



Lillestrøm, 26. May 2026

## 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 2026 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:** 26.5.2026

**Name:** Ketil Nordengen

**Title:** Country Governance Leader & Board Member

**Signature:** 

**Date:** 26.5.2026

**Name:** Rigmor Sjøvik Ono

**Title:** Board Member

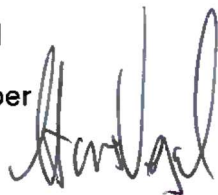
**Signature:** 

**Date:** 26.05.2026

**Name:** Hans Vegel

**Title:** Board Member

**Signature:**



**Date:**

26.5.2026

**2026**

**Modern Slavery Statement**

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## 3M Modern Slavery Statement overview

This statement describes actions taken by 3M Company and our subsidiaries regarding modern slavery and human trafficking in our operations and supply chains for calendar year 2025 (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 Chains Act, 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 (Loi n° 2017-399, 27 mars 2017).

Subsidiaries subject to these laws:

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

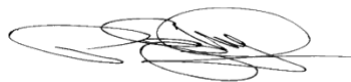
This statement was prepared in consultation with these subsidiaries and with key corporate functions. These consultations included a review of risk assessments, supply chain due diligence, and local compliance practices.

This statement for 3M Company, 3M United Kingdom PLC, 3M Canada Company (Canadian Act, subpara [4][b][iii]), 3M Norge AS, and 3M Australia Pty Limited was approved for fiscal year 2025 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.



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**Kevin Rhodes**  
Executive Vice President  
Chief Legal Affairs Officer and Secretary  
Member of 3M Company’s Executive Team



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**Paul Gallagher**  
Group President  
Enterprise Supply Chain  
Member of 3M Company’s Executive Team

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

3M is a diversified technology company with a global presence in the following businesses: Safety and Industrial; Transportation and Electronics; and Consumer. In 2025, 3M employed approximately 60,500 people worldwide and developed products across three business groups supported by 49 Technology Platforms. Learn more at [www.3M.com](http://www.3M.com).

### Our supply chains

3M's global supply chains include approximately 24,500 suppliers across approximately 90 countries and regions. Our suppliers range from large multinational corporations to small and medium-sized enterprises, with multi-tier structures extending beyond our direct suppliers. This emphasizes the importance of our suppliers having due diligence programs in place to monitor supply chain risks.

We conduct risk prioritization assessments each year to determine where to focus within each geographical area. 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. 3M maps supplier relationships beyond direct (tier 1) suppliers to include upstream suppliers in certain higher-risk categories based on risk considerations.

3M follows the OECD (Organisation for Economic Co-operation and Development) due diligence framework for our responsible sourcing programs. 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, in which we participate.

The 3M Supplier Responsibility Code outlines 3M's basic expectations for suppliers and their subcontractors across management systems, labor practices, ethics, environment, and health and safety. The 3M Supplier Responsibility Code is a contract provision included in 3M purchase order terms and conditions. It prohibits suppliers from using forced labor and prohibits unreasonable restrictions on workers' freedom of movement entering, exiting, or within any company-provided facility.

In addition to compliance with 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 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

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 all countries where 3M has operations.

3M provides information upon request regarding how we address actual and potential human rights impacts. 3M's Responsible Sourcing team, part of Global Procurement, is responsible for overseeing supply chain human rights due diligence.

## **Our values reflected in our policies and standards**

3M does not tolerate forced labor, child labor, bonded labor, human trafficking, or slavery-like practices in our operations or supply chains. The 3M [Code of Conduct](#), [Human Rights Policy](#), Supplier Responsibility Code, and our labor, employment, and business conduct policies reflect our commitment to act ethically and with integrity.

### **Child labor and minimum hiring age**

3M adheres to a global minimum hiring age of 16 for 3M employees. We also follow any applicable law that imposes a higher hiring age. 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 complies with applicable laws and employment regulations and prohibits forced labor in any form. 3M also prohibits the practice of requiring candidates to pay recruitment or related fees to obtain employment with the company. We expect the same from 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 that required remediation.

### **Human trafficking**

3M is committed to using effective systems and controls to prevent human trafficking from taking place anywhere within our business or supply chains.

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

3M's due diligence management system is aligned with the OECD framework and 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

## Governance

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. Similar business conduct committees exist, based on risk, in certain geographies and business group operations to operationalize and prioritize compliance activities.

3M's chief ethics & compliance officer reports directly to the Audit Committee of the Board of Directors. This direct reporting line ensures the independence of the Ethics & Compliance Department, which is responsible for overseeing and administering strategic, systemic, and operational components of 3M's compliance program. The officer also meets quarterly with certain Corporate Operating Committee members to share initiatives and priorities, discuss key performance indicators, and seek feedback.

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

3M's Human Rights Policy applies to all employees worldwide, contingent workers, anyone doing business with or on behalf of 3M, and others acting on 3M's behalf. This global policy applies to locations and situations where 3M business is conducted and to company-sponsored events. 3M implements our human rights program through our global policies, management system, assessments, audits, training, and metrics tracking.

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

## Risk assessment

3M maintains an assessment tool that sites 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 has implemented an annual supplier risk evaluation process to assess 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. 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 assessment process begins with a self-assessment questionnaire that helps us understand supplier programs and determine if they meet our expectations. 3M reviews the questionnaire and determines any needed action, which may include an onsite audit, supplier training, etc. We've integrated third-

party audit approaches and other comparable methods into our assessment process for prioritized suppliers.

In addition to our global Supplier Responsibility Code expectations, certain areas require additional and specific formal expectations to drive more sustainable, responsible practices. For more information on our management of conflict minerals and timber-based forest products, see 3M's [Responsible Minerals](#) and [Sustainable Forestry](#) webpages.

### **Corrective action and escalation process**

3M measures effectiveness using indicators such as audit findings, time to corrective action closure, supplier performance trends, and compliance training completion. 3M maintains defined remediation steps should forced or child labor be identified, including mitigation.

The Ethics & Compliance Department is responsible for reviewing reported business conduct concerns 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. Ethics & Compliance uses this data to prioritize compliance resources and focus strategies. Substantiated violations may result in disciplinary actions consistent with similar past violations, from warnings to suspensions to termination. As an indicator of employee engagement and a healthy compliance culture, 3M tracks a Speak Up rate. Higher call rates reflect employee trust in the reporting process and a willingness to raise concerns early so they can be addressed promptly. Learn more at [Investigations and findings](#).

In our supply chains, 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 gaps or findings, the process moves to a supplier issue escalation process. Where appropriate, 3M engages directly with suppliers to support their understanding of labor rights and expectations under the 3M Supplier Responsibility Code. We encourage suppliers to strengthen worker-engagement practices, including the establishment of grievance channels accessible to workers. 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. We may disqualify new or existing suppliers that have not demonstrated conformance with the Supplier Responsibility Code and do not commit to continual improvement toward meeting the requirements. Additional details can be found at [3M Supplier Direct](#).

### **Grievance mechanisms**

3MEthics.com is a 24-hour confidential online reporting system managed by an independent third-party vendor. Reports can be raised by 3M employees and others internally and externally. Reporters can choose to submit concerns anonymously in all countries where 3M has operations.

### **Modern slavery risk training**

3M provides global online compliance training covering the Code of Conduct and supporting policy documents, including those related to human rights.

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 are offered in languages appropriate for our employee population. Employees are assigned training modules based on their role and area of responsibility (marketing, human resources, security, etc.).

Ethics & Compliance tracks on-time and total completion rates. We continually analyze scores and other course data to shape future training needs. Ethics & Compliance courses are available through 3M Learn, 3M's corporatwide learning platform.

In addition to online training, the Ethics & Compliance Department — in close collaboration with 3M legal affairs, finance, human resources, and local compliance partners — provides frequent tailored live training to businesses, subsidiaries, staff groups, and third parties.

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, Acknowledgment of 3M Code of Conduct, and Human Trafficking Prevention.

## 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 and update risk management systems, 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
- Maintain public accessibility of 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 and Compliance](#), [3M Supplier Direct](#), and [3M UN Global Compact Communication on Progress](#).