



## *Company & Culture*

# Ethics & Compliance

Code of Conduct

Compliance Principle Translations

## Compliance Principle

### **Principle Statement:**

Employees and any third party to which this Principle applies, must obey the law and 3M's Code of Conduct. 3M can be held responsible for the wrongdoing of others acting on its behalf. 3M employees must not knowingly allow a business partner or a third party to engage in illegal activities and should ask questions and take steps to prevent such wrongdoing.

### **Purpose:**

3M enjoys a global reputation as an ethical and law-abiding company, one that does business with uncompromising honesty and integrity. Because 3M is a global company, 3M employees must obey all of the laws that apply to 3M, wherever they live and work. 3M's Code of Conduct often sets a higher standard than what the law requires and 3M employees must comply with 3M's Code of Conduct, in addition to the law. 3M employees are expected to live 3M values.

This Principle applies globally to all employees and may apply to third parties acting on behalf of 3M.

### **Additional Guidance:**

- Examples of people or entities who are not 3M employees but who may act on behalf of 3M include distributors, suppliers, customers, sales agents, representatives, consultants, contract laborers, joint venture partners, converters, and outside counsel. 3M's business relationship with a third party will determine if a third party acts on behalf of 3M. Where that is the case, that third party must follow the relevant policies in 3M's Code of Conduct. 3M expects that all third parties that act on 3M's behalf will follow all applicable laws and regulations. Employees must know and follow all of the laws that apply to 3M's business. When there seems to be a conflict between, or

confusion about, the laws that apply to a particular situation, employees must check with their business unit's assigned legal counsel before proceeding.

- If there appears to be a conflict between the 3M Code of Conduct and the law, always obey the law. But, if 3M's Code sets a higher standard than the law requires, 3M's Code must be the standard for behavior. Employees must check with their business unit's assigned legal counsel before proceeding.
- If a 3M employee suspects wrongdoing by any 3M employee or a business partner, then unless prohibited by local country laws, the employee must promptly report his/her concerns to management, his/her business unit's assigned legal counsel, assigned Human Resources Manager, 3M's Ethics & Compliance team, or through 3M-Ethics.com.
- 3M does not tolerate retaliation of any kind for reporting a business conduct concern or cooperating with an investigation. 3M expects such reports to be made in good faith. This does not mean that the reporting employee must have all the facts; the employee should feel free to ask questions and to report any issue that causes the reporting employee concern without fear of retaliation. Reports or allegations that are false or malicious, however, are not in good faith and may be grounds for discipline.

**Penalties:**

Violations of the law and 3M's Code of Conduct will result in discipline, up to and including termination from employment.

**Related Information and Links:**

- [Ethical Business Conduct Principle \(/sites/corpRC0011/Pages/Global/38.aspx\)](/sites/corpRC0011/Pages/Global/38.aspx)
- [Employee Obligations and Reporting Principle \(/sites/corpRC0011/Pages/Global/39.aspx\)](/sites/corpRC0011/Pages/Global/39.aspx)
- [3M-Ethics.com \(https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=8897\)](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=8897)
- [Frequently Asked Questions \(http://legalapps.mmm.com/legal/portal/C%26BC/Code/FAQ-Compliance.pdf\)](http://legalapps.mmm.com/legal/portal/C%26BC/Code/FAQ-Compliance.pdf)