

# **DOW EUROPE GMBH**

## **Modern Slavery Act Transparency Statement 2019**

### **Introduction**

Dow Europe GmbH makes this statement pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes the slavery and human trafficking statement of Dow Europe GmbH for the financial year ending 31 December 2018. This statement delineates the actions Dow Europe GmbH has taken during the period to identify potential modern slavery risks in its business operations and the steps implemented which are aimed at ensuring there is no slavery or human trafficking in its supply chains. Respect for people is one of our core values. Our ultimate unlisted 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 its own business and supply chains.

### **Dow Europe GmbH's Organization**

Dow Europe GmbH is a Swiss incorporated subsidiary of Dow Inc. (Dow) through Dow Inc's ownership of The Dow Chemical Company (TDCC), both being U.S. incorporated companies. Dow Europe GmbH has a consignment manufacturing agreement with its UK affiliated company, Dow Chemical Company Limited.

Dow is a global leader in the chemical industry. Its 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.

During 2018, TDCC was a subsidiary of DowDuPont Inc (NYSE: DWDP), which was a holding company comprising The Dow Chemical Company and E.I. du Pont de Nemours & Company (DuPont). On 1 April 2019, DowDuPont Inc. completed the previously announced separation of its materials science business by way of a share distribution of common stock in Dow Inc. Dow Inc. is now an independent, publicly traded company (NYSE: DOW). As a result of the separation, Dow Inc. became the direct parent company of The Dow Chemical Company ("TDCC").

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

Dow's supply chain consists of more than 10,000 active suppliers around the world. 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
- 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 Supplier Code of Conduct (SCC) and "Expectations of Suppliers" statement specifically address this aspect. The SCC 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 (phone and web-based available in multiple languages) which is available to 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 Managing Directors of Dow Europe GmbH. It will be reviewed, updated and approved annually.***



Neil Carr  
Chairman of the Managing Directors  
Dow Europe GmbH  
17 June 2019