

MODERN SLAVERY STATEMENT 2023

Preventing all forms of slavery in our business & supply chains

In the context of the provision of the UK Modern Slavery Act 2015, The Australian Modern Slavery Act 2018 and the California Transparency in Supply Chains Act, 2012 , DSM explains in this statement our efforts to identify, assess and manage the risks of modern slavery and human trafficking within our business and our supply chains.

Our commitment

Forced labour refers to any form of indentured servitude such as the use of physical punishment, confinement, threats of violence as a method of discipline or control such as retaining employees' identification, passports, work permits or deposits as a condition of employment.

Our Code of Business Conduct ('the Code') explicitly mentions that 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.

Our Supplier Code of Conduct reflects our commitment to act ethically and with integrity in our business relationships and the commitment we expect our suppliers to make to do the same. We specifically require our suppliers not to be involved in human trafficking and the use of slavery, forced labor or child labor and to act in line with Convention 138 (Minimum Age) and Convention 182 (Worst Forms of Child Labor) of the International Labor Organization. This means that we require to directly address and prohibit practices that are well known to contribute to the risk of modern slavery.

Risk assessment and audits of own operations and suppliers

Our structure for managing risks is based on a three-lines model (see also Risk management). Line management within the business units acts as the first line. Corporate Group Functions such as Risk Management and Internal Control acts as the second line assessing the effectiveness of risk management and internal control at both unit and corporate level. Corporate Operational Audit (COA) acts as the third line. The scope and frequency of COA audits is determined by ranking the auditable units according to the scale of their risk exposure, using a set of defined characteristics.

Own Operations

Specifically in our nutrition cluster (covering our UK and Australian operations), we are audited on our compliance by our customers via the Supplier Ethical Data Exchange (SEDEX) platform, which includes forced labour. This platform is used to monitor and track social and environmental performance. The Self-Assessment Questionnaire (SAQ) looks at four core pillars in the areas of Labor Standards, Health and Safety, Environment and Business Integrity. To ensure compliance, DSM sites are checked every three years by external auditors using the Sedex Members Ethical Trade Audit (SMETA) process. The findings are closely monitored, and non-compliance rapidly remediated through the introduction of appropriate corrective actions.

Supply Chain

We assess our suppliers through EcoVadis – a recognized provider of corporate social responsibility ratings. This assessment starts with an overview of the supplier’s sustainability performance to determine their risk category.

EcoVadis assessment focuses on 21 criteria, grouped on four themes – Environment, Labor & Human Rights, Ethics and Sustainability Procurement. It starts with EcoVadis sending a customized web-based questionnaire to suppliers based on their industry, size and country (in 11 languages). Each supplier then responds with supporting evidence for its answers. We audit our first tier suppliers on sustainability (including forced labour risks) via Together for Sustainability (TfS). More information on DSM’s 2022 supplier sustainability evaluation and DSM’s sustainable procurement plan can be found in our annual report as published on our company website.

Training

All DSM employees are expected to follow the Code of Business Conduct, which is available in seven languages on the company website. They receive regular training on values and business principles per the framework requirements. Purchasers are also trained on how to educate suppliers on Supplier Code of Conduct and how to act when suppliers are not compliant.