

Code of Business Conduct for Suppliers



Seek **Together**™

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The Dow logo is a red diamond shape with the word "DOW" in white, bold, sans-serif capital letters inside. A small registered trademark symbol (®) is located to the right of the diamond.

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Introduction



Vision

Dow aims to become the most innovative, customer-centric, inclusive, and sustainable materials science company in the world. Our goal is to deliver value growth and best-in-class performance, while supporting the transition to a more sustainable and healthy society. Issues such as climate protection, circular economy and safer materials are central to both our license to operate and our future growth. Dow recognizes the urgency to solve these complex problems. We are living with the impacts of climate change. We're seeing plastic waste in our oceans. These issues are top of mind for many, from consumers to investors, even our children.

For Dow, sustainability is a permanent journey of improvement and seeing new trends on the horizon. In 2020, we accelerated our sustainability commitments and announced new targets around climate protection and a circular economy. Through our “protect the climate” target, we aim to reduce our net annual carbon emissions by 5 million metric tons by 2030, a 15% reduction from our baseline. And by 2050, Dow intends to be carbon neutral in line with the Paris Agreement. Getting there isn't going to be easy. To achieve true carbon neutrality, we need step-change technology and step-change thinking. Already, we're making progress.

Our “close the loop” target reflects our commitment to work directly with our customers, brand owners and the value chain to redesign and promote reusable or recyclable packaging applications, like our RecycleReady Technology for packaging applications. Our “stop the waste” target is our commitment to collaborate with stakeholders and invest in key technologies and infrastructure that significantly increase global recycling.

To reach our goals, Dow needs collaboration, especially with our value chain. It will take multiple stakeholders across a complex value chain working together to find solutions that capture the full value of our materials while retaining top ESG performance. ESG performance means going beyond the need to be environmentally and socially responsible today; top performance also making decisions today that sow the seeds for the low carbon, circular future.

We encourage our suppliers to proactively join us on the path towards accomplishing Dow's ambition. This document will define the guidelines we require our suppliers to follow, but also suggest more progressive practices that align with our approach to sustainability.

Thank you for being a part of Dow's sustainability journey!





Purpose

This Code of Business Conduct for Suppliers (henceforth, the Supplier Code) follows the principles of the United Nations Global Compact and is organized in three sections: Environment, Society and Governance.

Dow is committed to the **mandatory** principles set forth in this Supplier Code and expects its suppliers to be as well. Adhering to the mandatory requirements specified below are considered non-negotiable prerequisites to any collaboration with Dow.

We are also dedicated to continuous improvement and will favor collaborating with our supplier partners who not only adhere to the mandatory requirements but also apply **best practices** as outlined below. These principles reflect Dow's progressive vision on ESG and may become mandatory in the future.

We also know that sustainability is an ever-evolving journey. As such, the Supplier Code will continue to evolve over time, and expect our suppliers to come along with us on this journey to a more sustainable future. To that end, please note the date this document. Dow reserves the right to modify, revise, or alter this Supplier Code at its sole discretion at any time.

Compliance

The application of this Supplier Code in any particular country or jurisdiction shall conform to all applicable laws, directives, or regulations. In cases where the principles set forth in this Supplier Code exceed the requirements of the law, Suppliers are still required to follow the Supplier Code where it is legally permissible.

Dow expects suppliers to implement systems and controls to promote compliance with applicable laws and the principles set forth in this Supplier Code, including policies, training,

monitoring, and auditing mechanisms. Suppliers are also expected to inform their employees of the principles set forth in this Supplier Code.

Suppliers must apply these or similar principles to the subcontractors and suppliers they work with in providing goods and services to Dow.

Direct suppliers shall conduct risk assessment of their Supply Chain and provide Dow with visibility regarding risks and mitigation strategies.

Suppliers should make reasonable efforts to disclose topics regarding impact on the environment and on social issues, for example on a website or a publicly available report. The most important issues to Dow are:

- Climate change mitigation, waste reduction and materials safety
- Health and safety of employees and the local community
- Respect for human rights

Accountability

Dow expects our supply chain partners to maintain necessary documentation to demonstrate compliance with the principles stipulated in this Supplier Code and reserves the right to assess, monitor and audit suppliers' compliance with this Supplier Code. Collaboration with suppliers who are not in compliance with this Supplier Code may be terminated and/or precluded from consideration of future business. Suppliers must promptly implement corrective actions. Dow may assess compliance via organizations like "Together for Sustainability" (TfS) – an initiative of multinational chemical companies to engage their supply chains and other stakeholders to advance sustainable development. We expect our suppliers to cooperate with such requests should they arise.

Environment

Dow is accelerating our actions to protect people and the planet based on understanding the life cycle of our products: their sources of energy and feedstocks, manufacturing processes, uses and applications, and how they are treated after use. Our ESG program encompasses all aspects of the environment, including preserving natural resources, water conservation, renewable energy uptake, and the circular economy.

We expect our suppliers to do the same according to the following core principles.



Identify key issues and set targets for continuous improvement

Dow has identified areas where we believe we can make the biggest difference and drive industry-wide change - climate protection, circular economy, and safer materials. To that end, we have adopted targets to achieve carbon neutrality of Dow's entire ecosystem by 2050, to collaborate to recycle or reuse of 1 million tons of plastic waste by 2030, and to enable the recycling or reuse of 100% of our products sold into packaging by 2035. Our ambitions extend beyond our own operations to our upstream and downstream value chain. We track our progress towards these targets through ever-evolving ESG metrics, and supplier ESG data is a key component of this effort.

Mandatory

Supplier must take actions to track and continuously improve their environmental performance across all of their operations, products, and services. Suppliers should quantify and report meaningful ESG metrics following established methodologies like the Greenhouse Gas Protocol, Global Logistics Emissions Council Framework, World Business Council for Sustainable Development Pathfinder Framework, and the Global Reporting Index that they can continually measure over time.

Best practice

Dow will favor suppliers that set near and long-term targets to achieve carbon neutrality, eliminate plastic waste, and other concerns specific to the supplier's operations and supply chain. Further, Dow recommends that suppliers publicly disclose their ESG metrics and goals via platforms like CDP and Ecovadis, beginning with the key climate metrics of annual scope 1, 2 and 3 carbon emissions and product carbon footprints.

Proactively manage environmental risks

Dow leads in developing societal blueprints that integrate public policy solutions, science and technology, and value chain innovation to facilitate the transition to a sustainable planet and society. For example, Dow is a pledged partner of Operation Clean Sweep, proactively working to prevent pellet, flake, and powder loss to the marine environment.

Mandatory

Suppliers must proactively identify, quantify, and address environmental risks and impacts within the production, distribution, and transportation process, as well as through the entire life cycle of their products and services. In particular, Logistics and External Manufacturing suppliers are required to adopt pellet loss reduction programs such as Operation Clean Sweep.

Best practice

Dow will favor suppliers that anticipate regulatory trends and respond to market requests for product sustainability.

Promote environmental responsibility

Protecting people and the environment is a part of everything Dow does and every decision we make.

Mandatory

Each of Dow's suppliers has a responsibility to ensure that its products and operations meet applicable government or international standards, whichever are more stringent. Suppliers must have systems in place to ensure safe management of waste, air emissions, and wastewater discharges.

Best practice

Dow will favor suppliers that seek ways to minimize the use of nonrenewable resources, use all resources more efficiently, and minimize the environmental impact of their operations.

Adopt environmentally friendly technologies and systems



Dow is cultivating a societal mindset shift on the value and necessity of incorporating diverse perspectives and collaborations to address global challenges. Innovating, implementing, and scaling new technologies and systems to reduce environmental impacts, accelerate the clean energy transition, and advance the circular economy is a core part of this shift.

Mandatory

Dow expects its suppliers to develop, adopt and promote cleaner production processes, pollution prevention technologies, leakage monitoring technologies using next generation technologies wherever possible.

Best practice

Dow will favor suppliers that participate in and promote collaborations to develop innovative technology and systems solutions that work across industries.



Social

Respect for People is a core Dow value. We encourage our suppliers to hold themselves to the highest standards in ensuring respect for the human rights of their employees and treat them fairly, in accordance with all applicable laws.

Respect freedom of association and collective bargaining

Mandatory

Suppliers will respect employees' lawful right of free association, as well as their lawful right to join, form, or not to join a labor union or otherwise engage in collective bargaining.

No forced and compulsory labor

Mandatory

Suppliers will not use forced, compulsory or involuntary labor, including prison labor, servitude, indentured labor, bonded labor, slave labor, human trafficking or any other forms of involuntary labor

No child labor

Mandatory

Suppliers will comply with all applicable child labor laws and will ensure not to employ individuals under the legal local minimum age to work.

Do not discriminate



Mandatory

Suppliers will not discriminate in any condition of employment on the basis of age, race, color, national origin, sex, sexual orientation, gender identity or expression, physical or mental disability, religion, union membership, military or veteran status, marital or familial status, or any other personal characteristic unrelated to job performance or other factor protected by applicable law.

Prevent harassment and abuse of labor

Mandatory

Suppliers will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment, bullying, or any other form of abuse and will comply with all applicable laws on harassment and abuse of employees. Reports of harassment, bullying, and/or abuse will be treated seriously and respectfully. Employees reporting non-compliance to these aspects should not suffer retaliation and be provided with transparent, fair and confidential procedures that result in swift, unbiased and fair resolution of difficulties which may arise as part of the process.

Advance supplier diversity

Best practice

Suppliers should foster and practice a culture of inclusion and be working to improve the overall diversity of their workforce. They are encouraged to have an active supplier diversity program and support the businesses and communities where Dow operates by engaging with small businesses, minority- and woman-owned businesses and other diverse categories. Dow strongly recommends establishing systems for tracking diverse spend and reporting this information to Dow.



Sourcing of conflict minerals

Mandatory

Suppliers may not supply products that contain tin, tantalum, tungsten or gold (the “Conflict Minerals”) that directly or indirectly finance, or benefit armed groups and cause human rights abuses.

Mandatory

Supplier will not source the Conflict Minerals from the Democratic Republic of the Congo or the adjoining countries (the “Covered Countries”) in a manner which directly or indirectly finances or benefits armed groups in the Covered Countries. Supplier will source Conflict Minerals from smelters that have been validated as compliant with the Responsible Minerals Assurance Process of the Responsible Minerals Initiative. Supplier commits to abide by all applicable laws and regulations related to Conflict Minerals and agrees to provide all necessary information requested by Dow concerning products supplied by Supplier to enable Dow to complete its reasonable country of origin inquiries and due diligence with respect to Conflict Minerals.

Provide a healthy and safe workplace

Mandatory

Suppliers will comply with all applicable workplace health and safety laws. Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, work procedures, protection from exposure to hazardous materials and appropriate personal protective equipment. All employees must have access to clean, safe, and reasonable working conditions. Their facilities (including operations and dormitories) must be clean, healthy and safe, with adequate access to potable drinking water, sanitary facilities, fresh air and lighting. Suppliers will provide training on work process safety as well as emergency response procedures.

Protect communities during production and transportation

Mandatory

Suppliers will comply with all applicable transportation laws. Suppliers will have systems in place to ensure safe and secure transportation of materials. This includes consideration for selection of logistics service providers (including warehouses and terminals), selection and inspection of transport containers, loading and unloading of transport containers, securing and sealing of transport containers, and responding to emergencies.

Mandatory

Suppliers will have systems in place to monitor, analyze, report and communicate any safety incidents in their production facilities. Risk assessments of those will be conducted proactively and regularly. Suppliers will take specific, proactive steps to avoid interrupting Dow supply lines.



Governance

Dow expects its Suppliers to conduct their business as Dow strives to conduct its business: ethically and in compliance with the law.

Increase awareness and provide training

Best practice

Suppliers are encouraged to raise awareness of this Supplier Code among their staff and workers and to provide them with training on the business ethics, especially in the context of their specific jobs (e.g., gift giving and receiving for procurement staff).



Avoid conflicts of interest



Mandatory

Suppliers will avoid any interaction with a Dow employee that may conflict, or appear to conflict, with that employee acting in the best interests of Dow. This also includes offering payments or employment opportunities to Dow employees. Any and all conflicts of interest, of which the supplier is aware, in any business dealings with Dow, including but not limited to any ownership or beneficial interest in a supplier's business by a government official, representative of a political party, or a Dow employee shall promptly be declared to Dow to allow for appropriate action.

No bribery or corruption

Mandatory

Suppliers will not engage in any form of commercial bribery, corruption, extortion, fraud, or otherwise offer any incentive to any Dow employee or Dow employee's family or friends in order to obtain or retain Dow business. Suppliers will comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and all other local or otherwise applicable laws dealing with the bribery of government officials and maintain adequate procedures to prevent unlawful behavior in all commercial dealings undertaken by the supplier.

Mandatory

Any business entertaining or hospitality will be kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way Dow's business decisions. Suppliers will respect that Dow employees do not give or accept any gift, entertainment, or favor that could compromise or raise doubts about the neutrality of the decisions made by Dow or the supplier. Suppliers are aware of and adhere to our requirements.



Comply with fair competition and accurate accounting

Mandatory

Suppliers will comply with all applicable laws regarding fair competition and antitrust and shall not engage in any form of money laundering or knowingly accept funds acquired through illicit means. No confidential information in the supplier's possession regarding Dow shall be used to engage in or support insider trading. All business and commercial dealings shall be transparently performed and accurately recorded in the supplier's books and records. Suppliers will keep - and provide to Dow upon request - exact records related to fair competition and accurate accounting of all matters related to the supplier's business with Dow.

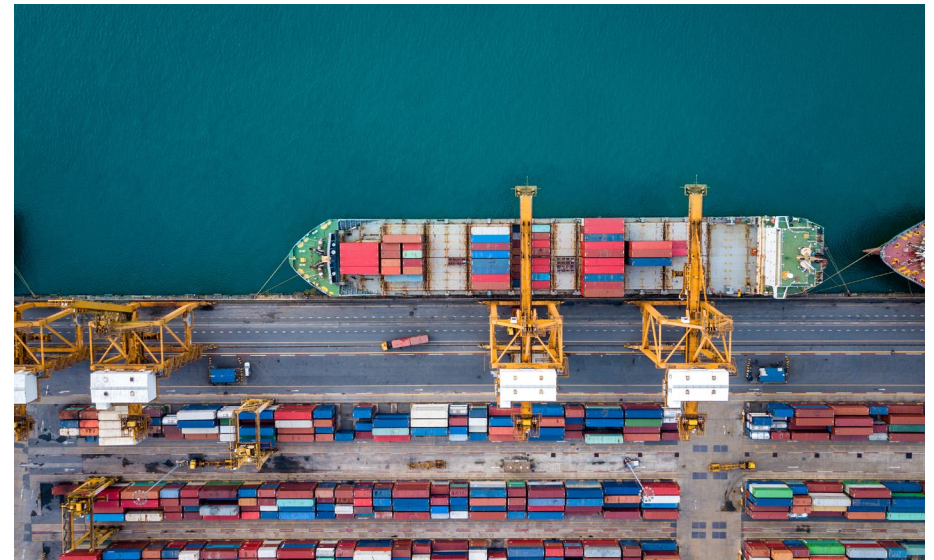
Protect information

Mandatory

Suppliers will protect Dow's confidential information, including personal information, and act to prevent its misuse, theft, fraud or improper disclosure and will comply with all applicable data privacy laws. Suppliers shall safeguard and respect Dow's intellectual property. Suppliers must take all due care in handling, discussing or transmitting sensitive or confidential information that could affect Dow, its employees, its customers, the business community or the general public. Any confidential information and/or licensed intellectual property shall only be used for the intended and designated purpose.

Best practice

Suppliers shall have a proper level of cybersecurity in their systems, communications, etc. to avoid and mitigate potential cyber risk, especially those that can also put in risk Dow during our commercial interaction. Suppliers shall perform periodic cybersecurity risks and vulnerability assessments, incl. the use of qualified cybersecurity professionals as appropriate. There should be an established and updated Business Continuity Plan and Cybersecurity Continuity Plan, specifying the implemented controls and security, a communication plan, and a robust recovery program. Suppliers are encouraged to raise cybersecurity awareness by holding discussions with their teams.





Respect international trade and sanctioned parties

Mandatory

Suppliers will comply with all applicable laws governing international trade. Suppliers will provide Dow with documentation necessary for Dow to comply with import/export laws, will adhere to any applicable trade sanctions and embargoes, and will implement practices and procedures to ensure security of their supply chain under applicable regulations. If applicable, Suppliers will provide documentation to support the eligibility of their product under a Free Trade Agreement.

Suppliers may not use any supplier of services, materials or equipment which (a) is located in any country subject to United Nations, US or EU economic sanctions (or acting on behalf of persons or entities located in such countries) or (b) appears on lists of restricted or prohibited persons maintained by the United Nations, US, EU or the country of manufacture, origin/destination of the cargo. Shippers shall screen all vessels, containers and other equipment and their owners to ensure compliance with this requirement.

Advance supply chain traceability

Mandatory

Suppliers keep adequate records on their direct suppliers and are able to trace volumes back to the supplying sites

Best practice

Suppliers actively engage their supply chain in order to increase transparency and traceability therein and is able to trace back commodities to their origin. Suppliers can further advance traceability by engaging in collaborations with industry groups, NGOs, and other stakeholders.

Report misconduct and anti-retaliation

Best practice

Suppliers who believe that a Dow employee or anyone acting on behalf of Dow has engaged in illegal or otherwise improper conduct with respect to their business with the supplier should report the matter to Dow. Suppliers should also report any potential violation of this Supplier Code. Reports may be made through the Dow EthicsLine (<https://secure.ethicspoint.com/domain/media/en/gui/23573/index.html>). A supplier's relationship with Dow will not be affected nor will the supplier be retaliated against in any way by an honest report of potential misconduct.

Furthermore, Suppliers are encouraged to establish means of reporting misconduct without risk of retaliation within their respective organizations.





Seek Together™

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