

Anti-Bribery

Policy statement

It is 3M policy to comply with all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and all applicable local laws where 3M operates, and to accurately reflect all transactions on 3M's books and records. It is also 3M's policy to require those agents, consultants and business partners who work on 3M's behalf before Government Officials to comply with these same laws and practices.

What it means

3M requires that:

- Its employees not engage in acts or omissions that offer, authorize or give a bribe to a Government Official, or create the impression that a bribe has been offered, authorized or given;
- Its employees take affirmative steps to prevent those doing business directly or indirectly before a Government Official on 3M's behalf from engaging in bribery;
- Its employees adhere to 3M's mandatory due diligence, internal approval, financial reporting, and document retention requirements in the six key areas listed below and as fully set out under the topic "Anti-Bribery" on 3M's Legal Center.
- Its employees scrutinize activities of certain acquisition targets and joint venture partners to identify and address potential bribery issues;
- Its employees promptly report to 3M any suspected violations by 3M employees or others doing business before a Government Official on 3M's behalf; and
- Its auditing function audit 3M's businesses as appropriate for potential bribery activities and risks.

Six Key Areas

In addition to those obligations set forth above, 3M requires specific due diligence, internal legal and business approvals, financial reporting, and document retention requirements in six key areas:

1. 3M sponsorship of any travel-related benefits for any Government Official
2. Gifts to, entertainment for, or charitable contributions on behalf of any Government Official
3. Use of consultants and sales agents who may interact with Government Officials on 3M's behalf
4. Facilitating or "grease" payments to any Government Official
5. Activities with certain business partners who may interact with Government Officials directly or indirectly on 3M's behalf
6. Political contributions to any Government Official, political party, candidate or political organization

3M employees can access these Mandatory Operational Standards and related tools on the 3M Legal Center Intranet site, under the topic “Anti-Bribery”.

What to Avoid

- The direct or indirect provision of cash or anything of value to a Government Official to obtain an unfair business advantage or to obtain or retain business.
- Authorizing or providing travel benefits, gifts, entertainment, or political contributions for the benefit of a Government Official without the required due diligence assessment and internal 3M business and legal approvals.
- Entering into a consultant or sales agent agreement that will result in contacts with Government Officials without conducting due diligence, obtaining the required internal business and legal approvals, retaining all due diligence for eight years, and accurately recording on 3M's book and records all related payments.
- Making any "grease" or facilitating payments without obtaining the required 3M internal business and legal approvals.
- Making any incomplete, false or inaccurate entries on 3M's books and records.