

## **Political Contributions and Activities**

Published: July 8, 2008

3M and its employees are affected by government regulations and policies. As concerned members of our communities, we actively participate in government and public policymaking. These activities must always comply both with law and 3M's Political Activities Policy. Except for expressly permitted, lawful activities, the Political Activities Policy generally prohibits the use of 3M facilities and resources for partisan political activities and provides detailed guidance to 3M employees and others acting on 3M's behalf.

### **Political Contribution Approval Process and Executive Review**

3M has established a PAC Board comprised of 3M executives to oversee contributions of 3M and 3M Political Action Committee (3M PAC) resources. Contribution budgets are developed by 3M's Public Affairs organization with input from 3M businesses. These contribution budgets are then reviewed and approved in advance by the PAC Board. Individual contributions are approved in advance by the Chair of the PAC Board. The 3M PAC treasurer and assigned legal counsel review and approve all contributions for budgetary and legal compliance, respectively.

3M's Public Affairs organization at least annually determines the key public policy issues that appear likely to affect the company's business interests in the United States. The resulting list of Priority Public Policy Issues guides the Company's engagement with public policymakers in the United States.

3M seeks to support candidates whose voting records or positions are on balance supportive of 3M's important business interests. We use the following factors when considering contribution proposals:

- Voting record or position on 3M's Priority Public Policy Issues;
- Commitment to improving the climate for 3M businesses;
- Whether the candidate represents or seeks to represent areas in which 3M has facilities or significant business operations; and
- Whether the candidate is expected to hold a leadership position or work in areas of importance to 3M shareholders, employees, and communities.

We recognize that candidates who receive contributions from the 3M PAC or our company will not necessarily agree with 3M's positions on all public policy issues.

### **Executive Oversight**

3M's positions on important public policy issues, our engagement in government and lawmaking processes, and 3M and 3M PAC political contributions are reviewed at least annually with the Chief Executive Officer. As requested, the PAC Board also reports to the Corporate Operations Committee or the Nominating and Governance Committee of the Board of Directors.

### **3M Political Action Committee**

United States law generally prohibits companies from using corporate resources to support or oppose candidates in federal elections. Some states likewise prohibit contributions using corporate resources. Eligible 3M employees and shareholders may contribute voluntarily to the 3M PAC. Administered by company employees with the oversight of the PAC Board, the 3M PAC makes contributions to U.S. federal and, where permitted, state candidates, parties, and committees. 3M does not under any circumstances require any employee to contribute to the 3M PAC. All 3M PAC receipts and contributions are publicly disclosed as required by law on the [Federal Election Commission](#) website. The 3M PAC's contributions in the 2007 election cycle totaled less than \$300,000.

### **Corporate Resources**

Some U.S. states allow companies to contribute to state and local candidates and ballot measures. In 2007, 3M contributed less than \$100,000 to state and local candidates. As a general rule, 3M does not make political contributions outside of the United States. Under 3M's [Political Activities Policy](#) contributions that are lawful and consistent with 3M's other [Business Conduct Policies](#) may be made with the approval of a 3M area vice president and assigned legal counsel.

### **Contributions to "527 Organizations"**

We use the term "527 organization" to refer to political groups organized under Section 527 of the Internal Revenue Code whose primary purpose is to influence federal and state elections in ways that may be outside the scope of federal election laws. 3M and 3M PAC historically have not made substantial contributions to 527 organizations. If we make a contribution to any 527 organization totaling \$50,000 or more we will promptly disclose that fact on this website.

In May 2008, we made contributions (including membership dues) of \$110,000 to the Democratic Governors' Association and \$57,500 the Democratic Legislative Campaign Committee.