risk evaluation process on an annual basis. New suppliers in higher risk regions and categories are qualified using the same criteria 3M uses for existing supplier assessments, which include their working conditions and employment practices, such as forced labor and human trafficking. 3M internal staff conduct announced on-site audits. Suppliers who do not pass this assessment do not qualify to supply 3M. We expect our suppliers to periodically assess themselves and their suppliers for conformance to our expectations.

Our general supplier performance verification process begins with a self-assessment questionnaire. The self-assessment questionnaire helps 3M understand supplier programs and determine whether they conform to 3M expectations. An on-site assessment may be conducted by 3M or a third party to assess the supplier's level of conformance with 3M's expectations. If deficiencies are identified, they will be addressed through a Supplier Responsibility Code Corrective Action Preventive Action process. Follow-up on the process may include announced or unannounced assessments.

If the assessment identifies gaps or findings, and if a supplier is not able or willing to resolve them, the process would escalate to a corporate Supplier Corrective Action Request that would involve sourcing, area manufacturing, and supply chain or and business personnel engagement. This assures appropriate resolution and conformance with 3M's requirements. If a supplier is unwilling to work with 3M on the identified gaps or is unable to close the issues within a reasonable timeframe, alternative actions are determined with a cross-functional business team to elevate and resolve the situation.

The Supplier Responsibility Code outlines supplier expectations relating to grievance mechanisms. Anyone who has a concern involving 3M can use the 3MEthics.com site as an alternative way to report a concern.

In the past nine years, we have conducted over 6,900 self-assessments or on-site audits of suppliers in prioritized countries. Along the way, our assessment process has become more evolved and more comprehensive. In 2019, 3M completed more than 550 assessments, which included the comprehensive Responsible Business Alliance framework and expanded from 18 to 31 countries, covering every region of the world.

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. 3M has disqualified new suppliers by proactively conducting Supplier Responsibility Code assessments to assure conformance with 3M's expectations.

In addition to the global Supplier Responsibility Code expectations for all suppliers, certain categories warrant additional and specific formal expectations to drive more sustainable, responsible practices. This includes our use of certain minerals with the potential to be sourced from conflict areas, our use of timber-based products and other plant materials (pulp and paper), and all new suppliers in the higher-risk countries, such as in the Asia Pacific region.

3M's supplier assessment and auditing program is implemented by 3M's Strategic Sourcing and Packaging Solutions organization, 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. In 2019, 3M formed the Science, Technology & Sustainability Committee of the Board of Directors. This committee reviews company sustainability and environmental, health & safety policies and programs for compliance with all applicable laws and regulations.

## Government relations

Under our [Be Fair Principle](#), 3M is committed to being a responsible company with uncompromising integrity in all dealings with local, state/provincial, and national governments and with their prime contractors and subcontractors around the world. In all our activities with governments, we carefully follow all applicable laws, rules, and regulations.

Before entering into any government contract, or any agreement related to a government customer, 3M employees must consult 3M's Government Contract Compliance Department or their business group's assigned legal counsel.

Human trafficking and forced labor-related provisions are also included in 3M's government contract flow-down requirements for suppliers. In the United States, the government has adopted a regulation (Federal Acquisitions Regulation 52.222-50) prohibiting human trafficking, including slavery, servitude, forced and compulsory labor, and coercion to induce a commercial sex act or to procure the same — all of which result in the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. 3M has implemented processes to assure compliance with the U.S. Federal Acquisitions Regulation, including a Human Trafficking Prevention Standard.

For more information, see the [Doing Business with Government Agencies and Contractors Principle](#).

## Modern slavery risk 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.

### Within our operations

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 program 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, 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.

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.

Employees are assigned courses based on their job function, country location, production/non-production status, and supervisor/non-supervisor and management-level status. Email notifications are sent to the employee's or their supervisor's 3M email address informing them of their course requirements and their timeline for completion. The new employee courses are due within 60 days of assignment.

If an employee does not have a 3M email address in the HR system, it is the responsibility of their supervisor (or designated trainer) to inform them of their course requirements. The email notifications include a course announcement and up to three reminders.

An annual training plan is established each year based on an assessment of internal and external factors to prioritize topics and timing of deployment. Online courses are offered in 22 languages.

Training for 3M employees on the Supplier Responsibility Code processes and tools includes a self-check exercise and final quiz to understand the effectiveness of the training. Training is provided when there have been significant changes to the Supplier Responsibility Code, processes, or tools.

## Within our supply chains

Supplier Responsibility Code training and information for suppliers reside on the 3M Supplier Direct website. Supplier Responsibility Code information is sent to suppliers prior to conducting an assessment to assure awareness of expectations — which are also addressed during supplier status review meetings.

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 2019, the Supplier Code of Conduct Steering Team provided refresher training for more than 300 assessors and sourcing professionals globally to assure a detailed understanding of 3M's Supplier Responsibility Code expectations, processes, and supporting tools. Employees received access to online training materials that covered each of the elements of the Supplier Responsibility Code, including labor and human rights, environmental, health & safety, ethics, and management systems requirements. 3M's business partners website also provided training materials for suppliers to expand their knowledge on topics such 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.

## Our ongoing commitment

3M is committed to measuring and continuously improving the effectiveness of our due diligence program regarding modern slavery and human trafficking by continuing 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
- Staying abreast of information on global risks of slavery and human trafficking
- Focusing our assessment programs on internal and external operations with the highest risk of potential human rights violations
- Enhancing our due diligence management system to identify and address salient human rights issues within our sphere of influence and staying aligned with internationally accepted frameworks like the United Nations Guiding Principles
- Strengthening contracts with suppliers, and other forms of supplier self-certification, so that suppliers will not provide products or services to 3M that use labor resulting from mental or physical coercion, physical punishment, slavery, human trafficking or other oppressive labor conditions; including implementation of policies and due diligence practices to proliferate expectations throughout the supply chain

In 2020 and beyond, we are looking at ways to recognize business opportunities that help the company grow while addressing societal issues. We cut across industries and interests to collaborate with suppliers, customers, and communities by working together to build a more resilient world. We have a unique opportunity to apply our passion and collaboration abilities to help the world prosper. This includes collaborating to continuously improve our due-diligence management system, and to identify and address salient human rights issues within our sphere of influence.