

Harassment Policy

Policy Statement

3M employees and others acting on 3M's behalf are entitled to respectful treatment in the 3M workplace. Being respected means being treated honestly and professionally, with your unique talents and perspectives valued. A respectful workplace is about more than compliance with the law. It is a working environment that is free of inappropriate behavior of all kinds and harassment because of age, disability, marital status, race or color, national origin, religion, sex, sexual orientation or gender identity.

What it means

A respectful workplace

3M is committed to providing a workplace in which the dignity of every individual is respected. Each of us should understand that incidents of harassment and inappropriate behavior will not be tolerated at 3M.

Harassment

Harassment is unwelcome conduct toward an individual because of his or her age, disability, marital status, national origin, race or color, religion, sex, sexual orientation or gender identity, when the conduct creates an intimidating, hostile or offensive work environment that:

- Causes work performance to suffer; or
- Negatively affects job opportunities.

Harassment is against the law in the United States and many other countries. Examples of harassment that may violate the law and will violate this policy include:

- Oral or written communications that contain offensive name-calling, jokes, slurs, negative stereotyping, or threats. This includes comments or jokes that are distasteful or targeted at individuals or groups based on age, disability, marital status, national origin, race or color, religion, sex, sexual orientation or gender identity.
- Nonverbal conduct, such as staring, leering and giving inappropriate gifts.
- Physical conduct, such as assault or unwanted touching.
- Visual images, such as derogatory or offensive pictures, cartoons, drawings or gestures. Such prohibited images include those in hard copy or electronic form.

Sexual harassment

Sexual harassment is a form of harassment that is based on a person's sex or that is sex-based behavior. It is also sexual harassment for anyone in a position of authority to tie hiring, promotion, termination or any other condition of employment to a request or demand for sexual favors. Although having a consensual romantic relationship with another 3M employee is not harassment, harassment may occur as a result of the relationship if either person in the

relationship engages in conduct in the workplace that is inappropriate or unwelcome. Employees in consensual romantic relationships also must comply with the *3M Conflict of Interest Policy*.

Inappropriate behavior

Our goal is to have a work environment where we all treat each other respectfully and professionally. Any unprofessional or disrespectful behavior, even if not illegal, interferes with that goal and will not be tolerated. 3M reserves the right to respond to inappropriate behavior even where no one has complained or indicated they have been offended.

Performance feedback is not harassment or inappropriate behavior

Effective leadership requires that managers talk with their employees about their job performance. Managers should be clear about how each employee is performing and how the employee's overall behavior contributes to the workgroup's ability to deliver results consistent with 3M's values. Such discussions may be difficult and they always should be done professionally and respectfully. However, constructive criticism and supervisory actions regarding performance deficiencies or other workplace issues are not harassment or retaliation.

Every 3M employee has a role to play in achieving a respectful workplace

- 3M expects respectful and professional behavior at all times, no matter the situation. Remember that your actions reflect upon you, and potentially reflect upon 3M. Be sensitive to how others may perceive your actions. Just because someone does not complain to you does not mean that they do not object to your behavior.
- There is no reason to ever engage in unwelcome behavior that has the purpose or effect of harassing others. Report any unwelcome behavior you think might be harassment under this policy.
- Be open to constructive feedback regarding performance deficiencies. Recognize that respectful supervisory actions regarding workplace issues are a necessary and appropriate step in performance feedback.
- If someone offends you, let that person know so that it won't happen again. If you have offended someone, understand his or her perspective, apologize and do not let it happen again.
- If you are aware of any behavior that might violate this policy, report it to your manager or supervisor or to the 3M Human Resources Department.

What to avoid

- Any behavior that is unprofessional or disrespectful, or that has the purpose or effect of harassing anyone.
- Any retaliation against someone who raises a concern or potential violation under this policy.

- Missed opportunities to respectfully communicate to someone that you found his or her behavior offensive.
- Unreported concerns or violations of this policy.

How to report a violation

Most reports of suspected violations of this policy are made to 3M Human Resources. You can contact your local Human Resources Manager, or go to someone higher in the Human Resources organization. You can also use any of the additional reporting options listed in the *If You Have a Business Conduct Concern* section of this manual, if you prefer.

How 3M will respond

Investigation and response

If you report a complaint of harassment or inappropriate behavior, 3M will investigate your concerns. Where there has been a violation of policy, 3M will take appropriate action to try to avoid future violations. In appropriate cases, 3M may take disciplinary action (up to and including termination) against those violating the *3M Harassment Policy*.

3M will inform parties about the status of reviewing their complaints. To respect the privacy and confidentiality of all people involved, 3M may not share specific details of the discipline or other action taken.

3M management responsibility

Every 3M supervisor and manager is responsible for ensuring that 3M provides a workplace free of harassment and inappropriate behavior and that complaints are handled promptly and effectively. With the assistance of Human Resources, 3M management must inform their organizations about the policy, promptly investigate allegations of harassment, take appropriate disciplinary action, and take steps to assure retaliation is prohibited.

Retaliation is prohibited

This policy strictly prohibits any retaliation against an employee or other person who reports a concern about harassment or other inappropriate behavior.