

Lobbying Policy

Policy statement

Lobbying is a normal, acceptable and useful part of the legislative process, provided it is conducted in compliance with all applicable legal requirements. Proper lobbying activities can educate lawmakers about 3M's legitimate interests. Laws and regulations governing lobbying or attempts to influence government officials vary around the world. It is 3M policy to strictly comply with all lobbying laws and regulations wherever 3M does business.

What it means

- In the United States, 3M employees or others acting on 3M's behalf who contact federal, state or local government officials or employees to influence legislation or regulations may be engaged in regulated lobbying activities. Check with your assigned 3M legal counsel to determine whether a potential contact with government personnel constitutes lobbying, unless your contact has been suggested in an authorized 3M publication, such as *Government Compass*.
- Follow the procedures established by the 3M Office of General Counsel, Accounts Payable and the Tax Department to comply with federal, state and local laws pertaining to registration and reporting of lobbying efforts.
- Coordinate all contacts with government elected officials and government personnel (and contracts for lobbying consultants) on behalf of 3M with:
 - Corporate Public Relations and State and Local Government Affairs Department for contacts with state or local governments.
 - The 3M Federal Government Affairs Department for contacts with the federal government.
- Lobbying laws do not apply to individual political expression that is not on behalf of 3M. You can work to influence legislative bodies relating to issues of personal concern. Just make sure you don't mention 3M or use any company resources (letterhead, e-mail accounts, etc.) that might give the appearance you are acting on 3M's behalf.

What to avoid

Discussions on 3M's behalf about legislation, rulemaking or policy development with elected officials or administrative employees, unless you are a registered lobbyist or have prior review and approval from your assigned 3M legal counsel.