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Unquestionable Integrity

At Dow, we are passionate about chemistry. We believe in the potential of chemistry to change the face of humanity for the better. The great promise of our industry is to deliver solutions that will make the world a better place—directly through our products, and indirectly by our conduct, by providing jobs, and by fueling the economy and improving the standard of living.

We are fiercely focused on these goals. And we are equally focused on “how” we accomplish them. Our Values of Integrity, Respect for People and Protecting Our Planet are evident in our corporate culture and connect each of us around the world.

The Diamond Standard, Dow's Code of Business Conduct, puts a framework around these Values that is multifaceted and clear, setting expectations and guiding our behavior. Our intent, of course, is to enable ethical, lawful decision-making and to create an environment of respect, but that's not all. We believe it is also our responsibility as a corporate citizen to extend these Values well beyond our Company walls.

As a signatory to the United Nations Global Compact, we are committed to promoting socially responsible conduct that aligns with 10 universally accepted principles, including those related to human rights, labor, the environment and the fight against corruption. These principles are woven throughout the Code and are also consistent with our expectations of suppliers and business partners.

At Dow, we embrace opportunities in the global marketplace by applying innovative chemistry, but we are more than a solutions provider. We are a thought leader, a source of economic growth and a company with unquestionable integrity. Our long-term sustainability depends on it, and our Board of Directors, our customers and our communities expect nothing less.

Thank you in advance for reviewing and internalizing The Diamond Standard, our Code of Business Conduct.
For more than a century, we have built trust with our employees, customers, shareholders and communities as a company committed to the highest ethical standards.

Our Company has transformed itself several times during this long history, but a common denominator across many generations of Dow employees has been a focus on Integrity, Respect for People and Protecting our Planet. These Values set the foundation for everything we do. They drive us to conduct business fairly and with an appropriate sense of responsibility to each other and the broader community.

As the global economy expands and the business environment increases in complexity, the Code of Business Conduct provides a framework to make good choices: to abide by the law and be highly principled and socially responsible in all of our business practices.

The Code applies to all Dow employees and our subsidiaries, as well as joint ventures that adopt the Code. Throughout this document, references to Dow or the Company apply to all of these entities.

Everyone’s Responsibility

During the course of normal business, we will be faced with situations where the right answer may not be obvious. The Code can guide us, but it cannot address every circumstance. Our responsibility in all instances is to avoid even the appearance of improper behavior. We must abide by all applicable laws, live our Values and, as always, when in doubt, seek counsel.

Responsibilities of Supervisors and Leaders

Actions speak louder than words, and we hold our leaders to a higher standard. Supervisors are expected to model appropriate behavior, ensure that employees have the resources they need to conduct business ethically, encourage discussion and be responsive to any concerns.

Speak Up

We measure commitment to our Values by how we treat each other. As employees, we have an obligation to behave in a way that protects our business interests, our reputation and each other. This includes taking action to promptly report any conduct inconsistent with the Code, our Values or the law—even if the facts of the situation are not entirely clear. All reports of misconduct are taken seriously and will be treated confidentially, consistent with a full and fair inquiry.

Questions or concerns about proper conduct may be addressed with:

- Supervisor
- Human Resources Representative
- Regional Ethics & Compliance Committee member*
- Legal Department Attorney
- Office of Ethics and Compliance*
- Dow EthicsLine*

No Retaliation

We respect those who raise concerns about improper conduct, and we will not tolerate retaliation against anyone who reports a potential violation in good faith.

Dow Keyword: Ethics

*See Administration of the Code
The Code, the Law and Company Policy

Dow has detailed policies in many areas covered by the Code, and has adopted various industry and external best practices. As a global company, we must follow the laws of many countries and jurisdictions. If a section of the Code conflicts with applicable local law, then the law takes precedence.

Please consult a Legal Department Attorney or the Office of Ethics and Compliance if you have any questions about local laws, the Code and other Company policies.
Disrespectful or hostile behavior degrades people and creates disruptions that can harm productivity and performance.

Diversity, Equal Opportunity and Respect in the Workplace

When we respect the diversity of our workplace, we create an inclusive environment where everyone can perform to their highest potential.

- We provide equal employment opportunities to all employees and applicants regardless of age, race, color, national origin, sexual orientation, gender, gender identity, disability, religion or any other factor protected by law.
- Hiring, promotion, compensation and other employment-related decisions are based only on job-related factors.
- We strive to create an environment of mutual respect, free from harassment and unprofessional behavior. Our Respect and Responsibility Policy demonstrates our commitment to preventing all inappropriate behavior in the workplace.
  - Sexual harassment is a particularly harmful form of inappropriate conduct. It can include unwelcome flirtations or sexual advances, requests for sexual favors, unsolicited physical contact, and offensive verbal, visual or physical conduct of a sexual nature. It can also include inappropriate pictures, posters, screen savers, videos or e-mail messages.
  - Bullying and mobbing are unacceptable. This includes any aggressive, intimidating or violent behavior that may create a hostile work environment.
- Avoid conduct and statements that are degrading, offensive, humiliating or intimidating to others. Seemingly innocent actions can create an environment that may be offensive, and we should be alert to our own behavior and the effect it may have on others.

**Dow Keyword: Respect and Responsibility**
We all have a responsibility to work free from the influence of alcohol or other substances that could affect our judgment or safety on the job.

Be aware of erratic, abusive or hostile behavior and report concerns.

Labor Policy

Respect for human rights and dignity is a cornerstone of our business.

- We recognize and respect all labor and employment laws—including those respecting freedom of association, privacy and equal employment opportunity—wherever we operate.
- We believe that working positively and directly with employees best serves their interests.
- We strive to work cooperatively with duly chosen employee representatives in the common pursuit of the interests of the employees and the Company’s mission.
- We do not use forced or involuntary labor.
- We comply with all applicable child labor laws.

Health and Safety in the Workplace

We maintain a safe and healthy work environment and are committed to eliminating work-related injuries and illnesses.

- Employees and the Company share the responsibility to make safety and health a daily priority.
- We support each other in actions to live safely and in good health by utilizing available resources and observing recommended practices.
- We are accountable to take corrective action when an unsafe or hazardous situation is brought to our attention.

Dow Keyword: EH&S

Substance Abuse in the Workplace

Dow is committed to the safety, health and security of employees, our operations and all those who come into contact with them. We will not tolerate substance abuse in the workplace.

Employees are expected to work free from the influence of any substance that could affect judgment or safety on the job.

- We do not permit the use, possession or sale of drugs, controlled substances or drug paraphernalia on Dow premises, in Dow vehicles or while conducting Dow business.
- We do not permit the use or possession of alcohol in Dow vehicles or on Dow premises, except for certain on-site social events where permission has been given in advance.

Dow also reserves the right to conduct drug and alcohol testing as permitted by local law.

Dow Keyword: ES&S

Violence in the Workplace

Dow will not tolerate acts of violence, including verbal or physical threats, intimidation, harassment and coercion.

- Weapons, firearms, ammunition, explosives and incendiary devices are prohibited on Company property. In some locations, the law provides limited exceptions to the prohibition of firearms on Company property.
- Immediately report to a supervisor or Security any behavior that has the potential to become violent or that threatens the safety of people or property.
- For more detailed information regarding the rules for your location, please see the links to the ES&S Area/Region websites.

Dow Keyword: ES&S

Dow reserves the right to search any item on Company property, including offices, desks, computers, purses, briefcases, automobiles, packages and lockers, at any time, as permitted by local law.

www.dowethicsline.com
Conflicts of Interest

We are expected to avoid situations where personal interests conflict, or appear to conflict, with those of the Company. This includes any activity that may cause others to doubt our fairness or interferes with our ability to perform our job objectively.

If there is a chance that a situation might be perceived as a conflict of interest, we must disclose it to a supervisor, HR or the Office of Ethics and Compliance and take steps to get it resolved.

Common conflict of interest situations include:

- Having a financial interest in a company that does business with Dow.
- Receiving compensation or other incentives from a company that does business with Dow.
- Holding a second job that interferes with our ability to do our Dow job.
- Hiring a supplier, distributor or other agent managed or owned by a relative or close friend.
- Engaging in a romantic relationship with a person you report to, or who reports to you.

Conflicts of interest can take many forms. The Code can’t address every potential conflict of interest situation, so we must use good judgment and seek guidance when unsure.

Business

Dow is respected as an innovator of science, a supplier of choice and a formidable competitor. Through financial integrity and strong governance, we have successfully established credibility in the marketplace as a top-tier investment.
Outside Interests
As employees, we should avoid investments or other financial interests that could interfere, or appear to interfere, with our ability to make decisions in the best interest of the Company.

We must not:
• Hold a financial interest in any Dow customer, supplier, distributor or agent if we are in a position to affect Dow’s business relationship with them.
• Take any opportunity for business or profit that belongs to Dow, or compete with the Company in any way.

The annual Conflict of Interest Questionnaire asks each of us to declare any personal circumstances that may create a conflict of interest. It is important that we respond fully and honestly to the questionnaire as well as promptly notify our supervisor or the Office of Ethics and Compliance if a situation exists.

Outside Employment
In general, we may work outside of Dow in any lawful occupation as long as these other duties are performed outside of normal working hours and do not interfere with our ability to perform our Dow job.

We must not:
• Be employed by, or receive any compensation from, a Dow customer, supplier, distributor or agent if we are in a position to affect Dow’s business with them.
• Be employed by, or receive any compensation from, any competitor of Dow.
• Serve as an officer or director of any for-profit company outside of Dow without first seeking approval from our supervisor or the Office of Ethics and Compliance. Approval is not necessary for service in a family-owned business or a non-profit or charitable organization, unless the business or organization is a Dow customer, supplier, distributor, agent or competitor.

Speaking at Conferences
If we are invited to speak at a conference because we are a Dow employee or because of our expertise arising from our Dow job responsibilities, we cannot accept compensation. However, in such a situation, the Company can accept reimbursement for reasonable expenses.

Relatives, Friends and Personal Relationships
Many of us have relatives or friends who have business relationships with Dow, our customers, suppliers, distributors, agents or competitors. These circumstances can raise conflict of interest questions, because others might think we are favoring these relationships above the interests of the Company.

We must disclose to our supervisor or the Office of Ethics and Compliance any situation in which:
• A relative or close friend has a financial interest in, or works for, a Dow customer, supplier, distributor or agent if we are in a position to affect Dow’s business with them.
• An immediate family member is employed by a competitor of Dow.
• We are put in a position where we directly or indirectly hire, supervise or otherwise have authority over a relative or romantic partner.
Gifts and Entertainment

Gifts and entertainment are often used to strengthen business relationships, but we should not accept or offer them if doing so could affect, or appear to affect, impartial decision-making.

Before offering gifts or entertainment to customers or others outside the Company, we should understand the recipient’s rules about accepting gifts and entertainment.

We do not offer or accept gifts or entertainment that could cause embarrassment to the Company, could be construed as a bribe or kickback, or are in exchange for preferential treatment in any business dealing.

Guidance Specific to Gifts:

• We never offer or accept gifts in cash or a cash equivalent, such as a gift card.
• We do not offer or accept a gift that is of more than modest value by local standards, consistent with local custom.
• We may accept gifts or discounts offered to a large group of employees as part of an agreement between the Company and a customer, supplier, distributor or agent.

Guidance Specific to Entertainment:

• We do not offer or accept entertainment unless it is consistent with customary business practice. For example, occasional business meals or attendance at a local theater or sporting event with a customer or a supplier are generally acceptable.
• We do not offer or accept entertainment that is sexually oriented or is otherwise indecent or inconsistent with our Value of Respect for People.

Dow Keyword: TER Policy

If you have additional questions, contact your supervisor, an attorney in the Legal Department or the Office of Ethics and Compliance.

Government Officials

Specific laws apply to interactions with government officials, including employees of government-owned or government-controlled companies. Refer to the Bribery and Corruption section of the Code for specific guidance on gifts and entertainment offered to government officials.
Business and Financial Records

Business and financial records are essential to Dow's success. The integrity and accuracy of these records help internal decision-making and are the basis of our reporting to shareholders, investors, creditors, government agencies and other stakeholders.

We must:

• Keep and present all Company records and reports in accordance with the law. These records include accounting records as well as any other electronic or written records, such as expense reports, time sheets, medical claim forms, personnel reviews and the wide variety of analytical, engineering and technical reports.
• Establish and maintain a system of strong and effective internal controls.
• Ensure that all Company records accurately and fairly reflect the underlying transaction.
• Never falsify any document.
• Record all financial transactions in the proper account, department and accounting period.
• Ensure that all actions and commitments are in accordance with Dow's Authorization Policy and Delegation of Authority.
• Validate that all public communications, including reports to government authorities, are full, fair, accurate, timely and understandable.
• Raise any concerns about the accuracy of Dow records with finance management or through another appropriate channel, such as the Dow EthicsLine.

Dow Keyword: Internal Control

Use and Protection of Company Resources and Information

We all have an obligation to protect Dow resources and use them properly.

Dow resources are intended for business use. In certain situations, personal use may be acceptable on a limited basis as long as we follow Dow's policies and do not generate additional costs or offend co-workers.

As employees we are expected to:

• Use Company funds legally and responsibly.
• Safeguard Dow resources from theft, waste and carelessness.
• Not use Company funds or other resources to support an outside business or unauthorized activity.

Examples of Company resources include:

• Company funds, credit cards and other accounts
• Computers, electronic networks and other office equipment
• Telephone and mobile communications devices
• Internet access and e-mail
• Supplies
• Tickets to sporting and entertainment events
• Company proprietary information

www.dowethicsline.com
Intellectual Property
Our continued success and future growth depend upon innovative products and solutions. To achieve a sustained competitive advantage for Dow businesses, we must protect our intellectual property against theft, misuse and loss.

With the support of the Legal Department, we all must take appropriate steps to secure intellectual property protection for Dow inventions, proprietary information, trademarks, trade secrets and copyrighted materials.

This includes:
- Using the Dow brand and trademarks, including the Dow Diamond, in accordance with Company guidelines.
- Reporting to the Legal Department any concerns about Dow intellectual property being infringed, misused or misappropriated.
- Respecting the trade secrets, copyrights, trademarks, patent rights and proprietary information of third parties by avoiding unlawful use or infringement.

Information Technology
We rely heavily on computer systems and telecommunications networks. We must protect those systems from misuse.

We will:
- Follow the Dow Information Protection Policies and security and data protection requirements.
- Use and protect passwords for computer or network access.
- Store sensitive, proprietary or highly confidential information in protected files on secure servers provided by the Company.
- Safeguard all electronic devices at all times.
- Protect information security controls.
- Protect Company equipment or systems from pornography, gambling, and illegal or other offensive or inappropriate purposes.

Dow Keyword: Information Protection

As permitted by applicable law, Dow reserves the right to access, monitor, search, review, collect, transfer, restrict, block or otherwise control Dow information and any information stored on Dow equipment or equipment authorized by Dow. For more information, see Dow’s Information Security policies.
Proprietary Information and Records Management

We are all responsible for maintaining the integrity of Dow information and for using it appropriately. Unauthorized disclosure of Dow information could harm the Company or give an unfair advantage to others.

This means we:

• Classify documents according to Dow's Information Handling Policy.
• Retain and discard Company records consistent with the Dow Records Management Policy and schedules.
• Follow all special record-keeping requirements issued with respect to internal investigations, litigation and government inquiries.
• Report loss of any Dow information in a timely manner.
• Observe all contractual obligations to safeguard others’ information, and do not disclose the proprietary information of others.
• Limit access to sensitive, proprietary or highly confidential information to those who are trained in the proper handling of such information.
• Do not discuss Dow information where the conversation may be overheard or compromised.

If it is necessary to share proprietary information outside the Company, we must first consult a Legal Department Attorney to ensure that adequate protections, such as a confidentiality agreement, are in place.

Examples of Dow proprietary information include:

• Research and development (R&D) information
• Trade secrets
• Personnel records
• Business plans and proposals
• Capacity and production information
• Marketing or sales forecasts and strategies
• Client and customer lists
• Pricing lists or strategies
• Supplier data

We must obtain appropriate approval for external presentations that contain Dow information.

Even after we leave Dow, we have an obligation to protect the Company's proprietary information.

Dow Keywords: Records Management, Information Protection and Information Handling Policies

Dow as a Service Provider

When Dow is acting as a service provider, it has an obligation to protect the confidential information of its customers. This “Customer-Confidential Information” should be shared only with authorized Dow representatives, as designated in the controlling agreements. Please seek guidance before you disclose any Customer-Confidential Information.
Data Privacy
Consistent with Dow’s Value of Respect for People, we respect the privacy of individuals and protect their personal data.
- We handle personal data responsibly and in accordance with the Dow Data Protection/Privacy Policy, any contractual obligations and local laws.
- We use personal data only for legitimate business purposes.
- We are open and transparent about the purposes for which we use personal data.
- We protect personal data from unauthorized disclosure.
- We limit disclosure of sensitive personal data to those who are under professional obligations of confidentiality and who are trained in the proper handling of this kind of information.

Examples of “personal data” include: address, age, employment, and educational and training information. Some examples of “sensitive personal data” include: medical information, financial account numbers, Social Security numbers, race, religion, sexual orientation, criminal convictions and political affiliations.

Dow Keyword: Data Protection

Inside Information and Trading
Many of us are exposed to information about Dow—or about companies that Dow does business with—that may not be known to the public. This nonpublic information may, among other things, relate to business or manufacturing plans, new products or processes, mergers or acquisitions, serious business risks, sales, negotiations or other financial information.
- We do not trade in Dow securities, or those of any other company, using material nonpublic information gained through our work at Dow. Nor do we disclose this kind of information to others so that they may trade. Insider trading is illegal.
- Material nonpublic information is any information that could affect a reasonable investor’s decision to buy, sell or hold the securities of a company.

Insider trading rules are complex. When in doubt, consult the Office of the Corporate Secretary or a Legal Department Attorney.

We may not use material nonpublic information about Dow, our customers or our suppliers for personal gain.
We do not give anything of value to anyone to obtain any improper business advantage.

Bribery and Corruption

We are committed to maintaining the highest ethical and legal standards in our relationships around the world. This includes our relationships with governments and government officials as well as with other businesses. We do not participate in bribery or corruption in any form.

- Interactions with government officials are subject to complex legal rules. The law establishes severe penalties for bribery and corruption, including large fines and imprisonment. Even simple acts like providing gifts to a government official can raise suspicions of corruption.
- To avoid even the appearance of improper conduct, we must obtain approval from a Legal Department Attorney before giving anything of value (including gifts, meals, entertainment, and business or employment opportunities) to a government official.
- Prior approval is not required where a payment is necessary to ensure safety or safe passage, but we should notify a Legal Department Attorney of the payment as soon as possible after the fact.
- We are equally vigilant to avoid bribery and corruption in transactions with other businesses and private parties.

Who are government officials?

- Employees of any government or government-controlled entity anywhere in the world, including low-level administrative officials
- Political parties and party officials
- Candidates for political office
- Employees of public organizations, such as the United Nations
- Employees of state-owned enterprises

When in doubt, contact an attorney in the Legal Department or the Office of Ethics and Compliance.

No Bribes

A bribe is giving or offering something of value to someone to improperly influence a decision.

We must not offer, promise or give anything of value to a government official, or to anyone else, in order to gain a business advantage. Nor may we accept bribes from others.

Examples of bribes include paying a government official to:

- Award a contract to the Company.
- Obtain advantageous tax or customs treatment.
- Obtain permits or regulatory approvals.
- Bypass or break laws or regulations applicable to the Company.

Bribery also includes kickbacks—the giving or receiving of personal payments to influence the awarding of a contract or other business transaction.

We must not use a third party—such as a subcontractor, consultant or agent—to pay a bribe. The Company and individual employees may be liable if a third party pays a bribe on our behalf, even if we did not direct the payment. We must take care when selecting agents and consultants to ensure that there is no indication that they might pay a bribe.

Dow Keyword: Anti-Bribery
Competition
Our responsibility to conduct business ethically extends to our relationships with customers, shareholders, suppliers, competitors and regulators. This means competing within appropriate legal boundaries and on the basis of price, quality and service.

Antitrust and Fair Trade
- We win business ethically and obey all antitrust and trade laws, which demand free and fair competition.
- We do not have discussions or reach agreements with competitors or others that may restrict open competition. This includes conversations with competitors about:
  - Prices or credit terms.
  - Submission of bids or offers.
  - Allocation of markets or customers, or division of territories.
  - Restrictions on production or distribution.
  - Boycotts of suppliers or customers.
- We do not engage in any unfair, misleading or deceptive trade practices.
- We advertise, promote and label our products and services in a factual, honest and informative way.

Gathering Competitive Information
Information about our competitors enables us to better understand market demands and improve our products and services, but we must always gather competitive data legally and ethically.

To obtain competitive intelligence, we will use publicly available information, including published articles, market analyses and purchased reports.
- This means we will not seek a competitor’s confidential information, or accept anyone else’s confidential information, without their consent.
- We will never use illegal or unethical means (e.g., theft, bribery, misrepresentation or espionage) to obtain competitive information.
- We will comply with all applicable laws when gathering competitive information.

Dow Keyword: BIS
Trade Controls

We conduct business on an international scale in a world that can be dangerous. To prevent terrorism, halt the proliferation of weapons and fight narcotics trafficking and other crimes, various governments have established trade controls that restrict certain business transactions and the movement of certain goods across national borders.

- We must abide by all trade controls applicable to our business.
- Trade control laws can restrict:
  - Export of certain goods, services and technology.
  - Business dealings (including import, export and investments) with certain countries, entities and individuals.
  - Travel to certain countries.
  - Exchange of information.

- We must follow U.S. export controls, trade restrictions, economic sanctions and anti-boycott laws everywhere in the world, as well as local trade controls wherever we do business.

The laws in this area are complex and subject to frequent change. The penalties for violating trade control laws can be severe. Consult the International Trade Organization (ITO), your regional ITO professional or a Legal Department Attorney before engaging in any transaction that may involve products subject to export controls, a sanctioned country or a prohibited party.

Dow Keyword: ITO
C i t i z e n s h i p

At Dow, we conduct our business with the recognition that we all live together on a planet with limited resources. Making the most of the resources we have and accelerating progress on efficient and renewable solutions are not only a strategic imperative, they are ingrained in our Values. So everything we do and how we do it matters.

Setting the Standard for Sustainability

We are all part of a complex system that requires balance, innovation and an uncompromising focus on protecting our planet. Our commitment to each other and to environmental stewardship requires us to:

• Comply at all times with environmental laws and Dow policies applicable to our area of business.
• Ensure that our products, operations and behaviors adhere at all times to applicable governmental standards, Dow environmental standards and approved compliance plans.

The laws are complex, are subject to frequent changes and vary from country to country. If you have any questions or concerns, you should seek advice from a Legal Department Attorney or an EH&S subject matter expert to clarify how these laws apply to your job.

Dow Keyword: Sustainability

Corporate Citizenship

We are committed to making positive change through community partnerships, charitable giving and volunteerism.

Through our science, expertise, volunteerism and donations, we are taking bold steps to help solve some of the world’s most challenging problems. Through relationships with our neighbors and partners, we are building better, stronger, more sustainable communities in the places where we do business. Our sustainability goals and corporate citizenship initiatives are a source of pride for employees.

• We engage in active dialogue with organizations representing the communities where we do business.
• We support initiatives that address the goals and needs of the community and seek to leverage our capabilities to support those communities.

Dow Keyword: Corporate Citizenship

We strive to reduce waste and emissions, and we promote resource conservation at every stage of the life cycle of our products.

The United Nations Global Compact

As a signatory to the United Nations Global Compact (UNGC), we are committed to exhibiting and promoting appropriate conduct. The UNGC is a United Nations initiative through which businesses commit to ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption. The principles are simple but powerful statements of social, environmental and business responsibility; they form the ethical framework against which we can plan, measure and communicate our performance.
Charitable Activities and Volunteerism

Through the Corporate Contributions Committee and The Dow Chemical Company Foundation, Dow participates in a variety of charitable endeavors around the world. That participation ranges from financial contributions to donations of Dow products, services and other resources.

We will:
- Support our personal community activities on our own time, with our own resources and not as a representative of Dow.
- Obtain authorization for any donation to any charity in Dow’s name.

We will not:
- Represent Dow in any public process or forum unless specifically requested to do so by management.
- Obtain prior reimbursement from Dow for personal expenses or donations to charitable activities.

Dow Keyword: Contributions

Political Activities and Contributions

Dow encourages participation in local, national and international political processes.

- If we express personal views in a public forum (such as a letter to the newspaper), we must not use Company letterhead or Company e-mail, or refer to our business address or title.
- We always comply with all relevant laws regulating Dow’s participation in political affairs, including political contributions.

Communications with the Public

We strive to communicate with the public in an accurate and consistent way. To be sure that we comply with the law and protect our interests, only those who are specifically designated to do so should represent the Company to the public or media.

- If we receive an inquiry from an outside contact about a Company matter, we should direct the inquiry to our local Public Affairs representative.

Social Media

Social networks and other forms of social media are becoming part of the business mainstream. In general, the rules that apply to new communication tools are consistent with traditional communication rules. Specifically,

Do:
- Clearly distinguish between authorized business communication and personal communication. If you give a personal opinion on public issues, do not create the impression that you represent Dow or are expressing the views of Dow.
- Respect trademark, copyright, fair use, trade secret and financial disclosure laws and Company guidelines.
- Adhere to Dow’s Values in all authorized business communications.

Don’t:
- Speak on behalf of Dow unless you are a designated spokesperson and have permission to do so.
- Disclose any confidential information belonging to Dow, its employees, customers, suppliers or other business partners.
- Refer to Dow customers, suppliers or business partners without their approval.
- Endorse Dow products or services without prior approval.
- Divulge personal data about others, especially personal data obtained as part of your Dow relationships.

Dow Keyword: Social Media Policy
Discipline for Code Violations
We strive for consistency and fairness in discipline for Code violations. Discipline may include a verbal or written warning; suspension with or without pay; loss or reduction of bonus or stock options; demotion; or, for the most serious offenses or repeated misconduct, termination of employment.

We will not tolerate any reprisal or retaliation against anyone who reports a potential violation in good faith. Retaliation is grounds for dismissal.

The Office of Ethics and Compliance, in conjunction with Regional Ethics and Compliance Committees (RECCs), is responsible for Code administration, with oversight by the General Counsel and the Audit Committee of the Board of Directors. The RECCs comprise the Country or Regional Leader, along with senior Finance, Human Resources and Legal personnel, and may include other senior employees.

Investigation and Response
The Company takes seriously and fully investigates all potential legal or Code violations. The RECCs have responsibility for investigations in their geographic regions, with oversight by the Office of Ethics and Compliance. Relevant subject matter experts conduct the investigations. Investigations are conducted in a way that is respectful, confidential and fair. If the investigator substantiates an allegation, an appropriate management team will review the findings and determine the final outcome.

The Company will protect anyone who raises a concern honestly, but it is a violation of the Code to knowingly make a false accusation, lie to an investigator, or interfere with or refuse to cooperate in an investigation. We are all expected to be truthful and fully cooperate in any investigation.

Acknowledgement
We must periodically acknowledge that we have read the Code and agree to abide by it. Failure to read or acknowledge the Code does not excuse us from compliance with the Code.

Waiver
The Board of Directors or its designated committee must approve any waiver of a provision of the Code, and the Company will disclose such waivers publicly as required by law.
Contacts

Questions or concerns about proper conduct may be addressed with:

- Supervisor
- Human Resources Representative
- Regional Ethics & Compliance Committee member
- Legal Department Attorney
- Office of Ethics and Compliance
- Dow EthicsLine

Dow EthicsLine

The Dow EthicsLine is operated by an outside contractor that provides similar services to other global companies. Calls to the EthicsLine are answered by a trained communications specialist, who documents the question or concern and forwards the report to the Office of Ethics and Compliance for review and handling.

To contact the Dow EthicsLine:
Call toll-free using the access codes that can be found on the website, or submit a report online.

To contact the Office of Ethics and Compliance:
Call +1-989-636-2544
E-mail ethics@dow.com
Fax +1-989-636-6857
Mail the Office of Ethics and Compliance, 2030 Dow Center, Midland, MI 48674-2030

The Diamond Standard
Diversity, Equal Opportunity and Respect in the Workplace

Q: One of the employees in our workgroup frequently makes insensitive comments that are hurtful to some members of our team. He seems to think his comments are funny, but they have affected the morale and productivity of our workgroup. Many in the workgroup are uncomfortable with the comments, but we’re afraid of making matters worse if we tell him that his behavior is inappropriate. What should we do?

A: Ideally, the first step would be to inform the employee that his comments are offensive to members of the group and that such behavior is contrary to our Value of Respect for People. However, if you are uncomfortable discussing the situation with the employee, contact your supervisor, HR or the Dow EthicsLine. Also, you should encourage others who are offended by the remarks to contact their supervisor, HR or the Dow EthicsLine. Dow takes concerns about inappropriate workplace behavior seriously, and all issues will be addressed appropriately.

Q: My supervisor, when frustrated, often yells, points his finger in an aggressive way and makes inappropriate comments about people’s competence. This behavior has reached the point where people are afraid of him. More and more people are calling in sick for work, and no one wants to speak out in team meetings for fear of being reprimanded for saying “the wrong thing.” The overall work environment is very stressful. What can I do?

A: While the general recommendation would be to tell the supervisor that his behavior is inconsistent with Dow’s value of Respect for People, in this case it appears that such a conversation might be difficult. You should contact another supervisor, HR or the Dow EthicsLine.

Health and Safety in the Workplace

Q: I know we’re supposed to report injuries, job-related illnesses and accidents, but my performance award depends on our incident rate going down. What does Dow really want?

A: We want every employee to report injuries, job-related illnesses and accidents. It is only through such reporting that Dow can respond to dangerous situations, measure our safety performance and uphold our commitment to health, safety and the protection of the environment. Awards for all employees are tied to overall performance, in which safety is one of several components. To protect all those working in Dow facilities and those living in the communities in which Dow operates, accurate and timely reporting is a necessity.

Q: My supervisor asked me to skip some required quality checks in order to make a production deadline. What should I do?

A: Do not skip the quality checks. If someone asks you to do something that you know is wrong, do not do it. If you are uncomfortable talking to your supervisor about the situation, immediately contact your second-level supervisor, your site EH&S leader or the Dow EthicsLine.
Substance Abuse in the Workplace

Q: I noticed that a co-worker appears to be under the influence of alcohol or drugs at work. What should I do?

A: This is a serious situation. If possible, take a moment to observe your co-worker’s actions and behaviors so you can describe the situation. Then, immediately contact the nearest supervisor, HR or Security and inform them of your concern and the behavior you observed. While the behavior may be the result of an illness or another cause, such an observation should always be reported immediately.

Q: I am not on call, but I have been asked to come into work to help address an emergency situation. Does it matter if I have had a few drinks? Should I still come into work?

A: The Dow Substance Abuse Policy applies, and you should tell the caller about your situation. The spirit and intent of this policy is to keep Dow people and facilities safe. If your judgment or physical abilities are impaired, then it is not safe for you to drive or make important decisions, and you should not do so.

Violence in the Workplace

Q: What should I do if I see a potentially violent situation developing at work?

A: If you see or hear anything that is threatening or carries the potential for violence, contact your supervisor, HR or Security. Do not hesitate – act right away. Please do not attempt to intervene.

Q: The Company recently terminated the employment of one of my co-workers. She was visibly upset, and as she was packing up her personal belongings, she told everyone that she intended to “get even” with those who were responsible for her separation from the Company. Is this something I should report?

A: Yes. Immediately inform your supervisor, HR or Security about the comments.

Conflicts of Interest – Outside Interests and Outside Employment

Q: Can I invest in a company that supplies goods or services to Dow? Would such an investment be a conflict of interest?

A: Possibly. The answer depends on factors such as your job responsibilities at Dow, whether you have any inside information about the supplier (see the Inside Trading section of the Code), your ability to influence Dow’s purchasing decisions with the supplier and the amount of your investment. Small investments in publicly traded companies are usually not a problem. When in doubt, speak with your supervisor, a Legal Department Attorney or the Office of Ethics and Compliance.

Q: My spouse and I own a welding business. While my spouse is responsible for the day-to-day operations of the business, I am also an officer and stockholder in the welding company. My spouse wants to bid on a Dow project and has asked me if bidding would constitute a conflict of interest because I am a Dow employee. Can my spouse bid on the business? Is there anything I should do?

A: The answer depends on your Dow job responsibilities. Would you be reviewing or approving the bid or managing the project? Do you supervise anyone who would be reviewing or approving the bid or managing the project? If you are not in a position to influence the selection of the bid, and if you would not be involved in overseeing your spouse’s work on the project, then it is probably acceptable for your spouse to submit a bid. The appropriate course is to disclose all the facts to your supervisor or the Office of Ethics and Compliance before your spouse submits a bid.
Conflicts of Interest – Speaking at Conferences

Q: I was invited to speak at a conference regarding my area of expertise within Dow, and the sponsoring organization is offering to pay for all my expenses – travel, lodging, meals, etc. May I accept the invitation?

A: Generally, Dow should pay for all the costs and expenses associated with the speaking engagement to establish Dow’s independence and avoid the appearance of a conflict of interest. However, under certain circumstances where Dow’s independence is clearly established and there is no possibility for a conflict of interest, it may be permissible for the sponsoring organization to pay for reasonable lodging and travel expenses, provided that the presentation is part of the employee’s area of responsibility, the employee has obtained prior supervisor approval and the presentation has been approved by the appropriate parties within Dow. Under no circumstances should a Dow employee accept compensation for speaking at a conference. If the sponsoring organization offers an honorarium, decline the offer or direct the payment to a charitable organization.

Conflicts of Interest – Relatives, Friends and Personal Relationships

Q: I would really like to ask my supervisor out on a date. We work well together, we have similar interests and I really think we have the potential for a serious relationship. Do Dow policies prevent us from dating?

A: Under Dow’s Conflict of Interest Policy, dating your supervisor would create an actual or perceived conflict of interest. This kind of romantic involvement will always give the appearance that the relationship influenced assignments and other work conditions. In such a situation, promptly contact your second-level supervisor, HR or the Office of Ethics and Compliance.

Q: My spouse just accepted a job with a Dow competitor. Should I notify anyone within Dow?

A: Yes. Promptly notify your supervisor or the Office of Ethics and Compliance of the specifics regarding your spouse’s new job. Your prompt disclosure will allow Dow to determine if there is an actual or perceived conflict of interest arising from your job responsibilities and your spouse’s job responsibilities. You will also need to disclose this information on your annual Conflict of Interest Questionnaire. In addition, you and your spouse must avoid any discussion of confidential business information at all times.

Conflicts of Interest – Gifts and Entertainment

Q: What if a supplier offers me a gift of nominal value such as a baseball cap, coffee mug or meal? Is it OK to accept such a gift?

A: Yes. You are generally permitted to accept gifts of nominal value. The conflict of interest issue arises when the value of the gift influences or might appear to influence your decision-making ability with the supplier. When in doubt, contact your supervisor or the Office of Ethics and Compliance, or simply decline the gift.

Q: What should I do if I receive an unsolicited basket of fruit and chocolate from a supplier as a holiday gift?

A: Inform your supervisor that you received the gift. If the gift is extravagant, contact the supplier and inform them that you cannot accept it and make arrangements to return the gift. In this case, if the basket is of reasonable value, then put it out in your workplace where it can be shared by all employees.

Q: A supplier recently invited me to use his mountain condominium for a weekend trip. He claims there is no increased cost to him if I use it, and I could really use the vacation. Is it OK to accept the invitation?

A: No. The use of the condominium has significant value to you, even if there is no additional cost to the supplier. This is the type of gift that has the potential to influence your decision-making, and therefore it creates the appearance of a conflict of interest.

Q: I received an invitation to participate in a vendor-sponsored golf event. May I attend?

A: The answer depends on the value of the golf event and the status of Dow’s business relationship with the vendor. If Dow is currently in negotiations with the vendor or if the invitation is of excessive value, then it could be viewed as an attempt to influence your decision, and the invitation should be declined. However, if it is of reasonable value and your decision-making will not be influenced by the event, then it is permissible to accept. Before accepting any such invitation, you should always notify your supervisor.
Business and Financial Records

Q: I recently discovered an error in data the Company submitted to a regulatory agency. I know we should correct the data, but I don’t want to make the Company look bad. I don’t think anyone will ever detect the error, so is it OK to keep silent?

A: No. We have an obligation to ensure that all reports to regulatory agencies are full, fair, accurate, timely and understandable. You must report your findings. Inform your supervisor, a Legal Department Attorney or the Office of Ethics and Compliance so that the Company can review the data and determine the appropriate corrective actions.

Q: While reviewing our monthly invoices, I noticed that we overbilled a customer. The bill was reasonable, so the customer paid it without any questions. The overpayment is good for our profitability, and I doubt anyone will ever notice the overbilling. Should I notify anyone?

A: Yes. Immediately notify your supervisor or Customer Financial Services so the overpayment can be corrected. Regardless of whether the overbilling might ever be discovered, we must act with Integrity in all situations and treat all our customers and other business partners fairly.

Intellectual Property

Q: I recently noticed labels with the Dow name and Dow trademarks on drums of product, but the labels didn’t look right. The colors were wrong and the information and format were different from all the other Dow products I have seen. I wondered if the products could be counterfeit, but I wasn’t sure. What should I do in a situation like this?

A: Counterfeit products are a legitimate concern, and employee observations can help Dow protect its trademarks and reputation. Such products can present serious health and safety issues. If you ever see products that appear to be inappropriately labeled with the Dow name or a Dow trademark, immediately contact the Dow Trademark Department or the Office of Ethics and Compliance. Please provide whatever details you can about the product, packaging, location and labeling to assist with a further inquiry.

Q: I recently accepted a position in the Company’s Research and Development laboratory. I previously worked for a competitor and just realized I may be involved in developing technology for Dow that is very similar to what I developed for my prior employer. Should I inform my supervisor?

A: Yes, immediately inform your supervisor that there may be a conflict with your obligations to a prior employer, but take care not to disclose any confidential information belonging to the prior employer in doing so. You should abide by any obligation to your prior employer not to disclose or use its confidential technical information. Dow expects you to honor your confidentiality obligations to your prior employer and does not want to contaminate Dow’s independent research with information subject to obligations to a third party. When in doubt about the scope of obligations to a prior employer and how this may affect your responsibilities at Dow, contact Dow’s Intellectual Property group in Legal or the Office of Ethics and Compliance.
Information Technology

Q: I have a software program that I would like to install on both my home and Dow computer. Having the software on both computers would make my job much easier. Can I copy software from my home computer and install it on my Dow computer? Can I copy software from my Dow computer and install it on my home computer?

A: No. You can install only Dow-approved software on your Dow computer. In addition, you cannot copy any software from your Dow computer without first obtaining approval from Dow Information Systems. Every software program is governed by a separate software-license agreement, and we must comply with those terms and conditions.

Q: What are the rules surrounding the use of Company resources (such as Dow workstations, photocopiers and telephones) for personal matters?

A: Dow resources are intended for Dow work. However, employees may use Company resources for personal reasons, provided such use:

• Occurs on an occasional and limited basis
• Complies with Dow’s Information Protection Policies, Dow’s Respect and Responsibility Policy and all other applicable Dow policies
• Does not result in measurable increased costs to Dow
• Does not distract co-workers
• Recognizes that appropriate personal use requires good judgment

If you have a specific question regarding the use of a Company resource, talk to your supervisor. In addition, you can contact Information Systems, HR or the Office of Ethics and Compliance for assistance.

Q: What should I do if I receive an unsolicited e-mail that contains offensive material and violates Dow’s Respect and Responsibility Policy?

A: Immediately report the incident to your supervisor, Information Systems Security, HR or the Office of Ethics and Compliance. If you feel comfortable doing so, notify the sender that his or her message is offensive, contrary to Dow’s Respect and Responsibility Policy, and that you do not wish to receive such messages in the future. Finally, delete the message unless instructed otherwise.

Proprietary Information and Records Management

Q: I found what appear to be some highly confidential documents on the photocopier/fax machine that have not been retrieved by the owner or recipient. What should I do with the documents?

A: Though tempting, do not read the documents except to identify the owner or intended recipient. If you can identify the owner or intended recipient at Dow, deliver the documents. If you cannot determine the owner or intended Dow recipient, deliver them to your supervisor. If the documents appear to have been sent to Dow in error and may contain third-party information, immediately contact a Legal Department Attorney. Most importantly, do not leave highly confidential documents at the machine and do not discard them.

Q: I am working on a project with a customer, and the project has reached the point where both sides need to disclose confidential information. What should I do?

A: Dow and the customer should enter into a confidentiality agreement to protect each party’s confidential information. Contact a Legal Department Attorney before sharing any confidential information to receive detailed information on how to initiate an agreement.
Data Privacy

Q: I’ve been asked to participate in a survey that includes questions about me and my role. Is it okay for me to participate?
A: That depends on whether the survey is for Dow purposes. If the survey is administered on behalf of Dow, the survey should be clear about its purpose, where the survey results are processed, how the data are secured, and whether data will be reported as non-identifiable aggregate responses. If these conditions are met, you may participate in the survey. In general, survey participation is voluntary. Be cautious about external surveys as they may ask you to disclose Dow information.

Q: I have a colleague who performs the same role I do, but in another country. We often have a need to share information about the employees in our function as part of our job. Are there any issues?
A: You need to be careful about what employee information you can share. In general, information about team members’ roles, responsibilities and operational qualifications to safely do a specific task is appropriate to share among global team members, provided those team members have a legitimate business purpose for such information. For example, if you are scheduling project work and specific project activities require respirator training, sharing may be appropriate. If, however, the employee information relates to performance or is otherwise part of an employee’s confidential personnel file, the information should be kept confidential among HR and the individual’s supervisor or report-to structure. Always be careful to preserve the security of personal data.

Inside Information and Trading

Q: An employee of one of our major customers, with whom I work regularly, just told me confidentially that the customer is about to announce a major acquisition. I’m very excited about the opportunity for increased sales and see this as a great investment opportunity. I just know the price of the customer’s stock will increase when the acquisition is announced. Can I buy shares of the customer’s stock in hopes of realizing a quick profit? Can I tell my sister?
A: The answer to both questions is no. The soon-to-be-announced acquisition represents material information that is not available to the investing public. If you purchase the stock or advise your sister to buy the stock, you are violating insider trading laws. It does not matter that you would not be trading in Dow stock.

Q: My job requires that I read a number of trade journals to keep apprised of developments in my functional area. From everything I have read, I suspect two major companies are about to announce a joint venture. I would like to purchase stock in the companies, but I don’t want to violate any laws. Am I allowed to purchase shares based upon the information I obtained solely from the trade journals?
A: Yes. If you are making your investment decisions solely upon publicly available information, you are not violating the insider trading laws. Concerns about insider trading arise when you are basing your investment decisions on material information that is not available to the general public.

Bribery and Corruption

Q: We are working to obtain a product registration from a government agency and have identified a consultant who promises he can expedite the approval process. Can I work with this consultant?
A: We need to be certain that anyone Dow engages to act on our behalf complies with all applicable laws and acts consistently with Dow’s Values. This includes preventing any acts of bribery or corruption. To do so, we must conduct appropriate due diligence before engaging any intermediaries. Conducting due diligence not only allows Dow to learn more about the potential intermediary, it also gives us the opportunity to educate the potential intermediary about Dow’s expectations before they perform any services for Dow.

Q: I have been working with a distributor for years, but recently their representative asked me if we could amend our contract with them to include a rebate. The representative said that it would really help them speed up some of the permits that are required to sell product into new markets they are trying to enter. What should I do?
A: Even if we have conducted due diligence on an intermediary or other business partner in the past, we are obligated to monitor their conduct to ensure they continue to comply with all applicable laws, particularly anti-bribery laws. The distributor’s conduct raises a red flag that the rebates may be used to pay bribes to speed up the permits. You should contact the Legal Department or the Office of Ethics and Compliance.
**Competition**

Q: While attending an industry conference, a group of attendees who work for Dow competitors began discussing ideas for dividing up their territories to increase sales and reduce competition among the parties. I knew the conversation was wrong, but what should I do in such a situation?

A: Allocating territories between competitors is a violation of antitrust and competition laws. If you ever find yourself in such a situation, immediately excuse yourself and make it very clear that you do not want to be part of any such discussion. Then promptly report the conversation to your supervisor and the Legal Department.

Q: A friend sent me an e-mail with some nonpublic information about a Dow competitor’s pricing and marketing strategy. I didn’t request the information. What should I do now?

A: Don’t do anything with the information until you speak with your supervisor and a Legal Department Attorney or the Office of Ethics and Compliance. If you ever receive or are offered this type of information, whether in written or oral form, regardless of the source, tell the person that the transfer of such information violates Dow policy and possibly the law and that it must stop immediately.

**Setting the Standard for Sustainability**

Q: Where can I learn about Dow’s sustainability commitments and how to live and work more sustainably?

A: Dow Keyword: Sustainability will take you to useful resources, including a sustainability toolbox for businesses, our long-term commitments and a link to the EVERGREEN site, where you can find ideas on individual efforts that one can take to “live green and save green.”

Q: Why is sustainability important to Dow?

A: Dow’s vision will be achieved only if we focus on sustainability – making every decision with the future in mind. When the Company amended its mission statement in 2009, we added “providing sustainable solutions to our customers." In order to successfully innovate what is essential to human progress, we need to do it in a way that is good for the world today and for the long-term future.

**Charitable Activities and Volunteerism**

Q: What should I do if another employee asks me to contribute to her favorite charity? What if a senior-level employee asks me to contribute to a particular charity? Am I required to contribute?

A: Individual contributions are a personal decision. An employee should never feel compelled to make a charitable contribution. Supervisors and managers should be especially sensitive that their position in the Company could lead others to feel pressured to contribute to particular causes or organizations and avoid any circumstances that could cause this. Company donations are made based on alignment with the Company’s Corporate Citizenship strategy and specific business rules and decision criteria; they are administered by the Corporate Contributions Committee. Only employees with charitable donations delegation of authority can make contributions on the Company’s behalf.

Q: I volunteer for a community aid organization on my own time. However, sometimes during holidays or times of crisis, they need more help. Can I volunteer more hours even if some of the time overlaps with my work hours?

A: Dow supports the volunteer work employees undertake to meet the needs of our communities. However, employees are reminded that their volunteer efforts should not interfere with their job responsibilities or performance. Employees should work with their supervisor or functional/business leader to determine if alternative arrangements may be made if the aid organization needs extra short-term help.

**Political Activities and Contributions**

Q: When volunteering for a political campaign or publicly endorsing a candidate for political office, is it OK for me to openly promote that I am a Dow employee and that this candidate will best represent Dow’s interests?

A: The short answer is no. Dow supports employee participation in political activity, but individual political views are just that, individual. It is not appropriate for employees to indicate they represent Dow unless they have been asked to do so by Dow Government Affairs as part of their role.
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Communications with the Public

Q: Can I be a reference for a former Dow employee? What do I do if I receive a call asking about a former Dow employee?

A: While employees can provide personal references for non-employment matters (such as academic programs, admission to professional organizations, adoption), all questions regarding employment or performance should be referred to Human Resources.

Q: An industry analyst called to ask for a comment regarding my area of responsibility at Dow. I knew the answer to the analyst’s question, but it just didn’t feel right, so I declined his request. Did I do the right thing?

A: Yes. You should never answer any questions about Dow business from analysts, reporters or anyone else outside of the Company unless it is your job to do so. Refer calls from shareholders and financial analysts to Investor Relations and calls from the media to Public Affairs. These Dow functions will determine the nature of our Company response and contact you if your involvement is required.

Social Media

Q: Many in my workgroup maintain personal pages on a popular social media site, and we have readily “friended” each other. Sometimes we complain and share our views about work. Our comments are honest, critical and at times a bit crude. Our supervisor has tried to friend us, but we continually ignore his requests. We don’t want him to see what we have written about him and our Company. We just learned that somehow he saw our postings. Is this a problem?

A: Yes. In many countries, including the U.S., employees have a legally protected right to freely discuss their wages, benefits, and terms and conditions of employment amongst themselves and with others. In these countries, supervisors are not entitled to intrude into their subordinates’ conversations on social media sites, so long as these conversations are taking place on non-working time. Employees are free to “friend” supervisors if they choose to, or to decline to do so. If you feel that any supervisor pressures you in any way to “friend” them or to accept a “friend” request, you should contact Human Resources. Of course, some types of communication are not protected by law and must be avoided in any forum, including social media websites. For example, employees do not have the right to disclose confidential Company information that does not relate to wages or benefits, to publicly disparage the Company’s products or services, to engage in unlawful harassment of other employees, or to make maliciously false statements.

Q: If my business wants to use social media for marketing purposes, will we need legal approval?

A: Yes. Any social media strategy must include business legal approval and be reviewed according to the Social Media Policy.