

Be 3M

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

Message from Mike F. Roman



Great and enduring companies are driven by purpose, and built on a foundation of trust—trust from our customers, employees, partners, shareholders and communities. At 3M, we cannot break that trust—ever.

We've earned our reputation for integrity over many decades, and no one at 3M is free to compromise it. We owe it to all who count on us—especially our families and colleagues—to do business the right way, at all times and under all circumstances.

Every decision we make must be guided by our Code of Conduct. If you see something that doesn't look right, it is the responsibility of each of us to ask questions and raise concerns. Living and working by our values is fundamental to our continued success, as a company and as individuals.

Thank you for your commitment to doing business the right way.

Mike F. Roman

Chairman of the Board and Chief Executive Officer

Message from Ivan K. Fong



For over a century, 3M has built an extraordinary reputation for integrity and doing business the right way. Every day, you have the challenge, opportunity, and responsibility to maintain and enhance that reputation.

This responsibility is paramount: Nothing—not a request from a customer or a direct order from your manager, “making your operating plan” or personal loyalty—can or should justify compromising our collective commitment to integrity.

In addition, if you are a leader, you are responsible for creating a culture of compliance; for being a role model; for providing sufficient resources and training for compliance; for ensuring there are multiple channels to raise compliance concerns without fear of retaliation; and for promptly taking appropriate responsive actions when such issues are raised.

Perhaps most important, whether you are a supervisor or not, you do not shoulder this responsibility on your own. This handbook, for example, can help you spot issues and guide your decision-making under our Code of Conduct. Your manager, your Human Resources contacts, your assigned 3M Counsel, and our 3M Ethics & Compliance are among the many resources available to assist you.

Thank you in advance for your personal commitment to our Code of Conduct.

Ivan K. Fong

Senior Vice President, General Counsel and Secretary

Message from Michael Duran



Be 3M. It is what we do as a company and individuals to build on the ethical foundation of 3M. For more than a century, 3M has done things the right way, ensuring integrity is at the heart of what we do. We know that trust is an unwavering value that cannot be broken – trust in our employees, shareholders, customers and communities.

As a global company, we are facing new opportunities every day, which oftentimes come with added risks. Use the Code as your guide in this journey to answer questions and to solve ethical problems when the right choice may not be clear. It provides the foundation for the values we live by. These values can be felt all over the world.

It takes the collective effort of each one of us to make decisions every day to do the right thing, even when the choice is hard and things are not clear. It is always the right thing to do when you speak up and ask questions.

Michael Duran

Vice President, Chief Ethics & Compliance Officer
Ethics & Compliance

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



What does it mean to Be 3M? It means acting with honesty and integrity, making a difference in the lives of our customers, using our high ethical standards to create a competitive advantage for our Company, and creating an inclusive workplace for all.

Do Business the 3M Way

Around the world, customers rely on 3M to provide innovative solutions to advance companies, enhance homes and improve lives. We are defined by more than just what we make—we are defined by how we do business: the 3M Way, always making the right choices for our Company and our customers and protecting our reputation in all we do.

The Code of Conduct (“Code”) is part of the 3M Value Model, and positions 3M for long-term growth. Our Code summarizes the guidance provided in 3M’s principles, policies, standards, and procedures, which govern how we do business everywhere, every day. By living our Code, we create an inclusive workplace where each of us contributes to 3M’s vision. Our success depends on our integrity.

In some situations, the right choice might be clear. In more complex situations, our Code is here to provide guidance and insight for acting ethically. It also helps us know when to ask questions and where to get help when we need it.

In addition to meeting 3M’s high standards for integrity, we each have a responsibility to follow the laws and regulations that apply to the work we do and where we do business. If our Code conflicts with a local law, we should always obey the law. However, if the Code sets a higher standard for ethics and integrity than the law, we should follow the Code and get help from a resource listed in the “Be Good” section.



Meet High Standards

All **3M People** are held to the same high standards. If the Code sets a higher standard than the law, we are expected to follow the Code and do business the 3M Way.

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, inclusive work environment and a strong culture of ethics.
- ▶ Complete compliance courses and certifications on time.
- ▶ 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.
- ▶ Cooperate with investigations.

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:

- ▶ 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 mandatory compliance training courses and certification to the Code on time.
- ▶ Do your part to create a fair and respectful workplace.

For more information, see the following resources:

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





Be Good



Do Business Ethically

Acting ethically means more than just following the law. 3M People are expected to meet a higher standard, even if 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 help.

3M's Ethical Decision-Making Process

Ask yourself:

Am I following 3M's values?

It is up to you to do the right thing. If you have a question or concern, you can contact any of the following resources:

- ▶ Your manager or supervisor
- ▶ Your assigned Human Resources Manager
- ▶ 3M Legal Counsel
- ▶ [**3M Ethics & Compliance Department**](#)
- ▶ [**3MEthics.com**](#)

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

For more information, see the following resources:

- ▶ [**Compliance Principle**](#)
- ▶ [**Employee Obligations and Reporting Principle**](#)
- ▶ [**Ethical Business Conduct Principle**](#)

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

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 helping 3M succeed.

If you see or know of any misconduct, you have an obligation to report the issue, unless prohibited to do so by local law. 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**](#)
- ▶ [**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 law or the Code to your assigned 3M Legal Counsel, 3M Ethics & Compliance, your management, or [**3MEthics.com**](#).

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.

What is retaliation? Click here to find out.

If you think you have experienced or witnessed retaliation, contact one of the following resources:

- ▶ Your manager or supervisor
- ▶ Your assigned Human Resources Manager
- ▶ 3M Legal Counsel
- ▶ [**3M Ethics & Compliance Department**](#)
- ▶ [**3MEthics.com**](#)
- ▶ 3M Corporate Audit Department
- ▶ [**Audit Committee of the Board of Directors**](#)

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.

When offering or accepting business courtesies, there are several factors we need to keep in mind. Click each icon below to find out more.

**Value****Frequency****Timing****Cash or cash equivalents**

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

A monthly basket of fruits and cheeses

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

A shirt with the 3M logo



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 or Health Care Compliance, 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 3M Way to our Business Partners, and ensure they consistently meet those expectations.



Example

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?

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

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

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

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**.

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](#)

 **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. Click on each icon below to see definitions of important anti-bribery terms.

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.

Example

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?

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

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

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

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.



Click each icon to see examples of anticompetitive behaviors.

**Price fixing****Market division or customer allocation****Bid rigging****Output restriction****Group boycotts****Monopoly or abuse of dominant position**

Example

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?

For more information, see the following resources:

- ▶ [**Antitrust and Competition Law Principle**](#)
- ▶ [**Antitrust and Competition Policy**](#)
- ▶ [**Antitrust and Competition Standard**](#)

“I don’t know... let me think about it.”

“No, that wouldn’t be right. Sorry, I have to go.”

“Maybe just for a little while. This has been a tough quarter for me.”



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](#)
- ▶ [Quality Management System Quality Policy](#)
- ▶ [Global Quality Audit Management Standard](#)

Example

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?



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**](#)



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.

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

- ▶ **Conducting 3M business with a family member, significant other or close friend**
- ▶ **Conducting 3M business with a former 3M employee**
- ▶ **Outside employment**
- ▶ **Investing in other companies**
- ▶ **Serving on a board of directors**

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**

Example

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?

Click to find out!

Example

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

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.

Example

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?

Click here to find out!

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.



Example

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?

Click to find out!

For more information, see the following resources:

- ▶ [Data Privacy Principle](#)
- ▶ [Data 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."

What is Confidential Information?

We have a responsibility to protect 3M's confidential information. This can include several different categories of information. Click on each one to see more examples.

 **Product information** **Financial information** **Organizational information** **Customer and Business Partner Information**

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**](#)



Example

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.

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

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





Insider Trading

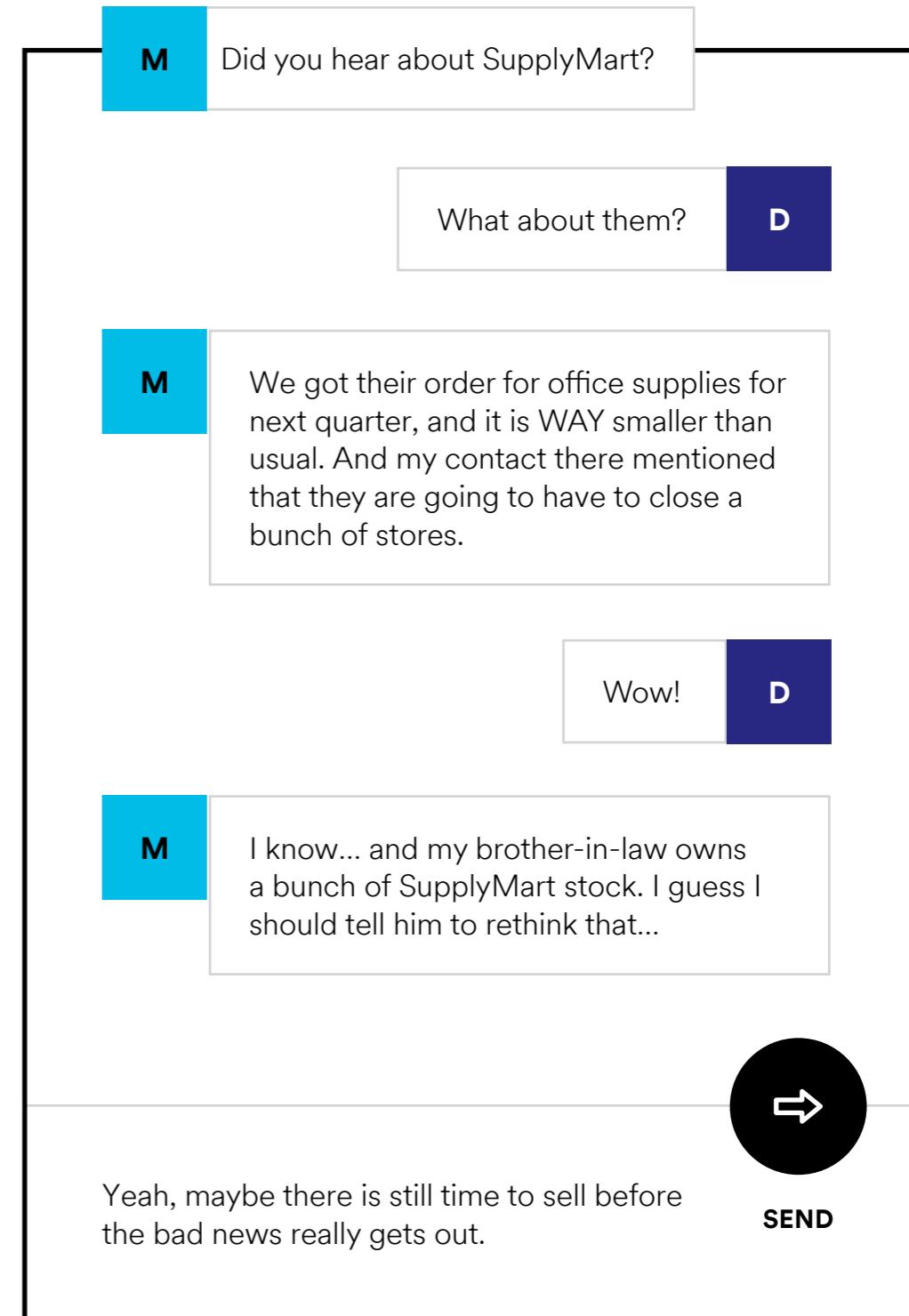
Our work for 3M may give us access to **inside information**. Keep in mind that this information does not have to be about 3M; we may also have access to material nonpublic information about other companies, such as 3M's customers or suppliers.

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 nonpublic information. Even after this information is released to the public, we must wait two full trading days 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 nonpublic 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.

Example

Read the following instant message conversation and decide whether Daria should send the message she has written.



M Did you hear about SupplyMart?

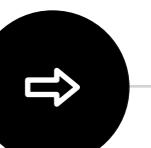
D What about them?

M We got their order for office supplies for next quarter, and it is WAY smaller than usual. And my contact there mentioned that they are going to have to close a bunch of stores.

D Wow!

M I know... and my brother-in-law owns a bunch of SupplyMart stock. I guess I should tell him to rethink that...

Yeah, maybe there is still time to sell before the bad news really gets out.

SEND 

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.

Example

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.

For more information, see the following resources:

- ▶ [Social Media Policy](#)
- ▶ [Social Media Affiliation Disclosures Standard](#)
- ▶ [Social Media Employee Advocacy Standard](#)
- ▶ [Social Media Governance Standard](#)
- ▶ [Social Media 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.

Example

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?

Click here to see the answer!

For more information, see the following resources:

- ▶ [Internal Controls, Financial Reporting, Document Retention, and Auditing Principle](#)
- ▶ [Financial Reporting Policy](#)
- ▶ [Internal Controls Policy](#)
- ▶ [Tax Policy](#)
- ▶ [Sourcing 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.

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:

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



Discrimination

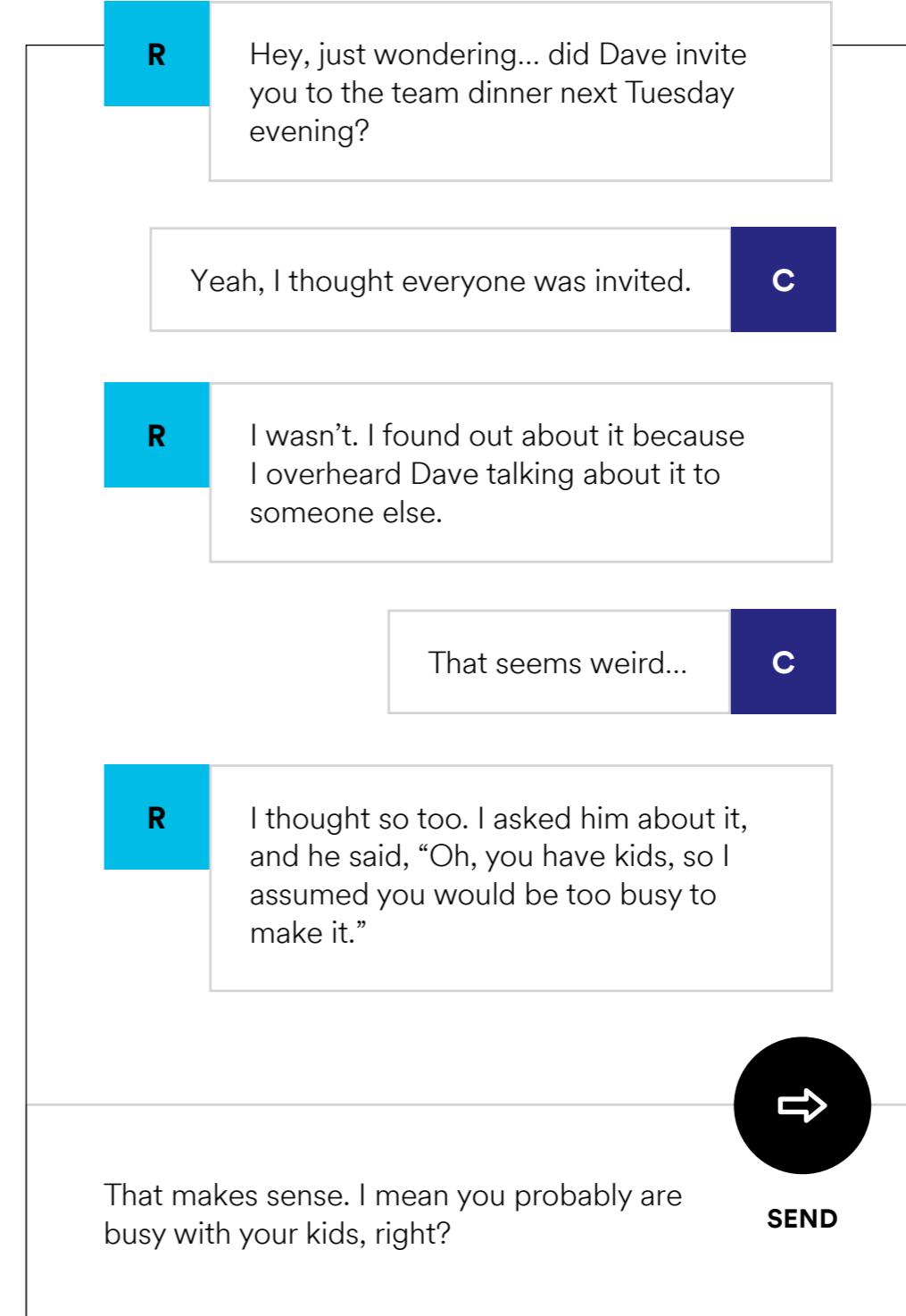
We all bring a variety of backgrounds and experiences to work with us, and that diversity is part of what makes 3M successful. To support and uphold our commitment to diversity, we all have a responsibility to demonstrate respect and create an inclusive environment in the workplace. Accordingly, we never tolerate unlawful discrimination based on any protected characteristics. Protected characteristics may vary around the globe, but at 3M they generally include:

- ▶ Race or color
- ▶ Age
- ▶ Gender
- ▶ Creed
- ▶ National origin
- ▶ Disability
- ▶ Religion
- ▶ Sexual orientation
- ▶ Sex
- ▶ Gender identity
- ▶ Marital status
- ▶ Pregnancy
- ▶ Genetic information
- ▶ Citizenship Status
- ▶ Other characteristics as protected by law

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

Example

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.



R Hey, just wondering... did Dave invite you to the team dinner next Tuesday evening?

C Yeah, I thought everyone was invited.

R I wasn't. I found out about it because I overheard Dave talking about it to someone else.

C That seems weird...

R I thought so too. I asked him about it, and he said, "Oh, you have kids, so I assumed you would be too busy to make it."

SEND

Harassment and Disrespectful Behavior

Our actions and the way we treat one another are key to creating a productive and inclusive workplace. 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.

For more information, see the following resources:

- ▶ [Respectful Workplace Principle](#)
- ▶ [Non-Retaliation Policy](#)
- ▶ [Human Rights Standard](#)

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.

Example

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.

Example

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.

Example

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

For more information, see the following resources:

- ▶ [Workplace Environmental, Health and Safety Principle](#)
- ▶ [Safety and Health 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. Click each icon below to learn more about each initiative.

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 increasing diversity in our organization around the world is a core part of our sustainability strategy.

For more information, see the following resources:

- ▶ [Responding to Customer Sustainability-Corporate Governance Requests Policy](#)
- ▶ [Sustainability 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.

Example

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?

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

Leaving work for a volunteer “meet and greet” is not permitted.

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

For more information, see the following resources:

- ▶ [Charitable Contributions Standard](#)



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