



Company & Culture

Ethics & Compliance

Code of Conduct

Gifts Principle Translations

Gifts, Entertainment, and Travel Principle

Principle Statement:

Traditionally, offering and receiving business gifts, entertainment or travel strengthens business relationships and can help our products in the global marketplace. When done within established limits, these activities continue to be a lawful and appropriate business practice. When dealing with customers, partners, and/or government officials, employees must ensure they offer, give, and receive gifts, provide meals or entertainment, and pay for travel only if it is of reasonable value, complies with the recipients' own laws and corporate regulations, is not given with any corrupt intent to improperly influence the recipient's actions or decisions, and is infrequent.

Any gift or entertainment provided to a third party under this Principle must be properly reflected in the books and records of the 3M business unit or subsidiary that provides it.

Purpose:

This Principle helps ensure that 3M conducts these lawful business practices consistent with 3M's Code of Conduct, complies with all applicable laws and rules, and that accurate books and records are kept reflecting these expenses.

This Principle applies globally to all employees and may apply to those 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:

- BUSINESS COURTESY: For purposes of this Principle, a gift, meal, travel opportunity or entertainment will be referred to as a "business courtesy." The term "gift" means any gift, gratuity, favor, benefit, discount, forbearance, or other tangible or intangible item having monetary value for which the recipient does not pay fair market value. A "gift" also includes meals, drinks, entertainment and recreation (tickets, passes, etc.), services, training, transportation, discounts, promotional items, lodging, gift cards, or door prizes.
- No 3M employee may give or receive a business courtesy that violates the law, regulations, contracts or agreements, or reasonable customs of the marketplace.
- Gifts of items in quantities intended for personal use that are marked with 3M promotional labeling are generally appropriate.
- Properly record any business courtesy on the business unit's books and financial records. The record must comply with any policies of the specific 3M business unit.
- When deciding on the appropriateness of giving or receiving a business courtesy, employees should consider:
 - How it compares in value to the usual gift-giving practices in the applicable industry and country;
 - Whether any legal or regulatory restrictions exist;
 - The total value of business courtesies to or from that person or entity in the current year;
 - The suitability of the business courtesy given the 3M employee's position at 3M;
 - The impact of the business courtesy on building positive business relations with the recipient or provider of the business courtesy; and
 - Whether an objective party would consider the business courtesy to be reasonable in cost and quantity or to be extravagant.
- This Principle applies even when personal funds or assets are used and no reimbursement from the company is sought. Any time the business courtesy may be seen as being given on behalf of 3M, this Principle must be followed.
- If an employee intends to offer, or is offered a business courtesy that could be viewed as excessive under this Principle, the employee must receive advance approval from his/her supervisor, who, in turn, should consult with the business unit's assigned legal counsel, the Ethics & Compliance Department, and/or Government Contract Compliance.
- Supervisors are responsible for reviewing the appropriateness of business courtesies offered or provided by 3M employees. A supervisor's approval of expense vouchers or an approval given by other means, indicates that a review was completed and the supervisor determined the business courtesies provided were appropriate. Supervisors must ensure they take the needed time to understand the details regarding any business courtesy and follow all existing processes for giving their approval.
- In the U.S., federal, state and local government regulations on business courtesies are complex and vary among government agencies. Consult with Government Contract Compliance or the business unit's assigned legal counsel before giving business courtesies to employees of federal, state, and/or local government agencies. Training is available upon request.
- In general, modest items of food and refreshment, such as soft drinks, coffee, cookies, fruit, rolls or doughnuts, when not served as part of a meal, or when provided in a buffet opened to multiple people, are permitted business courtesies for government employees. If the government employees seek to make reimbursement, we can provide written receipts to them. Work with Staff or Business Unit controllers to credit the government employee's payment to 3M.
- Giving or receiving money or cash equivalents such as gift cards, gift certificates or vouchers almost always violates this Principle. In limited and defined circumstances, within special

conditions, 3M policies and procedures may permit such gifts, but employees must consult with the business unit's assigned legal counsel and the Ethics & Compliance Department before acting. When in doubt, play it safe and avoid giving or receiving such gifts.

- Do not give or receive business courtesies that are too costly or too frequent to be within the customs of the marketplace or business situation. Such extravagant courtesies almost always will violate this Principle.
- Do not give or receive business courtesies that are intended to, or even appear to, improperly or corruptly influence a decision relating to 3M. Bribery and kickbacks are illegal and violate this Principle.
- Do not offer a business courtesy that would violate the recipient's company or agency policy.
- Do not give or receive entertainment and recreation, such as tickets to a sporting event, where a representative of the company offering the business courtesy will not accompany the recipient to the event. For example, this Principle prohibits giving a customer four tickets to a professional sports game when no 3M employee will attend the game with the customer.
- Do not offer or provide business courtesies to government employees in the United States, unless it is clearly permissible under applicable laws and regulations, or prior approval has been obtained from Government Contract Compliance or your business unit's assigned legal counsel. Also, avoid offering or providing business courtesies to employees or representatives of other countries' governments, unless approval is obtained via established anti-bribery due diligence and approval processes in the applicable subsidiary. Offering or providing a business courtesy that exceeds the restrictions may constitute a criminal offense, regardless of whether the business courtesy is funded by 3M or personal funds.
- Do not give any business courtesy to reward a government employee for any decision that employee makes.
- Do not hold raffles or other "give-aways" to a group that is principally comprised of government officials who could not accept the raffle or give-away prize if it were offered as a gift. (For example, raffling an iPad to the attendees at the International Chiefs of Police convention.)

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:

- [Anti-Bribery Principle \(/sites/corpRC0011/Pages/Global/40.aspx\)](/sites/corpRC0011/Pages/Global/40.aspx)
- [Doing Business with Government Agencies and Government Contractors \(/sites/corpRC0011/Pages/Global/48.aspx\)](/sites/corpRC0011/Pages/Global/48.aspx)
- [3MEthics.com \(https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=8897\)](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=8897)
- [Use of Cash or Cash Equivalents in 3M Programs with Non-3M Workers Standard \(/sites/PolCent/Policy%20Central/Forms/DispForm.aspx?ID=1015&Source=https%3a//skydrive3m.sharepoint.com/sites/PolCent&InitialTabID=Ribbon.Read\)](/sites/PolCent/Policy%20Central/Forms/DispForm.aspx?ID=1015&Source=https%3a//skydrive3m.sharepoint.com/sites/PolCent&InitialTabID=Ribbon.Read)
- [Frequently Asked Questions \(http://legalapps.mmm.com/legal/portal/C%26BC/Code/FAQ-Gifts.pdf\)](http://legalapps.mmm.com/legal/portal/C%26BC/Code/FAQ-Gifts.pdf)