

Securities Trading and Insider Information Policy

Policy statement

It is 3M policy that employees and others acting on 3M's behalf must not disclose material, non-public information, or, while knowing material, non-public information about 3M or another company, purchase or sell securities (e.g., stock, bonds or options) of 3M or the other company. In addition, senior 3M executives must strictly comply with Securities and Exchange Commission rules restricting their ability to trade in 3M securities.

What it means

- Generally, any information that an investor might use to decide whether to buy, sell or hold securities is material information. This includes:
 - Company or business unit financial results.
 - Earnings per share.
 - Any change in the payment of dividends.
 - Possible mergers, acquisitions, divestitures or joint ventures.
 - Major litigation.
 - Significant product development.
- Information is non-public until it has been disclosed to the investing public through established news services, such as Dow Jones News Services, and sufficient time has passed to allow the information to be disseminated through the trading markets, typically 48 hours after the release of the information.
- Violations of this policy could also lead to fines and criminal penalties against individual securities traders and the company.

What to avoid

- Buying or selling stock or other securities of any company while you are in possession of material, non-public information concerning that company.
- Disclosing material, non-public information about a company to any other person, including family members, friends or colleagues, where the information may be used by the other person to profit by trading in the company's securities.

- Recommending or suggesting that anyone else buy, sell or retain the stock or other securities of any company while you have material, non-public information about the company.
- Providing access to material non-public information when it does not meet the strict need-to-know requirement.