

# United States Contingent Workforce 3M Worksite Access Requirements

## Table of Contents

### Section

- I. Introduction**
- II. Scope of Coverage**
- III. Contingent Worker and Supplier Requirements**
- IV. Requirements that apply to all U.S. Contingent Workers**
  - A. Policies that must be reviewed and acknowledged by the Contingent Worker**
  - B. Other Supplier obligations**
- V. Requirements that apply to specific Contingent Workers only**
  - A. Contingent Workers who work on export control issues**
  - B. Contingent Workers assigned to manufacturing operations**
  - C. Manufacturing, Laboratory and Engineering workers**
  - D. Contingent Workers assigned to mining operations**

### I. Introduction

3M utilizes Contingent Workers (formerly referred to as non-3M workers) as one part of its overall workforce strategy. A Contingent Worker is the employee of another organization or company, such as a temporary employment agency, who is on assignment at 3M. The Supplier is the employer of the Contingent Worker. The 3M Contact is the 3M employee responsible for the Contingent Worker while that Contingent Worker is on assignment at 3M.

In order to promote a productive and safe work environment at 3M locations and to comply with various laws, regulations and 3M policies, 3M has established access/pre-assignment requirements ("Requirements") for Contingent Workers and the companies that assign them to work at 3M (hereinafter referenced as "Supplier" or "Seller").

### II. Scope of Coverage

These Requirements apply to all U.S. based Contingent Workers requiring unescorted access to 3M facilities and/or access to 3M corporate systems, and as applicable, to Suppliers.

### III. Contingent Worker and Supplier Requirements

Contingent Workers requiring unescorted facility access or 3M internal system access must meet the applicable access/pre-assignment Requirements identified below, prior to the first day of assignment. The Supplier is responsible for ensuring that Contingent Workers assigned to 3M meet these requirements. 3M, as part of its Supplier contracts, may audit to ensure compliance.

### IV. Requirements that apply to all U.S. Contingent Workers

#### Policies that must be reviewed AND acknowledged by the Contingent Worker

##### **Anti-Bribery Policy**

All Contingent Workers will be required to review and sign their acknowledgement of 3M's [Contingent Workforce Anti-Bribery Policy](#). Suppliers are responsible for ensuring that this Requirement is met prior to the start of

## U.S. Contingent Workforce Access Requirements Cont.

assignment. Additional due diligence and 3M legal and/or business approvals are required if the contingent assignment includes acting on behalf of 3M to interact with government officials, public entities (e.g. university hospitals), government inspectors, entities that are partially or wholly government-owned, international organizations (U.N., Red Cross), or political parties/candidates. If the assignment includes those responsibilities, the 3M organization retaining Contingent Worker services should contact 3M Contingent Workforce Solutions (CWS).

### **Seller Personnel Agreement (Confidentiality Agreement)**

Contingent Workers are required to protect and maintain the confidentiality of 3M's confidential and proprietary information. Contingent Workers must sign an agreement containing confidentiality provisions, prior to the start of their 3M assignment. The [Seller Personnel Agreement](#) is the preferred confidentiality agreement for all Contingent Workers, and must be executed unless the confidentiality agreement obligation is addressed through another agreement already in place that includes confidentiality protections. Supplier will review the confidentiality obligations and agreement with the Contingent Worker, and obtain the Contingent Worker's signature prior to the start of the 3M assignment.

### **Beeline Data Privacy & Consent (Exhibit I)**

Suppliers of Contingent Hourly/Daily Workers will review the [Beeline Data Privacy and Consent](#) form with the Contingent Worker and obtain their signature prior to transmitting any personal information to 3M.

**NOTE:** *The form must be signed within thirty (30) days of the candidate's submission to the Beeline request.*

### **Access Control Policy**

3M desires to provide a safe and secure work environment for all individuals who do business with 3M. 3M policy is to control physical access to all 3M facilities and to create and maintain records of individuals entering and exiting 3M facilities. Suppliers of Contingent Workers working at 3M will review [3M's Contingent Workforce Access Control Policy](#) with the Contingent Worker and obtain their signature prior to the start of an assignment at 3M.

**NOTE:** *Contingent Workers in Offsite Third Party Worker assignments may be exempt if their access to 3M facilities is limited. Please consult with your CWS Staffing Consultant with questions.*

### **3M Policies**

Suppliers are also required to review the following additional 3M compliance policies and principles with their Contingent Worker: **Drug and Alcohol, Electronic Resource, Ethical Business Conduct, Violence Prevention, Harassment and Use of Cell Phones and Other Portable Electronic Devices When Driving.** The Contingent Worker should then sign the attached 3M Contingent Workforce Policies Acknowledgement form. All of these policies and the attached form are located within the [3M Contingent Workforce Policies](#) document.

## **Other Supplier Obligations**

### **Prohibited Parties List**

Suppliers of Contingent Workers must verify that the Contingent Worker is not on any of the U.S. Government's "Prohibited Parties Lists," which are: (a) the Commerce Department's Denied Persons List, Unverified List and Entity List; (b) the Treasury Department's Specially Designated Nationals List; and (c) the State Department's Debarred List and Nonproliferation Sanctions list. To access these lists, reference the Department of Commerce website at: <http://www.bis.doc.gov/complianceandenforcement/liststocheck.htm>

**Questions?** Contact 3M's Contingent Workforce Solutions Team at [3MCWS@hays.com](mailto:3MCWS@hays.com) or 1.844.468.8367

*Updated: 3/17/2016*

## U.S. Contingent Workforce Access Requirements Cont.

### Unique ID

In order to create a unique identification number in the Contingent Workforce System, Suppliers are required to provide the Contingent Worker's month and date of birth as well as the worker's middle initial. Suppliers assigning Contingent Workers to 3M should enter this information when entering their employees in the Contingent Workforce System; Suppliers providing service workers to 3M should provide this information to the 3M Requestor.

**NOTE:** All Contingent Workers should be submitted with their full legal name. Year of birth is NOT required and should NOT be provided.

### Age Verification

Suppliers must verify that their Contingent Worker assigned to 3M is 18 years of age or older; 3M is not asking for the Contingent Worker's specific age as part of this verification.

### Background Screening

Suppliers will perform background screening per 3M's requirements for being given unescorted access to 3M facilities and/or systems. A third party supplier will perform this service for Independent Contractors (please consult with your CWS Staffing Consultant). Only Contingent Workers who meet 3M's background screening requirements are eligible for assignment. A new background screen will be required for Contingent Workers with a break in service of six months or greater. If a contingent worker begins an assignment with a new supplier, the supplier will be required to initiate all onboarding requirements regardless of any break in service.

- Suppliers will verify that the Contingent Worker's social security number is both valid and active as defined by the U.S. Social Security Administration. In most cases, the Supplier's I-9 verification should meet this requirement. Suppliers will utilize the social security number to conduct both a national and county specific criminal background search for the previous seven years.
  - County searches must include all counties in which the Contingent Worker lived during the immediately preceding seven years. If Contingent Worker has lived in a non-US jurisdiction at any time during the immediately preceding seven years, Seller will also conduct criminal background checks in those jurisdictions to the extent the law in such jurisdictions allows
- Suppliers will verify highest level of education requirements as stated within the Contingent Workforce Solution's request. **ALL** Manufacturing, Warehouse & Maintenance contingent positions require a valid High School Diploma or G.E.D.
  - Verification Requirements: If the education requirement is unverifiable by the background screening vendor or remains in process after 3 business days, the contingent worker will be allowed to begin their assignment. If the education verification results are returned with negative information, the supplier must notify the MSP immediately and the contingent worker will be removed from their assignment within 24 hours.

Decisional background results for Contingent Workers in consideration for temporary assignment to 3M will be adjudicated against 3M's Decisional Background Matrix & reviewed by 3M for final approval. Please send the following information directly to [3MCWS@hays.com](mailto:3MCWS@hays.com) for Contingent Workers being considered for assignment:

- Candidate's Full Legal Name
- Contingent position (job title) for which the candidate is being considered
- Physical location for which the candidate is being considered
- Full background screening report
  - Partial background screening reports will not be accepted
  - Background screening report must include the candidate's name
  - Please remove any additional personal identifying information (i.e. SSN, date of birth)

**Questions?** Contact 3M's Contingent Workforce Solutions Team at [3MCWS@hays.com](mailto:3MCWS@hays.com) or 1.844.468.8367

Updated: 3/17/2016

## U.S. Contingent Workforce Access Requirements Cont.

**NOTE:** Any Contingent Worker being placed in a position that requires driving as part of the assignment will require a search of his/her driving record by the background screening vendor. Any moving violations are automatically considered 'decisional' and will need to be reviewed & approved by 3M prior to engaging the Contingent Worker on his/her assignment (see decisional background process).

### Drug Screening

Suppliers will perform the drug screen per [3M's Drug Screening Requirements](#). A third party supplier will perform this service for Independent Contractors. Only Contingent Workers who meet 3M's drug screening requirements are eligible for assignment. A new drug screening must be completed for Contingent Workers with a break in service of six months or greater. A drug screen is required for on-site Contingent Workers with a non-escort (i.e. yellow) badge. Off-site Contingent Workers who are granted systems access only are not required to complete a drug screening. Contingent Workers in Delivery Driver, Offsite Third Party Worker and Volunteer assignments may be exempt if their access to 3M facilities or corporate systems is limited.

**UPDATE:** Drug Screens for Contingent Workers must be initiated within **two full business days** of the offer being accepted in the Contingent Workforce System.

### Verification of Work Authorization

Suppliers of Contingent Workers will verify that Contingent Workers have valid U.S. work authorization. A third party supplier will verify U.S. work authorization for Independent Contractors. Only Contingent Workers with valid U.S. work authorization are eligible for assignment.

3M requires all suppliers to comply with applicable laws concerning work authorization. Suppliers may be exempt from detailed verification or audit requirements if placing Contingent Workers in Delivery Driver, Offsite Third Party Worker or Volunteer assignments as access to 3M facilities or systems is limited.

### Former 3M Employees and/or Former Contingent 3M Workers

Former 3M employees or former Contingent Workers may be ineligible for assignment. The Supplier is responsible for verifying with the worker if they have worked at 3M previously as an employee or Contingent Worker; Contingent Worker Suppliers should indicate this status in the resource's profile in the Contingent Workforce System, and service worker suppliers should provide this information to the 3M Requester. The Contingent Workforce Solutions program team will verify eligibility for assignment.

### Conflict of Interest: Former or Current Government Employee

Suppliers will comply with 3M's process if a Contingent Worker (or household member of a contingent worker - household member is defined as persons living with contingent worker on a regular basis) currently or ever has been employed by a U.S. Federal, State, Local or Foreign Government (either as a civilian or in the military), or in a Reserve or Guard component of the Armed Services, or in any other position that may either: (1) prevent the Contingent Worker from entering into a contract with 3M, or (2) place restrictions on what work assignments 3M may give the Contingent Worker due to U.S. Federal, State, Local or Foreign Government "revolving door" or conflict of interest laws. A third party supplier will perform this service for Independent Contractors.

- ✓ If the Contingent Worker indicates a positive response, the supplier will issue the [Conflict of Interest Questionnaire](#) to the Contingent Worker and will attach the completed questionnaire to the candidate's profile in the Contingent Workforce System for 3M review.
- ✓ Upon review, 3M will advise the supplier of any further requirements which may include additional questions.

**NOTE:** Contingent Workers in the following positions (job titles) are exempt: Cafeteria Worker, Construction/Maintenance, Custodian/Janitor, Delivery Driver, EAP Professional, Engineering Worker, IT Managed Service Offshore Worker, Mail/Shipping Handler, Manufacturing/Warehouse Material Handler, Occupational Health Professional, Offsite Third Party Worker, Service Worker, Supplier Representative, Trainer, Unpaid Worker and Volunteer. **Contingent Workers in the following job categories are exempt:** Manufacturing & Warehouse.

**Questions?** Contact 3M's Contingent Workforce Solutions Team at [3MCWS@hays.com](mailto:3MCWS@hays.com) or 1.844.468.8367

Updated: 3/17/2016

## U.S. Contingent Workforce Access Requirements Cont.

### **V. Requirements that apply to specific Contingent Workers only**

#### **Contingent Workers who work on Export Control issues**

As a global company, 3M must comply with various export regulations, collectively known as export controls. All 3M businesses must adhere to these regulations in order for 3M to sell or otherwise export from the U.S. certain products, technology, and equipment, as well as share certain export-controlled technology with "non-U.S. persons" within the United States. If an assignment is subject to export control requirements, suppliers of Contingent Workers will comply with 3M's export control process.

- 3M will notify suppliers if the assignment is subject to the export control requirements through the request in the Contingent Workforce System. If the assignment is subject, the Contingent Worker must disclose their country of birth, current citizenship(s) and the order in which they were obtained, if more than one.
- Suppliers will provide birth country and citizenship information, and any requested supplemental information, to 3M through the Contingent Workforce System via a completed [Export Control Template](#) in order for 3M to determine whether Contingent Workers are eligible for an export controlled assignment.

#### **Contingent Workers assigned to manufacturing operations**

All Contingent Workers in a Manufacturing or Warehouse assignment must meet requirements for the 3M Manufacturing Qualification Test to be eligible for assignment. Suppliers of Contingent Workers are required to administer this test to their Contingent Workers and deliver the results on a monthly basis to 3M Corporate's Talent Measurement Group. If a passing score is achieved, the worker is eligible for assignment. If a passing score is not achieved, a six-month waiting period is required before the worker can re-take the test.

- A passing score must be achieved prior to engaging the worker on assignment.
- MESP test results are retained on file for 10 years by 3M. Please contact your Staffing Consultant to verify record of test results for returning workers.
  - Suppliers will have their Contingent Worker complete the [MESP Signed Release Form](#) & will send to their Staffing Consultant to verify past results.

#### **Contingent Workers assigned to certain manufacturing, laboratory and engineering functions**

Specific baseline medical surveillance exams may be required for Contingent Workers in a Manufacturing, Warehouse, Laboratory, and/or Engineering positions prior to engaging the worker on assignment at 3M. 3M will notify suppliers of Contingent Workers that medical surveillance is needed and will provide the following information:

- List of what medical surveillance programs are needed
- Copy of medical surveillance protocols and test instructions if needed

Suppliers must provide all medical surveillance required by governmental agencies or 3M. It is the responsibility of the suppliers to arrange for needed medical surveillance and to ensure the evaluations are completed. Once the exams are completed, suppliers must provide the 3M location's HR Representative with a copy of the Medical Surveillance Certificate for each Contingent Worker.

- Medical Surveillance certificates are valid for 1 year and are retained on file for 7 years by 3M. Please contact your Staffing Consultant to verify certification status for returning workers (if under 1 year).

**UPDATE:** *If Medical Surveillance requirements are applicable, the Supplier will be required to have the worker complete the required exams and provide the completed certifications to the 3M location's HR Representative prior to the commencement of the Contingent Worker's assignment.*

#### **Contingent Workers assigned to mining operations**

Additional location specific MSHA access/pre-assignment requirements may be required. Please contact your 3M location's HR Representative for applicable location specific requirements

**Questions?** Contact 3M's Contingent Workforce Solutions Team at [3MCWS@hays.com](mailto:3MCWS@hays.com) or 1.844.468.8367

Updated: 3/17/2016

## U.S. Contingent Workforce Access Requirements Cont.

### 3M CWS Compliance Audit Matrix

3M may periodically request copies of documentation for audit purposes, but unless otherwise noted, suppliers should not send copies of the documentation to the 3M Requestors or locations. Documentation should be retained for a **minimum of seven years** after the Contingent Worker has completed his/her assignment at 3M.

DOCUMENT TITLE	ALL U.S. WORKERS	REQUIRED BASED ON ROLE	REQUIRED FOR	IF AUDITED, PLEASE RETURN
Anti-Bribery Policy	X		Offer Acceptance	Signed copy of document
3M Policies	X		Offer Acceptance	Signed copy of document <b>(last page only)</b>
Seller Personnel Agreement (Confidentiality Agreement)*	X		Offer Acceptance	Signed copy of document - *If providing a signed copy of The Seller Personnel Agreement, the Privacy Notice & Consent Regarding Personal Information Transfer and Storage Form is NOT required.
Beeline Data Privacy & Consent	X		Candidate Submission	Signed copy of document
Prohibited Parties List Verification	X		Offer Acceptance	Verification on your company's letterhead that your company has verified the worker does not appear on any Prohibited Parties Lists
Beeline Unique ID	X		Candidate Submission	Verification on your company's letterhead confirming that you have provided the CWS Team with the worker's legal first name, middle initial, birth month & birth day to make up the Unique ID
Age Verification	X		Candidate Submission	Verification on your company's letterhead confirming that the worker is 18 years of age or older <b>(no other documentation required)</b>
Access Control Policy		X	Offer Acceptance	Signed copy of document
Work Authorization Verification		X	Candidate Submission	Verification on your company's letterhead confirming that your company has verified the worker's authorization to work
Background Screen: national & criminal 7 year screen, education & driving record verification (if applicable)		X	Offer Acceptance	Provide a copy of the original background screening result (please block out any worker personal data including SSN, etc.). For any decisional backgrounds, please provide documentation of 3M's approval.
Drug Screen		X	Offer Acceptance	Provide a copy of the original drug screening result (please block out any worker personal data including SSN, etc.)
Conflict of Interest		X	Candidate Submission	Provide a copy of signed documents and the email confirmation from CWS/COI team indicating that the worker is clear.
Export Control		X	Offer Acceptance	Provide a copy of signed Export Control template verifying worker's citizenship status and Country of birth
MESP		X	Offer Acceptance	Records retained by 3M
Medical Surveillance		X	Offer Acceptance	Records retained by 3M

**Questions?** Contact 3M's Contingent Workforce Solutions Team at [3MCWS@hays.com](mailto:3MCWS@hays.com) or 1.844.468.8367

Updated: 3/17/2016