

# Antitrust and Competition Law Policy

## ***Policy Statement***

It is 3M policy to engage in fair competition, in compliance with antitrust and competition laws globally. Because antitrust and competition laws are not identical in every country, it is important that 3M employees consult their assigned 3M legal counsel whenever their business activities might be regulated by these laws. Failure to comply with these laws could lead to criminal and civil penalties, significant business disruptions and harm to 3M's reputation.

## ***What it means***

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

## ***What to avoid***

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

- Reaching an understanding or agreement with a competitor to restrain trade, for example, by fixing prices, allocating customers or coordinating bidding activities.
  
- Reaching an understanding or agreement with other companies that requires 3M not to do business with another company, for example, an agreement with major distributors not to do business with a discounting distributor.

- Abusing a large market-share position by engaging in below-cost pricing in order to harm competitors.