

# Hiring Former and Current Government Employees and Consultants Policy

## ***Policy statement***

It is 3M policy to comply with all laws concerning the recruitment and employment of former and current government employees, either as employees or consultants. 3M employees must obtain prior clearance to discuss or offer employment to or consulting by former or current government employees.

In the United States, these laws and regulations vary according to the employment status of U.S. government employees (whether active or retired), the functions they performed, their business relationships with 3M when they were government employees, and how long it has been since they left government employment. Each situation must be considered on a case-by-case basis. Many other countries also have laws that regulate the hiring, as employees or consultants, of former or current government employees.

## ***What it means***

- Obtain prior clearance from 3M Human Resources before discussing possible 3M consulting or employment, or making offers to hire:
  - Any current or former U.S. government employee (military or civilian) or federal legislator.
  - Any current state or local government employees, legislators or members of their immediate families who could direct or influence (a) the regulatory or contractual treatment of 3M in any pending matter, or (b) the purchase of 3M goods or services by state or local government agencies, or (c) the enforcement of state or local government laws affecting 3M in any pending matter.
  - Any current or former state or local government employees or legislators (or members of their immediate families) who are not currently, but have been within the last two years, in positions where they could direct or influence either the purchase of 3M goods or services by state or local government agencies or the adoption or enforcement of state or local government laws affecting 3M in any pending matter.
- Postpone any discussions about possible 3M employment or consultant relationships that are initiated by current or former international, U.S., state or local government employees or legislators until it is determined that such discussions are legally permitted.

- Former international or U.S. Government employees or legislators who become 3M employees or consultants must follow all government conflict of interest (“revolving door”) laws applicable as a result of their former government employment. Generally speaking, this means that they must avoid involvement with any 3M matter in which they were significantly involved while employed by the government.
- Many countries outside the U.S. have laws regulating the hiring, as employees or consultants, of former or current government employees. Assigned 3M legal counsel must be consulted prior to contacting former or current government employees regarding employment as 3M employees or consultants.

### ***What to avoid***

- Employment discussions with former or current international, U.S., state or local government employees, legislators, or members of their immediate families, whether initiated by you or them, unless you have approval from 3M Human Resources, after its consultation with assigned 3M legal counsel.