

Export, Import and Trade Compliance Principle

Principle Statement :

3M is committed to complying with all applicable export, import, and trade compliance laws in all countries in which 3M does business. This includes laws and regulations pertaining to trade embargoes and economic sanctions, export control, anti-boycott, cargo security, import classification and valuation, product/country of origin marking, and free trade agreements. In conducting business across borders, all 3M employees must be aware of and follow these laws and 3M's trade compliance Policies, Standards, and Procedures. These laws are complex and change frequently. Employees must engage 3M's Global Trade Compliance Department as needed to ensure compliance. Should 3M's policies conflict with local law, employees must always obey the law.

Purpose :

3M is a global company. 3M technologies, materials, and products regularly move among countries during research and development, manufacturing, marketing and sale. This Principle helps ensure that 3M complies with all export, import, and trade compliance laws in all of its global business activities.

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 :

The following are the categories of applicable regulations that influence export, import, and trade compliance Policies, Standards, and Procedures:

- **Trade embargoes and economic sanctions** prohibit or severely restrict business activities with certain countries and their nationals, as well as business activities with specifically-listed entities and persons.
- **Export control** regulations impose restrictions on the transfer of certain articles and technology to foreign destinations or persons.
- **Anti-boycott** regulations prohibit U.S. companies and their foreign subsidiaries from participating in unsanctioned boycotts against countries friendly to the United States. Some other countries and jurisdictions also maintain laws that prohibit compliance with unsanctioned foreign boycotts or embargoes.
- **Customs** regulations generally govern the many aspects involved in the importation of goods into countries. In virtually all countries this includes complex regulations concerning the **classification, valuation, country of origin** and marking of the imported goods. Customs regulations may also include the enforcement of **partner government agencies'** regulations on imported goods, such as health care products, chemicals, or other regulated articles.
- **Government procurement** and various **advertising** regulations define rules for making certain country of origin representations.
- **Tax** regulations influence sales terms and the obligations of parties in transactions.
- **Cargo security** laws provide minimal security standards for ensuring the physical security of cross-border shipments.
- **Free trade agreements** are two-country or multi-country international agreements that provide for certain trade preferences and benefits to the participating countries when eligibility and certification requirements are satisfied.
- Employees should be aware that applicable laws and regulations may vary from country to country.
- 3M's policies take into consideration multiple laws and regulations from across many countries, as well as management strategies, organizational structure, and above all, 3M's values. This often results in 3M's policies setting a higher standard than a specific law requires. Employees are expected to adhere to 3M's policies as the standard for behavior.

Penalties :

Failure to comply with export, import, and trade compliance laws could lead to criminal and civil penalties for 3M and for individual employees, significant business disruptions, and harm to 3M's reputation. Violations of 3M's Code of Conduct will result in discipline, up to and including termination of employment.