

Political Activities Policy

Policy Statement

All employees and others acting on 3M's behalf must comply with laws that apply to the use of company resources for political purposes. United States law and the law of many U.S. states generally prohibit the use of corporate resources to support or oppose candidates or political committees. Except for the lawful political contributions and activities described below, 3M does not allow political campaign or partisan political activities at any 3M workplace or facility, and does not permit the use of 3M resources, including computers, telephones, e-mail, or employee work time for political campaigning, fund-raising, or other partisan political activities.

3M employees have the right to participate individually in the political process, and to make voluntary contributions of their non-working time and personal resources to support candidates and political parties of their choice. 3M encourages employee involvement in the political process, but these activities must not in any way suggest 3M support or use 3M resources.

Eligible 3M employees and shareholders may contribute voluntarily to the 3M Political Action Committee (3M PAC). The 3M PAC is a non-partisan fund used to make contributions to U.S. federal and, where permitted, state or local candidates, parties, and political committees. Any employee may refuse to contribute to the 3M PAC without fear of reprisal. 3M will not reimburse any person for making contributions to the 3M PAC or for any other political contribution. 3M has established a PAC Board to oversee 3M and 3M PAC contributions to political campaigns, parties, or committees in the United States. Chaired by a senior 3M executive, the PAC Board reports to the Chief Executive Officer. Upon request, the PAC Board also reports to the Corporate Operations Committee and the Nominating and Governance Committee of the Board of Directors on 3M's political activities and contributions.

Permitted Activities

This Policy does not prohibit or restrict the following lawful activities or uses of 3M resources:

- The activities of the Public Affairs organization, 3M PAC, or the PAC Board.
- The use of 3M resources and facilities, including the Customer Innovation Center, for 3M PAC fundraising or 3M PAC-sponsored meetings, events, and activities.
- 3M communications on issues of concern to 3M or 3M employees.

- Other lawful activities or uses of 3M resources that are consistent with other 3M Business Conduct Policies and approved in advance by the PAC Board (for the U.S.) and the area vice president (outside the U.S.) and assigned 3M legal counsel.

3M Public Affairs may invite officeholders and candidates for public office to visit 3M facilities and address 3M employees. No 3M employee is required to attend such events. 3M may refuse or limit candidate appearances on 3M property as permitted by law. Unless expressly permitted in advance by 3M Public Affairs, no candidate may distribute literature, solicit contributions, or address employees at any 3M facility.

Additional Elements

What it means

- Except as specifically permitted, 3M does not allow use of company workplaces, equipment, or other resources for political campaign, fund-raising, or political purposes.
- Unless permitted in advance by the PAC Board, and only then to the extent allowed by applicable federal or state law, 3M does not permit employees to distribute campaign literature, solicit campaign contributions, or participate in other political activities during paid working hours.
- Certain management and supervisory employees and shareholders may be asked to contribute to the 3M PAC, as permitted by U.S. law. No employee is required to contribute to the 3M PAC, and anyone may refuse to contribute without fear of reprisal. 3M will not reimburse any employee for 3M PAC or other political contributions.
- You may make personal contributions of non-working time and money to the candidates or party of your choice, provided you do not use 3M resources and do not suggest that your action constitutes 3M support.

What to avoid

- Except as expressly permitted by this policy, making, copying, or distributing political materials using 3M equipment or resources, or engaging in other political activities during paid working time.
- Any coercion of any employee to contribute to 3M PAC or to make any political contribution.
- Any suggestion that a private, personal donation of time or money constitutes 3M support.
- Offending co-workers with inappropriate political messages.