

Advertising and Product Representation Principle

Principle Statement:

3M's reputation as a responsible company extends to the products and services we offer and how we represent them. 3M employees, and any third party to which this Principle applies, must represent 3M's products and services truthfully, fairly, accurately, and in a professional manner in all sales, advertising, packaging and promotional efforts. Management of every 3M business unit is responsible for having a process to ensure appropriate review of advertising and claims about its products and services.

Purpose:

Trust is the foundation of 3M's business relationships with its customers, business partners, and end users. 3M must communicate honestly and accurately about 3M's products and services.

This Principle applies globally to all employees and may apply to third parties 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:

- Apply this Principle to all express or implied claims in advertising, which includes product literature, labels, packaging, advertising copy, environmental claims, customer surveys and certifications, promotional materials, technical data sheets, product information sheets, user and maintenance manuals, videotapes, internet sites, social media, and the like.
- Always represent 3M products and services truthfully, fairly, accurately, and in a professional manner in emails, conversations, contracts, sales materials, advertising, packaging, promotions, and all other communications.
- Substantiate claims, as appropriate, through testing based on sound statistical and scientific principles, or approved through the 3M business unit's claims approval process.
- Do not overstate a product's performance.
- Do not make claims that have not been approved or appropriately substantiated.
- Follow the procedures required by the business unit for review and approval of advertising. Often, these procedures will require written approval from marketing, laboratory, technical service, clinical, quality, product responsibility, regulatory and toxicology, and Legal Affairs.
- Avoid advertising or claims not consistent with 3M's corporate values.
- Do not engage in deceptive acts or practices or other unfair methods of competition.
- Do not make false or deceptive statements about 3M products or services.
- Do not make false or deceptive comparisons of 3M's and any competitors' products or services.
- Do not unfairly criticize or discredit a competitor or its products or services.
- Do not misrepresent the quality or effectiveness of a product or service.
- Do not pass off one's products or services as those of another, such as by simulating a competitor's packaging or trademarks.

Penalties:

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