

DSM's HUMAN RIGHTS POLICY

We believe that the basic rights and freedoms to which all people are entitled should be understood, respected, and promoted by all companies as the cornerstone of sustainable business. Only this way can we create brighter lives for all.

1. Our commitment

Respecting human rights is a prerequisite for doing business responsibly. DSM embraces the responsibility to respect human rights across all our operations worldwide, through our relationships with other businesses and in the communities in which we operate.

We are committed to respecting the human rights contained in the International Bill of Human Rights and the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. Moreover, we follow and implement the United Nations Guiding Principles for Business and Human Rights (UNGPs), we subscribe to the expectations expressed in the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and we are a signatory to the UN Global Compact. We expect our business partners to do the same.

DSM respects the human rights of workers. We offer fair remuneration and provide a safe and healthy working environment with working conditions in line with international standards. We commit to the ILO four core labor standards: Freedom of association and the right to collective bargaining; the elimination of all forms of forced or compulsory labor; the effective abolition of child labor and the elimination of all forms of discrimination in respect of employment and occupation.

We act in line with international standards such as the International Labor Standards on Working Time, the United Nations Women's Empowerment Principles, the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, the Children's Rights and Business Principles, and the Responsible Care Global Charter.

We acknowledge that we operate in countries where the implementation of international human and labor rights standards may differ with domestic law. In these cases, we will strive to adhere to whichever standard is higher, and in situations of conflict between international norms and domestic law, we will strive to honour the spirit of international human and labor rights.

2. Human Rights Due Diligence

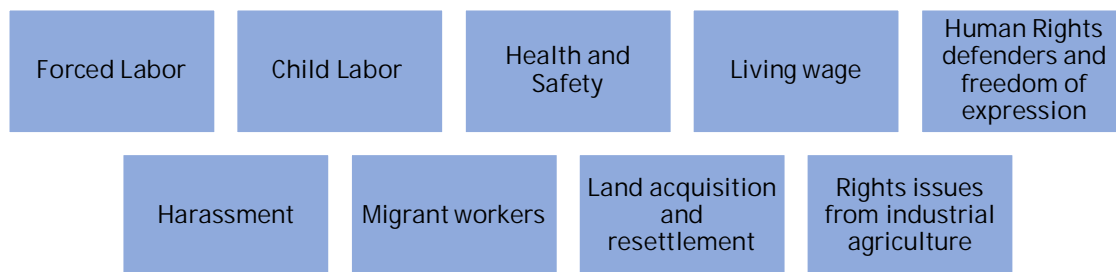
Following the United Nations Guiding Principles on Business and Human Rights (UNGPs), we have a responsibility to prevent, mitigate, and address adverse human rights impacts, and to use our leverage to encourage our suppliers and business partners to respect human rights issues.

We take a systematic and proactive approach to respect human rights. In the following paragraphs, we will explain how we assess potential human rights impacts, how we integrate and act on findings, how responses are tracked and monitored, and how we communicate on our human rights efforts.

2.1 Assessment

Our business covers several sectors, diverse supply chains and activities all over the world. We perform assessments on impacts on our own activities and throughout our value chain.

We have started to structurally identify human rights risks for our own operations, our supply chain and within our markets. We did this by looking at severity (scale, scope, irremediability) and likelihood, following the framework set by the United Nations Guiding Principles. This has resulted in the following list of salient issues, in no particular order:



Furthermore, we assess suppliers for possible human rights impacts as part of our Sustainable Procurement Program (SPP) and audits carried out by Together For Sustainability and Sedex.

On top of our audits, we have started using Human Rights Impact Assessments (HRIAs) on our own operations. This allows us to keep defining our salient human rights areas and provide feedback on how we can further improve our efforts. For instance, when acquiring property or leasing land, we make sure to identify and engage with land rights holders and local communities. In this process, we particularly take care to involve potentially affected vulnerable or marginalized groups under the principle of free, prior, and informed consent (FPIC).

2.2 Integration

DSM's commitment to respect and promote human rights is integrated into various operating policies. We will exercise our leverage in order to address an adverse human rights impact.

All DSM employees are expected to follow the DSM Code of Business Conduct, which is available in seven languages on the company website. Employees receive regular training on values and business principles per the framework requirements.

We also set clear expectations on the businesses we engage with to prevent potential risks from becoming reality, as laid out in the DSM Supplier Code of Conduct. Category managers are trained to educate suppliers on our Supplier Code of Conduct and have been trained to know how to act when suppliers are not compliant.

We have created a human rights roadmap to ensure that respecting human rights is integrated throughout our business and extended to our value chain. We will support our operations in converting this policy and roadmap into practical tools by developing relevant human rights guidelines. We will continuously update these guidelines based on revisions and stakeholder engagement.

2.3 Monitoring

Through our operational audit procedures, we regularly monitor if DSM's codes and policies are followed within our own operations.

In our nutrition businesses specifically (including our UK and Australian operations), we are audited on our compliance by our customers via the Supplier Ethical Data Exchange (SEDEX) platform. This platform is used to monitor and track social and environmental performance. To ensure compliance, DSM sites are checked every three years by external auditors using the Sedex Members Ethical Trade Audit (SMETA) process.

We actively monitor our supply base via supplier contacts/visits, sustainability assessments, and quality and sustainability audits on site. DSM expects our suppliers to adhere to our Supplier Code of Conduct and to have processes in place to remediate any human rights impacts they cause or contribute to.

2.4 Communication

Human rights impacts are not static but ever-evolving. We recognise that doing business with respect for human rights is an ongoing process that requires continuous learning, transformation, and collaboration. We will therefore regularly review and update our salient human rights issues and any resulting changes to what we do.

We will regularly report on the progress on our human rights roadmap through our website and/or our Integrated Annual Report.

3. Grievance mechanisms and remedy

DSM is committed to providing our stakeholders with various means of reporting (potential) human rights violations. We believe that having proper grievance mechanisms in place is crucial to better identify and address (potential) violations at an early stage and act accordingly. We encourage our employees to raise any concerns – including human rights issues – to their managers, colleagues in Human Resources or trusted representatives. Where this is not considered appropriate, complaints can directly be made to the DSM Alert Officer. Under our whistle-blower policy, the Alert mechanism is available to all stakeholders, internal as well as external, who wish to voice a concern regarding breaches of our Code of Conduct or any of our policies.

People wanting to voice their concern should be able to do so freely and without retaliation. We want to emphasize that retaliation against a person for reporting their grievance is a serious violation of our values and way of working. Should this occur, the violator will be subject of appropriate disciplinary sanctions.

We are continuously working to improve our capacity to identify, investigate, and take appropriate corrective action should illegal practices or violations of adopted policies occur. Therefore, we cooperate with all legitimate remediation efforts, such as administrative or judicial processes.

4. Stakeholder Engagement

DSM is fully aware that identifying human rights risks and developing a robust due diligence process requires ongoing improvement. Moreover, human rights are not a topic we can address alone. We need to work with multiple internal and external stakeholders such as governments, NGOs, employees, suppliers, customers and communities. Together, we can exchange knowledge, build leverage and address human rights that may be at risk. We will keep engaging

with stakeholders and act on findings so that we can address human rights in line with our learnings.

We believe human rights defenders play a critical role in drawing attention to issues that may otherwise remain uncovered and strive to cooperate with our stakeholders to safeguard human rights defenders' freedom to let their voices be heard.

DSM aims to be as transparent as possible to its stakeholders, and thinks it is important to regularly engage with stakeholder groups on the topic of human rights. In order to leverage our potential positive impact on human rights, DSM is constantly seeking opportunities to support human rights by engaging and collaborating with like-minded organizations that contribute to our purpose of creating brighter lives for all.

5. Our governance

The day-to-day responsibility for human rights at DSM sits with our Executive Vice President People & Organization (EVP P&O), providing periodic updates and reports to our Executive Committee. Our Human Rights Steering Committee is made up of senior representatives (People & Organization, Sustainability, Legal, Procurement and Operations) and is responsible for defining our strategy and framework for managing human rights issues. Each of these departments is further represented in the human rights working group, responsible for the day-to-day implementation of our respect for human rights. Every part of the business has a clearly defined responsibility to uphold their commitment to and contribution towards respecting human rights.

This public commitment has been developed according to the UN Guiding Principles on Business and Human Rights (UNGPs) and the UNGP Reporting Framework. DSM will track and publicly report its progress on an annual basis.