

## Non-3M Workforce Policies

1. Non-3M Workforce Ethical Business Conduct Policy
2. Non-3M Workforce Harassment Policy
3. Non-3M Workforce Violence Prevention Policy
4. Non-3M Workforce Drug and Alcohol Policy
5. Non-3M Workforce Electronic Resources Policy

## Non-3M Workforce Ethical Business Conduct Policy

Ethical business conduct sometimes requires more than strictly complying with the law. In many cases, there are no laws governing many business activities. Even when laws apply, sometimes they set a standard of behavior that is unacceptably low for 3M. When confronted with such instances, an ethical decision must be made that reflects well upon 3M.

Your actions should be guided by 3M's fundamental values of uncompromising integrity and honesty. These values include promise keeping, fairness, respect and concern for others, and personal accountability.

Ethical decision-making requires evaluating and giving due consideration to alternative courses of conduct in light of these corporate standards:

- Show uncompromising honesty and integrity in all of your 3M activities and relationships.
- Avoid all conflicts of interest between work and personal life.
- Respect the dignity and worth of all individuals.
- Encourage individual initiative and innovation in an atmosphere of flexibility, cooperation and trust.
- Promote a culture where promise keeping, fairness, respect and personal accountability are valued, encouraged and recognized.
- Create a safe workplace.
- Protect the environment.

As a non-3M worker, you should be able to answer "yes" to the following questions with regard to any action taken as part of your 3M assignment.

- Is this action consistent with 3M's corporate values of uncompromising honesty and integrity?
- Can this action withstand public scrutiny?
- Will this action protect 3M's reputation as an ethical company?

If you can't answer "yes" to all these questions, but still believe the proposed action may be unlawful or unethical, you should review the proposed action with your 3M contact because it may not be in the best interest of 3M to proceed.

If it is determined that you acted unethically or otherwise contrary to 3M's policies or corporate values, it may result in the end of your assignment at 3M.

This policy has been reviewed with me, and I will comply.

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(Signature)

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(Date)

## Non-3M Workforce Harassment Policy

All individuals who are a part of 3M's workplace are entitled to respectful treatment. A respectful workplace is about more than compliance with the law. It is a work environment 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.

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 while on assignment at 3M.

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* 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 person at 3M 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.

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.

Every non-3M worker 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, your employer, 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.
- 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 immediately to your 3M contact and your employer – the non-3M workforce supplier.

## 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 Complaint

You should report suspected violations of this policy to your 3M contact *and* your employer – the non-3M workforce supplier. If your 3M contact is involved in the suspected violation, you should report your concerns to your employer *and* the 3M Business Conduct office at 1-877-3M-ETHICS or 3M-Ethics.com.

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

3M will inform parties as appropriate about the status of reviewing their complaints. To respect the privacy and confidentiality of all people involved, 3M may not share specific details of any discipline or other action taken. This policy strictly prohibits any retaliation against anyone, including a non-3M worker, who reports a concern about harassment or other inappropriate behavior.

If a non-3M worker violates this policy, it may result in the end of the assignment at 3M.

This policy has been reviewed with me, and I will comply.

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(Signature)

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(Date)

## **Non-3M Workforce Violence Prevention Policy**

3M desires to provide a safe, productive, and secure work environment for all individuals who do business with 3M. 3M will not tolerate acts or threats of intimidation or physical violence at any time while performing work as part of your 3M assignment, while on 3M premises, or while utilizing 3M communications equipment.

Behavior prohibited under this policy includes, but is not limited to, the following:

- Physically harming, or attempting to harm another or oneself;
- Threatening to physically harm another or oneself;
- Threatening behavior, such as intimidation, bullying, coercion, stalking or other forms of intimidating behavior, including behaviors that would violate 3M's Non-3M Worker Harassment Policy.
- Acts related to domestic violence on 3M premises;
- Shoving, pushing, grabbing and other forms of nonconsensual physical contact;
- Bringing any weapon into the workplace;
- Intentionally damaging 3M property or property of others on 3M premises;
- Any other statement or conduct that would cause a reasonable person to believe violence or injury may occur.

### **Reporting Obligations**

All non-3M workers have an obligation to help maintain a safe, productive and secure work environment and are required to report any violation of this policy immediately to 3M security or their 3M contact. Failure to do so may result in the end of assignment and/or a loss of the 3M business relationship.

If a non-3M worker encounters or observes intimidating behavior or physical violence in the workplace, the individual should avoid confrontation. In the instance of physical violence, proceed to a safe location. In all instances, report the incident to 3M security or your 3M contact immediately. If immediate law enforcement assistance is needed, the individual should contact law enforcement, then 3M security or 3M contact.

### **Restraining Orders**

All non-3M workers with unescorted access to 3M facilities who apply for or obtain a protective or restraining order (issued by a court or other governmental authority) that would encompass 3M premises must present to 3M security copies of (1) any petition or declaration seeking the order, (2) proof of service of the order, and (3) the actual order issued by the court or other governmental authority. A restraining order is a type of order issued by a court or other government agency against someone and which places restrictions on that someone's ability to have contact with another person or persons.

### **How 3M Will Respond**

Reports of conduct prohibited under this policy will be investigated promptly. Information that is reported or discovered during the investigation, as well as the resolution will be communicated only to those who have a business need to know. Retaliation or reprisal toward anyone who reports a suspected violation of this policy is prohibited.

If a non-3M worker violates this policy, it may result in the end of the assignment at 3M.

This policy has been reviewed with me, and I will comply.

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(Signature)

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(Date)

## **Non-3M Workforce Drug and Alcohol Policy**

3M desires to provide a safe, productive, and secure work environment for all individuals who do business with 3M. A productive and safe work environment requires that the people in it are physically and psychologically able to do their work safely and effectively. Drug or alcohol abuse in the workplace may endanger the safety of individuals in the work environment.

### **Drugs and Alcohol**

During the workday, in the workplace, or anytime when 3M business is being conducted, 3M prohibits:

- Buying, selling, using, manufacturing, dispensing, distributing or possessing illegal drugs,
- Selling, purchasing, or sharing prescription medications in the workplace,
- Using, dispensing, distributing, or possessing prescription medications without a valid prescription,
- Possessing drug paraphernalia,
- Using non-prescription inhalants, and
- Having illegal drugs in your system while at work.
- Using alcohol
- Selling or purchasing alcohol in the workplace, and
- Having alcohol in your system while at work.

### **Certain Definitions**

Alcohol is defined as any fermented or distilled beverage containing ethanol, which includes but is not limited to any alcoholic drink such as hard liquor, wine, and beer.

A drug is any substance used outside of prescribed medical direction for the primary purpose of altering moods, behavior, consciousness, or performance. Drugs may include but are not limited to non-prescription inhalants, prescription medications without a valid prescription, marijuana, and other illegal drugs. This definition excludes commonly consumed foods such as chocolate and caffeinated beverages. A non-prescription Inhalant is a medicine or other inhaled substance used for purposes other than prescribed medical use.

The workday includes any period of time when a non-3M worker is working on behalf of 3M. This includes personal time such as lunch and breaks. The workplace includes 3M property (including 3M motor vehicles) or any place where 3M work is being performed off 3M property.

### **Over-the-Counter and Prescription Medications**

When non-3M workers use over-the-counter medications or prescription medications that may cause safety risks, they are encouraged to confer with their physician and must inform their 3M contact of safety considerations. You are not expected to name the medication. If there is a concern that you will not be able to perform your job duties in a productive, effective and safe manner, you must contact your employer – the non-3M workforce supplier – and discuss the situation with them. It is your employer's responsibility to confer with the 3M contact regarding possible alternative work. 3M in its sole discretion reserves the right to end the assignment due to safety or other legitimate business considerations.

### **Drug and Alcohol Testing**

The non-3M worker's employer – the non-3M workforce supplier – may conduct the drug or alcohol testing in compliance with applicable laws and in accordance with any 3M supplier guidelines or

contractual requirements. Generally speaking, the non-3M workforce supplier will conduct testing prior to the 3M assignment to determine eligibility to provide services for 3M or during the assignment under limited circumstances, such as when there is a reasonable suspicion of drug or alcohol use in violation of this policy. The non-3M workers should confer with his or her employer regarding any drug or alcohol testing policies and procedures that may apply. The outcome (pass or fail) of any drug and alcohol testing conducted in connection with a 3M assignment may be shared with the Non-3M Workforce Administration Team, but the Non-3M workforce supplier will keep documentation of results and is responsible for ensuring that any testing complies with any applicable laws or regulations.

If the non-3M worker refuses to take a drug or alcohol test as and when requested pursuant to this policy, or interferes with any required testing, that person will no longer be eligible for assignment at 3M.

### **Non-3M Worker Responsibility**

All non-3M workers are responsible for helping maintain a productive and safe work environment. It is your responsibility to ensure that this policy is enforced. 3M requires that all non-3M workers:

- Comply with the Non-3M Worker Drug and Alcohol Policy,
- Comply with the Federal Drug-Free Workplace Act (see below),
- Report concerns arising under this policy to your employer and your 3M contact,
- Not retaliate against anyone who reports or helps confirm a suspected violation,
- Report to your employer and your 3M contact any use of an over-the-counter or prescription medication that may impair your ability to safely perform your job duties.

### **3M Vehicles**

Any non-3M worker who is convicted of or pleads guilty to driving while intoxicated, driving under the influence, refusing to take a sobriety test, or committing a similar offense involving a 3M motor vehicle or personal vehicle while being used for 3M business purposes will be ineligible for assignment at 3M. 3M may refer evidence obtained to law enforcement agencies when it is appropriate to do so.

### **Policy Violations**

Appropriate action will be taken if a non-3M worker violates this policy or fails a required drug and alcohol test. Where permitted by applicable law or regulation, such action may include immediate termination of the 3M assignment.

### **Compliance with the Federal Drug-Free Workplace Act**

As a condition of assignment, non-3M workers must report any conviction under a federal or non-federal criminal drug statute for violations occurring on 3M premises, or on any site where work is being performed under a government contract subject to the Drug-Free Workplace Act, or while conducting 3M business. A report of a conviction must be made to your employer – the non-3M workforce supplier – and the 3M contact within five days of the conviction.

This policy has been reviewed with me, and I will comply.

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(Signature)

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(Date)

Last update: Oct 31, 2008

## Non-3M Workforce Electronic Resources Policy

3M's electronic resources provide access to information and are critical to a productive work environment. The efficient and appropriate use of 3M electronic resources contributes to 3M's business success. Electronic resources provided by 3M are to be utilized in ways that adhere to the law and 3M's policies. Non-3M workers must avoid exposing 3M electronic resources, either purposefully or inadvertently, to unintended or unauthorized uses or security threats.

3M electronic resources include all electronic devices, software, systems and networks, accessed directly or through a third party, used to transmit, receive, process or store 3M information or data. 3M electronic resources include, but are not limited to, computers, servers, databases, PDAs, telephones, wireless devices, e-mail systems, voice messaging systems, and Internet connectivity. It also includes the use of electronic resources not owned by 3M that store or connect to 3M data. This policy applies whenever and wherever 3M electronic resources are accessed and used.

3M reserves the right to monitor or access non-3M worker communications or other materials created, received, stored, transmitted or processed using 3M electronic resources, at any time and without notice, where there is business justification to do so and as permitted by law. For this reason, users of 3M electronic resources should not have an expectation of privacy in e-mails, documents, files, voice files or other communications or materials created, received, stored, transmitted or processed using 3M electronic resources, unless required by law.

□ Use 3M electronic resources in accordance with 3M policies and applicable laws, including 3M policies and laws regarding information security, confidential information, privacy, harassment, software implementation, record retention, etc. For example, avoid:

- Using 3M electronic resources in a manner that violates any law or 3M's Non-3M Workforce Ethical Business Conduct Guidelines.
- Using 3M electronic resources in a manner inconsistent with a respectful business environment or which violates 3M's Non-3M Workforce Harassment Policy; for example, by sending offensive or harassing messages or downloading or viewing sexually explicit or other offensive material.
- Using 3M electronic resources for outside business ventures, personal financial gain, etc.
- Downloading, copying, or using software or other materials in violation of copyright laws or license restrictions.
- Posting a list of passwords next to your workstation.
- Disabling any 3M-required software.
- Using the 3M email system to send personal photos or other large non-business files which can negatively impact 3M network operations.
- More than occasional, brief personal use of 3M electronic resources, and avoid use that interferes with normal business activities or your ability to meet assignment expectations.

□ Take appropriate measures to protect the security, confidentiality and integrity of 3M electronic data and information, as required under 3M policies and applicable laws. For example:

- Protect User IDs (UPINs) and passwords for 3M electronic resources and ensure their proper use. Passwords are confidential information.
- Ensure that your workstation and mobile devices connecting to 3M networks meet corporate standards. Do not uninstall or disable 3M-provided security solutions, such as anti-virus tools, firewalls or password-protected screensavers.
- Lock workstations when left unattended.
- If using 3M electronic resources in public places, take appropriate measures to protect 3M confidential information. For instance, when using a laptop computer for 3M business on airplanes or in hotel lobbies, use a supported privacy screen filter.
- Use only properly licensed copies of computer software. Do not copy or use software licensed to 3M unless 3M's license from the software publisher permits copying or use.

If a non-3M worker violates this policy, it may result in the end of the assignment at 3M.

This policy has been reviewed with me, and I will comply.

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(Signature)

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(Date)

Last update: Oct 31, 2008