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**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**  
WASHINGTON, DC 20549

**FORM SD**

**Specialized Disclosure Report**

**3M COMPANY**

(Exact name of registrant as specified in Its charter)

**Delaware**

(State or other jurisdiction of incorporation)

**File No. 1-3285**

(Commission File Number)

**41-0417775**

(IRS Employer Identification No.)

**3M Center, St. Paul, Minnesota**

(Address of principal executive offices)

**55144-1000**

(Zip Code)

**Debora Fronczak, Vice President**

**3M Strategic Sourcing & Packaging Solutions (651) 733-1110**

(Name and telephone number, including area code, of the person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2019.

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## Section 1 — Conflict Minerals Disclosures

### Item 1.01 Conflict Minerals Disclosure and Report

This Specialized Disclosure Report (“Form SD”) for 3M Company (“3M,” “Company,” “we,” “our”) is provided in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (“Rule 13p-1”) for the reporting period from January 1 to December 31, 2019. References to 3M’s website are provided for convenience only, and its contents are not incorporated by reference into this Form SD or the Conflict Minerals Report, nor are they deemed filed with the U.S. Securities and Exchange Commission (“SEC”).

Conflict Minerals are defined by the SEC as cassiterite, columbite-tantalite, wolframite and gold, and their derivatives, which are limited to tin, tantalum and tungsten (collectively “3TG”). During calendar year 2019, 3M manufactured and contracted to manufacture products in which 3TG were necessary to the functionality or production of those products.

3M therefore conducted a “reasonable country of origin inquiry” (“RCOI”) to determine whether any of those minerals (1) originated in the Democratic Republic of Congo, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola (together, the “Covered Countries”); or (2) are from recycled or scrap sources.

#### A. Introduction:

1. 3M’s Business: 3M is a diversified technology company with a global presence in the following businesses: Safety & Industrial; Transportation & Electronics; Health Care; and Consumer. 3M is among the leading manufacturers of products for many of the markets it serves. These businesses have worldwide responsibility for virtually all 3M product lines.
2. 3M Supply Chains: 3M supply chains are complex, including thousands of suppliers spread over different tiers in those chains. Supplied materials are used in products serving numerous industry sectors. 3M is typically many tiers removed from smelters or refiners (“SORs”) that would have information on mines supplying 3TG. Moreover, to the extent 3TG are present in 3M products the content may be at trace levels. Supply chains have significantly improved their capacity to obtain and transmit SOR identities as compared to the first year that 3M conducted its 3TG supplier inquiry which reflects in part the value of the Responsible Minerals Initiative (“RMI”), in building cross-industry collaboration, due diligence guidance and common supplier inquiry templates that support a more robust infrastructure for multi-tier supply chain inquiry. Still, obtaining information regarding smelters, refiners and mine locations remains challenging. Challenges include delayed supplier responses, incomplete or inconsistent data, and in some cases the need for extensive supplier follow-up.
3. 3M’s Responsible Minerals Sourcing Policy: 3M first adopted a Conflict Minerals Policy in 2011. The Conflict Minerals Policy was updated in 2019 and renamed to Responsible Minerals Sourcing Policy (“Policy”) to include 3TG and cobalt and is available on the 3M Supplier Direct website ([https://www.3m.com/3M/en\\_US/suppliers-direct/](https://www.3m.com/3M/en_US/suppliers-direct/)) along with other information on 3M’s Responsible Minerals program. 3M is committed to responsible sourcing of 3TG and cobalt using the Organisation for Economic Cooperation and Development Guidance, so as not to support conflict or human rights abuses in the Covered Countries Conflict-Affected and High-Risk Areas, while avoiding de facto embargoes. This position is consistent with 3M’s Human Rights Policy Statement (<http://multimedia.3m.com/mws/media/10297050/human-rights-policy.pdf>) and 3M’s respect for human rights within our own operations and our supply chains, as well as United Nations Guiding Principles for Business and Human Rights. 3M is a signatory to the United Nations Global Compact and is aligned with the ten principles. The 3M Policy forms the basis for 3M’s Responsible Minerals program, and its requirements are communicated to 3M’s suppliers through annual outreach and in relevant global contract templates and U.S. purchase order terms and conditions which require suppliers to comply with applicable laws and our policies on responsible minerals. The 3M Supplier Direct website ([https://www.3m.com/3M/en\\_US/suppliers-direct/](https://www.3m.com/3M/en_US/suppliers-direct/)) contains training resources on various conflict minerals topics, including practical tips, best practices, and other relevant supplier information.
4. 3M’s Participation in Cross-Industry Efforts: As a downstream company that does not typically contract directly with 3TG SORs, 3M routinely collaborated with others in the industry through participation in RMI. RMI is a broad-based initiative that develops control systems regarding smelters and refiners through independently validated audits under RMI’s Responsible Minerals Assurance Process (“RMAP”). According to the RMI website, over 380 companies and associations across multiple industries participate in RMI. RMI also engages with a wide variety of organizations to discuss emerging issues, best practices and work on addressing shared

challenges across the supply chain. In furtherance of our commitment to industry collaborative controls, and in particular the RMAP program, 3M was one of the early donors to the RMI Initial Audit Fund (the “Fund”) to provide financial assistance to smelters for their first-year audit. The Fund is intended to reduce barriers to smelter participation in the RMAP. 3M has been a member of RMI since 2011 and was an active member of RMI throughout 2019. Members of 3M’s Responsible Minerals Steering Team participated in the RMI Due Diligence Practices Team, Plenary Team, Smelter Engagement Team, and attended the Responsible Business Alliance (“RBA”) and RMI Annual Conference to ensure alignment with program and strategies in 2019. 3M also encouraged suppliers, smelters and refiners to participate in RMI to expand common due diligence efforts. In addition, 3M, as well as its provider (as defined below), encouraged SORs identified in 3M’s supply chain but non-conformant to RMAP to enroll and participate in RMAP.

## **B. Description of RCOI:**

1. RCOI Elements: The elements of 3M’s RCOI are identification and prioritization of suppliers, supplier data collection, and an assessment of supplier data to determine whether further due diligence is required.
  2. Prioritized Supplier Inquiry: In view of 3M’s complex and extensive supply chains, 3M determined that a reasonably designed and good faith inquiry should focus on higher priority suppliers consistent with RMI’s Five Practical Steps to Support SEC Conflict Minerals Disclosure. 3M designated approximately 47 employees globally as “Responsible Minerals Advisors” (“RMAs”). The RMAs and many other knowledgeable 3M personnel identified products containing 3TG necessary to the functionality or production of those products (“Necessary 3TG”), including products from covered acquisitions. This process resulted in many product families and individual products being screened out from further inquiry, as not containing Necessary 3TG. Through the screening process, the RMAs and other 3M personnel determined to the best of their knowledge that the following product categories may contain Necessary 3TG:
    - Electrical connectors, cables and cords, electronic chargers, controls, monitors and plated circuitry
    - Products that include these and other electrical or electronic components
    - Metallized films and tapes
    - Some orthodontic products
    - Fall protection equipment
    - Fire safety equipment
- 3M then prioritized its review of these products that may contain Necessary 3TG and the corresponding supply chains taking into account various factors such as estimated content of 3TG, type of mineral, amount of spend, the nature of the supply chain, and supplier location. 3M conducted outreach with suppliers for products that may contain Necessary 3TG, which represented 92% of the in-scope supplier spend in 2019.
3. Data Collection: Once the relevant higher priority suppliers (“Supplier Group”) were identified, 3M asked the Supplier Group to provide information about the Necessary 3TG in their products based on responses to the industry standard RMI Conflict Minerals Reporting Template (“CMRT”). 3M engaged a third-party service provider (“provider”) to assist with Supplier Group outreach as well as engagement with data collection and validation. Accordingly, the CMRT was deployed to the Supplier Group through 3M’s provider’s web portal. That system issued four automatic follow-up reminders to those in the Supplier Group who had not responded to the information requested. Additional direct mail reminders were sent to those in the Supplier Group who had not responded, and follow-up phone calls were made with prioritized suppliers. As part of these phone calls, 3M offered training to the supplier on topics including the importance of the information requested by 3M, the disclosure requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act conflict minerals legislation, and how to attach the CMRT into 3M’s provider’s web portal. In addition, follow-up reminders were sent as an escalation to those in the Supplier Group who had discrepancies in their CMRT. Outbound communications were conducted in native languages such as: English, German, simplified-Chinese, French, Italian, Spanish, Portuguese, and Japanese to best collaborate with suppliers to ensure expectations were understood.
  4. Data Validation: 3M and its provider conducted data validation on all submitted CMRTs and retained them for recordkeeping purposes. The goal of data validation is to increase the completeness and accuracy of the submissions and to identify any contradictory responses in the CMRT. 3M’s provider reviewed the responses to determine where further engagement with suppliers was warranted. Those responses were then escalated to 3M for additional due diligence and follow-up. We considered untimely or incomplete responses as well as inconsistencies with the data reported in the CMRT in making this determination. For any CMRT that was

determined invalid based on this review, the provider's web platform automatically sent the supplier an email outlining any validation issues with the CMRT question logic or missing fields. 3M's provider proactively engaged suppliers to educate them on the validity requirements, how to enter CMRT data and/or 3M's expectation on CMRT information, as appropriate. The provider's web portal links to training resources and conflict minerals templates, practical tips, and best practices.

If there were discrepancies in expected mineral content for suppliers responding that materials contained Necessary 3TG, additional information and follow-up was conducted with the supplier to clear the discrepancy. Where appropriate, the provider asked the supplier to submit a new CMRT or revised documentation after such follow-up.

For those suppliers that indicated in their CMRTs that they did not have certain aspects of a conflict minerals program, such as a conflict minerals policy or implementation of due diligence measures for conflict-free sourcing, the CMRTs were still considered valid. However, the provider applied a "strength indicator" identifying if the supplier's answer on their CMRT indicated a strong or weak conflict minerals program.

With respect to data validation on SOR-related information listed in the submitted CMRTs, the provider's smelter team compared the SOR names and SOR country locations provided in the suppliers' submitted CMRTs to the SOR names and SOR country locations that are listed on the "smelter reference list" provided in the RMI-CMRT template form.

The provider validated whether any 3TG sourced from the Covered Countries is conflict-free based on the information provided by our Supplier Group, by RMI and similar gold refining industry auditing programs (London Bullion Market Association and Responsible Jewellery Council), through RMI RCOI data and by other information available on RMI's website.

Based on the responses received to the Company's RCOI, which included thousands of alleged SOR names, and information on SOR names, locations and associated countries of origin from the RMI-RCOI data set (to which we have access as a member of RMI), 3M compiled a list of 297 verified, unique SORs, including information regarding associated countries of origin. 3M and its provider performed due diligence on the SORs that were known or reasonably believed to have sourced from the Covered Countries, or that had unknown sourcing as described in the attached Conflict Minerals Report.

### **C. Results of RCOI**

Downstream companies such as 3M are not likely to have direct information on the sources of minerals upstream of the SORs in their supply chains. Instead, downstream companies rely on available information regarding SORs identified through supplier inquiry. Accordingly, 3M and its provider reviewed supplier responses resulting from the inquiry described in Paragraphs B.3 and B.4 above as well as information from capacity-building interactions and efforts with suppliers to elicit responses and encourage development of conflict minerals programs. These supplier responses and the capacity-building efforts affirmed information on supply chain maturity gathered through participation in the RMI program and other industry associations. 3M has received substantially more SOR names from the Supplier Group in recent years as compared to the beginning of the program. 3M achieved a response rate from suppliers that was greater than 80%, which we believe is an indication of significant progress in the multi-tiered supply chains' capacity to pass 3TG-related inquiries and information on SORs up and down those supply chains. As a downstream company typically several tiers from SORs, 3M relied on information from direct suppliers, many of them smaller and private companies. The information received on SOR names from direct suppliers suggested that these direct suppliers had made progress in building their conflict minerals programs and capacities to transmit conflict mineral information during 2019.

### **D. Conclusion**

Based on its RCOI 3M has reason to believe that a portion of its Necessary 3TG may have originated in the Covered Countries and has reason to believe that those Necessary 3TG minerals may not be from recycled or scrap sources. Accordingly, 3M and its provider conducted further due diligence on the source and chain of custody of Necessary 3TG contained in products supplied by the Supplier Group.

In accord with Rule 13p-1, 3M has filed this Form SD and the associated Conflict Minerals Report and both reports are posted to 3M's Supplier Direct website ([https://www.3m.com/3M/en\\_US/suppliers-direct/](https://www.3m.com/3M/en_US/suppliers-direct/)).

**Item 1.02 Exhibit**

The Conflict Minerals Report required by Item 1.01 is filed as Exhibit 1.01 to this Form SD.

**Section 2 Exhibits**

**Item 2.01 Exhibits**

Exhibit 1.01 — Conflict Minerals Report for the period January 1 to December 31, 2019, as required by Items 1.01 and 1.02 of this Form SD.

**SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

3M COMPANY

/s/ Eric Hammes

By: Eric Hammes  
Executive Vice President, Enterprise Operations

May 31, 2020  
(Date)

## CONFLICT MINERALS REPORT OF 3M COMPANY

FOR THE YEAR ENDED DECEMBER 31, 2019

**INTRODUCTION**

This Conflict Minerals Report for 3M Company (“3M”, “Company,” “we,” “our”) is provided in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 for the reporting period from January 1 to December 31, 2019.

Conflict Minerals are defined by the Securities and Exchange Commission (“SEC”) as cassiterite, columbite-tantalite, wolframite and gold, and their derivatives, which are limited to tin, tantalum and tungsten (collectively “3TG”). As a result of the Company’s reasonable country of origin inquiry (“RCOI”) for the period January 1 to December 31, 2019 described in the attached Specialized Disclosure Report (“Form SD”), 3M has reason to believe that a portion of the 3TG necessary to the functionality or production of products (“Necessary 3TG”) that we manufactured or contracted to manufacture during the period between January 1, 2019 and December 31, 2019 may have originated in the Democratic Republic of Congo (“DRC”), the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola (together, the “Covered Countries”) and those Necessary 3TG may not be from recycled or scrap sources.

3M has actively engaged with its customers and suppliers for several years with respect to the use of conflict minerals. 3M adopted a conflict minerals policy articulating the conflict minerals supply chain due diligence process and 3M’s commitments to reporting obligations regarding conflict minerals. The policy is available on 3M’s Supplier Direct website ([https://www.3m.com/3M/en\\_US/suppliers-direct/](https://www.3m.com/3M/en_US/suppliers-direct/)).

3M has contributed to industry efforts to address conflict minerals through serving as a member of the Responsible Business Alliance (“RBA”) and the Responsible Minerals Initiative (“RMI”). This engagement and the contributions made have helped develop standards, best practices, and tools that benefit all companies working to end the association between 3TG and conflict in the Covered Countries.

**REASONABLE COUNTRY OF ORIGIN INQUIRY**

Many essential products in the 3M businesses, such as electronics, personal safety or transportation, rely on 3TG. The following are examples of product families that often include 3TG:

- Electrical connectors, cables and cords, electronic chargers, controls, monitors and plated circuitry
- Products that include these and other electrical or electronic components
- Metallized films and tapes
- Some orthodontic products
- Fall protection equipment
- Fire safety equipment

3M therefore conducted due diligence on the source and chain of custody of Necessary 3TG as described below, using the following due diligence management system: To determine whether Necessary 3TG in products originated in Covered Countries, 3M retained a third-party service provider (“provider”) to assist us in reviewing the supply chain and identifying risks. 3M provided a list composed of suppliers and parts associated with the in-scope products to the provider for upload to their database to assist with reasonable country of origin of potential product families such as those noted above.



To collect data on the materials’ sources of origin procured by the supply chain, 3M utilized RMI’s Conflict Minerals Reporting Template (“CMRT”) version 5.12 to conduct a survey of all in-scope suppliers.

During the supplier survey, 3M contacted suppliers via the provider’s software-as-a-service (SaaS) platform that enables users to complete and track supplier communications and allows suppliers to upload completed CMRTs directly to the platform for validation, assessment and management. The database also provides functionality that meets the OECD Guidance (as defined

below) process expectations by evaluating the quality of each supplier response and assigning a health score based on the supplier's declaration of process engagement. Additionally, the metrics provided in this report, as well as the step-by-step process for supplier engagement and upstream due diligence investigations performed are managed through this platform.

Via the database and provider, 3M requested that all suppliers complete a CMRT. Training and education to guide suppliers on best practices and the use of this template was included. The provider monitored and tracked all communications in the database for future reporting and transparency. 3M directly contacted suppliers that were unresponsive to the provider's communications during the diligence process and requested these suppliers complete the CMRT and submit it to the provider.

3M's program included automated data validation on all submitted CMRTs. The goal of data validation is to increase the accuracy of submissions and identify any contradictory answers in the CMRT. This data validation is based on questions within the declaration tab of the CMRT which helps to identify areas that require further classification or risk assessment, as well as understand the due diligence efforts of the Tier 1 suppliers. The results of this data validation contribute to the program's health assessment and are shared with the suppliers to ensure they understand areas that require clarification or improvement.

All submitted forms were accepted and classified as valid or invalid so that data is retained. Examples of invalid submissions may include: incomplete, inaccurate, or inconsistent data. Further due diligence is implemented with suppliers providing invalid forms and are requested to submit a valid form. Suppliers were also provided with guidance on how to correct these validation errors in the form of feedback to their CMRT submission, training courses and direct engagement help through the provider's multilingual Supplier Experience team.

Based on the findings through the RCOI process, 3M was able to determine the countries of origin for a large portion of the 3TG in its products. As such, 3M continued to perform further due diligence on the source and chain of custody of the minerals in question.

## **DUE DILIGENCE MEASURES**

### **A. Design of Our Due Diligence Measures**

Our Conflict Minerals due diligence management system has been designed to conform in all material respects with the Organisation for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance"), as applicable for 3TG and downstream companies (as the term "downstream companies" is defined in the OECD Guidance).

### **B. Due Diligence Performed**

#### **1. Establish Strong Company Management Systems**

##### **Responsible Minerals (Conflict Minerals) Sourcing Policy**

3M first adopted a Conflict Minerals Policy in 2011. The Conflict Minerals Policy was updated in 2019 and renamed to Responsible Minerals Sourcing Policy ("Policy") to include 3TG and cobalt and is available on 3M's Supplier Direct website ([https://www.3m.com/3M/en\\_US/suppliers-direct/](https://www.3m.com/3M/en_US/suppliers-direct/)) along with other information on 3M's Responsible Minerals program.

3M is committed to responsible sourcing of 3TG and cobalt using the OECD due diligence framework, so as not to support conflict or human rights abuses in the Covered Countries or Conflict-Affected and High-Risk Areas ("CAHRAs"), while avoiding de facto embargoes. This position is consistent with 3M's Human Rights Policy (<http://multimedia.3m.com/mws/media/1029705O/human-rights-policy.pdf>) and 3M's respect for human rights in our own operations and our supply chains, as well as with the OECD Guidance and United Nations Guiding Principles on Business and Human Rights.

##### **Internal Management System**

3M has established a management system to support the effective and efficient execution of our Responsible Minerals program. 3M's management system includes an executive sponsor: 3M's Senior Vice President, Enterprise Operations. In addition, 3M has designated a cross-functional Responsible Minerals Steering Team ("Steering Team"), composed of representatives from Strategic Sourcing, Regional Responsible Sourcing Leaders, and 3M Legal Affairs. The Steering Team has responsibility for developing and implementing 3M's Policy, compliance strategy, as well as reviewing the progress, effectiveness and continual improvement of the program. The Steering Team is led by a Responsible Minerals Program Manager ("Program Manager") from 3M Strategic Sourcing.

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Senior leadership of Strategic Sourcing, Finance, Corporate Audit, Compliance and Business Conduct, and Human Resources is briefed bi-annually about the results of our due diligence efforts, including evaluation of risks and risk mitigation measures. These briefings also include an evaluation of the progress, effectiveness and execution of our Policy and Responsible Minerals program.

3M's provider assisted with evaluating supply chain information regarding 3TG, identifying potential risks, and in the development and implementation of additional due diligence steps that 3M will undertake with suppliers with regard to conflict minerals.

3M leveraged the provider's managed service team made up of dedicated program specialists who supported 3M's conflict minerals program. 3M communicated regularly with the provider in order to receive updates on program status. Each member of the provider's team is trained in conflict minerals compliance and understands the intricacies of the CMRT and conflict minerals reporting, as well as Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank Act").

### **Control System and Supply Chain Transparency**

3M's Supplier Responsibility Code ("SRC") ([https://www.3m.com/3M/en\\_US/suppliers-direct/supplier-requirements/global-supplier-responsibility-code/](https://www.3m.com/3M/en_US/suppliers-direct/supplier-requirements/global-supplier-responsibility-code/)) applies to all suppliers and outlines 3M's expectations as it relates to labor, ethics, environmental health and safety as well as management systems. This code of conduct is based on industry and internationally-accepted principles such as the United Nations Guiding Principles on Business and Human Rights and the OECD Guidance. If a supplier does not meet 3M's requirements, the situation is escalated and evaluated for disposition.

3M global suppliers are expected to supply materials to 3M that are "Conflict-Free," meaning minerals that are from recycled or scrap sources or that do not directly or indirectly finance armed groups through mining or mineral trading in the DRC, adjoining countries or any other CAHRAs as determined by regulatory bodies and as applied by RMI. This expectation is communicated in 3M contract agreement templates and U.S. purchase order terms & conditions. 3M relies on direct suppliers to provide information on the origin of the 3TG contained in components and materials supplied, including sources of 3TG that are supplied to them from lower-tier suppliers.

3M is a member of RMI, which provides strong industry collaboration and greater visibility to supply chain risks. 3M gathered information on the use of 3TG by the Supplier Group (as defined in the Supplier Engagement section) using RMI's CMRT. 3M engaged the provider to assist with Supplier Group outreach and engagement and with data collection and validation. 3M used the provider's web portal to determine the chain of custody of the Necessary 3TG included in our products, with a focus on identifying smelters and refiners ("SORs") in their respective supply chains.

### **Supplier Engagement**

3M identified relevant suppliers that supply products that may contain Necessary 3TG. 3M has determined that a reasonably designed inquiry for identifying and assessing supply chain risks should focus on higher priority suppliers consistent with RMI's Five Practical Steps to Support SEC Conflict Minerals Disclosure. 3M identified the relevant higher priority suppliers ("Supplier Group") by prioritizing its review of products that may contain Necessary 3TG, and the corresponding supply chains, accounting for various factors such as estimated content of Necessary 3TG, type of mineral, amount of spend, the nature of the supply chain, and supplier location. In 2019 3M conducted outreach with suppliers for products that may contain Necessary 3TG, which represented 92% of the in-scope supplier spend.

3M's provider reviewed the Supplier Group CMRT responses to determine where further engagement with suppliers was warranted. Those responses were then escalated to 3M for additional due diligence and follow-up. We considered untimely or incomplete responses as well as inconsistencies with the data reported in the CMRT in making this determination. For any CMRT that was determined invalid based on this review, the provider's platform automatically sent the supplier an email outlining any validation issues with the CMRT question logic or missing fields. 3M's provider proactively engaged suppliers to educate them on the validity requirements, how to enter CMRT data, and/or 3M's expectation on CMRT information, as appropriate. Suppliers were educated on 3M's provider's supplier portal links, which provides training resources, reporting templates, practical tips, and best practices.

3M established controls and transparency by creating a process in coordination with the provider to engage relevant suppliers to identify SORs contained in 3M's supply chain. We communicated expectations to these relevant suppliers in connection with our inquiry requesting they send a similar request to their direct suppliers to obtain the information successively upstream to the smelter or refiner. A provider web portal was utilized for the collection of CMRTs. Suppliers were provided a link to 3M's Supplier Direct website ([https://www.3m.com/3M/en\\_US/suppliers-direct/](https://www.3m.com/3M/en_US/suppliers-direct/)) where we communicate supplier responsibility expectations, have links to our Supplier Learning Academy, which includes links to training resources, practical tips, and best practices. 3M encourages all suppliers to have a proactive approach in aligning with 3M's policies and programs to strengthen our supply chain to ensure conformance to regulations. Because 3M believes in developing strong and sustainable relationships, it is important our business partners understand 3M's

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commitment to doing business ethically and in compliance with the law.

For suppliers that identified “red-flagged” SORs in their CMRT responses, according to indicators defined in the OECD Guidance, 3M and its provider requested additional information on those suppliers’ conflict minerals due diligence standards and processes, including further due diligence about the “red-flag” SORs. In addition, these suppliers were provided a link to educational courses on smelter risk mitigation.

3M’s requirements related to responsible minerals in relevant global contract templates and U.S. purchase order terms and conditions require suppliers to comply with applicable laws and our policies on responsible minerals. This includes participation in a supply chain survey and related due diligence activities, and to provide upon request, information on SORs in relevant supply chains and other information 3M might require.

3M’s Policy expects suppliers to responsibly source 3TG and cobalt through SORs that comply with recognized assurance programs including RMI, the London Bullion Market Association (“LBMA”), and the Responsible Jewellery Council (“RJC”). For SORs identified by the Supplier Group not currently engaged in an assurance program, 3M sent letters to those SORs encouraging them to participate. 3M also encouraged our Supplier Group and in certain cases customers to reach out to those SORs and encourage their participation. In addition, communications were sent to those SORs in our supply chain who were conformant but had not been designated as progressing or having a re-audit in progress within three months of their conformance date.

3M also encourages suppliers to draw upon internationally recognized standards to advance social and environmental responsibility and business ethics. All existing and future suppliers are required to conform to 3M’s SRC, demonstrating their commitment to share 3M’s values on social and environmentally sustainable operations and practices, which include labor, ethics, environmental health and safety as well as management systems. The SRC is based upon the RBA framework. 3M uses several external indices, such as the International Labour Organization, Global Slavery Index, and the Corruption Perception Index, to assist with prioritization of higher risk suppliers.

In partnership with 3M’s service provider, 3M has put a strong emphasis on supplier education and training. This includes guiding suppliers to online resources, including access to interactive training courses, informational and best practice documents and real time chat with compliance specialists.

### **Grievance Mechanism**

We have a grievance mechanism whereby employees and suppliers can report concerns regarding 3M’s business conduct and other matters, at [3M-ethics.com](https://secure.ethicspoint.com/domain/media/en/gui/8897/index.html) (<https://secure.ethicspoint.com/domain/media/en/gui/8897/index.html>). We have procedures in place for follow-up in the event any responsible minerals issues are raised through our grievance mechanism.

SORs and other external stakeholders also may use RMI’s Grievance and Complaints Mechanism (“RMI Mechanism”). The RMI Mechanism allows stakeholders to raise concerns about the RMI Responsible Minerals Assurance Process (“RMAP”) audit process, protocols, and SOR operations that fall within the scope of the RMAP, audit quality, and auditor competencies, mineral supply chains and upstream/downstream initiatives, as well as mineral sourcing activities and due diligence of RMI member companies.

### **Maintain Records**

We have a record retention policy applicable to conflict minerals-related documentation that provides for retention for a minimum of ten years. 3M’s provider’s document retention policy includes 3M conflict minerals related documents, including supplier responses to CMRTs as well as the sources identified within each reporting period.

## **2. Identify and Assess Risk in the Supply Chain**

As part of the process of identifying and assessing risks in the supply chain, 3M asked the Supplier Group to share information about the Necessary 3TG in their products provided to 3M based on responses to the industry standard RMI CMRT. 3M deployed the CMRT to the Supplier Group through the provider’s supplier’s web portal. That system issued four automatic follow-up reminders to those in the Supplier Group who had not responded to the information requested. Additional direct mail reminders were sent to those in the Supplier Group who had not responded, and follow-up phone calls were made with prioritized suppliers. As part of these phone calls, 3M offered training to the supplier on topics including the importance of the information requested by 3M, the disclosure requirements of the Dodd-Frank Act conflict minerals legislation, and how to attach the CMRT into 3M’s provider’s web portal. In addition, follow-up reminders were sent as an escalation to those in the Supplier Group who had discrepancies in their CMRTs. Outbound communications were conducted in native languages such as: English, German, simplified Chinese, French, Italian, Spanish, Portuguese, and Japanese to best collaborate with suppliers to ensure expectations were understood. If supplier responses indicated

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that Necessary 3TG contained in products provided to 3M may have originated from the Covered Countries, had unknown sourcing or may have been processed by SORs that have not been validated as using DRC conflict free sourcing practices, then such responses were escalated to the Steering Team for further review and determination of follow-up steps.

3M does not have a direct relationship with SORs and does not perform direct audits of these entities within the supply chain. Smelters that have completed an RMAP audit are considered to be DRC conflict free. In cases where the smelter's due diligence practices have not been audited against the RMAP standard or they are considered non-conformant by RMAP, follow-ups are made to suppliers reporting those facilities. Smelters are then assessed for the potential for sourcing risk.

Each facility that meets the definition of a smelter or refiner of a 3TG mineral is assessed according to red-flag indicators defined in the OECD Guidance. The provider uses numerous factors to determine the level of risk that each smelter poses to the supply chain by identifying red flags. These factors include:

- Geographic proximity to the DRC and Covered Countries.
- Known mineral source country of origin.
- RMAP audit status.
- Credible evidence of unethical or conflict sourcing.
- Peer assessments conducted by credible third-party sources.

Suppliers are also evaluated on program strength, which assists in making key risk mitigation decisions as the program progresses. The criteria used to evaluate the strength of the program is based on certain questions in the CMRT related to the suppliers' conflict minerals practices and policies.

We verified SORs using RMI's Conformant Smelters and Refiners list. We also referred to other sources of information, including publications of the LBMA and the RJC, to validate and assess potential risks.

### **3. Design and Implement a Strategy to Respond to Identified Risks**

3M has designed and implemented a strategy to respond to risks. The Program Manager works with the Steering Team and its executive sponsor, providing periodic updates or escalating issues to relevant executives of any findings where a supplier in the Supplier Group identifies a SOR processing Necessary 3TG for 3M products that sources from or may source from the Covered Countries.

The provider's risk mitigation activities are initiated whenever a supplier's CMRT reported facilities of concern. Through the provider, suppliers with submissions that included any smelters of concern were immediately given feedback instructing the supplier to take their own independent risk mitigation actions. Examples include the submission of a product-specific CMRT to better identify the connection to products that they supply to 3M. Additional escalation may have been necessary to address any continued sourcing from these smelters of concern. Suppliers are given clear performance objectives within reasonable timeframes with the ultimate goal of progressive elimination of these smelters of concern from the supply chain. In addition, suppliers are guided to the educational materials, located on the provider's website, on mitigating the risks identified through the data collection process.

If additional escalation is required, the Program Manager works with the Steering Team and its executive sponsor, or other relevant executives, to determine appropriate follow-up actions, if any, to mitigate risks. Follow-up actions based upon the variety of supplier risk levels may include additional due diligence by the Steering Team. 3M and its provider may communicate directly with its suppliers that have not yet been determined to be conformant with RMAP in order to request sourcing information and encourage their involvement with the RMI Program. As part of the due diligence activities we may decide to find alternate sources of supply and/or suspend or terminate existing supplier relationships after failed attempts at mitigation or remediation. For the year 2019, 3M found no instances where it was necessary to find replacement sources of supply, or to suspend or terminate a supplier relationship.

### **4. Carry out Independent Third-Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain**

3M utilized information provided by the independent third-party audits of SORs through RMAP, LBMA and the RJC to determine whether any Necessary 3TG sourced from the Covered Countries is validated as "Conflict-Free" using RMI's RCOI data. In addition, members of the Steering Team participate in RMI's Due Diligence Practices Team, Plenary Team, Smelter Engagement Team and Risk Readiness User Group, which keeps 3M informed of new auditing standards, emerging risks, and risk assessment methods.

3M's provider directly contacted SORs that are not currently enrolled in the RMAP to encourage their participation and

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gather information regarding each facility's sourcing practices on behalf of its compliance partners. 3M is a signatory of this communication in accordance with the requirements of downstream companies detailed in the OECD Guidance.

Through 3M's membership with the RMI, SORs have been encouraged to participate in the RMAP. Any SORs that were reported by suppliers who were not part of the RMAP were also contacted directly by 3M's provider to encourage them to participate in the RMAP.

## **5. Report on Supply Chain Due Diligence**

3M has published the Form SD and Conflict Minerals Report for the year ended December 31, 2019. These reports are publicly available within the Responsible Minerals section of 3M's Supplier Direct website ([https://www.3m.com/3M/en\\_US/suppliers-direct/](https://www.3m.com/3M/en_US/suppliers-direct/)). The reference to 3M's website is provided for convenience only, and its contents are not incorporated by reference into this Report and Form SD nor deemed filed with the SEC.

### **RESULTS OF DUE DILIGENCE**

Based on our RCOI described in our Form SD and the other aspects of our due diligence program described above, 3M evaluated the Supplier Group responses to the CMRT based supplier inquiry. As a result of the RCOI activity, 3M has reason to believe that a portion of its Necessary 3TG may have originated in the Covered Countries and those Necessary 3TG may not be from recycled or scrap sources. However, after conducting further due diligence, 3M determined that based on SOR information provided by the Supplier Group and information available to 3M as a member of RMI, the 13 SORs identified as sourcing from those Covered Countries have been validated as conformant to RMAP protocols.

As outlined in the OECD Guidance, the internationally-recognized standard on which 3M's system is based, we support RMI's RMAP process that audits SORs' due diligence activities. The source of information for certain statements in this declaration was obtained through our membership in RMI, using the RCOI report for member "mmmco."

### **Supply Chain Outreach Results**

Supply chain outreach is required to identify the upstream sources of origin of tin, tantalum, tungsten and gold. Following the industry standard process, CMRTs were sent to and requested from Tier 1 suppliers, who are expected to follow this process until the SOR sources are identified. In 2019, 3M received 80% response rate from its suppliers as a result of outreach efforts.

### **Upstream Data Transparency**

All SORs listed by suppliers in completed CMRTs, which appear on the RMI-maintained smelters list, are attached in Annex I. As is a common practice when requests are sent upstream in the supply chain, those who purchase materials from smelters may not be able to discern exactly which company's product lines the materials may end up in. As a result, those providing the SORs have the practice to list all SORs they may purchase from within the reporting period. Therefore, the SORs (as sources) listed in Annex I are likely to be more comprehensive than the list of SORs which actually processed the 3TG contained in 3M's products.

Suppliers that identified these specific smelters of concern on their CMRT were contacted in accordance with the OECD Guidance to inform them of the potential for risk, and to evaluate whether or not these smelters could be connected to 3M's products. The suppliers were asked to complete a user-defined or product-level CMRT specific to the materials, products or piece parts purchased by 3M, rather than a company-level CMRT, to better identify the connection to products that they supply to 3M. Other suppliers were evaluated internally to determine if they were in fact still active suppliers. If not, they were removed from the scope of data collection.

### **Countries of Origin**

Annex II includes an aggregated list of countries of origin from which the reported facilities collectively source 3TG, based on information provided through the CMRT data collection process, from direct smelter outreach and the RMAP. As mentioned in the above section, it is understood that many responses may provide more data than can be directly linked to products sold by 3M, therefore, Annex II may contain more countries than those that 3M's products are being sourced from.

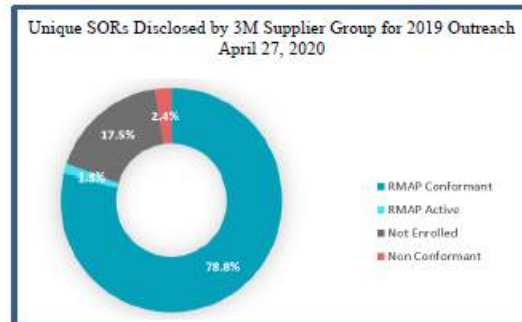
### **Information on Smelters or Refiners**

The CMRT requested the Supplier Group and its suppliers provide 3M with information on the SORs providing Necessary 3TG to 3M. Because 3M typically does not have a direct relationship with the facilities used to process 3TG, we must rely on information provided by the Supplier Group. Some suppliers in the Supplier Group provided information on all SORs

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used by the supplier but could not provide information linking specific SORs used to process Necessary 3TG in products supplied to 3M. We verified 297 unique SOR names among these mentions, based on information listed on the RMI website. Of these unique SORs, 234 (79%) are validated as conformant to the RMAP process as of April 27, 2020, and 4 (2%) are reported as active by RMI, meaning they are engaged in the RMAP program but not yet conformant as of April 27, 2020. 3M's Supplier Group identified 94% of the total number of conformant SORs listed on RMI's website in their supply chains. Based on our involvement in the RMI Due Diligence Practices Team and the RMI Smelter Engagement Team as well as resources available to us through our membership in RMI, 3M believes the number of SORs conformant to RMAP process is attributable in part to industry collaborative efforts through RMI and other third-party validation programs.

We monitored and tracked SORs that we identified as not having received a "Conflict-Free" designation or not having begun participating in an independent third-party assurance process. During this reporting year, we identified 52 (18%) SOR facilities that were not participating in an independent third-party assurance process. These facilities received letters from 3M encouraging their participation.



### Efforts to Determine the Country of Origin or Mine of Origin

In order to determine country or mine of origin, 3M: (a) seeks information about 3TG SORs in our supply chain through use of the CMRT questions; and (b) utilizes information from the RMAP and its independent audits of SORs, as well as information from that effort made available by RMI publicly and to its members. 3M's Supplier Group did not provide information on mines of origin for Necessary 3TG used in 3M products manufactured during 2019. 3M does not have sufficient information to conclusively determine the mines or the countries of origin of the Necessary 3TG in its products or whether the Necessary 3TG are from recycled or scrap sources. However, based on SOR information provided by the Supplier Group through the CMRT responses, as well as RMI information available to its members, the countries of origin of 3TG associated with SORs identified to 3M by the Supplier Group are believed to include the countries listed in Annex II below. While some countries listed in Annex II are Covered Countries, 3M validated that 24 SORs identified as sourcing from those Covered Countries are conformant to RMAP.

### Additional Due Diligence

3M compared the overall set of SORs identified by the Supplier Group against RMI's RCOI list dated April 27, 2020, to identify all names and mineral sourcing for SORs that are conformant with the RMAP protocols and have been validated by a third-party auditor. The RCOI list also identified SORs participating in other assurance programs where the mineral sourcing of SORs is not disclosed.

For the 59 SORs identified to 3M by the Supplier Group in 2019 that are not yet engaged in the RMAP as active or validated as conformant to RMAP or by any other independent third-party programs, 3M conducted further due diligence to confirm whether those SORs processed Necessary 3TG used in products provided to 3M. In addition, 3M conducted due diligence through other means using a variety of information sources from RMI and others searching for evidence of SORs sourcing from the Covered Countries or potentially contributing to conflict in the Covered Countries. Such additional sources of information included news articles, reports published by NGOs, and/or industry association information that may indicate locations from which a SOR sources. For SORs not independently verified, geographic location and mining production by country are reviewed, and specified factors are applied to determine risk levels. As noted above, 3M and industry efforts persuaded one SOR to participate in RMAP and become conformant.

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3M will take additional mitigating action if we learn of credible information that identified SORs are potentially financing armed groups in the Covered Countries. We require our suppliers to conduct additional due diligence to confirm the presence of any of these red-flagged SORs in the chain of custody for Necessary 3TG in products supplied to 3M.

#### STEPS TO IMPROVE DUE DILIGENCE

3M is alert for facts and circumstances that may require SOR-related risk mitigation. 3M also expects that more SORs will become validated as “RMAP-conformant” through the RMAP process and similar programs which will increase overall transparency and accessibility to information on geographic location of SOR mines of origin.

3M, working with its provider, will continue to expand its due diligence to further mitigate the risk that Necessary 3TG, cobalt, and other high-risk minerals that may benefit armed groups in the Covered Countries or by taking the following steps:

- Follow-up with those in the Supplier Group that were unresponsive or did not provide sufficient information in 2019, thereby improving both supplier response rates and the quality of supply chain information available to 3M.
  - Verify with those in the Supplier Group that indicated in their response to our 2019 inquiry that they did not have certain key aspects of a conflict minerals program, to educate and obtain updated information.
  - Continue our supplier engagement and capacity-building efforts through our supplier inquiry and outreach by directing suppliers to training resources available on the 3M Supplier Direct website ([https://www.3m.com/3M/en\\_US/suppliers-direct/](https://www.3m.com/3M/en_US/suppliers-direct/)) and through industry associations and RMI, in order to improve response rates and information quality.
  - Stay actively involved with and continue our company membership in RMI, which provides independent third-party audits of SORs due diligence practices including engagement in the RBA and RMI Annual Conference, Due Diligence Practices Team, Plenary Team and Smelter Engagement Team.
  - Encourage supplier and other company membership and participation in RMI, which will strengthen industry collaboration to increase leverage on SORs to participate in independent third-party audits and become conformant to RMAP, LBMA, or RJC protocols.
  - Contact SORs directly to undergo an audit of their due diligence practices with the goal of becoming compliant to the RMAP, LBMA, or RJC protocols.
  - Expect responsible sourcing by suppliers of 3TG in the Covered Countries through use of SORs validated as conformant to RMAP process.
  - Continue our Responsible Minerals program and process to support compliance to the European Union regulation on supply chain due diligence by importers of minerals and metals originating in conflict-affected and high-risk areas.
  - Retain our partnership with a provider to streamline supplier outreach, feedback and due diligence efforts.
  - Expand our responsible minerals assessment and due diligence efforts to include other high-risk minerals and areas of the world as determined by regulatory bodies and applied by RMI. In 2019 3M included cobalt in our outreach.
  - Accelerate escalation of identified “red-flagged” SORs/SORs that are not RMAP conformant and consistent with OECD Guidance to mitigate supply chain risk. As of April 27, 2020, 3M is continuing its due diligence efforts to mitigate supply chain risk with the remaining 6 suppliers that have reported to 3M that one or more of these SORs are in their respective supply chains.
  - Continue to evaluate upstream sources through a broader set of tools to evaluate risk. These include:
    - Using a comprehensive SOR library with detailed status and notes for each listing.
    - Scanning for credible media on each SOR to flag risk issues.
    - Comparing the list of SORs against government watch and denied parties lists.
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**Cautionary Statement about Forward-Looking Statements**

Certain statements in this report may be “forward-looking” within the meaning of the Private Securities Litigation Reform Act of 1995. Words such as “expects,” “intends,” “plans,” “projects,” “believes,” and “estimates,” “targets,” “anticipates,” and similar expressions are used to identify these forward-looking statements. Examples of forward-looking statements include statements relating to our future plans, and any other statement that does not directly relate to any historical or current fact. Forward-looking statements are based on our current expectations and assumptions, which may not prove to be accurate. These statements are not guarantees and are subject to risks, uncertainties and changes in circumstances that are difficult to predict. Actual outcomes and results may differ materially from these forward-looking statements. As a result, these statements speak only as of the date they are made and we undertake no obligation to update or revise any forward- looking statement, except as required by federal securities laws.

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## ANNEX I

As of April 27, 2020

The below list of SORs identified to 3M by the 3M Supplier Group is conformant with RMAP protocols as of April 27, 2020. 3M is typically many tiers in the supply chain removed from SORs, and our direct suppliers have not traced materials supplied to 3M back to individual SORs. Many of our suppliers provided information to 3M on all SORs identified to them by their suppliers, and have not been able to confirm that Necessary 3TG processed by these SORs is contained in the products they have supplied to us because some of the suppliers did not provide their CMRT at the product level. Therefore, it is possible that the list contains SORs not used to process Necessary 3TG contained in our products.

Metal	Standard Smelter	Smelter Facility	Smelter ID
Gold	8853 S.p.A.	ITALY	CID002763
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA	CID000015
Gold	Aida Chemical Industries Co., Ltd.	JAPAN	CID000019
Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES	CID002560
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY	CID000035
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	CID000041
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL	CID000058
Gold	Argor-Heraeus S.A.	SWITZERLAND	CID000077
Gold	Asahi Pretec Corp.	JAPAN	CID000082
Gold	Asahi Refining Canada Ltd.	CANADA	CID000924
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA	CID000920
Gold	Asaka Riken Co., Ltd.	JAPAN	CID000090
Gold	AU Traders and Refiners	SOUTH AFRICA	CID002850
Gold	Aurubis AG	GERMANY	CID000113
Gold	Bangalore Refinery	INDIA	CID002863
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	CID000128
Gold	Boliden AB	SWEDEN	CID000157
Gold	C. Hafner GmbH + Co. KG	GERMANY	CID000176
Gold	CCR Refinery - Glencore Canada Corporation	CANADA	CID000185
Gold	Cendres + Metaux S.A.	SWITZERLAND	CID000189
Gold	Chimet S.p.A.	ITALY	CID000233
Gold	Chugai Mining	JAPAN	CID000264
Gold	DODUCO Contacts and Refining GmbH	GERMANY	CID000362
Gold	Dowa	JAPAN	CID000401
Gold	DS PRETECH Co., Ltd.	KOREA, REPUBLIC OF	CID003195
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF	CID000359
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN	CID000425
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN	CID003424
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN	CID003425
Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES	CID002561
Gold	Geib Refining Corporation	UNITED STATES OF AMERICA	CID002459
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA	CID002243
Gold	Heimerle + Meule GmbH	GERMANY	CID000694
Gold	Heraeus Metals Hong Kong Ltd.	CHINA	CID000707
Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY	CID000711
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA	CID000801
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN	CID000807
Gold	Istanbul Gold Refinery	TURKEY	CID000814
Gold	Italpreziosi	ITALY	CID002765
Gold	Japan Mint	JAPAN	CID000823
Gold	Jiangxi Copper Co., Ltd.	CHINA	CID000855
Gold	JSC Uralelectromed	RUSSIAN FEDERATION	CID000929
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN	CID000937
Gold	Kazzinc	KAZAKHSTAN	CID000957
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA	CID000969
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND	CID002511
Gold	Kojima Chemicals Co., Ltd.	JAPAN	CID000981
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF	CID002605
Gold	Kyrgyzaltyn JSC	KYRGYZSTAN	CID001029
Gold	L'Orfebre S.A.	ANDORRA	CID002762
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF	CID001078
Gold	LT Metal Ltd.	KOREA, REPUBLIC OF	CID000689
Gold	Marsam Metals	BRAZIL	CID002606
Gold	Materion	UNITED STATES OF AMERICA	CID001113
Gold	Matsuda Sangyo Co., Ltd.	JAPAN	CID001119
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA	CID001149
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	CID001152
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA	CID001147
Gold	Metalor Technologies S.A.	SWITZERLAND	CID001153
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA	CID001157
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO	CID001161
Gold	Mitsubishi Materials Corporation	JAPAN	CID001188
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID001193
Gold	MBTC-PAMP India Pvt., Ltd.	INDIA	CID002509
Gold	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION	CID001204
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY	CID001220

Gold	Nihon Material Co., Ltd.	JAPAN	CID001259
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA	CID002779
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN	CID001325
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION	CID001326
Gold	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION	CID000493
Gold	PAMP S.A.	SWITZERLAND	CID001352
Gold	Planta Recuperadora de Metales SpA	CHILE	CID002919
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION	CID001386
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA	CID001397
Gold	PX Precinox S.A.	SWITZERLAND	CID001498
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA	CID001512
Gold	REMONDIS PMR B.V.	NETHERLANDS	CID002582
Gold	Royal Canadian Mint	CANADA	CID001534
Gold	SAAMP	FRANCE	CID002761
Gold	Safimet S.p.A	ITALY	CID002973
Gold	Samduck Precious Metals	KOREA, REPUBLIC OF	CID001555
Gold	SAXONIA Edelmetalle GmbH	GERMANY	CID002777
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN	CID001585
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA	CID001622
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA	CID001736
Gold	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHINA	CID002516
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION	CID001756
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA	CID001761
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN	CID001798
Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF	CID002918
Gold	T.C.A S.p.A	ITALY	CID002580
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN	CID001875
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA	CID001916
Gold	Tokuriki Honten Co., Ltd.	JAPAN	CID001938
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN	CID002615
Gold	Torecom	KOREA, REPUBLIC OF	CID001955
Gold	Umicore Brasil Ltda.	BRAZIL	CID001977
Gold	Umicore Precious Metals Thailand	THAILAND	CID002314
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM	CID001980
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA	CID001993
Gold	Valcambi S.A.	SWITZERLAND	CID002003
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA	CID002030
Gold	WIELAND Edelmetalle GmbH	GERMANY	CID002778
Gold	Yamakin Co., Ltd.	JAPAN	CID002100
Gold	Yokohama Metal Co., Ltd.	JAPAN	CID002129
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	CID002224
Tantalum	Asaka Riken Co., Ltd.	JAPAN	CID000092
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA	CID000211
Tantalum	CP Metals Inc.	UNITED STATES OF AMERICA	CID003402
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA	CID002504
Tantalum	Exotech Inc.	UNITED STATES OF AMERICA	CID000456
Tantalum	F&X Electro-Materials Ltd.	CHINA	CID000460
Tantalum	FIR Metals & Resource Ltd.	CHINA	CID002505
Tantalum	Global Advanced Metals Aizu	JAPAN	CID002558
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA	CID002557
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA	CID000616
Tantalum	H.C. Starck Co., Ltd.	THAILAND	CID002544
Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY	CID002547
Tantalum	H.C. Starck Inc.	UNITED STATES OF AMERICA	CID002548
Tantalum	H.C. Starck Ltd.	JAPAN	CID002549
Tantalum	H.C. Starck Smelting GmbH & Co. KG	GERMANY	CID002550
Tantalum	H.C. Starck Tantalum and Niobium GmbH	GERMANY	CID002545
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	CID002492
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA	CID002512
Tantalum	Jiangxi Tuohong New Raw Material	CHINA	CID002842
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	CID000914
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA	CID000917
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA	CID002506
Tantalum	KEMET Blue Metals	MEXICO	CID002539
Tantalum	LSM Brasil S.A.	BRAZIL	CID001076
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA	CID001163
Tantalum	Mineracao Taboca S.A.	BRAZIL	CID001175
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID001192
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	CID001277
Tantalum	NPM Silmet AS	ESTONIA	CID001200
Tantalum	PRG Doael	NORTH MACEDONIA, REPUBLIC OF	CID002847
Tantalum	QuantumClean	UNITED STATES OF AMERICA	CID001508
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL	CID002707
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION	CID001769
Tantalum	Taki Chemical Co., Ltd.	JAPAN	CID001869
Tantalum	Telex Metals	UNITED STATES OF AMERICA	CID001891
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN	CID001969
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA	CID002508
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	CID001522
Tin	Alpha	UNITED STATES OF AMERICA	CID000292
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA	CID000228
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA	CID003190



Tin	China Tin Group Co., Ltd.	CHINA	CID001070
Tin	Dowa	JAPAN	CID000402
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)	CID000438

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Tin	Fenix Metals	POLAND	CID000468
Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA	CID000942
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA	CID000538
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA	CID001908
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA	CID000555
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA	CID003116
Tin	Guanyang Guida Nonferrous Metal Smelting Plant	CHINA	CID002849
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA	CID002844
Tin	Huichang Jinshunda Tin Co., Ltd.	CHINA	CID000760
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA	CID001231
Tin	Ma'anshan Weitai Tin Co., Ltd.	CHINA	CID003379
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL	CID002468
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA	CID001105
Tin	Melt Metais e Ligas S.A.	BRAZIL	CID002500
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA	CID001142
Tin	Metallo Belgium N.V.	BELGIUM	CID002773
Tin	Metallo Spain S.L.U.	SPAIN	CID002774
Tin	Mineracao Taboca S.A.	BRAZIL	CID001173
Tin	Minsur	PERU	CID001182
Tin	Mitsubishi Materials Corporation	JAPAN	CID001191
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	CID001314
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES	CID002517
Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)	CID001337
Tin	PT Artha Cipta Langgeng	INDONESIA	CID001399
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA	CID002503
Tin	PT Menara Cipta Mulia	INDONESIA	CID002835
Tin	PT Mitra Stania Prima	INDONESIA	CID001453
Tin	PT Refined Bangka Tin	INDONESIA	CID001460
Tin	PT Timah Tbk Kundur	INDONESIA	CID001477
Tin	PT Timah Tbk Mentok	INDONESIA	CID001482
Tin	Resind Industria e Comercio Ltda.	BRAZIL	CID002706
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA	CID001539
Tin	Soft Metais Ltda.	BRAZIL	CID001758
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	VIET NAM	CID002834
Tin	Thaisarco	THAILAND	CID001898
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA	CID003325
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL	CID002036
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	CID002158
Tin	Yunnan Tin Company Limited	CHINA	CID002180
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA	CID003397
Tungsten	A.L.M.T. Corp.	JAPAN	CID000004
Tungsten	ACL Metais Eireli	BRAZIL	CID002833
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM	CID002502
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA	CID002513
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	CID000258
Tungsten	Fujian Ganmin RareMetal Co., Ltd.	CHINA	CID003401
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA	CID000499
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA	CID002645
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA	CID000875
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA	CID002315
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA	CID002494
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA	CID000568
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA	CID000218
Tungsten	H.C. Starck Smelting GmbH & Co. KG	GERMANY	CID002542
Tungsten	H.C. Starck Tungsten GmbH	GERMANY	CID002541
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA	CID000766
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA	CID002579
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA	CID000769
Tungsten	Hunan Litian Tungsten Industry Co., Ltd.	CHINA	CID003182
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION	CID002649
Tungsten	Japan New Metals Co., Ltd.	JAPAN	CID000825
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA	CID002551
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA	CID002321
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA	CID002318
Tungsten	Jiangxi Xincheng Tungsten Industry Co., Ltd.	CHINA	CID002317
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	CID002316
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA	CID000966
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA	CID000105
Tungsten	KGETS Co., Ltd.	KOREA, REPUBLIC OF	CID003388
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA	CID003407
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA	CID002319
Tungsten	Masan Tungsten Chemical LLC (MTC)	VIET NAM	CID002543
Tungsten	Moliren Ltd.	RUSSIAN FEDERATION	CID002845
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA	CID002589
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES	CID002827
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM	CID001889
Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION	CID002724
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA	CID002044
Tungsten	Woltech Korea Co., Ltd.	KOREA, REPUBLIC OF	CID002843
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA	CID002320
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA	CID002082
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA	CID002830



ANNEX II

As of April 27, 2020

The below list of 3TG countries of origin identified to 3M by the 3M Supplier Group is conformant with RMAP protocols as of April 27, 2020. 3M is typically many tiers in the supply chain removed from SORs, and our direct suppliers have not traced materials supplied to 3M back to individual countries of origin. Many of our suppliers provided information to 3M on all SORs identified to them by their suppliers, and have not been able to confirm that the countries of origin for all 3TG processed by these SORs have been used in the products they have supplied to us because they did not provide their CMRT at the product level. Therefore, it is possible that the list contains countries of origin of 3TG not contained in our products.

3M validated that SORs identified as sourcing from the Covered Countries are conformant to RMAP.

Afghanistan, Albania, Angola\*, Argentina, Armenia, Australia, Austria, Belarus, Belgium, Bermuda, Bolivia, Brazil, Bulgaria, Burundi\*, Cambodia, Canada, Central African Republic\*, Chile, China, Colombia, Czech Republic, Djibouti, Dominican Republic, DRC or an adjoining country (Covered Countries)\*, Ecuador, Egypt, England, Estonia, Ethiopia, Finland, France, Germany, Ghana, Guinea, Guyana, Hungary, India, Indonesia, Ireland, Israel, Italy, Ivory Coast, Japan, Kazakhstan, Kenya, Kyrgyzstan, Laos, Liberia, Lithuania, Luxembourg, Madagascar, Malaysia, Mali, Mauritania, Mexico, Mongolia, Morocco, Mozambique, Myanmar, Namibia, Netherlands, New Zealand, Niger, Nigeria, Papua New Guinea, Peru, Philippines, Poland, Portugal, Republic\*, Republic Of Korea, Russia, Rwanda\*, Saudi Arabia, Sierra Leone, Singapore, Slovakia, Slovenia, South Africa, Spain, Sudan\*, Suri, Suriname, Sweden, Switzerland, Tanzania\*, Thailand, Turkey, Uganda\*, United Arab Emirates, United Kingdom, USA, Uzbekistan, Viet Nam, Zambia\*, Zimbabwe

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\* Covered Country

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