



# Lobbying and Political Activities Principle

## Principle Statement

As engaged members of our communities, 3M actively participates in public policy and legislative advocacy, or "lobbying." 3M's Government Affairs organization coordinates and oversees 3M's lobbying and political activities. Before hiring a lobbyist, engaging in direct lobbying, or communicating with public officials on 3M's behalf, 3M employees must consult with senior staff of 3M Government Affairs.

3M resources may only be used for political or lobbying activities when consistent with 3M's Code of Conduct Principles. These resources are approved in advance by the head of Government Affairs and assigned 3M legal counsel.

As appropriate, 3M may support candidates and political committees in elections. To this end, 3M has constituted a Political Action Committee (3M PAC) and 3M PAC Board. The 3M PAC Board is made up of senior 3M employees who oversee the PAC budget and approves 3M's political contributions requests proposed by 3M's Federal and State Government Affairs team.

The 3M PAC is a nonpartisan fund created under U.S. law and comprised of voluntary employee and stockholder contributions. The 3M PAC is used to make contributions to U.S. federal, state, local candidates, political committees and other organizations as permitted by law.

3M respects our employees' rights to participate in the political process and to communicate with their elected representatives using their own time and resources on personal non-3M matters. However, 3M resources and facilities must not be used for private, non-3M, political or lobbying activity. This includes use of facilities, email, copier, and other 3M resources.

3M values the engagement of public officials on matters that affect our communities and the industries in which we participate. Any such engagement on 3M premises or that involves the use of 3M resources must comply with all relevant laws and not give rise to any actual or perceived conflicts of interest.

3M employees are only permitted to host elected and other public officials on our premises, in accordance with Company policies and applicable laws. These visits to 3M facilities must be made in consultation with 3M Government Affairs prior to the event. Elected officials, candidates for elective office, or their campaign surrogates may not, however, be hosted at a 3M facility or on 3M premises within 15 days prior to any election in which he or she is a candidate ("prohibited period").

The prohibited period includes hosting an elected official, candidate, or surrogate for any election or non-election related purpose. The prohibited period applies regardless of whether the official, candidate or surrogate intends to reimburse the Company for the use of its facilities, and the prohibited period applies to whether the 3M host or sponsoring employee is acting in a personal capacity or otherwise.

## Purpose:

Lobbying is an appropriate way for companies like 3M to educate policymakers about the legitimate interests of 3M and our employees, but these communications must be conducted and reported in compliance with applicable laws.



The use of corporate resources to influence the political process is strictly regulated to protect and promote the integrity of the political processes of countries around the world. In the U.S. and around the world, national, territorial, state, and local governments often prohibit the use of corporate resources to support or oppose candidates or political committees.

This Principle applies globally to all employees and others acting on behalf of 3M. See the Compliance Principle for information on when a third party might be covered by the Code of Conduct Principles.

**Additional Guidance:**

- "Lobbying" means communicating with lawmakers and other public officials to help shape public policy on laws, regulations, and issues that affect our business and our employees. In the United States, 3M employees and others acting on 3M's behalf must comply with federal, state, and local lobbying laws. Lobbying laws vary depending on the level of government and government body and the nature of our engagement. In some states, sales activities may constitute lobbying, triggering registration and reporting requirements. To ensure that 3M has followed registration and reporting laws that may apply, all employees must consult with 3M Government Affairs and their assigned 3M legal counsel in advance of contacting elected representatives or government employees to determine whether the proposed contact constitutes lobbying and requires registration, reporting, or other action. Any lobbying activities outside of the U.S. must be approved by 3M Government Affairs and assigned legal counsel.
- Any engagement of an external (i.e., non-employee) lobbyist or government affairs consultant must first be reviewed and approved by the 3M Government Affairs and assigned 3M legal counsel. Any such engagement must be made under a written contract that requires the lobbyist to comply with all applicable registration and reporting laws, as well as 3M's Code of Conduct Principles.
- Unless permitted by 3M Government Affairs in advance, with review by assigned legal counsel, 3M does not permit employees to distribute campaign literature, solicit campaign contributions, or participate in other political activities during paid working hours or using 3M resources or facilities.
- 3M Government Affairs may – as permitted by law – invite officeholders and candidates for public office to visit 3M facilities and address 3M employees, except that no such visits may occur during the prohibited period (described above). No 3M employee is required to attend such events. 3M may refuse or limit candidate appearances on 3M property. All such events must be in consultation with 3M Government Affairs.



- 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. 3M has established a PAC Board to oversee 3M PAC contributions to political campaigns, parties, or other political committees in the United States.

Chaired by a senior 3M employee, the 3M PAC Board reports to the Chief Executive Officer. The Head of U.S. Government Affairs and Chief Legal Affairs Officer also report periodically to the Nominating and Governance Committee of the Board of Directors on 3M's political activities and contributions.

Eligible 3M employees and shareholders may be asked to voluntarily contribute to the 3M PAC as permitted by U.S. law. Any employee may refuse to contribute to 3M PAC without fear of reprisal. 3M will not reimburse any person for making contributions to 3M PAC or for any political contribution. Coercion of any employee to contribute to 3M PAC or to make any political contribution is unlawful.

- Outside of the United States, 3M will only make political contributions if approved in advance by the 3M Government Affairs and assigned legal counsel.
- The hiring of former or current elected or appointed officials must be reviewed for compliance with all applicable laws by assigned legal counsel and human resources personnel. Restrictions on employment may apply that are unique to former or current elected or appointed public officials.
- Anything of value given to an elected or appointed public official must first be approved by assigned legal counsel and in conjunction with consultation with 3M Government Affairs. Jurisdictions vary on the permissibility, limitations, and reporting requirements, and care must be taken to ensure 3M complies with all applicable laws. Nothing of value can be given with the expectation that the elected or appointed public official will take any action to benefit 3M.

**Penalties:**

Violations of 3M's Code of Conduct or this Principle may result in discipline, up to and including termination of employment.