



Lillestrøm, 21. maj 2025

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 to comply with Section 5 of the Norwegian Transparency Act.

Within our own operations, our approach to managing and protecting human rights is guided by the [3M Code of Conduct](#). We also expect our suppliers to share our commitment to complying with applicable law and upholding the [human rights](#) of workers. Our due diligence assesses our businesses and supply chain with further details which can be found in the 3M 2025 Modern Slavery Statement, under the Modern Slavery due diligence management system and risk assessment. The due diligence and risk assessments as well as the various policies described in the 3M Modern Slavery Statement 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: 27/5-25

Name: Ketil Nordengen

Title: Country Governance Leader & Board Member

Signature: 

Date: 27/5-25

Name: Rigmor Sjøvik Ono

Title: Board Member

Signature: 

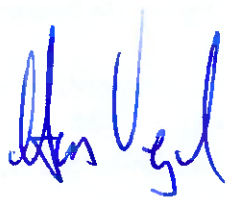
Date: 27/5-25

Name: Hans Vogel

Title: Board Member

Signature:

Date: 23/5-25



2025

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 2024 (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)
- 3M Australia Pty Limited
- 3M Norge AS
- 3M Deutschland GmbH
- 3M France
- 3M Canada Company

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 Supply Chain
- Ethics & Compliance
- Public Affairs
- Human Resources
- Legal Affairs
- Global Procurement

This Statement for 3M Company, 3M United Kingdom PLC (UK), 3M Canada Company (Canadian Act, subpara [4][b][ii]), 3M Norge AS, and 3M Australia Pty Limited was approved for fiscal year 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. We have relied on information provided by the relevant subject matter experts and responsible persons at 3M Company and our subsidiaries. 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 and Secretary
Member of 3M Company's Executive Team



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

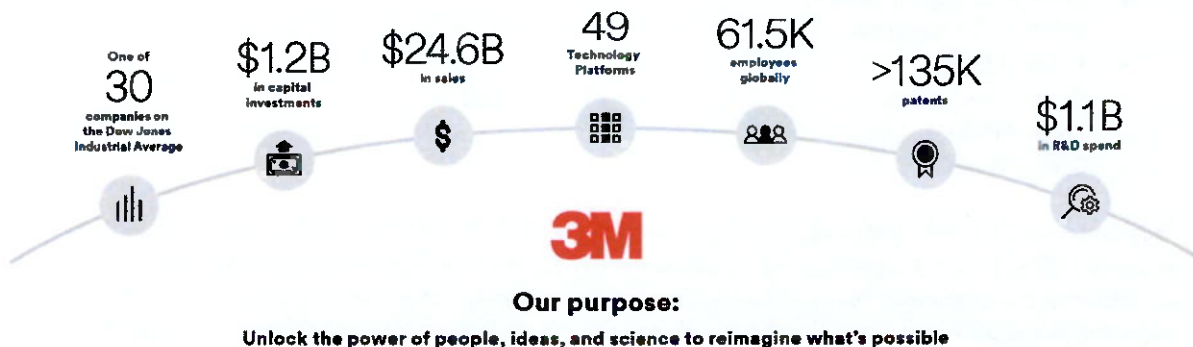
3M business structure, operations, and supply chains

For over 120 years, 3M has been dedicated to science and exploration, taking on global challenges and developing solutions for our customers. On April 1, 2024, 3M completed the spinoff of Solventum, an undertaking of nearly two years. This statement is for 3M's continuing operations, excluding Solventum. For calendar year 2024 (January 1 – December 31), 3M's continuing operations had approximately 61,500 employees dedicated to furthering this legacy.

In 2024, 3M's three 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 49 unique Technology Platforms to produce and sell tens of thousands of products. Read about 3M at www.3m.com.

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

3M 2024 continuing operations at a glance:



Our supply chains

In 2024, 3M worked with broad, complex global supply chains, consisting of nearly 30,600 suppliers in over 280 subcategories in 91 countries and regions. We procured from large multinational companies and from small and medium-sized businesses. 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.



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. 3M does not tolerate these practices in its operations or supply chains. The 3M Code of Conduct, 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 the extent permitted by applicable laws, 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 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. The Code of Conduct sets clear expectations for employees, relevant stakeholders, and business partners and is available in applicable languages. It summarizes 3M's compliance principles and raises awareness of 3M's expectations 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 environment, health, and safety (EHS).

Child labor and minimum hiring age

Our commitment to helping abolish child labor is evident in our Human Rights Policy. While minimum hiring age requirements may vary by geography, 3M has adopted global expectations regarding the hiring of minors. 3M adheres to a global minimum hiring age of 16. We also follow any applicable law that imposes a higher hiring age under certain circumstances. See our Supplier Responsibility Code for details on supplier requirements. During the statement year, we did not confirm any child labor in our supply chains that required remediation.

Forced and compulsory labor

3M complies with applicable laws and employment regulations. 3M does not engage or participate in forced labor, nor do we permit the practice of having employees pay recruitment or related fees in order to obtain employment. We expect the same from all our suppliers. This commitment is evident in our Human Rights Policy and Supplier Responsibility Code.

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 confirm any forced labor or compulsory labor in our supply chains that required remediation.

Human trafficking

3M does not tolerate 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.

Within our supply chains

The 3M Supplier Responsibility Code, updated in July 2024, outlines our basic expectations for suppliers and their subcontractors in the areas of management systems, labor, EHS, and ethics. The Supplier Responsibility Code is a contract commitment included in 3M purchase order terms and conditions. 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, 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, including, if applicable, workers' dormitories, living quarters, or restrooms. 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. This applies to direct employees and any non-employee workers. The Labor section of our Supplier Responsibility Code includes requirements, as permitted by applicable laws, 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 our suppliers to identify human rights issues relevant to our business.

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

- Establish strong policies and management systems
- Identify and assess risks
- Design and implement a strategy to respond to identified risks
- Audit supply chain due diligence
- Report 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. The 3M Business Conduct Committee is composed of several senior executives and is chaired by 3M's chief ethics & compliance officer. This internal committee oversees 3M's efforts to maintain an effective global compliance program.

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, discuss key performance indicators, and seek feedback. Similar business conduct committees exist, based on risk, in certain geographies and business group operations to operationalize and prioritize compliance activities.

We hold all 3M employees, including supervisors, managers, and other leaders, responsible for knowing and following the ethical, legal, and 3M policy requirements that apply to their job and for reporting any suspected violations of law or the Code of Conduct.

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, or the Audit Committee of the Board of Directors. At 3M, we make it clear that speaking up is the right thing to do.

3MEthics.com is a 24-hour confidential online reporting system. Reporters can choose to submit their concern anonymously. 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. In further support of anonymous reporting, a system enhancement allows a reporter to enter their email address (not visible to anyone in the system) to receive communications from investigators, increasing reporters' visibility to case status and activity.

The Ethics & Compliance Department is responsible for reviewing every reported business conduct concern and assigning an appropriate investigative resource if needed. The results may indicate a need for focused employee training or process improvements, and we work with key stakeholders to address those needs. Substantiated violations may result in disciplinary actions consistent with similar past violations, from warnings to suspensions to termination. One or more persons associated with the violation may be impacted. The [3M Global Allegations & Disciplinary Actions graph](#) illustrates metrics related to reported concerns captured in 3M's case management system in 2022, 2023, and 2024 using 3MEthics.com. We use this 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.

3M maintains an assessment tool that sites may use to proactively evaluate employee relations practices, including with respect to the expectations in our Human Rights Policy. 3M also regularly conducts employee surveys to solicit direct feedback. We use this information to develop action plans and inform our workforce strategies.

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

3M has an annual supplier risk evaluation process to assess prioritized existing 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. New suppliers are also assessed as part of the supplier selection process. Supplier Responsibility Code information is sent to suppliers prior to conducting an assessment to make clear 3M's expectation that

they are aware of, and in compliance with, 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 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. Our use of third-party on-site audits expanded in 2024, building on successful pilots at six locations in 2023.

We address deficiencies through a Supplier Responsibility Code corrective action process. Follow-up on the process may include additional audits. If a supplier is not able or willing to resolve critical gaps or findings, the process moves to a supplier issue escalation process. If the supplier is still unwilling to work on the gaps or cannot resolve them in a timely manner, 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 may not qualify to supply to 3M. Additional details can be found at [3M Supplier Direct](#).

The Supplier Responsibility Code also outlines supplier expectations relating to grievance mechanisms. Anyone who has a concern involving 3M can use [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 new suppliers in higher-risk countries. 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.

Modern slavery risk training

3M offers a comprehensive online compliance training program to employees worldwide on 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 an online compliance training program to employees worldwide. Each year we establish a training plan based on an assessment of internal and external factors that help prioritize topics and timing of deployment. Online courses cover all areas of our compliance program and are offered in languages appropriate for our employee population.



Ethics & Compliance tracks on-time and total completion rates, which remain strong. Ethics & Compliance courses are available through 3M Learn, 3M's enterprise learning platform — an easy, accessible one-stop shop for employees.

In addition to online training, the Ethics & Compliance Department — in close collaboration with 3M legal affairs, finance, human resources, and local compliance partners — provides tailored live training to businesses, subsidiaries, staff groups, and third parties. Training is provided to applicable 3M employees on the Supplier Responsibility Code. 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.

This applies to all workers engaged by our suppliers, including temporary, migrant, student, contingent, and direct employees. These expectations are laid out in the 3M Supplier Responsibility Code.

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:

- Empower our employees to raise human rights concerns
- Communicate to our employees and suppliers 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 activities with the highest risk of potential human rights violations
- Maintain our due diligence management system, processes, and tools to help identify and address salient human rights issues within our operations and supply chains
- 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

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 Sustainability](#)

[3M Ethics & Compliance](#)

[3M Supplier Direct](#)

[3M UNGC Communication on Progress](#)

