

Supplier Responsibility Code Assessment Guidance – For Suppliers

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Introduction

At 3M, we set a high bar for our company regarding environmental and social governance, and we expect the same from our suppliers. The [Supplier Responsibility Code \(SRC\)](#) seeks to formalize our current initiatives and practices to achieve a sustainable relationship with our suppliers. It applies to our entire supplier base, setting forth the principles in terms of sustainable development that suppliers are expected to comply with. 3M follows the Organization for Economic Co-operation and Development (OECD) Due Diligence framework for our responsible sourcing activities and aligns with the 10 Principles of the United Nations Global Compact, of which 3M is a participant.

The SRC Assessment criteria are also consistent with the Code of Conduct of the Responsible Business Alliance (RBA). These criteria articulates the foundational environmental and social governance expectations for suppliers.

The Criteria cover five main areas:

- Labor
- Health & Safety
- Environment
- Ethics
- Management Systems for all the above

Objective

This guideline/manual provide a framework to understand 3M's assessment program related to the requirements of the SRC. 3M understands that not all suppliers will immediately meet every requirement of the Code. However, we expect that our suppliers and their supply chain partners will make reasonable and timely progress in building the necessary tools and systems, and fostering collaborative efforts with and through their upstream suppliers, in order to holistically and globally promote social and environmental standards.

3M believes the key to addressing sustainability issues is collaboration. 3M is committed to a Policy focusing on developing improvement plans for the fulfillment of requirements. However, suppliers that fail to be cooperative or to respond to outstanding conformant issues, may be replaced. Those who comply with our requirements will have better visibility, opportunities, and market positioning.

Glossary/Terminology

- ✓ CAPA – Corrective Action and Preventive Action Plan
- ✓ ESG – Environmental and Social Governance
- ✓ RBA – Responsible Business Alliance
- ✓ SRC – Supplier Responsibility Code
- ✓ SAQ – Self-Assessment Questionnaire
- ✓ AQ - On-site Assessment Questionnaire
- ✓ VAP – Validated Assessment Program
- ✓ PPE – Personal Protective Equipment

1. Roles and Responsibilities

1.1 3M's responsibilities

3M will be responsible for the following:

1.1.1 Training and communication

[SRC – Supplier Intro](#) training is available on the 3M Supplier Direct website. The 3M Responsible Sourcing team and/or the 3M Sourcing Supplier Owner will be responsible for ensuring suppliers understand the process and informing them of an upcoming assessment/audit.

1.1.2 Supplier assessments/audits

The Responsible Sourcing Team is responsible for determining which suppliers will undergo an assessment/audit. The type of assessment to be performed will be determined by 3M. There are two different types of assessment/audits:

- Self-Assessment Questionnaire (SAQ) sent by of 3M or a 3rd party
- On-site Assessment Questionnaire (AQ) performed by 3M or by a 3rd party

1.1.3 Corrective and preventive action management (CAPA)

After the audit, the 3M Category/Sourcing Owner or Responsible Sourcing Team will review and follow-up on results. If any corrective actions are identified, 3M or the 3rd party provider will require supplier to complete Corrective Action and Preventive Action Plan (CAPA).

1.2 Supplier responsibilities

1.2.1 Undersigning of Supplier Declaration

A Supplier Declaration is available for all suppliers to confirm their company understands the 3M SRC expectations and will ensure alignment that their programs and practices as well as their sub-contractors involved in the supply of products and/or services conform to standards that are consistent with the 3M SRC. A signed SRC Supplier Declaration for all new or existing suppliers in higher risk countries is required unless one of the allowable exceptions exist:

- Signed 3M Master Agreement or Contract that incorporates SRC requirement language.
OR
- 3M's Purchase Order (PO) incorporates SRC requirement language.
OR
- Supplier has received and passed equivalent audit schemes that cover the elements of the SRC.
OR
- Supplier has their own Code that aligns with 3M's SRC and covers their own operations as well as their supplier operations.

3M Responsible Sourcing will accept submission of documented proof of compliance to the above exceptions.

1.2.2 Supplier Assessment Preparation

See On-site assessment, Section 3

1.2.3 Corrective and preventive action management (CAPA)

It is critical that a supplier follow the schedule and fulfill information requests as it relates to this audit to ensure adequate closure and necessary preventative action to prevent reoccurrence. The supplier must complete the CAPA proposal and share this with 3M within two weeks of request. Failure to meet these requirements may lead to escalation with 3M and result in cancellation of purchase orders or movement of business if an audit is not completed or if any identified remediation is not effective.

2. Self-Assessment

The Self-Assessment Questionnaire (SAQ) is used as a first step for the supplier to assess themselves and provide supporting documentation or records for 3M's review to determine level of conformance with the expectations. This questionnaire may be sent out by, and when completed returned to, 3M; or in cases where the assessment is being conducted by a 3rd party it may be completed via the RBA-online platform.

2.1 3M Self-Assessment:

A Self-Assessment Questionnaire (SAQ) will be sent to a supplier first to determine if an on-site assessment is necessary. A SAQ can also be applicable for new suppliers as a prequalification activity, especially in higher risk countries. This SAQ will be sent as an attachment via regular email.

2.2 Third Party Self-Assessment

A company may be requested to complete a SAQ via a 3rd party. This SAQ must be completed and released before an audit can be performed. The RBA SAQ can be accessed through the RBA online platform.

3. On-site Assessment

3.1 3M On-site Assessment

This chapter describes 3M's expectations for Supplier Responsibility Code (SRC) On-site Assessments.

The SRC assessment may last one or more days and be conducted by one or more assessors. The SRC assessment includes observations from physical inspections; reviews of programs, procedures, and policies; and gathering information from management and workers. Facility walkthroughs and gathering information from workers and management are intended to provide insight into Environmental and Social Governance (ESG) policies, practices, and implementation of procedures, awareness of roles and responsibilities, and management involvement. Documentation and records review provide information on how well CR management systems are defined, implemented, and sustained, and of their performance.

The on-site assessment includes the following elements:

- Assessment preparation
- Opening/Kick-off Meeting, including objectives and plan
- Facility Evaluation
- Facility tour and inspection
- Documentation Reviews
- Information gathering from management and worker interviews and discussions
- Daily wrap-up meetings
- Closing meeting to present all findings to the supplier and provide an initial opportunity for supplier input to ensure high level, mutual agreement.
- Summary report, including actions and follow-up

3.1.1 Facility Assessment Preparation

The Facility being assessed should collaboratively support applicable requests by:

- Confirming assessment dates and duration with location being assessed.
- Establishing a joint, on-site assessment agenda.
- Providing information on travel logistics, upon request: preferred hotels and airports, travel restrictions and any special considerations.
- Participating in pre-assessment of completed SAQ, including providing supporting documentation and records.
- Reviewing SRC information and expectations.
- Providing all the requested information, including manuals, records and documentation. Making them available and up to date on the day of the assessment.
- Ensuring that relevant information is available for the assessors when they arrive:
- Providing names, phone numbers and locations of the key people at the facility being assessed.
- Providing maps of the site and surrounding areas.
- Ensuring the assessors have access to the facilities (e.g., dormitories, canteens, manufacturing, assembly, and chemical storage areas).
- Ensuring staff members are available that have a thorough knowledge of the facility's Labor, Health & Safety, Environmental & Ethics policies, procedures, work instructions and records.

- Ensuring staff members are ready and able to pull sample working hour and wage data.
- Make appointments with individuals whom the Lead Assessor has requested for gathering information from workers or staff sessions.
- Appointing staff to interface with and accompany the assessors.
- Inviting appropriate staff members to the opening and closing meetings and daily wrap-ups.
- Briefing management and staff on the assessment process so they can effectively participate.
- Providing the assessors with meeting room(s), preferably with access to a telephone, the internet, printer and/or copy machine.
- Offering appropriate safety materials (PPE) to auditors/assessors.

3.1.2 Opening Meeting

All assessments should begin with an opening/kick-off meeting. The purpose of the meeting is for the Assessment Team to meet with the location's management and other personnel involved in the assessment to discuss plans for conducting the assessment safely, productively, and effectively.

The location should present a summary of business and operational issues and other information that helps the Assessment Team understand:

- ESG program organization
- Assignment of responsibilities
- ESG issues, goals and performance
- The business climate for the organization
- A summary review of facility operations
- Identification of important site activities occurring during the week
- Major changes since the last assessment
- A review of the pre-assessment documentation, including the SAQ and any previous assessment reports
- Identification of key interview candidates and availability (including relevant organization charts)
- Identification of the Assessment Team's work room
- Phone and internet protocol and support
- Identification of the site work hours
- Visitor safety and security protocols
- Discussion of the site escort protocol for visitors
- Other information upon request or of potential interest to the Assessment Team and attendees

3.1.3 Assessment Scope

The Assessment Team will review:

- Production areas
- Common areas
- Office areas
- Facility areas (equipment rooms, wastewater treatment, maintenance shops etc.)
- Material, chemical and waste storage and processing areas
- Warehouse/distribution/storage room(s); shipping and receiving
- Canteens and kitchens

- Dormitories, hostels, and any off-site housing of workers/migrant workers (if company or labor agent directly or indirectly provides accommodation for workers)
- Surrounding land (within border of factory property)
- Security room(s)
- Occupational Health and Safety room (Clinic)

3.1.4 Worker and Management Interviews

3.1.4.1 Worker interviews

Throughout the assessment, the Assessment Team will interact with workers to gather information in both formal and informal situations. Formal interaction means that the Assessment Team select and interview certain individuals; these workers will come from different areas of the facility, different shifts or positions and have different responsibilities. Informal interactions occur as the Assessment Team has brief interactions with individuals at their place of work or in other areas of the factory during the assessment.

3M requires that the location's management ensure that worker interviews can be conducted privately, without the presence of locations managers or other staff. Worker input is confidential. The location must agree at a senior level to encourage workers to be open and honest during interviews and they must actively protect any interviewed worker from retaliation (i.e., no reduction in pay or other penalties) for any information that leads to a nonconformance finding.

The number of workers selected for a formal gathering or information session will depend on facility size. Interviews may last 20 minutes or more and will be conducted in two ways: individually or in group settings. In order to provide statistically valid results, the number of worker interviews conducted, and the number of worker records reviewed depends on the number of workers at the facility.

Interviewees will be drawn from a range of workers including permanent, temporary, subcontract labor, security, cleaners, food preparation and other staff. The pool of workers to be interviewed should vary, including new and experienced workers, those in more and less skilled positions, workers from various departments and shifts, and workers of both genders. When appropriate, the interviewees should include worker representatives.

3.1.4.2 Management Interviews

Gathering information from managers provides the Assessment Team with an understanding of how the location's ESG programs were developed, implemented and are being maintained. The Assessment Team will verify statements made by site staff through a review of documents, records, physical observations and worker interviews.

Typically, the Assessment Team will interact with:

- Site manager(s)
- Production manager(s)
- Maintenance staff
- Environmental manager(s)
- Health & Safety manager(s)
- Quality manager(s)
- Internal Audit/Assessment manager(s)

- Human Resources manager(s)
- Onsite services staff such as canteen, dormitory supervisors, security staff
- Finance manager/payroll manager(s)
- Procurement/Sourcing manager/Supply Chain manager(s)
- Warehouse and Chemical store manager(s)
- Onsite medical staff (as appropriate)
- Legal
- Other personnel (as appropriate)

3.1.5 Facility Walk Through

The purpose of the facility walk through is for the Assessment Team to observe physical conditions and current practices in all areas of the facility. The Assessment Team should be free to review all physical areas of the facility and should set the pace and direction of the tour.

It is the responsibility of the facility to inform the Assessment Team of the safety rules and requirements (such as personal protective equipment (PPE)) in specific facility areas and provide the Assessment Team with necessary PPE where required.

Photos allow the Assessment Team to quickly document certain situations. The Assessment Team needs to obtain permission to take photos in the facility. Photos are not intended to contain product, product information or other proprietary information.

The Assessment Team shall not disrupt the production flow as much as possible during the facility walk through.

3.1.6 Document Reviews

As part of the assessment, the Assessment Team will review relevant records. Examples include, but are not limited to:

- Working hour records, payroll, wages, deductions and benefits
- EHS management system documentation
- Permits
- Waste records
- Incident records, including trend data
- Written policies, programs, procedures
- Training records

The documents and records must be available on-site for Assessment Team to review and must cover at least the previous 12 months.

It is recommended that a minimum of three months of pay and time records (peak, valley and average month) will be reviewed for each worker for the 12-month period prior to the assessment.

As part of the documentation review, the Assessment Team may wish to photocopy or record some information to complete their evaluation. The Assessment Team will not include any confidential information, such as detailed product information, detailed process steps, or personal identifiers in the assessment report.

3.1.7 Daily Wrap-up Meeting(s)

The Assessment Team will meet at the end of each assessment day with the facility's management to discuss the day's findings, provide the opportunity for the facility to present additional evidence and discuss issues where additional information may be needed to complete the evaluation.

The Assessment Team will clarify any further needs to ensure the assessment is performed as effectively and efficiently as possible. This is needed to prevent surprises at the closing meeting and to give facility management the opportunity to provide evidence or information that the Assessment Team may have overlooked.

3.1.8 Closing/Wrap-up Meeting

The closing meeting is held at the end of the last day of the assessment. The same group of facility personnel that participated in the opening meeting, as well as any others who would benefit from hearing from the Assessment Team, should attend the closing meeting.

All Major and Critical/Priority assessment findings will be presented during the closing meeting, ensuring that the facility fully understands those issues. In instances where the Assessment Team needs to conduct further studies (e.g., review relevant legislation) to establish if an issue observed is indeed a finding, the facts of the pending issues will be discussed with the site management. The facility is also given the opportunity to ask questions and provide additional evidence or clarification. If additional information or evidence is required, it must be provided at this stage.

For Critical/Priority Non-conformances, please be aware that:

- Critical Findings/immediate remediation actions are mandatory.
- Immediate remediation actions should be completed or have agreed upon resolution before the final report is issued.
- The Assessment Team will list the status of the immediate remediation actions as "assessor note" in the conclusion of the applicable question in the assessment report.

The supplier should complete the CAPA plan including person responsible and planned completion date and return within two weeks of receipt.

3.2 Third Party On-site Assessment

In some cases, 3M will engage a 3rd party provider to conduct an ESG audit of a supplier, depending on the level of risk associated (e.g., location of supplier's manufacturing facility, product type such as resale items, 3M customer request for social compliance audits, etc.).

3.2.1 Approved audit providers

For this 3rd party approach, we have chosen the [Responsible Business Alliance's](#) (RBA) Validated Assessment Program (VAP) to assist 3M with assessing our supplier's facilities conformance to the SRC.

The onsite RBA led audit will cover the following areas:

- Labor
- Environment
- Health & Safety
- Ethics
- Management Systems

If your facility has completed an Environmental and Social audit that is equivalent to RBA's VAP (i.e., BSCI, SMETA Sedex 4-pillar) in the last 24 months, please share that with us and we will review and determine if it is an acceptable response for this audit component.

3.2.2 Cost

The associated costs to have a 3rd party conduct the audit will vary depending on the size of the facility. Suppliers are expected to cover any costs associated with the 3rd party audit. RBA will connect with the supplier to schedule the audit, payment and agreement details, etc.

Depending upon results of the audit, 3M may request a follow-up audit be conducted.

3.2.3 3M Representatives

3M can assign a 3M Representative to join the 3rd party on-site audit.

3.2.4 Duration

A typical VAP onsite audit at a single manufacturing facility may last 2-5 days.

3.2.5 Language

All communications from Auditee to workers must be done in a language the worker can understand unless otherwise stated in the provisions.

Appendix I: Self-Assessment Questionnaire (SAQ)

Fields to Complete: Supplier = yellow No response required = grey		Rate your Company (1-10): 10 - Strong Policy & Practice 5 - Moderate Policy & Practice 1 - "No" or Weak Policy or Practice			
					0
Supplier Ratings/Comments					
X = Question applies to Indirect Supplier	X = Question applies to On-site Contractor	SECTION	Answer All Questions, unless you are an Indirect Supplier - only answer those noted with "X" in column A and if this is for an On-Site Contractor only answer those noted with "X" in column B.	Rating (per definitions above)	Comments, Particular Strengths and Opportunities, Description of Systems, Examples
SECTION 1: Labor					
X	X	1.0	Describe key aspects and rate the strength of your systems to track and comply with applicable labor and employment legal requirements. Attach or provide links to relevant documents or policy.		
X	X	1.1	Freely chosen employment Describe key aspects and rate the strength of your systems to ensure freely chosen employment. Aspects include ensuring labor is not hired through the means of threat, force, coercion, abduction or fraud for labor or services. Able for workers to freely move about the facility and to freely enter and exit company-provided facilities including, if applicable, workers dormitories or living quarters. Employees are free to leave at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract.		
X		1.1.1	Are foreign workers used? If yes, describe your process for hiring foreign workers.		
X		1.1.1.2	If yes to 1.1.1, Are foreign migrant workers made aware of the terms and conditions, provided in a written employment agreement in their native language? Is substitution or change allowed in the employment agreement after departure from the country of origin?		
X	X	1.1.1.3	Do you have workers from North Korea?		
X	X	1.1.2	Do employees pay recruitment or any reoccurring fees to either an agency or the company as a means of being offered a job?		
X	X	1.1.3	Does your company hold employee passports or government-issued identity documents against the employees will? If yes, please indicate if this is a requirement of local law, and provide a citation or link to the law.		
X	X	1.1.4	Does your company use prison labor?		
X		1.1.4.1	Does your company use involuntary prison labor, or any workers subject to the control of the penal system, or otherwise under compulsion to work?		
X	X	1.2	Young workers Describe key aspects and rate the strength of your systems used to verify the age of all workers and compliance with local age restriction laws.		
X	X	1.2.1	Do you employ any workers under the age of 18? If yes, describe your process for hiring, training, and managing young workers.		
X		1.2.1.1	If yes to 1.2.1, do young workers perform work that is likely to jeopardize their health or safety, including night shifts and overtime?		
X		1.2.2	Do you employ any workers under the age of 15?		
X	X	1.3	Working hours Rate the strength of and describe the company's practices on working hours, including break times, and what constitutes a normal workday or workweek.		
X	X	1.3.1	Do employees work over 60 hours per week? If yes, describe under what circumstances this would occur.		
X	X	1.3.2	Rate the strength of and describe your policies and practices for legally mandated breaks, holidays, vacation days, and any other legally mandated benefits.		
X		1.3.3	Are workers provided at least one day off every 7 days?		
X	X	1.4	Wages and benefits Rate the strength of and describe in general terms how pay for employees is calculated and what benefits are offered and describe how pay at the facility compares to pay at comparable facilities or for comparable work in the area.		
X	X	1.4.1	Is overtime (OT) paid at a rate greater than regular working rates when worked? Please Describe your overtime payment policy.		
X	X	1.4.2	Are wages deducted for disciplinary reasons?		
X		1.4.3	Are workers provided a wage statement for each pay period?		
X	X	1.5	Humane treatment Rate the strength of and describe the types of disciplinary practices (suspension, termination, withholding of pay, etc.) used at the facility in order to prevent harsh or inhumane treatment including any violence, gender-based violence, sexual or other harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers.		
X		1.6	Non-discrimination Rate the strength of and describe your worker pre-selection process and the selection process for assignments within the facility.		
X		1.6.1	Rate the strength of and describe the criteria used to assign workers to various tasks.		
X		1.6.2	Rate the strength of and describe the process available to employees to bring forth concerns regarding discrimination, harassment, or other employee concerns at the facility without fear of retaliation or retribution.		
X		1.7	Freedom of association Rate the strength of and describe the company's practices with regard to workers' right to associate freely.		
X		1.8	Provide information on any enforcement action brought by a governmental authority within the past five years for alleged labor or human rights violations as described in this section. Explain how the matter was resolved.		
X		1.9	Provide information on any legal proceedings or public campaigns commenced by non-governmental persons or groups for alleged labor or human rights violations as described in this section. Explain how the matter was resolved.		

X = Question Applies to Indirect Suppliers	X = Question applies to On-site Contractor	SECTION 2: Health and Safety	Answer All Questions, unless you are an Indirect Supplier - only answer those noted with "X" in column A and if this is for an On-Site Contractor only answer those noted with "X" in column B.	Rating (per definitions above)	Comments, Particular Strengths and Opportunities, Description of Systems, Examples
X	X	2.0	Describe key aspects and rate the strength of your systems to track and comply with applicable health and safety legal requirements. Attach or provide links to relevant documents or policy.		
X	X	2.1	Occupational Safety Describe key aspects and rate the strength of your systems to manage worker exposure to health and safety hazards (e.g. chemical, electrical, fire, vehicles, noise, fall hazards) and mitigate using the hierarchy of controls. Do your systems/controls include (if yes, provide examples):		
X	X	2.1.1	proper equipment/process design?		
X	X	2.1.2	engineering controls?		
X		2.1.3	administrative controls?		
X		2.1.4	preventative maintenance?		
X		2.1.5	safe work procedures?		
X		2.1.6	occupational health and safety training?		
X		2.1.7	personal protective equipment (free of charge) and associated employee education?		
X		2.1.8	Do workers have a way to raise safety concerns?		
X		2.1.9	Are lighting and temperature appropriate and adequately controlled in the workplace?		
X		2.2	Emergency Preparedness Describe key aspects and rate the strength of your systems to identify and assess potential emergency situations and events, and minimize their impact through emergency plans and response procedures. Do your systems/controls include:		
X		2.2.1	emergency reporting?		
X		2.2.2	employee notification?		
X		2.2.3	evacuation procedures?		
X		2.2.4	worker emergency training?		
X		2.2.5	at least annually executed emergency drills?		
X		2.2.6	appropriate fire detection and suppression equipment?		
X		2.2.7	recovery plans?		
X		2.2.8	Are enough and appropriate fire extinguishers maintained and accessible?		
X		2.2.9	Do you have adequate exit facilities and egress routes?		
X		2.2.10	Are exit doors, stairwells and routes clearly marked and kept free of obstructions?		
X		2.2.11	Do your emergency plans have contact information for emergency responders?		
X		2.3	Occupational Injury and Illness Describe key aspects and rate the strength of your systems to prevent, manage, track and report occupational injury and illness. Do your systems:		
X		2.3.1	encourage worker reporting?		
X		2.3.2	classify and record injury and illness cases?		
X		2.3.3	provide access to necessary medical treatment?		
X		2.3.4	investigate cases?		
X		2.3.5	implement corrective action to eliminate causes of worker injury and illness?		
X		2.3.6	facilitate the return to work?		
X		2.4	Industrial Hygiene Describe key aspects and rate the strength of your systems to identify, evaluate and control industrial hygiene hazards (e.g. chemical exposure, biological and physical agent). Are potential overexposures controlled by the following (if yes, provide examples):		
X		2.4.1	proper design?		
X		2.4.2	engineering and administrative controls?		
X		2.4.3	personal protective equipment (free of charge) and associated employee education?		
X		2.5	Physically Demanding Work Describe key aspects and rate the strength of your systems to identify, evaluate and control worker exposure to hazards of physically demanding tasks (e.g. heavy lifting, repetitive manual tasks).		
X		2.6	Machine Safeguarding Describe key aspects and rate the strength of your systems to evaluate the safety hazards of production equipment and other machinery. Indicate the methods used to control hazards by the following (if yes, provide examples):		
X		2.6.1	physical guards?		
X		2.6.2	interlocks?		
X		2.6.3	barriers?		
X		2.6.4	adequate equipment and safeguard maintenance?		
X		2.7	Sanitation, Food and Housing Describe key aspects and rate the strength of your systems to ensure workers are provided access to adequate sanitation and food facilities. Do you provide:		
X		2.7.1	clean toilet facilities?		
X		2.7.2	potable water?		
X		2.7.3	sanitary food preparation, storage and eating facilities (canteen)?		
X		2.7.4	Are worker dormitories provided? If so, rate your company based upon how they are maintained to be clean and safe. Do they have:		
X		2.7.4.1	appropriate emergency egress?		
X		2.7.4.2	hot water for bathing and showering?		
X		2.7.4.3	adequate lighting, heat and ventilation?		
X		2.7.4.4	reasonable personal space?		
X		2.7.4.5	reasonable entry and exit privileges?		
X		2.7.4.6	individually secured accommodations for storing personal and valuable items?		
X		2.8	Health and Safety Communication Describe key aspects and rate the strength of your health and safety training program for new and existing employees.		
X		2.8.1	Is training provided in employees' primary language?		
X		2.8.2	Is health & safety related information posted in the facility?		
X		2.9.1	Provide information on enforcement actions brought by a local, state or federal agency within the past five years for alleged non-compliance with any health or safety regulation or law at the facility. Explain how the matter was resolved.		
X		2.9.2	Provide information on any legal proceedings or public campaigns commenced by non-governmental persons or groups for alleged violations in regard to health and safety requirements? Explain how the matter was resolved.		

X = Question Applies to Indirect Suppliers	X = Question applies to On-site Contractor	SECTION 3: Environmental	Answer All Questions, unless you are an Indirect Supplier - only answer those noted with "X" in column A and if this is for an On-Site Contractor only answer those noted with "X" in column B.	Rating (per definitions above)	Comments, Particular Strengths and Opportunities, Description of Systems, Examples
X	X	3.0	Describe key aspects and rate the strength of your systems to track and comply with applicable environmental legal requirements. Attach or provide links to relevant documents or policy.		
X		3.1	Environmental Permits and Reporting Describe key aspects and rate the strength of your systems to obtain, maintain and keep current all required environmental permits, approval and registrations. Attach or provide links to your facility's significant environmental permits, or describe why you don't require any. Do your systems include:		
X		3.1.1	tracking of new permit/registration requirements?		
X		3.1.2	ways to ensure that operational and reporting requirements of permits are met?		
X		3.2	Hazardous Substances Describe key aspects and rate the strength of your systems to identify and manage chemicals, waste and other materials posing a hazard to humans or the environment if released. Do your systems address safe (if yes, provide examples):		
X		3.2.1	handling?		
X		3.2.2	movement?		
X		3.2.3	storage?		
X		3.2.4	use?		
X		3.2.5	recycling?		
X		3.2.6	reuse?		
X		3.2.7	disposal?		
X		3.3	Solid Waste and Wastewater Describe key aspects and rate the strength of your systems to manage solid waste (non-hazardous). Do your systems address (if yes, provide examples):		
X		3.3.1	identification?		
X		3.3.2	disposal?		
X		3.3.3	recycling?		
		3.3.4	Describe key aspects and rate the strength of your systems to manage wastewater prior to discharge or disposal. Do your systems address (if yes, provide details):		
		3.3.5	characterization?		
		3.3.6	wastewater monitoring?		
		3.3.7	control?		
		3.3.8	treatment?		
		3.3.9	treatment system performance monitoring?		
X		3.4	Air Emissions Describe key aspects and rate the strength of your systems to manage air emissions (e.g. volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances and combustion by-products). Do your systems address (if yes, provide details):		
X		3.4.1	characterization?		
X		3.4.2	air emission monitoring?		
X		3.4.3	control?		
X		3.4.4	treatment?		
X		3.4.5	treatment system performance monitoring?		
		3.5	Materials Restrictions Describe key aspects and rate the strength of your systems to adhere to materials restrictions based on applicable law (e.g. REACH, RoHS) or 3M requirement (as defined in a contract or product spec). Do your systems address:		
		3.5.1	material restriction compliance in products?		
		3.5.2	substance prohibition or restriction in manufacturing?		
		3.5.3	product labeling for recycling?		
		3.5.4	product labeling for disposal?		
		3.5.5	Mechanism to allow for prompt and accurate reporting if restricted or regulated substances are used to 3M upon request.		
		3.6	Is your company able to provide complete (100%) chemical formulation and composition of the product supplied to 3M? If no, please explain.		
		3.7	Is your company following the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) standards in terms of product labeling and Safety Data Sheets (SDS)?		
		3.8	Storm Water Management Describe key aspects and rate the strength of your systems to manage storm water runoff. Do your systems address:		
		3.8.1	characterization?		
		3.8.2	wastewater monitoring?		
		3.8.3	control?		
		3.8.4	treatment?		
		3.8.5	treatment system performance monitoring?		
		3.8.6	prevention of contamination?		
X		3.8.7	prevention of illegal discharge?		
		3.8.8	spill containment and cleanup?		
X		3.9	Energy Consumption & Greenhouse Gas Emissions Describe key aspects and rate the strength of your systems to track and document your energy usage and greenhouse gas emissions.		
X		3.9.1	Do you know your energy usage and GHG emissions? Are they increasing, decreasing or remaining the same, and why? Please explain.		
X		3.9.2	Do you have a way to find and implement cost-effective ways to minimize energy usage and reduce greenhouse gas emissions? Please explain.		
X		3.10	Pollution Prevention and Resource Reduction Describe key aspects and rate the strength of your systems to prevent pollution and reduce material usage. Do your systems address (if yes, provide examples):		
X		3.10.1	resource use (raw materials, water, energy)?		
X		3.10.2	waste generation (including air and water discharges)?		
X		3.10.3	modification of production, maintenance and facility processes?		
X		3.10.4	material substitution?		
X		3.10.5	conservation?		
X		3.10.6	recycling?		
X		3.10.7	reuse?		

X		3.11	Transportation Describe key aspects and rate the strength of your systems to comply with applicable material transportation laws.		
X		3.11.1	Do you transport Hazardous Materials/Dangerous Goods in the US?		
X		3.11.2	Do you transport Hazardous Materials/Dangerous Goods outside the US?		
X		3.11.3	If no to questions 3.11.1 and 3.11.2, DO NOT RESPONDED TO 3.11.3. If yes to 3.11.1 or 3.11.2, are personnel trained, tested and certified to package, mark, label and ship Hazardous Materials/Dangerous Goods?		
		3.12	Legally Harvested Plant Materials Describe key aspects and rate the strength of your systems to supply 3M with legal and sustainable plant-based materials. Do your systems address:		
		3.12.1	compliance with global laws (e.g. US Lacey Act, EU Timber Regulation)?		
		3.12.2	conformance to 3M Pulp and Paper Sourcing Policy? https://www.3m.com/3M/en_US/suppliers-direct/supplier-requirements/contract-provisions/		
		3.13	Responsible Sourcing of Minerals (aka Conflict Minerals) Describe key aspects and rate the strength of your systems to provide information about tin, tantalum, tungsten and gold (3TG) and other minerals of concern in products you supply to 3M. https://www.3m.com/3M/en_US/suppliers-direct/supplier-requirements/responsible-minerals/ Do your systems provide or require:		
		3.13.1	disclosure of presence of these minerals?		
		3.13.2	ways to provide information on smelters and refiners in your supply chain upon request?		
		3.13.3	reasonable assurance that the minerals you supply do not finance armed conflict?		
		3.13.4	a due diligence management system to address these minerals?		
X		3.14	Provide information on enforcement actions brought by a local, state or federal agency within the past five years for alleged non-compliance with any environmental regulation at the facility. Explain how the matter was resolved.		
X		3.15	Provide information on any legal proceedings or public campaigns commenced by non-agency persons or groups alleging public nuisance or other environmental or health problems. Explain how the matter was resolved.		
X = Question Applies to Indirect Suppliers	X = Question applies to On-site Contractor	SECTION 4: Ethics	Answer All Questions, unless you are an Indirect Supplier - only answer those noted with "X" in column A and if this is for an On-Site Contractor only answer those noted with "X" in column B.	Rating (per definitions above)	Comments, Particular Strengths and Opportunities, Description of Systems, Examples
X	X	4.0	Ethics Describe key aspects and rate the strength of your systems to ensure that your company compliance with all applicable laws and conducts business with the highest ethical standards. Provide links to your relevant Code or policies.		
X		4.1	Business Integrity & Anti-Corruption Describe key aspects and rate the strength of your anti-corruption compliance program. Provide links to your relevant policies. Does your program include:		
X		4.1.1	a prohibition against facilitation payments?		
X		4.1.2	controls that prevent and detect corruptions and violation of law by your third parties, including risk based due diligence and the inclusion of contract terms and condition requiring compliance with laws?		
X		4.1.3	policies and procedures that address gifts, meals or entertainment?		
X		4.1.4	a prohibition against giving gifts in the form of cash or cash equivalents?		
X		4.1.5	an anti-money laundering policy (AML)?		
X		4.1.6	periodic communication to employee about relevant anti-corruption policies, expectations for proper conduct, and locations to raise concerns?		
X		4.1.7	periodic anti-corruption training for employees and relevant third parties?		
X		4.1.8	periodic reviews and testing of the effectiveness of the company's anti-corruption compliance program?		
X		4.2	Conflict of Interest Describe key aspects and rate the strength of your process to prevent, detect and mitigate situations where your employees or third parties, working on your behalf, have actual or potential conflicts of interest with the 3M relationships. Provide links to your relevant policies. Indicate the following:		
X		4.2.1	Is any employee of your company a former employee of 3M?		

X		4.2.2	Is any employee of your company a relative of a current or former 3M employee?		
X		4.2.3	Does any current or former 3M employee have a financial interest or management rights in your company?		
X		4.2.4	Are you aware of any current or former 3M employee who will receive a benefit based on the relationship with your company?		
X		4.3	Disclosure of Information Describe key aspects and rate the strength of your systems to prevent, detect and mitigate the disclosure of false or misrepresented records or conditions related to labor, health and safety, environmental practices, and financial performance? Provide links to your relevant policies.		
X		4.4	Intellectual Property Describe key aspects and rate the strength of your systems to prevent, detect and mitigate the unauthorized transfer of the intellectual property rights of others? Provide links to your relevant policies.		
X		4.5	Fair Business, advertising, and competition Describe key aspects and rate the strength of your process to prevent, detect and mitigate compliance with standards of fair business practices. Provide links to your relevant policies. Does your process address:		
X		4.5.1	the review of advertising and other types of documents which contain claims about your products or services prior to the communication of these claims?		
X		4.5.2	prohibit the cooperation with competitors to fix prices?		
X		4.5.3	the need to safeguard and protect customer information?		
X		4.6	Reporting, protection of identity and non-retaliation Describe key aspects and rate the strength of your processes that allow employees or third parties to raise anonymously concerns, grievances, or questions about violations of law or internal policies. Provide links to your relevant policies. Does your system:		
X		4.6.1	allow for anonymous raising concerns or reporting?		
X		4.6.2	protect employees from retaliation or reprisal for raising concerns or questions?		
X		4.6.3	have reported activity in the past 12 months?		
X		4.7	Privacy & Disclosure of Information Does your company have processes and procedures to prevent, detect and mitigate the privacy expectations of the personal information that is collected, stored, processed, transmitted, and shared? Provide links to your relevant policies.		
X		4.8	Provide information on any investigation, lawsuit or other proceeding during the last five years concerning issues addressed in this Ethics section. Explain how the matter was resolved.		
X = Question Applies to Indirect Suppliers	X = Question applies to On-site Contractor	Section 5: Management System	Answer All Questions, unless you are an Indirect Supplier - only answer those noted with "X" in column A and if this is for an On-Site Contractor only answer those noted with "X" in column B.	Rating (per definitions above)	Comments, Particular Strengths and Opportunities, Description of Systems, Examples
X	X	5.0	Describe key aspects and rate the strength of your overall management system to ensure conformance to the elements of the 3M Supplier Responsibility Code. Attach or provide links to relevant documents or policy. Is your system designed to ensure (if yes, provide examples):		
X		5.0.1	compliance with applicable laws and regulations?		
X		5.0.2	conformance with all elements of the 3M Code?		
X		5.0.3	identification and mitigation of risks related to elements of this Code?		
X		5.0.4	continuous improvement?		
X		5.1	Are senior executives accountable for implementing the management system? If yes, list their titles.		
X		5.1.1	Do the responsible executive and management representatives review the status of your management system on a regular basis? Please describe.		
X		5.1.2	Do you have a process to ensure that enough and qualified personnel are employed at or support the facility to address the topics in this Code? Please describe.		
X		5.2	Do you have a process to identify, monitor and understand applicable laws and regulations, and customer requirements, including the requirements of this Code? Provide specific examples/documentation.		
X		5.3	Do you have a risk assessment and mitigation process for the elements of the 3M Code, customer contractual requirements related to social, environmental, health and safety responsibility? Provide specific examples/documentation.		
X		5.4	Do you have written performance objectives, targets and implementation plans to improve performance against the 3M Code? Provide specific examples/documentation.		
X		5.5	Do you have a training program for new and existing managers and employees for meeting your company policies, regulatory and customer requirements? Provide specific examples/documentation.		
X		5.6	Do you have a process for communicating information about your company policies, practices, expectations and performance to workers, suppliers, and customers? Is the environmental and social responsibility statement posted or available in the facility in the local language? Provide specific examples/documentation.		
X		5.7	Do you have a program to assess employee understanding and obtain employee feedback in regards to meeting your company policies, regulatory and customer requirements? Provide specific examples/documentation.		
X		5.8	Do you have a self-evaluation program to assess overall conformance to your company policies, regulatory and customer requirements? Provide specific examples/documentation.		
X		5.9	Do you have a process for timely correction of deficiencies found by internal or external assessments? Provide specific examples/documentation.		
X		5.10	Do you have processes and controls for ensuring accurate documents and records, and managing confidential information? Provide specific examples/documentation.		
X		5.11	Do you have social and environmental expectations for your suppliers, consistent with the 3M Supplier Responsibility Code? Provide specific examples/documentation.		

Appendix II: Corrective Action & Preventive Action (CAPA)

CAPA - Corrective Action/Preventive Action										
Assessment Date										
Assessor Name										
Type of Assessment										
Attendees: 3M Team										
Attendees: Supplier Team										
Factory Name										
City/State/Province/Country										
Supplier Response Requested by (date)										
3M Input				Supplier Response			3M Verification			
SIQ Question Number	Type of Finding: Enter 0, 1 or 5 <small>Critical=0 Major Finding = 1 Minor Finding = 5</small>	SIQ Question <small>Automatically Populates</small>	Finding Description <small>Automatically Populates (Click to change information to provide more detail if necessary)</small>	CAPA Plans	Responsible person	Est. Completion Date	Date Verified	Result	Comments	Supplier Disposition: 1. Work through CAPA 2. Look for new Supplier 3. Not Qualified 4. No Findings
T2	1	Young workers <small>Describe key aspects and rate the strength of your systems used to verify the age of all workers and compliance with local age restriction laws.</small>	No process in place to verify age of workers	Supplier to Enter	Supplier to Enter	Supplier to Enter	3M Enter Date Verified	In-Process	3M Enter Comments	1 Work through CAPA

Appendix III: List of docs to review

Section 1: Labor Document Requirements

1. Employee Manual
2. Labor contracts
3. Applicable local agency approval related to Labor (e.g., wages approval, Special OT approval etc.)
4. Procedure for verifying the age of workers
5. Wage and hours of work (pay slips, overtime records)
6. Progressive discipline process or any database for enforcing discipline
7. Reports showing calculations of Over Time
8. Payment receipt of social insurance schemes
9. Hiring procedure
10. Promotion, performance assessment procedure
11. Pay & wages system, Overtime payment, payment term procedure
12. Child Labor, minimum hiring age, procedure to ensure no violation
13. Feedback procedure / channel for employee to feedback their concern

Section 2: Health & Safety

1. Safety policy
2. Workplace risk assessment document (e.g., job hazard analysis, the potential hazard, what control measure and PPE etc.)
3. Hazardous material/chemical permit (if applicable)
4. Emergency response procedure
5. First aid training record / or First aide certificate
6. Fire drill record (and other drill record if applicable) or others emergency response training (like earthquake etc.)
7. Workplace EHS inspection record
8. Workplace Injury record / Illness logbook for current year
9. Employee exposure assessment report (Hearing test result, personal chemical exposure result, employee medical surveillance results etc.)
10. Workplace hazard assessment report (Noise area monitoring report, chemical area sampling etc.)
11. Machine Preventive maintenance records (1 – 2 examples)
12. Hazardous material inventory
13. Health and Safety Communication
14. EHS related training record

Section 3: Environment

1. Environmental Policy
2. ISO14001 Certificate
3. Environment permit/license
4. Hazardous waste inventory
5. Waste handling procedure (waste segregation, disposal, labelling etc.)
6. Record of waste disposal
7. Records of monitoring, inspections and maintenance required by environmental permits
8. Energy/Water or Waste reduction plan/program

9. Pollution prevention and reduction plans and results
10. GHG initiatives and tracking of scope 1 and scope 2 emission
11. Product information (e.g., RoHS, REACH, WEEE, Pulp & Paper Certification, Responsible Minerals declaration etc.)
12. Responsible sourcing of minerals and/or Pulp & Paper policy/procedures

Section 4: Ethics

1. Business conduct guidelines / Code of Ethics
2. Employee Code of Ethics training record

Section 5: Management System

1. Company/facility's Policy or commitment statement related to ESG program.
2. Management system certification (e.g., SA8000, ISO 9001, etc.)
3. ESG program performance objectives and implementation plans and measures record
4. Company Corrective & Preventive Action procedure
5. Supplier Management related documents (Supplier selection, assessment etc.)
6. Worker Feedback and Participation record. Legal compliance records of citations, penalties for violations of labor / ethics / EHS laws or complain
7. and regulations Supplier ESG Expectation (e.g., Supplier Code of Conduct/Policy, Contract etc.).

Section 6: Others

1. Company Business License
2. Facility lay out and floor plan
3. Description/diagram of process
4. Canteen / Food provider License or Permit