

# DOW EUROPE GMBH

## Modern Slavery Act Transparency Statement

### 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 2024. 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 indirect subsidiary of The Dow Chemical Company (TDCC) and TDCC is a direct wholly owned subsidiary of Dow Inc. ("Dow"). Both TDCC and Dow are US 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.

### Dow's Supply Chains

Dow's supply chain consists of several thousands of suppliers around the world/globally. This supply chain is majority managed by Purchasing 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 Dow Inc. group Policies and codes:

- Human Rights Policy
- Dow Inc. Code of Business Conduct (Code)
- Conflict Minerals Policy
- HR and Employment Policies
- Procurement Policies including
  - Dow Code of Business Conduct for Suppliers ("SCC")
  - Dow's "Expectations of Suppliers" statement

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

### **Suppliers**

- Our Dow Code of Business Conduct for Suppliers 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 the SCC, 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 the SCC. Suppliers who are not in compliance with the SCC 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 make evaluations whether to require compliance certifications, self-assessments and/or compliance audits
- Third parties acting on Dow's behalf are subject to periodic intensive assessments to monitor further their compliance with the SCC
- Dow has a robust global risk-based due diligence process established to conduct due diligence on third parties based on risk-profile. All employees serving as relationship managers to third parties intermediaries are required to fully and timely comply with this due diligence process, which is a mandatory process and must be completed prior to establishing or renewing business arrangements. The results are used by Dow to determine the next steps, from mitigation plans up to the non-start or non-continuity of the business relationship.
- 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 the Code including our Human Rights Policy and the SCC or other unethical business practices. Calls may be made anonymously in most countries and reporters are protected from retaliation.
- The outcomes of our programmes are generally communicated via our annual [Environmental, Social and Governance \(ESG\) Report](#)

### **Employees**

The principles of human rights are woven throughout our Code. 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. Annual training on the content and application of the Code is mandatory for each and every employee, and each employee must also 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.*

### **Chairman of the Managing Directors**

**Julia S. Schlenz**  
**Dow Europe GmbH**  
**12 June 2025**

