

## **Contingent Workforce Anti-Bribery Policy**

### **Introduction**

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

This policy prohibits bribery and imposes mandatory due diligence, internal approvals, books and records entries, and document retention requirements in six key areas related to Government Officials. It also requires audits to help ensure compliance, as well as appropriate scrutiny of acquisition and joint venture target companies that have had foreign government sales and other significant governmental interaction. (Receiving or offering gifts, travel or anything of value to a third party who are not Government Officials must comply with the Business Gifts and Entertainment Policy). See the 3M Administration Team for additional information on this policy.

A "Government Official" is:

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

A "bribe" is the offering, authorizing or giving of anything of value to a Government Official directly or indirectly with the intent to obtain or retain business or gain an improper advantage. An "improper advantage" is broadly defined to mean something to which the company is not clearly entitled, such as a price increase approval, favorable product specification selection, contract award, grant of operating permits, product use/registration approval, favorable court decision, or tax dispute settlement.

### **Policy statement**

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

### **What it means**

3M requires that contingent workers:

- Not engage in acts or omissions that offer, authorize or give a bribe to a Government Official, or create the impression that a bribe has been offered, authorized or given;
- Take affirmative steps to prevent those doing business directly or indirectly before a Government Official on 3M's behalf from engaging in bribery;
- Adhere to 3M's mandatory due diligence, internal approval, financial reporting, and document retention requirements in the six key areas listed below.
- Scrutinize activities of certain acquisition targets and joint venture partners to identify and address potential bribery issues;
- Promptly report to 3M any suspected violations by 3M employees, contingent workers or others doing business before a Government Official on 3M's behalf; and
- Cooperate with audits of 3M's businesses.

### **Six Key Areas**

In addition to those obligations set forth above, 3M requires that contingent workers work with 3M's Administration Team to conduct specific due diligence, obtain internal legal and business approvals, ensure accurate financial reporting, and adhere to required document retention requirements in six key areas:

1. 3M sponsorship of any travel-related benefits for any Government Official

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

**What to Avoid**

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

If additional information regarding 3M's Anti-bribery Policy is required, please contact the 3M Relationship Management team.

This policy has been reviewed with me, and I will comply.

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(Signature)

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04/20/2022

(Date)