

Report of Organizational Actions
Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
3M Company		41-0417775	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
3M Investor Relations Department	651-737-6523	investorrelations@3m.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and ZIP code of contact	
3M Center, Bldg. 223-02-N-20		St. Paul, MN 55144-1000	
8 Date of action	9 Classification and description		
April 1, 2024	3M Company common stock – spin-off		
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
88579Y101	Not Applicable	MMM	Not Applicable

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ► [See attachment.](#)

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ► [See attachment.](#)

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ► [See attachment.](#)

3M Company
EIN: 41-0417775
Attachment to Form 8937

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (the “Code”). This attachment includes a general summary regarding certain U.S. federal income tax laws and regulations relating to the effects of the Distribution (as defined below) on the tax basis of shares of 3M Company (“3M”) common stock, and the allocation of tax basis between shares of 3M common stock and shares of Solventum Corporation (“Solventum”) common stock pursuant to the Distribution.

DISCLAIMER: The information provided on Form 8937 and within this attachment is based on the intended tax treatment of the Distribution as a distribution pursuant to Section 355 and does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of shareholders. Neither 3M nor Solventum provides tax advice to its shareholders and the example provided below is merely illustrative. Shareholders, including shareholders that hold different blocks of shares (i.e., shares acquired at different times or different prices), are urged to consult their own tax advisors regarding the Distribution and the particular consequences to them, including the applicability and effect of all U.S. federal, state, local, and foreign tax laws, and to read the Information Statement, dated and filed by Solventum with the Securities and Exchange Commission on February 20, 2024, as amended or supplemented through the date hereof, noting the discussion therein under the heading “Material U.S. Federal Income Tax Consequences.” You may access the Information Statement at www.sec.gov.

Part II

Line 14. Describe the organizational action and, if applicable, the date of the action or the date against which shareholders’ ownership is measured for the action.

On April 1, 2024, at 3:30 a.m. EDT, pursuant to the terms and conditions of the Separation and Distribution Agreement dated March 31, 2024 by and between 3M and Solventum, 3M distributed to its shareholders on a pro rata basis approximately 80.1 percent of the outstanding shares of Solventum common stock (the “**Distribution**”). Pursuant to the Distribution, each 3M common shareholder received one share of Solventum common stock for every four shares of 3M common stock held as of the record date, March 18, 2024. No fractional shares of Solventum common stock were issued. All fractional shares of Solventum common stock that the 3M common shareholders otherwise would have been entitled to receive as a result of the Distribution were aggregated and sold on the open market at then-prevailing market prices, and the resulting cash proceeds of the sale were paid to such shareholders on a pro rata basis based on such shareholder’s respective fractional interests.

Line 15. Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis.

As a result of the Distribution, 3M common shareholders will be required to allocate the aggregate tax basis in their shares of 3M common stock held immediately prior to the Distribution between the shares of Solventum common stock received in the Distribution (including any fractional share interest in

Solventum common stock for which cash was received by the shareholder) and their shares of 3M common stock held immediately after the Distribution. This allocation should be made in proportion to the relative fair market values of the Solventum common stock and the 3M common stock.

A holder of 3M common stock that acquired different blocks of shares of 3M common stock at different times or at a different price should consult its tax advisors regarding the determination of its basis in shares of Solventum common stock received in the Distribution in respect of particular blocks of 3M common stock.

Fair market value generally is the price at which property would change hands between a willing buyer and a willing seller, neither being under any compulsion to buy or to sell and both having reasonable knowledge of the facts. U.S. federal income tax law does not specifically prescribe how a shareholder should determine the fair market values of the 3M common stock and the Solventum common stock for purposes of allocating the shareholder's tax basis. Shareholders should consult their own tax advisor to determine what measure of fair market value is appropriate.

There are several possible methods for determining the fair market values of 3M common stock and Solventum common stock. One possible approach is to utilize the New York Stock Exchange closing trading prices on April 1, 2024 for 3M common stock (\$94.02 per share) and Solventum common stock (\$69.10 per share) as an indication of the fair market value.

Based on that approach and the assumptions and calculations set forth in Line 16 below, 84.48% of a 3M shareholder's aggregate tax basis in his or her shares of 3M common stock immediately prior to the Distribution would be allocated to such shareholder's shares of 3M common stock following the Distribution and 15.52% would be allocated to such shareholder's shares of Solventum common stock received in the Distribution (including any fractional share interest in Solventum common stock for which cash was received by the shareholder). Other approaches to determine fair market value may also be possible. 3M shareholders are not bound by the approach illustrated herein and may, in consultation with their tax advisors, use another approach in determining fair market values for 3M common stock and Solventum common stock.

Line 16. Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates.

As described in Line 15 above, in general, 3M common shareholders will be required to allocate the aggregate tax basis in their shares of 3M common stock held immediately prior to the Distribution between the shares of Solventum common stock received in the Distribution (including any fractional share interest in Solventum for which cash was received by the shareholder) and their shares of 3M common stock held immediately after the Distribution.

The following is an example illustrating the tax basis rules described above.

Assumptions:

- Shares of 3M common stock owned immediately prior to the Distribution: 400
- 3M common shareholder's aggregate tax basis (assumed to be \$200.00 per share): \$80,000
- Shares of Solventum common stock received in the Distribution (400 shares of 3M common stock multiplied by the distribution ratio of 1:4): 100

Tax Basis Allocation:

	# of Shares Owned (A)	Assumed Beginning Basis (B)	Price (C)	FMV of Shares Owned Post-Distribution (A) x (C)	% of Total FMV (D)	Allocated Tax Basis (B) x (D)
3M common stock	400 ¹	\$80,000 ²	\$94.02 ³	\$37,608.00	84.48% ⁵	\$67,582.55
Solventum common stock	100		\$69.10 ⁴	\$6,910.00	15.52% ⁶	\$12,417.45
Total				\$44,518.00	100.00%	\$80,000.00
¹ Number of shares of 3M common stock owned immediately prior to the Distribution. ² Aggregate tax basis in the shares of 3M common stock owned immediately prior to the Distribution. ³ Closing market price of 3M common stock on April 1, 2024. ⁴ Closing market price of Solventum common stock on April 1, 2024. ⁵ \$37,608.00/\$44,518.00 (rounded) ⁶ \$6,910.00/\$44,518.00 (rounded)						

Line 17. List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

Sections 355, 358, 368, 1001, and 1223(1).

Line 18. Can any resulting loss be recognized?

No loss may be recognized by a 3M common shareholder upon the receipt of Solventum common stock in the Distribution, except with respect to cash received in lieu of a fractional share of Solventum common stock.

Line 19. Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The Distribution was effective on April 1, 2024. For individuals and other 3M common shareholders whose taxable year is the calendar year, the reportable tax year is 2024.


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Completed	Security Checked	4/8/2024 12:29:44 PM

Payment Events	Status	Timestamps
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