

# Forest Products Sourcing Policy

## Applies To

This policy applies to direct (tier one) and indirect (upstream) suppliers in the 3M supply chain that provide pulp, paper, solid wood and paper-based packaging, and cellulosic fibers such as those used to make viscose, and rosins and resins.<sup>1</sup>

*Since 2015, 3M's Pulp and Paper Sourcing Policy has applied to all 3M suppliers of pulp, paper, viscose and paper-based packaging. In 2022 this policy was expanded into the current scope and renamed the Forest Products Sourcing Policy. This policy will henceforth replace the Pulp and Paper Sourcing Policy.*

## Introduction

At 3M, we have long recognized our responsibility to conserve natural resources and support a sustainable environment. We are committed to using our innovation, passion, and expertise towards improving every life. This commitment is a part of our vision for the future and central to [our values](#). We are also committed to working with customers, suppliers and other business partners that share these core values. Our [Code of Conduct](#) and longstanding [Environmental Policy](#) serve as the foundation for our environmentally responsible sourcing commitments, and set the expectation for suppliers to ensure they provide products and services in accordance with the 3M [Supplier Responsibility Code](#). This policy specifically addresses 3M's commitment to the responsible sourcing of forest products.

3M is committed to sustainable forest management and the conservation of natural resources. 3M recognizes its responsibility to source forest products from suppliers that share these goals and are committed to providing products from sustainably managed forests.

The United Nations describes sustainable forest management as “[a] dynamic and evolving concept [that] aims to maintain and enhance the economic, social and environmental values of all types of forests, for the benefit of present and future generations.” This description aligns with [3M's sustainability vision](#), and recognizes the need to continually evaluate, adjust and advance global practices and programs in support of sustainable forestry. We at 3M believe that a variety of robust, flexible and evolving systems and tools used by people and organizations across the forestry value chain are the best way to achieve sustainable forest management. We commit to continually assess new knowledge and information in order to advance our own policy, standards and requirements, and to help others in the supply chain to do the same.

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<sup>1</sup> This scope of products will be referred to throughout the document as “forest products”

Our expectation is that our suppliers and their supply chains make reasonable but timely progress in building the necessary capacity, systems and tools to conform to this Policy. Through this Policy, 3M's goal is to do our part to continue to move the global forest products supply chain toward sustainability, by working in collaboration with our suppliers and, when necessary, choosing not to work with a supplier who is not willing or able to meet Policy expectations.

## Requirements

- I. 3M expects that all forest products from its suppliers contain materials that are legally harvested, sourced, transported and exported from its country of origin. 3M also expects that its forest products suppliers will work to assure and verify that virgin wood fiber and plant-based fiber provided to 3M is:
  - Traceable through the supply chain back to the forest source.
  - Harvested in a manner that maintains and/or enhances High Conservation Values (HCVs), including but not limited to peatland ecosystems, Intact Forest Landscapes (IFLs), and old growth forests.
  - Free of deforestation, meaning not from areas where natural forests are being converted to other land uses or plantations after March 5, 2015. The High Carbon Stock Approach (HCSA) should be used where applicable.
  - Obtained in a manner that respects the rights of indigenous peoples and local communities to the ownership and control of their titled or customary lands and resources, including their right to give or withhold their Free, Prior and Informed Consent (FPIC) to proposed developments impacting their lands or resources.
  - Obtained in a manner that respects the rights and safety of workers, including no forced or child labor, no employment discrimination, and the freedom to associate (consistent with the [3M Supplier Responsibility Code](#)).

As appropriate, and commensurate with 3M's position as a downstream company in the supply chain, 3M may provide assistance to suppliers and/or sources of harvest in higher-risk regions to assess or build their capacity to meet these criteria.

- II. All suppliers of forest products made from wood fiber or plant-based fiber are expected to:
  - Implement policies and programs consistent with the 3M [Supplier Responsibility Code](#) on Labor/Human Rights, Safety & Health, Environment, Ethics and Management Systems.
  - Maintain and provide to 3M upon request information required by legal harvesting laws, including genus, species and country of harvest.
  - Maintain and provide to 3M upon request information regarding the full traceability of the virgin fiber supply chain back to the source of the harvest, including identification of the mill(s) and third-party certifications of materials and operations in their supply chain.
  - If suppliers do not have the information requested by 3M, suppliers are expected to work promptly with their suppliers to obtain this information and provide it to 3M.

- III. In order to advance responsible sourcing practices, all suppliers of forest products are expected to make reasonable but timely progress in developing and implementing:
- Policies and due diligence management systems for the sourcing of forest products, and to develop methods of requesting that their suppliers do the same.
  - A verifiable, documented system to establish traceability of the virgin fiber supply chain back to the forest source, including identification of each actor in the supply chain including all mills.
  - Ongoing training/communications on the concepts of this Policy and related topics to their relevant employees and suppliers, as appropriate.
  - A transparent, responsive, and effective grievance mechanism to resolve all complaints and conflicts, and remediate policy violations without fear of retaliation.
- IV. Recognizing that factors such as integrity, quality, service, and competitive price are relevant in deciding whether to purchase products covered by this Policy, 3M will also consider information from suppliers regarding the following sustainable management practices, and use that information as a factor for preference in selection and retention:
- Practicing responsible forest management, including scientifically credible ecosystem-based management, comprehensive forest planning, minimizing impacts of road building and logging, protection of water resources and watershed areas, protection of soil health, support for local communities, and responsible chemical usage.
  - Assessing management practices at the forest source and/or mill level, in order to verify that supplied forest products conform to Policy expectations.
  - Actively supporting smallholders among their sources of harvest, including work to improve livelihoods and/or help them conform with this policy.
  - Providing knowledge-building opportunities for relevant suppliers and contractors to advance responsible sourcing and sustainable forest practices.
  - Minimizing mill impacts on human health and the environment, including but not limited to energy usage, air emissions, water discharges, and bleaching processes.
  - As appropriate, participating in associations or multi-stakeholder groups focused on improving forestry practices and knowledge of sustainable forestry.
  - Participating in or financing landscape programs and forest conservation initiatives, including supporting enhanced agroforestry, reforestation or restoration of natural ecosystems.
  - Ensuring waste is prevented, reused, recycled, recovered and/or disposed of in an environmentally sustainable way.
- V. In addition, 3M encourages its suppliers to bring to 3M ideas for collaborative initiatives to advance the goals of sustainability and sustainable forest management, such as:
- Optimizing the mix of recycled and virgin fiber in materials supplied to 3M, in order to maximize sustainability attributes while maintaining or enhancing product performance.
  - Enabling the ready recyclability of 3M products and packaging.
  - Developing products and packaging for supplied materials and 3M products that use fiber inputs efficiently, including through redesign, reuse, and material choice.

- Utilizing non-wood plant fiber or forest/agricultural byproducts, taking into account the sustainability attributes and impacts of alternatives in comparison to traditional fibers from responsibly managed forests.
- Utilizing alternatives to or recycled options for wooden crates and pallets used for shipping and packaging.

## Policy Implementation

Using a phased approach, 3M will verify supplier conformance to this Policy and work to continually improve responsible forest products sourcing within its supply chains by taking the following actions:

- Implementing a due diligence program to demonstrate compliance with applicable legal harvest-related laws and regulations and the commitments in this Policy.
- Evaluating potential new suppliers during the supplier qualification process for the capacity to conform to this Policy.
- Seeking Policy-related contractual or other commitments with suppliers.
- Using a prioritized and risk-based protocol to:
  - periodically review supplier conformance with the requirements of this Policy.
  - obtain information from suppliers verifying traceability throughout the supply chain back to forest source for products provided to 3M, including materials furnished by their suppliers.
- Building supplier awareness of these Policy expectations through measures such as supplier-facing website communications and supplier education or training.
- Monitoring and resolving complaints, conflicts and grievances through a transparent, responsive and effective [grievance mechanism](#).
- Using 3M's established corrective and preventative action process as necessary with suppliers who are not meeting, or working towards meeting, the requirement of this policy.

3M will also look to collaborate with other companies and organizations, as appropriate and relevant to the 3M supply chain, to progress on the following actions:

- Monitoring for deforestation in higher-risk areas, including the use of geographic information and/or satellite monitoring in areas where deforestation or forest degradation may be occurring.
- Participating in credible, landscape-level programs where these exist.

Verifying elements of this policy through second or third-party organizations through various means, such as field assessments, satellite monitoring, grievances, etc.

## Policy Review, Transparency & Reporting

3M commits to regular Policy updates, transparency and public reporting of its progress in implementing this Policy by:

- Reviewing this Policy at least every three years in light of evolving science and social considerations associated with sustainable forestry and responsible sourcing of forest products.

- Updating its suppliers on changes to this Policy and on major developments regarding 3M's expectations for responsible sourcing practices in its forest products supply chains.
- Setting key objectives and targets for performance against this Policy.
- Inviting and reviewing stakeholder input on responsible sourcing of forest products and our progress under this Policy.
- Regularly reporting its progress in implementing this Policy on the 3M [Sustainability website](#).

#### **Related Information**

[Forest Products Sourcing Policy Conformance Guidance](#)