

Export, Import and Trade Compliance

Policy Statement

It is 3M policy to comply with all applicable export, import and trade compliance laws in all countries in which 3M does business.

What it means

Trade Control Laws Generally

- Follow all applicable trade control laws and regulations of all countries in which you conduct business.
- Follow 3M trade compliance policies and standards, and engage the 3M Trade Compliance Department and 3M International Business Development Department as directed by those standards.
- 3M's Trade Compliance Department in St. Paul, after review by 3M's Office of General Counsel in St. Paul, must assess and submit any trade compliance-related disclosures to the U.S. Government or any government entity located in the United States. Contact your assigned 3M counsel to discuss any matter of concern and relay appropriate issues to 3M's Trade Compliance Department in St. Paul or Office of General Counsel in St. Paul.

Export Control Laws

- Comply with all applicable U.S. export control laws and those of the countries in which you do business.
- Consult with 3M's Trade Compliance Department in St. Paul and your assigned 3M legal counsel about export control laws in your country, as well as applicable U.S. export control laws, that may control not only the export of products, technology, services, software, spare parts and equipment physically across borders, but also (i) the sharing of export-controlled technology, services, and equipment within your country to those who are not citizens of your country, and (ii) the reexport from your country of export-controlled items, technology or services.
- With respect to doing business of any kind with or related to countries subject to embargos or other comprehensive trade sanctions under 3M's trade compliance policies, 3M's businesses must obtain prior legal review and business executive review before commencing any business activity in those countries or with government officials/interests/citizens of those countries .
- Comply with the export control plans established by your division, laboratory, staff group or subsidiary.
- Only 3M's Trade Compliance Department in St. Paul and those it expressly designates are authorized by 3M to apply to the U.S. Government for U.S. export control authorization, including U.S. export control licenses and re-export

authorization. Contact 3M's Trade Compliance Department in St. Paul to discuss your requirements or concerns.

- If you are granted an export license, work with 3M's Trade Compliance Department to develop an effective control plan for adhering to license restrictions and reporting requirements.

Importation, Country of Origin and Marking Laws

- Follow all applicable U.S. and local country Customs and import laws and regulations, including those requiring accurate documentation, country of origin markings, classification of the goods, and proper valuation declarations, including those of non-cash value (such as tooling and components).
- Seek the advice and guidance of your local assigned import manager or 3M's Trade Compliance Department in St. Paul when participating in any special duty reduction programs, such as those under free trade agreements (NAFTA, CAFTA, etc.), bonded warehouses, temporary importations under bond, bonded books, duty drawback, etc.
- Direct all correspondence with local Customs authorities through your local 3M import manager or 3M's Trade Compliance Department in St. Paul.

Anti-Boycott Laws

- Never cooperate with any restrictive trade practice or boycott that is prohibited by U.S. or applicable local laws. An "illegal boycott request" under U.S. law is any request from a third party to take any of the following described actions against countries friendly to the U.S., including but not limited to Israel:
 - ❑ Refusal to do business with or in Israel, or with other persons or entities that do business in or with Israel, or other countries friendly to the U.S.;
 - ❑ Furnishing information about business relationships with or in Israel;
 - ❑ Discriminating against someone based on race, religion, sex, national origin except in cases where such information is related to valid government documents such as visas; or
 - ❑ Executing business documents such as contracts, letters of credit, warranties that contain illegal boycott requests (such as prohibiting Israeli product content, product delivery through Israel, Israeli business dealings, etc.).
- To comply with U.S.-required boycott reporting regulations, all boycott requests received by 3M must be immediately reported to your company's assigned export control/anti-boycott coordinator or to 3M's Trade Compliance Department in St. Paul.

What to avoid

- Providing any certifications or representations of the country of origin of a product without prior written approval from 3M's Trade Compliance Department.
- Transferring any export-controlled items or technology or services without the required export authorization.

- Approving or making any U.S. export control representations or certifications in any type of agreement or other document without prior review of 3M's Office of General Counsel in St. Paul.
- Providing inaccurate, incomplete or unsubstantiated invoice or import documentation, including those related to product description, classification, valuation, country of origin or quantity.
- Completing Free Trade Agreement Country of Origin certifications without proper back up documentation and complete analysis.
- Not reporting amendments to Customs declarations for pricing adjustments, indirect payments, or credits received.
- Storing export-controlled technology on electronic databases or in other locations without access controls.