

2025 Modern Slavery Statement

Modern Slavery Statement overview

This statement describes Solventum Corporation's and its subsidiaries' ("Solventum" or the "Company") actions regarding modern slavery and human trafficking in our business and supply chains for calendar year 2024 (April 1 – December 31). Solventum, a newly independent healthcare company, spun off from 3M on April 1, 2024. This statement is published in accordance with the provisions of the United Kingdom (UK) Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Cth), the California Transparency in Supply Chain Acts, the Norway Transparency Act, the German Supply Chain Due Diligence Act (LkSG), the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Canadian Act"), the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour, and the French Corporate Duty of Vigilance Law (Law n°2017-399, 27 mars 2017). Subsidiaries subject to these laws include:

- Solventum Germany GmbH (Germany);
- KCI Medical Limited (UK);
- KCI Medical AS (Norway);
- 3M Healthcare Canada Company Limited;
- KCI Medical Canada Inc./Fournitures Medicales KCI du Canada Inc.; and
- KCI Medical Australia Pty Ltd.
- KCI Medical GmbH (Switzerland)

This statement was produced in consultation with our subsidiaries to identify and assess modern slavery risks that may exist. The following corporate functions periodically meet and discuss the actions described in this statement:

- Ethics & Compliance;
- Human Resources, and;
- Global Procurement.

This Statement for Solventum, for the entities listed above, was approved on 23 May 2025 by the members of the Executive Team of Solventum whose signatures are set forth below, in Solventum's capacity as the principal governing body for 2024.

We have authority to bind the Solventum entities listed above. In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for the entities listed above. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in the report is true, accurate, and complete in all material respects, to the best of our knowledge, information and belief for the purposes of the Canadian Act, for the reporting year listed above.



Marcela Kirberger

Chief Legal Affairs Officer

Member of Solventum's Executive Team



Paul Harrington

Chief Supply Chain Officer

Member of Solventum's Executive Team

Solventum business structure, operations and supply chain

Solventum is a new healthcare company with a long legacy of creating breakthrough solutions for our customers' toughest challenges. We pioneer game-changing innovations at the intersection of health, material and data science that change patients' lives for the better — while empowering healthcare professionals to perform at their best. Solventum spun off from 3M Company ("3M") on April 1, 2024. At the end of calendar year 2024, Solventum had approximately 22,000 employees.

As published in our Annual Report on Form 10-K, published on February 28th, 2025, Solventum is a global organization with major centers throughout the world, including the license of Solventum's U.S. principal office located at 3M Center in Maplewood, Minnesota from 3M. Additionally, the Company owns, leases or otherwise has rights to use a number of facilities, including administration, research and development, manufacturing, warehousing, distribution and other facilities across the United States and globally. Solventum owns, leases or otherwise has rights to use approximately 277 facilities consisting of approximately 22 facilities owned and approximately 255 facilities that are leased or otherwise have rights to use. The Company has 10 manufacturing facilities in the United States and 18 outside of the United States, including Canada, China, France, Germany, Ireland, Mexico and Poland. Many of these facilities serve more than one of our business segments and multiple functions across our business.

Read about our business and its segments on page 5 of our [2024 Annual Report on Form 10-K](#).

Our global supply chain encompasses nearly 15,000 suppliers in more than 260 subcategories and 70 countries and plays a key role in our ability to solve customer needs and move healthcare forward.

Policies and standards

We strive to ensure supplier quality and performance through the application of stringent policies and assessments. Our supply chain expectations, covering labor, health and safety, environment, ethics and other areas, are communicated through the following core policies.

Our [Code of Conduct](#) details our ethical standards and serves as our framework to guide us in our business practices. We promote safe and healthy human rights work practices and prohibit forced labor, child labor, slavery, and human trafficking. The Code of Conduct applies to all Solventum employees, and we expect our suppliers to share this commitment to compliance, responsibility and sustainability. Solventum's Code of Conduct is owned by the Solventum Ethics and Compliance team and went into effect on April 1, 2024.

Our [Human Rights Policy](#) outlines our commitment to internationally recognized human, labour and workplace rights. The Human Rights policy is owned by the Human Resources team and was effective on April 1, 2024.

Our [Supplier Responsibility Code](#) communicates our expectations in the areas of labor, health and safety, environment, ethics and management systems. Topics covered include business integrity, anti-corruption, conflicts of interest, non-discrimination and non-harassment, and freely chosen employment. The code is based on our corporate values for sustainable and responsible operations and aligns with the Ten Principles of the United Nations Global Compact. The Supplier Responsibility Code is owned by Global Procurement and was effective on April 1, 2024.

As outlined in our supplier contracts and purchase order terms and conditions, which pertain to Solventum tier 1 suppliers, we require full compliance with our Supplier Responsibility Code, as well as adherence to all applicable laws and regulatory requirements.

This code explicitly prohibits forced labour, bonded labour, human trafficking, and child labour, and requires fair wages, working hours and safe conditions. Our tier 1 suppliers are expected to cascade these standards to their own supply chain and hold their vendors, contractors, subcontractors and agents accountable to comply with all applicable laws, rules and regulations. Solventum or our designated third-party providers reserve the right to evaluate, audit and inspect suppliers' facilities, operations and records at any time to confirm compliance. We encourage and expect our suppliers to periodically assess themselves and their suppliers for conformance.

Due diligence management system and risk assessment

In our operations:

Solventum is committed to upholding human and workplace rights in all Solventum operations globally. Solventum's Human Rights Policy outlines our expectations and underscores basic tenets of respect for the dignity and worth of all individuals and the provision of equal opportunity.

Within Solventum, our approach to managing and protecting human rights, including protection against modern slavery, is guided by our Code of Conduct. Our ethics program prioritizes honesty and fairness in our operations. All employees worldwide are expected to act with high ethical standards and follow our Code of Conduct and internal policies, as well as applicable government regulations where we operate.

Our Code of Conduct outlines our commitment to high ethical standards, legal compliance and the stewardship of Solventum's values. The code — available in 17 languages — serves as the ethical bedrock of our organization, creating an inclusive workplace and guiding how we do business. It covers a range of topics, from respectful work environment, to human rights, to conflicts of interest.

Solventum encourages all employees to ask questions, raise concerns and report all suspected violations of law or our Code of Conduct. We provide feedback channels that allow employees to share experiences, express needs and offer insights, and we have established multiple avenues to report misconduct. Anonymous reporting is available where permitted by law. To report a concern, employees can contact:

- Managers or supervisors;
- Human Resources;
- Solventum Legal Affairs Team;
- Solventum Ethics & Compliance;
- Solventum Corporate Audit Department; or
- [SolventumEthics.com](https://www.solventumethics.com).

Leaders play a pivotal role by setting a positive example, fostering an open environment for questions and concerns, and addressing issues appropriately. In addition, members of our Ethics & Compliance Department work across our organization to raise awareness about our Code of Conduct and ethics and compliance policies, standards and procedures.

Solventum takes all reported concerns about business conduct seriously. A team of experienced investigators reviews concerns thoroughly and conducts an investigation when necessary. Solventum maintains the confidentiality of all reported concerns in accordance with legal requirements and in the best interest of the organization and those involved. Solventum does not tolerate retaliation for anyone who raises a genuine concern and educates employees on our non-retaliation stance, which is part of our Code of Conduct.

Violations of our Code of Conduct or any related policies, standards and procedures are addressed promptly, with appropriate consequences that may include disciplinary action, up to and including termination. These measures help ensure accountability and maintain the integrity of our ethical framework.

Solventum's executive leadership sets and promotes ethical standards within the organization, ensuring a strong operational compliance program. With this support, Solventum identifies new or evolving risks and develops strategies to prevent, detect and respond to ethics and compliance related issues. The board of directors receives regular compliance updates from Solventum's Chief Ethics and Compliance Officer regarding the effectiveness of Solventum's compliance program.

In addition, Solventum regularly reviews local HR policies and practices at our manufacturing sites globally, including a more formal review every other year. The last formal review was conducted in 2023 when Solventum was still part of 3M, with the next one planned for 2025. This review process also includes assessing compliance with the Human Rights Policy. All reviews include identification of strengths and opportunities for improvement and established actions, where necessary.

We comply with U.S. Federal Acquisition Regulation 52.222-50 which prohibits human trafficking, including slavery, servitude, forced and compulsory labor, and coercion to induce a commercial sex act or to procure the same.

Our Ethics & Compliance Department measures the health of our "speak up" culture by monitoring the number of calls to our reporting system and the anonymous call rate. A high call rate indicates employees are proactive in raising potential concerns and feel comfortable engaging through Solventum's established channels. We're proud that our call rate exceeds the 2024 benchmark of 1.5 reports per 100 employees, published by Navex, a company which hosts the world's largest database of employee incident reports, when compared to companies in the same industry, size and geographic footprint. Our anonymity rate is lower than published benchmarks, indicating a high level of trust in our investigation process.

In our supply chain:

The Solventum Supplier Responsibility Code is part of Solventum's contract provisions and purchase order terms and conditions and applies to the selection and retention of all Solventum suppliers globally. It explicitly prohibits forced labour, bonded labour, human trafficking, and child labour, and requires fair wages, working hours and safe conditions.

In 2024, we identified and partnered with a leading sustainable supply chain provider to continuously improve our suppliers' performance using our Due Diligence Management System, which aligns with the Organisation for Economic Co-operation and Development (OECD) due diligence framework. The system guides our efforts to establish strong policies, identify and assess risks and audit our supply chain, design and implement strategies to respond to identified risks, and report on supply chain due diligence activities.

Our Responsible Procurement team implements our supplier risk mapping, assessment and auditing program, with oversight by the procurement leadership team and a cross-functional committee.

Our annual supply chain risk assessment process applies to all suppliers and prioritizes higher-risk suppliers identified by geography, commodity and spend. The risk assessment allows Solventum to engage with the most relevant suppliers with a higher risk of modern slavery. The process begins with a self-assessment questionnaire that helps us understand supplier programs and determine if they meet our expectations. The self-assessment questionnaire is aligned with our Supplier Responsibility Code requirements.

Solventum or our third-party partners may conduct on-site sustainability audits as part of a verification process for suppliers in higher-risk categories. If we detect noncompliance with the Supplier Responsibility Code (SRC), we address any deficiencies through a Corrective Action Preventive Action (CAPA) process, which may include additional audits. If a supplier is unable or unwilling to resolve any gaps or findings, the CAPA process moves to the Responsible Procurement Supplier Issue Escalation process. If the supplier is still unwilling to work on the gaps or can't resolve them in a reasonable amount of time, a cross-functional team considers alternative actions to elevate and resolve the situation, which may include terminating the business relationship.

In addition to our global Supplier Responsibility Code expectations, certain areas require additional and specific formal expectations to drive more sustainable, responsible practices. Conflict-free supply chains are an integral part of our responsible procurement program and Supplier Responsibility Code. We support the goals and objectives of Section 1502 of the Dodd-Frank Act and report our due diligence efforts in our Specialized Disclosure Report to the U.S. Securities and Exchange Commission ("SEC") annually. See our Responsible Minerals Policy Statement for more details. Timber-based forest products pose potential risk of deforestation, forest degradation, free, prior and informed consent violations or unsafe labor practices. To positively influence practices throughout the forest product supply chain, we require suppliers to sign contracts and purchase order terms stating that Solventum will only receive materials containing plant derivatives that are legally sourced, harvested and exported from their country of origin. Suppliers are expected to establish policies and management systems in compliance with applicable global laws, and to ensure their own suppliers also adopt these standards.

As a new company, we did not conduct any audits during the 2024 reporting period. Our primary focus was on establishing the structures and processes necessary for due diligence management system compliance. Partnering with a leading sustainable supply chain provider specializing in human rights due diligence has enabled us to efficiently and comprehensively meet due diligence requirements. We commenced supplier audits in 2025 and are committed to continuing these audits in future reporting periods to ensure ongoing compliance with due diligence standards.

Our Due Diligence Process has successfully been audited by the NHS Labor Standards Assurance System (LSAS) audit.

Modern slavery risk training

Employees are assigned training based on their role and areas of responsibility, with courses including both e-learning and live training opportunities. Solventum provides training globally to Solventum employees to communicate and reinforce the expectation and requirement that they will comply with the law, our Code of Conduct, and supporting policies, standards, and procedures, including those related to human rights. For example, all employees are required to complete the Code of Conduct course upon hire and then annually thereafter. On-time completion rates are tracked by our Ethics & Compliance. Department and full participation is encouraged through a series of reminders to the employee, their immediate supervisors and senior leaders.

We expect our suppliers to share our commitment to maintaining compliant, responsible, safe and sustainable operations and practices. In addition to full compliance with all applicable labour and human resource laws, we expect our suppliers to be committed to upholding the human rights of workers and to treating them with dignity and respect as understood by the global community. Through our third party system, we offer comprehensive supplier training on Modern Slavery and Human Rights. This collaboration ensures that our suppliers are well-informed and compliant with the latest standards and practices, reinforcing our commitment to ethical and responsible procurement.

Ongoing commitment

We are dedicated to continuous improvement in the areas of Modern Slavery and Human Rights. Our commitment to ethical practices drives us to regularly enhance our processes and training programs, ensuring that we remain at the forefront of responsible procurement and supplier compliance.