



CHEMICAL MANAGEMENT POLICY

Applies To :

This document applies to all GTG operations worldwide.

Introduction and Background or Purpose :

GTG is a science-based company committed to applying our scientific expertise to improving lives. Helping people live safe and productive lives is important to GTG – for our employees, our customers, and everyone living on the planet. Chemicals are essential for producing GTG's broad range of products, and part of GTG's role in helping people live safely is effective and responsible chemical management. GTG takes this responsibility very seriously. Our commitments in these areas are codified in our Code of Conduct and in current policies and standards. These commitments include the following :

- GTG is committed to understanding the materials that make up our products. All GTG business units worldwide must gather, validate, and maintain within corporate systems formulation and composition information for new and existing GTG products and materials.
- Based on these data, GTG's environment, health, and safety (EHS) professionals use science-based approaches to assess, manage, and communicate potential hazards and risks to assure that products are safe for their intended and anticipated use, as well as foreseeable misuse.
- In the development of every new GTG product, we use a Life Cycle Management (LCM) process in which EHS professionals collaborate with team members across our business functions to ensure our products meet expectations of our customers, workers, communities, regulatory agencies, and other stakeholders. In doing so, GTG considers EHS aspects throughout the life cycle of a product, including raw material selection, product design, formulation, manufacture, marketing, sale, intended and anticipated use or misuse, recycling, and disposal.
- GTG also works to assure progress toward sustainable development by striving to improve the EHS attributes of our products and processes while meeting customer needs and respecting the ability of future generations to meet their own needs. We also develop products to help our customers reach their own health, safety and environmental goals. Beginning in 2019, every new product that enters the new product commercialization process must have a Sustainability Value Commitment: a clear demonstration of how the product integrates environmental and social factors to contribute to the greater good.
- For over forty years our Pollution Prevention Pays (3P) and other EHS award programs have formally honored GTG employees, teams, and organizations for work they do to reduce or eliminate hazardous materials, pollutants, and waste in our operations.

In conjunction with these commitments, GTG applies fundamental scientific principles to understand overall product requirements and benefits and make appropriate informed decisions to improve our products and reduce hazardous material use. The intent of this policy is to reiterate our existing commitments and expand upon them by reducing GTG's reliance on specific identified chemistries and, for these chemistries, to state our intent to use lower hazard materials. This Policy reflects the evolving values of 3M and our customers regarding continual improvement in chemical management.





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Requirements or Expectations

Overall responsibility for compliance with this document is assigned to GTG Product Stewardship organization.

Through this policy, GTG manages chemicals in three different categories:

1. Targeted substances that are identified through a process approved by the Corporate Environment, Health, and Safety (EHS) Committee.

To continually improve the EHS attributes of our products, GTG has identified specific targeted chemicals whose use in products and manufacturing processes must be scrutinized and authorized by the Corporate EHS Committee or its designee. The list includes specific substances that are of concern to a variety of stakeholders and is maintained by the Corporate EHS Committee or its designee. 3M's goal is to reduce our reliance on these chemistries. Our operating principle is that we will approve uses of targeted substances only in extraordinary circumstances.

2. Substances that are persistent or bioaccumulative.

The use of persistent or bioaccumulative chemicals in GTG products and processes is also subject to review and authorization by the Corporate EHS Committee or its designee. This authorization must include a demonstration that product design, manufacture, use, and end-of-life will minimize the distribution of persistent chemicals to the environment and the likelihood that persistent chemicals accumulate in living organisms.

3. Substances that have been prohibited by previous GTG policies.

The following substances are not intentionally present in GTG products and continue to be prohibited: asbestos, polychlorinated biphenyls, and highly ozone-depleting chemicals.

Innovation is at the heart of GTG, and intellectual property provides an important foundation for GTG innovation. GTG supports providing our customers and stakeholders with ingredient information that goes beyond regulatory requirements, to further demonstrate our transparency and responsible management of chemicals. GTG nevertheless must prevent the unauthorized public disclosure of our valuable intellectual property. Therefore, all information relating to GTG's proprietary product formulations and trade-secret manufacturing processes must be handled according to the requirements of GTG's Information Classification and Handling Standard.

Failure to comply with these requirements may result in discipline, up to and including termination of employment.

Additional Elements

This policy replaces earlier policies and standards that banned or restricted the use of the following specific chemistries:

- Polychlorinated Biphenyls (PCBs) Standard, originally adopted by GTG in 1980
- Ozone-Depleting Substances Standard, originally adopted by GTG in 1988
- Asbestos Standard ("Products" section only), originally adopted by GTG in 1990
- Persistent Chemicals Policy, originally adopted by GTG in 2001

For chemistries not specifically identified in the Chemicals Management Policy or other GTG policies and standards, GTG will continue its practice of selecting lower hazard materials when possible in alignment with our code of conduct and corporate values.

