



## Political Activities and Issue Advocacy

3M and its employees are engaged in the community and actively participate in government and public policymaking. These activities must always comply both with applicable laws and 3M's [Political Activities Principle](#).

### Executive and Board Oversight

3M has established a [PAC Board](#) comprised of 3M executives to oversee contributions of 3M (Corporate Advocacy Budget) and 3M Political Action Committee (3M PAC) resources. Contribution budgets are developed by 3M's Government Affairs organization with input from 3M businesses. These contribution budgets (both Corporate and PAC) are then reviewed and approved in advance by the PAC Board. Individual contributions are considered and approved in advance by the Global Head of Government Affairs with the oversight of the PAC Board. The 3M PAC treasurer and assigned legal counsel review each contribution for budgetary and legal compliance, respectively.

3M's positions on important public policy issues, its engagement in government and lawmaking processes, any specific policy or lawmaking engagements with industry trade associations, 3M's policies on political expenditures, and 3M and 3M PAC political contributions are reviewed at least annually with the Chief Executive Officer and the PAC Board. The Global Head of Government Affairs also reports on these matters periodically to the Nominating and Governance Committee of 3M's Board of Directors.

### Factors Considered in Issue Advocacy and Evaluating Contribution Proposals

3M's Government Affairs organization, with input from 3M executives and businesses, at least annually determines the key public policy issues that appear likely to affect the company's business interests globally. The resulting list of [Priority Public Policy Issues](#) guides 3M's engagement with public policymakers.

3M seeks to support candidates whose voting records or positions are, on balance, supportive of 3M's important business interests. 3M uses 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.

3M recognizes that candidates who receive contributions from the 3M PAC or 3M will not necessarily agree with 3M's positions on all public policy issues. Individual contribution decisions are made without regard to the private political preferences of individual executives or other employees. 3M does not contribute to candidates outside the United States.

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

Administered by 3M employees with the oversight of the PAC Board, 3M PAC makes contributions to U.S. federal and, where permitted, state or local candidates, parties, and political committees. Contributions to 3M PAC are entirely voluntarily. 3M does not require any employee to contribute to the 3M PAC, and 3M will not reimburse any person for 3M PAC or any other political contribution.

All 3M PAC receipts, disbursements, and contributions are publicly disclosed as required by law. 3M's reports are available on the [Federal Election Commission](#) website.

### **Corporate Contributions**

Some U.S. state and local governments allow companies to contribute directly to candidates, political committees, and ballot measures. Corporate contributions are part of the Corporate Advocacy Budget that is reviewed and approved by the 3M PAC Board. Attached is a detailed listing of state and local candidates and party committees to whom [3M contributed](#) during 2018 (no contributions have been made in 2019). 3M will update this listing twice a year. 3M contributions since 2013 are available here: [2013](#), [2014](#), [2015](#), [2016](#), [2017](#).

### **Contributions to Section 527 Organizations and Independent Expenditures**

3M uses the term "527 organizations" to refer to political organizations created under Section 527 of the Internal Revenue Code other than political action committees and candidate or party committees. Attached is a detailed listing of [3M contributions](#) to 527 organizations during 2019. 3M will update this listing twice a year. 3M contributions since 2013 are available here: [2013](#), [2014](#), [2015](#), [2016](#), [2017](#), [2018](#).

The company has not contributed to federal Independent Expenditure-Only Political Committees (also known as "Super PAC's") in the past and inadvertently contributed in 2018. That contribution has since been refunded. Going forward, it is the policy of 3M to not contribute to "Super PACs."

3M has not made any independent expenditures and going forward has no intention to do so. Should 3M's position change, we will list any such contributions here.

### **Issue Advocacy**

Issue advocacy or "lobbying" is an important and appropriate way for 3M to communicate with lawmakers and regulators about the interests of 3M and its employees, shareholders, and communities. Often 3M relies on professionals, both inside and outside of the company, who bring public policy and communication expertise to bear on legislative, regulatory, and public policy discussions. 3M's [Lobbying Principle](#) requires that 3M employees and those acting on its behalf comply with all lobbying laws and regulations.

Lobbying is highly regulated in the United States through a variety of state and federal registration and reporting laws. At the federal level, each quarter 3M files with the Office of the Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate a report listing all of the issues on which 3M conducted "lobbying activities." These quarterly lobbying disclosure reports, which are available by searching 3M as

“registrant” in the [House of Representatives database](#), also contain 3M’s total lobbying expenses, including all costs of state-level and “grassroots” lobbying. *(On this webpage, for "Search Field", use the pull-down menu to select "Registrant Name", then enter "3M" under "Criteria." In the next "Search Field" use the pull-down menu to select "Filing Year", then enter a specific year you wish to search under "Criteria." Click "Search" at the bottom, and you will see the 3M quarterly filings available for that year).*

## **Trade and Industry Associations**

3M’s participation in trade associations offers significant benefits by providing access to business, technical, and industry standard-setting expertise, and by advancing the company’s commercial interests. Before joining a trade and industry association, 3M Compliance and Business Conduct performs an integrity assessment to assure the association complies with 3M’s operating and business principles. Some of these associations may engage in lobbying on behalf of their members. 3M asks trade associations to disclose the portion of any 3M dues that are used for lobbying purposes. 3M’s total lobbying expenses as identified in 3M’s quarterly lobbying disclosure reports include the portion of trade association dues that 3M was notified were used by associations for lobbying activities.

Below is a list of the amount of trade association dues allocated for lobbying purposes (\$25,000 or greater) for the previous calendar year:

### **Trade Association / Amount of dues or payments for Lobbying (\$)**

- U.S. Chamber of Commerce = \$123,000
- Business Roundtable = \$255,000
- Minnesota Chamber of Commerce = \$82,775
- Advanced Medical Technology Association = \$57,245
- Civil Justice Reform = \$33,000
- Association for Accessible Medicines = \$39,600

3M may advise the trade associations in which it participates of 3M’s views on important public policies. 3M recognizes, however, that its positions do not always align 100% with those of the industry and trade organizations to which 3M belongs, given the wide range of issues addressed by these organizations and the divergent views and interests of their members. Nevertheless, 3M believes that the overall benefit of its memberships in trade associations outweighs the differences that may arise periodically. 3M has increased transparency by disclosing those trade associations in which the portion of 3M’s dues or payments allocated for lobbying purposes is \$25,000 or greater. 3M will continue to post its positions on important public policy issues on 3M’s [Corporate Governance](#) web site to ensure that stakeholders understand 3M’s positions. 3M will periodically evaluate its memberships in trade associations to ensure that, on balance, they continue to serve the long-term interests of the company and stockholders.

3M is aware that many organizations develop model legislation to advance the interests of their members. 3M generally supports such efforts where the organization is transparent in its advocacy and the model legislation supports 3M’s business interests, such as model legislation to improve highway safety. 3M is also aware that some groups write and endorse model legislation without the appropriate transparency as to the person or group actually supporting the model legislation. 3M does not support such groups.

Accordingly, 3M has not been a member in groups such as the American Legislative Exchange Council (ALEC).

### **Compliance**

3M conducts regular trainings, compliance system reviews and internal audits to ensure all PAC and corporate political contributions are made in accordance with the law and company policies.

### **Anti-Bribery Policy**

3M prohibits bribery. 3M employees and any third party to whom the Principles applies, must not provide, offer or accept bribes, kickbacks, corrupt payments, facilitation payments, or inappropriate gifts, to or from Government Officials or any commercial person or entity, regardless of local practices or customs. All 3M employees and any third party acting on behalf of 3M's behalf must comply with all applicable anti-bribery laws and regulations, including, but not limited to, the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act (UKBA).

[Click here for a link to 3M's complete Anti-Bribery Principle.](#)

### **Hiring Former and Current Government Employees or Their Relatives Policy**

Hiring or discussing possible employment with former and current government employees or their relatives could create the perception, even if accurate, that 3M is attempting to influence or reward government decisions to purchase 3M's products, or to influence how laws and regulations affecting 3M are enforced. [Click here for a link to 3M's global policy on Hiring Former and Current Government Employees or Their Relatives Policy.](#) In the event a former government employee or relative is hired, 3M adheres to all local and national laws on "cooling off" periods before they can represent 3M in front of their former government employer.

### **Contracting Services with Elected Officials**

3M does not contract services with sitting elected officials.

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