

DOW CORNING CORPORATION

Modern Slavery Act Transparency Statement

Introduction:

Dow Corning makes this statement pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes the slavery and human trafficking statement of Dow Corning Corporation and its subsidiaries (Dow Corning) for the financial year ending 31 December 2016. This statement delineates the actions Dow Corning has taken during the period to identify potential modern slavery risks in its business operations and the steps implemented aimed at ensuring there is no slavery or human trafficking in its supply chains. Respect for people is one of our core values. Our 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 Corning's Organization:

Dow Corning Corporation is the parent of the Dow Corning Group and is a US incorporated company. Dow Corning Corporation became a wholly owned subsidiary of The Dow Chemical Company on 1 June 2016. Dow Corning is a global leader in silicon-based technology and innovation supplying silicones into a variety of diverse applications including Automotive, Beauty & Personal Care, Construction, Electronics, Healthcare, Household Care, Infrastructure, Manufacturing, Paint & Inks, Paper, Power and Utilities, Solar and Textiles. Dow Corning has 25 manufacturing sites located across 9 countries and has approximately 10,000 employees worldwide. Dow Corning Limited is the UK subsidiary of Dow Corning Corporation and operates a large production plant in Barry, UK. Dow Corning Pension Trustee Limited is a UK subsidiary of Dow Corning Limited.

Dow Corning's Supply Chains

Dow Corning'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 Corning'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 Corning Supply Chain Transparency

Dow Corning's Due Diligence Processes for Slavery and Human Trafficking

Suppliers

- Our Supply Chain Transparency and Supplier Code of Conduct 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, the Supplier Code of Conduct and Supply Chain Transparency and 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 Corning Corporation. It will be reviewed, updated and approved annually.



Mauro Gregorio
Chief Executive Officer & President
Dow Corning Corporation
22 June 2017