



The Dow Chemical Company

Code of Business Conduct for Suppliers

This Code of Business Conduct for Suppliers sets forth basic principles for supplier conduct when working with Dow. Dow is committed to these principles and expects its suppliers to be as well.

HUMAN RIGHTS & LABOR: Respect for People is a core Dow Value. As signatories of the UN Global Compact, we adhere to these principles and expect our suppliers to respect the human rights of their employees and treat them fairly, in accordance with all applicable laws.

Respect Freedom of Association and Collective Bargaining: 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.

No Forced and Compulsory Labor: Suppliers will not use forced or involuntary labor, including prison labor, indentured labor, bonded labor or slave labor.

No Harassment and Abuse of Labor: Suppliers will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment or any other form of abuse, and will comply with all applicable laws on harassment and abuse of employees.

No Child Labor: Suppliers will comply with all applicable child labor laws.

No Discrimination: Suppliers will not discriminate in any condition of employment on the basis of race, color, national origin, sex, religion, age, disability, HIV/AIDS status, trade union membership, sexual orientation or any other personal characteristic unrelated to job performance, and will comply with all applicable employment discrimination laws.

Appropriate Work Hours and Wages: Suppliers will comply with all applicable laws on work hours and overtime, as well as all applicable laws on wages and benefits.

Conflict Minerals Sourcing: Supplier will not source tin, tantalum, tungsten or gold (the "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. Supplier commits to abide by all applicable laws and regulations related to Conflict Minerals and agrees to provide all necessary information requested by Dow concerning products supplied by Supplier to enable Dow to complete its reasonable country of origin inquiries and due diligence with respect to Conflict Minerals.

ENVIRONMENT, HEALTH & SAFETY: Dow's commitment to sustainability includes efficient use of resources, respect for the environment and safe and healthy workplaces. Dow is committed to Responsible Care® and expects its suppliers to make similar commitments to continuously improve their environmental, health and safety performance.

Respect the Environment: Suppliers will comply with all applicable environmental laws. Supplier will have systems in place to ensure safe management of waste, air emission and wastewater discharges. Dow will favor suppliers who seek ways to minimize the use of nonrenewable resources, use all resources more efficiently and minimize the environmental impact of their operations.

Protect Health and Safety: Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, training, work procedures and personal protective equipment. Suppliers will comply with all applicable workplace health and safety laws.

ETHICS & LEGAL REQUIREMENTS: Dow expects its suppliers to conduct their business as Dow strives to conduct its business: ethically and in compliance with the law.

Avoid Conflicts of Interest: Suppliers will avoid any interaction with a Dow employee that may conflict, or appear to conflict, with that employee acting in the best interests of Dow. This includes offering payments or employment opportunities to Dow employees.

No Bribery: Suppliers will not engage in any form of commercial bribery or otherwise offer any incentive 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 dealing with the bribery of government officials.

Fair Competition: Suppliers will comply with all applicable laws regarding fair competition and antitrust.

Accurate Accounting and Business Records: Suppliers will keep – and provide to Dow upon request – accurate records of all matters related to the supplier's business with Dow.

Protect Information: Suppliers will protect Dow's confidential information and act to prevent its misuse, theft, fraud or improper disclosure. Suppliers must take all due care in handling, discussing or transmitting sensitive or confidential information that could affect Dow, its employees, its customers, the business community or the general public.

COMPLIANCE: In addition to the legal standards mentioned in this Code, suppliers will comply with all other applicable laws in the provision of products or services to Dow. 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 should also 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 they may not be considered for future business.

REPORTING MISCONDUCT: Suppliers who believe that a Dow employee or anyone acting on behalf of Dow has engaged in illegal or otherwise improper conduct with respect to their business with the supplier should report the matter to Dow. Suppliers should also report any potential violation of this Code. Reports may be made through the Dow Ethics Line at www.dowethicsline.com. A supplier's relationship with Dow will not be affected by an honest report of potential misconduct.

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