

NUTRITION · HEALTH · SUSTAINABLE LIVING

DSM Code of Business Conduct



DSM

BRIGHT SCIENCE. BRIGHTER LIVING.

DSM Code of Business Conduct

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DSM Code of Business Conduct

Dear colleagues

This document, our Code of Business Conduct, defines how we do business and create value for our stakeholders - customers, employees, shareholders and society at large - across three dimensions simultaneously: People, Planet and Profit. It forms the basis for our company's ethical business behavior. Our corporate strategy builds on this foundation.

At DSM, we have a long and rich heritage. For more than 100 years, DSM has been on an amazing journey. We have our origins as a Dutch coal mining company. We have evolved over the years into a bulk chemical company and now into a global, purpose led and performance driven, science-based company active in Nutrition, Health and Sustainable Living.

A short decade ago the general belief was that as a company you either focused on driving profit or saving the planet - but not both. In the past years we have proved that doing well financially can go hand-in-hand with doing well for the world. In 10 years from now, good financial returns will go together with purpose.

In 2016, the United Nations launched the Global Goals for Sustainable Development (SDGs), a roadmap to a more environmentally and socially conscious and responsible world by 2030. At DSM, we believe that companies have a key role to play in achieving the SDGs. We believe that our competences in Nutrition & Health, Climate & Energy, Resources & Circularity contribute in a positive way toward achieving the SDGs.

To successfully deliver upon our purpose, our strategy and targets, it is important for all of you to understand and feel why and how DSM wants to do business. This code is therefore essential: you have to know it and live it. If you have a question, you need to ask. If you have any concerns or see a violation: please report it using one of the options as described in the Code.

On behalf of the Executive Committee,

Geraldine Matchett and Dimitri de Vreeze
Co-CEOs

January 2021

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Our purpose

For more than a decade, we have distinguished ourselves by embracing sustainability and providing value for all our stakeholders across the three dimensions of People, Planet and Profit. We have taken a decisive next step as a purpose led company, contributing to a brighter world for all with our science-based solutions. Our purpose is therefore fully anchored in our Strategy 2021: Growth & Value - Purpose led, Performance driven.

Our purpose is to create brighter lives for all

We use our bright science to create solutions for people today and generations to come. We use our scientific competences to deliver transformation at scale for as many people as possible, within the constraints of the world's resources. We aim to redefine how we live and work in order to create a fairer, more prosperous and more sustainable society.

We aspire to be a company for all, creating value for all our stakeholders — customers, employees, shareholders and society at large — and building a stronger legacy and a brighter future for generations to come.

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Our culture

Our DSM culture builds on our strong heritage to guide us to our future. It enables us to grow and flourish as a business and as people, and we create it together through everything we say and do, and every story we share.

This is the DSM culture compass. It's a navigational tool that helps us see the future we're aiming for: creating value for our customers and shareholders, for our communities and wider society, and for each other.

The compass shows us our cultural direction and destination, while allowing each of us to find our own ways to bring it to life in our daily role, wherever we are and wherever we work. It's a simple framework to help us do more of what we already do well, and improve those cultural areas where we can be stronger.

The compass also reflects our purpose-led, performance-driven strategy. Our purpose of creating brighter lives for all sits at the heart of the compass – it inspires everything we do. We deliver performance by being more of who we are, and by taking decisions every day that show what we stand for.

The six outer elements of the compass help us define the culture we want to build, and guide our day-to-day interactions and decisions. They truly come to life when we combine them in ways unique to our own role. Let's explore them.

Courageous - Being courageous means we are willing to make tough decisions, own our actions, embrace new ideas, take a stand when needed, and support others to do the same.

Caring - Being caring means we look out for the people and environment around us, go the extra mile to value and strengthen our diverse relationships, and take care of others and ourselves, so that everyone can be their best.

Collaborative - Being collaborative means we always look for the best ways to work and innovate together and with others, to listen and find common ground, and to apply our knowledge and skills in an inclusive and agile way.

Taking responsibility - Taking responsibility means we act ethically and with integrity, always learning and improving, willing to be held accountable for our performance and the safety and wellbeing of the people and communities around us.

Championing sustainability - Championing sustainability means we improve the quality of people's lives by embedding sustainability in all that we do, applying our scientific know-how to address the challenges of today and tomorrow.

Delivering value - Delivering value means we use our speed, expertise and innovation to deliver results, meeting the needs and earning the trust of customers, employees, shareholders, communities and wider society.



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Our business principles

The business principles of the DSM Code of Business Conduct contain important do's and don'ts for our day-to-day activities and support how we will achieve our purpose and strategy.

People: the human dimension

Respect for people, recognition of their fundamental rights and a belief in the power of their diversity are key principles at DSM. Our people and organizational policy is based on openness, fairness and trust and is aimed at promoting personal growth and integrating different views. Safety and health are our top priorities. In the broader context of our business activities, it means that we acknowledge and respect fundamental human rights as defined by the United Nations.

DSM business principles on this dimension:

- *Diversity and non-discrimination* – We create an environment where people feel a sense of belonging and where uniqueness is respected and valued. Therefore we strive for a diverse workforce. We are an equal opportunity employer and recruit, employ and promote employees on the sole basis of their qualifications and abilities for the work to be performed. We do not tolerate any discrimination or harassment on the basis of race, ethnic background, nationality, age, religion, gender, sexual orientation or disability.
- *Open communication and employee involvement* – We create an atmosphere of candor and stimulate openness and accountability by involving our employees in the development and execution of our business objectives. We encourage and provide channels for employee feedback. We respect the right of our employees to freedom of association and collective bargaining.
- *Health and safety* – We aim to create an incident- and injury-free work environment and to prevent the occurrence of occupational illness and health problems associated with our activities. At all levels, we expect our employees and contractors to play an active role in identifying and rectifying unsafe situations.
- *Employee development and fair remuneration* – We support our employees in their growth and personal development by offering them training, coaching and mentoring. We invest in the knowledge and skills of our employees on an ongoing basis to support their long-term employability. We pursue a fair and competitive remuneration policy with due recognition for performance.
- *Protection of personal information* – We respect the privacy of our employees and those of our business partners, and we store and use personal data in accordance with regulations and good practices with regard to privacy protection.
- *Forced labor, modern slavery and child labor* – We do not use forced labor or child labor, or demand that our employees work excessive hours. In cases where employees are asked to work overtime, their extra work is compensated in line with local legislation. We are not engaged in human trafficking, servitude or slavery.

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Planet: the environmental dimension

At DSM, we know that we can only create brighter lives for all if we take responsibility for the environment, and we are convinced of the importance of sustainable entrepreneurship and good corporate citizenship. This means that we strive to conduct our activities in a way that meets today's needs without compromising the ability of future generations to meet their needs.

DSM business principles on this dimension:

- *Low-carbon innovations* – In deciding what new products we want to make, what new production processes we want to use, and what new technologies we want to develop, we are guided by our commitment to sustainability. We consider the transition to a low-carbon economy both a moral responsibility and an opportunity. We aim to deliver innovations that improve the environmental footprint of our business and its value chains by introducing circular/bio-based value chains.
- *Water security* – To safeguard sustainable access to adequate quantities of acceptable quality water for sustaining livelihoods, human wellbeing, and socio-economic development, we are committed to the responsible use of water resources in the light of an increasing water scarcity around the world.
- *Energy, raw materials and continuous improvement* – We continually evaluate and improve our products, working methods, production processes and services in order to ensure they are safe and acceptable from the point of view of our employees, our customers and other stakeholders. We make an ongoing effort to minimize the use of raw materials and energy and to replace them with renewable materials or energy where feasible.
- *Product Stewardship* – In accordance with the principles of product stewardship, we identify the risks and environmental impact attached to our products during our production processes as well as during their entire lifecycle, and look for opportunities to reduce these. In this context, we share relevant knowledge, expertise and experience with our suppliers, customers and other parties. We provide our customers and the general public with clear information about the environmental and safety aspects of our products and production processes.
- *Quality* – We aim to create a positive customer experience by assuring quality of our operations and traceability in our supply chain. Our employees understand their role and take their responsibility in delivering safe, high quality products with reliable service to our customers.

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Profit: the economic dimension

We seek to achieve long-term profitability and to contribute to the success of our customers, shareholders and other stakeholders by entering into partnerships with them and jointly creating brighter lives for all. All these partnerships are based on free, fair, transparent, ethical and legally compliant business practices, on which we seek to maintain a constructive dialogue with the community.

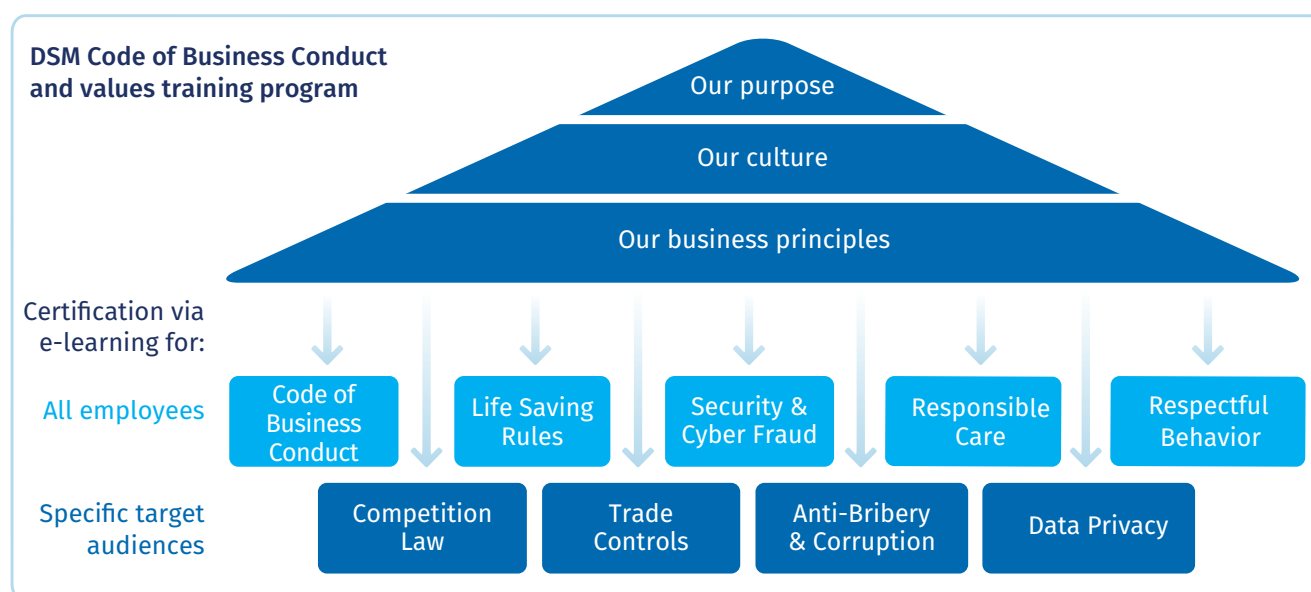
DSM business principles on this dimension:

- *Business integrity* – We conduct our business honestly, transparently and ethically. We abide by applicable laws and regulations. We refrain from any arrangement or transaction that is suspected to be used for illegal business practices or other violations of law.
- *Free and fair competition* – We value free and fair competition in all countries of the world. Therefore we comply with competition laws in all areas where we operate and have implemented strict policies in this respect.
- *Embargoes and trade law* – We respect applicable trade laws and restrictions as imposed by the United Nations or other national or supranational bodies or government, and we have implemented strict policies to ensure compliance therewith.
- *Bribery and corruption* - We refrain from any form of bribery and corruption including extortion and active or passive bribery. We do not give or accept any gift or favor that could compromise or raise doubts about the neutrality of the decisions made by our people or our business partners. We ensure that any commission payment, agent fee, etc., is based on a real, legitimate, documented service.
- *Conflict of interest* – Our employees avoid any conflict of interest between the company's interests and their private interests; and avoid any behavior that could raise doubts about their integrity or the integrity of the company.
- *Public dialogue* – We seek constructive dialogue with politicians and society to pursue our legitimate business interests. We base our arguments on facts and on scientifically sound, publicly stated positions. We do not make any payments or donations in kind to political parties or their institutions, agencies or representatives.
- *Use and protection of company property and information* – Our employees take good care of company property. They observe the Code of Conduct for Information Security regarding the protection of company information and the use of the company's information and communication systems. They respect the DSM-Rules on Inside Information and Insider Dealing regarding share price sensitive information.
- *Social media* - We aim to stimulate that our employees act as DSM ambassadors. When using social media in relation to DSM, we expect our employees to disclose their relationship to DSM and protect DSM's reputation by using common sense when posting.

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Implementation and compliance

The business principles of the DSM Code of Business Conduct serve as an umbrella for several other DSM requirements, supported by the Global Mandatory Values Training program to train the relevant people. Depending on the subject, this concerns all employees, or selected employees that have a specific role. It is every employee's personal responsibility to take part in these programs.



E-learning for all employees: Code of Business Conduct, Life Saving Rules, Basic Course Responsible Care, DSM Security e-learning, and Respectful Behavior.

E-learning for specific target groups: Global Competition Principles and Practices, Global Trade Controls, Anti-Bribery and Corruption, General Data Protection Regulation Overview.

We ask our suppliers to adhere to the DSM Supplier Code of Conduct, which contains the business principles that are applicable for our supply chain.

In addition to our Code of Business Conduct, the Corporate Policies, Requirements and Directives are applicable, in which more detailed guidance is given. It is a management responsibility to ensure that these are implemented wherever applicable.

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Reporting concerns and violations

When questions or concerns arise about the implementation of the Code, employees should raise this within their own working environment or organization. Open discussion is the basis for a good working environment and finding the right answers together.

When concerns remain, employees should report the dispute, complaint, concern or breach to their direct manager, the higher management or their P&O manager.

If reporting a (suspicion of a) breach of the Code of Business Conduct or other regulations to their management is not possible (because it would be inappropriate or unfeasible); or if employees fear that such reporting may have repercussions for them; they can use the DSM Alert System (DSM.Alert@dsm.com). Employees who raise concerns in good faith will be protected from retaliation.

Visit our DSM Code of Conduct intranetsite:

<https://dsm1234.sharepoint.com/sites/org-crm/English/corporaterequirements/bp/Pages/default.aspx>



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