

3M Deutschland GmbH

German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz) Self-Declaration and Policy Statement

Executive summary:

At 3M Company (3M), we share our customers' commitment to legal and ethical business practices around the world.

3M is a global leader that helps support a safe, sustainable, healthy and bright world, for everyone. Our Purpose drives our culture, which in turn drives our innovation model leading to strong performance and growth.

3M has been named the World's Most Ethical Company[®] by the Ethisphere Institute for nine consecutive years. This award reflects our ongoing commitment to maintaining the highest ethical and compliance standards in our business practices. 3M has also been a participant in the United Nations Global Compact since 2014. 3M publishes its Code of Conduct [Ethics & Compliance | 3M United States](#) in 22 languages and invests extensive resources in programs designed to help our employees understand and follow our Code of Conduct. One of 3M's core principles of business conduct is compliance with applicable laws wherever 3M does business. 3M also has a [3M Supplier Responsibility Code](#), which outlines 3M's foundational expectations of its suppliers in the areas of labour, environment, health and safety, ethics and management systems. Conformance with this Code is required to become or remain a supplier to 3M anywhere in the world and for any supplied materials or services.

The following Self-Declaration and Policy Statement describes the basic principles of 3M Deutschland GmbH with regard to their fulfilment of obligations according to the Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, "SCDDA").

Introduction

Responsible, sustainable, ethical and lawful action is one of the key 3M cultural elements and principles and is firmly anchored in the 3M corporate strategy and the 3M Code of Conduct. This includes appropriate compliance with human rights and environmental due diligence requirements in accordance with the Supply Chain Due Diligence Act.

Just as sustainability is embedded in our promise to improve lives by helping solve the world's greatest challenges, sustainable thinking is embedded into the core of 3M and in the strategic planning process we use for every business it is part of the corporate culture and tradition. As a concept with ecological, social and economic importance, sustainable action and corporate responsibility have been continuously developed within 3M for decades.

The 3M Environmental Policy, created in 1975, established the framework for environmental management and conservation of resources, emphasizing prevention of pollution at the source. We work to identify potential risks to the environment as well as to the health and safety of our employees and communities, and we take steps to modify processes, product design, and standards to address these risks. We leverage information and technology to assess the risks and drive compliance through data systems and technical analysis. Since 1988, 3M has defined global, quantitative targets for reducing emissions to water, air and soil, which are updated on an ongoing basis. Programs for the more efficient use of raw materials and energy complement this strategy. The successes are measurable: In the last twenty years, for example, Scope 1 and Scope 2 location-based CO₂ emissions have been reduced by more than 75 percent. 3M has supported the Paris Agreement since its inception and incorporated the 2018 findings of the Special Report on Global Warming of 1.5°C by the Intergovernmental Panel on Climate Change (IPCC) into our goals, operations, and actions.

3M's activities are not limited to environmental stewardship in the traditional sense. For the company, sustainability is only ever conceivable as a holistic approach. That is why 3M combines environmental, social, and governance programs, initiatives and activities with the standard to act responsibly beyond legal requirements. In the process, the environment, economy and society are equally important elements. 3M has always been a purpose-driven company. We unlock the power of people, ideas and science to reimagine what's possible. The power comes from connecting purpose to our performance

1. Ethical action as a basic principle

Our success is based on long-term trust - business partners, customers, and suppliers have trusted 3M for decades. Maintaining and expanding this trust is a fundamental principle of the company. It is based on more than just innovative products - namely on a clear basic approach on the part of 3M, which provides for ethical business conduct at all times. This philosophy is expressed in the corporate culture, which is based on respect and trust, as well as in the 3M Code of Conduct, which applies to 95,000 employees in over 70 countries and stands for a corporate culture characterised by ethical behaviour. 3M also ensures that its suppliers share its commitment to maintaining compliant, responsible, and sustainable operations and practices through adherence with the 3M Supplier Responsibility Code. We expect our suppliers to enforce these expectations with their own suppliers, thereby promoting our high sustainability standards through our supply chains.

The 3M Sustainability Reporting, related Policies, Standards, Our Code of Conduct, and Supplier Responsibility Code can be found using the following link:
https://www.3M.com/3M/en_US/sustainability-us/annual-report/

The following declaration in accordance with the SCDDA refers to the German branches of 3M Deutschland GmbH and describes the human rights strategy with regard to the SCDDA risks. This Policy Statement is published.

2. Obligations according to the Supply Chain Due Diligence Act

The duty of care in the supply chain and SCDDA risks (SCDDA risks) are subject to a large number of German legal requirements and regulations¹. This Self-Declaration and Policy Statement describes the subject-specific requirements for 3M Deutschland GmbH; it does not represent any obligation of 3M Deutschland GmbH towards its customers or business partners or suppliers or employees that goes beyond the interface regulation; 3M Deutschland GmbH does not assume any additional responsibility, liability, indemnification obligations or the like towards them. Incidentally, this Self-Declaration is not a contract, in particular not a contract in favour of third parties and also not a contract with a protective effect in favour of third parties. Until further notice, this Self-Declaration also applies as a Policy Statement in accordance with section 6 (2) SCDDA; however, the Policy Statement will be updated shortly and created as an independent document, since the findings and developments from the date of validity of the SCDDA will be incorporated.

The German activities of 3M Deutschland GmbH fall within the scope of the German Supply Chain Due Diligence Act (SCDDA), which prescribes due diligence with focus on the following human rights and environmental risks ("SCDDA risks").

M1 Prohibition of child labour

M2 Prohibition of forced labour and all forms of slavery

M3 Failure to comply with occupational health and safety and work-related health hazards

M4 Failure to respect freedom to form a coalition - freedom of association and the right to collective bargaining

¹ Supply Chain Due Diligence Act (LkSG) [\[Link German version\]](#) | Supply Chain Due Diligence Act (SCDDA) [\[Link to English version\]](#)

M5 Prohibition of unequal treatment in employment
M6 Prohibition on withholding adequate wages
M7 Destruction of the natural livelihood through environmental pollution
M8 Unlawful violation of land rights
M9 Prohibition on hiring or using private/public security forces that could lead to impairments due to a lack of instruction or control
M10 The prohibition of an action going beyond the above or an omission of a breach of duty, which is directly capable in a particularly serious way to impair a protected legal position (resulting from the human rights agreements as defined in section 2 (1)) and whose illegality is obvious after a reasonable assessment of all relevant circumstances

U1 Prohibited manufacture, use and/or disposal of mercury (Minamata Convention)
U2 Prohibited production and/or use of substances within the scope of the Stockholm Convention (POP) and non-environmentally sound handling of waste containing POPs
U3 Prohibited import/export of hazardous waste as defined in the Basel Convention

3. Expectations

3M Deutschland GmbH expects its employees and its suppliers in the supply chain within the meaning of the SCDDA to support 3M's commitment to ethical business conduct and integrity in order to identify the human rights and environmental risks and violations described in the SCDDA and to guard against them in an appropriate manner (or prevent them) and, if necessary, to stop or minimise them.

This applies in particular to the priority areas of human rights and environmental risks. It is expected that the employees of 3M Deutschland GmbH and their suppliers in the supply chain support 3M in risk management, risk analysis, preventive and remedial measures and the complaints procedure within the meaning of the SCDDA; this applies to 3M Deutschland GmbH's own business area and its supply chain within the meaning of the SCDDA and is expressed in this regard, for example, in the 3M Code of Conduct and the 3M Supplier Responsibility Code.

4. Procedure

3M Deutschland GmbH has a proven management system. This consists of specifications for the management of the organisational units, regulation management, risk management, an internal control system and a compliance management system. In addition, relevant instructions are in place.

The requirements of the Supply Chain Due Diligence Act, in particular risk management, are woven into it in terms of personnel, processes and documentation. Annual and event-related risk analyses are carried out in our own business area and in the supply chain in accordance with the instructions and regulations of the SCDDA.

The results are appropriately weighted and prioritised. Preventive and remedial measures according to the SCDDA are assigned to the prioritised risks. Their effectiveness is checked annually and as required and updated if necessary. In accordance with the legal requirements, 3M Deutschland GmbH also includes indirect suppliers in the analyses and measures mentioned. This applies in particular if 3M Deutschland GmbH has actual indications that a violation of a human rights-related or environmental obligation appears possible at an indirect supplier (substantiated knowledge). 3M and thus also 3M Deutschland GmbH maintain a legally compliant complaints procedure.

3M Deutschland GmbH will check the fulfilment of the duty of care in accordance with the law, update and document and report if necessary. 3M Deutschland GmbH with all of its business premises adheres to the obligations arising from the SCDDA in relation to SCDDA risks.

4.1. Risk analysis in accordance with the SCDDA

3M Deutschland GmbH carries out a risk analysis in accordance with SCDDA. Here, customers and contractors are informed on a need-to-know basis in accordance with the 3M interface rules (see below).

4.2. Priority risks

3M Deutschland GmbH carries out the risk analysis continuously and ad hoc in accordance with the legal requirements, in particular with regard to appropriate weighting and prioritisation. This Statement will be reviewed and updated accordingly.

4.3. Preventive and remedial measures according to SCDDA

3M Deutschland GmbH has preventive and remedial measures in accordance with the SCDDA. These are applied in particular in our own business areas and in relation to our direct suppliers.

4.4. Treatment of indirect suppliers according to SCDDA

3M Deutschland GmbH treats indirect suppliers in accordance with the SCDDA. Customers and contractors are informed on a "need-to-know" basis in accordance with the 3M interface rules (see below).

4.5. Complaints procedure in accordance with the SCDDA

3M Deutschland GmbH has a complaints procedure in place in accordance with the SCDDA.

4.6. 3M interface rules

3M Deutschland GmbH will comply with the human rights and environmental expectations required by the SCDDA and address them appropriately within its supply chain. 3M Deutschland GmbH will also support the customer in its risk management, risk analysis, prevention, remedy and complaints procedures in its own business area and in relation to its direct and indirect suppliers to the extent required (in particular to the extent required by law, the appropriateness and effort targets).

3M Deutschland GmbH will answer the legitimate questions of the customer as best as possible; in the process, business secrets of 3M are protected and are not to be disclosed. 3M shall determine, at its sole discretion, what is a trade secret (this applies in particular to intellectual property, know-how, designs, processes and methods, recipes, contents, materials, calculation components, countries of origin, regions, suppliers, customers, names, addresses, telephone numbers). 3M Deutschland GmbH shall inform the customer about its own business area and the supply chain of 3M on a need-to-know basis with consideration of appropriateness and legal obligation. In justified cases, the customer is given the opportunity to be audited, whereby the subject, intensity, duration and frequency must be agreed with 3M. According to this stipulation, 3M Deutschland GmbH can also only allow such audits in justified cases and generally only to third parties who are obliged to neutrality and confidentiality. 3M Deutschland GmbH decides at its sole discretion which certifications it seeks, maintains and awards.

4.7. Reporting obligation

3M Deutschland GmbH will continuously document the fulfilment of the stated obligations, in particular the duty of care according to the SCDDA and report on it in accordance with the SCDDA.

February, 2023

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