

3M in the United Kingdom: Anti-Bribery Policy – A Guide for New 3M Employees and 3M Contingent Workers

Applicability

This policy:

- applies to all those acting on behalf of 3M in the UK and anyone doing business with 3M in the UK;
- relates to business activities with any individuals, private commercial organisations, national or foreign governmental or public sector bodies or other (quasi-) international or supranational bodies;
- applies in addition to other existing 3M worldwide anti-bribery policies.

Introduction

It is 3M worldwide policy to comply with all applicable anti-corruption and other laws wherever 3M operates, and to reflect all transactions fully and accurately on 3M's books and records. Accordingly, 3M will not offer, give or receive any bribes, corrupt payments or other inducements of any kind whether directly or indirectly through any third party. 3M needs to be satisfied that its suppliers, sales channels, agents, representatives, consultants and other relevant business partners ("Representatives") will achieve and maintain equivalent standards of legal compliance and integrity and themselves take adequate measures to prevent bribery and corruption whenever and wherever they operate on 3M's behalf.

The Nature of Bribery

Bribery take many forms, including the provision directly or indirectly of cash, anything of value or any monetary, financial or other advantage to someone in order to gain business advantage or induce them to do or not do something improperly or to reward them for improper performance after the event. It involves influencing officials in the exercise of their functions. There is no limit in value of a bribe. It is irrelevant that the recipient of a bribe is not the person whose performance is affected.

Higher Risk Areas

Certain higher risk areas of activity require a greater level of management scrutiny and oversight. The following are higher risk areas determined by 3M to need prior management approval under guidance from 3M Legal Affairs and/or 3M Compliance:

- any payments or benefits for national or foreign government or public sector officials;
- business involving the use of agents, consultants or intermediaries;
- business relationships involving payments or other advantages to third parties;
- payment for hospitality, promotional offers, travel, accommodation, expenses or gifts exceeding 3M's published limits;

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- making political or charitable donations or contributions of any kind;
- making small facilitating payments to obtain routine official actions (even though legally acceptable in some countries);
- any situation where there is a history of corruption;
- proposed off-invoice or over-invoicing transactions; and
- situations where a party is reluctant to take 3M requested action to prevent corruption.

Compliance

3M personnel will:

- not by act or omission, authorise, offer, promise or give a bribe, or request, agree to, or accept a bribe or create the impression that any of those things will or may occur;
- follow the mandated 3M procedures designed to prevent bribery in regard to risk assessment, due diligence, approval, reporting and documenting transactions;
- promptly report to 3M any known or suspected instances of bribery by 3M personnel or those doing business on 3M's behalf and cooperate with any investigation into the matter. Reporting a possible impropriety must never serve as a basis for retaliation against the 3M personnel reporting the matter; and
- take steps to require that any Representative engaged on 3M's behalf conducts 3M business under equivalent standards of bribery prevention and to the highest ethical and professional standards.

Please sign, print your name and date this document below, to confirm your understanding of this document and to acknowledge that whilst at 3M you will always act in compliance with the requirements contained in this document.

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Signed

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Print name

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Date