

# Solventum

# Supplier Responsibility Code

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# Introduction

We are committed to building a healthier and more sustainable future for all. Our employees demonstrate that commitment every day in our own operations and in the communities in which we live and work. We recognize the choices we make for our material and service providers must also reflect these values. We want our suppliers to share our commitment to maintaining compliant, responsible and sustainable operations and practices.

**The Solventum Supplier Responsibility Code outlines Solventum’s basic expectations for our suppliers in the areas of Management Systems, Labor, Health and Safety, Environment and Ethics. This Code is based on our corporate values for sustainable and responsible operations, and also aligns with the [10 Principles of the United Nations Global Compact](#) and with the Responsible Business Alliance (RBA)**

Fundamental to conforming to this Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules and regulations of the locations in which it operates. Suppliers must maintain compliance systems and be able to demonstrate a satisfactory record of compliance with laws and regulations in conducting their business. Solventum also encourages suppliers to go beyond legal compliance, drawing upon internationally recognized standards to advance social and environmental responsibility and business ethics. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with applicable regulations.

Conformance to this Code is required to become or remain a supplier to Solventum, anywhere in the world, and for any supplied material or service. Our suppliers are also expected to hold their subcontractors and suppliers accountable to the principles in this Code. It is the supplier’s responsibility to disseminate and educate the requirements of this Code to their employees, agents, subcontractors, and suppliers. We expect our suppliers to communicate their conformance status to us when requested and to make any necessary improvements to ensure full conformance. Suppliers shall support Solventum or its designated 3<sup>rd</sup> party provider’s monitoring of performance against this Code as deemed necessary, including requesting specific performance information. We encourage and expect our suppliers to periodically assess themselves and their suppliers for conformance.

If non-conformance to this Code is detected, Solventum will attempt to work with the supplier concerned to correct the situation. We expect the supplier to develop a corrective action plan to bring its operations into Code conformance so that supply to Solventum can continue. If a supplier does not develop such a plan or fails to implement it, Solventum may move to terminate the business relationship.

If, however, a supplier demonstrates not only conformance to this Code, but additional dedication to improving the sustainability of their operations, they may positively distinguish

themselves from their competition. We encourage all suppliers to take a proactive approach to responsible and sustainable operations by establishing and implementing their own relevant policies and programs and expecting their suppliers to do the same. In addition, Solventum is committed to the continuous improvement of all areas of the Supplier Responsibility Code and expects its suppliers to have the same level of commitment within their own programs.

## A. LABOR

In addition to full compliance with all applicable labor and human resource laws, we expect our suppliers to be committed to upholding the human rights of workers and treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

Our supplier labor standards are:

### **1) Freely Chosen Employment**

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, trafficked or slave labor is not permitted. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility, nor any unreasonable restrictions on entering or exiting company-provided facilities, including, if applicable, workers' dormitories or living quarters. As part of the hiring process for workers entering the country specifically to work for the supplier, foreign migrant workers must be provided with a written employment agreement in their native language that describes terms and conditions of employment prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement after departure from the country of origin unless these changes are made to meet local law and provide equal or better terms as agreed upon by both parties. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per the worker's contract, if applicable. Employers, as well as their agents and sub-agents, may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law. In this case, at no time should workers be denied reasonable access to their documents. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by a worker, such fees shall be repaid to the worker.

## **2) Young Workers**

Suppliers must comply with the applicable local laws on the minimum hiring age for employees; provided, however, that in no case may a supplier hire or use the services of a worker younger than 15 years of age. Suppliers shall implement an appropriate mechanism to verify the age of workers. Workers younger than 18 years of age (“Young Workers”) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable laws and regulations. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be similar to other entry-level workers performing equal or similar tasks.

## **3) Working Hours**

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed legally mandated breaks, holiday, and vacation days to which they are legally entitled, including time off when ill or for family and medical leave. Further, workers shall be allowed at least one day off every seven days.

## **4) Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage and hour laws, including those relating to minimum wages, overtime hours and legally mandated benefits. If required by local laws, suppliers shall compensate workers for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted, unless due to serious violation(s) resulting in a suspension and in compliance with applicable law. For each pay period, suppliers shall provide workers with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law. Suppliers must also comply with applicable law concerning pay equity and should seek to ensure that employees of different genders are paid the same for similar job responsibilities.

## **5) Humane Treatment**

There is to be no harsh or inhumane treatment including any violence, gender-based violence, sexual or other harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

### **6) Non-Discrimination / Non-Harassment**

Suppliers should commit to a workplace free of harassment and unlawful discrimination. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, marital or family status, or with respect to any other characteristic protected by applicable law, in hiring and employment practices such as wages, promotions, rewards, access to training, reduction in workforce or terminations. Suppliers shall reasonably accommodate workers for religious practices. In addition, suppliers should not subject workers or potential workers to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. Physical assessments to determine capability to perform the job are appropriate if based on physical job requirements.

### **7) Freedom of Association**

In conformance with local law, suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be permitted to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

## **B. HEALTH AND SAFETY**

In addition to full compliance with all applicable health and safety laws, we expect our suppliers to minimize the incidence of accidental work-related injury, death and illness, and foster a safe and healthy work environment. Suppliers should utilize ongoing worker input and education as essential opportunities to identify and mitigate health and safety issues in the workplace.

Our supplier health and safety standards are:

### **1) Occupational Safety**

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, excessive noise, fall hazards, etc.) are to be identified, assessed, and mitigated using the Hierarchy of Controls. This could include elimination, substitution of processes or materials controlled through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures (including lockout/tagout), and ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided, free of charge, with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards.

Supplier's workplace shall have appropriate lighting and temperatures. Reasonable steps must also be taken to work with pregnant women and nursing mothers in evaluating working conditions. Suppliers should move or reduce any workplace health and safety risks identified for pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodation as appropriate.

## **2) Emergency Preparedness**

Suppliers are to identify and assess potential emergency situations and events, and minimize their impact by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, including accessibility and maintenance of fire extinguishers, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property. Exit doors, stairwells and routes shall be clearly marked and kept clear of obstructions.

## **3) Occupational Injury and Illness**

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

## **4) Industrial Hygiene**

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards are identified, suppliers shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

## **5) Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

## **6) Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

### **7) Sanitation, Food, and Housing**

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities (canteen). Worker dormitories provided by the supplier or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

### **8) Health and Safety Communication**

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand, for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards language. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns without retaliation.

## **C. ENVIRONMENT**

Solventum and its suppliers recognizes that environmental responsibility is integral to producing world-class products. In addition to full compliance with all applicable environmental laws, suppliers shall integrate environmental responsibility into their operations. Suppliers shall identify environmental impacts and minimize adverse effects on the community, environment, and natural resources, while safeguarding the health and safety of workers and the public.

Our supplier environmental standards are:

### **1) Environmental Permits and Reporting**

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

### **2) Hazardous Substances**

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

### **3) Solid Waste**

Suppliers shall implement a systematic approach to identify, manage, reduce, recycle, and responsibly dispose of non-hazardous solid waste.



#### **4) Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled and treated, as required, prior to discharge. Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Suppliers shall conduct routine monitoring of the performance of its air emission control systems where appropriate.

#### **5) Materials Restrictions**

Suppliers are to adhere to all applicable laws, regulations, and Solventum requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal. At Solventum's request, Suppliers are expected to provide to Solventum reports on the occurrence of substances in any materials supplied to Solventum that may be restricted by, or require disclosure to, governmental bodies, customers and/or recyclers.

#### **6) Water Management**

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge, and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance as appropriate.

#### **7) Energy Consumption and Greenhouse Gas Emissions**

Suppliers are to establish a corporate-wide greenhouse gas reduction goal, where applicable. Significant energy consumption and greenhouse gas emissions are to be tracked and documented at the facility and/or corporate level. Suppliers are to look for cost-effective methods to improve energy efficiency in their operations and to minimize their energy consumption and greenhouse gas emissions.

#### **8) Pollution Prevention and Resource Reduction**

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products etc., are to be conserved by practices supporting a circular economy. This may be accomplished by modification of production, maintenance, and facility processes and/or by reducing, substituting, reusing, increasing recyclability, recycled or renewable content of materials while sustaining product performance.

### **9) Transportation**

Suppliers are expected to comply with all applicable laws governing the transportation of goods and materials. If handling Hazardous Materials\* in the United States, suppliers are expected to be registered with the U.S. Department of Transportation as a Hazardous Materials shipper and are expected to be trained, tested and certified to package, mark, label and ship Hazardous Materials as required by law. If handling Dangerous Goods\* outside the United States, suppliers are expected to be trained in and shall comply with applicable transportation regulations for air, ocean, or land cargo.

\*Hazardous material/dangerous good means a substance or material that has been determined by a regulatory agency (i.e., U.S. Department of Transportation, International Maritime Dangerous Goods Code of the International Maritime Organization, etc.) to be an unreasonable risk to health, safety and property when transported in commerce and which has been so designated.

### **10) Legally Harvested Plant Materials**

Suppliers are expected to supply to Solventum materials containing plant materials or their derivatives that are legally sourced, harvested and exported from their country of origin. Suppliers are expected to adopt policies and management systems with respect to the U.S. Lacey Act, the EU Timber Regulation and similar laws and to require their suppliers to adopt similar policies and systems. Further, Solventum has a detailed Pulp and Paper Sourcing Policy with additional traceability, environmental and social expectations for suppliers of all types of paper and pulp materials.

### **11) Responsible Sourcing of Minerals (aka Conflict Minerals)**

Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold and other minerals of concern in the products manufactured to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

## D. ETHICS

In addition to full compliance with all applicable business ethics laws, to meet social responsibilities and to achieve success in the marketplace, our suppliers and their agents are to uphold the highest standards of ethics.

Our supplier ethics standards are:

### **1) Business Integrity**

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on supplier's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws. Suppliers should conduct appropriate risk-based diligence prior to engaging contractors or other third parties to ensure that such third parties comply with this Code and the anti-corruption laws.

### **2) Anti-corruption**

Supplier shall comply with all applicable anti-bribery laws while conducting business on behalf of Solventum. Supplier shall not engage in any form of bribery, kickbacks, corruption, extortion, money laundering or embezzlement. Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, direct the hiring of any person or otherwise gain an improper advantage.

### **3) Gifts and Entertainment**

Supplier must not provide any gift, meal or entertainment to a Solventum employee that might influence, or appear to influence, a Solventum employee's decision in relation to the supplier. Business decisions must be made on the basis of fair and objective criteria. Gifts, meals or entertainment may be offered to a Solventum employee if modest in value, infrequent, not in the form of cash or cash equivalents, hosted in locations that will not bring reputational harm, free from the appearance of improper influence, consistent with customary business practice, and such gift, meal or entertainment does not violate Supplier's internal policies or any laws.

### **4) Conflicts of Interest**

Supplier must not enter into any transaction with Solventum employees that could create an actual or perceived conflict of interest. A conflict of interest is any situation where an individual's interests or relationships could inappropriately influence, or appear to inappropriately influence, decisions an individual makes on Solventum's behalf. Even the perception of a conflict of interest between a Solventum employee and a supplier could be detrimental to Solventum's business interests and reputation.

### **5) Disclosure of Information**

All business dealings shall be transparently performed and accurately reflected on supplier's books and records. Supplier shall disclose information regarding labor, health and safety, environmental practices, business activities, structure, financial situation and performance consistent with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices is not acceptable.

### **6) Intellectual Property**

Supplier shall respect intellectual property rights, ensure technology and know-how is transferred in a manner that protects intellectual property rights and ensures customer and supplier information is safeguarded.

### **7) Fair Business, Advertising and Competition**

Standards of fair business, advertising and competition are to be upheld.

### **8) Reporting, Protection of Identity and Non-Retaliation**

Supplier shall have adequate programs to address employee concerns and grievances. Those programs must be communicated, protect confidentiality, allow anonymity of raising concerns or reporting unless prohibited by law, and protect employees against retaliation.

### **9) Privacy**

Supplier shall protect the personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

## **E. MANAGEMENT SYSTEM**

Suppliers are expected to adopt or establish a management system covering the elements of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the supplier's operations, products and services; (b) conformance with this Code; and (c) identification and mitigation of risks related to this Code. It should also be designed to facilitate continuous improvement with all aspects of the Code.

The management system should contain the following elements:

### **1) Company Commitment**

Corporate social and environmental responsibility policy statements affirming the supplier's commitment to compliance and continuous improvement, endorsed by executive management

and posted or otherwise made available in the supplier's facility (where applicable) in the local language.

## **2) Management Accountability and Responsibility**

The supplier clearly identifies senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis. Supplier shall have a process to assess that sufficient and qualified resources are assigned to their own Supplier Responsibility Code.

## **3) Legal and Customer Requirements**

A process to identify, monitor and understand applicable laws, regulations, and, customer requirements, including the requirements of this Code.

## **4) Risk Assessment and Risk Management**

A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

## **5) Improvement Objectives**

Written performance objectives, targets and implementation plans to improve the supplier's performance against this Code, including a periodic assessment of supplier's performance in achieving those objectives.

## **6) Training**

Programs for new and ongoing training of managers and workers to implement supplier's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements and this Code.

## **7) Communication**

A process for communicating clear and accurate information about supplier's policies, practices, expectations, and performance to workers, suppliers, and customers.

## **8) Worker Feedback, Participation and Grievance**

Ongoing effective processes, including an effective grievance mechanism, to assess employees'/workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code to aide with conformance and foster continuous improvement.

Employees/workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

**9) Audits and Assessments**

Periodic self-evaluations to ensure conformance to legal and regulatory requirements, and the content of this Code, including customer contractual requirements related to social, environmental, health and safety responsibility.

**10) Corrective Action Process**

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

**11) Documentation and Records**

Processes and controls to ensure accurate books and records, and creation and maintenance of documents and records to ensure regulatory compliance and conformance to company requirements, along with appropriate confidentiality to protect privacy.

**12) Supplier Responsibility**

A process to communicate the Solventum Supplier Responsibility Code requirements to next-tier suppliers and to require suppliers to adopt management systems and practices for conformance to this Code or requirements materially consistent with this Code.

Questions? Refer to the Supplier Resources page on [Solventum.com](http://Solventum.com).