



Lillestrøm, 17. Juni 2024

Norwegian Transparency Act – Adoption of 3M Modern Slavery Statement

The Norwegian Transparency Act requires 3M Norge AS to conduct due diligence assessment to identify and assess actual and potential negative impacts on fundamental human rights and decent working conditions that 3M Norge AS has either caused or contributed to, or that are directly linked to 3M Norge AS' business operations, products, or services through supply chains or business partners. Such due diligence shall be carried out in accordance with the OECD Guidelines for Multinational Enterprises. 3M Norge AS is obliged to account for and publish a report on the due diligence assessments conducted in order to comply with Section 5 of the Norwegian Transparency Act.

For the due diligence assessments conducted, both relating to our own business operations and for our supply chains and other business partners, we refer to 3M's Global Impact Report for 2024 ([Reinventing our impact \(3m.com\)](https://www.3m.com)), particularly pages 45 – 49 describing our commitment to upholding human rights in the work environment, work on raising and resolving workplace concerns, assessment of human rights and human rights training and 79 – 83 describing our supplier risk assessment and supply chain transparency. The report describes the findings in 3M's due diligence, risks considered significant, our prioritizations as well as measures implemented to mitigate risks identified and the results we expect from such measures. The due diligence assessments as well as the various policies described in the Global Impact Report apply to 3M Norge AS.

Hence, 3M Norge AS has adopted this 3M Modern Slavery Statement. The statement, with the further references contained therein, describes 3M Company and its subsidiaries' actions on modern slavery and human trafficking in our business and supply chains in compliance with the Norwegian Transparency Act.

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

Name: Lars Petter Plaaterud

Title: Chair of the Board

Signature: 

Date: 19/6-24

Name: Ketil Nordengen


Title: Country Governance Leader & Board Member

Signature: 

Date: 19/6 24

Name: Rigmor Sjøvik Ono

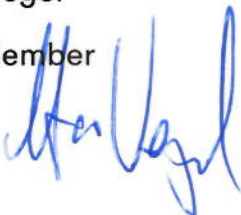
Title: Board Member

Signature: 

Date: 19/6-24

Name: Hans Vegel

Title: Board Member

Signature: 

Date: 19/6-24

2024

Modern Slavery Statement

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3M Modern Slavery Statement overview

This statement describes 3M Company's and its subsidiaries' actions regarding modern slavery and human trafficking in our business and supply chains for calendar year 2023 (January 1 – December 31). This statement is published in accordance with the provisions of the United Kingdom (UK) Modern Slavery Act 2015, the 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), the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Canadian Act"), and the French Corporate Duty of Vigilance Law (Law n°2017-399, 27 mars 2017). Subsidiaries subject to these laws:

- 3M United Kingdom PLC (UK)
- Scott Health & Safety Limited (UK)
- KCI Medical Limited
- 3M Australia Pty Limited
- 3M Norge AS; KCI Medical AS
- 3M Deutschland GmbH; 3M Healthcare Germany GmbH
- 3M France
- 3M Canada Company; 3M Healthcare Canada Company Limited

This statement was produced in consultation with our subsidiaries to identify and assess modern slavery risks that may exist. The following corporate functions regularly meet and discuss the actions described in this statement:

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

This Statement for 3M Company, 3M United Kingdom PLC (UK), 3M Canada Company (Canadian Act, subpara [4][b][iii]), and 3M Australia Pty Limited was approved on 30 May 2024 by the members of the Executive Team of 3M Company whose signatures are set forth below, in 3M Company's capacity as the principal governing body for fiscal year 2023. We have authority to bind the 3M entities listed above.

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for the entities listed above. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in the report is true, accurate, and complete in all material respects, to the best of our knowledge, information and belief for the purposes of the Canadian Act, for the reporting year listed above.



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



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

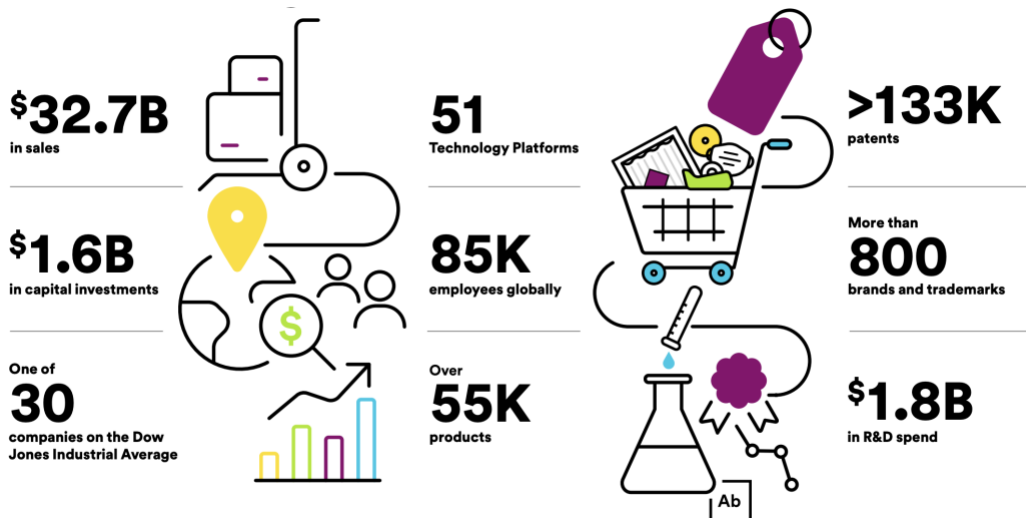
3M business structure, operations, and supply chains

For over 120 years, 3M has been dedicated to science and exploration, taking on global challenges and developing solutions for our customers. For calendar year 2023 (January 1 – December 31), 3M had approximately 85,500 employees dedicated to furthering this legacy.

In 2023, 3M’s four business groups brought together common or related 3M technologies, enhancing the development of innovative products and services and providing for efficient sharing of business resources. We had operations across the globe, bringing together a combination of our 51 unique Technology Platforms to produce and sell over 55,000 products. Read about 3M’s business groups on pages 5–6 of our [2023 Annual Report on Form 10-K](#).

For additional information, select a location to access our applied science innovations and products at 3M.com/select-location.

3M at a glance (2023):



Our supply chains

In 2023, 3M worked with broad, complex global supply chains, consisting of nearly 51,200 suppliers in over 280 subcategories in 103 countries and regions. We procured 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 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, which we participate in.

2023 supplier locations:

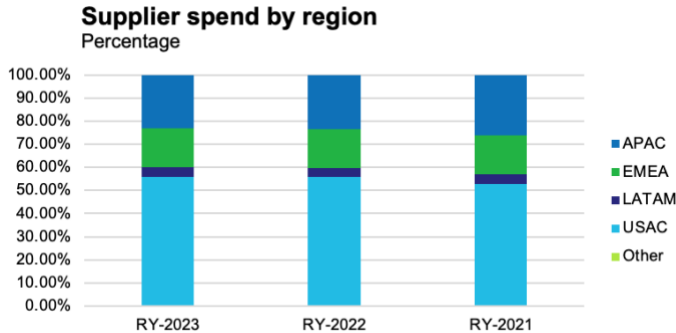
Supplier locations by country



The global economy has been impacted by military conflicts, including the conflict between Russia and Ukraine. The U.S. and other governments have imposed export controls on certain products and financial and economic sanctions on certain industry sectors and parties in Russia. 3M suspended operations of its subsidiaries in Russia in March 2022 and completed a sale of the related assets in June 2023. See 3M's Annual Report on Form 10-K for further details.

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2021–2023 supplier spend:



Our values reflected in our policies and standards

Modern slavery encompasses several human rights issues, including forced labor, bonded labor, child labor, human trafficking, and slavery-like practices. Our stance against these practices is robust. The 3M Supplier Responsibility Code and our labor, employment, and business conduct policies all reflect our commitment to acting ethically and with integrity in our business relationships and to implementing systems and controls with the aim of preventing these practices in our organization or 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. 3M implements our human rights program through our global policies, management system, assessments, audits, training, and metrics tracking.

We have one [Code of Conduct](#) that applies to our employees globally and recognizes the right of 3M workers to have a respectful work environment. Available in 21 languages, our Code of Conduct sets clear expectations for employees, officers, directors, and non-employee third parties who act on 3M's behalf. It summarizes 3M's compliance principles and raises awareness about how to do business the right way, at all times, and at every site. This extends to complying with laws regarding slavery or human trafficking in the countries in which we do business. 3M's Code of Conduct 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 3M values in the areas of labor and human rights and environmental, health, and safety (EHS).

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 permissible hiring ages 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 engage a contingent worker (an individual provided by a third-party staffing agency to perform temporary work) below the age of 16 for any job. If applicable law imposes 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. During the statement year, we did not identify any child labor in our activities or supply chains.

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. This commitment is evident in our Human Rights Policy and Supplier Responsibility Code. 3M complies with all applicable laws and employment regulations and does not engage or participate in forced labor. 3M also does not permit the practice of having employees pay recruitment fees or other related fees in order to obtain employment. We expect the same of all our suppliers. Across 3M, experts in trade compliance, human resources, ethics and compliance, and responsible sourcing monitor human rights risks, trade laws, and related regulations. As we become aware of potential risks from specific regions or countries, we review our relationships and businesses to determine if we need to take further action. During the statement year, we did not identify any forced labor or compulsory labor in our activities or supply chains.

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 prevent human trafficking from taking place anywhere within our business or supply chains. This applies to 3M and our subsidiaries as well as to our government contracts and subcontracts for either commercial items or noncommercial items (items not sold, leased, or licensed to the general public and that have not been offered for sale, lease, or license to the general public). During the statement year, we did not identify any human trafficking in our activities or supply chains.

Within our supply chains

The 3M Supplier Responsibility Code, available in 15 languages, outlines our basic expectations for suppliers and their subcontractors in the areas of management systems, labor, environmental, health, and safety (EHS), and ethics. The Supplier Responsibility Code is a part of 3M's contract provisions and

purchase order Terms and Conditions 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, military 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. The Code prohibits unreasonable restrictions on workers' freedom of movement in the facility, and 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 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:

- Prohibition of forced labor
- Young workers
- Working hours
- Wages and benefits
- Non-discrimination / non-harassment / humane treatment
- Freedom of association and collective bargaining

Modern slavery due diligence management system and risk assessment

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 human rights issues relevant to our business.

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
- Continual assessment and audits
- Reporting on due diligence activities

Our risk evaluations are integrated into other assessment and management processes and are based on material issues regardless of where they are identified within the value chain, as described below.

Within our operations

Within 3M, our approach to managing and protecting human rights, including protection against modern slavery, is guided by 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 efforts to maintain an effective world-class compliance program — one that anticipates and incorporates changes with both internal business strategy and the external landscape.

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. The officer also meets

quarterly with certain Corporate Operating Committee members to share initiatives and priorities for the quarter and discuss ethics and compliance key performance indicators, trends, and insights related to the performance of the compliance program, which includes efforts to ensure that 3M and its business partners respect human rights. 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 integrity
- Complete compliance courses and certifications on time
- Report suspected violations of the law or our Code of Conduct
- 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 job 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), assigned human resources managers, 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 online reporting system. Reporters can choose to submit their concern anonymously in most countries. 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 (IP) addresses. Web-based reports are made through a secure internet portal that does not trace or show user screen names.

The Ethics & Compliance Department is responsible for reviewing every reported business conduct concern and deciding which require an investigation. If an investigation is needed, we assign an appropriate investigative resource. Substantiated violations may result in disciplinary actions. Discipline may take many forms, from warnings to suspensions to termination, and may impact one or more persons associated with the violation. The [3M Global Allegations & Disciplinary Actions graph](#) illustrates business conduct-related reports raised in 2021, 2022, and 2023 using 3MEthics.com. We use these data to prioritize compliance resources and focus strategies.

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

To help protect our employees' rights, our Employee Relations Assessment tool enables 3M locations globally to assess our 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 (for hiring, timekeeping, payroll, benefits, etc.). It also promotes ethical business practices and investigates ethics-related concerns.

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 of highest risk. As part of a global process, 3M consults key external informational resources to identify areas at risk of slavery and human trafficking.

In addition, 3M communicates our human rights and labor expectations to suppliers through 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 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.

3M has implemented an annual supplier risk evaluation process to assess existing and new prioritized suppliers that could be at risk for nonconformance with our Supplier Responsibility Code, including its human rights elements. Risk factors include geography, commodity/category, business, type of operations, and annual 3M purchases. 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.

The evaluation process begins with the supplier completing a self-assessment questionnaire that helps us understand its due diligence programs and determine if they meet our expectations. 3M may prioritize additional assessments or on-site audits. We have integrated third-party ESG audit approaches, such as the Responsible Business Alliance (RBA) Validated Audit Program and others as applicable, into our verification process for suppliers in higher-risk categories. In 2023, we piloted third-party on-site Supplier Responsibility Code audits in six countries. Results were positive, and we are exploring further use of third-party audits as we refine our assessment process.

We address deficiencies through a Supplier Responsibility Code Corrective Action Preventive Action process. Follow-up on the process may include additional audits.

If a supplier is not able or willing to resolve any gaps or findings, the process moves to the Responsible Sourcing Supplier Issue Escalation process. If the supplier is still unwilling to work on the gaps or cannot resolve them in a reasonable amount of time, a cross-functional team considers alternative actions to elevate and resolve the situation. Potential new suppliers who are not able or willing to conform with the Supplier Responsibility Code do not qualify to supply to 3M. Additional details can be found at 3M Supplier Direct.

Since 2008, we have conducted over 8,600 on-site audits or self-assessments of prioritized suppliers in higher-risk countries. In 2023, 3M completed 285 assessments — about 6% of our higher-risk suppliers — in 31 countries, covering every geographic area of the world. We expect our suppliers to periodically assess themselves and their suppliers for conformance.

The Supplier Responsibility Code also outlines supplier expectations relating to grievance mechanisms. Anyone who has a concern involving 3M can use [3MEthics.com](https://www.3methics.com) to report it, with an option for anonymity in most countries.

In addition to our global Supplier Responsibility Code expectations, certain areas require additional and specific formal expectations to drive more sustainable, 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 higher-risk countries in Asia-Pacific, Latin America, Europe, the 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 & Sustainability team, part of the Global Procurement 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 Global Procurement leadership and a cross-functional executive committee consisting of leaders from 3M Enterprise Supply Chain, including Global Procurement, as well as from Human Resources, Ethics & Compliance, Legal Affairs, Corporate Audit, EHS, Product Stewardship, Trade Compliance, and Sustainability. We also have a robust governance framework that guides our sustainability and EHS activities, with primary Board-level oversight by the 3M Board's Science, Technology & Sustainability Committee.

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 Acquisition 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. 3M has implemented processes to assure compliance with the U.S. Federal Acquisition Regulation 52.222-50, including a Human Trafficking Prevention Standard. Provisions related to human trafficking and forced labor are also included in 3M's government contract flowdown requirements for suppliers.

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

Modern slavery risk training

3M provides training globally to 3M employees, including contingent workers, to communicate and reinforce the expectation and requirement that they will comply with the law, 3M's Code of Conduct, and supporting policies, standards, and procedures, including those related to human rights.

Within our operations

3M's Ethics & Compliance organization administers a comprehensive online compliance training program to employees worldwide. Employees are assigned training modules based on their role and area of responsibility. In 2023, most online courses, as well as our annual Code of Conduct certification, were mandatory for all nonproduction employees. Online courses are offered in 22 languages.

3M's Code of Conduct and Ethical Decision-Making course is required upon hiring for all new employees 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 of Conduct, and the different channels available to do so.

In addition to 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. This supplemental training may be annual, as requested, or when needed.

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

3M recognizes that the choices we make for selecting our material and service providers must also reflect our values. We expect 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. Online courses are available on our [3M Business Partner Compliance Awareness training site](#) and include Ethical Business Conduct, Acknowledgement of 3M Code of Conduct, and Preventing Human Trafficking.

Our ongoing commitment

3M is committed to measuring and continually improving the effectiveness of our due diligence program regarding modern slavery and human trafficking. We will continue 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
- Stay abreast of information on global risks of slavery and human trafficking
- Focus our assessment programs on internal and external operations with the highest risk of potential human rights violations
- Enhance 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
- Strengthen contracts with suppliers and other forms of supplier self-certification to prohibit suppliers from providing 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 2024 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.

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 \(file will download\)](#)

[3M Sustainability/ESG – Social](#)

[3M Ethics & Compliance](#)

[3M Supplier Direct](#)

[3M UNGC Communication on Progress](#)