

3M Healthcare Germany GmbH

Declaration of Principles and Principles on the German Supply Chain Due Diligence Act (LkSG)

Stand: April 2024

Summary:

3M spun-off its 3M Health Care business effective 1 April 2024, resulting in two world-class independent publicly traded companies whereby 3M's Health Care business became Solventum, a separate dedicated global diversified health care technology leader.

3M Healthcare Germany GmbH ("Solventum Germany") is engaged in the manufacture and trade of filtration products, pharmaceutical products, medical products and devices, as well as software for hospital billing systems; research, development, application technology, improvement of production methods and technical service in the above-mentioned fields.

At Solventum Germany we share our clients' commitment to ethical and legal business practices around the world. The 3M Group has been named the World's Most Ethical Company® by the Ethisphere Institute nine years in a row. This award also reflects the Solventum Group's ongoing commitment to adhering to the highest ethical values and compliance standards in our business practices. Since 2014, 3M has also been a participant in the United Nations Global Compact.

Solventum continues to invest in programs designed to help our employees understand and live our Code of Conduct. One of the core principles of Solventum's business conduct is compliance with applicable laws wherever Solventum does business worldwide.

Solventum Germany is also guided by Solventum's own Supplier Responsibility Code, which covers Solventum's expectations of all its suppliers in the areas of labor, health & safety, environment, ethics and management systems. Compliance with the Supplier Code is required in order to become and remain a supplier of Solventum's materials or services.

The following self-declaration and policy statement describes how Solventum Germany fulfils its duty of care compliance with regard to the German Supply Chain Due Diligence Act (LkSG).

Introduction

Acting responsibly, sustainably, ethically and lawfully is one of the central cultural elements and principles of Solventum and is firmly anchored in its corporate strategy and the Code of Conduct. This includes appropriate compliance with human rights and environmental due diligence obligations in accordance with the German Supply Chain Due Diligence Act. These elements and principles are also followed by Solventum as an independent company.

1. Ethical action as a basic principle

The success of Solventum is based on long-term trust – business partners, customers and suppliers have trusted our products for decades. Maintaining and expanding this trust is a fundamental principle of the company and one of Solventum's tenets is to require ethical business conduct at all times. This philosophy is anchored in the corporate culture of Solventum as well as in the Code of Conduct, which applies to over 20,000 employees in over 30 countries, and is based on mutual respect and trust. Solventum also ensures that by complying with the Solventum Supplier Responsibility Code, its suppliers share their commitment to compliant, responsible and sustainable operations and practices. We expect

our suppliers to enforce these expectations together with their own sub-suppliers, thus promoting our high sustainability standards across our supply chains.

3M's sustainability reporting, related policies and standards can be found at the following link:

<https://multimedia.3m.com/mws/media/2292786O/3m-2023-global-impact-report.pdf>

Solventum's sustainability reporting, related policies, standards, Code of Conduct and Supplier Responsibility Code can be found at the following links:

[Sustainability and social impact initiatives | Solventum](#)

[Ethics and compliance | Solventum](#)

[Partners and suppliers information | Solventum](#)

The following declaration in accordance with the Supply Chain Due Diligence Act (LkSG) refers to the German subsidiaries of Solventum, including Solventum Germany, and their supply chains. The declaration describes the human rights strategy with regard to the risks defined in the LkSG. This self-declaration and policy statement will be published on the Solventum website.

2. Obligations under the Supply Chain Due Diligence Act

This self-declaration and declaration of principles describes the compliance with subject-specific requirements for Solventum Germany under the LkSG. It does not constitute an obligation of Solventum Germany towards its customers or business partners or suppliers or employees that goes beyond the interface regulation and Solventum Germany assumes no further responsibility, liability, indemnification obligations or the like towards them. Additionally, this self-declaration is not a contract, in particular not a contract for the benefit of third parties, nor a contract with protective effect for the benefit of third parties. Until revoked, this self-declaration is also considered a declaration of principle pursuant to § 6 (2) LkSG;

The activities of Solventum Germany fall within the scope of the German LkSG, which prescribes a duty of care with regard to the following human rights and environmental risks.

M1 Prohibition of child labour

M2 Prohibition of Forced Labor and All Forms of Slavery

M3 Failure to comply with occupational safety and health and work-related health hazards

M4 Disregard for freedom of association - freedom of association and right to collective bargaining

M5 Prohibition of unequal treatment in the workplace

M6 Prohibition of withholding reasonable wages

M7 Destruction of the natural basis of life by pollution

M8 Unlawful infringement of land rights

M9 Prohibition of the recruitment or deployment of private/public security forces that could lead to impairment due to lack of instruction or control

M10 The prohibition of an act going beyond this or the omission of a breach of duty which is directly liable to affect a protected legal position (which results from the human rights conventions within the meaning of § 2(1)) and the illegality of which is obvious after a reasonable assessment of all relevant circumstances

U1 Prohibited production, use and/or disposal of mercury (Minamata Convention)

U2 Prohibited manufacture and/or use of substances within the scope of the Stockholm Convention (POPs) and unenvironmentally sound handling of waste containing POPs

U3 Prohibited import/export of hazardous waste within the meaning of the Basel Convention

3. Expectations

Solventum Germany expects its employees and its suppliers in the supply chain within the meaning of the LkSG to support our commitment to ethical business conduct and integrity in order to identify and appropriately protect (or prevent) the human rights and environmental risks and violations described in the LkSG and, if necessary, to protect (or prevent) them.

This applies in particular to the priority areas of human rights and environmental risks. It is expected that the employees of Solventum Germany and its suppliers in the supply chain support us in risk management, risk analysis, preventive and remedial measures as well as the complaint procedure within the meaning of the LkSG; this applies to the own business area of Solventum and its supply chains within the meaning of the LkSG are expressed in this regard, for example, in the Solventum Code of Conduct and the Solventum Supplier Responsibility Code.

4. Procedure

Solventum Germany has a proven management system. This consists of specifications for the management of the organizational units, regulatory management, risk management, an internal control system and a compliance management system. In addition, appropriate instructions are available.

The requirements of the LkSG, in particular risk management, are interwoven in terms of personnel, processes and documentation. Annual and event-related risk analyses are carried out in the company's own business area and in the supply chain in accordance with the instructions and regulations of the LkSG.

The results are weighted and prioritized appropriately. Prevention and remediation measures in accordance with the LkSG are assigned to the prioritised risks. Their effectiveness is reviewed annually and as necessary and updated if necessary. In accordance with the legal requirements, Solventum Germany also includes indirect suppliers in the aforementioned analyses and measures. This applies in particular if Solventum has factual indications that a violation of a human rights or environmental obligation by an indirect supplier appears possible. Solventum Group maintains a legally compliant, worldwide complaints procedure.

Solventum Germany will check, update and, if necessary, document and report the fulfilment of the duty of care in accordance with the law. Solventum Germany business premises adhere to the obligations arising from the LkSG with regard to the risks listed in the LkSG.

4.1. Risk analysis according to LkSG

Solventum Germany carries out a risk analysis according to LkSG. Customers and contractors are informed on a need-to-know basis in accordance with the our interface rules (see below).

4.2. Priority Risks

Solventum Germany carries out the risk analysis continuously and ad hoc in accordance with the legal requirements, in particular with regard to appropriate weighting and prioritization. This statement will be reviewed and updated accordingly.

4.3. Prevention and remedial measures according to LkSG

Solventum Germany has prevention and remediation measures in accordance with LkSG. These are applied in particular in our own business areas and in relation to our direct suppliers.

4.4 Treatment of indirect suppliers according to LkSG

Solventum Germany treats indirect suppliers in accordance with LkSG. Customers and contractors will be informed on a need-to-know basis in accordance with the our interface rules (see below) (see also 4.1)

4.5. Complaints procedure according to LKSG

Solventum Group has a worldwide complaint procedure in accordance with LkSG.

4.6. Interface Rules

Solventum Germany will comply with the human rights and environmental expectations required by the LkSG and take appropriate account of them in its supply chain. Solventum Germany will also support its customers in risk management, risk analysis, prevention, remediation and complaint procedures within its own business area and vis-à-vis its direct and indirect suppliers to the extent necessary (in particular to the legally prescribed extent of reasonableness and effort targets).

Solventum Germany will answer the legitimate questions of the customer in the best possible way; trade secrets are protected and are not to be disclosed. Solventum Germany determines at its own discretion what constitutes a trade secret (this applies in particular to intellectual property, know-how, designs, processes and methods, recipes, contents, materials, calculation components, countries of origin, regions, suppliers, customers, names, addresses, telephone numbers). Solventum Germany informs its customers about its own business area and the supply chain of Solventum Germany according to the need-to-know principle, taking into account appropriateness and legal obligation. In justified cases, the customer is given the opportunity to audit, whereby the subject, intensity, duration and frequency must be coordinated with Solventum Germany Accordingly, Solventum Germany can only allow such audits in justified cases and in principle only vis-à-vis third parties who are obliged to neutrality and confidentiality. Solventum Germany decides at its own discretion which certifications it seeks, maintains and awards.

4.7. Reporting

Solventum will continuously document the fulfilment of the aforementioned obligations, in particular the duty of care according to the LkSG, and report on it in accordance with the LkSG.