

The logo features the 3M brand name in red, followed by the tagline "Science. Applied to Life.™" in white text.

**3M** Science.  
Applied to Life.™

# Be 3M

Ethics & Compliance

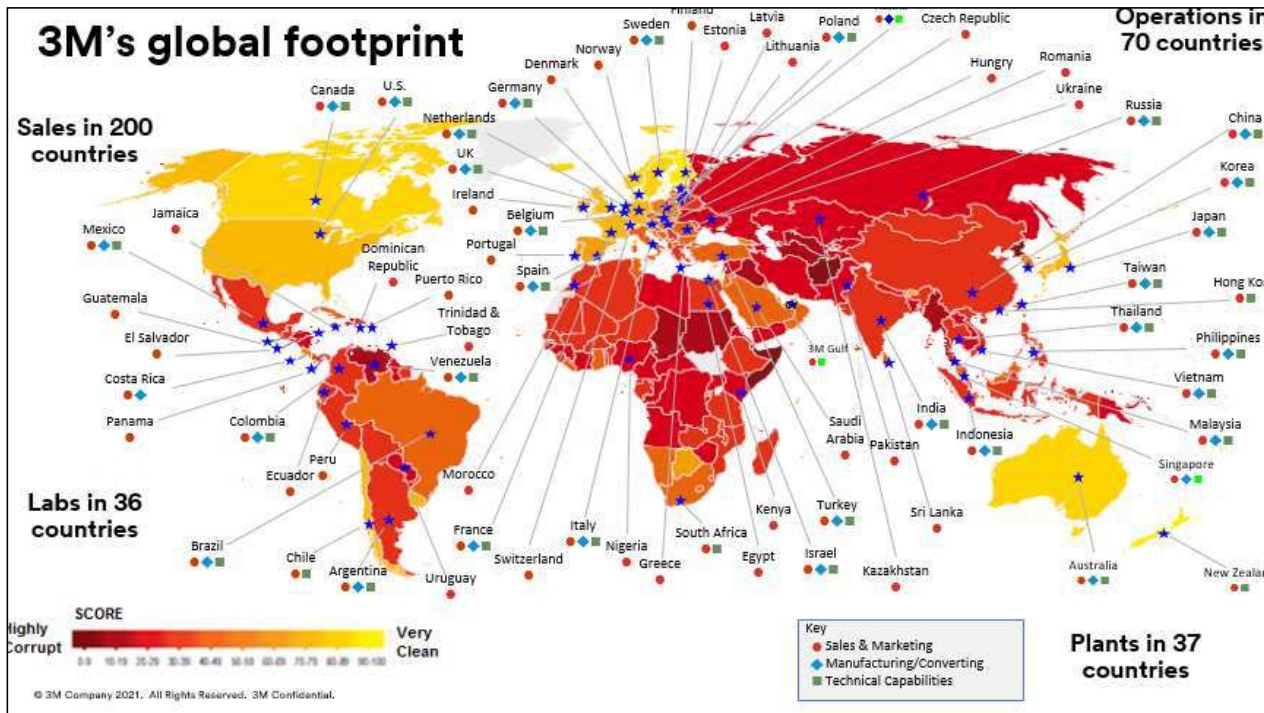
## Amcham Foro Compliance 2022 E&C Challenges and Lessons Learned

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# 3M Overview

# 3M at a glance



- Sales in nearly every country
- \$35.2 billion in sales
- Four business groups
- 95,000 3Mers globally
- 129,000 patents
- 100+ straight Years of dividends
- One of 30 companies on the Dow Jones Industrial Index










# External trends driving challenges



Favorable to corporations



Risk Direction

Trends	Risk	Impact
Remote Work, Technology, Data Protection	 	<ul style="list-style-type: none"> <li>Continued / increased remote work -- fraud risk due to inability to monitor/control fraudulent behavior.</li> <li>Adapt investigations</li> <li>Increased attention and enforcement actions related to corporate use of third-party messaging applications (i.e., WeChat, WhatsApp)</li> <li>Deterioration of company culture due to lack of connection; “quiet quitting”</li> <li>Positive : Data &amp; Technology also bring opportunity for risk mitigation</li> </ul>
Third Party and 4 <sup>th</sup> Party risk		<ul style="list-style-type: none"> <li>Increased usage of sub-contractors and risk related to other indirect relationships</li> </ul>
Supply Chain Challenges –or - Ongoing pandemic/endemic Impact		<ul style="list-style-type: none"> <li>Lead time issues</li> <li>Inability to import vital products</li> <li>Raw materials scarcity</li> <li>Resulting in increased pressure to deliver</li> </ul>
Uncertain Economy, Recession		<ul style="list-style-type: none"> <li>Internal and external pressure to improve performance; need to reduce operating costs; metric-driven behavior – high performance with high integrity should be the goal</li> </ul>
Enforcement	 	<ul style="list-style-type: none"> <li>DOJ emphasis on corporate crime demonstrate that enforcement continues</li> <li>Focus on individual accountability remains.</li> <li>Need for increased pace of investigations</li> <li>Compensation structures that promote compliance</li> <li>More clarity around use of monitors and dated conduct</li> </ul>

# Aligning 3M's Compliance Program to Guidance

- 3M's Compliance Program is designed to meet and exceed global standards, including DOJ's guidance
- The Program is continually adapted to meet the evolving needs of the company's global footprint

<b><i>Elements of a Well-Designed Program:</i></b>	<b><i>Applied earnestly in good faith (i.e. adequately resourced and empowered to function effectively?) :</i></b>	<b><i>Demonstrating the Compliance program works in practice</i></b>
<ul style="list-style-type: none"> <li>• Risk Assessment</li> <li>• Policies &amp; Procedures</li> <li>• Training &amp; Communications</li> <li>• Confidential Reporting Structure &amp; Investigation Process</li> <li>• Third Party Management</li> <li>• Mergers &amp; Acquisitions</li> </ul>	<ul style="list-style-type: none"> <li>• Commitment by Senior and Middle Management</li> <li>• E&amp;C Autonomy and Resources</li> <li>• Incentives &amp; Disciplinary Measures</li> </ul>	<ul style="list-style-type: none"> <li>• Continuous Improvement, Periodic Testing &amp; Review</li> <li>• Investigation of Misconduct and Non-compliance</li> <li>• Analysis &amp; Remediation of Any Underlying Misconduct</li> </ul>

**GRACIAS!**  
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