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3M Business Conduct Policies

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Business
Conduct Policies

Each of Us Integrity
Trust
Reputation
Our Company

July 2007

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Our Commitment to Legal and Ethical Business Conduct

January 2006

I believe 3M to be a special company, a company of people proud of their past and excited about their future. Above all, it is a company defined by the character and integrity of its people. As we work to serve our customers, to build strong technology and product positions, and to innovate and create, we must always keep paramount in our minds the importance of advancing our outstanding reputation through our personal integrity, our shared values and through our consistently ethical and honest business conduct.

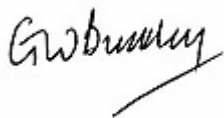
Those concepts are stated clearly as our corporate values:

- Act with uncompromising honesty and integrity in everything we do
- Satisfy our customers with innovative technology and superior quality, value and service
- Provide our investors an attractive return through sustainable, global growth
- Respect our social and physical environment around the world
- Value and develop our employees' diverse talents, initiative and leadership
- Earn the admiration of all those associated with 3M worldwide

I know that you will continue to apply these values as the basis for your everyday behavior and decision-making. In addition, your ongoing attention and adherence to 3M's Business Conduct Policies are essential to our success.

As we work together to build a strong future, we will all continue to live our values, and apply the high standards embodied in the 3M Business Conduct Policies every day and all of the time.

All of our constituencies expect this of us. More importantly, we expect it of ourselves.



George W. Buckley
Chairman, President and CEO



How to Use These Policies

Explanation on how to use 3M Business Conduct Policies

3M's Business Conduct Policies apply to employees and others acting on 3M's behalf around the world. As global policies, they apply to all locations and situations where 3M business is conducted and to all company-sponsored events. These policies contain the information you need to understand your business conduct responsibilities at work. Of course, additional policies apply to various 3M business operations, and you need to know and follow those other policies that apply to your 3M work, as well. Most policies are presented in a format featuring (1) a policy statement, (2) an explanation of what the policy means, and (3) examples of situations to avoid in order to maintain compliance with the policy. This website also includes details on where to go to ask questions and how to raise a concern about a Business Conduct Policy.

NOTE: By establishing and communicating these 3M Business Conduct Policies, 3M does not intend to create enforceable contractual rights for the benefit of any person or entity.

What These Policies Require

Explanation on what is required of anyone representing 3M in different roles.

These Business Conduct Policies help employees and others acting on 3M's behalf take a consistent, global approach to key compliance issues. 3M employees, including supervisors, managers and other leaders are responsible for understanding the legal and policy requirements that apply to their jobs and for reporting any suspected violations of law or these policies.

3M Business Conduct Policies apply to all parent company and subsidiary employees throughout the world. They also apply to employees of joint ventures and other business affiliates in which 3M has a controlling interest. These global policies apply to all locations and situations where 3M business is conducted and to all company-sponsored events.

... Of 3M Employees

Every 3M employee needs to:

- Read the introductory sections of this website/manual, so you know what is required of you and how 3M's compliance program works.
- Know the issues covered by each Business Conduct Policy.
- Understand, in detail, those Business Conduct Policies that relate to your work responsibilities. Additional details employees need to know about these policies can be found on the 3M Employee Business Conduct website (intranet.mmm.com/businessconduct). You don't need to memorize all the details, but you need to know the policies that apply to your job well enough that you will know when to come back to the policies for details, and when to seek help from the resources listed in the *Where to Go with Questions* subsection of this website/manual.
- Know that violating a 3M Business Conduct Policy is a serious matter that can result in disciplinary action, up to and including immediate termination of employment.
- Use company resources available to you, including your management and assigned 3M legal counsel, when you need help determining whether a Business Conduct Policy or law applies or what it requires of you.
- Understand the various ways you can report a business conduct concern by reading the *How to Report a Suspected Violation of These Policies* subsection of this website/manual.
- Know that you have several ways to report a business conduct concern anonymously, unless anonymous reporting is not permitted by law in your country, as detailed in the *What If You Wish to Remain Anonymous* subsection of this website/manual.
- Be assured that the company prohibits retaliation against anyone who raises a business conduct concern in good faith or cooperates in a company investigation.
- Support 3M's compliance program by promptly complying with your obligation to report concerns or suspected violations of any law or Business Conduct Policy.

- Provide any assistance the company needs when 3M investigates a possible violation of a law or Business Conduct Policy.
- If asked, sign a statement acknowledging you have read the 3M Business Conduct Policies and will comply with the law and 3M Business Conduct Policies.
- Periodically revisit 3M's Business Conduct Policies to refresh your recollection and ensure that you keep abreast of recent policy revisions.

... Of Others Acting on 3M's Behalf

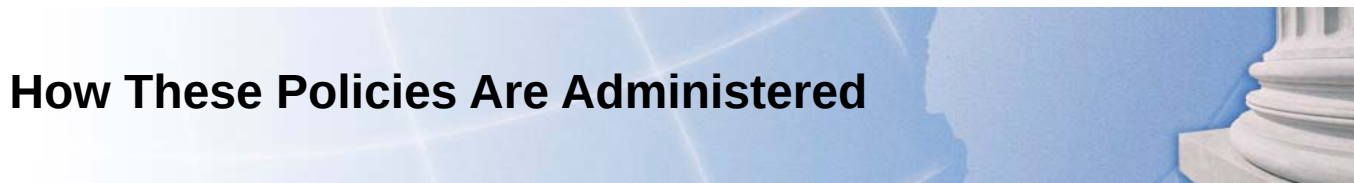
All 3M business units and staff groups must require that any third party acting on 3M's behalf, such as a consultant, agent or independent contractor, agree to follow applicable 3M policies. 3M managers and employees must:

- Require the third party to comply with relevant 3M policies and provide appropriate training so the third party understands the requirements of the policies.
- Monitor the third party's work, and take necessary action, up to and including immediately terminating 3M's engagement with the third party in the event the party fails to honor the agreement to abide by 3M policies.

... Of 3M Leadership

3M supervisors, managers and other leaders have additional responsibilities for employees and others acting on 3M's behalf. 3M leaders, up to and including the Chief Executive Officer, the Chief Financial Officer and other members of senior management, must:

- Ensure that everyone in your area of responsibility understands and complies with laws and 3M policies that relate to 3M business activities.
- Create a work environment in which employees and others acting on 3M's behalf understand that you believe in 3M's values and are not merely paying lip service to 3M's commitment to doing business the right way.
- Take steps to prevent violations of law and 3M policies by taking the initiative to address compliance risk areas and provide necessary compliance training to your organization.
- Detect and report violations of law and 3M policies.
- Take prompt and appropriate action to address violations, and correct process failures that allowed the violations to occur.
- Ensure that anyone who reports a suspected violation in good faith or who cooperates in a company investigation is protected from retaliation.



How These Policies Are Administered

Explanation on how the 3M Business Conduct Policies are administered.

The 3M Business Conduct Committee, consisting of several senior executives and chaired by 3M's Senior Vice President, Legal Affairs and General Counsel, has responsibility for overseeing 3M's legal and ethical compliance program. The Business Conduct Committee reports to the Audit Committee of the 3M Board of Directors, which assists the Board of Directors in oversight of 3M's legal and regulatory compliance program.

3M's compliance program is administered by the Central Compliance Department, led by the Director of Business Conduct and Compliance. The Central Compliance Department oversees the strategic, systematic and operational components of 3M's compliance program design and implementation. The Department also focuses on implementing the initiatives of the Business Conduct Committee in such areas as compliance policy drafting, compliance risk analysis, education, communication strategy and program awareness, coordination of investigations and continuous process improvement.

The Central Compliance Department is assisted by dedicated compliance organizations in the areas of government contracting, health care regulatory, and environmental health and safety. In addition, 3M utilizes a network of part-time Compliance Contacts in every business unit and staff group who assist the Central Compliance Department in ensuring that their organizations continuously demonstrate legal compliance and ethical business conduct. Compliance Contacts assist in business conduct policy training, communications and completing periodic risk assessments for their organizations.



If You Have a Business Conduct Concern

Upholding 3M's Business Conduct Policies and values is the responsibility of everyone acting on 3M's behalf. It is also everyone's responsibility to raise a concern promptly about a possible violation of 3M policy or law. It is vital to address problems early while they are small and more easily fixed. Serious damage, fines, penalties and loss of confidence in 3M can result if small problems are allowed to grow into big ones.

Where to Go with Questions

No written policy can anticipate all the situations and circumstances to which the policy might apply. If you have a question about a Business Conduct Policy, how the policy relates to your job or how a policy may apply to a specific situation, you can go to any of the resources listed in *How to Report a Suspected Violation of these Policies* subsection.

How to Report a Suspected Violation of These Policies

Most days, you don't have to look very hard to find newspaper articles about companies facing investigations and litigation concerning illegal or unethical behavior. No company - no matter how good its compliance program and corporate culture are - should be so naïve as to think it will never have a legal or ethical compliance issue. The measure of a good company, and a good compliance program, is whether a company finds problems early and fixes them while they are small. The best way for 3M to find out early about suspected violations is when employees and others acting on 3M's behalf support the compliance program by being the "eyes and ears" of compliance in the company.

Studies show that many people are reluctant to report a suspected violation involving a coworker. To address this natural reluctance, 3M has a strict policy prohibiting retaliation against anyone who raises a business conduct concern in good faith or cooperates in a company investigation. We stress with our employees and others acting on 3M's behalf that reporting a suspected violation is the right thing to do, because every violation of law or 3M policy creates risk for employees, the company, customers and the communities in which 3M operates.

You have a number of options to report what may be a violation of 3M Business Conduct Policy or law. You can raise a concern orally or in writing to:

- **Your management.** You can go to your direct supervisor or manager, or to a higher level of your management, if you prefer. Because your management is closest to the issue, this may be the best place to go to resolve an issue quickly.
- **Your assigned 3M legal counsel.**

- **3M-ethics.com.** This website is operated by a third party vendor, EthicsPoint. EthicsPoint is an independent, professional reporting service retained by 3M to assist with the receipt of questions or business conduct concerns. From this site, you may submit your concern by completing a web-based form or by calling the toll-free Helpline. EthicsPoint offers confidential and anonymous reporting 24 hours a day, with the ability to report concerns in many languages.
- **The 3M Director, Business Conduct and Compliance**
220-9-E-02, 3M Center
3M Company
Saint Paul, MN 55144-1000
Telephone : 1-651-733-1540, (3M Triminet) 733-1540

If you are raising a concern under the 3M *Harassment Policy*, you also can go to your local Human Resources Manager or someone higher in the 3M Human Resources organization.

If you are raising a concern regarding accounting, financial reporting, internal accounting controls or auditing matters, you also can go to:

General Auditor
3M Corporate Auditing Department
224-06-N-11, 3M Center Saint Paul, MN 55144-1000
Telephone : 651-733-3252, (3M Triminet) 733-3252

What If You Wish to Remain Anonymous

First consider whether you are comfortable raising your concern directly within 3M, such as to your manager or to someone else in your department. 3M has found that internal concerns usually can be resolved most quickly and satisfactorily when they are raised with internal resources such as management or human resources. If you are uncomfortable doing so, if you do not know whom to contact, or if you believe your concern has not been satisfactorily addressed, you can submit your concern anonymously (unless anonymous reporting is prohibited by law in your country) by using the following options:

- You can go to **3M-ethics.com**. EthicsPoint does not trace phone calls or use Caller Identification. In addition, EthicsPoint does not generate or maintain internal connection logs containing Internet Protocol (IP) addresses, so no information linking your computer to EthicsPoint would be available. Reports from your computer would come through a secure Internet portal, which does not trace or show user screen names. Finally, EthicsPoint removes Internet addresses to ensure that anonymity in the EthicsPoint system is maintained. EthicsPoint will not use information reported to it for any purpose other than passing along the information to 3M for appropriate handling.

At the end of your telephone call or web-based report, EthicsPoint will provide you with a report key and ask you to create a password. You will be asked to telephone 3M's Business Conduct Helpline, operated by EthicsPoint, or visit the EthicsPoint website two or three business days after you make your initial report. At that time, you can monitor progress on your report and learn whether any additional information is needed from you to address your concern.

- You can mail a letter to the Director, Business Conduct and Compliance, at the address above.

If you choose to identify yourself in reporting your concern, 3M will make every reasonable effort to hold your name in confidence during the investigation.

How 3M Will Respond to a Report

If warranted, 3M will commence an appropriate investigation, using internal or external resources with expertise in conducting investigations. The information in your report is shared with appropriate investigation team members, and the concern is investigated promptly and discreetly. You will be notified at the conclusion of the investigation. If you do not believe your concern has been adequately addressed, please raise it with another of those resources listed in *How to Report a Suspected Violation of these Policies* subsection.



Retaliation is Prohibited

3M prohibits retaliation against anyone who raises a business conduct concern or cooperates in a company investigation. The Company will not permit any sanction against you for making a good-faith complaint, regardless of whether the underlying facts prove to be correct or result in any corrective action.

If you believe you are being retaliated against for raising a good-faith business conduct concern, you may report this to any of the resources listed in the *How to Report a Suspected Violation of These Policies* section or you can report it using a toll-free telephone number or online reporting form available at www.3M-ethics.com.

3M Business Conduct Policies



Doing Business Legally and Ethically

The foundation of 3M's business conduct program is this: we will do business legally and ethically in all aspects of our global operations. The policies in this section describe the requirement that employees and others acting on 3M's behalf must abide by all laws and company policies at all times. This section also provides some guidelines for making ethical decisions, which you should use in those situations where neither law nor policy tells you exactly what you must do.

The framework for 3M's legal and ethical compliance program is the Compliance Policy and the Ethical Business Conduct Guidelines.

Compliance Policy

Applies To All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.

Policy Statement 3M is recognized worldwide as an ethical and law-abiding company. Although the company has business operations in more than 60 countries, 3M has only one set of business conduct policies that apply globally. These universal standards provide a framework for conducting business the right way – legally and ethically – everywhere 3M does business. It is 3M policy that employees and others acting on 3M's behalf must comply with all laws and 3M Business Conduct Policies.

As a global company, 3M is regulated by many different country, state and local laws simultaneously. In addition to complying with 3M's Business Conduct Policies related to 3M business activities, you must abide by all laws that apply to you wherever you live or work.

Additional Elements

Penalties for violations

Employees who violate a law or 3M Business Conduct Policy related to their business activities are subject to appropriate discipline, up to and including immediate termination of employment. Also subject to discipline are employees who:

- Fail to seek legal advice from assigned 3M legal counsel.
- Act contrary to advice from 3M legal counsel.
- Fail to provide information concerning a suspected violation of law or these policies.
- Retaliate against anyone for reporting a suspected violation.

3M's response to violations or other actions contrary to these policies will be based on the individual circumstances of each situation.

Employees and others acting on 3M's behalf who violate a 3M policy might also be breaking a law that could expose themselves and 3M to substantial criminal fines, prison terms and civil damages under national and local laws around the world.

Related Information

- Frequently Asked Questions
- Ethical Business Conduct Guidelines

For Further Information	John M. Stoxen Director, Business Conduct and Compliance jmstoxen@mmm.com or Gwen N. Schwebel Sr. Paralegal II gnschwebel@mmm.com
Approved By	Business Conduct Committee
Original Issue Date	January 1993
Revision Date	
Version Number	1095
Geographic Relevancy	Worldwide

Ethical Business Conduct Guidelines

Applies To All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.

Guideline Statement Ethical business conduct sometimes requires more than strictly complying with the law. Moreover, there are no laws governing many business activities. Even when laws apply, sometimes they set a standard of behavior that is unacceptably low for 3M. When you are confronted with such situations, you need to make a good, ethical decision that will reflect well on 3M and you. These guidelines contain advice to help you do that.

Additional Elements 3M's higher standard

3M Business Conduct Policies provide guidance for many situations, but this website/manual cannot cover every possible issue you may face in the course of 3M business. In these cases, your actions should be guided by our fundamental values of uncompromising integrity and honesty. These values include promise keeping, fairness, respect and concern for others, and personal accountability.

Ethical decision-making requires evaluating and giving due consideration to alternative courses of conduct in light of these corporate standards:

- Show uncompromising honesty and integrity in all of your 3M activities and relationships.
- Avoid all conflicts of interest between work and personal life.
- Respect the dignity and worth of all individuals.
- Encourage individual initiative and innovation in an atmosphere of flexibility, cooperation and trust.
- Promote a culture where promise keeping, fairness, respect and personal accountability are valued, encouraged and recognized.
- Create a safe workplace.
- Protect the environment.

Making ethical decisions

You should be able to answer "yes" to the following questions before taking any action on behalf of 3M.

- ✓ Is this action consistent with 3M's corporate values of uncompromising honesty and integrity?
- ✓ Can this action withstand public scrutiny?
- ✓ Will this action protect 3M's reputation as an ethical company?

If you can't answer "yes" to all these questions, but still believe the proposed action is lawful and ethical, you should review the proposed action with your supervisor, management or your assigned 3M legal counsel because it may not in the best interest of 3M or you to proceed.

Related Information

Frequently Asked Questions

For Further Information

John M. Stoxen
 Director, Business Conduct and Compliance
jmstoxen@mmm.com
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 Gwen N. Schwebel
 Sr. Paralegal II
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Approved By

Business Conduct Committee

Original Issue Date

May 1988

Revision Date

Version Number

1094

Geographic Relevancy

Worldwide



Protecting 3M's Reputation and Assets

3M's reputation is earned every day – in all of our locations by all of our people. Our reputation is the result of our products performing as we say they will perform, keeping our promises to our customers and holding to the highest standards of financial and business integrity. People must have confidence in the accuracy and thoroughness of 3M's accounting and reporting systems. At the same time, we must protect 3M's assets -- physical property, equipment, trademarks, intellectual property, electronic files and confidential information. We cannot allow our stewardship of these assets to be influenced by personal, family or other outside interests that may conflict with 3M's best interests.

Our policies for protecting 3M's reputation and assets include:

- Business Gifts and Entertainment
- Conflict of Interest
- Electronic Resources
- Information Security and Confidentiality
- Internal Controls, Financial Reporting, Document Retention and Auditing
- Securities Trading and Insider Information

Business Gifts and Entertainment Policy

Applies To All 3M employees worldwide and others acting on 3M’s behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.

Policy Statement The term “business gifts” in this policy includes business entertainment, as well as gift items. The giving of business gifts is a customary way to strengthen business relationships and, with some restrictions, is a lawful business practice. It is 3M policy that company employees may give and receive appropriate, lawful business gifts in connection with their 3M work with commercial customers and other nongovernmental parties, provided that all such gifts are nominal in value and not given or received with the intent or prospect of influencing the recipient’s business decision-making.

Special laws and rules apply to gifts to government employees and it is 3M policy to strictly comply with all such restrictions. Local laws in the United States and around the world strictly limit gifts to government employees. These may be criminal acts, regardless of whether they are paid for with 3M or personal funds. For gifts to commercial and government customers outside the United States, see the *3M Transacting International Business Policy*.

Bribery is illegal and violates this policy. 3M policy does not allow for corrupt practices in any form, including bribery.

Even when legal, employees cannot give or receive business gifts if doing so would violate this policy. Any business gifts given or received by a 3M employee must be nominal in cost, quantity and frequency. Never accept or offer gifts of cash or cash equivalents, such as gift certificates. Never accept a gift that could be viewed as lavish.

Additional Elements

What it means

- No 3M employee may give or receive a gift that violates the law, regulations, agreements or reasonable customs of the marketplace.
- Make sure any business gift is nominal in cost, quantity and frequency and that the gift can withstand public scrutiny without damaging 3M’s reputation.
- Gifts of 3M consumer products are generally likely to be appropriate, as are gifts of items that are marked with 3M promotional labeling.
- Properly record any business gift on your business unit’s books and

make sure that it complies with any policies of your specific 3M business unit.

- When deciding on the appropriateness of giving or receiving a business gift, consider how the gift compares in value to the usual gift-giving practices in your industry and country, the sum of gifts to or from that entity over time, the suitability of the gift given your position at 3M, the impact of the gift on building positive business relations with the recipient, and how the gift might look to an outsider.
- These guidelines apply even when no reimbursement from the company is sought.
- If you plan to give or accept a business gift of more than a nominal value, you must inform your supervisor.
- Coffee, doughnuts, soft drinks and similar refreshments of nominal value provided other than as part of a meal are not considered to be gifts under the gift rules for executive branch employees. Therefore, these types of nominal refreshments may be provided to executive branch employees. Do not be offended if they seek to make reimbursement, however, and accept any such payment.
- Consult with your assigned 3M legal counsel before giving business gifts to consultants and employees of state and local government agencies.

What to avoid

- Giving or receiving money or other cash equivalent as a business gift.
- Giving business gifts to U.S. government employees. Although U.S. executive branch employees may lawfully accept some nominal gifts, the gift rules for U.S. judicial and legislative branches differ from the executive branch and are sometimes even stricter. Because of these strict limitations, 3M employees should avoid giving gifts to any U.S. government employees, including military personnel, regulatory agency employees and U.S. government employees located outside the United States.
- Giving or receiving gifts that are too costly or frequent to be within the customs of the marketplace.
- Giving any gift to reward a government employee.

- Giving or receiving gifts that influence or give the appearance of influencing business judgment.
- Offering a gift if you know it would violate the recipient's policy to accept it.
- Giving or receiving entertainment, such as tickets to a sporting event, where a representative of the company offering the gift will not be accompanying the recipient to the event.

**Related
Information**

- 3M Transacting International Business Policy

**For Further
Information**

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Approved By Business Conduct Committee

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**Geographic
Relevancy** Worldwide

Conflict of Interest Policy

Applies To All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.

Policy Statement It is 3M policy that employees and others acting on 3M's behalf must be free from conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the company in conducting 3M business activities and assignments. The company recognizes that employees may take part in legitimate financial, business and other activities outside their 3M jobs, but any potential conflict of interest raised by those activities must be disclosed promptly to management.

Additional Elements

What it means

- Request management approval of outside activities, financial interests or relationships that may pose a real or potential conflict of interest. Remember that management approval is subject to ongoing review, so you need to periodically update your management regarding your involvement.
- Avoid personal relationships with other 3M employees where parties in the relationship may receive or give unfair advantage or preferential treatment because of the relationship.
- Avoid actions or relationships that might conflict or appear to conflict with your job responsibilities or the interests of 3M.
- Even the appearance of a conflict of interest can damage an important company interest.
- Obtain necessary approvals before accepting any position as an officer or director of an outside business concern.
- Contact the director of Community Affairs (in the United States) or your human resources manager (in other countries) and notify your management prior to serving on the board of directors of a bona fide charitable, educational or other nonprofit organization.

What to avoid

- Working with a business outside your 3M responsibilities that is in competition with any 3M business.
- Accepting a gift that does not meet the standards in the 3M

Business Gifts and Entertainment Policy.

- Having a direct or indirect financial interest in or a financial relationship with a 3M competitor, supplier or customer (except for insignificant stock interests in publicly-held companies).
- Taking part in any 3M business decision involving a company that employs your spouse or family member.
- Having a second job where your other employer is a direct or indirect competitor, distributor, supplier or customer of 3M.
- Having a second job or consulting relationship that affects your ability to satisfactorily perform your 3M assignments.
- Using nonpublic 3M information for your personal gain or advantage, or for the gain or advantage of another, including the purchase or sale of securities in a business 3M is interested in acquiring, selling or otherwise establishing or terminating business relations with.
- Investing in an outside business opportunity in which 3M has an interest, except for having an insignificant stock interest in publicly-held companies.
- Receiving personal discounts or other benefits from suppliers, service providers or customers that are not available to all 3M employees.
- Receiving personal honoraria for services you perform that are closely related to your work at 3M. Your supervisor should approve occasional honoraria, such as for a university presentation or symposium.
- Having romantic relationships with certain other employees where:
 - there is an immediate reporting relationship between the employees.
 - there is no direct reporting relationship between the employees but where a romantic relationship could cause others to lose confidence in the judgment or objectivity of either employee, or the relationship could cause embarrassment to the company.

Note: In some circumstances, romantic relationships between employees may raise compliance issues under the *3M Harassment Policy*.

Related Information

- 3M Business Gifts and Entertainment Policy
- 3M Harassment Policy
- Frequently Asked Questions

For Further Information

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Geographic Relevancy Worldwide

Electronic Resources Policy

Applies To All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.

Policy Statement 3M's electronic resources provide many tools through which information can be shared around the globe. The efficient use of electronic resources contributes to 3M's success. It is 3M policy that the company's electronic resources be used only in ways that do not violate the law, 3M's Business Conduct Policies or *3M Information Policies*. 3M employees must also protect 3M electronic resources from unauthorized uses and security threats.

The term "3M electronic resources" means all electronic devices, software, systems and networks, directly or through a third party, used to transmit, receive, process or store 3M information or data. 3M electronic resources include, but are not limited to, computers, servers, databases, PDAs, telephones, wireless devices, e-mail systems, voice messaging systems, Internet connectivity and 3M TV. It also includes the use of non-3M-owned electronic resources storing or connecting to 3M data. This policy applies whenever and wherever 3M electronic resources are accessed and used.

3M allows reasonable and limited personal use of 3M electronic resources by employees. Employee personal use must be occasional and brief, must not unduly burden 3M's resources and systems, must comply with all laws and 3M policies, and must not interfere with normal business activities or the employee's ability to meet job expectations. In addition, employee personal use for outside business ventures, personal financial gain, political fundraising or other political purposes is prohibited.

3M reserves the right to monitor or access employee communications or other materials created, received, stored, transmitted or processed using 3M's electronic resources, at any time and without notice, where there is a business reason to do so and as permitted by law. For this reason, users of 3M's electronic resources should not have an expectation of privacy in e-mails, documents, files, voice files or other communications or materials created, received, stored, transmitted or processed using 3M electronic resources, unless required by law.

Additional Elements

What it means

- Use 3M electronic resources in accordance with 3M policies and applicable laws, including 3M policies and laws regarding

information security, confidential information, privacy, harassment, political activities, software implementation and record retention.

- Take appropriate measures to protect the security, confidentiality and integrity of 3M electronic data and information, as required under 3M policies and applicable laws. For example:
 - Protect User IDs (UPINs) and passwords for 3M electronic resources and ensure their proper use. Passwords are confidential information.
 - Ensure that your workstation and mobile devices connecting to 3M networks meet corporate standards. Do not uninstall or disable 3M-provided security solutions, such as anti-virus tools, firewalls or password-protected screensavers.
 - Lock workstations when left unattended.
 - If using 3M electronic resources in public places, take appropriate measures to protect 3M confidential information. For example, when using your laptop computer on airplanes or in hotel lobbies, use a supported privacy screen filter.
 - Use only properly licensed copies of computer software. Do not copy or use software licensed to 3M unless 3M's license from the software publisher permits the copying or use.
- Limit your personal use of 3M electronic resources. Make sure your use is occasional and brief, does not unduly burden 3M's resources and systems, complies with all 3M policies, and does not interfere with normal business activities or your ability to meet job expectations.
- Be aware that 3M reserves the right to access and monitor 3M electronic resources and employee use of those resources, as permitted by law.
- For more information about 3M Electronic Resources, see the Electronic Resources Standards.

What to avoid

- Using electronic resources in a manner that violates any law or 3M Business Conduct Policy.
- Using electronic resources in a manner inconsistent with a respectful business environment or which violates 3M's

Harassment Policy, for example, by sending offensive or harassing messages or downloading or viewing sexually explicit or other offensive material.

- More than occasional, brief personal use of 3M electronic resources.
- Using 3M electronic resources for outside business ventures, personal financial gain, political fund-raising or other political purposes.
- Downloading, copying or using software or other materials in violation of copyright laws or license restrictions.
- Posting a list of passwords next to your workstation.
- Disabling any 3M-required software.
- Using the 3M email system to send personal photos or other large non-business files, which can negatively impact 3M network operations.

**Related
Information**

- Frequently Asked Questions
- 3M Information Policies

**For Further
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Information Security and Confidentiality Policy

Applies To All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.

Introduction 3M's confidential information is a valuable asset. In the course of doing business, we must regularly exchange information with others, both inside and outside 3M. Safeguarding our ideas, technologies, processes, plans and other company information is essential for managing our business, maintaining competitive advantage, and complying with certain legal requirements.

Information security includes protecting 3M confidential information, protecting 3M electronic resources, providing physical security, and ensuring 3M information is available when needed and is not corrupted, either accidentally or intentionally.

Examples of 3M confidential information include financial data; trade secrets; sales figures; information about employees, customers or suppliers; wage and salary data; capital investment plans; earnings projections; testing data; plans to improve products; documents containing product formulas or drawings; records of invention; unpublished patent applications, technical reports; proprietary manufacturing methods and processes; pricing and profit information; and information about future products, marketing, advertising programs or management changes.

Policy Statement Employees and others acting on 3M's behalf are responsible for protecting 3M's confidential information from unauthorized disclosure whether internal or external, deliberate or accidental. Employees and others acting on 3M's behalf must know:

- The information classification of the 3M information they create or have access to (3M Confidential Information, Internal Use Only, or External Release)
- The security precautions that apply to 3M information, and
- How long to retain 3M information, and how to properly dispose of it.

Just as we expect others to respect our company's confidential information, 3M respects the confidential information of other parties. It is 3M policy to use only legal and ethical means to collect and use business and market information in order to better understand our markets, customers and competitors. 3M will not collect or use another party's confidential

information without that party's permission.

Additional Elements

What it means for 3M confidential information

- Protect 3M confidential information regardless of the media in which the information is conveyed (e.g., printed, electronic files, e-mail, verbal conversation).
- Protect 3M confidential information for the entire life cycle of the information--from creation, storage, use, transmittal, retention through disposal.
- Contact your assigned 3M legal counsel if you need help determining whether certain information is confidential.
- Share confidential information inside 3M only with those who have a business need to know the information.
- Have a written, signed confidential disclosure agreement before disclosing confidential information to a party outside 3M. Confidential disclosure agreements must be signed by a general manager or technical director, or higher level.
- Wear your 3M identification badge while at 3M facilities and ensure that others are authorized to be in your area and are authorized to have access to 3M business information.
- Retain all 3M information in accordance with 3M's Records Retention Schedule. If you have received a Preservation Notice, immediately take steps to preserve all potentially pertinent records and files.
- Promptly report any actual or suspected unauthorized access to 3M systems or 3M information to:
 - o Your manager,
 - o Corporate Security at 651-733-6100 (available 24 hours)
 - o IT Security and Integrity. List of local Information Security Contacts
 - o 3M Business Conduct Compliance at 1-877-3M-ETHICS in the U.S. or 3M-Ethics.com (for web reporting or worldwide telephone reporting)
 - o The 3M Director, Business Conduct and Compliance
 - o The assigned 3M legal counsel for Information Technology

What it means for confidential information of others

- As we do not disclose 3M confidential information without a proper confidential disclosure agreement, do not accept another party's confidential information without a written, signed confidential disclosure agreement. These confidential disclosure agreements must be signed by a general manager or higher level executive.
- Unless you have another party's permission to use the party's information, make sure you can answer "no" to each of these questions before using the information:
 - o Is the information actually confidential information?
 - o Was the information obtained illegally or unethically?
 - o Would using the information violate any other business conduct policy?
- Contact your assigned 3M legal counsel before hiring or using a consultant or agent to obtain information for 3M or if you learn that an improper disclosure or improper use of another party's confidential information may have occurred.
- Do not interview or hire employees or consultants of competitors without first contacting your assigned legal counsel.

What to Avoid

- Sharing 3M confidential information with friends or family.
- Talking about 3M confidential information in public places, such as elevators, airplanes or restaurants, where you can be overheard.
- Leaving 3M confidential information unattended on your desk, within 3M facilities, in public areas, etc.
- Disclosing 3M confidential information to anyone outside 3M who does not have a confidential disclosure agreement protecting that information, or to anyone inside 3M who does not have a need to know the information.
- Divulging information about a new product or service before any necessary patent applications have been filed.
- Receiving confidential information from an employee about his or

her former employer.

- Using third party confidential information that has been obtained illegally or unethically.

**Related
Information**

- Frequently Asked Questions About Protecting 3M Confidential Information
- Frequently Asked Questions About Respecting the Confidential Information of Others
- Data Classification Policy
- Corporate Intellectual Property Policy
- Corporate Records and Information Management Policy
- Information Security Manual

**Further
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**Geographic
Relevancy** Worldwide

Internal Controls, Financial Reporting, Document Retention and Auditing Policy

Applies To	All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.
Policy Statement	3M management is responsible for the preparation of complete and accurate annual and quarterly consolidated financial statements in accordance with generally accepted accounting principles and for maintaining appropriate accounting and financial reporting principles and policies and internal controls designed to assure compliance with accounting standards, laws and regulations. It is 3M policy that employees and others acting on 3M's behalf have a responsibility for the accuracy, thoroughness and timeliness of actual and forecasted financial information and for compliance with 3M's internal controls over financial reporting, disclosure controls and procedures, document retention and auditing policies. We ensure compliance with these policies through our internal and independent auditors, and by monitoring the integrity of our financial management and reporting systems.
Additional Elements	What it means Internal controls ➤ Maintain and enter complete, accurate, and timely records and accounts for all business transactions, corporate assets and funds, and corporate liabilities. ➤ If you seek approval for expenditures from your supervisor, only do so for legitimate purposes and be sure to supply all pertinent and accurate documentation. ➤ If you have the authority to approve expenditures, be sure to exercise your authority only after considering whether the expenditure satisfies corporate policies. Take your approval authority seriously. You may be allowed to delegate it in some circumstances, but you retain ultimate responsibility for the use of your delegated authority. The delegation must be accompanied by clear instructions and ongoing oversight. ➤ Follow disclosure controls and procedures to ensure that important information is recorded, processed, summarized and communicated to the appropriate employees in St. Paul in Corporate Accounting and/or Corporate Auditing so that an assessment can be made of

the need to disclose developments, risks and other material information that pertains to 3M's businesses.

- Use corporate resources effectively and efficiently.
- Safeguard all physical, financial, informational and other company assets.
- Seek reimbursement only for expenses incurred for 3M's benefit.

Financial reporting

- Provide full, fair, accurate, timely and understandable financial and other information in internal reports and in any communication that you know may be relied upon in news releases or documents filed with or submitted to the Securities and Exchange Commission, any other government agency or self-regulatory organization.
- Book revenue and expenses in the appropriate accounting period, using accruals as necessary.

Document retention

- Retain records, e-mails and other documents and electronic files in accordance with 3M's *Records Retention Policy* or applicable law, whichever calls for a longer retention period. If you are aware that any legal proceeding involving the company is threatened or has begun, immediately take steps to preserve all potentially pertinent records and files and promptly contact your assigned 3M legal counsel.

Cooperation with internal and outside auditors

- Cooperate fully and provide full and complete information to 3M internal auditors and 3M's independent certified public accountants.

Audit Committee process for handling complaints about accounting or auditing matters

- The Audit Committee has established a process for the receipt, retention and treatment of complaints regarding accounting, internal accounting controls, financial reporting and auditing matters, including the confidential, anonymous submission of such complaints. You may report such complaints, anonymously if you wish, by calling 1-800-243-0857 or by writing the 3M General Auditor, 3M Corporate Auditing Department, 3M Center 224-06-

N-11, St. Paul, MN 55144-1000. You may also report a complaint by going to 3M-ethics.com. You may remain anonymous if you choose. You can learn more about anonymous reporting options in the *What If You Wish to Remain Anonymous* subsection in the “If You Have a Business Conduct Concern” subsection of this website/manual. All complaints reported will be investigated, and appropriate corrective action will be taken when warranted.

- 3M prohibits retaliation against anyone who raises a business conduct concern in good faith or cooperates in a company investigation.

What to avoid

- Using 3M funds or property for any unlawful, improper or unethical purpose.
- Financial reporting that is inconsistent with actual performance.
- Inaccurate financial records, such as overstated travel and living expense reports, or erroneous time sheets or invoices.
- Failure to follow 3M’s revenue recognition requirements.
- Circumventing review and approval procedures.
- Describing an expenditure for one purpose when, in fact, it is being made for something else.

Related Information

- If You Have a Business Conduct Concern
- Frequently Asked Questions

For Further Information

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Worldwide

Securities Trading and Insider Information Policy

Applies To	All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.
Policy Statement	It is 3M policy that employees and others acting on 3M's behalf must not disclose material, non-public information, or, while knowing material, non-public information about 3M or another company, purchase or sell securities (e.g., stock, bonds or options) of 3M or the other company. In addition, senior 3M executives must strictly comply with Securities and Exchange Commission rules restricting their ability to trade in 3M securities.

Additional Elements

What it means

- Generally, any information that an investor might use to decide whether to buy, sell or hold securities is material information. This includes:
 - Company or business unit financial results.
 - Earnings per share.
 - Any change in the payment of dividends.
 - Possible mergers, acquisitions, divestitures or joint ventures.
 - Major litigation.
 - Significant product development.
- Information is non-public until it has been disclosed to the investing public through established news services, such as Dow Jones News Services, and sufficient time has passed to allow the information to be disseminated through the trading markets, typically 48 hours after the release of the information.
- Violations of this policy could also lead to fines and criminal penalties against individual securities traders and the company.

What to avoid

- Buying or selling stock or other securities of any company while you are in possession of material, non-public information concerning that company.
- Disclosing material, non-public information about a company to any other person, including family members, friends or colleagues, where the information may be used by the other person to profit by

trading in the company's securities.

- Recommending or suggesting that anyone else buy, sell or retain the stock or other securities of any company while you have material, non-public information about the company.
- Providing access to material non-public information when it does not meet the strict need-to-know requirement.

**Related
Information**

Frequently Asked Questions

**For Further
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Worldwide



Respecting Each Other and Our Communities

One of 3M's core values is to respect our social and physical environment. We are committed to the goal of sustainable development through environmental protection, social responsibility and economic progress. For us, sustainability means meeting the needs of customers, employees and communities today, while ensuring that resources will be available for future generations to meet their needs. We recognize that the company's long-term success springs from our strategies for continuous progress on environmental, health and safety concerns. We also strive to attract and retain a diverse and talented work force in a company where initiative is rewarded, privacy is respected, employee health and safety is safeguarded and innovation is a way of life.

3M's principles of respect for community and each other are based in the following policies:

- Advertising and Product Representation
- Environmental, Health and Safety
- Harassment
- Privacy

Advertising and Product Representation Policy

Applies To All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.

Policy Statement 3M's reputation as a responsible company extends to the products and services we offer and how we represent them. It is 3M policy to represent our products truthfully, fairly and in good taste in all sales, advertising, packaging and promotional efforts. Management of every 3M business unit is responsible for having a process to ensure appropriate review of advertising and claims about its products and services.

Additional Elements

What it means

- Represent 3M products and services truthfully, fairly and in good taste.
- Substantiate claims, as appropriate, through testing based on sound statistical and scientific principles.
- Apply this policy to all claims, express or implied, in advertising, which includes product literature, labels, advertising copy, environmental claims, customer surveys and certifications, promotional materials, technical data sheets, user and maintenance manuals, videotapes, Internet sites and the like.
- Follow the procedures required by the 3M Office of General Counsel for review and approval of advertising. Often, these procedures will require written approval from marketing, laboratory, technical service, clinical, quality, product responsibility, regulatory and toxicology, followed by the Office of General Counsel.

What to avoid

- Advertising or claims not consistent with 3M's corporate values.
- Deceptive acts or practices and other unfair methods of competition.
- False or deceptive statements about 3M products or services.
- False or deceptive comparison of products or services.
- Disparaging a competitor or its products or services.

- Making claims about products or services without data to substantiate the claims.
- Misrepresenting the quality or effectiveness of a product or service.
- Passing off one's products or services as those of another, such as by simulating a competitor's packaging or trademarks.

Related Information

Frequently Asked Questions

For Further Information

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Environmental, Health and Safety Policies

Applies To All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.

Policy Statement 3M is committed to meeting our environmental, health and safety (EHS) goals for 3M products and processes, and to maintaining a safe and healthy workplace. It is 3M policy to provide a safe and healthful workplace for all, and to minimize the impact of our production processes and products on the environment.

Employees and others acting on 3M's behalf are responsible for knowing and complying with all applicable EHS laws and regulations, as well as with 3M's related policies, standards and guidelines. 3M management also is responsible for ensuring that employees and others acting on 3M's behalf are properly trained in these laws and policies. Professionals in all areas of EHS relating to products, operations and workplace safety are available to assist in these matters.

Additional Elements

What it means

- Comply with all relevant EHS laws and regulations, and 3M EHS policies.
- Use *3M's New Product Introduction Framework* to ensure new product designs are safe and environmentally responsible.
- Incorporate appropriate safety and health considerations into your daily job duties and business decisions.
- Operate and maintain equipment, facilities and processes in a safe manner.
- Participate in training and education programs to manage health and safety risks, both on and off the job.
- Communicate with management and coworkers about working conditions perceived to be unsafe or hazardous and, as appropriate, shut down any operation that is operating in an unsafe condition.
- Respond to environmental, health or safety concerns raised by fellow employees, customers or neighbors associated with our operations or products.
- Prevent pollution at the source wherever and whenever possible.

- Develop products that will have minimum effect on the environment.
- Conserve natural resources through the use of reclamation and other appropriate methods.
- Work to improve energy efficiency in existing operations and in new equipment and facilities.

What to avoid

- Failure to comply with environmental, health or safety regulations and 3M policies.
- Unreported environmental hazards or accidents.
- Missed opportunities for preventing pollution and reducing waste.
- Missed opportunities to improve energy efficiency.
- Unsafe activities and workplace conditions.
- Suppliers, outsource manufacturers and service providers who do not share 3M's environmental, health and safety values.

For Further Information

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 Worldwide

Harassment Policy

Applies To All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.

Policy Statement It is 3M policy that employees and others acting on 3M's behalf are entitled to respectful treatment in the 3M workplace. Being respected means being treated honestly and professionally, with your unique talents and perspectives valued. A respectful workplace is about more than compliance with the law. It is a working environment that is free of inappropriate behavior of all kinds and harassment because of age, disability, marital status, race or color, national origin, religion, sex or sexual orientation.

This policy applies to all 3M employees worldwide and to anyone doing business for or with 3M. As a global policy, it applies to all locations and situations where 3M business is conducted and to all company-sponsored social events.

Additional Elements

What it means

A respectful workplace

3M is committed to providing a workplace in which the dignity of every individual is respected. Each of us should understand that incidents of harassment and inappropriate behavior will not be tolerated at 3M.

Harassment

Harassment is unwelcome conduct toward an individual because of his or her age, disability, marital status, national origin, race or color, religion, sex or sexual orientation, when the conduct creates an intimidating, hostile or offensive work environment that:

- Causes work performance to suffer; or
- Negatively affects job opportunities.

Harassment is against the law in the United States and many other countries. Examples of harassment that may violate the law and will violate this policy include:

- Oral or written communications that contain offensive name-calling, jokes, slurs, negative stereotyping, or threats. This includes comments or jokes that are distasteful or targeted at individuals or

groups based on age, disability, marital status, national origin, race or color, religion, sex or sexual orientation.

- Nonverbal conduct, such as staring, leering and giving inappropriate gifts.
- Physical conduct, such as assault or unwanted touching.
- Visual images, such as derogatory or offensive pictures, cartoons, drawings or gestures. Such prohibited images include those in hard copy or electronic form.

Sexual harassment

Sexual harassment is a form of harassment that is based on a person's sex or that is sex-based behavior. It is also sexual harassment for anyone in a position of authority to tie hiring, promotion, termination or other any condition of employment to a request or demand for sexual favors. Although having a consensual romantic relationship with another 3M employee is not harassment, harassment may occur as a result of the relationship if either person in the relationship engages in conduct in the workplace that is inappropriate or unwelcome. Employees in consensual romantic relationships also must comply with the *3M Conflict of Interest Policy*.

Inappropriate behavior

Our goal is to have a work environment where we all treat each other respectfully and professionally. Any unprofessional or disrespectful behavior, even if not illegal, interferes with that goal and will not be tolerated. 3M reserves the right to respond to inappropriate behavior even where no one has complained or indicated they have been offended.

Performance feedback is not harassment or inappropriate behavior

Effective leadership requires that managers talk with their employees about their job performance. Managers should be clear about how each employee is performing and how the employee's overall behavior contributes to the workgroup's ability to deliver results consistent with 3M's values. Such discussions may be difficult and they always should be done professionally and respectfully. However, constructive criticism and supervisory actions regarding performance deficiencies or other workplace issues are not harassment or retaliation.

Every 3M employee has a role to play in achieving a respectful workplace

- 3M expects respectful and professional behavior at all times, no matter the situation. Remember that your actions reflect upon you, and potentially reflect upon 3M. Be sensitive to how others may perceive your actions. Just because someone does not complain to you does not mean that they do not object to your behavior.
- There is no reason to ever engage in unwelcome behavior that has the purpose or effect of harassing others. Report any unwelcome behavior you think might be harassment under this policy.
- Be open to constructive feedback regarding performance deficiencies. Recognize that respectful supervisory actions regarding workplace issues are a necessary and appropriate step in performance feedback.
- If someone offends you, let that person know so that it won't happen again. If you have offended someone, understand his or her perspective, apologize and do not let it happen again.
- If you are aware of any behavior that might violate this policy, report it to your manager or supervisor or to the 3M Human Resources Department.

What to avoid

- Any behavior that is unprofessional or disrespectful, or that has the purpose or effect of harassing anyone.
- Any retaliation against someone who raises a concern or potential violation under this policy.
- Missed opportunities to respectfully communicate to someone that you found his or her behavior offensive.
- Unreported concerns or violations of this policy.

How to report a violation

Most reports of suspected violations of this policy are made to 3M Human Resources. You can contact your local Human Resources Manager, or go to someone higher in the Human Resources organization. You can also use any of the additional reporting options listed in the *If You Have a Business Conduct Concern* section of this website/manual, if you prefer.

How 3M will respond

Investigation and response

If you report a complaint of harassment or inappropriate behavior, 3M will investigate your concerns. Where there has been a violation of policy, 3M will take appropriate action to try to avoid future violations. In appropriate cases, 3M may take disciplinary action (up to and including immediate termination) against those violating the *3M Harassment Policy*.

3M will inform parties about the status of reviewing their complaints. To respect the privacy and confidentiality of all people involved, 3M may not share specific details of the discipline or other action taken.

3M management responsibility

Every 3M supervisor and manager is responsible for ensuring that 3M provides a workplace free of harassment and inappropriate behavior and that complaints are handled promptly and effectively. With the assistance of Human Resources, 3M management must inform their organizations about the policy, promptly investigate allegations of harassment, take appropriate disciplinary action, and take steps to assure retaliation is prohibited.

Retaliation is prohibited

This policy strictly prohibits any retaliation against an employee or other person who reports a concern in good faith about harassment or other inappropriate behavior.

Related Information

Frequently Asked Questions
3M Conflict of Interest Policy
3M Electronic Resources Policy
3M Electronic Resources Standards

For Further Information

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Approved By

Business Conduct Committee

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Privacy Policy

Applies To	All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.
Policy Statement	It is 3M policy to comply with all applicable privacy and data protection laws. This commitment reflects the value we place on earning and keeping the trust of our employees, customers, business partners and others who share their personal information with us.
Additional Elements	What it means 3M will adhere to the following guidelines to the extent required by applicable laws: ➤ Limitations on the collection, use and disclosure of personal information. • Notice – 3M will provide timely and appropriate notice to individuals about its data collection practices. • Consent – 3M will collect, use, disclose and transfer personal information only with the individual's consent, which may be express or implied, depending on the sensitivity of the personal information, the individual's reasonable expectations and legal requirements. • Purpose limitation – 3M will collect personal information only for specific, limited purposes. The information we collect will be relevant, adequate and not excessive for the purposes for which it is collected. 3M will not process personal information in a manner inconsistent with the purposes for which it was originally collected, unless the individual has subsequently consented to the new use of their personal information. • Direct marketing - 3M will not use personal information for direct marketing purposes without giving the individual an opportunity to "opt-out." • Transfers to third parties and other countries - 3M will take appropriate measures, by contract or otherwise, to provide adequate protection for personal information that is disclosed to a third party or transferred to another country,

including transfers within 3M.

- Management of personal information.
 - Quality - 3M will take commercially reasonable steps to ensure that personal information is reliable for its intended use, accurate, complete, and, where necessary, kept up-to-date.
 - Access - 3M will maintain procedures to give individuals reasonable access to their personal information and, when appropriate, the ability to correct or delete inaccurate or incomplete information.
 - Security - 3M will take commercially reasonable measures to protect personal information from loss, misuse, unauthorized access or disclosure, alteration and destruction.
 - Retention - 3M will not keep personal information for longer than necessary or permitted by law.
- Accountability and enforcement.
 - Accountability - 3M will designate individuals within the company to be accountable for compliance with laws and related 3M policies.
 - Enforcement - 3M will provide internal controls for verifying compliance with laws and related 3M policies and procedures.
 - Complaint process - 3M will provide a fair process for investigating and resolving complaints and communicate the process to the individuals.

What to avoid

Do not engage in any of the following practices, unless you first consult with assigned 3M legal counsel to confirm your approach is permitted by applicable law:

- Collecting, using or disclosing personal information without the knowledge and consent of the individual.
- Disclosing personal information about 3M employees, customers and business partners to third parties.
- Transferring personal information from one country to another,

even among 3M affiliates.

Related Information	Frequently Asked Questions
For Further Information	John M. Stoxen Director, Business Conduct and Compliance jmstoxen@mmm.com or Gwen N. Schwebel Sr. Paralegal II gnschwebel@mmm.com
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Geographic Relevancy	Worldwide



Operating in a Global Marketplace

3M is a global company, with suppliers, customers and competitors in every country in which we do business. Each of those many countries has laws that regulate how we interact with those groups as we conduct business. Because 3M is a U.S. company, many U.S. laws apply to our business operations around the world. At the same time, 3M is subject to laws in the various countries in which we do business. It is vitally important that we comply with all applicable laws and regulations that affect our global business operations. You should seek guidance from your assigned 3M legal counsel whenever you are unsure of your obligations in these complex areas.

3M's policies to help us conduct business the right way, everywhere in the world include:

- Anti-Bribery
- Antitrust and Competition Law
- Export, Import and Trade Compliance

Anti-Bribery Policy

Applies To All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.

Introduction Certain activities related to Governmental Officials (defined below) – such as providing gifts, political contributions, entertainment, travel-related benefits or facilitating payments - can violate anti-bribery laws around the world. 3M may also be liable under some circumstances for the bribes or attempted bribes made or offered by the consultants, sales agents and certain business partners with whom 3M does business. 3M may also be liable for the prior acts and omissions of businesses that 3M acquires or with which it enters into joint ventures.

This policy prohibits bribery and imposes mandatory due diligence, internal approvals, books and records entries, and document retention requirements in six key areas related to Government Officials. It also requires audits to help ensure compliance, as well as appropriate scrutiny of acquisition and joint venture target companies that have had foreign government sales and other significant governmental interaction. (Receiving or offering gifts, travel or anything of value to a third parties who are not Government Officials must comply with the Business Gifts and Entertainment Policy.)

A “Government Official” is:

- any government employee or elected or appointed official
- a political party
- a candidate for political office (even if not currently in office)
- an official or employee of an international organization such as the United Nations, Red Cross/Red Crescent, International Monetary Fund, World Bank.
- an employee of a quasi-public agency and other companies or organizations partly or wholly owned or controlled by a government.

A “bribe” is the offering, authorizing or giving of anything of value to a Government Official directly or indirectly with the intent to obtain or retain business or gain an improper advantage. An “improper advantage” is broadly defined to mean something to which the

company is not clearly entitled, such as a price increase approval, favorable product specification selection, contract award, grant of operating permits, product use/registration approval, favorable court decision, or tax dispute settlement.

**Policy
Statement**

It is 3M policy to comply with all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and all applicable local laws where 3M operates, and to accurately reflect all transactions on 3M's books and records. It is also 3M's policy to require those agents, consultants and business partners who work on 3M's behalf before Government Officials to comply with these same laws and practices.

**Additional
Elements**

What it means

3M requires that:

- Its employees not engage in acts or omissions that offer, authorize or give a bribe to a Government Official, or create the impression that a bribe has been offered, authorized or given;
- Its employees take affirmative steps to prevent those doing business directly or indirectly before a Government Official on 3M's behalf from engaging in bribery;
- Its employees adhere to 3M's mandatory due diligence, internal approval, financial reporting, and document retention requirements in the six key areas listed below and as fully set out under the topic "Anti-Bribery" on 3M's Legal Center.
- Its employees scrutinize activities of certain acquisition targets and joint venture partners to identify and address potential bribery issues;
- Its employees promptly report to 3M any suspected violations by 3M employees or others doing business before a Government Official on 3M's behalf; and
- Its auditing function audit 3M's businesses as appropriate for potential bribery activities and risks.

Six Key Areas

In addition to those obligations set forth above, 3M requires specific due diligence, internal legal and business approvals, financial reporting, and document retention requirements in six key areas:

1. 3M sponsorship of any travel-related benefits for any Government Official
2. Gifts to, entertainment for, or charitable contributions on behalf of any Government Official
3. Use of consultants and sales agents who may interact with Government Officials on 3M's behalf
4. Facilitating or "grease" payments to any Government Official
5. Activities with certain business partners who may interact with Government Officials directly or indirectly on 3M's behalf
6. Political contributions to any Government Official, political party, candidate or political organization

3M employees can access these Mandatory Operational Standards and related tools on the 3M Legal Center Intranet site, under the topic "Anti-Bribery".

What to avoid

- The direct or indirect provision of cash or anything of value to a Government Official to obtain an unfair business advantage or to obtain or retain business.
- Authorizing or providing travel benefits, gifts, entertainment, or political contributions for the benefit of a Government Official without the required due diligence assessment and internal 3M business and legal approvals.
- Entering into a consultant or sales agent agreement that will result in contacts with Government Officials without conducting due diligence, obtaining the required internal business and legal approvals, retaining all due diligence for eight years, and accurately recording on 3M's book and records all related payments.
- Making any "grease" or facilitating payments without obtaining the required 3M internal business and legal approvals.
- Making any incomplete, false or inaccurate entries on 3M's

books and records.

**Related
Information**

- 3M Legal Center (“Anti-Bribery” topic) - contains all mandatory tools and compliance information :
- Mandatory “Operational Standards” for each of the 6 key areas
- “Process Flow Charts” for each of the 6 key areas
- Frequently Asked Questions
- Due Diligence Checklists for 6 Key Areas
- List of Red Flags
- 3M Legal Compliance Course
- PowerPoint Training Program

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Antitrust and Competition Law Policy

Applies To	All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.
Policy Statement	It is 3M policy to engage in fair competition, in compliance with antitrust and competition laws globally. Because antitrust and competition laws are not identical in every country, it is important that 3M employees consult their assigned 3M legal counsel whenever their business activities might be regulated by these laws. Failure to comply with these laws could lead to criminal and civil penalties, significant business disruptions and harm to 3M's reputation.

Additional Elements

What it means

- Most antitrust and competition laws restrict certain activities with 3M customers and competitors. Consult with your 3M legal counsel before pursuing any business arrangements that could raise antitrust or competition law issues, including:
 - Exclusive sale or purchase arrangements.
 - Selective discounting.
 - Bundling of goods or services.
 - Restrictions on resellers.
 - Technology licensing agreements that place restrictions on the licensee or licensor.
 - Any business discussions or agreements with competitors.
 - Activities designed to gain or maintain a dominant market position.
- The application of these restrictions is very complex. Consult with your assigned 3M legal counsel early, as you begin considering any of these arrangements. Any proposed discussions with competitors must be reviewed with assigned 3M legal counsel in advance.

What to avoid

Antitrust and competition laws generally prohibit certain activities, such as:

- Reaching an understanding or agreement with a competitor to restrain trade, for example, by fixing prices, allocating customers or coordinating bidding activities.

- Reaching an understanding or agreement with other companies that requires 3M not to do business with another company, for example, an agreement with major distributors not to do business with a discounting distributor.
- Reaching an understanding or agreement that fixes the prices at which our distributors resell products.
- Abusing a large market-share position by engaging in below-cost pricing in order to harm competitors.

Related Information

Frequently Asked Questions

For Further Information

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Worldwide

Export, Import and Trade Compliance Policy

Applies To 3M employees worldwide, anyone doing business for or with 3M and others acting on 3M's behalf. As a global policy, it applies to all locations and situations where 3M business is conducted and to all company-sponsored events.

Policy Statement It is 3M policy to comply with all applicable export, import and trade compliance laws in all countries in which 3M does business.

Additional Elements **What it means**

Trade Control Laws Generally

- Follow all applicable trade control laws and regulations of all countries in which you conduct business.
- Follow 3M trade compliance policies and standards, and engage the 3M Trade Compliance Department and 3M International Business Development Department as directed by those standards.
- 3M's Trade Compliance Department in St. Paul, after review by 3M's Office of General Counsel in St. Paul, must assess and submit any trade compliance-related disclosures to the U.S. Government or any government entity located in the United States. Contact your assigned 3M counsel to discuss any matter of concern and relay appropriate issues to 3M's Trade Compliance Department in St. Paul or Office of General Counsel in St. Paul.

Export Control Laws

- Comply with all applicable U.S. export control laws and those of the countries in which you do business.
- Consult with 3M's Trade Compliance Department in St. Paul and your assigned 3M legal counsel about export control laws in your country, as well as applicable U.S. export control laws, that may control not only the export of products, technology, services, software, spare parts and equipment physically across borders, but also (i) the sharing of export-controlled technology, services, and equipment within your country to those who are not citizens of your country, and (ii) the reexport from your country of export-controlled items, technology or services.

- With respect to doing business of any kind with or related to countries subject to embargos or other comprehensive trade sanctions under 3M's trade compliance policies, 3M's businesses must obtain prior legal review and business executive review before commencing any business activity in those countries or with government officials/interests/citizens of those countries .
- Comply with the export control plans established by your division, laboratory, staff group or subsidiary.
- Only 3M's Trade Compliance Department in St. Paul and those it expressly designates are authorized by 3M to apply to the U.S. Government for U.S. export control authorization, including U.S. export control licenses and re-export authorization. Contact 3M's Trade Compliance Department in St. Paul to discuss your requirements or concerns.
- If you are granted an export license, work with 3M's Trade Compliance Department to develop an effective control plan for adhering to license restrictions and reporting requirements.

Importation, Country of Origin and Marking Laws

- Follow all applicable U.S. and local country Customs and import laws and regulations, including those requiring accurate documentation, country of origin markings, classification of the goods, and proper valuation declarations, including those of non-cash value (such as tooling and components).
- Seek the advice and guidance of your local assigned import manager or 3M's Trade Compliance Department in St. Paul when participating in any special duty reduction programs, such as those under free trade agreements (NAFTA, CAFTA, etc.), bonded warehouses, temporary importations under bond, bonded books, duty drawback, etc.
- Direct all correspondence with local Customs authorities through your local 3M import manager or 3M's Trade Compliance Department in St. Paul.

Anti-Boycott Laws

- Never cooperate with any restrictive trade practice or boycott that is prohibited by U.S. or applicable local laws. An "illegal boycott request" under U.S. law is any request from a third

party to take any of the following described actions against countries friendly to the U.S., including but not limited to Israel:

- Refusal to do business with or in Israel, or with other persons or entities that do business in or with Israel, or other countries friendly to the U.S.;
 - Furnishing information about business relationships with or in Israel;
 - Discriminating against someone based on race, religion, sex, national origin except in cases where such information is related to valid government documents such as visas; or
 - Executing business documents such as contracts, letters of credit, warranties that contain illegal boycott requests (such as prohibiting Israeli product content, product delivery through Israel, Israeli business dealings, etc.).
- To comply with U.S.-required boycott reporting regulations, all boycott requests received by 3M must be immediately reported to your company's assigned export control/anti-boycott coordinator or to 3M's Trade Compliance Department in St. Paul.

What to avoid

- Providing any certifications or representations of the country of origin of a product without prior written approval from 3M's Trade Compliance Department.
- Transferring any export-controlled items or technology or services without the required export authorization.
- Approving or making any U.S. export control representations or certifications in any type of agreement or other document without prior review of 3M's Office of General Counsel in St. Paul.
- Providing inaccurate, incomplete or unsubstantiated invoice or import documentation, including those related to product description, classification, valuation, country of origin or quantity.
- Completing Free Trade Agreement Country of Origin certifications without proper back up documentation and complete analysis.

- Not reporting amendments to Customs declarations for pricing adjustments, indirect payments, or credits received.
- Storing export-controlled technology on electronic databases or in other locations without access controls.

Related Information

- 3M Legal Center (click on “Business Across Borders”)
- 3M Trade Compliance Department
- Country of Origin broad awareness training
- Division Country of Origin Coordinators and Product Marking Liaisons
- List of 3M international companies’ assigned Export Control/Boycott Coordinators
- Your assigned 3M counsel or 3M Area Legal Director
- 3M Central Compliance Department
- 3M Office of General Counsel (OGC) Export Lawyer
- 3M OGC Import lawyer
- 3M Lawyers Designated to Review U.S. Embargo Issues

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Geographic Relevancy Worldwide



Dealing with Governments

Many 3M business units do business with one or more governmental bodies. This may include business with federal, state or local authorities, or with government prime contractors or subcontractors in the United States, or with national or local government agencies or government prime contractors or subcontractors outside the United States. Many laws and regulations apply in these situations. 3M is committed to being a responsible company with uncompromising integrity in all its dealings with local, state/provincial and national governments, and their prime contractors and subcontractors around the world. Before beginning to work with these entities, those acting on 3M's behalf must understand the rules that apply to working and interacting with governments and government officials.

3M policies that detail ways in which we interact with governments are summarized in this section:

- Doing Business with Government Agencies and Government Contractors
- Hiring of Former and Current Government Employees and Consultants
- Lobbying
- Political Activities

Doing Business with Government Agencies and Government Contractors Policy

Applies To All 3M employees worldwide and others acting on 3M’s behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.

Policy Statement It is 3M policy in the course of our government dealings to comply with all applicable national, state, province or local laws and regulations. In the United States, the publication “*Business Conduct Policy Applicable to U.S. Government Contracts and Subcontracts*” provides direction to 3M employees involved in business dealings with U.S. government agencies and with companies that have contracts with such agencies. If you plan to participate in government business in the United States, you should obtain a copy of this publication from your assigned 3M legal counsel.

Additional Elements

What it means

- Understand and abide by *3M’s Business Gifts and Entertainment Policy* regarding gifts to U.S. and international government employees.
- Follow contract negotiation requirements, such as special bidding rules and the prohibition against obtaining “inside information” about the procurement.
- Set up processes to abide by contract obligations and inform other employees who have responsibility for contract performance regarding special pricing, intellectual property rights, subcontracting requirements and other special requirements.
- Be honest and accurate in all dealings with government officials and agencies. Ensure that certifications are accurately made.
- Be aware that applicable laws and regulations may vary from state to state and country to country. Seek advice from your assigned 3M legal counsel before proceeding. Also, understand and follow *3M’s Transacting International Business Policy*.
- Obtain prior clearance to discuss or offer employment to former and current government employees, as detailed in *3M’s Hiring Former and Current Government Employees and Consultants Policy*.

What to avoid

- Violating national or local government laws or regulations concerning gifts and gratuities to government employees.
- Making false statements or certifying false data to government employees or agencies.
- Deviating from contract requirements or making unauthorized contract substitutions, including failure to perform required tests and inspections.

Related Information

- Transacting International Business Policy
- Hiring Former and Current Government Employees and Consultants Policy
- 3M Business Gifts and Entertainment Policy
- Government Contract Compliance Policy

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Hiring Former and Current Government Employees and Consultants Policy

Applies To All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.

Policy Statement It is 3M policy to comply with all laws concerning the recruitment and employment of former and current government employees, either as employees or consultants. 3M employees must obtain prior clearance to discuss or offer employment to or consulting by former or current government employees.

In the United States, these laws and regulations vary according to the employment status of U.S. government employees (whether active or retired), the functions they performed, their business relationships with 3M when they were government employees, and how long it has been since they left government employment. Each situation must be considered on a case-by-case basis. Many other countries also have laws that regulate the hiring, as employees or consultants, of former or current government employees.

Additional Elements

What it means

- Obtain prior clearance from 3M Human Resources before discussing possible 3M consulting or employment, or making offers to hire:
 - Any current or former U.S. government employee (military or civilian) or federal legislator.
 - Any current state or local government employees, legislators or members of their immediate families who could direct or influence (a) the regulatory or contractual treatment of 3M in any pending matter, or (b) the purchase of 3M goods or services by state or local government agencies, or (c) the enforcement of state or local government laws affecting 3M in any pending matter.
 - Any current or former state or local government employees or legislators (or members of their immediate families) who are not currently, but have been within the last two years, in positions where they could direct or influence either the purchase of 3M goods or services by state or local government agencies or the adoption or enforcement of state or local government laws affecting 3M in any pending matter.

- Postpone any discussions about possible 3M employment or consultant relationships that are initiated by current or former international, U.S., state or local government employees or legislators until it is determined that such discussions are legally permitted.
- Former international or U.S. Government employees or legislators who become 3M employees or consultants must follow all government conflict of interest (“revolving door”) laws applicable as a result of their former government employment. Generally speaking, this means that they must avoid involvement with any 3M matter in which they were significantly involved while employed by the government.
- Many countries outside the U.S. have laws regulating the hiring, as employees or consultants, of former or current government employees. Assigned 3M legal counsel must be consulted prior to contacting former or current government employees regarding employment as 3M employees or consultants.

What to avoid

- Employment discussions with former or current international, U.S., state or local government employees, legislators, or members of their immediate families, whether initiated by you or them, unless you have approval from 3M Human Resources, after its consultation with assigned 3M legal counsel.

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Lobbying Policy

Applies To	All 3M employees worldwide and others acting on 3M's behalf. This policy applies to all locations where 3M business is conducted, as well as to company-sponsored events.
Policy Statement	Lobbying is a normal, acceptable and useful part of the legislative process, provided it is conducted in compliance with all applicable legal requirements. Proper lobbying activities can educate lawmakers about 3M's legitimate interests. Laws and regulations governing lobbying or attempts to influence government officials vary around the world. It is 3M policy to strictly comply with all lobbying laws and regulations wherever 3M does business.
Additional Elements	What it means ➤ In the United States, 3M employees or others acting on 3M's behalf who contact federal, state or local government officials or employees to influence legislation or regulations may be engaged in regulated lobbying activities. Check with your assigned 3M legal counsel to determine whether a potential contact with government personnel constitutes lobbying, unless your contact has been suggested in an authorized 3M publication, such as <i>Government Compass</i>. ➤ Follow the procedures established by the 3M Office of General Counsel, Accounts Payable and the Tax Department to comply with federal, state and local laws pertaining to registration and reporting of lobbying efforts. ➤ Coordinate all contacts with government elected officials and government personnel (and contracts for lobbying consultants) on behalf of 3M with <i>Corporate Public Affairs</i>. ➤ Because of 3M's prominence and the expertise of its employees, 3M employees are often asked to appear before government bodies in the United States and around the world. 3M recognizes that such testimony is part of being a good corporate citizen, and the company believes such appearances provide an opportunity to enhance its reputation and influence the development of public policy. The decision to accept, or not accept, an opportunity to testify requires careful thought, planning and coordination with <i>Corporate Public Affairs</i>. For more details, see 3M's "<i>Global Guidelines for Government Testimony</i>." ➤ Lobbying laws do not apply to individual political expression that is not on behalf of 3M. You can work to influence legislative bodies relating to issues of personal concern. Just make sure you don't

mention 3M or use any company resources (letterhead, e-mail accounts, etc.) that might give the appearance you are acting on 3M's behalf.

What to avoid

- Discussions on 3M's behalf about legislation, rulemaking or policy development with elected officials or administrative employees, unless you are a registered lobbyist or have prior review and approval from your assigned 3M legal counsel.

Related Information

Frequently Asked Questions

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Worldwide

Political Activities Policy

Applies To 3M employees worldwide and anyone acting on 3M's behalf. As a global policy, it applies to all locations and situations where 3M business is conducted and to all company-sponsored events.

Policy Statement All employees and others acting on 3M's behalf must comply with laws that apply to the use of company resources for political purposes. Except for lawful political contributions approved by the Political Activities Oversight Committee (PAOC) and the activities described below, 3M does not allow any political campaign or partisan political activities at any 3M workplace or facility. 3M also does not permit the use of 3M resources, including computers, telephones, e-mail, or employee work time for political campaigning, fund-raising, or partisan political activities.

United States law and the law of many states generally prohibit the use of 3M resources to support or oppose candidates or political committees. Any 3M contributions (of money or other 3M resources) to political campaigns, parties, or committees are made only when permitted by law and approved by the PAOC.

To advance 3M's legislative and public policy interests, eligible 3M employees and retiree shareholders may contribute voluntarily to the 3M Political Action Committee (3M PAC). Administered by a committee of company employees, the 3M PAC makes contributions to U.S. federal and some state candidates, parties, and political committees. The 3M PAC supports Republican, Democratic, and Independent candidates and political committees. All 3M PAC contributions are approved by the PAOC. 3M does not under any circumstance require any employee to contribute to the 3M PAC.

3M employees have the right to participate individually in the political process, and to make voluntary contributions of their non-working time and personal resources to support candidates and political parties of their choice. 3M encourages employee involvement in the political process, but these activities must not in any way suggest 3M support.

Permitted Activities

This Policy does not prohibit or restrict the following lawful activities or uses of 3M resources:

- The activities of the Government Affairs organization, 3M PAC, or the Political Activities Oversight Committee or any employee advisory activities.

- 3M PAC's use of the 3M Customer Innovation Center, Washington, D.C. offices, or 3M-leased hotel facilities, as approved in advance by assigned 3M legal counsel.
- 3M communications on issues of concern to 3M or 3M employees.
- Other lawful activities or uses of 3M resources that are consistent with other 3M Business Conduct Policies and approved in advance by the Political Activities Advisory Committee (for the U.S.) and the area vice president (outside the U.S.) and assigned 3M legal counsel.

3M management may invite officeholders to visit and make non-partisan addresses to 3M employees at 3M facilities. No 3M employee is required to attend such events. 3M does not permit such addresses within 60 days of the next election in which the officeholder is a candidate.

With the prior approval of 3M management and assigned legal counsel, a candidate (including an incumbent officeholder) may be permitted to communicate personally with employees and distribute campaign literature on 3M property only if:

- Such conduct occurs outside of 3M buildings;
- No suitable public property is located reasonably close to the 3M workplace;
- 3M business and access are not disturbed;
- No employees are compelled to communicate with the candidate or participate in the activity; and
- Equal treatment is provided to opposing candidates, if requested.

Additional Elements

What it means

- Except as specifically noted, 3M does not allow use of company workplaces, equipment, or other resources for political campaign, fund-raising, or political purposes.
- 3M does not permit employee participation in political activities during paid working hours.
- In accordance with U.S. law, certain management and supervisory employees and shareholders may contribute to the 3M PAC. No

employee is required to contribute to the 3M PAC.

- You may make personal contributions of time and money to the candidates or party of your choice, as long as you do not suggest that your action constitutes 3M support.

What to avoid

- Except for the permitted activities noted, any political activities on 3M property and any involvement in political activities during paid working hours.
- Making, copying, or distributing political materials using 3M equipment or resources.
- Using 3M telephones, computer, or e-mail for political campaigning or fund-raising.
- Any coercion of any employee to contribute to 3M PAC or to make any political contribution.
- Any suggestion that a private, personal donation of time or money constitutes 3M support.
- Offending co-workers with inappropriate political messages..

Related Information

Frequently Asked Questions

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