



Lobbying and Political Activities Principle

Principle Statement:

As a concerned member of our communities, 3M actively participates in public policy and legislative advocacy, or "lobbying." As appropriate, 3M also may support candidates and political committees in elections. 3M resources may only be used for political or lobbying activities when consistent with 3M's Code of Conduct Principles and approved in advance by the PAC Board (for the U.S.) and the Area Corporate Affairs Vice President (outside the U.S.) and assigned 3M legal counsel.

3M's Government Affairs organization coordinates and oversees 3M's lobbying and political activities. Before hiring a lobbyist, engaging in direct lobbying, or communicating with public officials on 3M's behalf, 3M employees must consult 3M Government Affairs.

3M has constituted a PAC Board, which is made up of senior 3M executives and oversees 3M's political contributions and the activities of 3M's Political Action Committee (3M PAC). 3M PAC is a nonpartisan fund created under U.S. law and comprised of voluntary employee and stockholder contributions. 3M PAC is used to make contributions to U.S. federal, state, and local candidates as permitted by law.

3M respects our employees' rights to participate in the political process and to communicate with their elected representatives using their own time and resources. However, 3M resources and facilities must not be used for private, non-3M, political or lobbying activity.

3M values the engagement of public officials on matters that affect our communities and the industries in which we participate. Any such engagement on 3M premises or that involves the use of 3M resources must comply with all relevant laws and not give rise to any actual or perceived conflicts of interest. 3M employees are generally permitted to host elected and other public officials on our premises, subject to certain limitations, in accordance with Company policies and applicable laws. Elected officials, candidates for elective office, or their campaign surrogates may not, however, be hosted at a 3M facility or on 3M premises within 15 days prior to any election in which he or she is a candidate ("prohibited period"). The prohibited period includes hosting an elected official, candidate, or surrogate for any election or non-election related purpose. The prohibited period applies regardless of whether the official, candidate, or surrogate intends to reimburse the Company for the use of its facilities, and the prohibited period applies whether the 3M host or sponsoring employee is acting in a personal capacity or otherwise.

Purpose:

Lobbying is an appropriate way for companies like 3M to educate policymakers about the legitimate interests of 3M and our employees, but these communications must be conducted and reported in compliance with applicable laws.



The use of corporate resources to influence the political process is strictly regulated to protect and promote the integrity of the political processes of countries around the world. In the U.S. and around the world, national, territorial, state, and local governments often prohibit the use of corporate resources to support or oppose candidates or political committees.

This Principle applies globally to all employees and may apply to those acting on behalf of 3M. See the Compliance Principle for information on when a third party might be covered by the Code of Conduct Principles.

Additional Guidance:

- "Lobbying" means communicating with lawmakers and other public officials to help shape public policy on laws, regulations, and issues that affect our business and our employees. In the United States, 3M employees and others acting on 3M's behalf must comply with federal, state, and local lobbying laws. Lobbying laws vary depending on the level of government and government body and the nature of our engagement. In some states, traditional sales activities may constitute lobbying, triggering registration and reporting requirements. To ensure that 3M has followed registration and reporting laws that may apply, all employees must consult with 3M Government Affairs and their assigned 3M legal counsel in advance of contacting elected representatives or government employees to determine whether the proposed contact constitutes lobbying and requires registration, reporting, or other action. Any lobbying activities outside of the U.S. must be approved by 3M Government Affairs and assigned legal counsel.
- Any engagement of an external (i.e., non-employee) lobbyist or government affairs consultant must first be reviewed and approved by the Government Affairs Department and assigned 3M legal counsel. Any such engagement must be made under a written contract that requires the lobbyist to comply with all applicable registration and reporting laws, as well as 3M's Code of Conduct Principles. Reporting of lobbying activities and expenses is handled by 3M Legal Affairs.
- Unless permitted in advance by the PAC Board in the U.S. or the Area Corporate Affairs Vice President outside the U.S., with review by assigned legal counsel, 3M does not permit employees to distribute campaign literature, solicit campaign contributions, or participate in other political activities during paid working hours.
- 3M Government Affairs may – as permitted by law – invite officeholders and candidates for public office to visit 3M facilities and address 3M employees, except that no such visits may occur during the prohibited period (described above). No 3M employee is required to attend such events. 3M may refuse or limit candidate appearances on 3M property as permitted by law.
- 3M PAC is a non-partisan fund used to make contributions to U.S. federal and, where permitted, state or local candidates, parties, and political committees. 3M has established a PAC Board to oversee 3M and 3M PAC contributions to political campaigns, parties, or other political committees in the United States. Chaired by a senior 3M executive, the PAC Board reports to the Chief Executive Officer. Upon request, the PAC Board also reports to the Corporate Operations Committee and the Nominating and Governance Committee of the Board of Directors on 3M's political activities and contributions. Eligible 3M employees and shareholders may be asked to voluntarily contribute to the 3M PAC as permitted by U.S. law. Any employee may refuse



to contribute to 3M PAC without fear of reprisal. 3M will not reimburse any person for making contributions to 3M PAC or for any political contribution. Coercion of any employee to contribute to 3M PAC or to make any political contribution is unlawful.

- Outside of the United States, 3M will only make political contributions if approved in advance by the Area Corporate Affairs Vice President and assigned legal counsel.

Penalties:

Violations of the law and 3M's Code of Conduct may result in discipline, up to and including termination from employment.