We are committed to minimizing our own footprint and delivering innovations that help our customers, as well as the rest of world, do the same.
Receiving a high grade on a GRI Sustainability Report is not easy. Dow has been publishing this report for the past seven years, with the assistance of ERM and GRI. For this externally verified application level, the company gives itself the first grade, which is mandatory. The second set of grades is optional and given by the third-party verifier, ERM, and then by GRI. During the review period, ERM identified a number of issues that were discussed and subsequently addressed by Dow in the final draft of the GRI Report.
Finding what is of interest to you.

Recognizing the complexity of this report, we offer the following to help you navigate to the content of your interest.

**Special Interest Highlights.**
Following this page is a high-level table of contents that will help you understand the color-coded organizational structure of the report.

**Read Me First.**
Only have two minutes? Not familiar with Dow? Busy readers may find this two-page summary the best way to acquire perspective on Dow and its commitment to sustainability.

**Hyperlinked Index.**
At the back of the report a detailed index is available in the GRI G3 nomenclature with hyperlinks by item that will move you to the relevant page of this report.

**Additional Links Outside This Report.**
You will find more detail about the topics discussed by using relevant links that are embedded into this document for your convenience.
Special Interest Highlights
Unlike a typical table of contents, ours is designed to help you search for topics of special interest.

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The magnifying glass indicates a topic or section of special interest. Check it out.
For the seventh year, The Dow Chemical Company is providing a Global Reporting Initiative (GRI) Report. This is the third year using the GRI G3 guidelines. The 2009 GRI Report is designed as a supplement to other documents that may also be of interest:

- The Elements of Success, 2010 Databook
- Dow 2009 Annual Report
- Dow Code of Business Conduct
- Dow 2009 10-K
- Dow 2010 Annual Meeting Proxy Statement
- Executive Summary, Dow Brazil Sustainability (English, Portuguese)
- Fast Facts about Dow
- For current progress on sustainability topics, see our quarterly Sustainability Goals Update.

Except as otherwise indicated by the context, the terms “Company” or “Dow” as used herein mean The Dow Chemical Company and its consolidated subsidiaries.

Dow strives to respond to all the individual items of the GRI G3 template. We believe it is important to make this information publicly available and, in addition, we want it to be useful to interested parties who may desire to use GRI indicators in a comparative way – even if that makes the report longer and the format more complex. We continue to look for opportunities to improve our GRI Report.

For an overview of progress, updated each quarter, please visit our Sustainability Reporting site on dow.com.
GRI Read Me First

This Read Me First summary provides an orientation for our sustainability report, as well as what to expect when delving into it. You’ll also find links to additional information we believe will be of interest. You are encouraged to visit our Sustainability Reporting website where updates are regularly provided. We welcome your feedback because we want to report on topics that you want to read about.

“It you can’t do it better, why do it?”
– Herbert H. Dow

It’s been more than 100 years since Herbert H. Dow uttered the words that have become the catalyst for the spirit of innovation at Dow. As part of our business of rearranging atoms and reshaping molecules to create new materials and new technologies, our innovations help contribute to a more sustainable world.

The integration of sustainability into our business was a natural step for us. Dow will always serve its communities by creating value through environmental stewardship, corporate social responsibility and economic prosperity. It’s these commitments that are an integral part of our drive for sustainability because they help our employees achieve, customers succeed, consumers live better lives, shareholders prosper and communities thrive; everything that helps create a livable and sustainable world.

Dow’s commitment to sustainability is reflected not only in our efforts to establish environmentally and socially responsible business practices across our global organization, but also by working with customers who, like us, are looking to build a sustainable future.

Responsible Operations

- Dow presents Technology Center Awards, which recognize and reward successful improvement and implementation of technology at Dow.
- Dow presents WRAP (Waste Reduction Always Pays) Awards, which recognize individuals and teams who find innovative ways to save money while reducing waste at Dow.
- Dow praised for sustainability reporting by International Investors Group (IGCC), which is the leading group for collaboration among institutional investors in Europe focused on addressing investment risks and opportunities presented by climate change.

Partners for Change

- Dow delivers clean water by reverse osmosis technology.
- U.S. Studies Centre announces the Dow Sustainability Program, which will bring together academic and policy experts from Australia and the U.S. to develop action-oriented solutions to a range of sustainability challenges concerning energy, water, food and biodiversity that are technologically innovative, commercially scalable and politically viable.
- Dow testifies on chemical management reform, which provided a perspective on chemicals management policy and reform of the Toxic Substance Control Act (TSCA) during a hearing entitled, “Business Perspectives on Reforming U.S. Chemical Safety Laws.”
- Dow unveils R&D vision in Saudi Arabia through the Dow Middle East and Africa R&D Center at the King Abdullah University of Science and Technology (KAUST).
- Dow’s Chief Security Officer provides congressional testimony on safeguarding America’s chemical facilities.
- Dow receives the 2009 Value-Based Health Award for large employer from the Institute for Health and Productivity Management (IHPM).

Innovations for Tomorrow

- Dow and Caltech announce next-generation photo voltaics research initiative.
- Dow presents “Electric Avenue” at the North American International Automotive Show (NAIAS) to emphasize our increasingly important role of chemistry in meeting the next-generation needs of the automotive industry.
- DOW™ POWERHOUSE™ Solar Shingle wins GLOBE Award for Environmental Excellence in Emerging Technology.
• Dow provides 24-Karat Water Solutions™ in India.

• Dow integrates PV thin film onto building panels. The results – driving system costs down.

Smart Solutions for Today
• Dow delivers next-generation insulation solution to meet growing energy efficiency needs.

• New technology saves Dow plant one billion gallons of water, $4 million.

• Dow building insulation products achieve Cradle-to-Cradle® certification, which permits an organization to verify and market its products’ sustainability attributes and guide future improvements.

• Dow uses formulation chemistry to reduce the VOC emission levels of paints and coatings.

HIGHLIGHTS: Three Major Accomplishments for 2009
• Our safest year ever – with a 27 percent reduction in injury rate – makes Dow 19 times safer than the overall average for U.S. manufacturing.

• Through Dow Water & Process Solutions, we helped provide more than 30 million people with clean and safe water.

• Achieved Cradle-to-Cradle Certification for Dow Building Solutions products, helping consumers understand the life-cycle impact of these offerings.

CHALLENGES: Finding Breakthroughs That Protect Our Planet
• While we made progress with our carbon capture concepts, there are challenges in bringing this new technology to commercial markets quickly.

• Dow’s businesses better understand what it will take to make our manufacturing processes and product offerings more sustainable, but we have little time remaining to double the level of sales with sustainable chemistry advantages by 2015.

• We will continue to search for projects where our innovation engine, along with collaborating partners, can achieve breakthroughs to world challenges.

Maintaining Transparency and Accountability
“Dow’s values are simple, yet powerful: Integrity, Respect for People, and Protecting the Planet. These values, along with our culture, compel us to be leaders in transparent reporting. We believe that GRI is the leading organization that can help point the way toward greater transparency that will result in further collaboration.”

Neil Hawkins, Sc.D.
Vice President
Sustainability & EH&S
The Dow Chemical Company
Q and A for More Comprehensive Understanding

What is the Global Reporting Initiative?
GRI is an organization that has pioneered the standardization of sustainability reporting through the creation of the GRI Framework. Key principles in its approach include: balance, comparability, accuracy, timeliness, clarity and reliability.

What is the GRI Framework?
The GRI framework provides a standardized approach for sustainability reporting that helps organizations transparently measure and communicate economic, environmental and social performance. For more information, visit GRI’s website or study the GRI index of topics at the end of this document.

How does Dow approach sustainability reporting?
The transparent and comprehensive use of the GRI framework creates accountability for the Company to report and improve reporting on the topics to which stakeholders should have access. We do not produce an annual brochure using selected accomplishments, but intend to serve broad stakeholder needs efficiently by creating a central repository for all relevant topics. The quarterly Sustainability Goals Update is an important supplement to our annual GRI Report focusing on timely updates and key metrics for which we have established 10-year targets.

What are Dow’s 2015 Sustainability Goals?
• Sustainable Chemistry
• Breakthroughs to World Challenges
• Energy Efficiency
• Addressing Climate Change
• Contributing to Community Success
• Product Safety Leadership
• Local Protection of Human Health and the Environment

How does “Assurance” as described in section 3.13 fit into sustainability reporting?
There are a myriad of requirements regulating the way companies communicate their financial results. When voluntarily producing a sustainability report, some companies choose to have an external review as part of the process to assure the content serves stakeholder needs and the GRI principles. When this process is successfully employed, the + designation is added to the GRI application grade. Dow’s report is an A+ report because of its completeness (A) and the use of assurance (+).

What is the United Nations (UN) Communication on Progress (COP)?
We use the Dow GRI Report as a vehicle for our Communication on Progress (COP) toward the 10 UN Global Compact Principles. The UN Global Compact is the world’s largest voluntary corporate citizenship initiative comprised of more than 4,700 companies from more than 120 countries. Dow is one of 44 companies to receive a Notable status on its COP. For more information on the UN Global Compact and its principles, visit http://www.unglobalcompact.org/.

We are hopeful that the improvements we have made to the 2009 report will make it easier for you to find and understand information of value to you. If you have any questions or suggestions, please use this email address to contact the Company. We would greatly value knowing what led you to our report and receiving comments about what you most appreciate and where you note room for improvement in the 2010 GRI Report.

Peter N. Deal (PNDeal@dow.com)
Sustainability Reporting
Strategy and Profile of The Dow Chemical Company
1. Strategy and Analysis

1.1 Statement from CEO presenting overall vision

The Dow Chemical Company

United Nations (UN) Global Compact

2009 Communication on Progress (COP)

At The Dow Chemical Company, corporate citizenship is a critical component of our goal of “Setting the Standard for Sustainability.” It means we are focused on local citizenship, sustainable product innovations, and global footprint reduction. It means contributing to community success, fostering a diverse and engaged workforce, and being accountable and responsive to stakeholders. It means our employees demonstrate their spirit and passion – the Human Element – every day by living our corporate values of Integrity, Respect for People and Protecting the Planet. It is over 112 years of Dow people and others working together to apply science and innovation to improve the human condition.

In short, “Setting the Standard for Sustainability” means we confirm daily our desire to have corporate citizenship inherent in everything we do as a global corporation, directly supporting our vision to be the most profitable and respected science-driven chemical company in the world.

Dow’s membership in the UN Global Compact – the world’s largest voluntary corporate citizenship initiative, comprised of over 4,700 companies from more than 120 countries – underscores our Company’s commitment to “embrace, support and enact” a set of core values in the areas of human rights, labor standards, the environment and anti-corruption.

Supporting the 10 principles of the Global Compact aligns with our Company values, with our Code of Business Conduct and with the broad reach of our 2015 Sustainability Goals. It also provides an opportunity for Dow to take a more active role in the world around us and to expand our collaboration with like-minded stakeholders at a level where we can truly make a difference.

Dow has many endeavors that support implementation of the UN Global Compact. Among them are:

• Our Code of Business Conduct addresses many of the ethical principles and policies created to deal with issues such as bribery, political contributions, diversity, equal opportunity, labor practices, respect in the workplace, and environment, health and safety. All directors, officers, and employees are expected to adhere to the Code of Business Conduct in the daily performance of their job responsibilities. We expect the same from our suppliers and customers. The Code of Business Conduct, as well as our human rights position statement, can be found on our Company’s website, dow.com.

“Dow’s product demand was relatively strong and our strategy was firmly on track. In that context, in July (2008), we announced a deal to purchase Rohm and Haas – another key step in our transformational strategy. This acquisition of a true specialty chemical and advanced materials company marked an historic moment in Dow’s quest to become a reliable earnings growth company. It is a great company and a fantastic opportunity to further our strategy.”

Andrew N. Liveris
Chairman and CEO, The Dow Chemical Company

112th Annual Meeting of The Dow Chemical Stockholders, May 14, 2009

• Following the success of our 10-year 2005 Environment, Health and Safety Goals, we set the bar higher with the introduction of a more ambitious, next-generation set of goals – our 2015 Sustainability Goals. These outline our commitments to not only reduce our own global footprint, but
also to drive our growth and profitability by focusing our products and innovation on helping to solve global challenges such as climate change, sustainable water supplies and human health, as well as contribute to the success of the communities in which we operate.

- Our focus on Contributing to Community Success includes conducting research to assess the quality of life in key Dow locations around the world and understand and prioritize local environmental, social and economic needs in the communities in which we operate. The research ensures that we are a good neighbor and partner in our 150 global communities.

In 2009, Dow continued to garner recognition for our transparent reporting, technology innovations and overall leadership in sustainability:

- POWERHOUSE™ Solar Shingle named one of “The 50 Best Inventions of 2009” by TIME Magazine.
- Dow China Limited named among the top 10 companies in Business Watch Magazine’s “50 Green Companies” list.
- Dow and BASF received the Institution of Chemical Engineers Innovation and Excellence Award for their jointly developed Hydrogen Peroxide to Propylene Oxide production technology.
- Dow AgroSciences received the Michigan Green Chemistry Governor’s Award for spinetoram insecticide derived from fermentation of natural soil organisms.
- Dow achieved an A+ rating for Global Reporting Initiative report for the second year in a row.
- Dow named for the ninth time to the Dow Jones Sustainability World Index.

Dow offers an integrated global training curriculum that incorporates diversity and inclusion training for employees at all levels. From new-hire orientation to mandated training for new leaders, diversity and inclusion training gives our employees the tools to cultivate an inclusive work environment.

In our communities we continue to help serve their unique local needs based on detailed surveys of residents at 10 strategic sites across the globe. The surveys identified the issues that matter most to the communities and resulted in customized programs that address education, the environment and economic success. For example:

- In Aratu, Brazil, Dow developed the ECOSMAR Project – Matarandiba Sustainable and Solidarity Economy in partnership with the Federal University of the State of Bahia. The project is designed to promote sustainable development by generating jobs and income in the Matarandiba community. First-phase initiatives include a community information center and community bank.
- In Terneuzen, The Netherlands, Dow opened a technical training pilot plant at the Regional Education Center to provide on-the-job training for the future workforce of Dow and other organizations.

In other community initiatives, Dow:

- Kicked off the construction of three “Project Hope” schools in rural areas of Sichuan Province, China, to rebuild schools damaged by an earthquake in 2008.
- Provided financial contributions, as well as polyurethane product and technology, as the leading sponsor of the Jaipur Foot project in India, which will supply artificial limbs and calipers to more than 17,000 people.
- Teamed with two non-profit organizations in South Africa to provide shelter, food and a family environment for orphans and vulnerable children affected by HIV/AIDS. Dow is assisting with operational costs and the schooling.
- Is a founding signatory of the UN Global Compact CEO Water Mandate and Caring for Climate initiatives and a member of the United States Climate Action Partnership (USCAP).

These are just a few continuing examples that not only reaffirm how Dow is supporting the 10 Global Compact principles, but also demonstrate the way in which we implement our business strategy. Participation in the UN Global Compact is an invaluable tool that helps us achieve our vision and live our values.

Andrew Liveris
Chairman and Chief Executive Officer
The Dow Chemical Company
June 16, 2010

For more information on Dow’s participation in the UN Global Compact, please contact:

R. N. (Bo) Miller (BoMiller@dow.com)
Global Director of Corporate Citizenship
1.2 Key Impacts, Risks, and Opportunities

2015 Sustainability Goals bring focus and accountability

Our 2015 Sustainability Goals, inspired by the UN Millennium Development Goals, help drive our profitable growth while addressing the challenges of water supplies, food supplies, housing, personal health, energy, climate change and protection of the environment. We are pursuing broad opportunities in the following unique goal areas, which you can learn more about in the Disclosure on Management Approach sections of this report.

- Breakthroughs to World Challenges
- Sustainable Chemistry
- Product Safety Leadership
- Addressing Climate Change
- Energy Efficiency and Conservation
- Local Protection of Human Health and the Environment
- Contributing to Community Success

Dow’s performance toward its 2015 Sustainability Goals is reported quarterly on dow.com.

2015 Goal changes and challenges

The acquisition of the Rohm and Haas Company on April 1, 2009, made it necessary to understand reporting differences and reconcile definitions used by the two companies. New targets were defined by analyzing historical and recent data from both heritage companies. In all cases, the relative improvement of the new targets compared to historical performance remains at least as aggressive as it had been before the recalibration.

Three new emissions reduction targets were established as part of the Local Protection of Human Health and the Environment (LPHHE) Goal during 2009. They bring a focus to achieve a 30 percent reduction by the year 2015 in emissions of Volatile Organic Compounds (VOCs), Nitrogen Oxides (NOx), and Priority Chemicals. We will report our 2009 progress in the second quarter 2015 Goals update, which will be available on Sustainability Reporting.

A fourth new goal is called the By-Product Synergy Goal. It is designed to find and implement opportunities that will upgrade the fate of by-products. We are well on our way to finding applications that will upgrade the fate of a total of 300 million pounds of by-products by 2015. That is equivalent to finding a better home for more than 7,000 semi truckloads of raw materials. See performance indicator EN2.

Lower operating rates in 2009 (74 percent contrasted with 77 percent and 87 percent in the two prior years) continued to cause delayed progress in our energy intensity and greenhouse gas emissions intensity. At the halfway point, these goals are desired to be operating about 12 percent more efficiently than in 2005, but energy intensity is 1 percent improved over 2005 and the greenhouse gas emissions per pound of product made has increased compared to the 2005 base year. The return to higher operating rates will restore the improvement trend, but we are challenging ourselves to find capital projects that can be in place quickly enough to help improve results in this area. We also are leveraging best practices from and to the many sites and operations that were acquired in 2009. See performance indicators EN3 and EN16.

Managing risks and opportunities aligned with sustainability

Chaired by the Chief Sustainability Officer, the Sustainability Team is composed of five senior executives and serves as the Company’s governance body for Environment, Health & Safety; Public Policy Issues; and Sustainability. This team provides direct linkage to the EH&S Committee of the Dow Board of Directors to assist them in their oversight responsibilities for Dow performance in these critical areas.

The Saudi Arabian Oil Company (Saudi Aramco) and Dow are working out final details to establish a joint venture company to construct, own, and operate a world-scale chemicals and plastics production complex in Saudi Arabia’s Eastern Province. Throughout the past three years the establishment of the Principles of Responsible Care® and the full understanding of environmental risk have been a focus of planning the joint venture. An Environmental Impact Assessment, conducted by a third-party provider, is expected to be completed in early 2011.

The Company uses a Business Risk Review Work Process to identify, evaluate and manage EH&S risks, including risks associated with possible failure of a product to perform as intended (i.e., product efficacy).

During 2009, the Company formalized a process to have business leaders review Key Performance Indicators for EH&S and sustainability performance. This ongoing process makes the business performance and the business impact on corporate improvement targets transparent at the business level. Each review session identifies at least three sustainability business opportunities and three gaps in current EH&S/Sustainability business performance.

Corporate-level identification and management of risk is also systematically accomplished using an Enterprise Risk Management approach. The Company assesses financial risks, which includes in part the potential impact of weather-related impacts, access to credit, volatility in purchased feedstock and energy costs, and pension plan related risks. Risk management results are communicated to the Chief Financial Officer on a weekly basis with
a formal annual review with the Board of Directors and its Audit Committee. See the Dow 2009 10-K report Part I, Item 1A and Part II, Item 7A for a more complete discussion of Risk Factors.

2. Organizational Profile

2.1 Name of reporting organization

The Dow Chemical Company

2.2 Primary brands, products and/or services

See the Dow 2009 10-K report for a complete description of the operating segments, including a representative listing of products for each business.

Corporate Profile

Dow combines the power of science and technology with the “Human Element” to passionately innovate what is essential to human progress. The Company connects chemistry and innovation with the principles of sustainability to help address many of the world’s most challenging problems such as the need for clean water, renewable energy generation and conservation, and increasing agricultural productivity. Dow’s diversified industry-leading portfolio delivers a broad range of technology-based products and solutions in approximately 160 countries in high growth sectors such as electronics, water, energy, coatings and agriculture. The Company’s more than 5,000 products are manufactured at 214 sites in 37 countries across the globe. The Company is organized into the following eight operating segments.

Electronic and Specialty Materials

Applications: chemical mechanical planarization (CMP) pads and slurries • chemical processing and intermediates • electronic displays • food and pharmaceutical processing and ingredients • printed circuit board materials • semiconductor packaging, connectors and industrial finishing • water purification

Coatings and Infrastructure

Applications: building and construction, insulation and weatherization, roofing membrane systems, adhesives and sealants • construction materials (vinyl siding, vinyl windows, vinyl fencing) • flexible and rigid packaging • general mortars and concrete, cement modifiers and plasters, tile adhesives and grouts • house and traffic paints • leather, textile, graphic arts and paper • metal coatings • processing aids for plastic production • tapes and labels

Health and Agricultural Sciences

Applications: agricultural seeds, traits (genes) and oils • control of weeds, insects and plant diseases for agriculture and pest management

Performance Systems

Applications: automotive interiors, exteriors, under-the-hood and body engineered systems • bedding • caps and closures • food and specialty packaging • footwear • furniture • gaskets and sealing components • manufactured housing and modular construction • medical equipment • mining • pipe treatment • pressure sensitive adhesives • transportation • vinyl exteriors • waterproofing membranes • wire and cable insulation and jacketing materials for power utility and telecommunications

Performance Products

Applications: adhesives • aircraft and runway deicing fluids • appliances • carpeting • chelating agents • chemical intermediates • civil engineering • cleaning products • coated paper and paperboard • composites • construction • corrosion inhibitors • detergents, cleaners and fabric softeners • electrical castings, potting and encapsulation and tooling • electrical laminates • electronics • flavors and fragrances • flooring • footwear • gas treatment • heat transfer fluids • home and office furnishings • industrial coatings • mattresses • metalworking fluids • packaging • sealants • surfactants

Basic Plastics

Applications: adhesives • appliances and appliance housings • agricultural films • automotive parts and trim • beverage bottles • bins, crates, pails and pallets • building and construction • coatings • consumer and durable goods • consumer electronics • disposable diaper liners • fibers and nonwovens • films, bags and packaging for food and consumer products • hoses and tubing • household and industrial bottles • housewares • hygiene and medical films • industrial and consumer films and foams • information technology • oil tanks and road equipment • plastic pipe • textiles • toys, playground equipment and recreational products • wire and cable compounds

Basic Chemicals

Applications: agricultural products • alumina • automotive antifreeze and coolant systems • carpet and textiles • chemical processing • dry cleaning • household cleaners and plastic products • inks • metal cleaning • packaging, food and beverage containers • paints, coatings and adhesives • personal care products • petroleum refining • pharmaceuticals • plastic pipe • protective packaging • pulp and paper manufacturing • soaps and detergents • water treatment

Hydrocarbons and Energy

Applications: polymer and chemical production • power
2.3 Operational structure of the organization

The ultimate authority to manage the business of The Dow Chemical Company rests with the Board of Directors. The role of the Board is to effectively govern the affairs of the Company for the benefit of its stockholders and, to the extent appropriate under Delaware corporation law, other constituencies including employees, customers, suppliers and communities in which it does business. Among other duties, the Board appoints the Company’s officers, assigns to them responsibilities for management of the Company’s operations, and reviews their performance. An independent member of the Board fills the role of Presiding Director.

The subsidiaries of the Company are listed in the Dow 2009 10-K. See exhibit 21. Information about Joint Ventures can be found in section 3.6 below.

<table>
<thead>
<tr>
<th>Operating Segments</th>
<th>Business Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electronic and Specialty Materials</td>
<td>Electronic Materials, Specialty Materials</td>
</tr>
<tr>
<td>Coatings and Infrastructure</td>
<td>Adhesives and Functional Polymers, Dow Building and Construction, Dow Coating Materials</td>
</tr>
<tr>
<td>Health and Agricultural Sciences</td>
<td>Dow AgroSciences</td>
</tr>
<tr>
<td>Performance Systems</td>
<td>Automotive Systems, Elastomers, Wire and Cable, Formulated Systems</td>
</tr>
<tr>
<td>Performance Products</td>
<td>Amines, Emulsion Polymers, Epoxy, Oxygenated Solvents, Performance Fluids, Polyglycols and Surfactants, Performance Monomers, Polyurethanes</td>
</tr>
<tr>
<td>Basic Plastics</td>
<td>Polyethylene, Polypropylene, Styrenics</td>
</tr>
<tr>
<td>Basic Chemicals</td>
<td>Chlor-Alkali/Chlor-Vinyl, Ethylene Oxide/Ethylene Glycol</td>
</tr>
<tr>
<td>Hydrocarbons and Energy</td>
<td>Hydrocarbons and Energy</td>
</tr>
</tbody>
</table>

2.4 Location of organization’s headquarters

Midland, Michigan, USA

2.5 Countries of operation

As of 12/31/2009, the Company operated 214 manufacturing sites in 37 countries. The Company's major production sites are as follows:

<table>
<thead>
<tr>
<th>Country</th>
<th>Major Production Sites</th>
</tr>
</thead>
<tbody>
<tr>
<td>United States</td>
<td>Plaquemine and Hahnville, Louisiana; Midland, Michigan; Freeport, Seadrift, Texas City and Deer Park, Texas; Marlborough, Massachusetts</td>
</tr>
<tr>
<td>Canada</td>
<td>Fort Saskatchewan, Alberta</td>
</tr>
<tr>
<td>Germany</td>
<td>Boehlen, Leuna, Rheinmuenster, Schkopau, Stade</td>
</tr>
<tr>
<td>France</td>
<td>Drusenheim</td>
</tr>
<tr>
<td>The Netherlands</td>
<td>Temeu zen</td>
</tr>
<tr>
<td>Spain</td>
<td>Tarragona</td>
</tr>
<tr>
<td>Argentina</td>
<td>Bahia Blanca</td>
</tr>
<tr>
<td>Brazil</td>
<td>Aratu</td>
</tr>
</tbody>
</table>

Including the major production sites, the Company has plants and holdings in the following geographic areas:

<table>
<thead>
<tr>
<th>Country</th>
<th>Manufacturing Locations</th>
</tr>
</thead>
<tbody>
<tr>
<td>United States</td>
<td>62 manufacturing locations in 23 states</td>
</tr>
<tr>
<td>Canada</td>
<td>5 manufacturing locations in 3 provinces</td>
</tr>
<tr>
<td>Europe</td>
<td>64 manufacturing locations in 17 countries</td>
</tr>
<tr>
<td>Latin America</td>
<td>29 manufacturing locations in 5 countries</td>
</tr>
<tr>
<td>Asia Pacific</td>
<td>48 manufacturing locations in 9 countries</td>
</tr>
<tr>
<td>India, Middle East and Africa</td>
<td>6 manufacturing locations in 4 countries</td>
</tr>
</tbody>
</table>

2.6 Nature of ownership and legal form

Dow is a publicly traded company. Total common stock outstanding as of January 31, 2010, was 1,150,293,750 shares.

2.7 Markets served

Chemistry is fundamental to our lives, enabling over 96 percent of all manufactured products. Dow products play a vital role in markets as diverse as: food, building and construction, transportation, furniture and furnishings, paper, home care, personal and household care, health and medicine, water purification, and electronics and entertainment.
2.8 Scale of reporting organization (year-end 2009 data)

Number of employees – 52,195 (Based on Full Time Equivalent persons, as reported in the Dow 2009 10-K)

Net Sales – $44,875 million

**Total Capitalization**

- Total Assets: $65,937 million
- Total Debt: $22,373 million
- Stockholders’ Equity: $20,555 million

Beneficial ownership information is found in the Dow 2010 Proxy statement. See Beneficial Ownership of Company Stock in the table of contents.

Quantity of production or quantity tied to sales is not reported. This value would need to convert volumes of liquids, volumes of foams, mass of other products and other units of measure into some term in order to represent a total quantity. Changing the mix of items sold over time makes the value of such a number meaningless.

2.9 Significant changes during the reporting period

Dow’s reported sales declined 22 percent from 2008 to $44.9 billion, as difficult economic conditions persisted for much of the year. Sales were down 30 percent on a pro forma basis, driven by declines of 17 percent in price and 13 percent in volume. While feedstock and energy costs remained volatile in 2009, they were markedly lower than the previous year as a result of weak demand across many end-markets. The Company’s purchased feedstock and energy costs fell $10.2 billion (40 percent) compared with 2008, although a rising cost trend began to emerge in the latter half of the fourth quarter.

Dow remained focused on its strategy to transform into an earnings growth company, most notably completing the acquisition of Rohm and Haas Company (Rohm and Haas) on April 1, 2009, combining the two organizations’ best-in-class technologies, broad geographic reach and strong market channels. Many efforts were involved to pay down the associated bridge loan ahead of schedule:

- implemented cost reductions and synergy capture faster than anticipated
- divested four non-core businesses
- raised new equity in an over-subscribed offering
- improved capital structure

We also made a number of difficult, but necessary, decisions: we reduced headcount, cut our capital budget, and for the first time in our history, the Board of Directors made the tough decision to lower the dividend.

---

2009 Pro Forma Sales and Employees by Geographic Area (dollars in billions)

<table>
<thead>
<tr>
<th>Geographic Area</th>
<th>Sales (billions)</th>
<th>Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>North America</td>
<td>16.8</td>
<td>25,505</td>
</tr>
<tr>
<td>Europe, Middle East, Africa</td>
<td>16.4</td>
<td>15,006</td>
</tr>
<tr>
<td>Latin America</td>
<td>5.2</td>
<td>4,244</td>
</tr>
<tr>
<td>Asia Pacific</td>
<td>8.2</td>
<td>7,440</td>
</tr>
</tbody>
</table>
See additional information about changes occurring in 2009 in the Dow 2009 10-K in Part II, Item 7.

2.10 Awards during 2009

The following awards are a sampling of the recognition earned by Dow in 2009. Visit the News Center – Awards and Accolades pages on dow.com for more information.

November 17, 2009
Dow Receives Perfect Score for Corporate Governance

November 16, 2009
DOW™ POWERHOUSE™ Solar Shingle Named a Best Invention of 2009 by TIME Magazine

November 5, 2009
Dow and BASF win IChemE Award for jointly developed HPPO Technology

September 11, 2009
Dow Brazil Recognizes Suppliers of Logistic Services for Reduction in Incidents and Best Practices in the Distribution Area

September 9, 2009
Dow Earns National Award for Community Education and Emergency Response Training on Chemical Safety

September 3, 2009
Dow Named to Dow Jones Sustainability Index for Ninth Time

August 13, 2009
Houston Dow Center Achieves LEED Gold Level Certification

July 23, 2009
Dow scientists win American Chemical Society (ACS) 2009 Heroes of Chemistry Award

July 16, 2009
Dow Earns “A+” for Sustainability Report

June 17, 2009
Dow Recognized as a Top 10 Sustainability Company in China

March 19, 2009
Dow Named a Top Company for Female Executives by NAFE

February 26, 2009
Dow Recognized as a Leader in Sustainability Reporting

3. Report Parameters

3.1 Reporting Period

Based on 2009 corporate data for the period ending 12/31/2009.

3.2 Date of most recent previous report

This is the seventh GRI Sustainability Report. The previous report covered the 2008 time period and can be found at our Sustainability Reporting site.

3.3 Reporting cycle

Annual

3.4 Contact point for questions regarding the report or its content

Peter N. Deal
Sustainability Program Management Office
1-989-636-3865

Mark C. Weick
Director, Sustainability Program Management Office
1-989-636-6501

Report Scope and Boundary

3.5 Process for defining report content

The process for creating the 2009 GRI Report began with a Reporting Steering Team examining improvement opportunities. The Steering Team placed priority on making the GRI Report more effective for a broad audience as well as helping readers learn about the report and the Company with less effort. The two-page summary section is a direct outcome. A stakeholder survey helped us improve the availability of the report to the target audience. Improvement opportunities in the prior year Assurance Report were also used to shape content, one example being expanded Disclosure on Management Approach sections.

To help make the report more understandable and useful, the report frequently points to other sources specifically designed to address relevant topics. An example is to encourage readers to stay up to date on sustainability progress reported quarterly on dow.com under Sustainability Reporting.
Report content is also guided by the Public Policy Priorities Work Process, which we described in on page 32 of our prior GRI Report. The connection between the seven 2015 Sustainability Goals and the Public Policy Priorities is illustrated below:

<table>
<thead>
<tr>
<th>2015 Sustainability Goals</th>
<th>Public Policy Priority Associated with Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Protection of Human Health and the Environment</td>
<td>Security and Public Safety</td>
</tr>
<tr>
<td>Community Success</td>
<td>Security and Public Safety</td>
</tr>
<tr>
<td>Product Safety Leadership</td>
<td>Chemicals and Health</td>
</tr>
<tr>
<td>Sustainable Chemistry</td>
<td>Alternative Feedstocks</td>
</tr>
<tr>
<td>Breakthroughs to World Challenges</td>
<td>Water</td>
</tr>
<tr>
<td>Energy Efficiency and Conservation</td>
<td>Climate Change and Energy</td>
</tr>
<tr>
<td>Addressing Climate Change</td>
<td>Climate Change and Energy</td>
</tr>
</tbody>
</table>

The GRI principles for defining content (materiality, inclusiveness, sustainability context, completeness), and those defining quality have been considered while producing this report. See more on GRI guidance on defining content.

Primary audience for the GRI Report:

- Academia
- People in the communities where Dow has facilities
- Customers
- Investors and analysts
- Media
- Professional organizations (e.g. NGOs, IGOs, Socially Responsible Investing organizations)
- Employees and prospective employees

The materiality* assessment for sustainability reporting can be summarized by this illustration and the table that follows:

### Defining Materiality* for Sustainability Reporting

#### Importance to Stakeholders

#### Significance of Impacts

*Materiality as defined in GRI Reporting Guidelines and used for this report: The information in a report should cover topics and indicators that reflect the organization’s significant economic, environmental and social impacts; or that would substantively influence the assessments and decisions of stakeholders.

3.6 Boundary of the report

This report covers majority owned Dow operations, and activities in leased facilities that are Dow managed, worldwide as of December 31, 2009. On April 1, 2009, the merger of Rohm and Haas with a subsidiary of the Company was completed, and Rohm and Haas became a wholly owned subsidiary of Dow.

Dow has utilized the GRI 2005 Boundary Protocol to determine which joint ventures (JVs) will be included in Sustainability reporting and in its 2015 Sustainability Goals. Where Dow owns more than 50 percent equity in a joint venture, its activity is included in the data reported for Dow as a consolidated entity. These joint ventures are represented in the lower right-hand part of the diagram presented on the next page.

Nonconsolidated joint ventures are not included in Company data herein. This is consistent with the financial reporting treatment of nonconsolidated affiliates (20-50 percent owned companies, joint ventures, and partnerships) on an equity basis. These joint ventures are represented in the upper left-hand part of the diagram, reflecting their significance and the fact that management control resides within the joint venture.
Click here for more information on the GRI Boundary technical protocol.

The Company’s principal nonconsolidated JVs, which accounted for more than 90 percent of Dow’s total equity earnings and cash distributions from JVs in 2009, are listed below:

**Principal non-consolidated joint ventures**

Dow owns 50 percent or less of these joint ventures.

- Americas Styrenics LLC [www.am styrenics.com](http://www.am styrenics.com)
- Dow Corning Corporation [www.dowcorning.com](http://www.dowcorning.com)
- Equipolymers [www.equipolymers.com](http://www.equipolymers.com)
- The Kuwait Olefins Company K.S.C.
- MEGlobal [www.meglobal.biz](http://www.meglobal.biz)
- The SCG-Dow Group
- Univation Technologies, LLC [www.univation.com](http://www.univation.com)

At the end of 2009, the Company had a majority ownership in 15 consolidated JVs.

The use of JV arrangements remains a centerpiece of Dow’s strategy to transform its portfolio of businesses into an earnings growth company. Dow Kokam LLC, formed during 2009, is an example of creatively finding a commercial path to market using the resources and intellectual property of complementary partners. Dow Kokam LLC is positioned to become the partner of choice for automakers that will power future vehicles with lithium rechargeable battery technology.

Partner selection is critical and Dow will work only with companies that have compatible business strategies, are financially strong, and share the same perspective on business ethics, and EH&S principles. Stakeholders may be assured that joint ventures are:

- created for strategic reasons
- designed to accomplish a long-term relationship with the partner
- given appropriate management attention related to values, culture and operating standards

Joint ventures are not used to exclude issues or products from the Dow portfolio.

The Company has carefully institutionalized the process for joint venture partner selection, venture creation, and management. A **JV White Paper** explains the Dow approach to use of joint ventures, with a specific focus on the Company’s principal non-consolidated affiliates. Additional details can be found in Note H to the Consolidated Financial Statements in the Company’s Annual Report on Form 10-K for the year ended December 31, 2009.

In addition to nonconsolidated JVs, information related to operations of suppliers is not included in this report.

### 3.7 Limitations on the scope or boundary of the report

This report, including links for Dow reporting found on page 2, addresses the full range of material economic, environmental, and social impacts of the organization, within the context of the boundary of the report as described in section 3.6.

### 3.8 Basis for reporting that can significantly affect comparability from period to period or between organizations

The basis for reporting on subsidiaries, joint ventures, leased facilities, and other entities does not significantly affect comparability from period to period. Beginning with 2009 reporting for Dow reflects the April 1, 2009, acquisition of Rohm and Haas.
3.9 Data measurement techniques and the bases of calculations

Operating Discipline Management System (ODMS) is used throughout Dow and helps accomplish meaningful data capture and aggregation. A key element of ODMS is a measurement policy and requirements. As part of these requirements, measurements are established and performance is monitored to ensure consistent performance that meets our objectives and targets. The ODMS requirements set expectations on calibration, measures, measuring equipment, measurement systems and critical instruments. Several data management systems address specific requirements and are unique to the particular needs of the respective measures. Examples include the Global Emissions Inventory (GEI) system that tracks emissions, the Global Incident Reporting Database (GIRD) that records occupational health and safety events, and the Global Asset Utilization Reporting (GAUR) system that collects utilization and energy use information. Each of these examples is global in scope, and defines data collection and the bases of calculations for the respective system.

3.10 Explanation of any re-statements of information provided in earlier reports

None identified.

3.11 Significant changes from previous reporting

This report represents the first year of operations reflecting the April 1, 2009, acquisition of Rohm and Haas.

3.12 Table identifying the location of the Standard Disclosures in the report

GRI index at end of report.

Assurance

3.13 Policy and practice with regard to external assurance for the report

Dow has engaged Environmental Resources Management (ERM) to review our GRI Report covering 2009. ERM is one of the world’s leading providers of environmental consulting services and health and safety. They have significant experience in the assurance process. This is the third time Dow has included assurance as a part of the GRI Report.
Independent Assurance Statement by ERM

The Dow Chemical Company – 2009 Global Reporting Initiative Report

The Dow Chemical Company (Dow) retained Environmental Resources Management (ERM) to provide an independent review and assurance statement for the 2009 Global Reporting Initiative (GRI) Report.

Scope of Work
ERM assessed the GRI Report from the following perspectives:

- Does the report reflect the sustainability issues and challenges facing Dow?
- Does it meet the requirements of AA1000 Accountability Assurance Standard (2008) for inclusivity, materiality, and responsiveness?
- Do the processes for compiling data from facilities provide accurate data for presentation in the report?

In addition, ERM reviewed the GRI Report against the GRI Sustainability Reporting Guidelines (2006) – Application Level A criteria.

Responsibility and Methodology
ERM's responsibility is to express our assurance conclusions within the agreed scope. We delivered our work in accordance with ERM’s assurance methodology, which is based on AA1000AS and the International Standard on Assurance Engagements (ISAE) 3000. We planned and performed our work to obtain all the information and explanations that we believe were necessary to provide a basis for our assurance conclusions as to whether the information set out in our scope of work was appropriately reported (moderate assurance). We used Dow's performance indicators definitions as criteria for undertaking our assurance work.

The accuracy and completeness of this information is subject to inherent limitations given their nature and methods for determining, calculating, and estimating such data.

The review was conducted during April and May 2010 and included an assessment of Dow’s data collection and verification processes and the GRI Report contents as well as the development of this formal assurance statement.

As part of the review, ERM conducted interviews with personnel at Dow’s headquarters in Midland, Michigan. ERM visited manufacturing facilities at Marlborough, Massachusetts; Tarragona, Spain; and Stade, Germany. These facilities were selected to represent a range of operations and material sustainability impacts and included two facilities located in non-English speaking countries.

During the interviews and facility visits, ERM focused on:

- Understanding the Dow business context and its sustainability strategy;
- Reviewing the GRI Report and other relevant supporting documents;
- Understanding the logistics of Dow’s data collection and reporting processes and systems, including the Global Incident Reporting Database, Global Emissions Inventory and Global Asset Utilization Report;
- Checking the accuracy of a sample of data from the facilities visited;
Reviewing the mechanisms for checking and verifying data at the facility, business unit, and corporate level; and

Reviewing the process for the management of change to data, including how errors are communicated to the data providers and corrective action checked to ensure accuracy in the reported data.

ERM Conclusions
Based on the review, ERM concludes that the GRI Report:

- Reflects the sustainability issues and challenges facing Dow;
- Meets the AA1000AS (2008) requirements for materiality, completeness, and responsiveness;
- Incorporates data compiled from robust processes; and
- Provides a reasonable and balanced presentation of Dow’s sustainability performance.

During the review period, ERM identified a number of issues that were discussed and subsequently addressed by Dow in the final draft of the GRI Report. These issues and the associated recommendations are included in detail in a separate assurance project report to Dow management.

ERM Competence
ERM operates strict conflict of interest checks and has confirmed our independence to work on this engagement to Dow. During 2009, ERM worked with Dow on unrelated consulting engagements. The members of the review team have not provided consulting services to Dow outside of the review. The review team has the required combination of education, experience, training, and skills for this engagement.

Environmental Resources Management
Annapolis, Maryland, USA
June 2010
4. Governance, Commitments, and Engagement

Governance

4.1 Governance structure of the organization

In November 2009, Dow received the highest rating possible for corporate governance by Governance Metrics International (GMI), an independent corporate governance research and ratings agency. GMI ratings provide an objective way of assessing corporate governance risk as well as governance leaders in their portfolios. This year 44 companies, including Dow, out of 4,207 global companies assessed, received a best-in-class rating.

We rely on our Board of Directors to know our Company and to conduct thorough reviews and ask difficult questions. Dow exemplifies good governance with a Presiding Director and a requirement that a substantial majority of the Board be independent directors.

Paul Polman, Chief Executive Officer Unilever PLC and Unilever N.V., was elected to the Board of Directors in February 2010 and serves on the Compensation and Leadership Development Committee and the Environment, Health and Safety Committee.

Corporate Officers are accountable to the Board, in addition to their management roles within the Company.

Detailed information about Dow’s governance structure can be found on our website, dow.com.

Board committees are described in the bylaws available on dow.com. A Board Committee Membership chart provides an overview of members and committee roles.

Audit Committee

Governance Committee

Compensation and Leadership Development Committee

Environment, Health and Safety Committee

The Sustainability Team serves as the governance body within the Company for EH&S, Public Issues and Sustainability. This team assists the EH&S Committee in their oversight responsibilities for Dow performance in these critical areas and is composed of the following members:

- David Kepler, executive vice president, Business Services, Chief Sustainability Officer and Chief Information Officer (chair)
- Mike Gambrell, executive vice president, Manufacturing & Engineering Operations
- Charles Kalil, executive vice president, Law and Government Affairs, General Counsel and Corporate Secretary
- Jim McIvanny, senior vice president, Performance Products
- Heinz Haller, executive vice president, Marketing/Sales, Performance Systems, Asia Pacific and Dow AgroSciences
- Neil Hawkins, vice president, EH&S and Sustainability – serves as the secretary of the team

4.2 Is the Chair of the Board of Directors also an executive officer?

Andrew Liveris is Chairman of the Board of Directors, President and Chief Executive Officer. Paul Stern, an external director, is serving as the Presiding Director. He is not an executive officer.

4.3 Number of members of the Board of Directors that are independent and/or non-executive members

The Board has assessed the independence of each non-employee Director based upon the Company’s Director independence standards described in the Company’s Corporate Governance Guidelines.

Based upon these standards, the Board has determined that the following 10 members of the Board are independent: Directors Barton, Bell, Fettig, Franklin, Hess, Polman, Reilley, Ringler, Shaw and Stern. These independent Directors constitute 83 percent of the full board, a substantial majority of the Board, consistent with Board policy.

4.4 Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body

Stockholders and other interested parties may communicate directly with the full Board, the Presiding Director, the non-management Directors as a group, or with specified individual Directors by any of several methods. These include mail addressed to The Dow...
The Dow proxy statement describes the requirements for submitting a proposal to be considered for inclusion in the Company’s proxy material for the future annual meeting. Agenda items 4 through 6 of the 2010 Proxy statement are examples of stockholder proposals.

During 2009, Andrew Liveris, Chairman and Chief Executive Officer, continued to host an employee blog called Access Andrew. Approximately two times per month the CEO kicked off a new topic to generate employee discussion. In one blog the CEO challenged employees with the question: “How would you develop a viable business in Africa?” In another he triggered a company-wide response to his belief that the company had a culture “based on strong values and friendships that transcend borders.”

The Dow EthicsLine is a safe, reliable and convenient avenue to report ethical concerns. It is available globally, with multi-lingual capabilities, 24 hours a day, seven days a week. In addition, Dow employees can also access the EthicsLine via an on-line reporting option. No call tracing or recording devices are ever used and the users of the EthicsLine have the option to remain anonymous as permitted by the governing jurisdiction.

Employees also provide input and direction through a Global Employee Opinion & Action Survey (GEOAS) that is conducted every two years.

4.5 Linkage between compensation for members of the highest governance body, senior managers, and executives, and the organization’s performance

The compensation programs at Dow are designed to support the realization of Dow’s vision to be the most profitable and respected science-driven chemical company in the world.

The following principles apply to the design and implementation of our executive compensation practices:

• **Drive Company results.** The program emphasizes variable, at-risk incentive award opportunities, which are payable only if specified goals are achieved and/or Dow’s stock price appreciates. The largest part of Named Executive Officers’ compensation is focused on long-term performance based on Dow’s return to stockholders. These at-risk incentives represent at least 80 percent of the Named Executive Officer’s direct compensation.

  • **Be cost effective and aligned with stockholder value creation.** Incentive awards are earned only if specified financial goals are achieved, and when Dow’s stock price appreciates. Higher compensation is paid when goals are exceeded and reduced compensation is paid when goals are not met.

  • **Emphasize stock ownership.** Long-term incentive (LTI) awards are delivered as equity based awards to senior executives. These executives are required to maintain a minimum level of stock ownership to encourage managing from an owner’s perspective and to better align their financial interests with those of Dow stockholders. Named Executive Officers are expected to own Dow securities with a value equal to between four and six times their annual base salary.

Please consult the compensation discussion and analysis section of the 2010 Proxy statement for more detailed information.

4.6 Processes in place for the highest governance body to ensure conflicts of interest are avoided

All directors, officers and employees of Dow are expected to be familiar with the Company’s Code of Business Conduct and to apply it in the daily performance of their Dow responsibilities. The Code of Business Conduct is intended to focus employees, officers and directors on areas of ethical risk, help them recognize and make informed decisions on ethical issues, help create a culture of the highest ethical and business standards, and provide mechanisms to report unethical conduct. The full text of Dow’s Code of Business Conduct is available at Dow.com, by clicking on “Ethics.”

The processes used to ensure that conflicts of interest are avoided include an annual Directors and Officers Questionnaire that requires disclosure of any transactions with the Company in which the director or executive officer, or any member of his or her immediate family, has a direct or indirect material interest. Separately, the Company assesses the business relationship between the Company and any other company where directors hold a position.

Lastly, the process for on-boarding new directors includes a defined orientation process that includes training for guiding their fulfillment of duties as a member of the Dow Board of Directors.
4.7 Process for determining the qualifications and expertise of the members of the Board of Directors

The Governance Committee has adopted guidelines to evaluate candidates for Board membership. The guidelines provide that candidates should possess individual skills, experience and demonstrated abilities that help meet the current needs of the Board, such as experience or expertise in some of the following areas: the chemical industry, global business, science and technology, finance and/or economics, competitive positioning, corporate governance, public affairs, and experience as chief executive officer, chief operating officer or chief financial officer of a major company.

Other factors that are considered include independence of thought, willingness to comply with Director stock ownership guidelines, and absence of conflicts of interest. These Director Qualifications are posted in Dow’s Corporate Governance Guidelines, available at www.DowGovernance.com.

4.8 Statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation

As the company integrated the acquired operations of Rohm and Haas in 2009 a restating of the Vision, Mission and Values of the Company was established. The mission now emphasizes sustainable solutions, and “Protecting our Planet” has been added as a third Company Value.

Vision: To be the most profitable and respected science-driven chemical company in the world.

Mission: To passionately innovate what is essential to human progress by providing sustainable solutions to our customers.

Values: Integrity – Respect for People – Protecting Our Planet

The Code of Business Conduct can be found on our website. Training for the Code of Business Conduct became mandatory for all Dow employees in 2003.

4.9 Procedures of the highest governance body for overseeing the organization’s identification and management of economic, environmental, and social performance, including risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles

The Environment, Health and Safety Committee of the Board assists the Board in fulfilling its oversight responsibilities related to social performance topics by assessing the effectiveness of environment, health and safety programs and initiatives that support the Company’s EH&S policy and by advising the Board on matters impacting corporate citizenship and Dow’s public reputation. Specific responsibilities of this committee include:

1. Reviewing the status of the Company’s EH&S policies and performance, including processes to ensure compliance with applicable laws and regulations.

Protecting Our Planet

In addition to our current values of Integrity and Respect for People, Dow added a third, critical value – Protecting Our Planet. Because we only have this planet with limited resources, everything we do and how we do it, has an impact. Every day, we focus our innovation engine on delivering new technologies that enable our customers to meet society’s greatest needs, while at the same time, reducing our own footprint.

From renewable energy to water purification and from crop productivity to harnessing the power of the sun – Dow is committed to protecting our planet.
2. Reviewing and providing input to the Company on the management of current and emerging environment, health and safety issues.

3. Reporting periodically to the Board of Directors on environment, health and safety matters affecting the Company.

4. Reviewing the status of the Company's philanthropy initiatives.

5. Reviewing the Company's diversity and inclusion philosophy, commitment and results.

6. Reviewing the Company's public policy and advocacy priorities.

7. Reviewing the Company's initiatives to build reputation.

8. Reviewing the Company's progress on sustainable development.

In a similar fashion, the Audit Committee of the Board ensures that financial reporting is in compliance with regulations and standards. The specific responsibilities of each of the Committees of the Board are found on dow.com at Corporate Governance – Board Committees.

The Executive Leadership Committee is continually informed about the financial performance of the company and is tasked in part with defining and implementing a strategy to maximize long-term shareholder value.

4.10 Process for evaluating the highest governance body's performance, particularly with respect to economic, environmental, and social performance

Each of the five Board level Committees conduct an annual review of charter and performance. In addition to this self-assessment, each committee makes regular reports to the Board of Directors. The Compensation Committee and the other non-employee Directors conduct an annual review of the performance of the Chief Executive Officer.

During 2009 the Executive Leadership Committee met with the external Sustainability External Advisory Committee (SEAC) to review and challenge how strategy and implementation are addressing the challenges of future generations.

Commitments to External Initiatives

4.11 Explanation of how the precautionary approach or principle is addressed by the organization

Dow supports the Precautionary Principle as defined in Principle 15 of the Rio Declaration. As a responsible corporate citizen, Dow continues to use a well-defined process for assessing and managing risks in the face of uncertainty. This process is science-based, ensuring decision-making includes an appropriate evaluation of risk and benefits.

One of our strengths is assessment and management of risks. Our approach has been implemented through our 25-year Product Stewardship philosophy, and further through our Responsible Care® commitment. This process applies to current products as well as those being contemplated for development.

Dow views the Precautionary Principle as an application of the principles of risk assessment and risk management. Risk assessment includes hazard identification, characterization, exposure assessment and risk assessment. Risk management encompasses the identification, selection and implementation of alternative actions for addressing risk through the control of identified hazard(s) and/or exposure.

For more information on Dow's 2105 Sustainability Goals, specific to Product Safety Leadership, visit our website.

4.12 Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses

CEO Water Mandate Report

Dow is a participant in the CEO Water Mandate, which seeks to make a positive impact with respect to the emerging global water crisis by mobilizing companies to advance water sustainability solutions in partnership with the United Nations, civil society organizations, governments, and other stakeholders. This voluntary initiative creates a platform to share best and emerging practices and to forge multi-stakeholder partnerships to address the problems of access to water and sanitation.

Dow has collaborated with other leaders at the World Economic Forum (WEF) 2008 Annual Meeting in Davos, Switzerland, to bring forth a call to action on “Managing
Our Future Water Needs." The WEF is an independent, international organization committed to improving the state of the world by engaging leaders in partnerships to shape global, regional and industry agendas.

Further information about Dow’s stewardship of water and efforts to address water-related challenges can be found in Water: A Growing Global Challenge and in the Appendix (CEO Water Mandate). The following Water Mandate areas are addressed:

- Direct Operations
- Supply Chain and Watershed Management
- Collective Action
- Public Policy
- Community Engagement
- Transparency

Advocacy in the Area of Addressing Climate Change
The United States Climate Action Partnership (USCAP), an alliance including Dow and leading climate and environmental groups, works to call on the federal government to enact legislation requiring significant reductions of greenhouse gas emissions. The USCAP developed a set of principles and recommendations to guide the formulation of a regulated economy-wide, market-driven approach to climate protection.

Dow continues to participate in the Carbon Disclosure Project (CDP). This index highlights global companies that have displayed the most professional approach to corporate governance in respect to climate change disclosure practices.

Dow is a member of Caring for Climate, a voluntary action platform for those UN Global Compact participants who seek to demonstrate climate change leadership. It represents a commitment to develop corporate strategies and practices to reduce carbon emissions, to publicly disclose emissions, and to urge governments to make progress. It also provides a framework for business leaders across the globe to advance practical solutions and help shape public policy as well as public attitudes.

Dow Commitment to Responsible Care® Management System
Dow has a long history of developing products, managing operations and using operating discipline to carefully address the risks associated with our product portfolio. Working with industry associations, chemical companies around the world now participate in Responsible Care®. This management system helps every participating chemical company continuously improve its health, safety and environmental performance.

Dow will make continuous progress toward the vision of no accidents, no injuries and no harm to the environment and will publicly report our global health, safety and environmental performance. As a participant of Responsible Care®, we will lead in ethical ways that increasingly benefit society, the economy and the environment while adhering to the 12 specific commitments that guide the discipline of our Responsible Care® Management System. A key part of the Responsible Care® management system process is mandatory certification by an independent, accredited auditor.

Biotechnology Principles Developed with External Stakeholders
The Dow Chemical Company has adopted the following principles to guide its decision-making in applying biological knowledge and techniques to develop products and services for the benefit of our customers, shareholders, and society. We will pursue biotechnology in alignment with Responsible Care® and Dow’s Values, Code of Business Conduct and Sustainable Development Principles.

We recognize that the unique scientific, philosophical and ethical implications of biotechnology must be considered.

- We will actively listen to and dialogue with stakeholders to understand their concerns and help us progress responsibly.
- We will inform the public about relevant benefits, risks, and potential implications of our biotechnology products and processes and encourage others to do the same.
- We will participate in outreach efforts and explore opportunities to make the benefits of biotechnology available to developing countries and will respect the rights of indigenous people to have access to local germplasm.
- We will promote research on the potential benefits and safety of our biotechnology products and services for humans, animals, and the ecosystem.
- We will support the development and implementation of internationally harmonized approaches to biotechnology safety analysis and promote the creation of a predictable and scientifically sound regulatory framework to reduce scientific uncertainty, manage potential risks, and assure public confidence.
• We will apply our established corporate Environment, Health & Safety Risk Review Process, which includes a thorough consideration of the impact on humans, animals, the environment and society, throughout the life cycle of all our biotechnology products and services and will take appropriate corrective actions.

• We will support the patentability of inventions as determined by the applicable laws of the countries in which we do business and will respect the intellectual property rights of others and not knowingly infringe upon valid patents.

• We will support the conservation of biological diversity and the sustainable use of biological resources.

• We will promote these principles throughout the industry and value chain.

The Dow Code of Business Conduct has a number of policies outlining our values and standards. We expect our suppliers and contractors to embrace similar values and standards. See the Dow Code of Business Conduct for more information.

External Certification Programs:
At the end of 2009, Dow had a global commitment to Responsible Care® in 22 countries. Dow’s overall global mechanism for standards development, application, and review is called the Operating Discipline Management System (ODMS). ODMS is utilized to conform to global Responsible Care® Management Standards globally, in addition to newly acquired operations around the world such as those in Russia, Asia and in the Middle East. Lloyd’s Register Quality Assurance Inc. (LRQA) has verified that ODMS is equivalent to ISO 14001, OHSAS 18001, and Responsible Care Management Standard.

Dow achieved the American Chemistry Council’s mandatory external RCMS®: 2005 certification by LRQA in 2007. The second certification cycle was initiated in November 2008, with the completion of the Midland headquarters audit. This cycle will be completed in 2010 after eight Dow sites are successfully audited to achieve the RCMS®: 2008 certification.

4.13 Memberships in associations and/or advocacy organizations
Examples of trade, business associations and alliances where Dow is an active member are shown below. Dow participates in numerous additional organizations, including many at the local and regional level.

• The Brazilian Chemical Industry Association (ABIQUIM)
• Alliance to Save Energy
• American Council for an Energy Efficient Economy
• Alliance with US OSHA to share health and safety expertise
• Alliance with China SEPA to share pollution prevention practices with SMEs
• Alliance with China SAWS to share worker safety practices with SMEs
• American Chemistry Council (ACC)
• China-US Center for Sustainable Development
• Chlorine Chemistry Division of the American Chemistry Council
• European Chemical Industry Council (CEFIC)
• Global Environmental Management Initiative (GEMI)
• International Council on Chemical Associations (ICCA)
• Participant in OSHA VPP program (eight sites verified as VPP sites and Corporate Pilot)
• Plastics Europe – formerly Association of Plastics Manufacturers of Europe (APME)
• Sustainable Packaging Coalition
• The Business Roundtable (BRT)
• United States Climate Action Partnership (USCAP)
• World Business Council for Sustainable Development (WBCSD)
  – China Business Council for Sustainable Development (CBCSD)
• World Chlorine Council (WCC)
• World Environment Center (WEC)
• World Resources Institute Green Power Market Development Group

Stakeholder Engagement

4.14 List of stakeholder groups engaged by the organization

<table>
<thead>
<tr>
<th>Advocacy Groups</th>
<th>IGOs and NGOs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communities</td>
<td>Retirees</td>
</tr>
<tr>
<td>Customers</td>
<td>Shareholders</td>
</tr>
<tr>
<td>Employees</td>
<td>Trade Associations</td>
</tr>
<tr>
<td>Investment Professionals</td>
<td></td>
</tr>
</tbody>
</table>

Stakeholder engagement also takes place with specially designed stakeholder advisory groups:

• The Sustainability External Advisory Committee (SEAC) has represented a wide variety of external stakeholders since its initial meeting in 1992. Leaders from international, non-governmental organizations, academics, government administrators, and others are selected to represent external points of view in ongoing semi-annual meetings. Members bring their knowledge, experience and understanding to discuss issues of concern to Dow.

• The Independent Advisory Panel on Security (IAP) is chaired by former Congressman and 9/11 Commission Vice-Chairman Lee Hamilton. The Panel enables the Company to understand the roles of industry, government and the public in a challenging security environment.

• An Independent Energy Advisory Panel (IEAP) provides insight to the company on strategic options, potential scenarios and other challenges and opportunities related to energy.

• An example of a specially designed stakeholder group of employees is the Business Sustainability Network, formed in 2009. This collection of marketing and business persons meets regularly to identify the trends and the actions needed by the Company to respond to growing customer sustainability requirements.

4.15 Basis for identification and selection of stakeholders with whom to engage

A team focused on IGO, NGO and trade association engagement annually reviews identification and catalyzes the corporate approach related to key issues. The potential impact of key stakeholders on company objectives helps determine with whom and about what to engage. Public policy priorities form part of the basis for this NGO engagement. See section 3.5 for the public policy priorities defined during 2009.

This process helps the company gain Non-Government Organizations (NGO) and Inter-Governmental Organization (IGO) perspective leading to more successful issues management and government affairs efforts, while addressing many key businesses challenges.

The selection of members for the SEAC focuses on the potential to challenge conventional thinking and press the case for adopting proactive and effective positions on important issues. Members of the IAP and the IEAP are selected based on their expertise and insights into the challenges addressed by the respective panels.

4.16 Approaches to stakeholder engagement

While the responsibility of stakeholder engagement is shared by several groups within the organization, the Public Affairs function and the Government Affairs & Public Policy (GA&PP) function interface the most with key internal and external stakeholders.

The Public Affairs function sets and implements strategies for communications focusing on people, financial, media relations, executive communications and brand identity. Geographic/Site Public Affairs supports Dow in Asia Pacific, Europe, Middle East and Africa, Latin America and North America by focusing on communications that build relationships and provide proactive advocacy on Dow’s behalf.

GA&PP helps generate effective external engagement to create opportunities to share resources, experiences, knowledge, and expertise. Through thoughtful engagement, benefits are gained for both the company and the stakeholder group and strategic objectives are able to be advanced. External public policy stakeholders are usually involved and help broaden Dow’s thinking about approaches to societal challenge.
GA&PP uses a defined process to design and facilitate stakeholder engagement. The process steps range from assessing the value of engagement to implementation planning and execution.

The following are examples of engagement with key stakeholders in 2009:

- Three customer forum events in Latin America brought 400 key customers together to learn about Dow efforts to accelerate the integration between Dow and Rohm and Haas.

- Roundtable in Brussels, Belgium. Dow hosted a discussion of 35 selected representatives of EU institutions, business and civil society to assess perspectives about long-term sustainability and short-term economic competitiveness. One particular subject examined was the EU sustainable consumption and production framework.

- UNEP Global Business Summit for the Environment (B4E), Suntec, Singapore. More than 600 participants discussed the issues and explored solutions for a more sustainable future. Dow organized a roundtable to seek input from NGOs about NGO-business partnerships to advance sustainability agendas.

- Swedish Presidency of the European Union, Linkoping, Sweden. Dow gave a keynote address that emphasized the importance of innovation in moving beyond the economic crisis. About 250 important stakeholders discussed overcoming challenges to developing an eco-efficient economy.

- International Conference on Chemicals Management, Geneva, Switzerland. After a year focused on the advancement of Chemicals Management initiatives, the conference included a session getting stakeholder feedback from UNEP, OECD, World Wildlife Fund, International POPs Elimination Network, and others.

**Employees**

The Global Employee Opinion and Action Survey (GEOAS) measures employee attitudes on the important topics of engagement, satisfaction and commitment and monitors perceptions about key strategic themes that are important to the company. Many GEOAS items are benchmarked against feedback from other large, well-respected companies that conduct similar employee surveys.

Seven employee networks – each with a senior executive sponsor – bring together people with a common interest to share experiences, find mentors, seek professional development, and gain access to senior leadership.
They consist of the following groups:

- African-American Network
- Asian Diversity Network
- DisAbility Employee Network
- Gays, Lesbians & Allies at Dow
- Hispanic-Latin Network
- Middle East Intercultural Network – added in 2009
- Women’s Innovation Network

Dow has a website, EVERGREEN, available in several languages, that brings a wide range of sustainability topics to employees. Some topics include employees’ green ideas, a personal carbon footprint calculator, and resources to teach kids about the environment.

**Retirees**
The Dow Chemical Company has more than 47,000 retirees across the United States. A Retiree Relationship Strategy works to harness the energy and commitment of retirees to advocate and spread goodwill for Dow and to reinforce the mutual respect between Dow and its retirees.

**Communities**
See the Society Disclosure on Management Approach and SO1 for a description of Community Advisory Panels and the 2015 Sustainability Goal Contributing to Community Success.

**Other Stakeholders**
Other stakeholders, including those identified in 4.14, are engaged through various means including the dow.com website, which provides access for contact with the company. Contact Help and Feedback.

### 4.17 Key topics and concerns raised through stakeholder engagement and how the organization has responded to those key topics and concerns

The SEAC provides an ongoing opportunity for open dialogue between Dow’s business leaders and independent external thought leaders. The SEAC exists to help Dow by providing new perspectives and challenging the Company’s positions, including the increasing importance of freshwater as a limited resource and the importance of preserving biodiversity. The SEAC also continues to provide counsel related to implementation of the 2015 Sustainability Goals.

The Contributing to Community Success Goal is designed to make quality of life improvements by 2015 in the communities near Dow strategic sites. To help focus our priorities in those communities, we first identify and define quality of life issues. Next, the perspectives are shared in a collaborative workshop chartered to build a Success Plan to address the specific issues.

Dow has a long history of engaging in dialogue with others who are similarly dedicated to constructive exchange of ideas while respecting diversity of opinion. This dialogue is based on the belief that collaboration with external stakeholders is an essential part of Dow’s efforts to build a sustainable future.

Dow also recognizes that its engagement needs to include an ongoing public debate around historical issues and challenges such as Agent Orange, asbestos, Bhopal and dioxin. Pending legal proceedings can pose limitations on such interaction. To learn more about Dow’s opinion on these issues and challenges, visit Issues and Challenges on the dow.com site.
The Economic Impact of Sustainability
Economic Summary

As the company pursues its corporate strategy, we will continue to use our problem-solving expertise to help address the world’s most difficult challenges. We are committed to fostering innovations that will help the human population tackle the needs of the worldwide economic system.

To accomplish this task, we are constantly seeking important opportunities with partners for change because we believe that challenging problems are better addressed when all competencies are brought to the table to form a complementary combination of skills that can deliver breakthrough solutions.

Balancing the Economic Equation
As always, we are guided by our 2015 Sustainability Goals as we work to balance sustainability with a growing global economic system. While the concept of economic sustainability is fueled by the need for economic growth in the marketplace, we realize that we must temper this drive by ensuring that the world’s most pressing social and environmental challenges are properly addressed.

Our Commitment to Use Science to Contribute to a Sustainable World
We contribute to the sustainability of society and our planet by developing innovative technologies for current and future markets.

Partners for Change
We are leaders in advancing all aspects of sustainability, openly collaborating with customers, suppliers, communities, civil society and governments.

Smart Solutions for Today
Our technologies enable our customers, and their customers, to develop more sustainable products and services.

Responsible Operations
Our infrastructure has a positive impact on our company, our communities and ourselves. Our operations are a model for others, wherever we operate.

Corporate Strategy
Preferentially invest in a portfolio of technology-integrated, market-driven performance businesses that create value for our shareholders and growth for our customers.

Manage a portfolio of asset-integrated building block businesses to generate value for our downstream portfolio.

Right. Now. These two words describe the spirit of urgency that guided our actions in 2009. We are investing in the right innovations and we have the right geographic balance to capture growth in emerging regions of the world. These elements for success allow us to implement changes from a position of strength and leadership. Simply put, we believe the Dow of tomorrow is here today. Review our 2009 Annual Report, “The Dow of Tomorrow Here Today” and go to page 4 to find out how Dow’s strategy will contribute to a more sustainable world.

Key Global Accomplishments for 2009
• Acquisition of the Rohm and Haas Company.
• Addition of performance products and specialty portfolio that will accelerate the awareness of sustainable chemistry.
• Combining best-in-class technologies, geographic reach and market channels to create a $14 billion diversified business portfolio defined as Dow’s Advanced Materials division.
• Significant organizational restructuring of Dow’s leadership team to address unique regional needs.
• Launching of the Shanghai Dow Center.

“Never in Dow’s history have our geographic position, operating segments and people been better aligned. All serve the same mission: to passionately innovate what is essential to human progress by providing sustainable solutions to our customers.”
Andrew Liveris, CEO, The Dow Chemical Company
Key Regional Accomplishments for 2009

Two new major businesses were formed with Michigan as their base of operations. These two projects are expected to create approximately 2,000 new jobs by 2014.

- DOW™ POWERHOUSE™ Solar Shingle, a revolutionary flexible photovoltaic solar cell packaged in the form of a roofing shingle, can be integrated with standard asphalt shingle materials.
  - Named as one of “The 50 Best Inventions of 2009” by TIME magazine.
- Dow Kokam – a joint venture to develop and manufacture advanced energy storage technologies for the transportation and other industries.
  - Drawing on the strengths of its parent companies, Dow Kokam offers a unique mix of patented technology, market knowledge, materials science capabilities and manufacturing expertise.
  - Dow Kokam is planning construction of an 800,000 square-foot facility to produce lithium-ion batteries for use in automobiles to help break our planet’s dependency on fossil fuels.

Indirect Economic Impacts

Dow places a great value on becoming an integral part of our communities. We strive to be a good neighbor as well as a global corporate citizen. And through our actions, we know that we are building better, stronger, more sustainable communities in the places where we do business. Our site and local charitable contributions are illustrated on page 22 of the Dow Annual Report.

What You’ll Find in This Section

A detailed overview of our financial responsibilities and obligations, including:

- Our overall economic value, generated and distributed. EC1
- The financial implications and risks of climate change for Dow. EC2
- How we fund our employee benefits. EC3
- What we receive from the federal government and why. EC4
- How we compensate our people. EC5
- How we hire our vendors and suppliers around the globe. EC6
- How we hire and train our leaders. EC7
- How we contribute to communities and community programs and their overall impact. EC8

For major organizational risks and opportunities, see section 1.2 in Profile and EC2 below. Please consult Dow financial reports and earnings information for externally reported financial information.

“Making Michigan a leader in manufacturing green energy products continues to be a key part of our economic plan to grow the economy and create jobs. Dow’s solar shingles are another example of local research and development helping grow our green economy, and I applaud Dow’s ongoing commitment to developing green energy solutions right here in Michigan.”

Jennifer M. Granholm,
Governor of the State of Michigan
The Economic Impact of Sustainability • 35

a material shortage of certificates for its European operation during this time frame. The final design features of phase 3 of the EU ETS are still being negotiated. This trading period runs from 2013 to 2020. Companies with production facilities that are energy intensive and trade-exposed will be able to obtain a portion of their CO$_2$ emission allowance requirements based on performance benchmarks. In addition, some compensation for CO$_2$ induced electricity cost increases will be granted under new state aid provisions. The final agreements on these measures will dictate the number of additional CO$_2$ certificates Dow is required to purchase annually. The market prices for these CO$_2$ certificates and the levels of compensation allowed for electricity prices will in turn affect operating costs and therefore global competitiveness versus companies in regions that do not currently apply such CO$_2$ burdens.

A global climate-change strategy is called for with sharp, firm and direct action to dramatically slow, stop and then reverse the growth of greenhouse gas levels in the atmosphere. Dow will advocate for and participate in the monetization of carbon in fair marketplaces, a critical objective in establishing country market mechanisms for cost-effective carbon management. Each country should be allowed to establish its own systems with targets set fairly for each industry sector with appropriate linkages to a globally negotiated system.

Dow will invest a significant portion of its research and development to support and develop alternative energy solutions for the world, especially solar photovoltaics. See EN6 for more information.

Senior management of the company continues to evaluate the financial implications of climate change for the organization. No quantification of the financial implications is available as of the year ending 2009.

EC3 Coverage of the organization’s defined benefit plan obligations

Dow’s total rewards strategy is to provide employees with compensation and benefits that are competitive with other top global companies within the relevant labor market. Dow offers defined benefit pension plans in several countries where defined benefit plans are common. The largest of these defined benefit plans are in the United States, Canada, The Netherlands, Switzerland and Germany.

It is Dow’s policy to contribute to defined benefit plans where pension laws and economics either require, or encourage funding. As such, most of our pension plans are funded through separate trusts, with
The notable exception of Germany where defined benefit plans are commonly book reserved. Dow also has unfunded plans for compensation above qualified or registered plan limits in the United States and Canada. All funded plans are in compliance with all local funding laws. The aggregate projected benefit obligation ("PBO") under U.S. GAAP as of December 31, 2009, for all of Dow's major defined benefit plans was $19.9 billion with an aggregate market value of assets of $14.6 billion. Contributions to Dow's defined benefit plans are determined by funding regulations, negotiation with Trustees (where applicable) and economics. The corporate Benefit Governance and Finance Committee must approve any funding in excess of legal minimums.

Dow also offers defined contribution plans in many countries. Typically Dow encourages employee contributions to plans by offering matching contributions. The plan formulas in each country are designed to be competitive within that country. Since pension plans and other retirement benefits build upon social security, and social security benefits vary widely by country, Dow's plan varies considerably country to country.

**EC4 Significant financial assistance received from government**

Recently, Dow Solar Solutions (DSS) announced that Midland, Michigan, had been identified as the preferred site for the first full-scale production facility for its revolutionary DOW™ POWERHOUSE™ Solar Shingle, subject to finalizing local, state and federal funding. For the latest information about government assistance in this area please visit Dow Solar Solutions. Dow Building Solutions was originally selected as a recipient of a $20 million, 50 percent cost share Solar America Initiative Pathways award from the U.S. Department of Energy in 2007.

Dow and Townsend Kokam LLC recently announced their proposed joint venture, Dow Kokam. The venture has been awarded a $161 million federal grant from the U.S. Department of Energy to develop a new generation of high-power battery technology to supply the automotive industry. Dow Kokam received approval for future tax credits from the Michigan Economic Growth Authority to produce lithium-ion battery packs for hybrid and electric vehicles at its battery manufacturing facility in Midland, Michigan, signaling another important milestone in the advancement of Dow Kokam as the leading full-package battery system producer and the growing importance of Midland and the state of Michigan to the advanced battery industry. The tax credits, equivalent to $42 million, enable Dow Kokam to incorporate battery pack assembly equipment and production capability into Phase II of its production plan which could be initiated as early as 2011.

**EC5 Range of ratios of standard entry level wage at significant locations of operation**

Dow does not use regional minimum wage rules to define compensation strategy for employees, but does comply with any applicable minimum wage requirements.

Dow offers competitive employee base pay, which is determined through a salary survey process. This process benchmarks compensation at competitive companies for talent and helps Dow maintain employee pay that is tailored to geographically competitive standards.

In addition to employee base pay, where applicable, employees participate in Dow's annual variable pay program, which is dependent on individual and Company results. We also offer other programs that keep us competitive in the market and make us an Employer of Choice.
EC6 Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation

The Dow Chemical Company will conduct business with suppliers who are globally competitive and who will provide the lowest long-term costs. Dow is dedicated to working closely with local suppliers to educate them about our strategic purchasing requirements. Dow will help local suppliers understand the need and potential actions for their business to be globally competitive. The use of local suppliers or local content is considered in all purchasing decisions.

Local purchasing occurred at the levels shown for several of the company’s significant locations of operation. For U.S. locations, local is defined as from suppliers within the state, and for other locations, local is defined as from within the country.

<table>
<thead>
<tr>
<th>Major site</th>
<th>State</th>
<th>Country</th>
<th>Percent of purchases that are local</th>
</tr>
</thead>
<tbody>
<tr>
<td>Midland</td>
<td>Michigan</td>
<td>United States</td>
<td>16%</td>
</tr>
<tr>
<td>Plaquemine</td>
<td>Louisiana</td>
<td>United States</td>
<td>17%</td>
</tr>
<tr>
<td>Pittsburg</td>
<td>California</td>
<td>United States</td>
<td>20%</td>
</tr>
<tr>
<td>St. Charles</td>
<td>Louisiana</td>
<td>United States</td>
<td>25%</td>
</tr>
<tr>
<td>Terneuzen</td>
<td>Netherlands</td>
<td></td>
<td>31%</td>
</tr>
<tr>
<td>Stade</td>
<td>Germany</td>
<td></td>
<td>38%</td>
</tr>
<tr>
<td>Freeport</td>
<td>Texas</td>
<td>United States</td>
<td>42%</td>
</tr>
<tr>
<td>Rhine Center</td>
<td>Germany</td>
<td></td>
<td>61%</td>
</tr>
<tr>
<td>Zhangjiagang</td>
<td>China</td>
<td></td>
<td>86%</td>
</tr>
<tr>
<td>Aratu</td>
<td>Brazil</td>
<td></td>
<td>98%</td>
</tr>
</tbody>
</table>

EC7 Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation

We believe that our workforce should reflect the places where we do business today and tomorrow. In 2009, we hired approximately 1000 people around the world. Ninety-two percent were local (from the country in which they were hired). Two areas with a significant growth emphasis are China and India where 98 percent of our hires were from within the respective home country. All senior management hiring in 2009 was in-country.

EC8 Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement

In 2009, Dow contributed $26.8 million to support a wide range of programs that contribute to community success, support sustainability, foster science in society and stimulate innovation. Pages 24-25 of the Dow Annual Report provide more information.

In-kind contributions were valued at an additional $3,810,804 product and $1,327,272 equipment.

Dow supports the United Nations Millennium Development Goal to cut in half the number of people without access to safe drinking water by 2015. In support of this goal, Dow is collaborating with an extensive network of NGOs, corporations and government agencies that are attempting to address the global water issue.

An interactive map allows one to view over 60 company activities in the area of eco and water initiatives provided primarily for public benefit.

Habitat for Humanity

The ongoing support Dow has provided to Habitat for Humanity demonstrates the Dow commitment to the Human Element. Dow was the first corporate sponsor of Habitat for Humanity – almost 27 years ago. Over that period we have donated more than $32 million in cash and gift-in-kind products and participated in 18 straight Jimmy and Rosalynn Carter Work Projects. Through this partnership, Dow has helped meet the basic human need for decent, affordable houses for families in need in more than 20 countries. We have also participated in all of Habitat’s disaster response programs including the tsunami relief and Hurricane Katrina relief.

Chemical Transportation Safety and Security

Dow continues to advance rail safety and security. More than 22 years ago, Dow and Union Pacific co-founded TRANSCAER (Transportation Community Awareness and Emergency Response), the voluntary national outreach group for local emergency responders and community leaders to experience hands-on demonstrations and educational workshops. More information about the UP/Dow TRANSCAER Training Tour, including schedule and training details, can be found at TRANSCAER Training Tours. A progress report of how the two companies are on track to increase rail safety and security is available on dow.com.
2015 Sustainability Goal – Contributing to Community Success

By 2015, 100 percent of Dow sites where we have a major presence will have achieved their individual community acceptance ratings, which measure the community’s favorability with how Dow plays a positive role in making the community a better place to live.

EC9 Understanding and describing significant indirect economic impacts, including the extent of impacts

Dow does not attempt to aggregate a measure of the indirect economic impacts that result from its 150 locations throughout the world. The 2015 Sustainability Goal, Contributing to Community Success, is specifically designed to improve the quality of life in the communities where we have a significant portion of our people and/or Dow assets. Progress on specific improvement plans in these communities is being evaluated and our next report will provide an update about contributions to stronger, safer and more sustainable communities.

Examples of Community Success efforts now underway include:

• In mid-Michigan, Dow initially developed and then partnered with Delta College to deliver and refine the “Fast Start” curriculum. “Fast Start” allows individuals, who may already have a technical associate degree or military experience in a related field, to complete the Chemical Processing portion of an associate degree (25 credits) in 16 weeks and hit the ground running in jobs and careers as operators and technicians in the chemical manufacturing industry.

• Dow’s Pittsburg Operations provided funding and curriculum development to create an Electrical & Instrumentation Technology (ETEC) certificated program at Los Medanos College. Building on the success of the Process Technology (PTEC) program Dow helped develop in 2005, this new program will fill a need of skilled workers in the community and enable local residents to earn a good living without having to leave the area. Surveys conducted indicated the region will need to recruit or hire 150 electrical technicians each year for the next 10 years. No other college in the area provides the education or training needed to obtain these high-skilled, high-wage and high-demand jobs. Working closely with the college and other industry partners, Dow continues to play a critical role in developing this program to ultimately provide lucrative careers while ensuring the workforce we (and other local manufacturers) hire become valued employees.
Taking Responsibility for Our Impact on the Environment
Protecting people and the environment is part of everything we do and every decision we make. During 2009, our leadership affirmed the four core strategic themes, one of which is to Set the Standard for Sustainability. That commitment was further elevated by adding a third element to our statement of company values. In addition to Integrity and Respect for People, we have now declared that everyone at Dow will hold Protecting Our Planet as a core value.

Each employee has a responsibility to ensure that our products and operations meet applicable government and/or Dow standards – whichever is more stringent. Our goal is to eliminate all injuries, prevent adverse environmental and health impacts, reduce waste and emissions, and promote resource conservation at every stage of the life cycle of our products. Employees are involved in job-specific training and awareness programs that range from manufacturing specific safety processes and emergency response procedures to Waste Reduction Always Pays (WRAP) and the Drive to Zero safety performance program. See profile 4.12 to learn about our efforts with TRANSCAER, which trains beyond our employee base.

Dow has been advocating for policy that will support the slowing, stopping and reversing of the growth of greenhouse gas (GHG) emissions in our economy by reinventing the way we apply chemistry. As a world leader in chemistry, we are uniquely positioned to deliver innovative energy alternatives, less carbon intensive raw material sources, and other solutions not yet imagined.

The company uses a multi-layered review process for data entered into the emissions tracking system by facility, site and business. This included 2009 training that involved more than 150 people to ensure accuracy of our emissions reporting. A management of change process is used to document data corrections. The final process concludes with an annual communication from the Environmental Technology Center to management on the data quality and monitoring process.

Setting and Reaching Goals for Injury and Illness

From 1994 to 2005, we used a set of 10-year goals to drive our performance in the activities of EH&S performance. In 2006, we set new 10-year goals to challenge ourselves to become more external and intentional about doing good for the planet. At the same time we are minimizing our footprint and are being wise stewards of resources. This report provides an overview of progress and challenges remaining.

In the Local Protection of Human Health and the Environment goal we are tracking 10 metrics to drive performance improvement. Please go to our ongoing quarterly 2015 Goal Update report to see the most recent status.

We drove improvements in our injury and illness rate by 90 percent in the first 10-year goal period. At the end of 2009, injury and illness performance is again running better than our improvement target. Where we declared an intention to reduce Injury and Illness rates by 36 percent, we have decreased that by 44 percent.

For the Loss of Primary Containment (LOPC) metric with a target reduction of 57 percent, we have delivered a 61 percent performance improvement.
In 2009, the Injury and Illness rate for Dow employees and contractors was 0.29 per 200,000 hours worked. This makes our population approximately 19 times less likely to be injured or become ill at work than the average U.S. manufacturing employee. The high reduction in injury and illness rate that began during the first 10-year goal period continued into the current 10-year goal period helping exceed our overall target reduction by 8 percent at the 2015 goal’s halfway point.

In 2009, the Company experienced 520 Loss of Primary Containment (LOPC) events, which are incidents of unplanned leaks, breaks and spills. Every event avoided reduces waste, improves worker safety, and keeps employees focused on productive tasks. By 2015 we are targeting a further reduction in LOPCs to no more than 130 events. The high reduction in LOPC that began during the first 10-year goal period continued into the current 10-year goal period helping exceed our overall target reduction by four percent at the 2015 goal’s halfway point.
Setting and Reaching Goals for Local Protection of Human Health and Environment (LPHHE)

Other LPHHE goal results are compared to mid goal targets:

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<thead>
<tr>
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<tbody>
<tr>
<td>Injury and Illness Severity rate</td>
<td>-35%</td>
<td>-50%</td>
<td>Exceeded</td>
</tr>
<tr>
<td>Process Safety Incidents</td>
<td>-35%</td>
<td>-51%</td>
<td>Exceeded</td>
</tr>
<tr>
<td>Severe MVA (from 2007)</td>
<td>-14%</td>
<td>-38%</td>
<td>Exceeded</td>
</tr>
<tr>
<td>VOC Emissions</td>
<td>-21%</td>
<td>-27%</td>
<td>Exceeded</td>
</tr>
<tr>
<td>NOx Emissions</td>
<td>-12%</td>
<td>-28%</td>
<td>Exceeded</td>
</tr>
<tr>
<td>Priority Compound Emissions</td>
<td>-12%</td>
<td>-35%</td>
<td>Exceeded</td>
</tr>
<tr>
<td>Hazmat Transportation LOPC Count</td>
<td>-46%</td>
<td>-45%</td>
<td>Met</td>
</tr>
<tr>
<td>Highly Hazardous Material Tonne-Miles</td>
<td>-19%</td>
<td>-47%</td>
<td>Exceeded</td>
</tr>
</tbody>
</table>

We will continue to report our progress in our 2015 Goals Quarterly Progress Report.

An additional 2015 Sustainability Goal is to reduce our greenhouse gas (GHG) intensity by 2.5 percent per year. We have experienced two years of lower demand resulting in less efficient operations and an increase in GHG intensity. The recent 2009 intensity result is one percent above the level of 2005. While the return-to-normal operations will in part get us back on track to reduce our GHG footprint per pound of product, we are also working to find other ways to reduce GHG emissions and GHG intensity. Kyoto GHG intensity is the sum of CO₂-equivalent direct and indirect emissions of the Kyoto family of greenhouse gases divided by unit of production.

By 2025, we aspire to reduce absolute emissions within the Company. The chart below demonstrates that we have begun to do just that – absolute emissions have been reduced in 2007, 2008 and 2009. Dow’s absolute GHG emissions in 2009 is 41.3 million metric tons. This is 5 percent less than the GHG emissions in 2008. The greenhouse gas information includes the emissions of the operations acquired from Rohm and Haas in 2009. The other direct emissions are primarily related to foaming agents used in the manufacture of insulating materials.

We have been able to reduce energy intensity from 5,666 in 2005 to 5,584 Btu per pound of production in 2009. This one percent improvement leaves us 12 percentage points short of our 2009 target of 5,000 Btu per pound of production. Similar to our GHG intensity metric, this ratio will improve when
facilities are running at normal rates. We are continuing to search for ways to conserve energy and be more efficient in future operations.

Reports on other 2015 Sustainability Goals can be found within the GRI Report at these locations:

Community Success: Society
Product Safety Leadership: Product Stewardship
Breakthroughs to World Challenges: Product Stewardship
Sustainable Chemistry: Product Stewardship

The most senior position with responsibility for environmental aspects is the Chief Sustainability Officer, which is held by David E. Kepler II.

Additional contextual information is available:

- Environmental matters are reviewed as required by the U. S. Securities and Exchange Commission in the Form 10-K report.
- The environmental policy for the Company can be found on dow.com.

What You’ll Find in This Section
A detailed overview of our environmental responsibilities and obligations, including:

- The raw materials we process and purchase globally. EN1
- The percentage of materials we recycle. EN2
- The amount of direct and indirect energy we consumed and saved to produce products. EN3, EN4 and EN5
- The variety of Dow energy-efficient or renewable-based products and services. EN6
- The ways we are reducing our carbon footprint. EN7
- How much we’ve reduced the amount of water we use annually. EN8
- What we are doing to reduce our water usage in water-stressed regions and the amount of water we recycle and reuse. EN9 and EN10
- Where we have operations near areas of high biodiversity; our impact in these areas; the habitats protected or restored; how we’re investing in conservation at these sites; and the species affected by our operations in these areas. EN11 – EN15
- The amount of greenhouse gas emissions controlled by Dow, as well as the initiatives to reduce these gases. EN16, EN17 and EN18
- The amount of ozone-depleting substances and other air emissions we’ve reduced. EN19 and EN20
- The amount of wastewater we send to water treatment facilities. EN21
- What wastes we dispose of, how we treat them and what kind we’ve spilled. EN22 and EN23
- The kind of waste we’ve transported, imported, exported or treated. EN24
- The bodies of water we currently protect. EN25
- Why we are responsible for health and the environment, both present and future. EN26
- Where our products are in our customers’ value chain. EN27
- What fines we’ve paid for our environmental non-compliance. EN28
- The environmental impact of the products we transport. EN29
- Dow’s overall investments and expenditures on environmental protection. EN30
Environmental Performance Indicators

Aspect: Materials

EN1 Materials used by weight

The Company operates in an integrated manufacturing environment. Basic raw materials are processed through many stages to produce a number of products that are sold as finished goods at various points in those processes.

The two major raw material streams that feed the integrated production of the Company’s finished goods are chlorine-based and hydrocarbon-based raw materials.

Salt, limestone and natural brine are the base raw materials used in the production of chlor-alkali products and derivatives. The Company owns salt deposits in Louisiana and Texas; Alberta, Canada; Brazil; and Germany. The Company also owns limestone deposits in Texas.

The Company purchases hydrocarbon raw materials including liquefied petroleum gases, crude oil, naphtha, natural gas and condensate. These raw materials are used in the production of both saleable products and energy. The Company also purchases electric power, benzene, ethylene, propylene and styrene to supplement internal production. Expenditures for hydrocarbon feedstocks and energy accounted for 35 percent of the Company’s production costs and operating expenses for the year ended December 31, 2009. Other significant raw materials include acrylonitrile, flame retardants, aniline, bisphenol, methanol, rubber, carbon black, ammonia, formaldehyde, acetic acid and toluene diamine.

Materials purchased, including hydrocarbons that were consumed as fuel, were of the magnitude of 74 million metric tons. An additional 15 million metric tons of brine was mined as raw material for chlorine-related production. The mass of materials sold in final products (direct materials) was of the magnitude of 40 million metric tons. A Supply Chain project is examining the carbon and energy footprint of the Company and this assessment may provide for improved future reporting of materials in and materials out for the company.

EN2 Percentage of materials used that are recycled input materials

In 2009, the Company announced an additional sustainability goal: to implement 300 million pounds of by-product synergy between 2005 and 2015. As of the end of 2009, we have identified and redeployed 244 million pounds of useable material bringing us to 77 percent of the 2015 commitment. This new effort matches under-valued waste or by-product streams from one facility with potential users at another facility to create new revenues or savings with potential social and environmental benefits. See more on how companies are collaborating to help find these synergies through the World Business Council for Sustainable Development.

Dow exceeded its cumulative target by 12 million LBs, achieving 244 million LBs of by-product synergy through the end of 2009.

The Chlor-Alkali business is the major feedstock producer for key Dow processes that use chlorine. In some cases, instead of consuming the chlorine, a manufacturing process will “rent” the chlorine molecule. Afterward, the chlorine molecule is returned as hydrochloric acid (HCl) to the Chlor-Vinyl business, which uses it to make key raw materials for products such as polyvinyl chloride (PVC). PVC offers important properties for blood bags, vinyl siding, municipal water piping and a host of other essential products. The Chlorinated Organics business recovers chlorinated by-product streams and turns them into raw materials for refrigerants, pharmaceuticals and other products for sale on the merchant market. This systems integration helps Dow keep costs low and recycle raw materials. The combined value of Dow’s Basic Chemicals recycling engines conserves more than $200 million per year in raw material costs. In addition, these recycling processes avoid disposal of hundreds of railcars of waste annually.

Due to the complex nature of Dow’s products and processes, most do not involve externally sourced recycled raw materials. One example of the use of externally sourced recycled material is in the production of perchloroethylene by Dow Chlorinated Organics. Dow obtains...
carbon tetrachloride by-product streams from several external companies in order to harvest the chlorine molecules needed to make our product. The relationship benefits both parties – the generators of carbon tetrachloride avoid high disposal costs and Dow reduces consumption of virgin chlorine molecules.

### Aspect: Energy

#### EN3 Direct energy consumption by primary source

The direct energy consumed by the Company to produce product in 2009 was 328 trillion Btu, or 346 million gigajoules. Approximately 49 percent of this direct energy was generated from purchased fuel gas and 51 percent was fuel from feedstock. Additional direct energy consumption such as that occurring in office buildings and research facilities is small in comparison to the energy consumed in manufacturing operations. A tool utilized within heritage Rohm and Haas sites is being implemented in 2010 to gather non-manufacturing energy usage. This will provide a way to track usage and facilitate prioritization of improvement opportunities in non-manufacturing facilities.

#### EN4 Indirect energy use by primary source

Indirect energy is a challenge to aggregate by source in a company with diverse operations that operate globally and engage in the purchase and the sale of energy. In 2009, the Company estimates that indirect energy to produce product came from power and steam totaling 166 trillion Btus, or 175 million gigajoules. Approximately 7 percent of purchased electricity is hydroelectric, driven by operations in Aratu, Brazil. Additional indirect energy consumption such as that occurring in office buildings and research facilities is small in comparison to the energy consumed in manufacturing operations. This additional non-manufacturing energy consumption is not aggregated by the Company at this time.

#### EN5 Energy saved due to conservation and efficiency improvements

Dow has saved the equivalent of more than $9.2 billion and 1,700 trillion Btu by decreasing its energy requirements per unit of production when measuring the annual impact of savings each year using the average cost of energy in that year and the improvement in energy intensity compared to a 1994 base.

Energy intensity improved 22 percent during the first 10-year Energy Intensity Goal (1994-2005), exceeding the 20-percent improvement target for the period. In 2006, Dow defined a new 10-year Energy Intensity Goal to drive an additional 25-percent improvement in energy intensity by 2015 using 2005 as the basis for comparison. Energy intensity improvements from 2005 through 2009, have resulted in avoided energy consumption of 78 trillion Btu.

Dow identified a significant opportunity for energy efficiency in late 2007 as it was faced with renovating its deteriorating Houston Dow Center, the primary office facility for Dow in Houston, which housed 1,200 employees. Determined to leverage the new construction for the most benefit, Dow decided to pursue LEED certification (Leadership in Energy and Environmental Design), an internationally recognized green building certification, and set energy savings milestones for the new construction. Of the four progressive levels of LEED certification, Certified, Silver, Gold and Platinum, Dow initially set its goal to become Certified. However, throughout the construction process Dow and its partners utilized energy efficient materials and practices, and were able to achieve Gold-level LEED certification. Some of the energy efficiency programs included using construction materials comprised of at least 90 percent recycled materials, designing “open” office spaces to save on materials and cooling costs, and integrating highly efficient ENERGY STAR appliances, such as LED talk lighting, flat panel monitors and kitchen equipment.

The new LEED-certified Houston Dow Center reduced total electrical usage by 47.7 percent compared to 2008 requirements.

#### EN6 Initiatives to provide energy-efficient or renewable energy-based products and services

The year 2009 was very significant for STYROFOAM™ brand insulation, the product that builders have trusted for more than 60 years for its superior moisture resistance and long-term R value retention. Conversion was completed to a new zero ozone-depleting, no-VOC (volatile organic compound) foaming agent technology. See EN17 to read more about how STYROFOAM insulation helps prevent greenhouse gas emissions over its useful life.
Dow has been developing Building Integrated Photovoltaic (BIPV) building materials that enable solar energy cells to be incorporated directly into the design of commercial and residential building materials. The DOW™ POWERHOUSE™ Solar Shingle was named a best invention of 2009 by TIME magazine. It delivers true building-integrated aesthetics by integrating PV functionality into an asphalt roof-shingle form factor. It utilizes high-efficiency, CIGS-based, PV cells manufactured on a flexible substrate. These cells are laminated and subsequently over-molded into the final shingle design using conventional materials and polymer processing methods. Dow's groundbreaking technology integrates low-cost thin-film photovoltaic cells into a roofing shingle design, which represents a multi-functional solar module. The innovative product design reduces installation costs because the conventional roofing shingles and solar generating shingles are installed simultaneously.

While the rapid growth of photovoltaic technology has been capturing headlines along with market share for years, the Company is also shedding light on a less widely known, but viable means: Concentrating Solar Power systems, or CSP. DOWTHERM™ Performance Fluids are enabling thermal solar power plants to collect heat and convert it to electrical energy. One large installation in southern Spain involves three plants that deliver 150 megawatts, enough to power about 90,000 homes every year.

The use of AERIFY™ diesel particulate filters from Dow Automotive, a business unit of Dow, can enhance fuel efficiency and performance due to a 30 to 50 percent reduction in back-pressure relative to other filters. AERIFY DPFs efficiently capture soot particles from the engine exhaust stream at the same time providing minimal restriction and pressure increase on the hot exhaust air passing through the system. This directly translates into increased engine power and significantly reduced non-renewable fuel consumption. Visit Innovations for Clean Powertrain Solutions to learn more.

Dow products contribute to the generation of 2,400 megawatts of renewable wind energy each year. Windmill blades that use STYROFOAM™ brand extruded polystyrene and AIRSTONE Systems for Wind Energy are key components in many wind turbines operating today.

Alternative Feedstocks
Feedstocks are the raw materials Dow uses to manufacture a wide array of products that we use everyday. More than 96 percent of all manufactured products are based in chemistry — and the building block for this begins with feedstocks. The challenge is that feedstocks are some of the world’s most highly sought-after commodities — oil and natural gas. Because global energy demand is projected to grow by more than 50 percent by 2030, Dow continues to focus on new and sustainable options for manufacturing in an energy-challenged world.

Visit Alternative Energy & Feedstocks to learn more about some of the 36 projects in various stages of development around the world.

EN7 Initiatives to reduce indirect energy consumption and reductions achieved
About a third of the energy required to produce product is indirect and is scrutinized by our ongoing drive for energy efficiency in manufacturing operations that helped drive the energy efficiency savings described in EN5. The cost reduction efforts in employee office behavior, purchasing of materials, outbound shipping, commuting, and subcontracted production are not significant when compared to the hydrocarbon raw materials and energy requirements of Dow. Various efforts continue to underscore that individual contributions of every employee help save energy and reduce cost. The reductions achieved have not been quantified.

Aspect: Water
In the 2008 GRI Report Dow highlighted four drivers behind its commitment to affordable, safe and sustainable water supplies. Since the publication of the last report significant progress has been made against all four.

1. Drive a 35 percent reduction in the cost of water reuse and desalination, through component technology advances
In June, Dow Water & Process Solutions (DW&PS), a leading global supplier of advanced technologies for purification and separation processes that make water safer, cleaner and more available, launched two new DOW FILMTEC™ elements for brackish water treatment. Both technologies reduce system cost through lower energy requirements and maintenance and by providing improved water quality and extended membrane life. At Singapore’s International Water Week (SIWW) these elements were recognized as two of the top innovations for 2009.

DW&PS also commercialized a new ultrafiltration module. Thanks to its unique design only two-thirds of the normal number of modules is needed to treat water. This leads to both a significant cost reduction in capital and operation expenditures as well as an impact reduction.

In addition, Dow Agrosciences continues the development of groundbreaking drought-resistant and salt-tolerant crops and products that inhibit the release of nitrogen into the ground water.

2. Be a key enabler of low-cost technologies and business models for small water treatment systems in the developing world
By the end of 2009, Dow’s long-term partner International Aid started transferring its water operations to Cascade Engineering of Grand Rapids, Michigan, USA. This includes the transfer of patents, manufacturing and further development of the Hydraid® bio-sand...
filter. Cascade Engineering is working with a number of non-profit organizations including Pure Water for the World and Rotary International to distribute these filters to Haiti and other regions around the world. Dow continues to support this effort through the funding of a health impact study completed at the University of North Carolina and through the donation of resins for the filters.

Dow Water & Process Solutions (DW&PS) is focusing on sustainable drinking water in areas where centralized water treatment infrastructure is not available and will likely not be practical in the near future in developing economies. The business unit is taking the same technology that is utilized in the most sophisticated water treatment facilities in the world (e.g., Ashkelon, Israel; Perth, Australia, etc.) and making it practical for small communities where at least initially the raw water quality issues are such that just simple disinfection methods are not adequate for producing WHO-quality potable water. For example, in Gujarat, India, Dow’s sustainable drinking water program, 24 Karat Water Solutions™, has provided more than 700,000 liters of clean drinking water to rural villages. Utilizing Dow Water & Process Solutions reverse osmosis (RO) technology, the program aims to set up water purification plants to provide access to a clean drinking water supply at a minimum maintenance cost of Rs. 2 per 10 liters of water. Money raised from the sale of the water by a local NGO provides funds for ongoing plant operation and maintenance as well as training of local plant operators, which combined can ensure a long-term sustainable pure drinking water solution for the rural population.

3. Develop and implement minimal discharge plant designs while continuously improving Dow’s water use efficiency

Since February 2007, municipal household waste water has been flowing via a special pipeline to Dow’s second largest site at Terneuzen, The Netherlands, where it is reused. Dow accepts 2.6 million gallons of water every 24 hours and purifies more than 70 percent of it to generate steam and feed manufacturing plants. Thus, Terneuzen’s waste water gets a second and third life at Dow. This was the first step in a multi-year plan to reduce freshwater intake by 35 percent. During 2009 the site has started identifying additional non-freshwater sources and developed a plan for the third phase of this project.

In Freeport, Texas, cooperative efforts between Dow and Nalco Company resulted in annual water savings of one billion gallons of freshwater at Dow’s largest production site. That’s enough water to supply nearly 40,000 people in the U.S. for one year.

Dow is currently designing new plants for sites in UAE, India, Russia and China. Our Environmental Technology Center is working with the project teams to ensure the principles of (near) Zero Liquid Discharge are incorporated. Each site brings its own unique challenges, but experiences at other locations allow the team to design the locally most economical and viable solution to optimize water use/recycle.

4. Catalyze awareness and action on the global safe water crisis through leading innovative partnerships with corporations, NGOs and government agencies

Dow is a leading supporter of the United Nations’ CEO Water Mandate, a mechanism of engagement of the business sector toward the issue of clean and affordable water for all. The mandate entails
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EN9 Water resources significantly affected by withdrawal of water

The World Business Council for Sustainable Development water analysis tool has helped bring focus and prioritization to our planning for potential future challenges. It is location-specific, based on projected renewable freshwater supply per capita.

Each Dow manufacturing facility located in a water-stressed region (as defined by the World Business Council’s Global Water Tool) has a specific water risk management plan addressing the local/regional water challenges. The risk management plan is unique to local drivers.

During 2010, we will assess our locations in the context of source water bodies including new sites where Dow has operations and revise our list of priority sites.

EN8 Total water withdrawal by source

Water intake, shown in millions of cubic meters, is substantially unchanged when compared to 2005.

### Water Intake

<table>
<thead>
<tr>
<th></th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
</tr>
</thead>
<tbody>
<tr>
<td>Millions of Cubic Meters</td>
<td>3,105</td>
<td>2,881</td>
<td>3,140</td>
<td>2,887</td>
<td>3,089</td>
</tr>
</tbody>
</table>

EN10 Percentage and total volume of water recycled and reused

Recycle and reuse totals are not compiled for the total Company.

One billion gallons of fresh water has been saved as a result of implementing Nalco’s innovative 3D TRASAR® Technology for Cooling Water to treat the 80 process and comfort cooling tower systems for the 5,000-acre Freeport, Texas, site. That’s enough water to supply nearly 40,000 people in the U.S. for one year.

Dow Terneuzen, The Netherlands, restructured its water process to recycle 80 percent of the freshwater. In 2007, the site and its partners, Evides and the Zeeland-Flanders District Water Board, expanded the concept by integrating with local municipalities to use local sewage water for industrial use. Combined, the projects annually reduce treatment chemicals by 500 tons, reduce CO₂ emissions by more than 57,000 tons, reduce energy sufficient to
power 1,000 residences, and preserve the local freshwater supply. By July 2010, an add-on Membrane Bioreactor system at the municipal waste water treatment plant will debottleneck RO pretreatment for demineralized water production to Dow. After completion, the municipal recycle will achieve plan at enhanced quality. A feasibility study has been started to explore the use of alternative freshwater sources in the region.

Aspect: Biodiversity

Biodiversity is the variation of life on Earth. The biodiversity found on Earth consists of many millions of distinct biological species. It is often used as a measure of the health of biological systems. Human needs for food, fiber, medicines and other resources are dependent upon the preservation of the Earth’s biodiversity. Biodiversity loss is the reduction in the variation of life on Earth. Tied to five key trends – habitat loss, pollution, climate change, invasive species, and over-exploitation – it threatens human welfare and business success alike. Biodiversity and ecosystem goods and services make a crucial contribution to human well-being and to future economic and social development.

Dow has made meaningful contributions to biodiversity in the past through site-level conservation activities, products and technology, and NGO partnerships. During 2009, the Company explored an expanded commitment looking for the best ways to aggregate and measure conservation activities, establish biodiversity screens for suppliers, and strategically engage stakeholders around biodiversity.

During 2009, we explored mapping our sites in relation to legally protected and globally important sites for biodiversity using the Integrated Biomonitoring Tool (IBT) for Business. This tool consolidates biodiversity data from a variety of conservation organizations and may help Dow better understand our global footprint in order to make more informed strategic biodiversity decisions. We intend to continue defining our role in addressing biodiversity in a sustainable way by understanding more about our ecosystem services footprint and creating a formal Dow biodiversity and ecosystems services strategy in 2010.

In Terneuzen, The Netherlands, the Dow site encompasses approximately 1,300 acres located adjacent to the Western Scheldt River. This river has been identified as a nature protection area in the framework of the European network of nature areas, Natura 2000. The Terneuzen site has conducted a nature impact assessment for the river based on emissions and waste water discharges of the site. Including emission control measures already taken, the resulting overall conclusion is that there is no impact of the site on protected species in the area. The site cooperates with government bodies and other industries in the region on the development of a comprehensive nature management plan for the river, balancing nature protection and economic activities.

Dow’s site in Guarujá, Brazil, (coast city in the state of São Paulo) is located in an 800,000 m² area surrounded by the Atlantic Forest (Mata Atlântica) – ranked among the top five conservation priorities worldwide.

Dow facilities located in the State of Bahia, Brazil, (Aratu and Salt Mining Operations) are surrounded by the extremely diverse Atlantic Forest with its unique mix of vegetation and forest types. The Aratu Site has a total area of 480,000 m² and the Salt Mining Operations (Matarandiba Island) is made up of 930,000 m².

Wildlife biologists from the Illinois Department of Natural Resources’ Natural History Survey positively identified a Blanding’s turtle on the Joliet, Illinois, site. Blanding’s turtles are an Illinois State Threatened Species. The Joliet site covers 680 acres, of which about half is prairie, wooded or wetlands.

The following have been identified as locations where Dow operations are located near high biodiversity areas:

EN12 Description of significant impacts on biodiversity in protected areas and areas of high biodiversity value

The Company is not aware of events in 2009 causing significant impacts on biodiversity in protected areas or areas of high biodiversity value. Our Environmental, Health & Safety Remediation group manages historic environmental liabilities associated with known or suspected contamination of soil and groundwater at Dow or Dow subsidiary sites, which includes operating sites and legacy sites. Legacy sites are defined as surplus properties where Dow or a Dow subsidiary or acquisition has operated in the past and no longer has operations. Our Land Revitalization program defines our long-term stewardship of these land assets and manages these sites to maximize
the total value to Dow and the adjacent communities while managing the known or suspected contamination of soil and groundwater.

**EN13 Habitats protected or restored**

**Netherlands**

Regional stewardship for the preservation and development of nature reserves is one of the elements of Dow’s Community Success strategy in Terneuzen. For a number of years Dow has adopted the wetland reserve Het Verdronken Land van Saeftinghe, a unique nature reserve alongside the Western Scheldt River close to Terneuzen.

**Brazil**

Dow has delivered $1.5 million over the past three years through its charitable foundation to The Nature Conservancy for the restoration of 865 acres surrounding a key reservoir of the Cantareira Water System, one of the largest water supply systems in the world. The Piracicaba-Capivari-Jundiai (PCJ) watershed, where the Cachoeira Restoration Project is located, provides water through the Cantareira Water System to nearly 9 million people in the São Paulo metropolitan region – Brazil’s largest city. Over the past two years, Dow’s support for The Nature Conservancy restored 129 acres of land, created 23 new jobs and a community-based restoration cooperative, developed a carbon revolving fund, increased public awareness in the project area and inspired and motivated at least three other restoration projects spanning 931 acres in the Cachoeira Reservoir.

Related to operations in Guarujá, Brazil, Dow developed three important environmental programs: Clean Mangrove (education for community members about the local environment), Bird’s Port (recovering and improving the attractiveness for birds in all areas of the Guarujá Marine and Terminal) and Ambassadors of the Environment (partnership with Jean-Michel Cousteau’s Ocean Futures Society to provide education and unique experiences for students in a preserved mangrove area). These efforts work to bring about appreciation and preservation of the local biodiversity.

**Mexico**

Dow joined efforts with the Mexico City government and the Community of San Nicolás Totolapan to rescue the last living river of the city. Working together, Dow and the communities will create work opportunities, encourage water conservation and infiltration, and create a model that can be replicated within the community.

The first stage of the project focused on the organic production of herbs in greenhouses at 3,000 meters above sea level. This included the training of the women elected to participate in the project, conditioning of the area and harvesting of herbs. Strong environmental awareness has been developed with community members, and eco-technologies have been added to the infrastructure.

Some of the best-preserved forests in Mexico City belong to the community of San Nicolás Totolapan for which San Nicolás forest is considered as a “water factory” (an important provider of environmental services for Mexico City).

Dow joined efforts with PRONATURA and two municipalities of the state of Tlaxcala – Apizaco and Tetla de la Solidaridad – to recover the Atenco River, in order to create a model intended to be applied to other stressed water sources. The project includes environmental awareness, education, reforestation, cleaning campaigns, soil retention and biodiversity preservation. More than 500 volunteers have helped begin the process of restoring the area and establishing a sustainable ecosystem.

**South Africa**

The Ground Hornbill Project in Mpumalanga, through the Associated Private Nature Reserves, is aimed at conserving the endangered ground hornbill species. The peculiar-looking terrestrial bird is slow breeding, making it challenging to increase the numbers that have been estimated to be less than 2,000 individuals. The program has been supported by Dow from inception through funding for nesting sites and operational costs.

**North America**

During 2009, the employees, volunteers and partners at The Dow Wetlands Preserve in Pittsburg, California, further distinguished themselves by winning The Wildlife Habitat Council’s (WHC) prestigious Corporate Lands for Learning award for outstanding environmental education, stewardship and voluntary efforts. The WHC also provides third-party objectivity regarding the following Dow conservation projects as part of Corporate Wildlife Habitat Certification/International Accreditation:

- Dalton, Georgia, site; certified since 1991
- Dow Wetlands Preserve, Pittsburg, California; certified since 1993
- Joliet site, Channahon, Illinois; certified since 1990. A bluebird nesting program continues to be a source of pride for the Joliet site. It is now common to observe bluebirds on the property. Canada geese, mallards and wood ducks continue to nest in natural areas in and around the wetlands each year.
- Union Carbide West Virginia Operations, South Charleston site – Technology Park; certified since 2007
Taking Responsibility for Our Impact on the Environment

- Texas Operations, Freeport, Texas; certified since 1992
- Union Carbide Corporation Disposal site, Sault Ste. Marie, Michigan; certified since 2006
- Western Canada Operations, Fort Saskatchewan, Alberta, Canada; certified since 1999

An additional habitat preservation site has been established at the River Road Landfill, Piscataway, New Jersey.

**EN14 Strategies, current actions, and future plans for managing impacts on biodiversity**

Following Dow’s 2015 Sustainability Goals and our Company Value of Protecting Our Planet, Dow will continue its efforts on nature conservation in different geographies and engage with other stakeholders to better understand and enhance our contribution to preserve and restore biodiversity and ecosystem services. Dow has invested in meaningful conservation activities at our sites. These activities have typically been driven by local site leaders and involved local communities through educational and recreational activities. Dow has won three awards from the Wildlife Habitat Council (WHC) for a wetlands reserve at the Pittsburg, California, site. In addition to local conservation, Dow has restored many acres of wetlands as part of state-regulated wetland mitigation banking schemes in Texas, Florida, Louisiana, California and other states.
### Conservation Activities

<table>
<thead>
<tr>
<th>Location</th>
<th>Activity</th>
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<tbody>
<tr>
<td>Aratu, Brazil</td>
<td>Shellfish conservation</td>
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<tr>
<td>Atlantic Forest, Brazil</td>
<td>Atlantic Forest conservation</td>
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<tr>
<td>Brazil</td>
<td>Hortis Institute</td>
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<tr>
<td>Bryanston, South Africa</td>
<td>Ground hornbill conservation</td>
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<td>Dalton, Georgia, USA</td>
<td>Hardwood forest conservation</td>
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<tr>
<td>Fort Saskatchewan, Canada</td>
<td>Greenbelt program</td>
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<tr>
<td>Freeport, Texas, USA</td>
<td>Nature preserve, skimmer colony, Sea Colony</td>
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<tr>
<td>Guarajá, Brazil</td>
<td>Clean Mangrove program</td>
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<tr>
<td>Horgen, Sweden</td>
<td>Conservation of Sihlwald Natural Park</td>
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<tr>
<td>Jakarta, Indonesia</td>
<td>Mangrove restoration</td>
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<tr>
<td>Joliet, IL, USA</td>
<td>Prairie restoration project</td>
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<tr>
<td>Kasaoka, Japan</td>
<td>Hermit crabs breeding</td>
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<td>King’s Lynn, UK</td>
<td>Heathland restoration</td>
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<td>Lake Jackson, Texas, USA</td>
<td>Marine hatchery</td>
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<td>Leuterberg, Germany</td>
<td>Turtle conservation</td>
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<td>Midland, Michigan, USA</td>
<td>Chippewa Nature Center</td>
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<td>Mozannica, Italy</td>
<td>Park and pond</td>
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<td>New Germany, South Africa</td>
<td>Invasive species removal</td>
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<td>Piscataway, New Jersey, USA</td>
<td>Streambank restoration</td>
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<tr>
<td>Pittsburg, California, USA</td>
<td>Wetland reserve</td>
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<td>Plaquemine, Louisiana, USA</td>
<td>Fishery restoration</td>
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<td>Rhine Center, Germany</td>
<td>Owl habitat restoration</td>
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<td>Seadrift, Texas, USA</td>
<td>Wildlife Management Area</td>
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<tr>
<td>Schkopau, Germany</td>
<td>Bird nesting habitat</td>
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<td>South Charleston, West Virginia, USA</td>
<td>Technology park</td>
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<tr>
<td>St. Mary’s, Ontario, Canada</td>
<td>Wetland restoration</td>
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<tr>
<td>Sterlington, Louisiana, USA</td>
<td>Black Bayou Wildlife Park</td>
</tr>
<tr>
<td>Terneuzen, Netherlands</td>
<td>Nature reserves</td>
</tr>
</tbody>
</table>

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**EN15 Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk**

This will be in scope in 2010 as we continue to better understand our eco-system services footprint. This information is not collected at this time.

**Aspect: Emissions, Effluents and Waste**

In several of the following Environmental Performance Indicators, a value for 1994 is provided for perspective because it was the base year that marked the beginning of our first 10-year EH&S Sustainability Goals commitment. These 1994 values should NOT be used as an absolute for comparison purposes.

The emissions information reported in the following chart includes data from heritage Rohm and Haas operations, unless noted otherwise. NOTE – Dow’s 2008 GRI Report pre-dates the acquisition of Rohm and Haas.

**EN16 Total direct and indirect greenhouse gas emissions by weight**

Direct greenhouse gas (GHG) emissions are from sources controlled by Dow and include Kyoto and non-Kyoto GHGs. Our 2009 direct GHG emissions, expressed as carbon dioxide equivalents, decreased 7 percent from 2008 to 2009.
One of the 2015 Sustainability Goal metrics is to reduce the intensity of greenhouse gas emissions per unit of production. During 2009, Dow’s GHG emissions were 0.89 metric tons per metric ton of production, about a 1 percent increase from base year 2005. This increase is due to lower operating rates. By improving energy efficiency and implementing technology improvements, Dow’s goal is to reduce GHG intensity 2.5 percent per year from 2005 to 2015.

Kyoto GHG intensity is the sum of CO₂ equivalent direct and indirect emissions of the “Kyoto” family of greenhouse gases divided by unit of production.

**EN17 Other relevant indirect greenhouse gas emissions by weight**

Dow’s most significant “other indirect emissions” are avoided emissions resulting from the use of Dow products such as insulation. A Life Cycle Assessment documented that emissions saved by Dow insulation products are about six times greater than total company direct and indirect Kyoto and non-Kyoto GHG emissions. This calculation was made by quantifying the GHG emissions at all stages of the life cycle of the Dow insulation product and comparing these with the GHG emissions savings from the use of the insulation products in buildings and pipe systems.

Emissions from transportation of Dow products to customers are in the magnitude of five million metric tons per year. The total CO₂ equivalent indirect emissions resulting from commercial air travel were estimated to be 14,230 metric tons during 2009, a 27 percent reduction from the prior year. The total CO₂ equivalent indirect emissions resulting from rental car use were estimated to be 3,940 metric tons.

Dow has an ownership position in many joint ventures that are separately held corporations and are operated by the joint venture, not by Dow. Dow considers the emissions from joint ventures separately from scope under the GHG protocol.

**EN18 Initiatives to reduce greenhouse gas emissions and reductions achieved**

Dow’s vision for climate change is reflected in its 2015 Sustainability Goals – a public commitment to hold ourselves accountable in the pursuit of solutions to pressing global challenges.

Through this commitment, and that of our previous corporate 2005 EH&S Goals, we have reduced the company’s absolute GHG emissions by more than 20 percent since 1990, representing a more rapid reduction than required by Kyoto Protocol targets. The energy savings resulting from increased efficiency since 2005 through 2009, as reported in EN5, can be converted to equivalent GHG emissions avoided equaling 4.1 million metric tons of CO₂. The activities described in EN6 and EN7, and implementing new processes that emit less GHGs compared to traditional routes, will also be important to driving reductions in the future.

Dow is making significant financial investments in R&D to contribute to the slowing, stopping and reversal of the rate of GHGs being emitted. Dow participates in the EU emissions trading scheme (ETS) and is a member of the United States Climate Action Partnership (USCAP), an organization of leading corporations and environmental NGOs calling for swift government action to slow, stop, and reverse the rate of greenhouse gas emissions.

For more information on Dow’s position on addressing the issue of climate change, read Dow’s vision paper titled Working to Solve the World’s Energy and Climate Challenges.

**EN19 Emissions of ozone-depleting substances by weight**

Between 1994 and 2005, Dow has reduced ozone-depleting substances by approximately 73 percent. Ozone-depleting emissions were reduced an additional 13 percent from 2008 to 2009.
EN20 NOx, SOx, and other significant air emissions by type and weight

Between 1994 and 2005, Dow has achieved approximately 65 percent in NOx (nitrogen oxides) reduction. Overall NOx has been reduced an additional 11 percent from 2008 to 2009.

Between 1994 and 2005, Dow achieved a 40 percent reduction in SOx (sulfur oxides) emissions. Emissions of SOx have decreased an additional 21 percent from 2008 to 2009.

Volatile organic compounds are a selection of organic chemicals excluding low vapor pressure materials (chemicals with vapor pressures >0.0001 atmospheres minus the chemicals found on the U.S. EPA exclusion list). Dow has seen a 52 percent reduction in VOC emissions between 1994 and 2005.

Emissions of VOCs have decreased an additional 11 percent from 2008 to 2009.

In addition to ozone-depleting substances, Dow also tracks chemical emissions (excluding items such as NOx, SOx, CO, CO₂, particulates, methane, hydrogen, nitrogen, oxygen, water, aluminium, and certain salts). Between 1994 and 2005, Dow reduced chemical emissions by approximately 57 percent. Dow’s continued efforts have decreased chemical emissions by an additional 4 percent from 2008 to 2009. This metric is compiled for emissions to both air and water.
EN21 Total water discharge by quality and destination

(Dow tracks wastewater with intensity metric)

A joint eco-efficiency study conducted by Dow and BASF revealed the new HPPO process reduces wastewater by 70 to 80 percent and energy use by approximately 35 percent, compared with existing propylene oxide technology. Wastewater is the amount of water sent for treatment before discharge. Wastewater intensity is the ratio of pounds of wastewater per pound of production. Dow is dedicated to implementing innovative ways to conserve water, which includes implementing source reductions as well as identifying creative ways to reuse water. Wastewater intensity increased 4 percent from 2008 to 2009.

Dow has not aggregated information other than wastewater sent to water treatment facilities. Dow has used the ratio of wastewater to production as a way to monitor the efficiency of use of water in our production processes over time.

EN22 Total weight of waste by type and disposal method

(Dow tracks waste with an intensity metric)

Wastes are materials that receive treatment. Waste intensity is the ratio of pounds of waste generated per pound of production. Waste intensity has declined 5 percent since 2005 and is down slightly compared to last year. The use of waste intensity numbers allows Dow to effectively compare progress from year to year as the Company grows.

EN23 Total number and volume of significant spills

No spills were of a magnitude that required reporting in the organization’s financial statement.

Dow has long monitored and set goals to improve performance in the area of spill avoidance. During 2009, in operations around the world including those acquired during the year, the total of all LOPC events was 520 incidents. This was a reduction of 32 percent from the prior year total and reflects our best annual results on record. The 2015 Goal of no more than 130 incidents is a 90 percent reduction from 2005.
EN24 Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII and the percentage of transported waste shipped internationally

The information is not reported by the Company at this time.

Dow has a Right Waste, Right Place strategy with regard to management of all waste. This involves evaluation of waste situations to see if they can be eliminated or reduced in size. Secondly, we look for other uses for the streams – either internally or externally – as feedstocks or for reclamation purposes. As a last option, we develop a reliable way to dispose of materials that can’t be utilized in any other way. For hazardous waste, our first choice in most cases is to bring the wastes to one of our own disposal facilities. In some situations it is appropriate to use third-party facilities, but only after they have undergone a thorough audit conducted by a third-party auditor and been reviewed for safety and environmental concerns.

EN25 Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by discharges of water and runoff

This information is not collected by the Company at this time. We are in the process of mapping our sites in relation to legally protected and globally important sites for biodiversity using the Integrated Biomonitoring Tool (IBT) for Business.

Aspect: Products and Services

EN26 Initiatives to mitigate environmental impacts of products and services and extent of impact mitigation

Dow accepts the responsibility to be a steward of both the current environment and of the future, on behalf of generations to come. We identify chemicals and health as a priority issue. To learn more about our Policy on Chemicals Management, visit the Product Responsibility section on dow.com.

2015 Sustainability Goal – Addressing Climate Change

Dow operates at the nexus between energy and all the manufacturing that occurs in the world today. Over 90% of the products made have some level of chemistry in them, so no one has more at stake in the solution – or more of an ability to have an impact on – the overlapping issues of energy supply and climate change than we do.
One initiative to mitigate the environmental impacts of products is through the 2015 Sustainability Goal, Product Safety Leadership. A focus of this goal is to develop Product Safety Assessments (PSAs) for all Dow products by 2015. During 2009, we completed 80 additional assessments and posted them on our PSA website. The PSAs are easy-to-understand summaries, available on-line to help customers and the public have access to useful information about our products. We track our progress each quarter toward completing a PSA for all products at Sustainability Reporting on dow.com.

Another mitigation initiative involves a European offering called the SAFE-TAINER™ system from SAFECHEM. Coupled with additional service elements for solvent monitoring, this approach has provided more than 80 percent reduction in solvent waste and an 80 percent reduction in primary solvent requirement. The environmental impact accomplished is a reduction of 10 percent for photochemical oxidation, 25 percent for human toxicity and around 70 percent for other environmental impact categories. Introducing SAFECHEM Chemical Leasing offers the potential to even further reduce solvent consumption by 40-80 percent.

Other mitigation efforts include our Product Stewardship program (See PR1 and PR3) and our commitment to implement the European Union regulation for the Registration, Evaluation, Authorisation and Restriction of Chemicals known as REACH. All of Dow’s products are on track to be in compliance with coming requirements related to REACH.

EN27 Percentage of products sold and their packaging materials that are reclaimed by category

Dow products typically exist upstream in the value chain. The reclamation of the products can be understood only in the context of their end use. Due to the highly varied end uses in which Dow products are consumed, no estimate of the downstream product reclamation rates has been undertaken. Customers are often receiving Dow products in bulk quantities, and no packaging is involved.

Aspect: Compliance

EN28 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations

Using the Dow incident reporting system that is part of EH&S reporting, fines and penalties are captured globally regardless of size or significance, and payment is reported based on the year paid. This incident reporting system does not classify whether a fine is related to product, the environment, or other focus of law.

Other than the alternate pay amounts, the Company does not have non-monetary sanctions to report for 2009, nor is there awareness of a case or cases that should be disclosed as events brought through dispute resolution.

The actual dollars paid in fines for year 2009 was $742,991. In lieu of paying a fine or penalty, alternate pay amounts usually encompass projects benefiting the environment or local community, such as pollution prevention or remediation programs, public awareness, education activities, or wetland conservation activities. An additional amount of $269,894 is identified in the alternate pay category for 2009.

Aspect: Transport

EN29 Significant environmental impacts of transporting products and other goods and materials used for the organization’s operations and transporting members of the workforce

During 2009, Dow continued to advance rail safety and security. Working with TRANSCAER (Transportation Community Awareness and Emergency Response), local emergency responders and community leaders experience hands-on demonstrations and educational workshops. More information about the UP/Dow TRANSCAER Training Tour, including schedule and training details, can be found at TRANSCAER Training Tours. A progress report of how the two companies are on track to increase rail safety and security is available on dow.com.

To help minimize significant environmental impacts resulting from transporting products, Dow tracks the Hazmat Transportation Loss of Primary Containment (LOPC) count (Serious, Moderate & Minor incidents). During 2009 there were 31 events, three of which involved Highly Hazardous Materials. Highly Hazardous Materials are those that pose a toxic inhalation hazard or are a flammable gas. The Company is striving to reduce the occurrence of Hazmat Transportation LOPC incidents to fewer than 14 per year, with no incidents involving Highly Hazardous Materials by 2015.
Dow believes it is part of our corporate responsibility to reduce the volumes of Highly Hazardous Materials that need to be transported. We have set a 2015 Sustainability Goal to reduce the number of tonne-miles (a measure of how much we’re shipping and how far) by 50 percent from our levels in 2005, which was 1,410 million tonne-miles. Dow will accomplish this by looking at ways to redesign our supply chain to reduce or eliminate many shipments or the distances they must travel. (A tonne-mile is one metric ton of freight moved 1 mile or 1.6 km.)

Aspect: Overall

EN30 Total environmental protection expenditures and investments by type

The costs specifically identified as environmental operations were $505 million during 2009. Significantly more related costs are incurred, but are not specifically accounted for as environmental expenditures. Dow invested $219 million of capital identified specifically for environmental purposes during 2009. Provisions established for environmental remediation worldwide amounted to $619 million as of December 31, 2009.
A Good Place to Work
Dow strives to offer a workplace where everyone is included, where performance and contributions are valued, and where employee engagement and satisfaction are a priority. This commitment reflects our values of Integrity and Respect for People.

Our Labor Policies and Philosophies
Dow recognizes and adheres to all labor and employment laws wherever it operates, including those respecting freedom of association, privacy and equal employment opportunity. Dow believes that working positively and directly with employees best serves their interests. Dow also strives to work cooperatively with duly chosen employee representatives in the common pursuit of the interests of the employees and the Company’s mission.

Dow encourages employees to report observed or suspected violations of the law and Dow Policies, including the Code of Business Conduct. In such situations, employees are encouraged to report their concerns to their supervisors, other Dow Managers, Human Resources, the Office of Ethics and Compliance or the Dow EthicsLine.

Dow’s office of Ethics and Compliance works closely with the Dow Regional Ethics and Compliance Committees to conduct periodic Ethics and Compliance Risk Assessments to identify potential risk areas in the Dow regions around the globe and then respond with targeted education and corrective actions.

Policy Framework: A series of policies define expectations of employees at all levels for behavior that is consistent with our values. These are available to all employees on our internal website, My HR Connection. This familiar location provides a repository of the portfolio of total rewards the Company provides, including competitive pay, comprehensive benefits, learning and training, career opportunities, health programs and more.

Here are samples of key policies related to a respectful workplace:

Respect & Responsibility: It is Dow’s policy that employees be provided a work environment that is respectful and free from any form of inappropriate or unprofessional behavior, such as harassment including sexual harassment, pestering or bullying and any form of unlawful discrimination based on sex, gender, race, sexual orientation, gender identity, disability, age, ethnic origin, or other inherent personal characteristic protected by law. The Company sponsors over 100 global chapters of Employee Diversity Networks, bringing together people to share experiences, find mentors, seek professional development, and gain access to senior leadership.

Tracking & Mentoring: All employees must complete mandatory training on the Respect & Responsibility policy on a regular interval and completion is tracked. Concerns of policy violations can be reported using the Dow EthicsLine, which is available globally, with multi-lingual capabilities, 24 hours a day, seven days a week and is operated by an external vendor. All complaints are investigated. Statistics regarding ethics complaints are published quarterly for employees on Dow’s intranet homepage.

Equal Employment Policy: Dow is committed to creating and maintaining an environment in which all Dow people have an equal opportunity to reach their potential and contribute fully to the success of the Company. All Dow employees can expect to work in a professional environment free from discrimination and are expected to fully comply with the requirements of this policy.

• New employees participate in a four-hour Understanding Diversity & Inclusion workshop and new people leaders participate in a 1.5 day workshop on leading inclusively
• A quarterly Diversity & Inclusion scorecard is produced for senior leaders
• Pay equity studies are conducted at regular intervals

People with Disabilities: People living with disabilities are a unique source of talent who can deliver substantial value to our company, our customers and our communities. Dow is committed to the recruitment and development of top talent, including individuals who happen to live with a disability. Through Dow’s continued focus on the Human Element, and our fostering of a diverse world-class organization, we believe our position on people with disabilities and our commitment to work with them to create success set our Company apart.

Maintaining a Healthy and Diverse Workforce
Dow’s health and safety rules are designed to provide a safe and healthy work environment and meet applicable health and safety laws. As found in Dow’s Code of Business Conduct, each employee must be aware of the rules and procedures that apply to the workplace, diligently follow the rules, and encourage others to do the same.

Dow’s Drive to Zero program is an internal effort to drive Dow employees and contractors to exceptional safety performance. It reinforces Dow’s vision for EH&S – zero injuries and illnesses, zero incidents, and zero environmental harm. Dow’s Vision of Zero means...
it will not tolerate injuries and illness among its workforce. This important commitment is reflected in the 2015 Sustainability Goal, Local Protection of Human Health and the Environment.

Violence in the Workplace: Dow has adopted a policy on Violence in the Workplace. Consistent with this policy, acts or threats of violence including intimidation, harassment, and/or coercion, which involve or affect the Company and/or its employees, or which occur on Company property, or on Company business, will not be tolerated.

Career-Long Learning
To ensure our employees are always in the forefront in their respective fields, Dow encourages continuous learning – in classrooms, on assignment, through mentoring, and on the web. More than 2,200 employees have participated in Great Start @ Dow within the last 12 months, an on-boarding development program addressing the role of specific issues that are important during an employee’s early experience at the company. We offer our employees a wide array of training and education opportunities. In 2009, Dow employees and contractors completed two million instructor-led or self-paced courses against required and recommended corporate, functional and role-specific training expectations.

Code of Conduct/Compliance Risk Assessments: Dow encourages employees to report observed or suspected violations of the law and Dow Policies, including the Code of Business Conduct. In such situations, employees are encouraged to report their concerns to their supervisors, other managers, Human Resources, the Office of Ethics and Compliance or the Dow EthicsLine.

Dow’s office of Ethics and Compliance works closely with the Dow Regional Ethics and Compliance Committees to conduct periodic Ethics and Compliance Risk Assessments to identify potential risk areas in the Dow regions around the globe and then respond with targeted education and corrective actions.

The most senior position with responsibility for Labor Aspects is the vice president for Human Resources, Gregory Freiwald.

What You’ll Find in This Section
A detailed overview of our employment and labor responsibilities and obligations, including:

- A comprehensive look at our workforce. LA1 and LA2
- Benefits for our full-time employees. LA3
- Our labor/management relationships. LA4 and LA5
- Issues related to our employees’ health and safety. LA6 – LA9
- Issues related to our employees’ education, training and evaluation. LA10 – LA12
- The diversity of our workforce. LA13
- The basic pay structure for our employees. LA14
Labor Performance Indicators

Aspect: Employment

LA1 Total workforce by employment type, employment contract, and region

Total Dow Workforce: 52,195 employees as of December 31, 2009, and as reported in Profile section 2.8.

Breakdown by Employment Type: 96.3 percent of all Dow employees are full-time and the remaining 3.7 percent of employees are part-time.

Breakdown by Employment Contract: 96.2 percent of Dow employees are permanent and the remaining 3.8 percent work under a temporary arrangement.

Breakdown of Total Employee Population by Region: See section 2.8 for employees by geographic area.

LA2 Total number and rate of employee turnover by age group, gender, and region

In reporting attrition rates, the total employee population is defined based on a monthly average throughout the year: 52,767 employees.

Dow reports attrition based on the number of regular employees who leave the Company and attrition is based on both voluntary exits and involuntary reductions. The voluntary attrition rate was 4.3 percent and the involuntary rate was unusually high (11.6 percent) due to significant restructuring and acquisition-related integration activities during the year.

The following information by category is based on a breakdown of voluntary attrition rates. Voluntary attrition rates are the focus here as they are more reflective of company culture, working conditions and employee satisfaction or dissatisfaction. Involuntary reductions are more a reflection of business conditions.

The rates of attrition by gender:

• 3.9 percent for males
• 5.6 percent for females

Dow does not report attrition based on age, but rather on years of service. The rates of attrition for years of service, based on average headcount for these groups, are found in the charts to the right.

The rates of attrition by region, based on average headcount for these groups, are:

• 4.3 percent Globally
• 3.7 percent for North America
• 3.1 percent for Latin America
• 4.8 percent for Europe
• 11.3 percent for India
• 3.4 percent for Middle East, and Africa
• 4.9 percent for Pacific excluding China
• 6.3 percent for China

LA3 Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations

Dow makes a wide variety of benefits available to all eligible regular full-time and less-than-full-time employees that work 20 or more hours per week. Plans vary considerably by country as Dow’s benefit plans are designed to build on the social security benefits provided in each country, and social security systems vary widely.

Dow typically offers the following benefits to employees in most of the countries where it does business:

• Pension plans – either defined benefit or defined contribution where market practice dictates
• Medical plans – often including prescription drug coverage and dental
- Life insurance
- Disability protection
- Accident insurance
- Paid vacation, holiday and leave programs
- Business travel accident
- Stock purchase plan

**Aspect: Labor/Management Relations**

LA4 Percentage of employees covered by collective bargaining agreements

6,871 employees (13 percent) in Dow’s workforce are covered by collective bargaining agreements.

LA5 Minimum notice periods regarding operation changes, including whether it is specified in collective agreements

Dow keeps employees well informed of operational changes through a variety of channels. Global, business and functional specific news is communicated through our global intranet that can be accessed by any Dow employee in a variety of languages. In addition, leaders consistently cascade communications through the organization to Dow employees. These communications occur in a timely and effective manner.

While there is no global minimum time frame for notifying Dow employees of significant operational changes, Dow makes every effort to give a reasonable amount of notice to all employees in the event of a significant change. Dow has a proven history in recognizing and respecting all labor and employment laws in the countries in which it operates. Under these laws, the company has adopted reasonable and effective communication tools for notifying employees of operational changes.

**Aspect: Occupational Health and Safety**

LA6 Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs

Dow is involved in works councils in those countries where mandated by law. The Manufacturing and Engineering function utilizes many approaches to safety as part of Dow’s long established focus on preventing injuries. The Drive to Zero program, the visibility of the importance of safety in every function, and the resulting Injury and Illness rate performance all give evidence that everyone is involved in making Dow a safe place to work.

Dow has a well-developed health strategy focused on prevention, quality, health system management and advocacy. This strategy helps challenge employees and provides them with the tools and information they need to take action to invest in their personal health and the health of their families.

LA7 Rates of injury, occupational diseases, lost days, and absenteeism and the number of work-related fatalities by region

As a component of our EH&S 2005 Goals, Dow set a target to reduce the Injury and Illness rate by 90 percent compared to 1994. Our actual improvement was 84 percent. The progress made in reducing our rate of injury and illness since 1994 has prevented more than 20,500 events involving Dow employees and contractors.

The 2015 Sustainability Goal target is to drive Injury and Illness rate to no more than 0.12 incidents per 200,000 hours, representing another 75 percent reduction. This target reflects the new population and historical performance of the Company including the impact of the acquisition of Rohm and Haas.

![Injury and Illness Rate](image-url)

(Recordable Incidents/200,000 work hours)

1994 rate does not include heritage Rohm and Haas population.
The following information from the American Chemistry Council provides context for Injury and Illness performance (for U.S. operations):

<table>
<thead>
<tr>
<th>Comparative Injury/ Illness rate (incidents / 200,000 hours)</th>
<th>Values for 2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dow employees and contractors</td>
<td>0.4</td>
</tr>
<tr>
<td>Responsible Care® chemical companies</td>
<td>1.0</td>
</tr>
<tr>
<td>All manufacturing</td>
<td>5.6</td>
</tr>
</tbody>
</table>

Days Away from Work Injury and Illness Cases (DAWC) are included in the Dow Injury and Illness data. In 2009, DAWC occurred at a rate of 0.09 per 200,000 hours.

In June 2009, as a result of a roof fall, a fatality occurred at the mine in Weeks Island, Louisiana, an operation of the Morton Salt business (acquired as part of the April 1, 2009, acquisition of Rohm and Haas).

Information on absenteeism is not aggregated by the Company.

**LA8 Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families or community members regarding serious diseases**

<table>
<thead>
<tr>
<th>Assistance Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program recipients</td>
</tr>
<tr>
<td>Workers</td>
</tr>
<tr>
<td>Workers’ families</td>
</tr>
</tbody>
</table>

Dow offers medical benefits programs to employees and their families that cover a range of preventive, diagnostic and treatment services. Programs vary by country and other criteria. Dow Health Services makes the following available in the area of Occupational Health and Health Promotion services:

- **Employee clinical treatment services for work-related conditions and limited non-work-related conditions through approximately 83 Dow internal clinics globally.**

- **Health Promotion programs are offered to all employees and often retirees and their dependent family members as well. These programs include education on important health risks, opportunities to assess those risks and a variety of interventions that individuals can participate in to reduce their risk.**

- **Employee Assistance Programs are offered globally. These provide assistance and individual counseling for a variety of personal issues impacting employees and their families.**

Dow employees, including Dow Health Services staff, have participated in or provided a variety of targeted programs that impact health beyond our employee groups. Some examples include: providing dental health services in underserved areas, HIV/AIDS programs, women’s health concerns, health presentations and health fairs. Dow also has partnered with several groups to improve clean water supplies in many communities throughout the world.

General review of medical surveillance testing results for specific Dow workgroups has not shown an increased incidence or high risk of disease.

**LA9 Health and safety topics covered in formal agreements with trade unions**

This information is not collected by the Company at this time.

**Aspect: Training and Education**

**LA10 Average hours of training per year per employee by employee category**

Training and education varies by job role and responsibilities. On average, there were 42 hours of training per employee during 2009. Dow has extensive training programs for employees involved in every job category.

Dow’s training opportunities include both traditional and virtual classroom instructor-led training, hands-on training, blended training, and an extensive database of on-line training courses.

<table>
<thead>
<tr>
<th>Training Hours / Employee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative</td>
</tr>
<tr>
<td>Professional level employee</td>
</tr>
<tr>
<td>Technical employee</td>
</tr>
<tr>
<td>Other</td>
</tr>
<tr>
<td>Total for company</td>
</tr>
</tbody>
</table>
LA11 Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings

For the past two years, benefits counselors have assisted approximately 1,600 employees per year with benefits questions and other activities such as completion of retirement paperwork. Dow employees are provided with career and career-ending resources on a company intranet site: Late Stage Career Planning. Employees take advantage of these offerings to enhance their employability and plan for career endings:

- Values Self-Assessment
- Plateauing Brochure
- Career Orientations and Constraints
- Employee Development Discussions
- Mentoring at Dow
- Active employees have access to Human Resource Service Center
- Retiree Service Center
- Benefits counseling is available in cases where the Service Centers are not able to address the employee's questions
- Financial planning through Fidelity

LA12 Percentage of employees receiving regular performance and career development reviews

Dow’s performance management process is designed to provide Dow with a consistent method of aligning goals and performance expectations, provide ongoing feedback, review performance, and improve the performance of all Dow employees. make the appraisal process meaningful across the wide diversity of global jobs. Each employee's evaluation is recorded in Dow's performance management system. During 2009, leaders reported that they delivered a formal performance review to 97.6 percent of employees who were active during the year-end period when the evaluation cycle took place. Geographic transfers, temporary leaves, recent hires, and job changes within the Company are factors that cause the number of reviews to be less than 100 percent.

Aspect: Diversity and Equal Opportunity

LA13 Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership and other indicators of diversity

Diversity and Inclusion Strategy:

As a global company whose employees represent over 100 citizenships, Dow recognizes the vital importance of diversity and inclusion to its overall business success. As such, the Company has put in place a comprehensive Diversity and Inclusion strategy to ensure we attract, develop, advance and retain a diverse workforce around the world and nurture a working environment characterized by respect and inclusion.

Dow's strategy is anchored by three corporate Diversity and Inclusion Goals, which were established in 1996 by Dow’s executive leadership. Behind each goal is a set of metrics and actions to drive progress:

Goal 1: To be the “Employer of Choice” in strategic markets where we recruit talent.

- Tracking & Monitoring
- Global Acceptance Rates
- Targeted “Best Employer” Awards

Key Results:

Working closely with our seven global Employee Diversity Networks, with more than 100 chapters worldwide, we have established a strategic list of “Best Employer” awards targets that are meaningful to various segments of our population. These

Dow strives to have every employee take advantage of meeting with his or her supervisor for a review of performance and development opportunities at least annually.
awards establish criteria for what it means to be an Employer of Choice within various diverse communities and provide a competitive performance benchmark against “best practices” in the marketplace. Among the awards Dow has garnered:

- Five consecutive years of receiving a 100 percent rating on the Human Rights Campaign’s Corporate Equality Index, for best practices in creating an inclusive environment for people of all sexual orientations and gender identities
- The National Society of Black Engineers 2009 Golden Torch Award for Corporate Diversity Leadership for our efforts to recruit from underrepresented minorities
- The São Paulo State Government presented Dow Brazil with its 2009 Diversity Seal award
- For the 13th time, Dow Brazil earned recognition as one of the best companies to work for in Brazil according to “The 150 Best Companies to Work For” Guide
- Apertura magazine and Great Place to Work recognized Dow as one of the best companies to work for in Latin America
- The 2008 U.S. Department of Labor’s New Freedom Initiative Award for excellence in hiring people with disabilities
- “Top 100 Employers for Working Mothers,” compiled by Working Mother Magazine in 2008 and 2009, as well as recognition by the National Association of Female Executives as a Top Company for Executive Women in both 2009 and 2010

Goal 2: Develop a workforce that reflects the places we do business today and tomorrow.
We have established goals to increase the representation of women, U.S. ethnic minorities, and Asian citizens in leadership positions. This includes ensuring that women, ethnic minorities in the United States, people with disabilities, and Asian citizens are represented in our leadership levels. The following help us track our progress:

- Quarterly Diversity Scorecard. The scorecard is reviewed by senior Human Resources leadership and members of the Executive Leadership Committee.
- 2012 goals to address underrepresentation in leadership. Since establishing the goals in 2005, we have increased the number of minorities and women in leadership positions by 34 percent and 28 percent, respectively, and steadily increased the number of women, minorities, and Asian citizens in our leadership pool compared to our 2005 baseline.

Several initiatives support this goal:

- External partnerships with organizations such as the National Society of Black Engineers, Society of Hispanic Engineers, Society of Women Engineers, and the National Council on Business and Disability.
- Active Employee Diversity Networks. Our Women’s Network celebrated its 20th anniversary in 2009 and has just added its newest chapter in Dubai.
• Mentoring programs.
• World-class Leadership Development and Executive Education programs.

Goal 3: Create a workplace characterized by respect and where people value diverse perspectives. The following help us track our progress:
• The Diversity and Inclusion Index compiled as part of the Global Employee Opinion and Action Survey (GEOAS)
• Diversity and Inclusion questions in the Employee Opinion and Action Survey

Several initiatives support this goal:
• Diversity and Inclusion-oriented training that reaches all levels of the organization and is embedded within our new employee orientation and leadership development programs
• Specialized workshops to meet emerging needs covering gender communications, the maturing workforce and disability etiquette
• Efforts to raise cross-cultural awareness and understanding, ranging from lunch-time language classes to access to an on-line Cultural Navigator

Progress on all three goals is tracked at the corporate level and reported quarterly to the Company’s executive leadership. Accountability for achieving the goals rests with the presidents of each of Dow’s five geographic regions, thereby ensuring that local needs are fully incorporated and addressed.

Diversity of Dow’s Board of Directors: Of 12 Directors, 33 percent are either female (3) or U.S. ethnic minority (1)

The CEO has 13 direct reports that form the Executive Leadership Committee, 23 percent of whom are either female (1) or U.S. ethnic minority (2).

Diversity indicators for the overall employee population

<table>
<thead>
<tr>
<th>By gender, globally:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>74 percent</td>
</tr>
<tr>
<td>Female</td>
<td>26 percent</td>
</tr>
</tbody>
</table>

Diversity indicators for the 22,421 employees in Professional and Management job positions

<table>
<thead>
<tr>
<th>By gender:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
</tr>
<tr>
<td>Female</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>By U.S. ethnic minority:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minority</td>
</tr>
<tr>
<td>Non minority</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>By age:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 30</td>
</tr>
<tr>
<td>30 to 50</td>
</tr>
<tr>
<td>Over 50</td>
</tr>
</tbody>
</table>

Diversity indicators for the 225 employees in the Global Leader category

<table>
<thead>
<tr>
<th>By gender:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
</tr>
<tr>
<td>Female</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>By U.S. ethnic minority:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minority</td>
</tr>
<tr>
<td>Non minority</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>By age:</th>
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</thead>
<tbody>
<tr>
<td>Under 30</td>
</tr>
<tr>
<td>30 to 50</td>
</tr>
<tr>
<td>Over 50</td>
</tr>
</tbody>
</table>
**LA14 Ratio of basic salary of men to women by employee category**

Dow conducts pay equity studies in an effort to verify that the Company is compensating employees fairly. The most recent analysis confirms that the basic salary for men and for women is not statistically different when differences for months in grade, age, highest education, years of service and performance rating are considered.

The following provides the unadjusted data by comparing the ratio of male to female base salary within three example grade levels for three job families. In this illustration no adjustment is made for months in grade, age, highest education, years of service and performance rating. The differences in pay are driven by these factors, not by gender.

<table>
<thead>
<tr>
<th>Family/Grade</th>
<th>Gender</th>
<th>Average Base Salary (US$)</th>
<th>Ratio of Male to Female</th>
</tr>
</thead>
<tbody>
<tr>
<td>Admin 1</td>
<td>Male</td>
<td>32,241</td>
<td>1.05</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>30,573</td>
<td></td>
</tr>
<tr>
<td>Admin 2</td>
<td>Male</td>
<td>35,695</td>
<td>0.88</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>40,587</td>
<td></td>
</tr>
<tr>
<td>Admin 3</td>
<td>Male</td>
<td>39,496</td>
<td>0.77</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>51,247</td>
<td></td>
</tr>
<tr>
<td>Tech 1</td>
<td>Male</td>
<td>42,944</td>
<td>0.98</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>43,691</td>
<td></td>
</tr>
<tr>
<td>Tech 2</td>
<td>Male</td>
<td>56,517</td>
<td>1.03</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>54,680</td>
<td></td>
</tr>
<tr>
<td>Tech 3</td>
<td>Male</td>
<td>64,821</td>
<td>1.05</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>61,898</td>
<td></td>
</tr>
<tr>
<td>Professional 1</td>
<td>Male</td>
<td>69,927</td>
<td>1.04</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>67,124</td>
<td></td>
</tr>
<tr>
<td>Professional 2</td>
<td>Male</td>
<td>88,798</td>
<td>1.01</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>87,895</td>
<td></td>
</tr>
<tr>
<td>Professional 3</td>
<td>Male</td>
<td>109,699</td>
<td>1.02</td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>107,875</td>
<td></td>
</tr>
</tbody>
</table>

**Overall Pay Equity Analysis**

![Adjusted pay: Least squares mean](chart)

Adjusted pay: Least squares mean

Female

Male
Human Rights

2009 Global Reporting Initiative Report
Dow believes that respect for a person’s dignity, rights and aspirations should be the cornerstone of any business’s ethics. Integrity, Respect for People, and Protecting Our Planet have always been the core of the way we do business, and through the global enforcement of Dow’s Code of Business Conduct, we uphold our human rights position.

This enforcement includes our Office of Ethics and Compliance that oversees ethics and compliance efforts, as well as serves as a resource for Dow employees and contractors by providing training, information and guidance regarding issues of legal compliance and ethical conduct.

Dow understands that an effective ethics and compliance program requires a company to create an open and transparent environment. In addition, it’s where employees and stakeholders can feel comfortable raising issues they believe are inconsistent with a company’s Code of Business Conduct – without the threat of retaliation. Dow’s Code of Business Conduct addresses many ethical principles and policies created to deal with issues such as bribery, political contributions, diversity, equal opportunity, respect in the workplace, as well as environment, health and safety.

The Code includes these key points:
- Dow recognizes and respects all labor and employment laws – including those respecting freedom of association, privacy and equal employment opportunity – wherever it operates. Dow believes that working positively and directly with employees best serves their interests. Dow also strives to work cooperatively with duly chosen employee representatives in the common pursuit of the interests of the employees and Dow’s mission.
- Dow expects employees to avoid any activity, investment, association or interest that might reflect unfavorably upon the integrity or good name of the Company or them. They are obligated to place Dow’s interest in any business transaction ahead of any personal interest or personal gain to either themselves or to their spouse, family member or other individual.
- Dow complies with all child labor laws and understands that children may legitimately perform tasks that do not interfere with their education and do not negatively affect their health, safety and development. Dow seeks to have a positive impact on the reduction of unlawful child labor and child exploitation. Dow expects the suppliers and contractors with whom it does business to embrace similar values and standards.
- Dow’s policy is to provide all employees with an environment of mutual respect that is free from any form of harassment and discrimination. Harassment and discrimination of any form is not acceptable and will not be tolerated. In some countries, harassment is against the law; in all countries, it is wrong under Dow standards.
- The Dow EthicsLine is a toll-free help line, available 24 hours a day, seven days a week. In addition, Dow employees can also access the EthicsLine via an on-line reporting option. Either option provides the employee with the choice of remaining anonymous, as permitted by the governing jurisdiction. The EthicsLine is available to Dow employees who wish to ask questions about Dow policy, seek guidance on specific situations and report violations of Dow’s Code of Business Conduct or other unethical business practices.

All Dow employees around the globe are expected to adhere to the Code of Business Conduct in the daily performance of their job responsibilities. The Code can be found on Dow’s website. Information about this training can be found in HR4.

Dow is also committed to security and safety. This commitment encompasses our employees, sites, products and communities where we operate and has always been deeply embedded in the Company’s culture and business processes. We constantly assess the risks to our people, facilities, supply chain and information systems and then adjust security levels to address these risks. Dow’s position and actions on public safety and security are also available on the Company website.

These important commitments are reflected in the 2015 Sustainability Goal, Contributing to a Community’s Success.

The most senior position with responsibility for Human Rights Aspects is the chief sustainability officer, which is held by David E. Kepler II.

What You’ll Find in This Section
A detailed overview of our human rights responsibilities and obligations, including:
- The investment agreements and contractors and suppliers that have undergone human rights screening. HR1 and HR2
- How we’ve ensured that all of our employees understand the Company’s commitment to human rights. HR3
- The number of incidents of discrimination that have occurred in 2009 and the actions taken. HR4
- Operations that have put collective bargaining at risk. HR5
- A reinforcement of our stance on child labor. HR6
- A reinforcement of our stance against compulsory labor. HR7
- The number of security personnel who have been trained regarding our stance on human rights. HR8
- The number of human rights violations that have occurred against indigenous people. HR9
Human Rights Performance Indicators

Aspect: Investment and Procurement Practices

HR1 Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening

During 2008, Dow refined its process for due diligence and implementation phases of mergers, acquisitions and joint venture formations. We completed a pilot assessment project that included human/social impact on a proposed project. This initial learning experience will guide similar assessments in the future and help ensure that the potential for human and social rights issues will be readily identified and prudently assessed. The guidance document for EH&S items to be addressed during formation of all future joint ventures requires that ethical and human rights practices and policies be included.

During 2009, we continued to make progress. Our largest development and joint venture projects include some aspect of human rights requirements in order to highlight relevant issues.

HR2 Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken

Dow seeks quality products and services through mutually beneficial and ethical relationships with suppliers who act responsibly, respect the environment and demonstrate integrity in the marketplace. At this time, no significant suppliers or contractors have undergone human rights screening. Please refer to Supplier Responsibilities for more information.

HR3 Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained

Dow has taken steps to ensure all employees are aware of and understand the Company’s Values of Integrity, Respect for People, and Protecting Our Planet and the Company’s commitment to human rights.

Dow actively encourages reports of potential policy violations through ongoing communications and training and offers employees several different avenues to do so. They may raise concerns with their leader, Human Resources, or through the Dow EthicsLine. The EthicsLine is a safe, reliable and convenient alternative to reporting ethical concerns in person. It is available globally, with multi-lingual capabilities, 24 hours a day, seven days a week. The EthicsLine is operated by Global Compliance Services (GCS), a professional vendor.

HR4 Total number of incidents of discrimination and actions taken

Based on available records, there were no substantiated incidents of illegal discrimination in 2009. Dow defines incidents of discrimination as substantiated findings of a violation of local law and/or Dow’s internal policies, which state:

It is Dow’s policy to provide all employees with an environment of mutual respect that is free from any form of harassment and discrimination. Harassment and discrimination of any form is not acceptable and will not be tolerated. In some countries, harassment is against the law; in all countries, it is wrong under Dow standards. Dow’s global Respect & Responsibility policy expressly forbids: “employment related actions that adversely impact an employee, have no legitimate business purpose, and are based on unwarranted individual differences or prejudice, such as sex, gender, race, sexual orientation, gender identity, disability, age, ethnic origin or other inherent personal characteristic protected by law.”

Dow seeks quality products and services through mutually beneficial and ethical relationships with suppliers who act responsibly, respect the environment and demonstrate integrity in the marketplace.
located in Charlotte, North Carolina, that specializes in providing similar services to global companies. No call tracing or recording devices are ever used, and callers may remain anonymous if they choose as permitted by the governing jurisdiction. Employees also have the option of reporting to the EthicsLine through the web.

Concerns are promptly reviewed, investigated and depending upon the findings, appropriate actions are taken to address violations and other issues in the work environment. In reviewing concerns raised during this period, Dow did take actions to support a productive work environment. Such actions have included:

- Specific training or communications for particular work groups.
- Individual coaching, communications or counseling as required for leaders and employees.

These case-by-case, as-needed actions supplement our global initiatives around Diversity and Inclusion that include, but are not limited to:

- **Training**
  - Global workshops on Diversity and Inclusion, as well as on-line training regarding our policies. [Note: Both of these are embedded into our New Employee Orientation globally, ensuring all employees are aware of Dow’s expectations as they join the company.]
  - Inclusive Leadership training for new people leaders.

- **Employee Diversity Networks**
  - Dow now has approximately 100 chapters of its seven Employee Diversity Networks operating around the world. These networks provide support for employees as they pursue personal and professional development and provide insights to the Company on how to become more inclusive.

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**Aspect: Freedom of Association and Collective Bargaining**

**HR5 Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk and actions taken to support these rights**

No operations are identified that put collective bargaining at risk. Dow’s position on freedom of association is included in our Code of Business Conduct Labor Policy, which reads:

*Dow believes that respect for the dignity, rights and ambitions of all people is a cornerstone of business excellence in the 21st Century. This policy extends to every Dow employee and to all people who work at any of Dow’s facilities around the world. We expect the suppliers and contractors with whom we do business to embrace similar values and standards.*

*Dow recognizes and respects all labor and employment laws – including those respecting freedom of association, privacy and equal employment opportunity – wherever it operates. Dow believes that working positively and directly with employees best serves their interests. Dow also strives to work cooperatively with duly chosen employee representatives in the common pursuit of the interests of the employees and the Company’s mission.*

Under this policy, employees are free to form collective bargaining agreements in all areas of operation. As noted in LA4, there are currently 6,056 employees globally who are covered by collective bargaining agreements.
Aspect: Child Labor

HR6 Operations identified as having significant risk for incidents of child labor and measures taken to contribute to the elimination of child labor

Dow prohibits unlawful child labor and child exploitation. Dow’s position on child labor is reflected in our Code of Business Conduct and our position statement on child labor, which state:

Dow complies with all child labor laws. We understand that children may legitimately perform tasks that do not interfere with their education and do not negatively affect their health, safety and development. Dow seeks to have a positive impact on the reduction of unlawful child labor and child exploitation. Dow expects the suppliers and contractors with whom we do business to embrace similar values and standards.

Dow has identified no significant risks for incidents of child labor or young workers exposed to hazardous work either as a function of our type of operations or of the locations where we operate. Child labor is addressed as part of the ongoing risk analysis in each of Dow’s 14 Regional Ethics and Compliance Committees.

Aspect: Forced and Compulsory Labor

HR7 Operations identified as having significant risk for incidents of forced or compulsory labor and measures to contribute to the elimination of forced or compulsory labor

Dow’s position on forced or compulsory labor is included in our Labor Policy in our Code of Business Conduct. See HR5 for Labor Policy.

We have identified no operations with a significant risk for forced or compulsory labor in either operations or based on geographies with operations that might be more inclined to be at risk.

Aspect: Security Practices

HR8 Percentage of security personnel trained in the organization’s policies or procedures concerning aspects of human rights that are relevant to operations

Security personnel, whether proprietary or contract company employees, fully comply with the Company's training, policies and
procedures concerning human rights. This training is a condition of employment and is conducted on a repetitive basis.

In addition to this baseline training requirement, security personnel are subject to additional functional and situational training in areas relative to human rights. The Company has many secure and anonymous communication methods (as permitted by the governing jurisdiction) for reporting human rights violations, and any reports of such violations are fully investigated and appropriately addressed.

Aspect: Indigenous Rights

HR9 Total number of incidents of violations involving rights of indigenous people and actions taken

No incidents of violations of indigenous people were reported for the reporting period.
Society
Dow believes our role is to drive positive change, from beyond corporate scope into local communities and across the globe. We place a high value on listening to our communities, striving to be a good neighbor and a positive global corporate citizen. We understand that, through strong relationships, we are building better, stronger, more sustainable communities in the places where we do business.

The 2015 Sustainability Goals have led Dow to implement a more progressive model for community success. While Dow continues its robust community relations programs, we have progressed from being “in” the community to now being “of” the community. This commitment is global and Dow has taken steps to partner with local communities in an effort to better understand and address quality-of-life issues identified by the communities where we have a presence.

Dow’s community success process includes a comprehensive community survey to better gauge quality-of-life issues, as well as Dow’s reputation, within a given community. This is followed by a site leadership workshop as part of an effort to decipher the qualitative and quantitative input and strategically develop a plan that can be implemented to address these issues annually.

Whether we’re directly addressing community needs or using our leadership position to influence other organizations, Dow’s community success process allows us to work directly with our communities to build even stronger relationships.

Making a Global Impact
Dow is a member of the United Nations (UN) Global Compact, the world’s largest voluntary corporate citizenship initiative. It’s comprised of more than 4,000 companies from more than 120 countries, working to achieve advances in the areas of human rights, labor, environment and anti-corruption. As a part of Dow’s Global Compact involvement, the Company also supports the UN CEO Water Mandate and Caring for Climate initiatives. The CEO Water Mandate is a private-public initiative with a focus on developing strategies and solutions to contribute positively to the emerging global water crisis. Caring for Climate is a voluntary action platform for those UN Global Compact participants who seek to demonstrate leadership on the issue of climate change.

Another way Dow contributes to society is through The Dow Chemical Company Foundation. The Foundation serves Dow’s philanthropic needs by providing charitable gifts to eligible non-profit organizations that contribute to community success and support sustainability, while fostering science in society and stimulating innovation. In 2009, Dow and The Dow Chemical Company Foundation contributed $26.8 million to support a wide range of programs around the world.

Taking Action in Government
Dow believes government action is one of the most significant forces impacting companies today. Dow’s future depends on our ability to understand societal trends; stay informed of pending government, trade, NGO and IGO activities; and partner appropriately to find positive solutions that address the common good.

Dow Government Affairs professionals, located around the world, offer expertise in essential areas of the public and international policy process, including policy development, process expertise and relationships. They identify legislative issues of importance to Dow and develop strategies to positively affect the outcome for our company. Dow’s Government Affairs professionals build relationships with key government stakeholders, policy influencers, lawmakers, coalitions, and trade and business associations that impact Dow’s interests and business concerns.

Working with the Community
The Dow Sustainability Corps (DSC) is our employee engagement program that deploys the capabilities and expertise of Dow employees on external projects and programs, addressing sustainable development challenges and opportunities. After pursuing four pilot projects in 2009, DSC will be enhanced in 2010 by building key working relationships with environmental and development non-governmental organizations and social entrepreneurs.
In all cases, Dow's interactions with society are guided by our Company's Values of Integrity, Respect for People and Protecting our Planet. Dow's Code of Business Conduct summarizes many of the ethical principles and policies created to deal with issues such as bribery, competition, political contributions, equal employment opportunity, and environment, health and safety. All employees at Dow, no matter where they happen to live, are expected to apply these principles in the daily performance of their job responsibilities.

This important commitment is reflected in the 2015 Sustainability Goal, Contributing to Community Success.

The most senior position with responsibility for Society Aspects is the chief sustainability officer, which is held by David E. Kepler II.

What You’ll Find in This Section
A detailed overview of our societal responsibilities and obligations, including:

- The feedback mechanisms used to assess our impact in communities. S01
- Dow business units analyzed for risks. S02
- The employees trained in anti-corruption policies and procedures, and the actions taken in corruption complaints and investigations. S03 and S04
- How we stand on the issues and why we participate in setting public policy, especially science. S05
- The amount of money we donate to political parties. S06
- The legal actions against Dow for anti-competitive behavior, anti-trust and monopoly practices and their outcomes. S07
- How much we pay in fines and the sanctions against us. S08
Aspect: Community

SO1 Nature, scope, and effectiveness of managing impact on communities

Dow has multiple feedback mechanisms in place for assessing the impacts of operations on local communities. (These primarily focus on the impact of the Company in locales where facilities are in existence. Other project investment study and community research is involved before initiating a new facility in a new location.)

Dow has been an industry leader in establishing and running Community Advisory Panels (CAPs) in the communities where we have operations. The purpose of a CAP is to:

- Provide a means for open, honest, two-way communication in order to build trust and credibility
- Enable community members to ask questions or comment upon the Company's operations and activities
- Provide a way for Company representatives to learn about community concerns
- Provide information and get feedback about Company goals and operations

Dow CAPs, which are located at every major site globally, provide a constant source of feedback about the communities in which Dow operates. Having a highly effective CAP is of great benefit in the development, implementation and evaluation of Community Success Plans.

Because of Dow's longevity in the chemical industry, most of our CAPs were formed after initial operations began, following the model set forth by the American Chemistry Council. CAP members are people from a well-rounded cross-section of the community and may include business people, retirees, high school students and homemakers.

Dow also uses multiple survey feedback mechanisms. The Community Success Survey, a tool developed as part of the 2015 Community Success Goal, is a two-part survey that generates valuable feedback on issues related to “quality of life” and “reputation” of Dow. It provides a clear picture of community issues, priorities and concerns, as well as the areas in which local businesses could have impact. It also provides a general understanding of Dow’s “favorability” within an area that Dow considers its community.

Before the Community Success Survey, Dow sites used Reputation Surveys. These surveys were used to establish benchmarks measuring the Company’s reputation compared to other Dow communities and peer companies.

Dow also uses The Key Influencer Survey at both large and small sites. This survey, much like the Community Success Survey, provides data on community issues, priorities and concerns, as well as reputation. However, it is designed to focus on those individuals Dow considers leaders within their community. The Key Influencer Survey can be used as support data for the larger, more comprehensive Community Success Survey.

Dow’s Community Success Goal pulls together the various inputs (surveys, community data and CAP input) to develop implementation plans that form the basis of assessing our impact on the community over time. There are currently 10 large sites globally that are actively engaged in the Community Success process. Dow is currently assessing which of 10 strategic sites are ready to be re-measured. Progress will be determined based on comparison to baselines that were gathered from the initial Community Success Survey. As an example, Midland, Michigan's favorability was 84 percent while Dow’s impact on quality of life (or making the community a better place to live) was 62 percent.

The 10 strategic sites in 2009 included: Pittsburg, California; Terneuzen, The Netherlands; Zhangjiagang, China; Freeport, Texas; Plaquemine and Hahnville, Louisiana; Midland, Michigan; Stade and the Rhine Center, Germany; and Aratu, Brazil.

The Contributing to Community Success Goal will continue to look for ways to achieve some of the benefits of the survey approach and the Community Success implementations at other Dow locations.

For example, at Dow’s Michigan Operations manufacturing site in Midland, survey data and community input pointed to several quality of life issues in which the Company could play a positive role – economy, safety and security, education and the environment. Dow’s subsequent Community Success Plan for that region now includes an entire realigned effort including programs, sponsorships and foundation giving that meet these quality of life needs addressed by the community.

Some additional examples of community impact are seen in these example projects and partnerships:

- In Terneuzen, The Netherlands, Dow opened a technical training pilot plant at the Regional Education Center. This will provide on-the-job training for the future workforce of Dow, as well as other companies and industries.
In Aratu, Brazil, Dow developed the ECOSMAR Project – Matarambiba Sustainable and Solidarity Economy in partnership with the Federal University of the State of Bahia. The project is designed to promote sustainable development by generating jobs and income in the Matarambiba community. First-phase initiatives include a community information center and community bank.

Dow Argentina was recognized by the National Association of Economics Sciences in 2009 for its educational program “Buen Trabajo.” The program was conceived by the Dow Bahía Blanca Community Advisory Panel and was developed in an alliance with Manpower, the National Technological University, and the Bahía Blanca’s Town Hall. “Buen Trabajo” provides general and technical work skills training and intends to increase the employability and personal development of participants.

“Project Hope” in rural areas of Sichuan Province, China, focuses on the rebuilding of three schools damaged by an earthquake in 2008.

Dow provided financial contributions, as well as polyurethane product and technology, as the leading sponsor of the Jaipur Foot project in India, which will supply artificial limbs and calipers to more than 17,000 people.

Dow teamed with two non-profit organizations in South Africa that provide shelter, food and a family environment for orphans and vulnerable children affected by HIV/AIDS. Dow is assisting with operational costs and the schooling of the children.

These activities conducted at Dow sites are directly aligned with the company’s 2015 Sustainability Goal of Contributing to Community Success. The goal states that by 2015, 100 percent of Dow sites where we have a major presence will have achieved their individual community acceptance ratings, which measure the community’s favorability with how Dow plays a positive role in making the community a better place to live.

In addition to the examples above, Dow continues to play a significant and collaborative role working with local municipalities around water infrastructure development.

Aspect: Corruption

SO2 Percentage and total number of business units analyzed for risks related to corruption

Risk reviews are an integral part of Dow’s Ethics and Compliance program. Dow’s CEO has appointed key Dow personnel to serve as members of Dow’s 14 Regional Ethics and Compliance Committees (RECCs) to address all the geographical areas where Dow conducts business.

Dow’s Office of Ethics and Compliance maintains an ongoing dialogue with all 14 RECCs regarding the potential risks in the regions, including the risk of corruption. In addition, the Office of Ethics and Compliance stresses the importance of an ongoing risk analysis in each of the RECCs. Dow has been piloting a new risk-review tool to assist the RECCs with their risk-review process. By the end of 2010, all 14 RECCs will have implemented the new risk-review tool.

The efforts of the Office of Ethics and Compliance and the RECCs are in addition to the Dow Enterprise Risk Management Process and the ongoing efforts of the Dow Legal Department to counsel the businesses on potential risks.

See the Dow Code of Business Conduct for more information.

SO3 Percentage of employees trained in the organization’s anti-corruption policies and procedures

Dow requires on-line Foreign Corrupt Practices Act (FCPA) training for a designated audience of Dow employees based upon criteria including:

- Job level
- Job responsibilities
- Geographical location

The on-line FCPA training module is delivered to this audience of employees every three years. The FCPA module was rolled out to approximately 33 percent of the Dow employees around the world, all of whom have completed the training module. One hundred percent of active Dow Global Leader level employees completed the FCPA module in 2009.

In addition, Dow’s Office of Ethics and Compliance and Dow’s Legal Department conduct ongoing training for employees at all levels of the Company who may encounter the potential for bribery or corruption. By way of example, Dow has developed an “on-boarding” training program for selected new employees that includes a detailed discussion of FCPA and examples of recent FCPA cases.

Approximately 33 percent of employees completed an on-line Questionable Payments Certification in 2009, to better identify the possibility of improper payments or improper entries in the books and records of the Company. This is an annual certification delivered and reviewed by the Office of Ethics and Compliance in conjunction with the Corporate Controller’s Office.
Dow’s Office of Ethics and Compliance periodically provides the RECCs with highlights of major/noteworthy FCPA/anti-bribery enforcements actions as an additional means of education and awareness.

Finally, Dow periodically requires all employees to complete the on-line Code of Business Conduct training module. The Code of Business Conduct training module includes an entire section, titled Financial Integrity and Accurate Company Records, that is dedicated to Books and Records, Questionable Payments and the FCPA.

SO4 Actions taken in response to incidents of corruption

A review of the complaints and completed investigations in 2009 revealed that:

• No Dow employees were terminated for corruption-related behavior in 2009.

• No Dow employees were formally disciplined for corruption-related behavior in 2009.

• Finally, Dow required all employees to complete the on-line Code of Business Conduct training module in 2008. The Code of Business Conduct training module includes an entire section, titled Financial Integrity and Accurate Company Records, that is dedicated to Books and Records, Questionable Payments and the FCPA.

For the purposes of this Section SO4, Dow is defining “corruption” as any form of bribery involving private parties or government officials.

Dow continues with its internal control practices, training and due diligence to identify potential risk areas and to implement risk-mitigation practices within the Company. Examples of such risk-mitigation practices include, but are not limited to: FCPA and anti-bribery training, acquisition due diligence, internal financial controls, an Ethics and Compliance program that includes a strong local presence through the Regional Ethics and Compliance Committees (RECCs), and intermediary review processes.

Aspect: Public Policy

SO5 Public policy positions and participation in public policy development and lobbying

As a leader in science and technology, Dow is proud of the contributions chemistry has made to humanity. As the body of scientific research grows, we are committed to changing, evolving and continuously improving – with the conviction that science and technology can provide solutions. This knowledge, along with our commitment to sustainability, guides us as we responsibly address both the opportunities and challenges in the arena of policy development at local, national, regional and international levels.

The following are Dow’s 2009 public policy priorities:

Alternative Feedstocks

Feedstocks are the raw materials Dow needs to manufacture a wide array of products that we all use in our everyday lives. More than 96 percent of all manufactured products have some level of chemistry in them — and it all begins with feedstocks. The problem is that these feedstocks happen to be some of the world’s most highly sought-after commodities: oil and natural gas. That’s why Dow is working to develop alternative feedstocks. At Dow, the alternative feedstocks arena is about developing a robust portfolio of solutions that provide sustainable short-, medium-, and long-term alternatives to oil and natural gas, while delivering bio-based differentiated products to customers and addressing the climate change challenge.

For more information:

http://www.dow.com/innovation/markets/energy/alternative.htm

Biotechnology

Dow AgroSciences utilizes plant genetics to improve the quality of life by increasing the quality and quantity of products derived from plants — a renewable resource.

Dow AgroSciences has made a commitment to scientific, advocacy and business strategies that will continue to improve our freedom to operate and enhance our position as one of the leaders in this exciting field. Discovery is the engine that drives the commercialization of innovative genetic solutions for new and improved agricultural options for a multitude of food and non-food uses. We know that discovery rarely rewards the unprepared. We recognize and fully appreciate the unique scientific, philosophical and ethical implications of biotechnology. Dow AgroSciences has adopted principles to guide decision-making as we
apply biological knowledge and techniques to develop products and services for the benefit of our customers, shareholders and society.

For more information:
http://www.dowagro.com/pgb/commitment/

**Chemicals and Health**
Dow supports a consistent, coordinated regulatory environment for products at global, national and regional levels to complement industry voluntary efforts and to ensure a level playing field. Where new or updated regulations are required, they should be based on established scientific principles that define safe conditions for use and impose requirements to assure that use is controlled within predefined safe conditions. Such a system must rely on risk assessment and risk management principles that are predictable, flexible and capable of responsibly addressing society’s economic, environmental and safety requirements.

For more information:

**Climate Change**
Dow is uniquely positioned to continue to provide innovations that lead to energy alternatives, less carbon-intensive raw material sources, and other solutions not yet imagined. In fact, our science and technology has been contributing solutions to the global climate change and energy challenges since 1990. Our science has led to the development of alternative energy sources such as biofuels, photovoltaics and wind. Our products contribute to reduced energy consumption.

For more information:
Dow’s Position on Climate Change

**Energy Efficiency and Conservation**
Dow is uniquely positioned to continue to provide innovations that lead to energy alternatives, less carbon-intensive raw material sources and other solutions not yet imagined. Our science and technology have been contributing solutions to the global climate change and energy challenge since 1990.

For more information:
http://www.dow.com/commitments/goals/energy.htm
http://energy.dow.com/energy_plan/
Dow’s Energy & Climate Change Vision Document

**Public Safety and Security**
Dow will not compromise on our commitment to security and safety, nor will we concede our leadership position setting the standard for all others to follow. This is our business. Our commitment to the security and safety of our sites, products, and communities – where we live and work – has always been deeply embedded in our Company’s culture and our business processes.

For more information:
http://www.dow.com/commitments/safety.htm

**Water**
Dow is combining its high technology expertise with the creativity of its employees to provide innovative solutions to help supply cleaner and safer water to those in need – breakthroughs like lower cost desalination technologies, more effective ultra filtration systems, materials to improve the sustainability of water infrastructure, sustainable business models for small community water systems, and innovative ways to increase awareness of the issue.

For more information:
http://www.dow.com/commitments/goals/water.htm

**SO6 Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country**
Political Action Committees (PACs) provide for United States employee participation in the U.S. election process. In 2009, DowPAC contributed $154,000 to 71 federal candidates, $50,000 to seven leadership committees, $20,000 to two national political
parties, and $59,150 to 42 state and statewide candidates in Michigan, Pennsylvania and Texas. Contributions from DowPAC totaled $263,150.

In 2009, Dow’s corporate political contributions in the United States (non-PAC related) totaled $159,025 going to state political candidates, parties and political advocacy organizations (where allowed by law).

Beginning in 2009, Dow adopted enhanced oversight and greater transparency of U.S. corporate political spending by:

1) Posting publicly the Dow Code for Corporate Political Spending
2) Disclosing Dow’s corporate contributions made to candidates and party committees
3) Providing an annual review of corporate political spending to the EH&S Committee of Dow’s Board of Directors
4) Disclosing Dow’s contributions to trade associations and civic organizations used for political purposes

Aspect: Compliance

SO8 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations

Currently Dow systems do not classify whether a fine is related to products, the environment, or other focus of law. See note in EN28 for more information.

Other than the alternate pay amounts, the Company does not have non-monetary sanctions to report for 2009, nor is there awareness of a case or cases that should be disclosed as events brought through dispute resolution.

Additional information is also provided in Dow’s Form 10-K for the fiscal year ending December 31, 2009 – Part 1, Item 3 Legal Proceedings and Part II, Item 8, Note N – Commitments and Contingent Liabilities.

Aspect: Anti-Competitive Behavior

SO7 Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes

See Dow’s Form 10-K for the fiscal year ending December 31, 2009 – Part 1, Item 3 Legal Proceedings and Part II, Item 8, Note K – Commitments and Contingent Liabilities.

2015 Sustainability Goal – Energy Efficiency

Dow will reduce energy intensity 25 percent from 2005 to 2015.

As a world leader in chemistry, Dow is uniquely positioned to provide innovations that lead to alternative, less carbon intensive raw material sources and other solutions not yet imagined. Through new technology implementation and process improvements, we are constantly using energy more efficiently. Since 1994, Dow has saved $9.2 billion and 1,700 trillion BTUs due to improved energy intensity.
Product Stewardship
At Dow, each employee is responsible to make health, safety and environmental protection an integral part of his or her daily work. For this reason, we have implemented, throughout our global operations, a Product Stewardship Program based on the American Chemistry Council’s Responsible Care® initiative. Dow Product Stewardship guidelines cover all stages of a product’s life cycle and are closely monitored via Dow’s governance program through a combination of management system reviews, audits and self assessments to ensure continuous improvement.

These guidelines set strict goals for addressing the complicated challenges of research, development, manufacture, quality assurance, distribution and marketing of Dow products and services. The guidelines for distribution and marketing include:

• Determining which appropriate steps are to be taken to protect persons, property and the environment, while our products are being transported and stored.

• Selecting the proper containers for product distribution.

• Selecting carriers, warehouses and terminals to perform distribution functions consistent with Dow policies and Product Stewardship guidelines.

• Furnishing customers and distributors with appropriate information to promote the proper handling, use and disposal of our products.

• Informing customers and distributors about known use limitations and encouraging them to use our products in accordance with label recommendations and Safety Data Sheet Guidelines.

• Alerting Dow personnel immediately to problems of use that may involve human or environmental hazards and offering assistance in modifications of either products or use patterns, as required, to correct these problems.

See Product Stewardship Management Standards on dow.com for guidelines that cover manufacturing, quality assurance and research and development.

Our Goal Is Product Responsibility
Currently, three of our 2015 Sustainability Goals are aligned to Product Responsibility:

1. Product Safety Leadership Goal
As part of our 2015 Sustainability Goals, Dow has committed to make Product Safety Assessments (PSAs) publicly available for our products globally. In doing so, the Company will address relevant gaps in hazard and exposure information. We will continue to take appropriate action based on the assessments to protect human health and the environment throughout the product life cycle. The intent of the Product Safety Leadership Goal is to increase the public transparency of the processes and results of this work in order to increase public confidence. Summaries will be written in as non-technical language as possible and will cover topics such as basic hazards, risk and risk management. This product summary is intended to give general information about the chemical addressed. Additional information is available through the relevant Safety Data Sheet, which should be consulted before use of the chemical. We are working to provide Product Safety Assessments for all products by 2015. The PSA finder website is being visited by over a thousand users each month.

At the end of 2009, there were 231 PSAs posted at www.dowproductsafety.com. We have surpassed our 2009 goal to post 50 new PSAs to the website by adding a total of 80 to the site in 2009. Dow’s goal for 2010 is to post 110 new PSAs. The 2015 Goal is to have publicly available PSAs for all applicable Dow products. The estimated total number of PSAs to be completed by 2015 has increased to 850 as a result of product additions through the acquisition of Rohm and Haas in 2009. Employee development plans for those involved in creating PSAs help define and drive progress each year.

See Product Stewardship Management Standards on dow.com for guidelines that cover manufacturing, quality assurance and research and development.

2. Sustainable Chemistry Goal
We are now tracking Sustainable Chemistry measurements by business. This metric has become our “cradle-to-cradle” concept and it drives us to use resources more efficiently, minimize our footprint, provide value to our customers and stakeholders, deliver solutions for customer needs and enhance the quality of life for current and future generations.

We have set a goal to double the percentage or revenue that comes from products that have a sustainability advantage. The 2007 base-year assessment found that 5 percent of our products are qualified by this criterion. Often, significant capital spending will be involved in moving to new chemistries, taking some time before sales objectives are realized. In 2009, we had the percentage of revenue
Progress on our Sustainable Chemistry Goal for 2009 will be reported in our second quarter 2015 Goal Update in July 2010.

What You’ll Find in This Section
A detailed overview of our product responsibilities and obligations, including:

- The health, safety and improvement assessments of our products. PR1
- Incidents of non-compliance regarding our products’ health and safety performance. PR2
- The types of information required for our products and services. PR3
- Incidents of non-compliance regarding product labeling. PR4
- How we measure customer satisfaction. PR5
- How we market and advertise our products and services. PR6
- Incidents of non-compliance regarding our product advertising and marketing. PR7
- Complaints brought against us regarding breaches of customer privacy and data loss. PR8
- Fines paid as a result of non-compliance regarding product use laws and regulations. PR9

2015 Sustainability Goal – Sustainable Chemistry
Sustainable chemistry is our “cradle-to-cradle” concept that drives us to use resources more efficiently, to minimize our footprint, provide value to our customers and stakeholders, deliver solutions for customer needs and enhance the quality of life of current and future generations.

Some of the breakthroughs include bringing safe and clean water to huge populations that lack access, addressing climate challenges using carbon-capture technology, and making alternative energy a cost-effective reality through integrated photovoltaic building systems.

The most senior position with responsibility for Product Aspects is the vice president, Sustainability and EH&S, which is currently held by Neil Hawkins.
Aspect: Customer Health and Safety

PR1 Life cycle stages in which health and safety impacts of products and services are assessed for improvement and percentage of significant products and services categories subject to such procedures

All significant products are subject to and assessed for improvement opportunities as part of the Dow EH&S management approach described below.

<table>
<thead>
<tr>
<th>Product Stage</th>
<th>Percentage</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development of product concept</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>R &amp; D</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>Certification</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>Manufacturing</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>Marketing and promotion</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>Storage distribution and supply</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>Use and service</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>Disposal, reuse, or recycling</td>
<td>yes</td>
<td>no</td>
</tr>
</tbody>
</table>

Dow businesses use the Business Risk Review process to minimize possible adverse impacts on people, property and the environment as a result of Dow’s business activity, including minimizing EH&S impacts associated with new and existing operations, products, applications and services throughout their life cycle.

Businesses are to conduct risk reviews when new information is received, including changes in product uses, regulations, raw materials, etc., or when triggered by the passage of time (e.g., every 3 years). In the process, and through use of supporting processes and tools, health and safety impacts can be assessed through new product development, manufacture of product, transportation and distribution, use of product at customer facilities, through recycle, reuse or disposal. Risk mitigation measures are identified and implemented as a direct result of the Business Risk Review work process. Various Product Stewardship efforts such as distributor and customer qualifications and industry advocacy work are examples of involvement in the storage, distribution, supply and use steps of product life.

PR2 Total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle, by type of outcomes

This indicator requests the number of non-compliance events identified for products that are ready for use and therefore subject to regulations concerning health and safety. A review of Dow’s compliance tracking mechanism did not reveal a non-compliance incident during the 2009 period for a product ready for use, in use, or in disposal.

One of the ways in which Dow strives to protect human health and the environment throughout the life cycle of its products is through Responsible Care®. Dow’s commitment to this voluntary initiative has led to the implementation of Dow’s Responsible Care® Management System, which has been certified externally regarding adherence to the principles of Responsible Care®. For more information about health and safety management over the life cycle of products, see guiding principles at the Responsible Care® website.

Aspect: Product and Service Labeling

PR3 Type of product and service information required by procedures and percentage of significant products and services subject to such information requirements

The following information is provided for all significant products where subject to national laws or the OECD Guidelines.

<table>
<thead>
<tr>
<th>Information</th>
<th>Percentage</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sourcing of components</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>Content that might produce environmental impact</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>Safe use of product</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>Disposal of product and impacts</td>
<td>yes</td>
<td>no</td>
</tr>
</tbody>
</table>

Dow’s products must comply with hazard communication program requirements, including appropriate labeling and Material Safety Data Sheets, for all countries in which Dow sells them. The content of the label and safety data sheet is specified in local laws and regulations and includes such information as product composition, safe use recommendations, and appropriate disposal practices.
In addition, Dow provides direct customer support when additional handling or safety information is requested, including information that supports the use of product in critical applications (food contact, pharmaceuticals, biocidal applications, etc.) and for customs purposes. We provide technical data (physical properties, performance in application) and recommendations for safe handling and storage and give specific guidance regarding product uses that Dow supports.

Dow is in compliance with the REACH regulations promulgated by the European Union (EU), which will require complete information on the chemical properties, hazard profile, and uses of all products manufactured in or imported into the EU. Dow is also implementing activities required for compliance with the Globally Harmonized System for Classification and Labeling.

Dow's 2015 Sustainability Goal for Product Safety Leadership commits the Company to make product safety assessments (PSAs) publicly accessible for all saleable products globally and to address relevant gaps in information. More than 230 PSAs can be found at http://www.dow.com/productsafety/finder/.

PR4 Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes

Not reported by the Company at this time. Adjustments in label auditing will be involved to compile this information for reporting. Compliance reporting for PR4 is a long-term goal.

PR5 Practices related to customer satisfaction, including results of surveys measuring customer satisfaction

During 2009, the Customer Service organization redesigned the satisfaction metrics used to evaluate and improve the customer's experience in doing business with Dow. Key Performance Metrics are now visible to all employees and are updated each quarter to track our performance. The overall Ease of Doing Business is tracked through the use of four unique survey instruments that gain insights about customer experience with different aspects of doing business with Dow. During 2009, the Ease of Doing Business Performance Metric indicator of Customer Satisfaction was measured on a scale of 1 to 10 with a target of 7.75. Actual performance exceeded the quarterly target 63 percent of the time.

Aspect: Marketing Communications

PR6 Programs for adherence to laws, standards, and codes related to marketing communications, including advertising, promotion, and sponsorship

Marketing communications programs and materials are reviewed by Dow Legal and regulatory specialists to ensure that they are compliant with local laws and regulations as well as Dow's Ethics and Compliance policies. This includes product marketing information on the website, literature, news releases, trade shows, product packaging, etc.

PR7 Total number of incidents of non-compliance with regulations and codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes

No incidents of non-compliance concerning marketing communications were identified for the reporting period.

Aspect: Customer Privacy

PR8 Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data

We have internal controls to prevent the release of customer information. To the best of our knowledge, there are no customer privacy complaints.
Aspect: Compliance

PR9 Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services

Currently Dow systems do not classify whether a fine is related to products, the environment, or other focus of law. See note in EN28 for more information.

We are unaware of any significant fines resulting from our products in use in 2009.

Additional information is also provided in Dow’s Form 10-K for the fiscal year ending December 31, 2009 – Part 1, Item 3 Legal Proceedings and Part II, Item 8, Note N – Commitments and Contingent Liabilities.
Appendix

CEO Water Mandate
Index of our GRI Report aligned to the elements of CEO Water Mandate.

For an overview of Dow’s global water initiatives, please see the Interactive Water Map.

Overview of Dow’s Participation in the Mandate
4.12 Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses
S05 Public policy positions and participation in public policy development and lobbying

Direct Operations
EN7 Initiatives to reduce indirect energy consumption and reductions achieved
EN8 Total water withdrawal
EN9 Water sources significantly affected
EN10 Percentage and total volume of water recycled and reused
EN21 Water discharge

Supply Chain and Watershed Management
EC8 Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement

Note: Dow currently does not have specific programs for supply chain water management. Dow collaborates with communities, customers, and suppliers to address specific and unique local needs.

Collective Action
4.17 Key topics and concerns raised through stakeholder engagement, and how the organization has responded to those key topics and concerns
EC8 Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement
EN14 Strategies, current actions, and future plans for managing impacts on biodiversity

Public Policy
S05 Public policy positions and participation in public policy development and lobbying

Community Engagement
S01 Nature, scope, and effectiveness of managing impact on communities

Transparency
Index for GRI Report in G3 format covering 2009
3.13 Policy regarding external assurance for the report
EN7 Initiatives to reduce indirect energy consumption and reductions achieved
<table>
<thead>
<tr>
<th>Profile</th>
<th>Description</th>
<th>Page No.</th>
<th>Reporting Level</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>Statement from CEO presenting overall vision</td>
<td>11-12</td>
<td>Reported</td>
<td></td>
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<tr>
<td>1.2</td>
<td>Key impacts, risks, and opportunities</td>
<td>13-14</td>
<td>Reported</td>
<td></td>
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<td>2.1</td>
<td>Name of reporting organization</td>
<td>14</td>
<td>Reported</td>
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<tr>
<td>2.2</td>
<td>Primary brands, products, and/or services</td>
<td>14</td>
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<td>2.3</td>
<td>Operational structure of the organization</td>
<td>15</td>
<td>Reported</td>
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<td>2.4</td>
<td>Location of organization’s headquarters</td>
<td>15</td>
<td>Reported</td>
<td></td>
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<tr>
<td>2.5</td>
<td>Countries of operation</td>
<td>15</td>
<td>Reported</td>
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<tr>
<td>2.6</td>
<td>Nature of ownership and legal form</td>
<td>15</td>
<td>Reported</td>
<td></td>
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<tr>
<td>2.7</td>
<td>Markets served</td>
<td>15</td>
<td>Reported</td>
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<tr>
<td>2.8</td>
<td>Scale of the reporting organization</td>
<td>16</td>
<td>Reported</td>
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<td>2.9</td>
<td>Significant changes during the reporting period</td>
<td>16-17</td>
<td>Reported</td>
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<td>2.10</td>
<td>Awards received during 2009</td>
<td>17</td>
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<td>Reporting period</td>
<td>17</td>
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<td></td>
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<tr>
<td>3.2</td>
<td>Date of most recent previous report</td>
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<td>Reported</td>
<td></td>
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<tr>
<td>3.3</td>
<td>Reporting cycle</td>
<td>17</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>3.4</td>
<td>Contact point for questions regarding the report</td>
<td>17</td>
<td>Reported</td>
<td></td>
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<tr>
<td>3.5</td>
<td>Process for defining report content</td>
<td>17-18</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>3.6</td>
<td>Boundary of the report</td>
<td>18-19</td>
<td>Reported</td>
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<td>3.7</td>
<td>Limitations on the scope or boundary of the report</td>
<td>19</td>
<td>Reported</td>
<td></td>
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<td>3.8</td>
<td>Basis for reporting that can significantly affect comparability</td>
<td>19</td>
<td>Reported</td>
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<tr>
<td>3.9</td>
<td>Data measurement techniques and the bases of calculations</td>
<td>20</td>
<td>Reported</td>
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<tr>
<td>3.10</td>
<td>Explanation of any re-statements of information provided in earlier reports</td>
<td>20</td>
<td>Reported</td>
<td></td>
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<tr>
<td>3.11</td>
<td>Significant changes from previous reporting</td>
<td>20</td>
<td>Reported</td>
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<td>3.12</td>
<td>Table identifying location of Standard Disclosures</td>
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<td>3.13</td>
<td>Policy and practice regarding external assurance for the report</td>
<td>20</td>
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<td>Assurance for the report has been provided by ERM</td>
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<tr>
<td>4.1</td>
<td>Governance structure of the organization</td>
<td>23</td>
<td>Reported</td>
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<td>4.2</td>
<td>Is the Chair of the Board of Directors also an executive officer?</td>
<td>23</td>
<td>Reported</td>
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<td>4.3</td>
<td>Members of the Board of Directors that are independent and/or non-executive members</td>
<td>23</td>
<td>Reported</td>
<td></td>
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<tr>
<td>4.4</td>
<td>Mechanisms to provide recommendations or direction to the highest governance body</td>
<td>23-24</td>
<td>Reported</td>
<td></td>
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<tr>
<td>Section</td>
<td>Description</td>
<td>Page(s)</td>
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<td>---------</td>
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<td>4.5</td>
<td>Linkage between compensation and the organization’s performance</td>
<td>24</td>
<td>Reported</td>
<td></td>
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<tr>
<td>4.6</td>
<td>Processes to ensure conflicts of interest are avoided</td>
<td>24</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>4.7</td>
<td>Process for determining the qualifications and expertise of the Board members</td>
<td>25</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>4.8</td>
<td>Statements of mission or values, codes of conduct, and principles</td>
<td>25</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>4.9</td>
<td>Procedures for overseeing economic, environmental, and social performance</td>
<td>25-26</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>4.10</td>
<td>Processes for evaluating the highest governance body’s performance</td>
<td>26</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>4.11</td>
<td>How the precautionary approach is addressed</td>
<td>26</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>4.12</td>
<td>Externally developed economic, environmental, and social charters to which the organization subscribes or endorses</td>
<td>26-28</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>4.13</td>
<td>Memberships in associations and/or advocacy organizations</td>
<td>28-29</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>4.14</td>
<td>List of stakeholder groups engaged by the organization</td>
<td>29</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>4.15</td>
<td>Basis for identification and selection of stakeholders</td>
<td>29</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>4.16</td>
<td>Approaches to stakeholder engagement</td>
<td>29-31</td>
<td>Reported</td>
<td></td>
</tr>
<tr>
<td>4.17</td>
<td>Key topics and concerns raised through stakeholder engagement</td>
<td>31</td>
<td>Reported</td>
<td></td>
</tr>
</tbody>
</table>
## The Economic Impact of Sustainability
### Economic Disclosure on Management Approach

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<td>Defining/reporting indirect economic impacts from all significant sites is not attempted. A mid-term reporting goal.</td>
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## Taking Responsibility for Our Impact on the Environment
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<td>EN14</td>
<td>Strategies/plans related to biodiversity</td>
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<td>Unaware of any examples of or potential for negative impact on Red List species.</td>
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## Good Place to Work
### Labor Practice Disclosure on Management Approach

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## Human Rights
### Human Rights Disclosure on Management Approach

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## Society Disclosure on Management Approach

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## Product Stewardship

## Product Responsibility Disclosure on Management Approach

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