

# **DOW CHEMICAL COMPANY LIMITED**

## **Modern Slavery Act Transparency Statement**

### **Introduction:**

Dow Chemical Company Limited makes this statement pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes the slavery and human trafficking statement of Dow Chemical Company Limited and its UK subsidiaries for the financial year ending 31 December 2017. This statement delineates the actions Dow Chemical Company Limited and its UK subsidiaries have taken during the period to identify potential modern slavery risks in our business operations and the steps implemented which are aimed at ensuring there is no slavery or human trafficking in our supply chains. Respect for people is one of our core values. Our ultimate parent company (The Dow Chemical Company) is signatory to the United Nations Global Compact and we are committed to combatting slavery and human trafficking in our own business and supply chains.

### **Dow Chemical Company Limited's Organization:**

Dow Chemical Company Limited is a UK incorporated subsidiary of The Dow Chemical Company (Dow), a U.S. incorporated company. Dow Chemical Company Limited is the parent company of UK subsidiaries - Dow Chemical Services UK Limited and Dow Services Trustees UK Limited. Dow is a global leader in the chemical industry. It's market-driven, industry-leading portfolio of advanced materials, industrial intermediates, and plastics businesses deliver a broad range of differentiated technology-based products and solutions for customers in high-growth markets such as packaging, infrastructure, and consumer care. Dow is a subsidiary of DowDuPont (NYSE: DWDP), a holding company which comprises Dow and E.I. du Pont de Nemours & Company (DuPont) which merged effective 31 August 2017 with the intent to form three strong, independent, publicly traded companies in agriculture, materials science and specialty sectors.

### **Dow's Supply Chains**

Dow's supply chain consists of more than 10,000 active suppliers around the world and more than 48,000 within the wider Dow Group. This supply chain is managed by our Group Procurement which operates as a single global function, structured across all business lines. We develop and implement best-fit strategies for each category to deliver maximum value from the supply base in the areas of cost and risk management, sustainability, innovation, and growth.

## **Dow's Relevant Policies:**

Our commitment to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business is embodied in the following Group Policies and Codes:

- Group Human Rights Policy
- Group Code of Business Conduct
- Group HR and Employment Policies; and
- Group Procurement Policies including:-
  - Supplier Code of Conduct
  - Dow's "Expectations of Suppliers" statement

## **Dow's Due Diligence Processes for Slavery and Human Trafficking**

### **Suppliers**

- Our Supply Chain Transparency and Supplier Code of Conduct specifically address this aspect. The Supplier Code of Conduct is communicated to all current and new direct suppliers and the majority of our purchase orders and contract templates have been updated to include compliance as a contractual requirement.
- Dow expects suppliers to implement systems and controls to promote compliance with applicable laws and the principles set forth in this Code, including policies, training, monitoring and auditing mechanisms. Suppliers also should apply these or similar principles to the subcontractors and suppliers they work with in providing goods and services to Dow. Dow reserves the right to assess and monitor suppliers' compliance with this Code. Suppliers who are not in compliance with this Code are expected to implement corrective actions or may not be considered for future business.
- We audit significant direct suppliers according to our business requirements. We have begun to evaluate whether to require compliance certifications, self-assessments and/or compliance audits.
- We have a helpline (telephone and web-based is available in multiple languages) which is available to all employees and third parties, which can be used to seek guidance on specific situations, report violations of Dow's Code of Business Conduct, including our Human Rights Policy and Supplier Code of Conduct or other unethical business practices. Calls may be made anonymously in most countries and callers are protected from retaliation.
- The outcomes of our programmes are generally communicated via our annual sustainability report.

### **Employees**

The principles of human rights are woven throughout our employee Code of Conduct. All employees of Dow and its subsidiaries, including those with direct responsibility for supply chain management, are expected to know and abide by this Code. Rigorous training on the content and application of the Code is mandatory for each and every employee, and each employee must

periodically acknowledge that they have read and agree to comply with the Code. Dow takes seriously and fully investigates all potential legal or Code violations, in a respectful, confidential and fair manner and takes action consistent with the severity of the violation.

*This statement has been approved by the Board of Directors of Dow Chemical Company Limited. It will be reviewed, updated and approved annually.*



**Andrew Jones**

**Chairman of the Board**

**Dow Chemical Company Limited**

**20 June 2018**