

3M

Business Conduct eManual



Message from 3M's Chairman and CEO

"A Century of operating with honesty and integrity has given 3M unmatched trust from our customers, credibility with your communities and dedication from our employees. Over those 100 years, our reputation has grown into an incalculable asset in our business and a source of pride for 3Mers everywhere. Our reputation powers our brands and opens doors for our products worldwide. So, each of us is responsible for maintaining and growing that reputation every day. There is never an acceptable reason for violating the law or our Business Conduct Policies – never."



W. James McNerney, Jr.
Chairman of the Board and
Chief Executive Officer

Compliance Policy

Employees and others acting on behalf of 3M must comply with all laws and 3M business conduct policies. You are also responsible for understanding the legal and policy requirements that apply to your job and for reporting any suspected violation of law or these policies. 3M business conduct policies apply to all parent company and subsidiary employees worldwide. Any exceptions are specifically stated in this manual.

Ethical Business Conduct Guidelines

3M employees worldwide should always be guided by 3M's corporate value of "uncompromising honesty and integrity in every aspect of our operations." These Ethical Business Conduct Guidelines can help you make business conduct decisions consistent with this 3M corporate value.

Antitrust and Competition Law Policy

All 3M employees must strictly comply with antitrust and competition laws of all countries, states and governmental bodies in which they conduct 3M business. Antitrust and competition laws of jurisdictions other than your home country may govern 3M's conduct or transactions.

Internal Controls, Financial Reports, Document Retention and Auditing

All 3M operations worldwide must comply with all laws relating to the maintenance of accurate and complete company financial books and records. All 3M financial books and records must be maintained in accordance with generally accepted U.S. accounting principles, 3M fiscal procedures and with all local and national laws governing the maintenance of corporate financial books and records.

Business Gifts Policy

3M employees may give and receive business gifts in their business dealings with commercial customers and with other nongovernment parties provided they meet the guidelines stated in this policy. Gifts to U.S. federal government employees are generally prohibited. Gifts to other government employees are strictly limited.

Confidential Information Policy

Each of us is responsible for protecting 3M's Confidential Information from unauthorized disclosure to those outside the company, and even those inside 3M who do not have a business need to know the information. This policy defines "Confidential Information" and discusses what you should do to protect it.

The policy is reciprocal with respect to the Confidential Information of other parties. Competitive intelligence is a valuable tool, but 3M will gather and use information about others only if the answer to each of following questions is “no.”

- Is there anything illegal or unethical about the manner in which the information would be obtained?
- Is the information the Confidential Information of another party?
- Even if the information would be obtained legally and ethically, and it is not Confidential Information, would using the information violate any other 3M business conduct principle?

3M’s Confidential Information Policy applies not only to employees, but to contractors, consultants and anyone else acting on 3M’s behalf.

If you come into contact with Confidential Information in the course of your 3M responsibilities, you must read and follow the full text of this policy.

Conflict of Interest Policy

3M employees should not engage in activities that give rise to a conflict of interest or the appearance of a conflict of interest, without prior management approval. It is the responsibility of employees to disclose all potential conflicts of interest to their management.

Electronic Resources Policy

All 3M employees worldwide must comply with all laws and 3M policies relating to 3M electronic resources and to the acquisition, storage, use and transmission of information by use of 3M electronic resources. All employees must also follow company policies and procedures when using 3M electronic resources so that 3M information is protected from inadvertent disclosure and unintended access by third parties.

Environmental, Health and Safety Policies

3M employees worldwide must comply with all applicable laws and regulations and 3M policies, procedures, and standards relating to the environment and the health and safety of our operations. In addition, 3M must retain those suppliers, contract manufacturers, and service providers that meet 3M's selection guidelines. In certain areas, 3M policies mandate more stringent actions than those required by applicable laws and regulations.

Doing Business with Government Agencies and Government Contractors Policy

All 3M employees worldwide must comply with all applicable laws and regulations of all government agencies with which 3M does business. It is also 3M policy to comply with

all contract requirements of all government agencies and government contractors with which 3M does business.

Harassment Policy

In doing business with or for 3M, everyone is entitled to a harassment-free environment. 3M is committed to providing an environment that respects individuals and enables people with diverse backgrounds and capabilities to excel. 3M management strongly supports efforts to address harassment and other inappropriate behavior in the 3M workplace.

Transacting International Business Policy

3M employees worldwide must comply with 3M business conduct policies in all international business transactions. 3M employees must also comply with the legal requirements of each country in which they conduct 3M business and with U.S. laws that apply in other countries.

Lobbying Policy

All 3M employees worldwide must comply with all applicable laws, rules and regulations relating to lobbying or attempting to influence government officials.

Political Activities Policy

Political activities by a corporation are highly regulated. 3M's global policy is compliance with the laws and regulations which apply to the political activities of 3M.

Political Contributions Policy

3M employees may not use 3M Political Action Committee (3M PAC) funds, 3M corporate funds or any other 3M property to make contributions, payments or provide any support to U.S. political parties, committees or candidates unless the contribution, payment or support is approved by the 3M Political Contributions Committee. Political contributions of corporate funds or other corporate property are lawful in some countries, but all such contributions must be approved by the area vice president acting on advice of assigned 3M legal counsel.

Product Introduction and Representation Policy

3M business units must provide products and services that are safe, useful, reliable, high quality, and environmentally responsible, and represent them truthfully, fairly, and in good taste in sales, advertising, packaging, and promotion.

Securities Trading Policy

3M employees worldwide must comply with all laws, rules and regulations relating to the trading of securities, such as 3M common stock, put or call options in 3M stock, and the trading of securities of any other business enterprise while in the possession of material "inside" information that has not been disclosed to the public and that has been obtained by reason of their 3M employment.