3M Science. Applied to Life.™

Be 3M

- Be Good
- Be Honest
- Be Fair
- Be Loyal
- Be Accurate
- Be Respectful

Global Code of Conduct



Message from Bill Brown

3M's commitment to ethics and integrity is a cornerstone of our culture and helps drive excellence in everything we do.

Our customers, partners, and communities expect ethical conduct from us as a company, and, as colleagues, we should expect it from each other.

3M's Code of Conduct is designed to help employees navigate challenges and act with integrity at all times —and everyone shares responsibility for upholding our Code.

We also share responsibility for protecting 3M's reputation for ethics and integrity. If you encounter any situation that doesn't feel right or may not adhere to our Code of Conduct, please speak up to your supervisor, human resources, or the Ethics & Compliance team. If you prefer, you can also make an anonymous report through 3MEthics.com.

Thank you for helping uphold 3M's values and culture.

Bill Brown

Chairman and CEO

Code of Conduct



Be Good

Obey the law and 3M's Code of Conduct.



Be Loyal

Protect 3M's interests, assets, and information.



Be Honest

Act with honesty and integrity.



Be Accurate

Keep complete and accurate business records.



Be Fair

Play by the rules, whether working with government, customers, or suppliers.



Be Respectful

Respect one another and our social and physical environment around the world.

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Be 3M

An Introduction to Our Code

3M's Code of Conduct defines what it means to Be 3M. The Code explains 3M's expectations by summarizing the guidance provided in 3M's principles, policies, standards, and procedures which govern how we conduct ourselves everywhere, every day. The Code cannot answer every question, but it provides the tools and resources to help navigate ethical challenges.

What does it mean to Be 3M? It means acting with honesty and integrity, in the work environment and beyond. In doing so, we make a difference in the lives of our customers, using our high ethical standards to create a competitive advantage for our Company, and creating a respectful work environment for all.

Acting with Unwavering Integrity

We hold ourselves and our colleagues to the highest standards of honesty and integrity, both inside and outside of the work environment. We are truthful and transparent. We act with unwavering integrity.

Acting with unwavering integrity is one of 3M's five cultural elements which define how we behave and how we represent 3M.

- We follow the laws and regulations that apply to the work we do and where we do business, both inside and outside of the work environment.
- If the Code sets a higher standard than the law, then we follow the Code.

We all play a role in protecting 3M. We do so by creating an environment of trust and respect, and being part of the solution by speaking up when something is not right.

If you ever need assistance, contact the resources listed in the "Be Good" section.

Meet High Standards

We represent 3M in our communities and our behavior can positively or negatively impact 3M's reputation. As 3M employees, it is expected that we do not engage in conduct, inside or outside of the work environment, that could jeopardize 3M's reputation for integrity or otherwise bring reputational harm to 3M. Employees who engage in such conduct could be subject to discipline, up to and including termination.

Demonstrate High-Integrity Leadership—3M People

3M's success depends on each of us doing the right thing. No matter our job title, we are all leaders when it comes to ethics and integrity, and we must meet these important commitments:

- Know and follow the guidance set forth in our Code.
- Foster a positive, respectful work environment and a strong culture of ethics.
- Complete compliance courses and certifications on time and with truthful, accurate, complete and transparent responses.
- Report suspected violations of the law or our Code unless prohibited to do so by local law.
- Do not engage in workplace retaliation.
- Report any known or suspected retaliation.
- Provide truthful, accurate and transparent responses to investigators, auditors, and other company governance process owners.

3M People

All employees, officers, and directors, and may include non-employee third parties who act on 3M's behalf, such as sales agents, representatives, consultants, contract workers, joint venture partners, distributors, converters, and outside counsel.

Demonstrate High-Integrity Leadership—Managers and Supervisors

We all play a key role in 3M's ethical culture. But if you are a manager or supervisor, you have some additional responsibilities, including:

Manager or Supervisor—Anyone who has direct reports

- Set the tone and act as an ethical role model for everyone around you.
- Create an environment that encourages asking questions and raising concerns.
- Listen and report concerns appropriately, escalating them as needed and keeping in mind 3M's escalation requirements.
- Ensure those who report to you complete their compliance training courses and certification to the Code on time.
- Do your part to create a fair and respectful work environment.

For more information, see the following resources:

- Compliance Principle
- Employee Obligations and Reporting Principle
- Policy Central

Escalation Requirements

Some types of issues must always be escalated to another resource. If you are a manager or supervisor, be sure you understand your responsibilities in this area.



Be Good



Act with Integrity

Acting with integrity means more than just following the law. 3M People are expected to meet a higher standard, even outside of the work environment, and when the situation is complex or there is no specific policy to follow.

We are all expected to use our best judgment to make good decisions every day. When in doubt, seek guidance.

3M's Ethical Decision-Making Process

1. **Am I following 3M's values?**

   Yes **No**

2. **Would I want my coworkers, my friends, my family, or the general public to read about this?**

   Yes **No**

3. **Does this uphold 3M's reputation for conducting business ethically?**

   Yes **No**

If you answered "**yes**" to all these questions, then the decision to move forward is probably okay.

For more information, see the following resources:

- 3M Ethics & Compliance Department
- Compliance Principle
- Employee Obligations and Reporting Principle
- Ethical Business Conduct Principle

Speak Up

If you find yourself in a situation where the right course of action is not clear, remember that you are not alone. 3M provides multiple resources for advice and help when you need it. By asking questions and reporting potential problems, you are protecting 3M's reputation and helping 3M succeed.

If you see or know of any misconduct, including your own misconduct, it is 3M's expectation that you promptly report such suspected violation. To make a report, you can contact any of the following resources:

- Your manager or supervisor
- Your assigned Human Resources Manager
- 3M Legal Counsel
- 3M Ethics & Compliance (ethicsandcompliance@mmm.com)
- 3MEthics.com
- 3M Corporate Audit Department
- Audit Committee of the Board of Directors

Managers and supervisors have different reporting responsibilities. If you are a manager or supervisor, you are expected to report all suspected violations of the law or the Code to your assigned 3M Legal Counsel, 3M Ethics & Compliance, your management, or 3MEthics.com.

- 3MEthics.com

At 3MEthics.com, you may report anonymously, 24 hours a day, 7 days a week in your chosen language.

Audit Committee of the Board of Directors

3M Company, Corporate Secretary
3M Center, Building 220-9E-01
St. Paul, MN 55144-1000

Investigations

When you raise a business conduct concern, 3M takes it seriously. Our Company will thoroughly review all reports and conduct investigations as necessary—while handling your personal information discreetly. No matter his or her seniority or role in our Company, anyone who violates our Code, 3M policies, standards and procedures, or the law will be subject to discipline, up to and including termination of employment, unless prohibited by local law. We expect everyone to do business with honesty and integrity and make sure their actions align with 3M's values.

Non-Retaliation

3M does not tolerate retaliation for asking a question, making a report in **good faith**, or participating in an investigation.

Good Faith

A good faith report is one that you believe to be true and that contains all the information you have—even if it is later determined that you were mistaken.

What is retaliation?

Retaliation is any negative consequence that you experience as a result of making a report, participating in an investigation, or asking a question. This might include being inappropriately demoted, getting an unfairly negative performance evaluation, or receiving an unjustified reduction in your bonus or pay. It can also include more subtle actions, like being intentionally left out of important projects or meetings.

If you think you have experienced or witnessed retaliation, contact one of the resources listed above. By reporting retaliation, you are taking a stand for ethics and integrity in our workplace and making 3M a better place to work.

For more information, see the following resources:

- Non-Retaliation Policy
- Investigations Policy
- Investigation Standard



Be Honest

Business Courtesies

During the course of our work, we may provide or accept business gifts, entertainment, meals, or travel. Exchanging business courtesies in this manner helps us strengthen our relationships with **Business Partners** and provide them with information about 3M's products.

When working with a health care professional (HCP) or a government official, special rules apply to these relationships and you must ensure that you comply with specific policies, standards, and local laws.

Business Partner

Non-3M People who may be involved in a business arrangement, contract, or transaction with 3M to provide or purchase a product or service, such as distributors, suppliers, customers, health care professionals (HCPs), sales agents, representatives, consultants, contract workers, joint venture partners, and outside counsel.

When offering or accepting business courtesies, there are several factors we need to keep in mind.

Value

Business courtesies should be of modest value, such as a 3M-branded product or a reasonable meal. We should never offer or accept anything that we—or anyone else—could consider to be extravagant.

Frequency

The exchange of business courtesies should be infrequent. Offering or accepting gifts, entertainment, meals, or business travel too often could make it appear that the business relationship is not completely impartial.

Timing

To ensure that all our business dealings are honest and unbiased, we must consider the timing of contract renewals and other significant decisions when offering or accepting business courtesies. Avoid the appearance that any business courtesy is an attempt to influence a business decision.

Cash or cash equivalents

In general, it is against 3M's policy to offer or accept cash or cash equivalents such as gift cards, gift certificates, or vouchers. There may be rare exceptions to this policy. For help, contact 3M Ethics & Compliance (ethicsandcompliance@mmm.com).

Read the following list of business courtesies and decide whether it would be appropriate to offer that item to a Business Partner, under 3M's policies.

Business lunch at a casual restaurant

Appropriate!

It is fine to offer a modest lunch to a Business Partner when there are legitimate business purposes for the meeting.

A monthly basket of fruits and cheeses

Not Appropriate!

These gifts are too frequent to be appropriate under 3M's policies.

An iPad for a Business Partner's son who is starting college

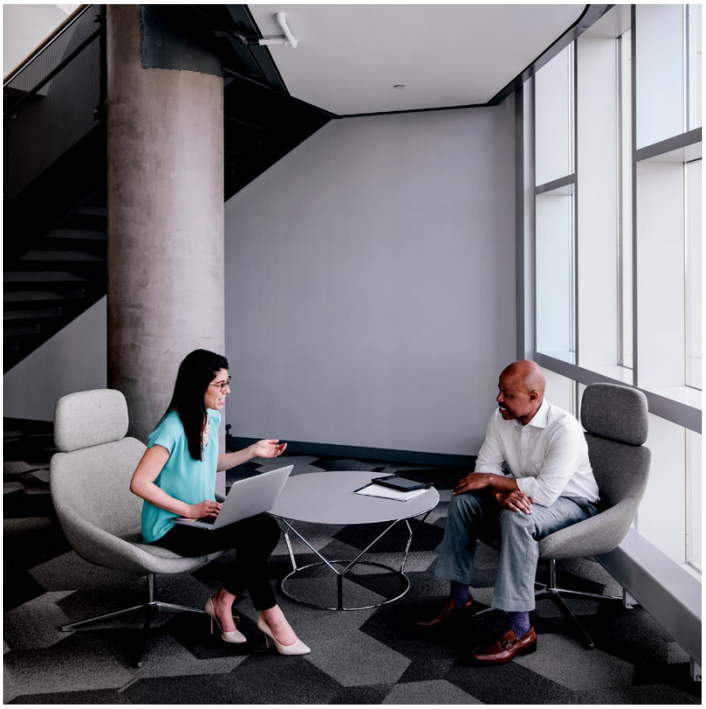
Not Appropriate!

This gift is too valuable and could seem like an attempt to influence a Business Partner's judgment.

A shirt with the 3M logo

Appropriate!

This is an item of modest value branded to 3M, which is usually fine to offer to a Business Partner. Remember you must follow specific policies, standards, and local laws regarding the exchange of business courtesies with Government Officials and Health Care Professionals (HCPs).



For those of us who work with government officials or health care professionals (HCPs), we must exercise additional caution when offering business courtesies. It may be illegal to offer anything—even a modest meal or a promotional item. If you are considering offering a business courtesy to a government official or health care professional (HCP) speak with your manager or supervisor beforehand. Remember that laws vary across countries, and even if exchanging business courtesies is permitted under local laws, it may not be permitted by 3M's policies. Be sure to check with local Legal Counsel and 3M Ethics & Compliance.

For more information, see the following resources:

- Gifts, Entertainment, Meals and Travel Principle
- Business Courtesy - Gifts, Entertainment, Meals (GEMS) Standard
- Sponsorship Standard

Interacting with Business Partners

When we work with Business Partners, we have a responsibility to be sure that they are operating ethically, according to the law, and consistent with our expectations and, for suppliers, with the 3M Supplier Responsibility Code. Our Business Partners' actions reflect on 3M, and in certain circumstances 3M could be held legally responsible for them. In some cases, we may be required to conduct a more detailed review of some of our Business Partners using the 3M Integrity Assessment process. It is up to us to demonstrate high-integrity leadership, explain our expectations of doing business the right way to our Business Partners, and ensure they consistently meet those expectations.



Anton is managing the opening of a new 3M facility, and he needs to find a lobbyist to represent 3M's interests before the local government at an important session next week. He meets with a lobbyist who is offering Anton a great rate for his services. Anton feels pressured to move quickly. Can he skip completing due diligence through 3M's Integrity Assessment process, just this once?

A. Yes, as long as the lobbyist gets good results for 3M.

B. Yes, as long as the lobbyist gives his word that he operates ethically.

C. No, it is more important to perform due diligence and make sure this Business Partner meets our standards.

The correct answer is C.

Working with ethical Business Partners is more important than getting good results or fulfilling a business need quickly. Although we trust our Business Partners, we must verify that they act ethically. We need to perform due diligence in order to confirm it for ourselves. 3M considers certain Business Partners, like lobbyists, high-risk vendors according to the United Nations Standard Products and Services Code (UNSPSC). Any potentially high-risk relationship like this must be reviewed closely and may require an Integrity Assessment.

For more information, see the following resources:

- 3M Supplier Responsibility Code
- Integrity Assessment System
- 3M Business Partner Expectations Brochure

Working with the Government

Business interactions with government entities are often subject to strict regulations and requirements, which we have a responsibility to meet. Always be honest, accurate, and forthright in all dealings with government officials, agencies, contractors, and subcontractors, complying with all applicable laws, regulations, and 3M policies. We must follow all requirements in government contracts, never deviating from the contract's terms.

There are specific negotiation rules for government contracts, which we must know and follow. Before entering into a government contract, be sure to consult your 3M Legal Counsel or 3M's Government Contract Compliance Department (governmentcontractcompliance@mmm.com).



For more information, see the following resources:

- Anti-Bribery Principle
- Doing Business with Government Agencies and Contractors Principle
- Gifts, Entertainment, Meals and Travel Principle
- Government Contract Compliance Policy
- Hiring Former and Current Government Employees or their Relatives Policy

Integrity in Sales and Marketing

To the public, 3M's **promotional and marketing materials** represent more than just our products and services—they represent our Company as a whole and each of us who works here. To best represent the 3M brand and our value of being honest, these materials must always represent our products and services fairly and accurately. Any claims we make about 3M's products and services should be appropriately substantiated and approved, helping us make sure that we are making commitments we can keep.

Our high-quality products and services, combined with our values and integrity, give us a competitive advantage in the marketplace—we do not disparage others in order to succeed. Where statements about competitive products or services are allowed by local law, be sure that any claims you make comparing competitors' products or services to 3M's are properly substantiated through appropriate testing. Never unfairly criticize our competitors or seek to improperly discredit their products or services.

In addition, we must use only legal, honest means to gather information about our competitors. Never conceal your identity as a 3M employee to collect competitive information or force or coerce anyone else to disclose such information. In the event you are offered competitive information that you feel should not be disclosed, refuse to accept the information and notify your manager or supervisor.

For more information, see the following resources:

- Advertising and Product Representation Principle
- Advertising and Product Representation Policy
- Advertising and Product Representation Standard

Promotional and Marketing Materials

Sales materials, advertising, packaging, promotional materials, product information, and any other similar communication.



Be Fair

Bribery

Our key values of fairness and integrity are central to our sustainable business growth around the world. We never gain or keep business through unethical means, such as bribes, kickbacks, or other corrupt payments—regardless of any local business custom.

We comply with the US Foreign Corrupt Practices Act, the UK Bribery Act, Brazil's Clean Company Act, and any local anti-corruption laws that apply to us. We must not accept or provide bribes and we must be especially careful when working with government officials. It is illegal to offer, promise, give, or accept anything of value to a Business Partner or government official that could corruptly influence them.

Key terms

Anti-bribery laws can be complex. It is important to understand the terminology involved.

Keep in mind that these rules apply to all 3M People, not just employees. Anyone who works on 3M's behalf must never offer or accept any sort of corrupt payment. In addition, when selecting a Business Partner, avoid anyone who has a history of bribery or unethical conduct. Remember, we must perform due diligence on all third parties as required by our Integrity Assessment procedures. Speak to your manager or supervisor, your assigned 3M Legal Counsel, or a member of 3M Ethics & Compliance if you have questions related to bribery or corruption.



Bribe

An offer or promise—either direct or indirect—to give or accept something of value with the intent to gain an improper advantage or improperly influence a decision. Bribes can come in many forms, including favors, gifts, charitable or political contributions, offers to hire a government official's relative, or even discounts that are not available to others.



Kickback

The return of a sum of money paid (or due to be paid) as a reward for making or influencing a business arrangement. A kickback differs from a bribe in that kickbacks are generally solicited by the buyer's employees, whereas bribes are generally offered by the seller or those seeking to gain an unfair advantage.



Facilitation payment

Generally, a small payment made to speed up a non-discretionary government action, such as obtaining a permit or starting a utility service. 3M prohibits facilitation payments.



Government official

This is a broad term that includes:

- Anyone acting on behalf of a government or its departments, agencies, or divisions
- Employees or associates of institutions owned or controlled by a government, such as public universities, hospitals, utility companies, or transportation authorities
- Political candidates and political party officials
- Employees of some international organizations, such as the United Nations
- Members of royal families

Larissa works at a 3M manufacturing plant that needs to renew an environmental permit for handling a specific chemical that is frequently used. Upon submitting the renewal paperwork, the clerk at the permit office hands her an empty envelope and tells her that it will take at least two months to process the permit, unless the envelope is filled. Larissa knows that if the permit is not obtained in time, the plant will have to shut down.

What should she do?

A. Speak to her manager or supervisor, management, 3M Legal Counsel, or a representative from 3M Ethics & Compliance immediately.

B. Make the payment, as long as it is a small amount of money.

C. Ask a local agent to make the cash payment for her, so it is not coming directly from 3M.

The correct answer is A.

This is a request for a bribe, and Larissa should seek guidance to help her make the right choice. 3M does not pay bribes, even if it is a small amount of money. In addition, remember that we are responsible for actions that third parties take on our behalf, so we never knowingly allow anyone we work with to make corrupt payments.

For more information, see the following resources:

- Anti-Bribery Principle
- Anti-Bribery Policy
- Integrity Assessment (IA) Standard

Fair Competition

We succeed by selling innovative, quality products and competing vigorously, not by manipulating the market. In the marketplace, we follow the letter and spirit of the antitrust and competition laws that apply to us. These laws aim to encourage competition, so that customers are provided with products at competitive prices.

What activities could be considered anticompetitive?

Many different business activities may be considered anticompetitive. Certain business practices, such as agreements with competitors to set (or fix) prices or allocate to customers or territories, always violate antitrust and competition laws and can result in criminal sanctions. These agreements or understandings may be written or oral, or formal or informal. Many other business activities, such as restrictive supply or distribution agreements or unfairly using a strong market position to harm competition, also may violate antitrust and competition laws in some situations. Because antitrust and competition laws vary from country to country and are complex, consult your assigned 3M Legal Counsel for advice about your specific situation.



Here are several examples of anticompetitive behaviors.

Price fixing

Making an agreement with a competitor to raise, lower, or stabilize prices or other competitive terms.

Market division or customer allocation

Dividing customers, territories, or markets among competitors.

Bid rigging

Coordinating bidding activity with competitors.

Output restriction

Agreeing with a competitor to reduce output or restrict capacity.

Group boycotts

Agreeing with a competitor to not do business with targeted individuals or businesses.

Monopoly or abuse of dominant position

Using a dominant market position to impose exclusive dealing terms on customers, such as pricing, discounts, rebates, or other terms.

Paola is a sales representative for 3M in a large city. At a café, she runs into her friend Rafael, who is a sales representative for a competitor. Paola mentions that the two of them always seem to be competing for the same contracts, and Rafael says, "Let's make it easy on ourselves. Let's alternate bidding lower on big contracts, so that we both meet our quota."

What should Paola say in response?

A. "I don't know… let me think about it."

B. "No, that wouldn't be right. Sorry, I have to go."

C. "Maybe just for a little while. This has been a tough quarter for me."

The correct answer is B.

It is a clear choice: anticompetitive behavior like this is never okay. Remember that even discussing this type of behavior can be against the law, so it is important to make your position clear and leave. You must report the conversation as soon as possible to your assigned 3M Legal Counsel, manager or supervisor, or 3MEthics.com.

For more information, see the following resources:

- Antitrust and Competition Law Principle
- Antitrust and Competition Policy
- Antitrust and Competition Standard



Product Quality

Our customers depend on 3M's products to advance, enhance, and improve their companies, homes, and lives—and we have a responsibility to live up to those expectations. For this reason, we must strive to produce only the highest quality products. Every item we sell must meet rigorous quality standards and must be safe for its intended use. We must follow all laws, regulations, and 3M policies, standards, or procedures that deal with the quality and safety of our products. If you become aware of a quality or safety concern, report it immediately.

If you are a manager or supervisor, you have additional responsibilities in this area. You should be prepared to address any safety or quality concerns that are reported to you, and you must ensure that your direct reports are properly trained regarding all applicable laws, regulations, and 3M policies, standards, and procedures. In this way, you help to create a culture of ethics and compliance, where all 3M people can live up to our Company's values.

For more information, see the following resources:

- Product Safety, Quality, and Stewardship Principle

Adam works in quality control in one of 3M's manufacturing plants, and he notices that the adhesive in one recent batch of one of the Company's best-known products is below the specification limit for adhesion.

The plant is really busy lately, so Adam decides not to raise the issue. It is only one batch out of thousands, and it would be a hassle to interrupt the production schedule to remake the product.

Is he making the right choice?



Not Appropriate.

No, he is not. Every product that we ship needs to meet our specifications and quality standards. It does not matter if it would be costly or inconvenient to correct this mistake; keeping our commitments to our customers is more important. Adam should take this opportunity to show high-integrity leadership by reporting his concerns to his manager or supervisor or another resource.

Political Activities

Many 3M people engage in **political activities.** These activities, while commendable, should not interfere with your work at 3M. With the exception of approved 3M and 3M Company PAC political activities, you should never use 3M's resources for political activities or give the impression that 3M sponsors any candidate, referendum, or ballot initiative.

3M Government Affairs lawfully advocates for our Company's business interests. 3M and the **3M Company PAC** sometimes make lawful political contributions. Any corporate political contributions outside the United States must be approved by the Area Corporate Affairs Vice President and assigned 3M Legal Counsel.

At times, 3M may engage in **lobbying.** Lobbying activities are highly regulated in some countries, and they often come with detailed registration and reporting requirements.

If you interact with government bodies or officials, be sure to know and follow all lobbying laws and reporting requirements. Doing so helps us accurately represent the Company's interests while meeting all legal requirements. If you need guidance, contact your assigned 3M Legal Counsel or 3M's Government Affairs Department.

For more information, see the following resources:

- Lobbying and Political Activities Principle
- Lobbying Policy
- Lobbying Standard

Political Activities

This can include campaigning, distributing literature, fundraising, and hosting events.

3M Company PAC

A separate fund made up of voluntary employee contributions that is organized in the US under the Federal Election Campaign Act.

Lobbying

Communicating with lawmakers and public officials in a legal and transparent way to support legislation and other government action that may affect the Company or our employees.



Be Loyal

Conflicts of Interest

At 3M, each of us has a responsibility to make decisions that are in the best interest of 3M. Disclosure is needed for those personal interests and activities that create potential conflicts of interests. When you disclose a potential conflict of interest to your manager or supervisor, you protect yourself and 3M.

Conflicts of Interest are situations in which your personal interests or relationships influence—or could reasonably appear to influence—decisions you make on 3M's behalf. Conflicts of interest can harm 3M's reputation and business success.

If you think you have an actual or potential conflict of interest, disclose it immediately. Disclosing conflicts of interest as soon as possible helps us maintain our culture of integrity.

For more information, see the following resources:

- Conflict of Interest Principle
- Conflict of Interest Policy
- Conflict of Interest Standard

Mei-Ling is a supervisor in one of 3M's manufacturing plants. Her son, Jian-Hong, runs a small janitorial company. Mei-Ling sits on a committee that makes decisions about which suppliers the plant should hire for maintenance needs. They are currently looking for a new janitorial company and soliciting bids from different suppliers, including Jian-Hong's company. Mei-Ling would like to give the contract to her son's company. She knows they do good work. Can she do that?

No, she cannot. Mei-Ling cannot be involved in the supplier selection process that includes her son's company, because she has a conflict of interest. As such, she must remove herself from the bid process for the new janitorial service. Additionally, she should not seek to influence any other committee members, or, if her son's company is selected, be involved in any negotiation or oversight of the relationship. Given the conflict, an even better solution is for her son's company to remove itself from bidding on this work. We need to keep professional and personal relationships separate, to make good business decisions and to do what is right for 3M.

If you have questions about working with family or friends, speak to your manager or supervisor or any resource listed in the "Speak Up" section.

Several common situations that may lead to conflicts of interest are:

- Conducting 3M business with a family member, significant other or close friend. We must avoid situations where we mix personal relationships and business, as this could create a conflict between doing what is right for a friend, relative, or significant other and what is right for 3M. This includes making a business decision that would directly affect anyone we have a personal relationship with, such as hiring them as an employee or vendor, buying goods or services from them on 3M's behalf, or providing them with an unfair business advantage.
- Conducting 3M business with a former 3M employee. Sometimes 3M employees leave our Company and work with companies that conduct business with 3M. Business dealings with these individuals can give rise to conflicts of interest, especially if their company, or 3M, seeks or receives an unfair business advantage. It is important to disclose any business dealings with former 3M employees to avoid a potential conflict of interest.
- Outside employment. We may not accept outside employment that negatively impacts or interferes with our responsibilities at 3M, such as working for a competitor or starting a business that competes or does business with 3M.
- Investing in other companies. Avoiding significant interests in companies that are competitors, suppliers, or customers of 3M helps us steer clear of conflicts of interest. However, it is usually okay to have small investments in publicly traded companies.
- Serving on a board of directors. If you are asked to serve on the board of directors of a charitable, educational, or nonprofit organization, or trade association, speak to your manager or supervisor before agreeing, in order to make sure the situation does not create a conflict of interest. You must also get management approval before accepting a position as a director or officer of any outside organization.

Damien is good friends with Tyler, who used to work with him at 3M but now works in the procurement department for ABC Company, one of 3M's largest customers. Damien has drafted the following email to send to Alyssa, who works in 3M's sales department. Should he send it or delete it?

To: Alyssa Smith
Subject: Contract with ABC Company

Hello Alyssa,

I heard that you are working on updating 3M's contract with ABC Company. I happen to know that Tyler is working on that deal for ABC. Tyler used to work here at 3M, and we are still good friends. Would you be able to offer him a discount on his company's next order? I know it would help him make a good impression at his new company.

Thanks,
Damien

Not Appropriate!

He should delete the email. Damien is asking Alyssa to give Tyler's company special terms based on their personal relationship—and that is not fair. Our personal relationships must not affect business decisions that we make for 3M.

3M's Assets

3M's assets are essential to our Company's success. No matter which assets we use or have access to as part of our work, our responsibilities are the same:

- **Safeguard 3M's assets**
- **Limit personal use of 3M assets**

We should use 3M's **electronic resources** wisely. To protect 3M's information and allow our Company to continue to achieve a competitive advantage, we must be careful when using electronic resources in public. When conducting 3M business, use only devices and systems managed and maintained by 3M, unless otherwise authorized. All devices must meet 3M's security standards. Always protect passwords and user IDs. When we use Company electronic assets, we must follow both the law and our Company's policies, and we should always be cautious when downloading or opening attachments or software from unknown sources. As with physical assets, our personal use of electronic resources must be limited, and we must never use them to send or view inappropriate materials, or to conduct work for an outside business or for personal gain. When allowed by local law, our Company may monitor and disclose your use of any 3M assets, including electronic resources. Accordingly, you should have no expectation of privacy when using 3M's electronic resources.

Assets

Assets can include facilities, supplies, equipment, computer systems, vehicles, and Company funds, among others.

Safeguard 3M's Assets

3M provides us assets so that we can perform our job responsibilities, and we have an obligation to protect them from loss, waste, and misuse.

Electronic Resources

This includes computers, software and services, mobile phones, servers, databases, wireless devices, tablets, email systems, voice messaging systems, remote access tools, internet connectivity, and any device that stores or connects to 3M data.

Limit Personal Use of 3M Assets

Our personal use of 3M's assets should be limited, reasonable, and only as appropriate. In general, we should use Company property only as needed to perform our work for 3M.

Tamara works in accounts payable at 3M. She receives an email from her supervisor, asking her to wire $50,000 to an account she does not recognize.

As she looks more closely at the email, she sees that it came from an email account in her supervisor's name, but not his usual 3M account. Tamara decides that this email must be a phishing attempt, and she deletes it.

Did she do the right thing?



Not quite. Tamara was right to take a closer look at the email to make sure it really came from her supervisor. However, instead of just deleting the email, Tamara should notify IT Information Security so that they can look into the situation further and advise her how to proceed.

For more information, see the following resources:

- Electronic Resources Principle
- Electronic Resources and Acceptable Use Policy

Personal Information

Part of our commitment to being respectful relates to how we handle **personal information** we might have access to about other 3M People, customers, patients, or Business Partners. We must always get permission before collecting, using, or disclosing this information. Those of us with access to personal information must safeguard it, use it lawfully and properly, and never share it with anyone who does not need to know it or is not authorized to receive it. Data privacy laws can vary by country, so we should speak to our 3M Legal Counsel if we have any questions about the right way to handle such information.



Personal Information

Information that, either alone or in combination, identifies an individual. It might include someone's contact information, health information, national identification number, marital status, or similar information.

Lorraine works in Human Resources at a 3M office in France. She needs to share some sensitive personal information about French employees with a colleague at a 3M office in the US, so she organizes the information in a spreadsheet and emails it to her American colleague.

She knows that data privacy laws in the two countries are different, but she is just sharing the information within 3M, so she figures it must be okay.

Is she right?

No, she is not. Ensuring compliance with all local laws can be complicated when transferring sensitive personal information across borders, even within our Company.

At 3M, we follow all data privacy laws that apply to us. Lorraine should check with her manager or supervisor or 3M Legal Counsel about the best way to handle this situation. If you have questions about working with sensitive personal information, do not hesitate to ask questions and speak up.

For more information, see the following resources:

- Data Privacy Principle
- Global Privacy Policy
- Information Classification and Handling Standard



Confidential Information

3M is constantly developing innovative products to build our Company's competitive advantage. To accomplish that, we rely on our Company's **confidential information,** which is one of its most valuable assets.

At 3M, information is classified as described in the Information Classification and Handling Standard. We must know the classification of 3M information we create and have access to. All information, other than public information, must be treated confidentially. Never disclose confidential information outside the Company without explicit approval and appropriate confidential disclosure agreements. Even within 3M, do not share confidential information with people unless they have a "need to know."

Confidential Information

This includes any secret or restricted information that belongs to our Company, customers, Business Partners, or competitors.

What is Confidential Information?

We have a responsibility to protect 3M's confidential information. This can include several different categories of information.

Product information

This could include information about future products, potential product improvements, product formulas or drawings, records of invention, unpublished patent applications, technical reports, or proprietary manufacturing methods and processes.

Financial information

Examples include sales figures, earnings projections, information about pricing or profit, or any other information related to 3M's finances.

Organizational information

This includes business plans, customer lists and customer or business partner information.

Customer and Business Partner Information

This includes 3M customer, supplier or other third-party information that 3M is legally obligated to protect or keep confidential, including point of sale data.

Keep in mind that this is not a complete list. Speak to your manager or supervisor if you have questions about what information is or is not considered confidential information.

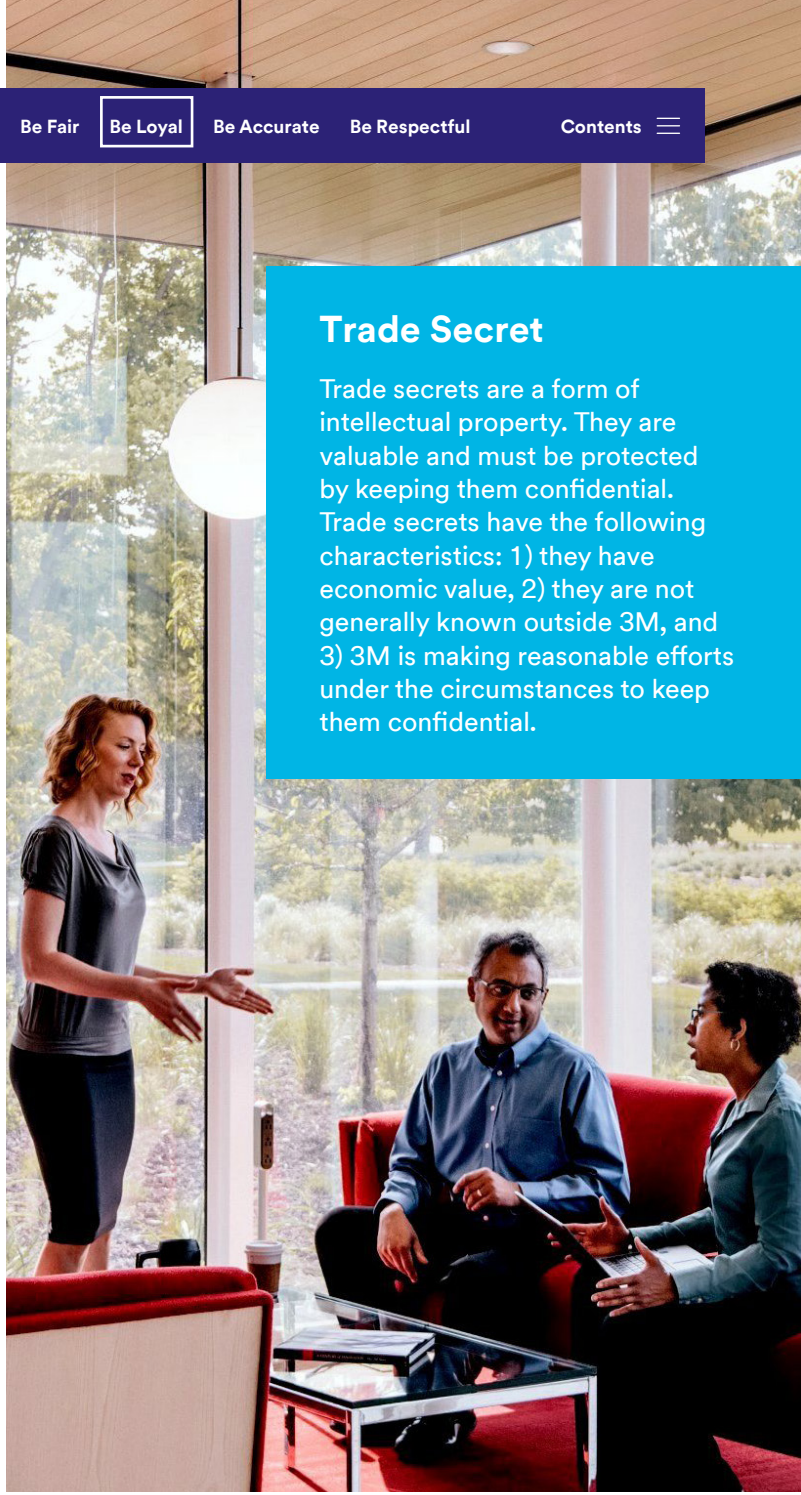
Some confidential information may be considered a **trade secret.** We must be careful with this information, ensuring that we never accidentally disclose it, or leave it where others may find it.

We may use confidential information we have access to only for business purposes, being careful not to share it with anyone unless they are authorized and have a business reason to know it—even within 3M. Be careful when discussing 3M information in public places, as you may be overheard.

We must also protect confidential information that belongs to other companies. If you have access to a Business Partner's information, safeguard it the same way you would 3M's, and do not share it with anyone who does not have a business need to know it. Speak to your manager or supervisor or another resource listed in "Speak Up" if you have questions about how to handle third party confidential information.

For more information, see the following resources:

- Information Security, Trade Secrets and Confidential Information Principle
- Information Security Policy
- Information Classification and Handling Standard



Trade Secret

Trade secrets are a form of intellectual property. They are valuable and must be protected by keeping them confidential. Trade secrets have the following characteristics: 1) they have economic value, 2) they are not generally known outside 3M, and 3) 3M is making reasonable efforts under the circumstances to keep them confidential.



Zhang's daughter Li is studying to be an engineer, and she is interested in how 3M's manufacturing plant applies the concepts she is learning in her classes.

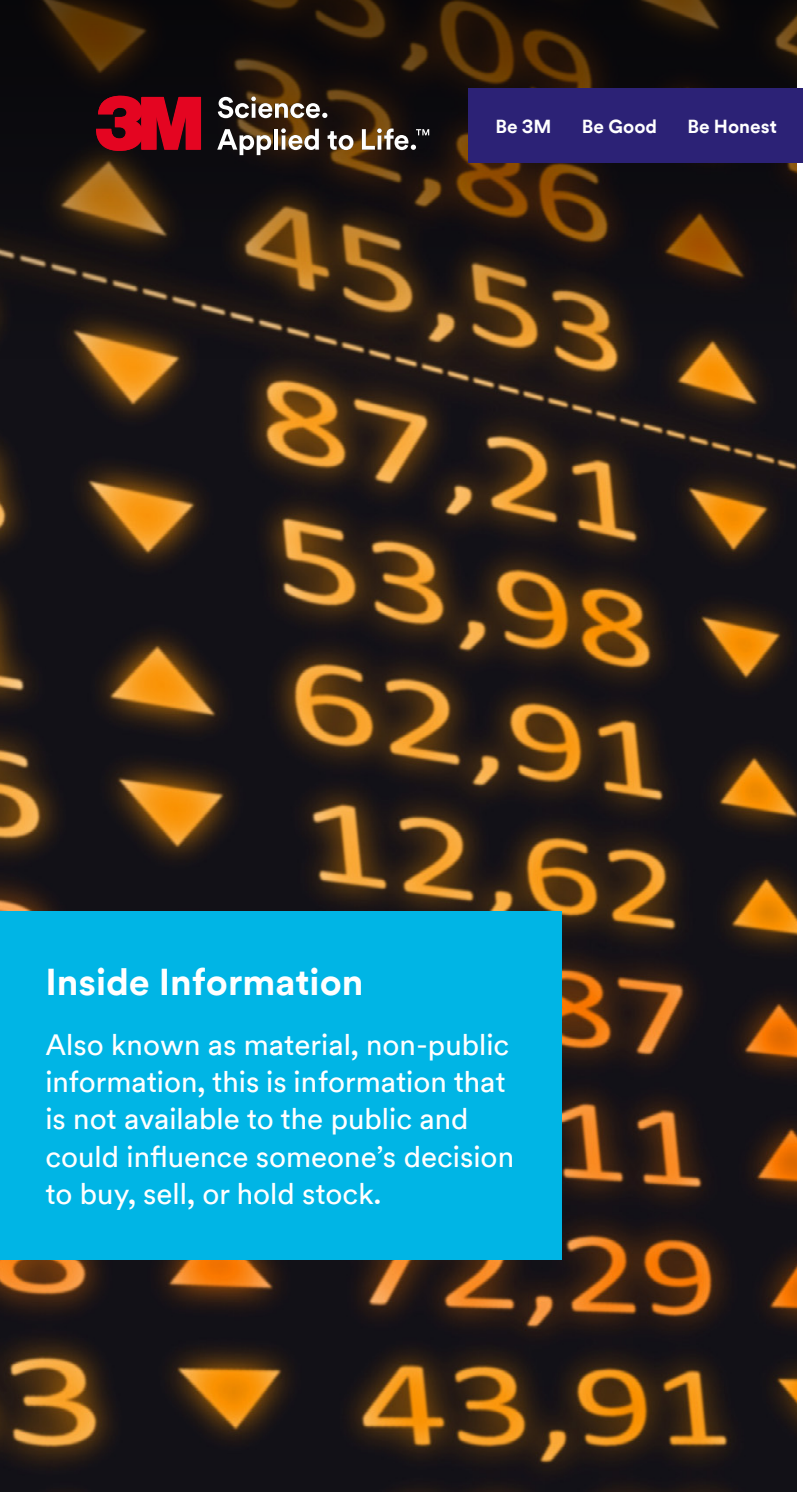
Can Zhang give Li the 3M plant's procedure manual, which explains the manufacturing process in detail? Li is not going to use it for a project or share it with anyone; she is just curious.

A. Yes, it is fine for Zhang to do so, so long as Li keeps what she learns to herself.

B. No, 3M's confidential information has to be protected.

The correct answer is B.

It does not matter if Li is going to keep the information to herself. Zhang, like all 3M people, has a responsibility to protect our Company's confidential information and share it only with people who are authorized to receive it and have a business need to know it—and that does not include his daughter.



Inside Information

Also known as material, non-public information, this is information that is not available to the public and could influence someone's decision to buy, sell, or hold stock.

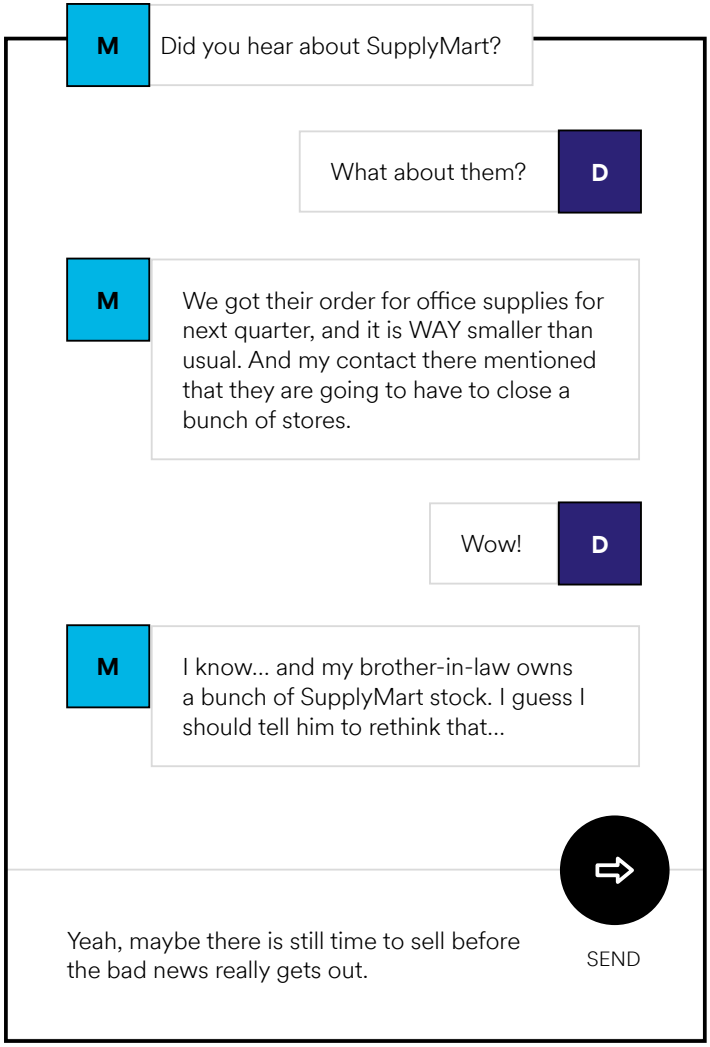
Insider Trading

Our work for 3M may give us access to **inside information.** Keep in mind that this information does not have to be about 3M; we may also have access to material, non-public information about other companies, such as 3M's customers or suppliers.

Regardless of what company the information relates to, the expectation is the same: we must never trade in that company's stock or other securities while we have material, non-public information. Even after this information is released to the public, we must wait one full trading day before buying or selling stock or other securities in that company.

Insider trading is not just unethical—it is also illegal. Anyone who trades on material, non-public information could face criminal penalties, including jail time. If you reveal inside information to someone else (a practice called tipping), you could still be in violation of insider trading laws—even if you yourself did not make a trade or profit. Insider trading laws can be complex, and it is vital that we all follow them. Speak to your manager or supervisor or your 3M Legal Counsel if you have any questions.

Read the following instant message conversation. Should Daria send the message she has written?



Not Appropriate!

No, she should not send the message. This news is not public yet and is likely material, so Milo cannot share it with his brother-in-law.

Remember that insider trading laws apply not just to our activities, but also to those of our friends and family. Daria should not send the message as drafted but should immediately inform Milo not to share the information with his brother-in-law. Milo and Daria should contact their assigned Legal Counsel if they have questions.

For more information, see the following resources:

- Securities Trading and Insider Information Principle
- Securities and Insider Trading Policy



Social Media

Many 3M People use social media to connect with friends and family members or learn more about the world. We all have a responsibility to exercise caution when speaking about our Company or its business via social media platforms.

How you conduct yourself on social media not only reflects on you—it can be a reflection on the Company. Only a limited number of people are authorized to speak on behalf of the Company. Do not overstate your authority to speak for 3M.

When using social media and posting about topics related to 3M's business, products, services, or industries, be sure to clearly disclose, as part of your post or comment, that you are a 3M employee and identify your opinions as your own.

Also, stick to your experiences and be careful not to make claims you cannot support. We should also never reveal any confidential or proprietary 3M information in our online activities.

Which of these social media updates is okay to post?

Shellandra:

Is anyone looking for a new Executive VP of Marketing? My boss is about to announce his resignation, and he is looking for a new opportunity.

Claudia:

The prep for this new product release is KILLING ME! The whole medical division has been working overtime on this secret launch.

Jaime:

Great 3M volunteer day today! Check out the pictures on the Company's page.

Jaime's update is okay to post.

Jaime's update contains only publicly available information about 3M. The other updates give away confidential information about 3M, so they are not appropriate to post on social media.

For more information, see the following resources:

- Social Media Policy
- Social Media Affiliation Disclosures Standard
- Social Media Employee Advocacy Standard
- Social Media Account Governance Standard
- Digital Paid Media Standard

Speaking for the Company

Occasionally we may find ourselves involved in discussions that relate to 3M. In these situations, we should be careful not to speak for the Company or give the impression that our views represent 3M. The Company has authorized spokespersons who will give 3M's official position on specific issues. If you are approached by the media, you should refer them to 3M Corporate Communications.

For more information, see the following resources:

- 3M Communications Policy





Be Accurate

Accurate Books and Records

As part of our work for 3M, many of us create **business and financial records.**

These records are important to our Company's business decisions and operations, and we all have a responsibility to ensure they are accurate, up to date, truthful, and complete. Make sure you follow all laws, regulations, and Company policies, standards, and procedures when creating business and financial records, seeking guidance when needed.

Keeping accurate records is not just about creating documents—it is also about managing them. We must know and follow 3M's internal controls and policies about records management, including maintaining, retaining, and correctly disposing of records. If you are asked for records or information as part of an audit or an investigation conducted by 3M or its external auditors, you have a responsibility to be transparent and provide full and complete information. Doing so helps 3M complete the audit or investigation quickly, and it demonstrates our culture of compliance and ethics.

Business and Financial Records

Some examples include purchase orders, contracts, manufacturing records, expense reports, invoices, manufacturing and laboratory data, government-required financial disclosures, other financial statements, regulatory reports to government entities—even routine things like emails and timesheets.

Liliana works in sales at 3M, and she just closed a big deal with a new client. Business was a little slow last quarter, and she did not meet her sales goal.

She already has a few deals lined up for the next month, so she knows she will not have any trouble meeting her goal this quarter. She figures she will backdate the sales from her new client to last quarter, so she can meet that sales goal.

Is that okay?

Not at all. Our financial records need to accurately reflect every transaction. Regardless of her sales goals, the orders from Liliana's new client should be recorded on the day they were shipped. No matter what work we do for 3M, we all have a responsibility to make sure the Company's records are complete and accurate.

For more information, see the following resources:

- Internal Controls, Financial Reporting, Document Retention, and Auditing Principle
- Financial Reporting Policy
- Internal Controls Policy
- Tax Global Financial Policy
- Global Procurement Policy

Money Laundering

3M is committed to complying fully with all anti-money laundering and anti-terrorism laws throughout the world. 3M conducts business only with reputable Business Partners whose business activities are legal and whose funds come from legitimate sources. In support of that commitment, we must all watch for signs of money laundering and terrorism funding by monitoring our Business Partners for any indication of illegal activity and being alert to possible "red flags" that may appear in the course of business and signal a problem.

Use care in choosing 3M's Business Partners, and perform due diligence on all third parties as required by our Integrity Assessment procedures. We must keep complete and accurate records of all business transactions and follow the requirements for reporting cash transactions.

Money Laundering

Money laundering can be any scheme or process that seeks to hide or "wash" money that was obtained through illegal activities.

Make sure to promptly alert your assigned 3M Legal Counsel or 3M Ethics & Compliance of any suspicious activity.

For more information, see the following resources:

- Anti-Money Laundering Principle
- Anti-Bribery Principle

Global Trade Compliance

In all of our business activities for 3M, we must know and follow the international trade compliance laws that apply to us. This includes the laws that regulate the following:

Imports and customs activities	Exports and export controls	Trade embargoes and economic sanctions	Anti-boycott
Customs authorities and their partner government agencies around the world require that the importer of goods states or ensures accurate tariff classification, value, country of origin, product marking, preferential trade status, and other critical data elements.	Exports of certain products, technologies, software, and technical information may be subject to licensing requirements. Licensing requirements also apply to exports of products for sensitive end-uses—such as the development of weapons of mass destruction. Export can mean both physical movement of goods and intangible transfers, such as through email, discussions, or presentations.	Trade embargoes and economic sanctions prohibit some or all business activities with certain countries and their nationals, or with specific entities or individuals.	Under the trade laws of the US and other countries where 3M does business, we must not participate in unsanctioned boycotts, or refusals to trade with a specific country.

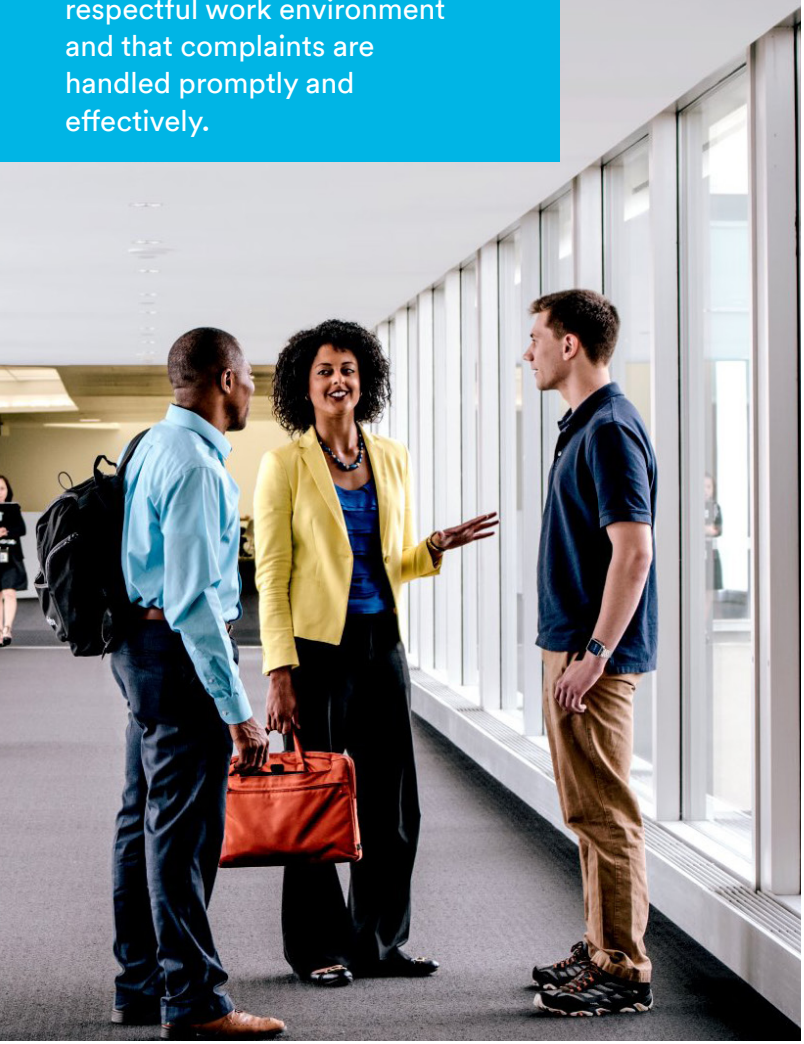
It is up to all 3M People to understand and follow the trade compliance laws that apply to our work—and to ask questions when we are unsure. Just as we must never participate in any trade activity that violates these laws, we may not ask a third party to do so on our behalf. If there is a conflict between 3M's policies and local trade laws, always follow the law. For additional guidance, please contact 3M's Global Trade Compliance Department.

For more information, see the following resources:

- Export, Import, and Trade Compliance Principle
- Export Compliance Policy
- Import Compliance Policy
- The Trade Compliance section of Policy Central

Be Respectful

Managers and supervisors must ensure that 3M offers a fair and respectful work environment and that complaints are handled promptly and effectively.

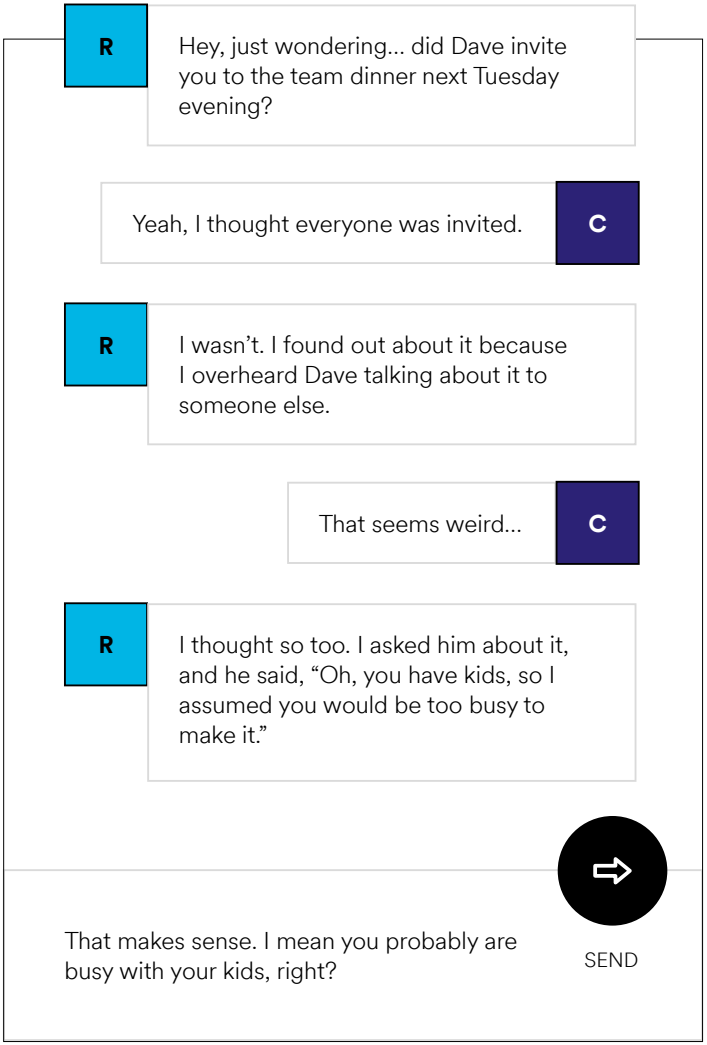


Discrimination

We bring together people who have different technical expertise, industry knowledge, mindsets, backgrounds, and experiences as a catalyst for innovation and growth. We remain committed to equal employment opportunities and non-discrimination.

To support and uphold our commitment, we all have a responsibility to create a respectful work environment. Accordingly, we maintain a work environment where all our people are respected, supported, and encouraged to take initiative to develop and excel. We never tolerate unlawful discrimination.

Read the following instant message conversation between Caitlin and Rosa, two 3M People who work in the same department. Decide whether or not Caitlin should send the response she has typed.



Not Appropriate!

Caitlin should not send this message.

At 3M, we treat everyone equally, and we never exclude anyone from work-related activities on the basis of factors like marital or family status.

Rosa should have been invited to this team dinner. She should speak to a resource listed in the "Speak Up" section for guidance about how to handle this situation.

Harassment and Disrespectful Behavior

Our actions and the way we treat one another are key to creating a productive and respectful work environment. We must always treat each other fairly and respectfully, never engaging in harassment or other unprofessional behavior.

In addition, we do not tolerate bullying at 3M. This includes both threats and acts of violence, as well as intimidation, use of abusive language, threatening conduct, and attempts to instill fear in others.
If you think you have experienced or witnessed discrimination, harassment, or bullying at 3M, speak up. You can voice your concern to your manager or supervisor or any other resource listed in our Code.
3M does not tolerate or permit retaliation for asking a question, making a report, or participating in an investigation.

Harassment

Unwelcome conduct based on a protected characteristic that creates an intimidating, hostile, or offensive work environment, causes work performance to suffer, or negatively affects job opportunities.

For more information, see the following resources:

- Respectful Work Environment Principle
- Non-Retaliation Policy

Forced Labor and Human Trafficking

3M complies with all applicable laws and employment regulations and does not engage or participate in forced labor.

We have those same expectations for all vendors doing business with us. Our approach to human trafficking, sometimes referred to as “modern slavery,” is very simple: we do not tolerate it.

We are committed to using effective systems and controls to prevent human trafficking from taking place anywhere within our business or supply chains.

Workplace Safety

As 3M People, we perform a variety of jobs in different environments, from offices to manufacturing facilities. No matter where we work, we must meet the safety standards that apply to us. We must follow all laws, regulations, and Company policies and procedures that apply to our work, such as those related to handling hazardous materials and working with tools and machinery.

Maintaining a safe workplace also means making sure that our actions do not create risk for ourselves or those around us. 3M never tolerates any threatening or violent behavior in the workplace, and at no time may we engage in risky behavior. This includes working on behalf of 3M while under the influence of any substance that could impair our actions or judgment, such as illegal drugs, misused prescription medications, or alcohol.

Those of us who serve as managers or supervisors need to ensure that the 3M People who report to us are properly trained on the relevant safety laws and policies, and we must address any reported safety issues promptly.

We have a responsibility to promptly report any safety issues or concerns. Of course, if you feel that you or someone else may be in immediate danger, contact your local emergency responders right away.

Read the following scenarios and decide whether each 3M employee is doing their part to create a safe workplace.

Cristobal pulled a muscle in his back last night, so he took some prescription painkillers this morning before coming to work. He feels a little bit dizzy, but he thinks he will still be able to get his work done, so he does not say anything about the pills to his supervisor.

Not Appropriate!

Wrong choice. This medication could affect Cristobal's ability to work. He should speak to his supervisor right away.

Francesca notices that an important piece of machinery is not working the way it should. Her coworker tells her it is fine to keep using it anyway, but Francesca decides to talk to her supervisor about it.

Appropriate!

Right choice. By telling her supervisor about the problem with the machinery, Francesca is keeping her workplace safe.



Lloyd works in a 3M research facility. He often mixes hazardous chemicals without wearing gloves because he knows he will be careful.

Are Lloyd's safety practices appropriate?

Not Appropriate!

Wrong choice. Even if he thinks he is being careful, Lloyd still needs to take the appropriate safety measures when working with hazardous chemicals.

For more information, see the following resources:

- Workplace Environmental, Health and Safety Principle
- Environment, Health and Safety (EHS) Policy
- Human Rights Policy
- Human Trafficking Prevention Standard
- 3M's EHS standards in Policy Central

Sustainability

At 3M, we know that our commitment to sustainability truly sets us apart from our competition. We innovate with purpose. We empower individuals to address issues that matter to them, and we collaborate with our customers and communities to take on shared global challenges—bringing value to both our business and our society.

We are committed to conserving natural resources, reducing our environmental impact wherever possible, and doing business in a way that protects the health and safety of 3M's employees, the communities where we work, and those who use our products.

Our goals are simple: we want to improve every life and ensure the long-term success of our Company.

There are a variety of sustainability initiatives that help us accomplish these goals.



Resources

We are constantly working to develop recyclable materials and use sustainable resources in our products. At 3M, we are finding ways to reduce our packaging in order to reduce our use of resources. We are striving to achieve zero landfill status at 30 percent or more of our manufacturing sites, and to reduce our global waste by another 10 percent.



Water

We create filtration systems that help our customers improve water quality and use water more efficiently. In our own work, we use water responsibly, and we have set an ambitious goal to reduce our water usage by 10 percent by 2025.



Energy

3M makes products that help our customers become more energy efficient. We have increased our use of renewable energy, with a goal of having 25 percent of 3M's electricity come from renewable sources by 2025.



Health and Safety

Building on our existing customer education program, we are educating workers and patients about the proper use of health and safety products—which is critical to infection prevention, personal safety, and overall health.



Education and Development

We support empowerment and enrichment to provide people everywhere the opportunity to live life to its fullest.



3M invests in programs that increase access for people worldwide to science, technology, engineering, math, and business skills.

Our Company also works to improve lives through investments in environment, health, and safety programs. Each of us is encouraged to develop career paths and opportunities aligned with our interests.

3M knows that making these types of investments is a core part of our sustainability strategy.

For more information, see the following resources:

- Responding to Customer Sustainability-Corporate Governance Requests Policy
- Global Impact Report or 3M.com/Sustainability



Volunteering and Charitable Giving

Just as we are passionate about our work for 3M, many of us are also passionate about volunteering for charitable causes.

3M encourages us all to become involved in our communities and give back. However, we should never use the Company's resources or Company time to support a charity without permission from a manager or supervisor.

Miranda participates in an "e-mentor" program that is organized through 3M and a local school district.

Once a week, she receives an email at her 3M email address from a high school student seeking advice and perspectives on education and professional development.

Miranda writes back from her 3M email address with information and stories about her own career path.

The program will last 10 weeks and midway through, Miranda will travel to the high school to meet her mentee. The visit to the high school is two hours long and occurs during the workday.

Before participating in this program, Miranda informed her manager about her plans, including the use of her professional email and the mid-day meeting that would interrupt her normal workday.

She asked if her manager had any concerns about this, and he did not.

What did Miranda do wrong?

A. Miranda's use of her 3M email address is an unreasonable personal use of 3M's electronic resources.

B. Leaving work for a volunteer "meet and greet" is not permitted.

C. Nothing. Miranda did everything right by informing her manager of the program and checking with her manager if he had any concerns.

The correct answer is C.

Miranda did everything right by talking with her manager about the program and being transparent about how the program works and the time commitment required of her.

For more information, see the following resources:

- Charitable Contributions Standard

3M Company
Ethics & Compliance
3M Center, Building 220-9E-01
St. Paul, MN 55144-1000 USA

Phone 1-800-228-3957
Web go.3M.com/3MEthics
Email ethicsandcompliance@mmm.com

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