



Lobbying and Political Activities Governance

3M and its employees are engaged in the many communities where the company operates and may actively participate in government and public policymaking. These activities must always comply both with applicable laws and 3M's [Lobbying and Political Activities Principle](#). This statement explains 3M's principles and governance procedures and provides detailed information about 3M's lobbying, political activities and engagement with industry associations.

Executive and Board Oversight

3M has established a [PAC Board](#) comprised of 3M executives to oversee political contributions of 3M's Political Action Committee (3M PAC) and its Corporate Advocacy Budget. Contribution budgets are developed by 3M's Government Affairs organization with input from various 3M business groups. As a general rule, 3M Government Affairs suggests candidates that align with 3M values and culture and advocate for sound policies based on science and facts.

The candidates and contribution amounts are then vetted by an external research service which provides in-depth analysis, identify and score conflicts of interest around integrity and ethics, diversity and inclusion and personal conduct, and is then reviewed by the Board Treasurer and legal compliance counsel before being presented to the PAC Board at quarterly board meetings. It is at these meetings that the PAC Board discusses the summary findings on candidates and votes to approve or decline any suggested contributions.

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 periodically with senior leadership and the PAC Board. The Senior Vice President, Global Government Affairs also reports on these matters periodically to the Nominating and Governance Committee of 3M's Board of Directors.

Factors Considered in Evaluating Contribution Proposals

3M's Government Affairs organization, with input from 3M executives and businesses, at least annually determines key public policy issues that appear likely to affect the company globally. 3M uses the following factors when considering contribution proposals:

- Voting record or position on 3M's Priority Public Policy Issues;
- Commitment to improving the business climate for 3M;
- 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.

In addition, 3M does not contribute to candidates that supported the events surrounding January 6th, 2020, and/ or who did not acknowledge the results of the 2020 Presidential election.

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

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. Employee contributions to 3M PAC are entirely voluntarily and 3M does not reimburse any person for any 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](#) and corresponding state websites.

Corporate Contributions

Some U.S. state and local governments allow companies like 3M to contribute to candidates, political committees and ballot measures. Corporate contributions are reviewed and approved by the 3M PAC Board. Attached is a [detailed listing](#) of state and local candidates and party committees that 3M has contributed to in the preceding five years. We will update this listing twice a year.

Grassroots Lobbying

"Grassroots lobbying" refers to any communication that is aimed at mass mobilization of the public on a specific legislative proposal or ballot initiative and that encourages the recipient of the communication to take specific action with respect to the legislative proposal. 3M has not engaged in grassroots lobbying, as so defined, and has no plans to do so. Should 3M's position change, we will disclose any grassroots lobbying efforts here.

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 in the preceding five years. Contributions are reviewed and approved by the 3M PAC Board. We will update this listing twice a year. 3M has not made any independent expenditures and going forward has no intention of doing so. Should 3M's position change, we will list such contributions here.

Lobbying

Issue-based 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. 3M Government Affairs relies on professionals, both inside and outside of the company, who bring public policy and communications expertise to bear on legislative, regulatory and public policy discussions. 3M’s [Lobbying and Political Activities Principle](#) requires that 3M employees and those acting on our behalf comply with all applicable 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 that lists the issues on which 3M has conducted “lobbying activities.” These quarterly lobbying disclosure reports are available by searching 3M as “registrant” in the [House](#) or [Senate databases](#). State lobbying reports are available to the public on the corollary state websites.

Trade and Industry Associations; Social Welfare Organizations; Model Legislation

3M’s participation in trade associations can offer significant benefits by providing access to business, technical and industry benchmarking data and standard-setting expertise, and by advancing the company’s commercial interests. Before joining a trade or industry association, 3M’s Ethics and Compliance department performs an integrity assessment to assess whether the association complies with 3M’s operating and business principles.

Some associations may engage in lobbying on behalf of their members. In those instances, 3M asks trade associations to which it belongs 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 corporately-funded trade associations, with the dues allocated for lobbying purposes (\$25,000 or greater) for the previous calendar year:

- U.S. Chamber of Commerce = \$975,000
- Business Roundtable = \$75,000
- Minnesota Chamber of Commerce = \$55,000
- National Association of Manufacturers = \$30,000

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 entirely 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 any differences that may from time to time arise. 3M regularly re-evaluates its memberships in trade associations to ensure that, on balance, they continue to serve the long-term interests of the company and its stakeholders. 3M does not contribute to independent-expenditure-only political committees associated with trade associations or permit its contributions to be used for federal election activities.

Some tax-exempt organizations are organized under U.S. Internal Revenue Code §501(c)(4). Known as “social welfare” organizations, these entities may engage in lobbying activities related to their primary purpose. If any portion of any 3M dues or other contribution in excess of \$25,000 are allocated to lobbying activities, 3M will disclose here the association and amount so allocated.

3M is aware that some 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 any 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 applicable law and company policies.

Anti-Bribery Policy

3M prohibits bribery. 3M employees and any third party to whom our Code of Conduct 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 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 are permitted to represent 3M before or with their former government employer.

Contracting Services with Elected Officials

3M does not contract for services with or from sitting elected officials.

Updated August 2023



2023 3M Political Action Committee (PAC) Board

Board of Directors

- Chris Goralski, Chair
Group President, Safety & Industrial Business Group
- John Banovetz
Executive Vice President, Research & Development
Chief Technology Officer
- Garfield Bowen
Vice President, Social & Environmental Justice
- Gina Buccellato
Vice President, Research & Development, Corporate Research Analytical Lab
- Courtney Enloe
Senior Vice President, Chief Litigation Counsel, Deputy General Counsel & Legal
Subject Matter Expert
- Brian Meyers
Vice President, Global Business Leader, Regulatory Strategy
- Kevin Rhodes
Executive Vice President, Chief Legal Affairs Officer
- Rebecca Teeters
Senior Vice President, Global Chemical Operations

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- Advisor to the Board: Ed Kaleta, Senior Vice President, Government Affairs
- Board Staff:
 - Maria Pignataro, State Government Affairs
 - Tracy Tennessen, Treasurer

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2023 Corporate Contributions to US State and Local Candidates and Committees (up to July 2023)

Candidate/Committee	Amount	State Reference
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No corporate contributions made in 2023.

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2022 Corporate Contributions to US State and Local Candidates and Committees

Candidate/Committee	Amount	State Reference
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No corporate contributions made in 2022.

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2021 Corporate Contributions to US State and Local Candidates and Committees

Candidate/Committee	Amount	State Reference
California Latino Legislative Caucus Foundation	\$30,000	CA
California Legislative Black Caucus	\$30,000	CA
LGBT Caucus Leadership Fund	\$30,000	CA

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2020 Corporate Contributions to US State and Local Candidates and Committees

Candidate/Committee	Amount	State Reference
Harvesting Opportunity	\$1,500	IA
Iowa First Fund	\$1,500	IA
Senate Republican Campaign Committee	\$1,000	SD
House GOP PAC	\$1,000	SD
Bluestem Initiative	\$500	SD
The Majority Project	\$500	SD
Republican Assembly Campaign Committee	\$2,000	WI
Committee to Elect a Republican Senate	\$2,000	WI

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2019 Corporate Contributions to US State and Local Candidates and Committees

Candidate/Committee	Amount	State Reference
Landry for Louisiana	\$2,000	LA

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2018 Corporate Contributions to US State and Local Candidates and Committees

Candidate/Committee	Amount	State Reference
Committee to Re-Elect Assemblyman Joseph Morelle	\$1,000	NY
Orr for Senate Committee	\$2,000	AL
Terri Collins' Campaign Fund	\$1,000	AL
Steve Marshall for Alabama	\$500	AL
Friends of Hansen	\$500	DE
Move Michigan Forward	\$500	MI
Empowering Michigan's Future	\$1,000	MI
The West Michigan Community Preservation Fund	\$500	MI
Chris Sununu for Executive Council	\$1,000	NH
Republican Assembly Campaign Committee	\$3,000	WI
Committee to Elect a Republican Senate WI	\$3,000	WI
Michigan Made Great Fund	\$500	MI
Craig Coughlin for Assembly	\$1,000	NJ
Louis Greenwald for Assembly	\$500	NJ
Sweeney For Senate	\$1,000	NJ
New York State Senate Republican Campaign Committee	\$500	NY
New York State Senate Democratic Campaign Committee	\$500	NY
New York State Democratic Assembly Campaign Committee	\$500	NY
Andrew Cuomo 2018	\$2,500	NY
Lujan Grisham Inaugural Committee	\$2,500	NM

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2023 Contributions to 527 Organizations (up to July 2023)

Organization Name	Amount
Republican State Leadership Committee	\$25,000
Democratic Governors Association	\$50,000

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2022 Contributions to 527 Organizations

Organization Name	Amount
Democratic Attorney General Association	\$50,000
Democratic Governors Association	\$50,000
Democratic Legislative Campaign Committee	\$25,000
GOPAC	\$20,000
Republican Attorney General Association	\$80,000
Republican Governors Association	\$55,000

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2021 Contributions to 527 Organizations

Organization Name	Amount
California Issues Forum	\$15,000
Democratic Legislative Campaign Committee	\$25,000
GOPAC	\$35,000
Republican State Leadership Committee	\$25,000
State Government Affairs Council	\$6,500
State Legislative Leaders Foundation	\$42,500
Council of State Governments	\$51,000

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2020 Contributions to 527 Organizations

Organization Name	Amount
Democratic Attorney General Association	\$100,000
Democratic Governors Association	\$50,000
Democratic Legislative Campaign Committee	\$25,000
GOPAC	\$50,000
Republican Assembly	\$2,000
Republican Governors Association	\$74,500
Republican State Leadership Committee	\$25,000
State Government Affairs Council	\$9,185
National Governors Association	\$60,000

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2019 Contributions to 527 Organizations

Organization Name	Amount
Republican Governors Association	\$37,000
Democratic Governors Association	\$50,000
National Governors Association	\$55,000
Republican State Leadership Committee	\$30,000
Democratic Legislative Campaign Committee	\$25,000
GOPAC	\$35,000
Republican Attorney Generals Association	\$100,000
Democratic Attorney Generals Association	\$25,000
State Government Affairs Council	\$9,880
Conference of Western Attorneys General	\$30,000
National Conference of State Legislators	\$2,500
State Legislative Leaders Foundation	\$47,500
Republican Legislative Campaign Committee	\$5,000
California Issues Forum	\$15,000

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2018 Contributions to 527 Organizations

Organization Name	Amount
Republican Governors Association	\$53,000
Democratic Governors Association	\$30,000
Republican State Leadership Committee	\$25,000
Democratic Legislative Campaign Committee	\$25,000
GOPAC	\$10,000
Republican Attorney Generals Association	\$70,000
Democratic Attorney Generals Association	\$15,000

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Document Type	Policy
Organization	Legal Affairs and General Counsel
Sub Category	Government Contract Compliance
Geographic Scope	Global
Title	Hiring Former and Current Government Employees or Their Relatives Policy
Applies To	This Policy applies globally to all employees and non-employees on assignment at 3M ("3M Workers").
Introduction and Background or Purpose	Hiring or discussing possible employment with former and current government employees or their relatives could create the perception, even if inaccurate, 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. To avoid the appearance of improper influence, it is important to follow this Hiring Former and Current Government Employees and Their Relatives Policy.
Requirements or Expectations	<p>Overall responsibility for compliance with this document is assigned to the business unit or subsidiary that is using this procedure, policy, standard, or work tool.</p> <p>The laws and regulations that govern the recruitment and employment of former and current government employees or officials are frequently complex. Applicable laws and regulations may:</p> <ol style="list-style-type: none"> 1) place restrictions on discussions of employment opportunities; 2) prohibit hiring them for a certain period of time; and/or

3) place restrictions for certain periods of time on the type of work they may perform for or on behalf of 3M after they have been hired.

3M Workers must:

- Comply with all laws and regulations concerning the recruitment and employment of former and current government employees or their relatives. .
- Consult with the business unit's assigned legal counsel, or if it is a U.S. hire, consult with the Government Contract Compliance Department.
- Obtain prior clearance from 3M Human Resources staff before discussing possible 3M consulting or employment or making offers to hire former or current government employees or their relatives.

Relatives of Government Officials may be hired by 3M. However, to avoid the appearance of bribery under the U.S. Foreign Corrupt Practices Act (FCPA) and local laws, in addition to the above, special care must be taken when an applicant is the close relative of a Government Official who is in a position to influence a decision related to the purchase, prescription, or use of a 3M product or 3M service, or to any other governmental action that would benefit 3M's business. Offering employment to obtain a benefit is a violation of the law and this Policy.

Relatives of a Government Official may be hired only if:

- 1) the position was properly approved with a legitimate business purpose and not created as a special position for the relative;
- 2) the individual hired meets standards and qualifications that apply to all individuals that 3M hires for similar roles; and
- 3) the individual hired complies with the conflict of interest procedures 3M expects of all employees.

It is a violation of the law and this policy to offer a candidate a position based on their ability to influence a decision whether directly or indirectly through a family member.

Local Practice

3M subsidiaries and U.S. divisions and functions may, at their discretion, supplement this Policy with local requirements or procedures that are more stringent than the requirements in this Policy to comply with local law, or to define local business customs. Please note that where a local requirement exists, it must be in complete alignment with this global Policy, 3M's Code of Conduct and local law.

United States Government Employees

In the United States, applicable laws and regulations vary according to the status of the U.S. government employee. Each situation must be considered on a case-by-case basis. Human Resources and the Government Contract Compliance Department in the U.S. have a collaborative process in place to disclose and consider relevant information.

Individuals failing to comply with these requirements will be subject to discipline, up to and including termination of employment or the business relationship with 3M, unless prohibited by local law.

Additional Elements

DEFINITIONS:

Government Official is broadly defined to include a range of individuals, including:

- Government employee or elected or appointed official;
- Political party;
- Candidate for political office (even if not currently in office);
- Employees of a government or agency (police, tax and customs inspectors);
- Professors who work at state-run universities;
- Health care professional (e.g., doctor, nurse, dentist, hospital administrator) who works in a public or government-sponsored health care program (e.g., state-owned university hospital, government-funded dental program);
- Consultant, speaker or advisor retained by 3M who is a government employee;

- Government employee who benefits from a 3M research grant;
- Official or employee of quasi-public or non-governmental international organization (sometimes referred to as “NGOs”) such as the United Nations, Red Cross/Red Crescent, International Monetary Fund and the World Bank; and
- Employee of a quasi-public agency and other companies or organizations partly or wholly owned or controlled by a government.

Relatives is defined to include spouse, child, child-in-law, parent, sibling, aunt, uncle, niece and nephew.

Code of Conduct

BE HONEST: Doing Business with Government Agencies and Contractors
BE FAIR: Anti-Bribery
BE LOYAL: Conflict of Interest
