

3M Norge AS

Tærudgata 16, 2004 Lillestrøm  
Postboks 300, 2001 Lillestrøm  
Telefon: 0 63 84



Lillestrøm, 27.06.23

## Norwegian Transparency Act – Adoption of 3M Modern Slavery Statement

In order to comply with Section 5 of the Norwegian Transparency Act, 3M Norge AS has adopted the 3M Modern Slavery Statement. This statement describes 3M Company's and its subsidiaries' actions on modern slavery and human trafficking in our business and supply chains.

Signed on behalf of the directors of 3M Norge AS as follows:

**Name:** Lars Hanseid

**Title:** MD and Board Member

**Signature:**   
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**Date:** 27-Jun-2023 | 16:37 CEST

**Name:** Lars Petter Plaaterud

**Title:** Chair of the Board

**Signature:**   
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**Date:** 27-Jun-2023 | 16:56 CEST

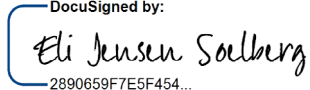
**Name:** Monica Stürtzel

**Title:** Board Member

**Signature:**   
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**Name:** Eli Jensen Soelberg

**Title:** Board Member

**Signature:**   
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**Date:** 27-Jun-2023 | 07:17 PDT

**Name:** Ketil Nordengen

**Title:** Country Lead

**Signature:** DocuSigned by:  
Ketil Nordengen

**Date:** 27-Jun-2023 | 15:56 CEST

# 2023

## Modern Slavery Statement

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## 3M Modern Slavery Statement overview

This statement describes 3M Company's and its subsidiaries' actions on modern slavery and human trafficking in our business and supply chains for calendar year 2022 (January 1 – December 31). This statement is published in accordance with the provisions of the United Kingdom (UK) Modern Slavery Act 2015, Australian Modern Slavery Act 2018 (Cth), the California Transparency in Supply Chain Acts, the Norway Transparency Act, the German Supply Chain Due Diligence Act (LkSG, and French Corporate Duty of Vigilance Law (Law n°2017-399, 27 mars 2017).

- 3M United Kingdom PLC (UK)
- Scott Health & Safety Limited (UK)
- SGX WM Limited (UK), Collectively 3M UK;
- 3M Australia Pty Limited;
- 3M Norge AS;
- 3M Deutschland GmbH; and
- 3M France

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

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

This Statement for 3M Company, 3M United Kingdom PLC (UK) and 3M Australia Pty Limited was approved on 26 June 2023 by the Executive Team of 3M Company in its capacity as the principal governing body.



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**Kevin Rhodes**  
Executive Vice President,  
Chief Legal Affairs Officer  
Member of 3M Company's Executive Team



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**Peter Gibbons**  
Group President  
Enterprise Operations  
Member of 3M Company's Executive Team

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

[3M Annual Report, Form 10-K](#)  
[3M Global Impact Report](#)  
[ESG metrics \(link will download file\)](#)  
[3M Sustainability/ESG/Social](#)  
[3M Ethics and Compliance](#)  
[3M Supplier Direct](#)  
[3M UNGC Communication on Progress](#)

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

At 3M, 92,000 employees are dedicated to applying science in collaborative ways to improve lives daily. For over 120 years, we have been dedicated to science and exploration, taking on global challenges and developing solutions for our customers.

### Our Purpose, Promise, and Principles

As a company, we are guided by our Purpose, Promise, and Principles as we create unique and differentiated value for our customers, shareholders, and our stakeholders.

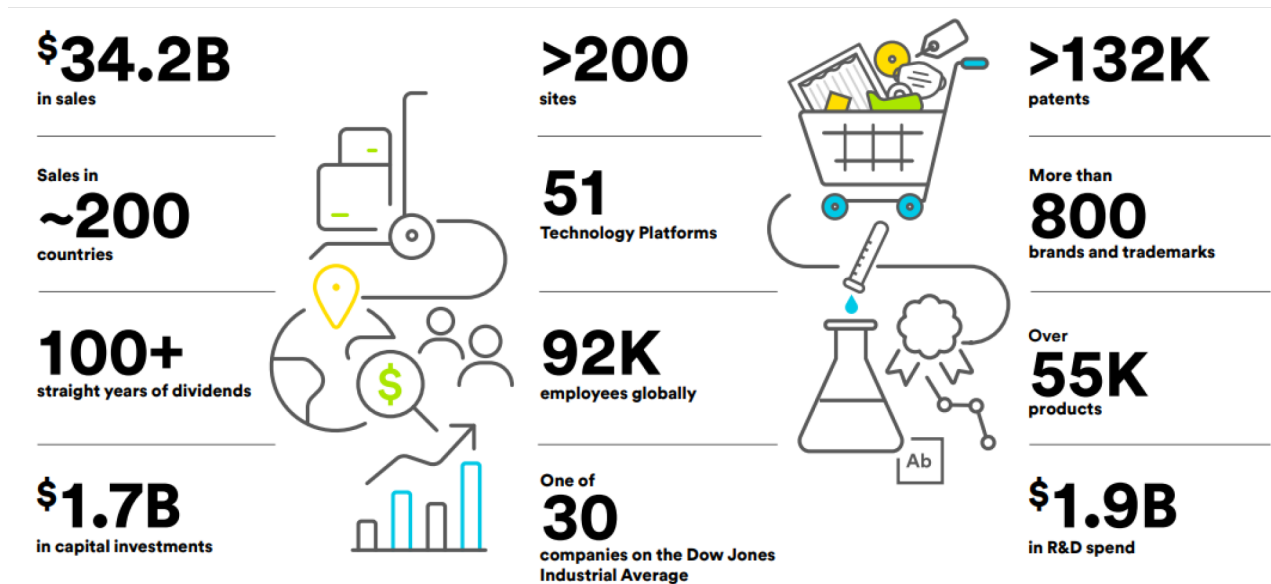
<b>Our Purpose</b>	<b>Unlock the power of people, ideas, and science to reimagine what's possible</b>
<b>Our Promise</b>	<b>Improve lives by helping solve the world's greatest challenges</b>
<b>Our Principles</b>	<b>Science-based performance</b> <b>Unparalleled expertise, extraordinary customers</b> <b>Makers of what's next</b> <b>Strength in collaboration</b> <b>Change for good</b>

All these bind us together as one 3M, unified in our ambitions and empowered to act to drive growth, development, reputation, and impact with every action. These collective ideals correspond to expectations from our customers, investors, and our employees.

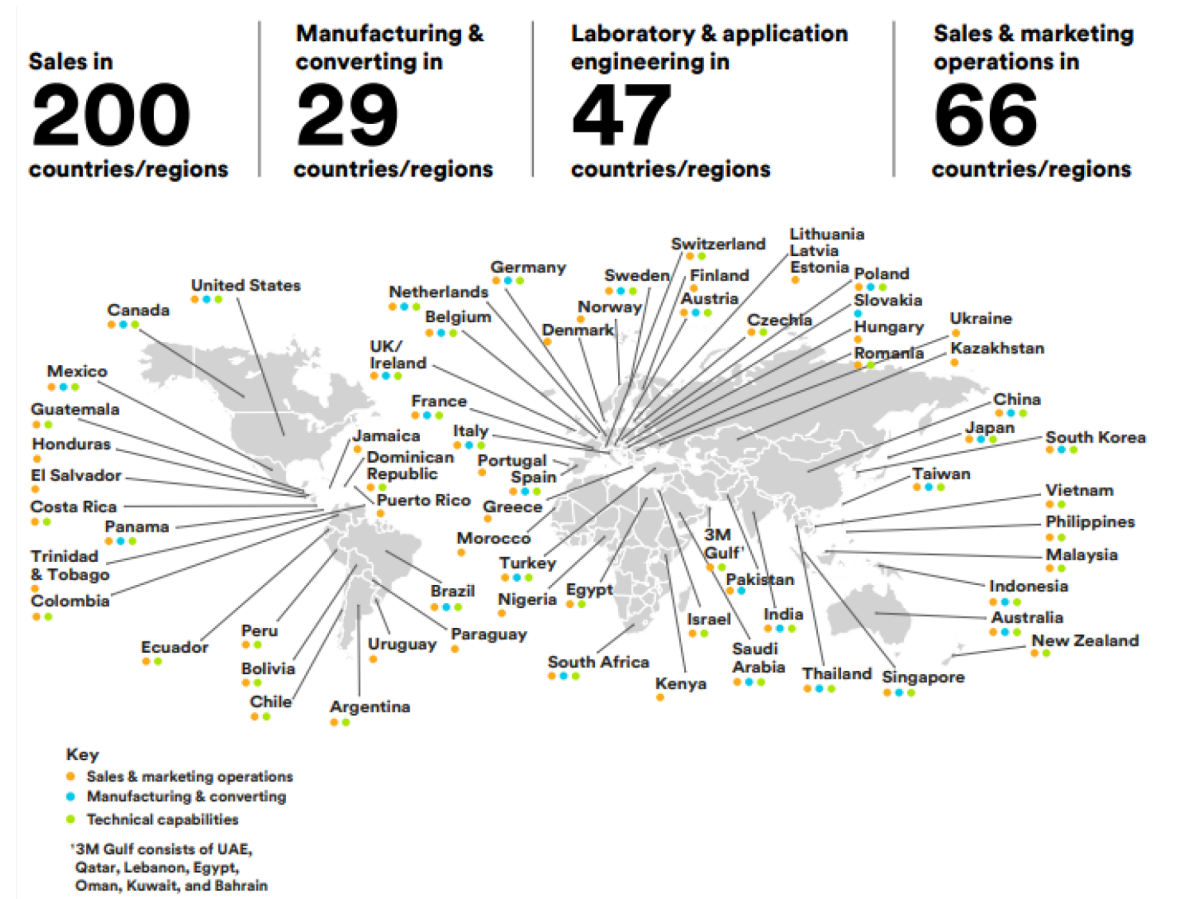
3M's four business groups bring together common or related 3M technologies, enhancing the development of innovative products and services and providing for efficient sharing of business resources. We have operations in over 70 countries, bringing together a combination of our 51 unique Technology Platforms to sell over 55,000 products in nearly every country. Read about 3M's four business groups on pages 4–5 of our [2022 Annual Report on Form 10-K](#).

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

## 3M at a glance



## 2022 global capabilities



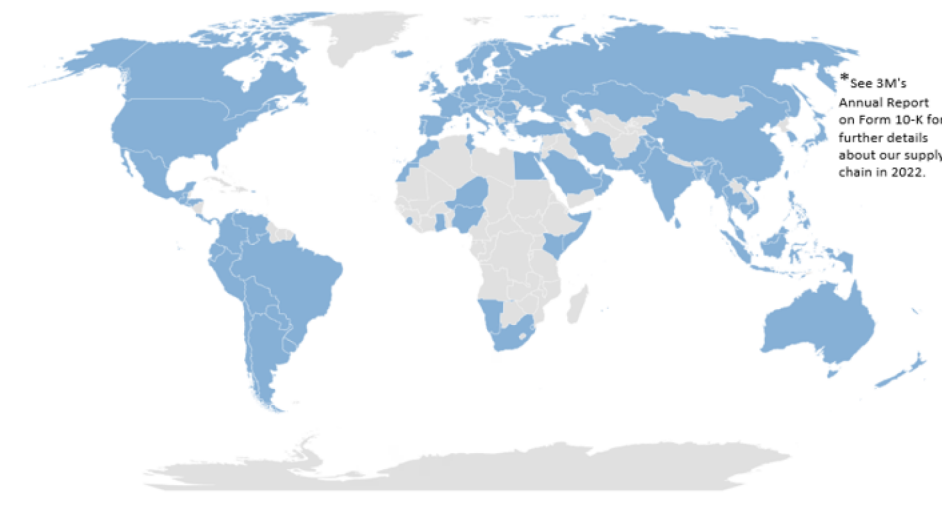
## Our supply chains

3M works with broad, complex global supply chains, consisting of over 55,100 suppliers in over 276 subcategories in 111 countries around the world. We procure from large multinational companies, and from small and medium-sized businesses, which include diverse suppliers. Our material suppliers can have suppliers of their own. 3M is typically several tiers away from the original source of the components of our purchased materials, which emphasizes the importance of our suppliers having due diligence programs in place to also monitor supply chain risks.

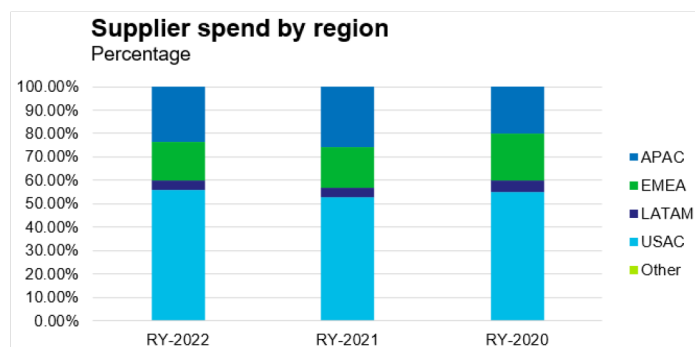
At 3M, we set a high bar for our company regarding environmental and social governance, and we expect the same from our suppliers. 3M follows the Organisation for Economic Co-operation and Development Due Diligence framework for all our responsible sourcing activities. The [3M Supplier Responsibility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

## 3M supply chains at a glance

### 2022 supplier locations



### Supplier spend by region 2022 percentage





## Our values reflected in our policies and standards

Modern slavery, as an umbrella term, encompasses several human rights issues including forced labor, bonded labor, child labor, human trafficking, and slavery-like practices. 3M has a robust stance against these practices, as set forth in our labor, employment, and business conduct policies and the 3M Supplier Responsibility Code. These policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls, all with the aim of preventing these practices in our organization and in our supply chains.

### Within our operations

3M's [Human Rights Policy](#) applies to all 3M employees worldwide, contingent workers, anyone doing business with or on behalf of 3M, candidates for hire at 3M and others acting on 3M's behalf. This global policy applies to all locations and situations where 3M business is conducted and to all company sponsored events.

Within 3M, our approach to managing and respecting human rights is guided by the 3M Code of Conduct, which recognizes the right of 3M workers to have a respectful work environment. 3M continues to implement our human rights program through our global policies, management system, assessments, audits, training, and ultimately, our metrics tracking.

Acting with unwavering integrity and transparency is core to who we are. Every decision must be guided by the 3M [Code of Conduct](#). We have one Code of Conduct that applies to our 92,000 employees in over 70 countries. Our Code of Conduct summarizes 3M's compliance principles and raises awareness about how to do business the right way, at all times and at every site. The Code of Conduct is our guide, answering questions and providing direction when the right choice may not be clear. This extends to laws regarding slavery or human trafficking in the countries in which we do business. The Code of Conduct is available in 22 languages and sets clear expectations for employees and relevant stakeholders, including distributors, consultants, and other representatives. 3M's Code and underlying policies also require 3M employees to select and retain suppliers, contractors, outsourced manufacturers, and service providers who comply with all applicable laws and regulations and align with the 3M values in the areas of labor and human rights, environment, health and safety (EHS), and ethics.

### Child labor and minimum hiring age

3M does not tolerate child labor. 3M is committed to doing our part to help abolish child labor. This commitment is evident in our Human Rights Policy. Although the permissible hiring age for employees may vary based on the laws of different countries, 3M has adopted global expectations regarding the hiring of minors. Even if local law permits it, 3M will not hire any employee or contingent worker (an individual provided by a third-party staffing agency to perform temporary work) below the age of 16 for any job. If the applicable laws impose a minimum age requirement higher than 16, 3M follows the stricter standard in compliance with the law. See our Supplier Responsibility Code for details on supplier requirements.

### Forced and compulsory labor

3M does not tolerate forced or compulsory labor. 3M is committed to doing our part to help abolish forced and compulsory labor. 3M complies with all applicable laws and employment regulations and does not engage or participate in forced labor. We have those same expectations for all suppliers doing business with us. This commitment is evident in our Human Rights Policy and Supplier Responsibility Code. We do not allow the financial burden (withholding wages, imposing fees) to be placed on workers, recruiters, or suppliers. 3M has trade compliance experts who monitor trade laws and regulations,

including those related to human rights concerns. As we become aware of potential risks from specific regions or countries, we review our relationships and businesses to determine if we need to act further.

## **Human trafficking**

3M does not tolerate human trafficking. 3M is committed to doing our part to help abolish human trafficking. Our Human Rights Policy details our prohibition against human trafficking. We are committed to using effective systems and controls to do our part to help prevent human trafficking from taking place anywhere within our business or supply chains.

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

## **Within our supply chains**

Beyond 3M, the 3M Supplier Responsibility Code outlines 3M's basic expectations for suppliers and their sub-contractors in the areas of management systems, labor, EHS, and ethics. The Supplier Responsibility Code is a part of 3M's contract provisions and purchase order Terms and Conditions. The 3M Supplier Responsibility Code is available in 15 languages and applies to the selection and retention of all 3M suppliers globally. Under the Supplier Responsibility Code, 3M suppliers are expected to comply with all local country labor, human resource, and environmental laws. The Supplier Responsibility Code prohibits suppliers from using forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, trafficked or slave labor. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility, nor any unreasonable restrictions on entering or exiting company-provided facilities. In addition to full compliance with all applicable labor and human resource laws, we expect our suppliers to be committed to upholding the human rights of workers and treating them with dignity and respect, as understood by the international community. This expectation applies to all workers, including temporary, migrant, student, contract, direct employees, and any other type of worker.

The Labor section of our Supplier Responsibility Code includes baseline requirements in the areas of:

- Freely chosen employment
- Young workers
- Working hours
- Wages and benefits
- Humane treatment
- Non-discrimination / Non-Harassment
- Freedom of association

## **Modern slavery risk assessment and due diligence management system**

In our view, human rights due diligence requires a holistic approach. We assess our own business as well as those acting on our behalf — in supply roles, government relationships, acquisitions, mergers, and divestitures — to identify salient human rights issues relevant to our business.

These evaluations are integrated into other assessment and management processes and are based on material issues regardless of where they're identified within the value chain.

3M's Due Diligence Management System for identifying and addressing the risks of modern slavery include:

- Strong policies and management systems, including executive management engagement
- Identifying and assessing risks
- Designing and implementing a strategy to respond to identified risks
- Continuous assessment and audits
- Reporting on due diligence activities

## Within our operations

Within 3M, our approach to managing and respecting human rights, including modern slavery, is based on the 3M Code of Conduct. Senior executive leadership is engaged and active in ensuring that 3M's Code of Conduct is understood and followed by 3M employees and our business partners. The 3M Business Conduct Committee is composed of several senior executives and is chaired by 3M's Senior Vice President, Chief Ethics & Compliance Officer. This committee oversees 3M's compliance efforts to assure that 3M has an effective and world-class compliance program — one that is agile and anticipates changes in 3M business strategies and the external landscape in which 3M operates.

3M's Chief Ethics & Compliance Officer provides quarterly updates on compliance activities to the Audit Committee of the Board of Directors and the 3M Business Conduct Committee. 3M's Chief Ethics & Compliance Officer also meets regularly with the Company's senior leadership to share ethics and compliance initiatives and priorities and to discuss ethics and compliance key performance indicators, including the programs in place to help ensure that 3M and its business partners respect human rights. Additionally, similar committees exist at country, region, and area levels to operationalize and prioritize compliance activities.

All 3M employees are expected to be leaders when it comes to ethics and integrity, and to meet these important commitments:

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

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

Upholding 3M's Code of Conduct is the responsibility of everyone acting on 3M's behalf. We encourage our employees to ask questions and report concerns to management, 3M's Ethics & Compliance Department, 3M legal counsel, [3MEthics.com](https://www.3methics.com), their assigned human resources manager, 3M's Corporate Audit Department, or the Audit Committee of the Board of Directors. Our strong ethical culture requires and empowers employees to make the right choices every day.

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

The Ethics & Compliance Department has the responsibility to review every reported business conduct

concern and to decide which reports require an internal investigation. If an investigation is needed, the department assigns appropriate investigative resources. Substantiated matters may result in disciplinary actions. Discipline may take many forms consistent with similar past violations, from warnings to suspensions to termination. Disciplinary actions may impact one or more persons associated with a substantiated violation. The [3M Global Allegations & Disciplinary Actions graph](#) illustrates business conduct-related reports raised in 2020, 2021, and 2022 using 3MEthics.com. We use this data to prioritize resources and focus strategies.

Additional information on the 3M global allegations and investigations process can be found on 3M's external [Ethics & Compliance](#) website.

To help protect our employees' rights, our Employee Relations (ER) Assessment tool enables any 3M location globally to assess its policies and practices. By using the tool and tracking data throughout the process, leaders can review practices related to 3M's Human Rights Policy, identify strengths and opportunities for improvement, and develop an action plan to address any potential gaps.

3M Corporate Audit periodically audits our human resource practices for employees and non-employees to assure compliance with 3M guidelines and external regulations (e.g., for hiring, timekeeping, payroll, benefits, etc.). It also promotes ethical business practices and investigates ethics-related concerns.

## **Within our supply chains**

Our 3M Supplier Responsibility Code sets forth our approach to managing and assuring human rights, including modern slavery, within our supply chains. The Supplier Responsibility Code sets the basic expectations of suppliers in the areas of Labor, EHS, Ethics and Management Systems. Modern Slavery and human trafficking are key elements of our labor expectations and due diligence.

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

3M communicates its human rights and labor expectations to suppliers through its use of contractual provisions and other binding legal obligations, links to 3M's website and in direct business meetings. 3M includes a clause in our contracts and general purchase order terms governing our relationships with suppliers. The clause, sets forth 3M's expectation of compliance with these expectations by suppliers, stating that suppliers will not provide products or services to 3M that use labor resulting from mental or physical coercion, physical punishment, slavery, human trafficking, or other oppressive labor conditions. 3M expects its suppliers to have similar policies and practices that align with the 3M Supplier Responsibility Code, including due diligence with their suppliers. Human trafficking and forced labor-related provisions are also included in 3M's U.S. government contracts requirements for suppliers.

The Supplier Responsibility Code also prohibits suppliers and their employees from engaging in any form of human trafficking. Additional information can be found at [3M Supplier Direct](#).

3M has implemented a supplier risk evaluation process to assess existing, prioritized suppliers that could be at risk for non-conformance with our Supplier Responsibility Code, including the human rights elements. The risk factors used in this process include geographic risk, commodity/category risk, business risk, type of operations, and annual 3M purchases. We conduct this internal supplier risk evaluation process on an annual basis.

Our general supplier performance verification process begins with a supplier completing a self-assessment questionnaire. The completed self-assessment questionnaire helps 3M understand supplier programs and determine whether they conform to 3M expectations. Remote or on-site assessment may be conducted by 3M or a third party to assess the supplier's level of conformance with 3M's

expectations. If deficiencies are identified, they are addressed through a Supplier Responsibility Code Corrective Action Preventive Action process. Follow-up on the process may include announced or unannounced assessments.

In 2022, we integrated a third-party ESG audit approach, the Responsible Business Alliance (RBA) Validated Audit Program, into our verification process for suppliers in higher-risk categories. If the assessment identifies gaps or findings, and if a supplier is not able or willing to resolve them, the process will move to the Responsible Sourcing Supplier Issue Escalation process where alternative actions are determined with a cross-functional business team to elevate and resolve the situation. Additional details can be found at 3M Supplier Direct.

New suppliers in higher risk regions and categories are qualified using the same criteria 3M uses for existing supplier assessments, which include their working conditions and employment practices, such as forced labor and human trafficking prevention programs. 3M also conducts on-site audits of our suppliers. Suppliers who do not pass these audits do not qualify to supply 3M.

We also expect our suppliers to periodically assess themselves and their suppliers for conformance to our expectations. The process begins with a self-assessment questionnaire (SAQ) that helps us understand supplier programs and determine if they meet our expectations. The SAQ focuses on our Supplier Responsibility Code requirements. Since 2008, we have conducted over 8,300 on-site audits or self-assessments of prioritized suppliers in higher-risk countries. Along the way, our assessment process has become more evolved and more comprehensive. In 2022, 3M completed more than 457 assessments in 31 countries, which covered every geographic area of the world.

The Supplier Responsibility Code outlines supplier expectations relating to grievance mechanisms. Anyone who has a concern involving 3M can use the 3MEthics.com site to report a concern. The concern can be reported anonymously if desired, if allowable by local law.

In addition to the global Supplier Responsibility Code expectations for all suppliers, certain areas are subject to additional and specific formal expectations of sustainable and responsible practices. This includes our use of certain minerals with the potential to be sourced from conflict-affected and high-risk areas, our use of timber-based forest products and other renewable materials, and all new suppliers in the higher-risk countries, such as in Asia Pacific, Latin America, or parts of Europe, Middle East, and Africa. For more information on our management of conflict minerals and timber-based forest products, see [3M's Responsible Minerals website](#) and [Sustainable Forestry website](#).

3M's global Responsible Sourcing team, part of the Strategic Sourcing and Packaging Solutions organization, implements our supplier risk assessment and auditing program. It also helps assure that 3M complies with related export, import, and trade laws across our global business activities. Oversight is provided by Strategic Sourcing leadership and a cross-functional executive committee consisting of leaders from 3M Enterprise Supply Chain, including Strategy and Strategic Sourcing, as well as from Human Resources, Ethics & Compliance, Legal Affairs, Corporate Audit, EHS, Product Stewardship, and Sustainability. We also have a robust governance framework that guides our sustainability and EHS activities, with primary Board-level oversight by the Science, Technology & Sustainability Committee of the 3M Board of Directors.

## **Government contracting**

3M is committed to being a responsible company with unwavering integrity in all dealings with local, state/provincial, and national governments and with their prime contractors and subcontractors around the world.

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

In the United States, the federal government has adopted a regulation (Federal Acquisitions Regulation 52.222-50) prohibiting human trafficking, including slavery, servitude, forced and compulsory labor and coercion to induce a commercial sex act or to procure the same — all of which result in the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

3M has implemented processes to assure compliance with the U.S. Federal Acquisitions Regulation, including a Human Trafficking Prevention Standard. Human trafficking and forced labor related provisions are also included in 3M's contracts with suppliers involved in 3M's contracts with governments.

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

## Modern slavery risk training

3M provides training globally to assure 3M employees, including security employees and contractors, comply with the law, 3M's Code of Conduct, supporting policies, standards, and procedures, including human rights.

### Within our operations

3M Ethics and Compliance administers a comprehensive required online compliance training program to employees worldwide. Employees are assigned training modules based on their role and area of responsibility. Online courses are offered in 22 languages.

3M's Code of Conduct and Ethical Decision-Making course is upon hire and every other year thereafter for employees in corporate functions and business groups. This course includes content on [3M's Respectful Work Environment Principle](#) 3M's Global Human Rights Policy, and 3M's commitment to human rights. This course also provides awareness to employees about 3M's expectation for reporting all suspected violations of law or 3M Code and the different channels available for raising such concerns.

In addition to offering online training, the Ethics & Compliance Department — in close collaboration with 3M Legal Affairs, local compliance partners, finance, and human resources — provides frequent, tailored, in-person training to businesses, subsidiaries, staff groups and third parties. Supplemental to the required annual training courses, additional training — live or online — is provided on a risk-based approach.

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

### Within our supply chains

At 3M, we recognize the choices we make for selecting our material and service providers must also reflect our values. We want our suppliers to share our commitment to maintaining compliant, responsible, safe, and sustainable operations and practices. In addition to full compliance with all applicable labor and human resource laws, we expect our suppliers to be committed to upholding the human rights of workers and to treating them with dignity and respect as understood by the global community.

This applies to all workers, including temporary, migrant, student, contingent and direct employees. These expectations are laid out in the 3M Supplier Responsibility Code and support our Science for Circular goal to drive supply chain sustainability through targeted raw material traceability and supplier performance assurance.

Supplier Responsibility Code training and information for suppliers reside on the 3M Supplier Direct



website. Supplier Responsibility Code information is sent to suppliers prior to conducting an assessment to make clear 3M's expectation that they are aware of these policies — which are also addressed during supplier status review meetings.

Online courses are available on our [3M Business Partner Compliance Awareness training site](#), which include Ethical Business Conduct, Acknowledgement of 3M Code of Conduct, and Preventing Human Trafficking.

## Our ongoing commitment

3M is committed to measuring and continuously improving the effectiveness of our due diligence program regarding modern slavery and human trafficking by continuing to:

- Identify ways to improve employee and supplier awareness of 3M's commitment to respect human rights and efforts to prevent modern slavery and human trafficking within our supply chains
- Staying abreast of information on global risks of slavery and human trafficking
- Focusing our assessment programs on internal and external operations with the highest risk of potential human rights violations
- Enhancing our due diligence management system, processes, and tools, expanding the use of third-party resources to help identify and address salient human rights issues within our sphere of influence and staying aligned with internationally accepted frameworks like the United Nations Guiding Principles
- Strengthening contracts with suppliers, and other forms of supplier self-certification, so that suppliers will not provide products or services to 3M that use labor resulting from mental or physical coercion, physical punishment, slavery, human trafficking, or other oppressive labor conditions, including implementation of policies and due diligence practices to communicate 3M's expectations throughout the 3M supply chain

In 2023 and beyond, 3M will continue to empower our employees to raise human rights concerns. For our suppliers and other third parties we work with, 3M will continue to evaluate our portfolio to identify and mitigate 3M's risks, applying due diligence with our partners and across the supply chain. This includes strengthening our human rights training courses so that 3M's expectations of upholding the human rights of workers and treating them with dignity and respect are made clear to all of 3M's business partners.