

Conflict of Interest Policy

Policy statement

It is 3M policy that employees and others acting on 3M's behalf must be free from conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the company in conducting 3M business activities and assignments. The company recognizes that employees may take part in legitimate financial, business and other activities outside their 3M jobs, but any potential conflict of interest raised by those activities must be disclosed promptly to management.

What it means

- Request management approval of outside activities, financial interests or relationships that may pose a real or potential conflict of interest. Remember that management approval is subject to ongoing review, so you need to periodically update your management on your involvement.
- Avoid personal relationships with other 3M employees where parties in the relationship may receive or give unfair advantage or preferential treatment because of the relationship.
- Avoid actions or relationships that might conflict or appear to conflict with your job responsibilities or the interests of 3M.
- Even the appearance of a conflict of interest can damage an important company interest.
- Obtain necessary approvals before accepting any position as an officer or director of an outside business concern.
- Contact the director of Community Affairs (in the United States) or your human resources manager (in other countries) and notify your management prior to serving on the board of directors of a bona fide charitable, educational or other nonprofit organization.

What to avoid

- Working with a business outside your 3M responsibilities that is in competition with any 3M business.
- Accepting a gift that does not meet the standards in the *3M Business Gifts and Entertainment Policy*.

- Having a direct or indirect financial interest in or a financial relationship with a 3M competitor, supplier or customer (except for insignificant stock interests in publicly-held companies).
- Taking part in any 3M business decision involving a company that employs your spouse or family member.
- Having a second job where your other employer is a direct or indirect competitor, distributor, supplier or customer of 3M.
- Having a second job or consulting relationship that affects your ability to satisfactorily perform your 3M assignments.
- Using nonpublic 3M information for your personal gain or advantage, or for the gain or advantage of another, including the purchase or sale of securities in a business 3M is interested in acquiring, selling or otherwise establishing or terminating business relations with.
- Investing in an outside business opportunity in which 3M has an interest, except for having an insignificant stock interest in publicly-held companies.
- Receiving personal discounts or other benefits from suppliers, service providers or customers that are not available to all 3M employees.
- Receiving personal honoraria for services you perform that are closely related to your work at 3M. Your supervisor should approve occasional honoraria, such as for a university presentation or symposium.
- A romantic relationship between 3M employees who have a direct or indirect reporting connection, where the relationship may lead to loss of trust and confidence in the objectivity of the supervising employee.