

# Doing Business with Government Agencies and Contractors

## Principle

### Principle Statement:

3M is committed to conducting its government contract and subcontract business in strict compliance with all applicable national, state, province and local laws and regulations and all contract requirements. 3M employees and third parties to whom this Principle applies must comply with all such laws.

Business with government units throughout the world, including business through government contractors and subcontractors, is subject to complex requirements that are often stricter than those for commercial customers. 3M may be required to disclose and certify detailed information about the company and shareholders, including political contributions, lobbying, gifts to government officials, and communications with government officials. Even sales-related communications may fall within the scope of the disclosure requirements. Making inaccurate and incomplete statements or certifications to government entities may result in serious legal consequences for 3M and its employees, and may affect 3M's ability to do business with government customers in the future. Before entering into any government contract, or any agreement related to a government customer, 3M employees must consult 3M's Government Contract Compliance Department or their business unit's assigned legal counsel.

### Purpose:

This Principle helps ensure that 3M complies with all applicable national, state, province and local laws and regulations regarding government contracting. Failure to comply with these laws could affect existing 3M government contracts and the ability to contract with government customers in the future.

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:

- Understand and follow Government Contract Compliance Policies, Standards and Procedures posted in the Policy Center on 3M Source or on the Government Contract Compliance Department (GCC) website.
- Be aware of and fully comply with the laws and regulations applicable to selling to government agencies, government prime contractors, subcontractors and suppliers.
- Be honest and accurate in all dealings with government officials, government agencies, government prime contractors and subcontractors.
- Ensure that certifications and representations made in connection with government contracts and subcontracts are current, accurate and complete.
- Never seek or obtain confidential information about a government purchase or contract, including information about a competitor's bid or proposal or the agency's selection process, before award of the contract.
- Do not make false statements or certify false data to government employees, government agencies, or government contractors or subcontractors.
- Never offer or give business courtesies to government employees or employees of government contractors or subcontractors in violation of national, state, province, or local government laws or regulations.
- Do not deviate from government contracting or subcontracting requirements or the terms of any government contract. For example:
  - Comply with all country of origin requirements.
  - Always perform required quality control.
  - Do not make unauthorized contract or subcontract substitutions, including substitution of products that do not meet country of origin requirements.

- Do not deliver products or services without performing required tests, inspections or other quality control.
- Be aware that applicable laws and regulations may vary from country to country, state to state, province to province, municipality to municipality, and government agency to government agency. Employees must seek advice or answers to questions from 3M Government Contract Compliance Department or their assigned 3M legal counsel.
- All business unit/subsidiary employees involved with government contracts and subcontracts must be:
  1. Properly trained and understand the applicable laws, regulations, and contract terms and conditions, and
  2. Familiar with 3M policies, standards and procedures related to government contract compliance.
- Understand and follow 3M's Export, Import and Trade Compliance Principle, especially as it pertains to compliance with export control laws, importation, product marking and representations of product origin, directly or indirectly, to international or U.S. federal, state, or local government customers.
- Understand and follow 3M's Gifts, Entertainment, and Travel Principle regarding gifts to international or U.S. federal, state, or local government employees.
- Understand and follow 3M's Anti-Bribery Principle in all dealings with international or U.S. federal, state, or local government officials or other individuals.
- Obtain prior clearance from Human Resources to discuss employment with or offer employment (either as an employee, contingent worker or consultant) to former and current government employees, as detailed in 3M's Hiring Former and Current Government Employees and Consultants Policy.

**Penalties:**

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