

Code of Business Conduct for Suppliers



Seek **Together**™

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

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Introduction



As the Chief Procurement Officer at Dow, I am committed to Dow's ambition to be the most innovative, customer-centric, inclusive, and sustainable materials science company. Urgent global challenges like human rights abuses and climate change or water pollution are not distant problems; they are a shared responsibility that requires active engagement from us all. I personally sit on the steering committee of Together for

Sustainability to build collaborations with over 40 other chemical companies to reduce negative environmental and social impacts in our value chains.

We all have a pivotal role to play in tackling these pressing issues head-on, and I invite Dow's suppliers to join us as partners on this journey. Dow's Code of Business Conduct for Suppliers (henceforth, the "Supplier Code") outlines our expectations for our vendors around environmental stewardship, social responsibility,

and corporate governance based on the principles of the United Nations Global Compact.

The best practices provided in this Supplier Code are recommended for all suppliers to follow. Compliance with the mandatory principles, however, is a fundamental condition for any collaboration with Dow. Not following these principles may result in different actions being adopted by Dow, including termination of our business relationship.

Thank you for being an integral part of Dow's commitment to responsible procurement, especially to environmental and social sustainability. Your role in Dow's supply chain is critical, and we believe that by working together, we can achieve remarkable milestones in creating a more sustainable, equitable, and prosperous future for all.

Cathy Budd

*CPO, Vice President, Purchasing
Dow, Inc*

2025 Sustainability Goals

10-year goals launched in 2015

Measuring our progress

To advance our sustainability journey, we have set measurable and ambitious goals and targets.



Leading the Blueprint



Delivering Breakthrough Innovations



Advancing a Circular Economy



Valuing Nature



Safe Materials for a Sustainable Planet



Engaging for Impact: Communities, Employees, Customers



World-Leading Operations Performance

Accelerating our progress

In 2020, we introduced new targets aimed at reducing carbon emissions and plastic waste.

Protect the climate

Accelerating our work with our suppliers, customers and value chain partners to ensure Dow's ecosystem is carbon neutral by 2050.

Transform the waste

Building industrial ecosystems to collect, reuse or recycle plastic waste and address waste management gaps.

Close the loop

Helping our customers design for recyclability and increasing our use of feedstocks from recycled and renewable sources.

Accountability and compliance



Mandatory and best practices principles

The Supplier Code consists of two types of guidelines: mandatory principles that must be followed for any partnership with Dow and best practices that serve as a guiding direction for suppliers. It's important to note that while best practices are currently optional recommendations, they could become mandatory in the future. However, it is crucial to adhere to the mandatory principles; if these mandatory principles are not followed, it may result in the termination of the business relationship.

If a supplier is aware of any inability to meet the mandatory requirements of the Supplier Code within a reasonable timeframe, they should promptly notify Dow. Dow strongly encourages suppliers to thoroughly evaluate their existing policies, procedures, and practices in comparison to the mandatory requirements to prevent any potential violations. If you have any questions or encounter difficulties in meeting the policy's requirements, please reach out to your designated contact person at Dow for clarification or assistance.

Dow reserves the right to modify, revise, or amend the Supplier Code at its sole discretion, at any given time. Please take note of the date of this document.



The application of this Supplier Code in any country or jurisdiction shall conform to all applicable laws, directives, or regulations. In instances where the principles herein surpass legal requirements, suppliers are required to adhere to the Supplier Code wherever legally permissible.



Suppliers must extend these principles, or equivalent ones, to their subcontractors and suppliers.

Suppliers are required to conduct risk assessments of their supply chain and provide Dow with visibility on risks and strategies for mitigation.



Dow requires its suppliers to establish strong systems and controls to ensure compliance with applicable laws and the principles outlined in this Supplier Code.

Suppliers should maintain comprehensive documentation to demonstrate adherence to these principles through internal records and public platforms.



Dow reserves the right to assess, monitor, and audit suppliers. Dow may engage organizations like Together for Sustainability (TfS) to evaluate compliance.

Dow anticipates suppliers' cooperation with such assessments when required, including promptly implementing corrective actions when necessary.



Dow encourages its suppliers to educate their employees on the principles of this Supplier Code and how to report any suspected breaches.



Suppliers not in compliance may be terminated and/or precluded from consideration of future business.

Environment



Dow is accelerating its action to protect people and the planet based on the life cycle of its products: their sources of energy and feedstocks, manufacturing processes, uses and applications, and how they are treated after use. Dow strives to use its technology, expertise, and partnerships to help conserve our climate, water, and natural ecosystems. Dow is committed to become carbon neutral by 2050 across scope 1, 2 and 3 carbon emissions. Greenhouse gas emissions from purchased goods, services, and logistics activities make up over 50% of Dow's scope 3 carbon emissions, making Dow's suppliers' actions critical in reaching global climate goals.

Dow expects its suppliers to adhere to the following core principles related to the environment.



Promote environmental responsibility

One of Dow's core values is to protect people and the planet. Beyond complying with all applicable legal requirements for environmental protection, Dow seeks to minimize its impact on nature, water, and the climate, and promote the efficient use of raw materials, energy, and water. Suppliers should proactively adopt similar principles to promote greater environmental responsibility.

Mandatory

Suppliers will ensure that activities within their own operations do not cause harm or adverse effects to the environment. Suppliers will establish and implement a policy (or policies) to ensure the environment is protected throughout their operations.

Suppliers will ensure that their products and operations meet applicable government or international standards, whichever are more stringent.

Suppliers will have systems in place to ensure safe handling, collecting, storage and disposal of waste, air emissions, and wastewater discharges. Suppliers shall not produce, use, or dispose of mercury or chemicals with Persistent Organic Pollutants (POPs) in violation of the provisions of the Minamata and Stockholm Conventions.

Suppliers shall adopt practices protect or promote natural habitats and biodiversity. No deforestation or illegal logging is tolerated.

Best practice

Dow will prioritize suppliers that adopt circular business models, seeking ways to minimize the use of nonrenewable resources and use natural resources more efficiently.

Effective waste reduction, collection and recycling systems and strategies are in place.

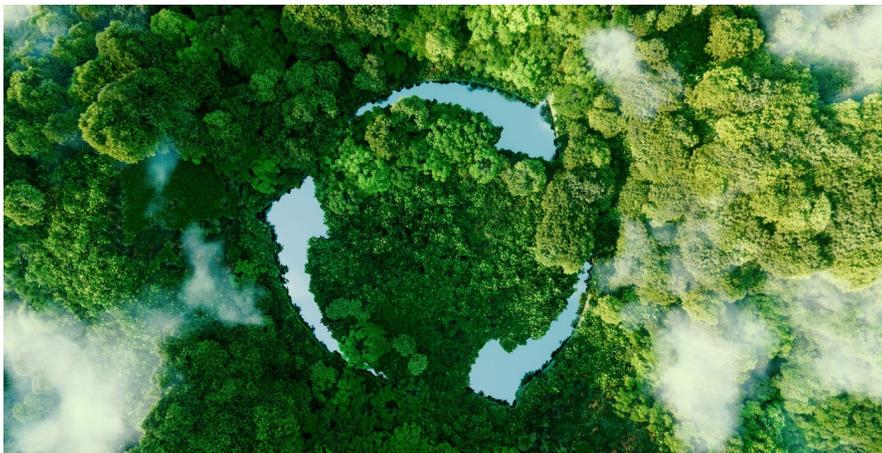
Environment



Identify key issues and set targets for continuous improvement

Dow has pinpointed specific areas where it believes its actions can have the most significant positive environmental impact, and has set strategies and targets around climate protection, the promotion of a circular economy, and the use of safer materials. Dow urges its suppliers to assess their unique environmental risks and opportunities in their operations and value chain and set targets to improve in the near and long term.

Dow's progress toward its environmental targets is constantly monitored using widely accepted metrics and disclosed via common reporting platforms like CDP, Ecovadis and Dow's annual Intersections report. Dow expects its suppliers will adopt a similar commitment to tracking and reporting their performance.



Mandatory

Supplier will take actions to track and continuously improve their environmental performance across all operations, products, and services.

Suppliers will set near and long-term goals to address relevant issues related to climate, nature, water, energy use, and circularity in their operations and value chain.

Upon request, suppliers will share environmental data, such as carbon, nature, water, or energy metrics, to support Dow in tracking and reaching its targets. This includes conducting an annual greenhouse gas inventory across scope 1, 2 and 3, as well as calculating key metrics like product carbon footprints, water use, and renewable energy uptake.

Suppliers will quantify and report environmental metrics following established methodologies like the Greenhouse Gas Protocol, Global Logistics Emissions Council Framework, and World Business Council for Sustainable Development Pathfinder Framework.

Best practice

All suppliers should set a public climate target to achieve carbon neutrality across scopes 1, 2 and 3 greenhouse gas emissions by 2050.

Dow recommends that suppliers publicly disclose environmental goals and strategies using widely-accepted methods and metrics and reporting via platforms like CDP and Ecovadis.

Suppliers should collaborate with their value chains directly with suppliers and through active involvement in industry groups dedicated to advancing collective efforts for reducing greenhouse gas emissions, preserving biodiversity, protecting watersheds, and other issues based on risk and relevance.



Proactively manage environmental risks

A risk-based approach should be taken to determine the environmental issues that present the greatest potential for an adverse impact based on supplier's size, type, and business profile. At Dow, risks are identified using an integrated enterprise approach. Each key risk is assigned to a member of the leadership team and, if needed, to internal subject matter experts who are accountable for a mitigation plan. Suppliers should follow a similar approach to identifying and managing risks.

Mandatory

Suppliers will proactively identify and measure environmental risks and impacts within their production, distribution, and transportation processes.

Suppliers will put environmental management policies, procedures, and accountability measures in place for issues that present significant environmental risks. A mitigation hierarchy (avoid, minimize, restore and offset) will be adopted if a supplier is operating near critical biodiversity areas.

Logistics and external manufacturing suppliers will adopt pellet loss reduction programs such as Operation Clean Sweep.

Best practice

Suppliers should join collaborative efforts to identify and address environmental risks across value chains, such as using shared assessments like Ecovadis or CDP.

Suppliers should use risk assessment tools defined by leading programs.

Adopt environmentally friendly technologies and systems

Dow has a multi-generational plan to replace end-of-life emissions-intensive assets with higher-efficiency, lower-emissions assets. Innovating, implementing, and scaling new technologies and systems to reduce environmental impacts, accelerate the clean energy transition, and advance the circular economy is a core part of sustainable development. Dow expects its suppliers to support global efforts towards efficient and clean technologies leading to increased efficiency.

Mandatory

Suppliers will develop, adopt and promote environmentally-friendly technologies, such as cleaner production processes, pollution prevention measures, and renewable energy sources.

Suppliers should develop products and processes that prioritize the efficient use of natural resources and energy while minimizing waste and emissions.

Best practice

Dow encourages suppliers to enact a company policy on the use of environmentally friendly technologies and to participate in collaborations to co-develop innovative technology and systems solutions.

Social



At Dow, Respect for People is a fundamental value. Dow urges its suppliers to uphold the highest standards when it comes to respecting the human rights of their employees and treating them equitably, all in alignment with applicable laws. Dow's values and this Supplier Code are influenced by and reflect the fundamental principles described in the United Nations Universal Declaration of Human Rights. Dow committed in May 2007 to the UN Global Compact and its Ten Principles. Further, we operate in full accordance with the UN Guiding Principles on Businesses and Human Rights. These Guiding Principles provide a framework for governments and companies that are committed to protecting human rights around the world. We respect the sovereignty of governments around the world and the responsibility of governments to protect the human rights of their citizens. Together, we can create a world where respect for human dignity is at the forefront of business practices.

Respect freedom of association and collective bargaining

Mandatory

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

Suppliers will not restrict employee rights or intimidate employees with the use of force by security personnel.

No forced and compulsory labor

Mandatory

Suppliers are prohibited from utilizing any form of forced or involuntary labor, such as prison labor, servitude, indentured labor, bonded labor, slave labor, or human trafficking.

Suppliers will conduct business mapping to proactively identify the absence of forced labor within their supply chain.

Suppliers will complete training provided by Dow about our social compliance program requirements if requested to do so.

No child labor

Mandatory

Suppliers will adhere to all relevant child labor laws and must guarantee that they do not hire, or procure goods or services produced by, individuals below the legally mandated minimum working age in their respective localities.

Do not discriminate

Mandatory

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



Prevent harassment and abuse of labor

Mandatory

Suppliers will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment, bullying, or any other form of abuse and will comply with all applicable laws on harassment and abuse of employees.

Reports of harassment, bullying, and/or abuse will be treated seriously and respectfully. Employees reporting non-compliance to these aspects should not suffer retaliation and be provided with transparent, fair and confidential procedures that result in swift, unbiased and fair resolution of difficulties which may arise as part of the process.

Adhere to minimum wage requirements

Mandatory

Suppliers will respect at minimum the minimum wage requirements in the respective country.

Advance supplier diversity

Best practice

Suppliers should foster and practice a culture of inclusion and work to improve the overall diversity of their workforce.

Suppliers are encouraged to have an active supplier diversity program and support the businesses and communities where Dow operates by engaging with minority- and woman-owned businesses and other diverse categories. Dow strongly recommends establishing systems for tracking diverse spend and reporting this information to Dow.

Responsible sourcing of conflict minerals

Mandatory

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

Suppliers will not source Conflict Minerals from the Democratic Republic of the Congo or the adjoining countries (the “Covered Countries”) in a manner which directly or indirectly finances or benefits armed groups in the Covered Countries.

Suppliers will source Conflict Minerals from smelters that have been validated as conformant with the Responsible Minerals Assurance Process standards of the Responsible Minerals Initiative or an equivalent cross-recognized assessment.

Suppliers will abide by all applicable laws and regulations related to Conflict Minerals and agrees to provide all necessary information requested by Dow to enable Dow to complete its reasonable country of origin inquiries and due diligence with respect to Conflict Minerals.

Provide a healthy and safe workplace

Mandatory

Suppliers will comply with all applicable workplace health and safety laws. Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, work procedures, protection from exposure to hazardous materials and appropriate personal protective equipment.

Supplier’s employees must have access to clean, safe, and reasonable working conditions. Their facilities (including operations and dormitories) must be clean, healthy and safe, with adequate access to potable drinking water, sanitary facilities, fresh air, and lighting.

Suppliers will provide training on work process safety as well as emergency response procedures.

Protect communities during production and transportation

Mandatory

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

Suppliers will not import or export hazardous waste in violation of the Basel Convention.

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

Respect ownership of lands, forest and waters and protect livelihood of persons

Mandatory

Suppliers will respect ownership of lands, forests, and waters and prohibit unlawful development or other use to protect the livelihood of persons.



Governance



Dow expects its Suppliers to conduct their business as Dow strives to conduct its business: ethically and in compliance with the law. We expect Suppliers to have relevant ethics and governance policies and systems to achieve the highest standards. Any potential violations of the Supplier Code can be reported without fear of retaliation through Dow's Ethics Line.

As a Dow supplier, you are part of our supply chain and we count on your commitment to embrace the standards in this Supplier Code.

Increase awareness

Mandatory

Suppliers must provide employees with training on business ethics, especially in the context of their specific jobs (e.g fraud, bribery & corruption, conflict of interest).

Suppliers will raise awareness of the Supplier Code among their Employees.

Best practice

Dow's expectation is Suppliers to have a Code of Conduct and appropriate, written policies addressing ethics, compliance and other applicable governance matters.



Avoid conflicts of interest

Mandatory

Suppliers will actively engage with its employees involved in the business relationship with Dow to identify any situation that could be deemed as conflict of interest, whether real or apparent. Supplier must disclose any findings to Dow.

Suppliers must acknowledge that no business entertainment, gift nor hospitality is a requirement for any company to do business with Dow. Any business entertaining, gift or hospitality offered by suppliers to Dow at supplier's sole discretion must be kept reasonable in nature and value and must be provided entirely for the purpose of maintaining good business relations. In no event supplier must provide Dow with any business entertainment, gift or hospitality that is intended to influence Dow's business decisions. Suppliers will respect that Dow employees do not give or accept any gift, entertainment, or favor that could compromise or raise doubts about the neutrality of the decisions made by Dow.

No bribery or corruption

Mandatory

Suppliers will not engage in any form of commercial bribery, corruption, extortion, kickback nor fraud. Supplier must neither promise nor offer any incentive or gifts to any Dow employee or Dow employee's family or friends in order to obtain or retain Dow business.

Suppliers will comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and all other local or otherwise applicable laws related to the bribery of government officials. Suppliers must maintain adequate procedures to prevent unlawful behavior in all commercial dealings undertaken by the supplier.

Governance

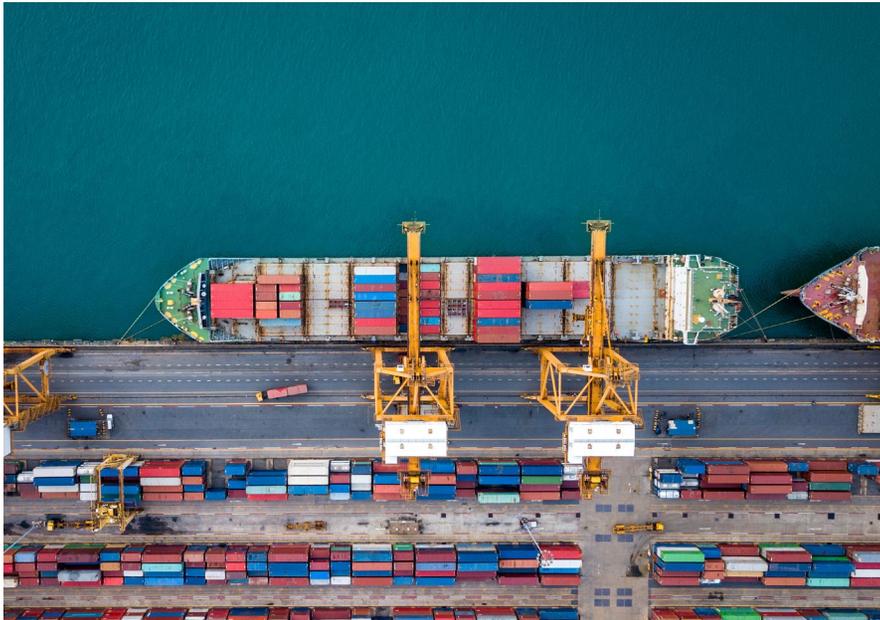


Comply with fair competition and accurate accounting

Mandatory

Suppliers will comply with all applicable laws regarding fair competition and antitrust. Supplier must not engage in any form of money laundering or knowingly accept funds acquired through illicit means. No confidential information in the supplier's possession regarding Dow shall be used to engage in or support insider trading.

All business and commercial dealings shall be transparently performed and accurately recorded in the supplier's books and records. Suppliers will keep – and provide to Dow upon request – exact records related to fair competition and accurate accounting of all matters related to the supplier's business with Dow.



Protect information

Mandatory

Suppliers must respect intellectual property rights; protect confidential information; comply with security standards, policies, and controls; and comply with privacy rules and regulations.

Intellectual property: Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and Dow information is to be safeguarded. Any confidential information and/or licensed intellectual property shall be used only for the intended and designated purpose and in accordance with applicable laws and the Supplier agreement. Suppliers must take all due care in handling, discussing, and transmitting sensitive and confidential information.

Security: Suppliers must maintain a security program in accordance with industry standards, applicable laws, and the Supplier agreement. Suppliers must report any potential incident that involves Dow data (whether internally or through a partner or supplier) as soon as possible.

Privacy: At Dow, we value, protect, and defend privacy. Suppliers must comply with all local privacy and data protection laws, have appropriate processes and practices to secure and protect personal data, use personal data only as permitted by the Supplier agreement or otherwise agreed to by Dow representatives, and cooperate with Dow compliance efforts.

Retention of corporate records and internal business information: Supplier must maintain all business records created, managed, or used on Dow premises or with Dow equipment/tools in compliance with applicable laws, the Supplier agreement, and other Dow-directed practices. Unless otherwise specified, Dow will retain all rights of ownership and control of all information created, managed, or used outside of Dow premises and/or Dow equipment/tools as described in the contract with Dow. Supplier may be required to retain, pull, or otherwise provide data to Dow for a prescribed period as established in the contract or potentially longer in the case of a legal or audit matter.

Respect international trade and sanctioned parties

Mandatory

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

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

Advance supply chain traceability

Mandatory

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

Best practice

Suppliers will actively engage and manage their supply chain for risk to increase transparency and traceability therein, which includes mapping supply chains back to their origin. Suppliers can further advance traceability by engaging in collaborations with industry groups, NGOs, and other stakeholders.

Report misconduct and anti-retaliation

Mandatory

Suppliers must promote a corporate culture of reporting misconducts within its respective organization. Such promotion should be achieved by clearly informing employees on how to report misconduct, its benefits and the protections offered to the whistleblowers.

Suppliers must protect employees who report misconducts in good faith from any retaliatory practices.

Suppliers must report to Dow (a) any potential violation of this Supplier Code and/or (b) any genuine suspicion that a Dow employee or anyone acting on Dow's behalf has engaged in illegal or otherwise improper conduct with respect to their business. Any reports to Dow must be made through Dow EthicsLine.

<https://secure.ethicspoint.com/domain/media/en/gui/23573/index.html>.

Suppliers must ensure all its employees involved in any aspects of the relationship with Dow are aware on how to report misconducts to Dow.





Seek Together™

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