

Lobbying and Political Activities Principle

Principle Statement:

As a concerned member of our communities, 3M actively participates in public policy and legislative advocacy, or "lobbying." As appropriate, 3M also participates in political activities to elect and work with elected representatives and government officials. 3M's Government Affairs organization coordinates and oversees 3M's lobbying and political activities. 3M Political Activities Board, which is made up of senior 3M executives, oversees 3M's political contributions and the activities of 3M's Political Action Committee (3M PAC). 3M PAC is a nonpartisan fund comprised of voluntary employee and stockholder contributions that is used to make contributions to U.S. federal, state, and local candidates as permitted by law.

Before hiring a lobbyist, engaging in direct lobbying, or communicating with public officials on 3M's behalf, 3M employees must consult 3M Government Affairs.

3M respects our employees' rights to participate in the political process and to communicate with their elected representatives using their own time and resources. 3M resources and facilities must not be used for private, political or lobbying activity.

Purpose:

Lobbying is an appropriate way for companies like 3M to educate policymakers about the legitimate interests of 3M and our employees, but these communications must be conducted and reported in compliance with applicable laws.

The use of corporate resources to influence the political process is strictly regulated to protect and promote the integrity of the political processes of countries around the world. Specifically, United States law, the laws of many U.S. states, and the laws of many other countries and territories generally prohibit the use of corporate resources to support or oppose candidates or political committees.

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:

- "Lobbying" means communicating with lawmakers and other public officials to help shape public policy on laws, regulations, and issues that affect our business and our employees. In the United States, 3M employees and others acting on 3M's behalf must comply with federal, state, and local lobbying laws. Lobbying laws vary depending on the level of government and government body. For example, in the United States, state lobbying laws vary from state to state and change frequently. In some states, traditional sales activities may constitute lobbying, triggering registration and reporting requirements. Contact 3M Government Affairs for additional guidance. To ensure that 3M has followed registration and reporting laws that may apply, all employees must consult with 3M Government Affairs and their assigned 3M legal counsel in advance of contacting elected representatives or government employees to determine whether the proposed contact constitutes lobbying and requires registration, reporting, or other action.
- Any engagement of an external (i.e., non-employee) lobbyist or government affairs consultant must first be reviewed and approved by the Vice President of Government Affairs and be made under a written contract that requires the lobbyist to comply with all applicable registration and reporting laws, as well as 3M's Code of Conduct Principles. Be sure to work with 3M Sourcing and Government Affairs to obtain the appropriate written contract requirements. Reporting of lobbying activities and expenses is handled by 3M Legal Affairs.
- Unless permitted in advance by the PAC Board, and only then to the extent allowed by applicable federal or state law, 3M does not permit employees to distribute campaign literature, solicit campaign contributions, or participate in other political activities during paid working hours.
- 3M Government Affairs may – as permitted by law – invite officeholders and candidates for public office to visit 3M facilities and address 3M employees. No 3M employee is required to attend such events. 3M may refuse or

limit candidate appearances on 3M property as permitted by law. Unless expressly permitted in advance by 3M Government Affairs, no candidate may distribute literature, solicit contributions, or address employees at any 3M facility.

- 3M PAC is a non-partisan fund used to make contributions to U.S. federal and, where permitted, state or local candidates, parties, and political committees. 3M has established a PAC Board to oversee 3M and 3M PAC contributions to political campaigns, parties, or other political committees in the United States. Chaired by a senior 3M executive, the PAC Board reports to the Chief Executive Officer. Upon request, the PAC Board also reports to the Corporate Operations Committee and the Nominating and Governance Committee of the Board of Directors on 3M's political activities and contributions. Eligible 3M employees and shareholders may contribute voluntarily to 3M PAC. Those eligible employees and shareholders may be asked to contribute to the 3M PAC as permitted by U.S. law. Any employee may refuse to contribute to 3M PAC without fear of reprisal. 3M will not reimburse any person for making contributions to 3M PAC or for any political contribution. Coercion of any employee to contribute to 3M PAC or to make any political contribution is unlawful.

Penalties:

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