

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

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I. Introduction

3M utilizes various Non-Employee classifications (hourly/daily, contingent deliverable, outsource service and independent contractors) as one part of its overall workforce strategy (for simplicity, this document refers to all non-employee classifications as "Non-Employee."). A Non-Employee is a worker employed or engaged by another organization or company, such as a temporary employment agency, or who is on temporary assignment at 3M. The third-party organization or company is the employer of the Non-Employee (hereinafter "Supplier" or "Seller"). The 3M Assignment Contact is the 3M employee responsible for the Non-Employee assignment and/or Supplier relationship ("hereinafter "3M Assignment Contact").

In order to promote a productive, safe, and secure work environment at 3M locations, and to comply with various laws, regulations, and 3M policies, 3M has established certain pre-assignment requirements ("Requirements") for Non-Employees and Suppliers.

II. Scope of Coverage

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

III. Non-Employee and Supplier Requirements

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

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

Policies on-Employees must review and follow while on assignment

3M Non-Employee Code of Conduct Certification

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

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

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

Physical Access Control Policy

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

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

System Access Control Standard

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

3M Policies

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

Other Supplier Obligations

Sanctioned Parties list

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

Unique ID

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

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

Age Verification

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

Background Screening

3M is committed to taking reasonable steps to ensure that it appropriately protects its people, property, and information. As the employers of Non-Employees, Suppliers are solely responsible for performing background screening in accordance with 3M's general security and access-related requirements, and will do so, prior to any Non-Employee receiving unescorted access to 3M facilities and/or 3M systems during their assignment at 3M. 3M reserves the right to decline assignment of any Non-Employee worker based on the Supplier's pre-assignment background screening results, in accordance with applicable law.

A new background screen will be required for Non-Employees with a break in 3M assignment of six months or greater. If a Non-Employee begins an assignment through a new Supplier-employer, the new Supplier will be required to initiate all onboarding requirements, including a new background screen, regardless of any break in 3M assignment.

- Suppliers will verify that the Non-Employee's social security number is both valid and active as defined by the U.S. Social Security Administration. Suppliers will utilize the social security number to conduct federal, national, and county specific criminal background search for the previous seven years.
- County searches must include all counties in which the Non-Employee lived during the immediately preceding seven years. To the extent 3M reviews the results of such searches, it will do so in compliance with applicable law. If Non-Employee has lived in a non-US jurisdiction at any time during the immediately preceding seven years, Seller will also conduct criminal background checks in those jurisdictions to the extent the law in such jurisdictions allows.
- Suppliers will also complete a National Sex Offender Registry check as part of their criminal background search.
- A minimum requirement as stated within the Contingent Workforce Solution's Beeline request that all Manufacturing, Warehouse & Maintenance contingent positions require a valid High School Diploma or G.E.D.
- **Non-Production Verification Requirements:** If the education requirement is unverifiable by the background screening vendor or remains in process after 10 business days, the Supplier may seek a waiver using the 3MCWS@hays.com for a decisional. If waiver is granted, the Non-Employee will be allowed to begin their assignment. If the education verification results are returned with negative information, the Supplier must notify the MSP immediately and the Non-Employee will be removed from their assignment within 24 hours.

- Any education results that are pending after 30 days must be sent to 3MCWS@hays.com for decisional review.

Pre-assignment background results that demonstrate any Felony level convictions and/or pending charges within the last 7 years from the proposed date of assignment should be sent to 3M for review. Such results are not an automatic bar to assignment at 3M and 3M will review the results in compliance with applicable law. In addition to Felony level convictions and/or pending charges, 3M requests that Suppliers also forward for review results that indicate:

1. Any conviction or pending charge (regardless of level) involving drugs, theft, violence, Information Technology theft & domestic crimes in the last 7 years. The review period is 7 years from the proposed date of assignment, but if the proposed Non-Employee has been incarcerated at any time for the past 7 years, the review should go back an additional amount of time equal to the amount of time that the individual was incarcerated. (For example, if the individual was in jail for the last three years, the review period is ten years—seven years plus an additional three years)
2. Any conviction or pending charge for a driving offense regardless of level, but only if the proposed Non-Employee will have responsibilities that include driving while performing services for 3M
3. Any background results that establish a pattern of criminal convictions, defined as three or more criminal convictions and/or pending charges during the seven-year period of review
4. If worker is listed on sex offender registry

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

For those backgrounds requiring further review by 3M, please send the following information directly to 3MCWS@hays.com:

- Proposed Non-Employee's Full Legal Name. (Please remove any additional personal identifying information such as SSN, date of birth, address, etc.)
- Non-employee assignment (i.e., the assignment title) for which the proposed Non-Employee is being considered
- Physical location for which the Non-Employee is being considered
- Full background screening reports- Partial background screening reports will not be accepted

Debarment Check Requirements

FDA Debarment List Check finds records of criminal conduct, relating to development or approval of a drug product, that prevent an individual from engaging in similar activities. It is intended to help organizations comply with regulations relating to drug applications and related activities. It supports FDA approval decisions by allowing organizations to certify their compliance with regulations and helps to ensure confidence and trust in the drug approvals process.

Suppliers are required to complete pre-assignment Debarment Checks on Non-Employees supporting 3M's Health Information Systems (HIS), Health Care Business Sponsor, and/or Medical Solutions Business Group.

Drug Screening

Suppliers will perform the drug screen per [3M's Drug Screening Requirements](#). A third-party supplier will perform this service for Independent Contractors to the extent Independent Contractors don't already have a business-to-business arrangement to facilitate this Requirement. Only Non-Employees who meet 3M's drug screening requirements are eligible for assignment. A drug screen is required for on-site Non-Employees that are working with a non-escort (i.e. yellow) badge in assignments associated with specific functional assignment responsibilities and/or for Non-Employees assigned to certain locations. Please see decision tree below.

Job Location/Family	PPE/Drug Screen Requirement
Manufacturing Site	PPE/Drug Screen Required
Distribution Center	PPE/Drug Screen Required
3M Center & Job Family = Aviation, Engineering, Health Safety and Environment, Laboratory / Technical, Manufacturing, Medical Services, Quality, Technical Service	PPE/Drug Screen Required
3M Center & Job Family = Administration, Communications, Contract Management, Customer Service, Design, Finance and Accounting, General Business Management, Human Resources, Information Technology, Legal, Logistics, Marketing, Packaging, Public Relations / Affairs, Purchasing, Security, Service, Supply Chain, Training	No PPE/Drug Screen
3M Austin Center & Job Family = Aviation, Engineering, Health Safety and Environment, Laboratory / Technical, Manufacturing, Medical Services, Quality, Technical Service	PPE/Drug Screen Required
3M Austin Center & Job Family = Administration, Communications, Contract Management, Customer Service, Design, Finance and Accounting, General Business Management, Human Resources, Information Technology, Legal, Logistics, Marketing, Packaging, Public Relations / Affairs, Purchasing, Security, Service, Supply Chain, Training	No PPE/Drug Screen
Health Information Systems (HIS) - Entering Medical Facilities or Sales (Cost Centers: 400138, 400216, 480813, 500146, 500170, 500326, 500329, 500840, 500860, 500885, 712285, 712921, 712927, 912933, 747386, 747609, 748024, 748025, 801179, 801209, 801338, 808941, 816070)	PPE/Drug Screen Required
HIS - Not entering Medical Facilities and not Sales	No PPE/Drug Screen Required
Inside Sales	No PPE/Drug Screen Required
Fields Sales or Sales roles visiting customers	PPE/Drug Screen Required
3M KCI Advantage Centers, San Antonio & Dillon, MT Job Family = Administrative, call center, billing, collections	No PPE/Drug Screen
3M KCI Field Service Technicians	PPE/Drug Screen Required
3M San Antonio	No PPE/Drug Screen

A new drug screening must be completed for Non-Employees with a break in 3M assignment of six months or greater.

Off-site Non-Employees who are granted systems access only are not required to complete a drug screening. Non-Employees in Delivery Driver, Offsite Third-Party Worker and Volunteer assignments may be exempt if their access to 3M facilities or corporate systems is limited.

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

Verification of Work Authorization

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

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

Former 3M Employees and/or Former Non-Employees

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

Former 3M employee or former non-employee statuses requires further review by 3M, please send the following information directly to 3MCWS@hays.com:

- Proposed Non-Employee's Full Legal Name. (Please remove any additional personal identifying information such as SSN, date of birth, address, etc.)
- Non-employee assignment (i.e., the assignment title) for which the proposed Non-Employee is being considered
- Physical location for which the Non-Employee is being considered
- Submit relevant details pertaining to the Conflict of Interest

Conflict of Interest:

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

For those Non-Employees with potential Conflicts of Interest requiring further review by 3M, please send the following information directly to 3MCWS@hays.com:

- Proposed Non-Employee's Full Legal Name. (Please remove any additional personal identifying information such as SSN, date of birth, address, etc.)
- Non-employee assignment (i.e., the assignment title) for which the proposed Non-Employee is being considered
- Physical location for which the Non-Employee is being considered
- Submit relevant details pertaining to the Conflict of Interest

Former or Current Government Employee

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

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

For those Non-Employee potential Conflict of Interests related to being a former/current Government Employee requiring further review by 3M, please send the following information directly to 3MCWS@hays.com:

- Proposed Non-Employee's Full Legal Name. (Please remove any additional personal identifying information such as SSN, date of birth, address, etc.)
- Non-employee assignment (i.e., the assignment title) for which the proposed Non-Employee is being considered
- Physical location for which the Non-Employee is being considered
- Submit relevant details pertaining to the Conflict of Interest

V. Requirements that apply to specific Non-Employees only

Non-Employees who support Export Control issues

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

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

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

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

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

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

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

UPDATE: If Medical Surveillance requirements are applicable, the Supplier must ensure the Non-Employee completes the required exams and must further provide the completed certifications to the 3M location's HR Representative prior to the commencement of the Non-Employee's assignment.

Non-Employees assigned to mining operations

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

Non-Employees providing on-site or other covered services to Medicare and Medicaid Certified Facilities (CMS Rule), and/or who travel to or work at customer sites subject to a federal, state, local, government contractor, or other COVID-19 vaccination mandate during assignment at 3M

Many 3M HCBG customers are required to comply with the CMS Rule by ensuring that individuals who **work on-site at their facilities are vaccinated or have an approved exemption**. Some 3M HCBG customers have independently required that those who come onsite to their facilities be fully vaccinated and/or boosted as well.

If the assignment the Non-Employee occupies requires travel to non-3M locations with vaccine mandates, travel within jurisdictions that require vaccinate mandates, or work supporting Government contracts with jurisdictional requirements, the Supplier will also be required to confirm the Non-Employee's COVID-19 vaccination status or confirm the Non-Employee has an approved exemption prior to start. Suppliers are required to be up-to-date on any and all vaccine mandates that are issues in jurisdictions across the country and Suppliers must promptly comply with those mandates as they are issued.

Although the current rules might not require boosters, **certain 3M customers may define fully vaccinated as inclusive of boosters, too**. Should 3M customers require boosters, our Suppliers will be required to verify applicable Non-Employees are fully up to date in order to continue the assignment and/or be cleared for assignment placement. Verification of vaccination status comes in various forms, please confirm with 3M customers the vaccine verification that is needed for each of the Non-Employees. If Non-Employees do not meet any such customer requirements applicable to the assignment, the assignment and/or Non-Employee status would be reviewed for next steps.

3M Assignment Contacts and/or Hays representatives will notify Suppliers during the initial request for augmented worker support if the CMS rule or a customer, a private employer mandate, jurisdiction-based government contract, or other COVID-19 vaccination requirement applies. Non-Employee(s) will be able to request an accommodation through their Supplier employers using the [Augmented Workforce Accommodation Notice and Request](#) posted on the 3M Supplier Direct website.

There may be state laws that provide exemptions from employer vaccination policies. If your employee lives and works in one of these locations, please email covidaccommodation@mmm.com or discuss with your Hays representative.

3M Non-Employee Compliance Audit Matrix

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

DOCUMENT TITLE	ALL U.S. WORKERS	REQUIRED BASED ON ROLE	IF AUDITED, PLEASE RETURN
3M Non-Employee Code of Conduct Certification	X		Signed copy of document
3M Policies	X		Signed copy of document (last page only)
Seller Personnel Agreement (Confidentiality Agreement)*	X		Signed copy of document - *If providing a signed copy of The Seller Personnel Agreement, the Privacy Notice & Consent Regarding Personal Information Transfer and Storage Form is NOT required.
Beeline Data Privacy & Consent	X		Signed copy of document
Sanctioned Parties List Verification	X		Verification on your company's letterhead that your company has verified the worker does not appear on any Prohibited Parties Lists
Beeline Unique ID	X		Verification on your company's letterhead confirming that you have provided the CWS Team with the worker's legal first name, middle initial, birth month & birth day to make up the Unique ID

Age Verification	X		Verification on your company's letterhead confirming that the worker is 18 years of age or older (no other documentation required)
Physical Access Control Policy	x		Signed copy of document
System Access Control Standard	x		Signed copy of document
Work Authorization Verification		X	Verification on your company's letterhead confirming that your company has verified the worker's authorization to work
Background Screen: federal, national & county & criminal 7 year screen, education, sex offender registration & driving record verification (if applicable)		X	Provide a copy of the original background screening result (please block out any worker personal data including SSN, etc.). For any decisional backgrounds, please provide documentation of 3M's approval.
Drug Screen		X	Provide a copy of the original drug screening result (please block out any unneeded worker personal data including SSN, etc.)
Conflict of Interest		X	Provide a copy of signed documents and the email confirmation from CWS/COI team indicating that the worker is clear.
Export Control		X	Provide a copy of signed Export Control template verifying worker's citizenship status and Country of birth
MESP		X	Records retained by 3M
Medical Surveillance		X	Records retained by 3M