Taxation at DSM

DSM believes a responsible approach to tax is an integral part of doing sustainable business in a robust, well-functioning society. Income from direct and indirect taxation, generated as a result of the vigorous economic activity of companies like DSM, is a primary source of revenue for public exchequers.

As such, tax is a subject relevant for society at large while also more and more complex.

The way that companies such as DSM contribute to society through (direct and indirect) taxes, duties and other payments to governments is not always easy for non-specialists to understand; the relevant information is often spread across various resources including annual and quarterly reports and other publications. This paper brings together all the relevant information that DSM makes public on taxation, from policies to payments, in one central resource.

It should be evident that DSM’s contribution to society extends beyond the topic of taxation as covered in this paper. DSM’s strategy addresses the main important societal trends and has especially strong alignment with five of the 17 United Nations Sustainable Development Goals (SDGs also referred to as global goals), which set out the strategy for the world. In this way the growth and success of DSM benefits all stakeholders. More information can be found in the Royal DSM Integrated Annual Report 2019.
Tax policy

DSM believes that a responsible tax approach is an integral aspect of doing sustainable business. DSM views the fulfillment of its tax obligations as part of creating long-term value for all stakeholders.

DSM’s tax position is consistent with the normal course of its business operations and reflects the corporate strategy as well as the geographic spread of its activities. It strives to be compliant with national and international rules and best-practice guidelines (such as the OECD Guidelines for Multinational Enterprises) and to be in line with the arm’s length principle.

DSM supports the idea of a global solution for fair tax policies and systems. Thus, DSM closely monitors and provides input on the OECD initiative on Base Erosion & Profit Shifting, including topics such as country-by-country reporting.

Many governments have updated or are in the process of updating the transfer-pricing documentation requirements, including country-by-country reporting to the tax authorities. The country-by-country report for 2017 & 2018 is filed and procedures are set-up to ensure compliance with the new requirements and supporting documentation required in various countries. The company closely monitors related developments and will follow up on legislative proposals in this respect as applicable.

Rapidly increasing tax compliance is emerging from several angles, including, among others, the OECD, EU, and various countries.

DSM strives to promote resource efficiency and the reduction of greenhouse gas emissions as well as advocating for a shift to a low-carbon economy, which includes implementing a meaningful price on carbon. High-performance materials which improve energy efficiency in and lower emissions from the automotive, maritime and food sectors contribute to a more sustainable environment. In our Nutrition businesses, DSM is providing a full range of solutions to improve the global ECO footprint of food and animal meat production, including a reduction of GHG emissions.

DSM’s SDGs can be found beginning on page 13 of the 2019 Integrated Annual Report. DSM’s SDGs also contain tax elements. For example, Advanced Solar and biofuel solutions which contribute to the uptake and efficiency of renewable energy sources can provide tax credits in certain countries.

DSM believes its tax policy should also be in line with the new Corporate Strategy ‘Purpose Led, Performance Driven’. Our tax position is therefore consistent within the normal course of business operations. We do not seek nor apply aggressive tax planning.

DSM is transparent towards tax authorities in the countries in which it operates and fulfills all its tax obligations and ensures paying the correct amount of tax due. DSM does not support the use of artificial structures (tax havens) nor will we enter into tax avoidance activities.

DSM has fostered good working relationships with tax authorities in various countries, which has long-term benefits for both DSM and the authorities.

If possible, DSM seeks to get upfront certainty on tax positions from the tax authorities. This limits the potential for disputes at a later stage, and ultimately provides DSM with more clarity and assurance about its tax positions.

In the Netherlands, the home country, DSM concluded a so-called tax covenant (‘horizontal monitoring’) with the Dutch tax authorities.

This entails on the one hand that the tax authorities can rely on DSM to provide any relevant information upfront, which can then be discussed in ‘real time’.

On the other hand, DSM benefits from upfront information and clarity in advance on expectations and obligations as well as fewer after-the-fact checks.

Recently, an update of the horizontal monitoring regime has been announced by the Dutch Ministry of Finance. DSM is in close contact with the Dutch tax authorities on this topic.

The tax covenant applies to all Dutch taxes (e.g. corporate income tax, VAT, wage taxes and various other direct and indirect taxes) due by all DSM’s legal entities.

Thus, both DSM and the tax authorities benefit from having this covenant in place, which is founded on transparency, trust and mutual understanding. DSM looks to implement similar approaches in other countries.

Tax Digitalization Policy

DSM believes that digitalization will further improve making tax processes sustainable while creating value. Together with IT and a third-party advisor, DSM has developed a ‘tax IT roadmap’ for the coming years, defining several IT projects that will assist with the updated digital requirements of the various tax
authorities such as electronically filing tax returns. DSM Group Taxation is also moving towards a more digital and paperless platform in an ongoing approach to comply with the organization’s sustainable business policy.

Tax governance

DSM strives to be compliant with the letter and the spirit of the tax laws and regulations as regards its tax policy and practices.

DSM has a robust governance framework founded on DSM’s Articles of Association, the DSM Code of Business Conduct, the company’s Management Framework including Corporate Requirements and Directives, and its risk management system. DSM applies all 113 best practices of the Dutch Corporate Governance Code.

Proper organization, procedures and processes are in place at DSM between the tax team, the business, and other Corporate Staff, Shared Services and Functional Excellence departments. The aim is to create a strong interconnection to keep everyone aware of relevant tax legislation and to ensure compliance.

DSM identifies and discloses relevant regulatory risks, including taxation risks, plus related mitigation actions in its Integrated Annual Report (DSM Integrated Annual Report 2019). As part of the DSM risk management process, tax risks and incidents are also reported and discussed with the Audit Committee of the Supervisory Board. Both financial-related and non-financial risks are considered by the Audit Committee. Non-financial risks include amongst others risks related to people, organization, culture and operational and reputational aspects. Tax risks are also included in DSM’s Risk appetite overview in the Integrated Annual Report.

The existing Tax Control Framework is a tax risk management and control system, which enables Group Taxation to be aware of the worldwide tax risks for DSM. Compliance with both direct and indirect tax matters is monitored through this Tax Control Framework to achieve an effective, efficient and transparent tax function.

Group Taxation manages these risks. The key stakeholders in the Tax Control Framework are well-established and include: Supervisory Board, Managing Board, Executive Committee, Group Taxation, business, external auditors, as well as the tax authorities in countries where DSM is operating. Locally, tax risks are also documented and presented to the Regional CFO and relevant stakeholders on a quarterly basis.

DSM implemented an Internal Control Framework in 2018 with policies and procedures across all functions to identify, monitor, control and mitigate risks. The framework was approved by the CFO and shared with the external auditor. The control framework contains a description of the key tax processes risks and the internal control measures DSM has taken to mitigate the key risks. Tests are conducted annually to ensure tax risks are closely monitored.

Once reviewed, the Global VP of Taxes is responsible for presenting an annual Letter of Representation to the CFO to confirm the absence of material tax risks.

A global project was introduced in 2018 to enhance and upgrade existing tax processes within DSM. This project is ongoing and will transition all direct tax compliance monitoring to one global service provider, which also provides an IT solution for the storage of the tax data. Implementation began in 2018 and will continue into 2020.

External auditors verified that the financial statements prepared by DSM represent a fair picture of the financial position of the organization. In the context of the annual audit, the tax team discussed key transactions as well as any relevant correspondence with tax authorities with the external auditors.

DSM’s Managing Board is responsible for establishing the approach to taxation under the supervision of the Audit Committee of the Supervisory Board. All members of the Supervisory Board are independent in accordance with the Best Practice provisions of the Dutch Corporate Governance Code.
Tax in DSM’s stakeholder engagement

Taking part in strategic and proactive dialogue with key stakeholders helps DSM to deepen its insights into the drivers of its business and the needs of society across the world, and thus be ahead of competition in adjusting to changing demands. By working together, DSM and its stakeholders can create shared value and contribute to a more sustainable, prosperous and resilient world.

DSM’s stakeholder groups have been identified based on the influence they have on the company’s operations, as well as whether they are significantly affected by them.

DSM determines the materiality relevant to the company through a process of ongoing stakeholder engagement and lists them in the company’s Integrated Annual Report. DSM’s materiality matrix in 2019 represents the 15 material topics and their positioning as seen by the company’s stakeholders in the year and in alignment with the Corporate Strategy. As topics in the matrix have changed in 2019, Corporate income tax is now considered an integral part of the material topic “Business ethics and transparency”.

Graphic from DSM Integrated Annual Report 2019
Economic value generated and distributed in 2019

Economic value generated €9.0bn

DSM believes sustainable business growth is closely linked with robust societies and healthy economies – and vice versa. DSM is mindful of its responsibilities as a multinational company operating within and alongside society and addresses the most challenging societal issues with its business and operations.

DSM contributes to the economy of the more than 50 countries where it currently has operations with a total economic value generated of more than €9.0 billion in net sales.

In 2019, DSM posted an operating result of €1.075 billion. A regional split of the economic value generated is given in the charts to the right.

Economic value distributed €8.7bn

DSM’s contribution to society in terms of economic value distributed consists of various aspects, including employee benefits, goods and services purchased from suppliers, customs duties and other payments to governments including taxation.

The overall breakdown per category is shown in the chart to the right and further detailed on the following pages.
Economic value generated and distributed in 2019 (2)

Value distributed to employees: €1.8bn

DSM’s contribution to society includes the provision of employment to more than 22,000 people globally in areas including manufacturing, marketing and sales, logistics, research and development and administration.

Total employee benefit costs around the world amounted to €1.8 billion in 2019, of which around 38% went towards wage taxes and social security contributions. The uppermost charts on the right give a further breakdown of DSM’s spending on employment in 2019, the first chart by type of employee benefit, while the second gives the split per region.

Value distributed to suppliers of goods & services: €4.9bn

The external spend for DSM in 2019 amounted to €4.9 billion (related to goods and services captured in net sales, excluding capex) which also implies further (indirect) tax proceeds for governments. The third chart gives the split per region.

Value distributed in capex/investments: €623m

In 2019, DSM invested €623 million in capital projects around the world, the regional breakdown of which is given in the final chart. These investments have also led to considerable indirect economic benefits such as third-party employment and government revenues (an exact value for these indirect benefits is difficult to quantify and so is not included in this paper).
Economic value generated and distributed in 2019 (3)

Value distributed to capital providers: €1.1bn

DSM's capital providers (shareholders and creditors) provide funds to finance the asset base used to create economic value. In turn, these stakeholders receive annual dividend and interest payments from DSM which trigger withholding tax obligations. The total value of interest and dividends distributed to providers of capital in 2019 amounted to €1.1 billion.

DSM announced on 14 February 2019 a repurchase of shares with an aggregate market value of €1 billion, with the intention to reduce its issued capital. In 2019 DSM has repurchased 5.4 million shares for a total consideration of €600 million under this program. DSM intends to repurchase the remaining €400 million during the first half year of 2020, next to the usual repurchase programs which DSM executes from time to time to cover commitments under the share-based compensation plans and the stock dividend. For more detailed information see ‘Daily transaction details Share Repurchase Program announced 14 March 2019’.

Value distributed to philanthropy & sponsorships

DSM supports causes and initiatives that relate to its mission of using its Bright Science to create Brighter Living. It does so by providing products, expertise and funding. We also engage in philanthropic and sponsorship activities to the average yearly amount of approximately € 6 million. DSM is engaged in various cross-sector partnerships aimed at bringing innovative solutions for improved nutrition to as many beneficiaries as possible, such as with the UN World Food Programme and the Scaling Up Nutrition (SUN) Movement's SUN Business Network, as well as through its continued support of the now independent non-profit humanitarian nutrition foundation Sight & Life. The value to society of all these programs is not included in this amount.

Value distributed to governments in taxes: €1.0bn*

For 2019, the estimated total amount of taxes generated by DSM was around €1.0 billion (it should be noted that the values for e.g. property taxes and environmental taxes have not been included in this paper, which lead to a higher total tax outcome than this amount).

This value is further illustrated by tax type in the chart below. The vast majority of the taxes borne in 2019 are direct taxes, of which a significant part relates to taxes paid for DSM’s employees as wage tax and social security contributions (any other wage-related taxes paid directly by employees are not included in the current valuation). Indirect taxes, including VAT and customs duties, account for a further 11%.

The total income tax paid by DSM in 2019, including corporate income tax, dividend and withholding tax, amounted to €191 million. The level of DSM’s income tax payments reflects the geographic spread of its results over the years, which is among other things a result of acquisitions and divestments, loss positions and the application of tax regulations in countries where DSM operates. As a result, the relative contribution per region varies from year to year.

The actual amount of corporate tax paid in a particular year can differ from the accounting expense as reported in the company’s financial statement (2019: €152 million). Differences between the cash outflow and the expense charged are a result of elements such as tax losses in previous years, deferred tax, timing differences or uncertain tax position matters.

The tax accounting expense of €152 million for 2019 represents an amount of €0.88 per average ordinary share in circulation.

The allocation of the total €191 million cash tax paid by region / countries is presented in the below chart.

Europe is an important hub for DSM’s major business flows, contributing to 61% of the income tax payments. DSM employs around half of its personnel in Europe...
and undertakes a significant proportion of its investments, external spend, research and development activities and administrative activities in the region (being also the location of the corporate head office and a number of business group headquarters).

Americas continue to make contribution with around 22% of DSM’s total income tax payments being made in the region.

Asia/Africa amounted to around 17% of total income tax paid in 2019.

The 9 countries depicted in the inner circle of the below chart represent the largest cash tax payors in DSM. The other 41 countries in which DSM operates pay below €3 million in taxes each and are covered in ‘Other Countries’.
Effective tax rate

In the last 5 years, DSM’s continuing operations had an effective tax rate of between approximately 17 and 23%, which translates into an average yearly income tax expense of around €106 million. This effective tax rate is in line with that of peer companies.

The average tax rate presented in this paper is calculated based on the income statement as a weighted average of the tax rates in the jurisdictions where DSM undertakes its business operations.

Other effects refer to values including prior year adjustments, losses not recognized or expired and deferred taxes adjustments.

For the relationship between this effective tax rate and the income tax rate in the Netherlands, please refer to DSM’s Integrated Annual Report 2019, where all the usual IFRS taxation figures reported for the years 2018 and 2019 can be found.

The effective income tax rate on the adjusted result from continuing operations was 18.2% in 2019 (2018: 17.4%). The effective tax rate in 2018 was positively impacted by the geographic spread. Overall we expect the ETR for 2020 to be in the range of 18% - 20%.

**Starting point: average tax rate:**

<table>
<thead>
<tr>
<th>Effective tax rate</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Group average applicable tax rate</td>
<td>18.1%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tax effects of:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Tax rate changes</td>
<td>2.6%</td>
</tr>
<tr>
<td>Tax exempt income and non-deductible expenses</td>
<td>-1.5%</td>
</tr>
<tr>
<td>Other effects</td>
<td>-1.0%</td>
</tr>
<tr>
<td>Effective tax rate continuing operations</td>
<td>18.2%</td>
</tr>
</tbody>
</table>

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**DSM global presence**

- North America: 3,346 employees
- Europe: 9,668 employees
- Asia: 6,734 employees
- Latin America: 2,134 employees
- Rest of World: 292 employees

*These are the number of headcounts as per 31-12-2019.*
DSM takes an active role in promoting debate on the role of taxation and other economic instruments in supporting the transformation to sustainable solutions. DSM engages with stakeholders to progress this agenda in forums such as the World Economic Forum.

Such instruments could play a key role in encouraging a more balanced approach to the use of scarce resources, for example by internalizing the external costs of their use.

DSM is an advocate of the development and implementation of a global system to put a meaningful price on the use of carbon. This would provide an economic stimulus to reduce harmful emissions, whilst also providing an incentive for innovation in new technologies in the transition away from the use of fossil fuels to new low-carbon areas such as the bio-based economy. To encourage investments in low-carbon and carbon-free technologies, we use an internal carbon price of €50/t CO2eq in the valuations of key investment projects and in the Profit and Loss statements of the business groups for internal management reporting. This increases the visibility of, and encourages accountability for, the impact of carbon on the business. We also require business growth projects to be GHG-neutral or else be compensated for within the same business.

In 2019, DSM CEO Feike Sijbesma co-chaired of the High-Level Leadership Forum on Carbon Pricing and Competitiveness. The Commission addresses competitiveness concerns that have the potential to inhibit the worldwide uptake of carbon pricing. The Commission published its flagship report during the UNSG Climate Summit outlining the evidence on the effectiveness of a meaningful price on carbon to incentivize emissions reduction. At various events, including the WEF Annual Meeting in Davos and the UNSG Climate Action Summit, Mr. Sijbesma shared our approach on carbon pricing. He continued his call for businesses to implement an internal price on carbon and advocated for a meaningful price on carbon in the global financial system.

A complement to such an approach could be a reduction in taxes on labor while increasing those on the use of scarce resources. Shifting taxes from labor to resources would simultaneously stimulate the development of the circular economy (where products and systems are designed in such a way that they can be returned and the materials recycled, re-used or remanufactured, meaning that waste no longer exists but becomes the input for a new round of production) and a more conscious use of resources, whilst also stimulating job creation and flexibility on the labor-market.

DSM engages in dialogue with various partners and stakeholders on these topics including the World Bank, the Dutch think-tank Ex'Tax and the World Business Council for Sustainable Development (WBCSD). DSM has a long-term relationship with the WBCSD, in particular as regards the development of metrics to measure external impacts such as through Life Cycle Assessments.

DSM aims to be a front-runner in climate action. Our approach is to improve the impact of our own operations, enable our customers to do the same through our products and advocate for action on climate.
Group Taxation

All units within DSM are responsible for ensuring that they are compliant with their legal and tax obligations in accordance with the DSM Code of Business Conduct.

A global team of tax professionals advises the Managing Board, the Executive Committee and the business on the management of tax matters and tax risks. Tax is the ultimate responsibility of DSM’s Chief Financial Officer and is part of the finance function of the company.

The Group Taxation team creates awareness on the multiple tax subjects relevant to DSM as a global organization and operates in close co-operation with the business and other Support Functions and Functional Excellence departments within DSM, as well as with external tax advisors.

In meeting the company’s legal tax obligations, DSM’s global tax team operates with full integrity and professionalism.

DSM’s Group Taxation team of professionals has an international and diverse profile. As the international tax landscape is rapidly changing, DSM Group Taxation transformed its way of working into a functional approach. One of the key benefits of the functional way-of-working is that ‘capability and talent development’ can be properly captured. A Competence Leadership Team – CLT- was introduced in 2018 and continues to work effectively, leading the tax operations team. The CLT consists of leaders in (tax) Strategy, Regional Tax, Business Tax, Transfer Pricing, Customs, Indirect Tax, Tax Policies, Communication and M&A. This functional approach focuses on key competencies while also overseeing the tax operations team whose primary focus is on tax compliance. The CLT also facilitates a rotation between the different functional areas and stimulates the learning and growth of the DSM Group Taxation team. Moreover, it enables the tax team to efficiently ensure compliance and cover all relevant tax aspects of DSM’s business. The CLT is led globally by the Global VP of Taxes and meets monthly to provide updates on relevant tax matters.

In 2019, DSM Group Taxation introduced a series of live webinars that were presented to the global finance organization. These webinars included specific topics such as transfer pricing, tax control & accounting, customs, indirect taxes/VAT and M&A, and were presented by the responsible CLT member. With such a positive response, DSM Group Taxation will continue these webinars into 2019 and 2020 with updates to previously presented topics as well as new and relevant keynotes.

Part of the 2019 annual plan and in connection with the continuation of the ‘functional competence approach’, Group Taxation maintained RASCI’s for the main tax processes, embraced a ‘pro-active feedback culture’, enhanced the business partner role and enlarged the digital strategy.

Group Taxation aims to connect its tax competences with DSM’ life sciences and materials sciences businesses, regions and support groups, enabling purpose led solutions while performance driven, all in line with DSM’s strategy.

Main tasks and responsibilities

- Define the fiscal strategies and policies for DSM globally. This is an action that recurs annually; the Global VP of Taxes presents the tax strategy to the Executive Committee and the Audit Committee.
- Advise and support the Managing Board, the Executive Committee, the Support Groups, the business groups and their organizational entities, and the regions and their legal entities with regard to fiscal matters (i.e. via internal webinars).
- Advise and support relevant DSM legal entities with regard to the implementation of legal and organizational structures necessary to reach sustainable solutions balancing both business and fiscal needs.
- Manage tax audits and contact tax authorities when appropriate and conclude, if feasible, advanced tax rulings with them.
- Participate in (inter)national groups of experts to represent DSM’s interests.
- Set corporate requirements for the management of DSM’s legal entities.

Tax risk management

Tax risks are monitored through our Tax Control Framework, enabling that Group Taxation is aware of the worldwide tax risks for DSM. Internal procedures for specific risk areas for example include:

- Organizational: Group Taxation is fully involved in Corporate reorganizations and business restructurings to ensure these restructurings are in line with DSM’s Tax Policy;
- Operational: DSM regularly monitors that intercompany transactions are in line with our business;
• Compliance: DSM monitors the changes in tax legislation to ensure compliance within local jurisdictions. Furthermore, clear assignment of compliance responsibilities between Group Taxation and local management as well as involvement of local tax experts in order to ensure compliance with local tax obligations;

• Reputational: Clear disclosure of DSM’s tax position, for instance through the publication of this paper;

• People: DSM creates and maintains tax awareness within the organization through external webinars, e-learnings and manuals, as well as via the new Group Taxation webinars introduced in 2019;

• People: DSM places a strong focus on professional development of members of the Group Taxation department through quarterly town-hall meetings, in-house workshops, external trainings, webinars and e-learnings.
Preparation of this paper

DSM has published this paper as part of its commitment to clear and transparent reporting, continuing to build a sustainable business as a trusted partner for its various stakeholders.

The way that companies such as DSM contribute to society through (direct and indirect) taxes, duties and other payments to governments is not always easy for non-specialists to understand; the relevant information is often spread across various resources including annual and quarterly reports and other publications.

This paper brings together all the relevant information that DSM makes public on taxation, from policies to payments, in one central resource. The information presented relates to the consolidated level of reporting and is applicable to Royal DSM as well as its group companies included in the consolidated financial statements and excludes partners and associates. This paper has not been subject to a separate audit. DSM considers the paper as complying with the requirements of Paragraph 19 of Schedule 19 of the Finance Act 2016.

For the purposes of this paper certain figures are presented on a best estimate basis when calculating the total amount of tax generated and are specifically footnoted as such.

Moreover, certain taxes (e.g. property tax, and environmental tax) have not been included in the overall tax amount paid by DSM in 2019 contained in this paper.

In order to clearly understand the content of this paper, an explanation of the technical terms used in compiling this paper is given below. These are not detailed definitions, but rather to be used as guidance.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net sales</td>
<td>This comprises revenue generated by supply of goods and services, less discounts, VAT and other sales related taxes, and royalty income (in case of ordinary business). Data presented relate to continuing operations.</td>
</tr>
<tr>
<td>Operating profit</td>
<td>The company’s earnings from core business operations, also known as Adjusted EBIT (earnings before interest and tax). Data presented relate to continuing operations.</td>
</tr>
<tr>
<td>Employee benefits</td>
<td>These are defined as the total remuneration, in cash or in kind payable by an employer to an employee and also include wage taxes, employees’ social security contributions and post-employment benefits</td>
</tr>
<tr>
<td>Wage taxes</td>
<td>This includes payroll and employee taxes withheld from employee remuneration, and paid to governments</td>
</tr>
<tr>
<td>Capex / investments</td>
<td>Accounting capital expenditure relates to the purchase of intangible assets (excluding goodwill) and property, plant and equipment</td>
</tr>
<tr>
<td>Total tax generated</td>
<td>The value includes amounts to be paid to a government, whether by law or by agreement, including both direct and indirect taxes</td>
</tr>
<tr>
<td>Indirect tax</td>
<td>Taxes which are levied on consumption of specified goods rather than on income</td>
</tr>
<tr>
<td>Direct tax</td>
<td>Taxes generally paid directly to the government and for the purpose of this paper also includes income tax and employer wage taxes</td>
</tr>
<tr>
<td>Income tax</td>
<td>This includes any tax on the business calculated on the basis of its profits, plus withholding tax. The income tax paid may vary over the years.</td>
</tr>
<tr>
<td>Effective Tax Rate</td>
<td>The tax charge of an accounting period divided by the accounting profit before tax</td>
</tr>
<tr>
<td>Profit before tax</td>
<td>Accounting profit for a period before deducting corporate income taxes</td>
</tr>
</tbody>
</table>
Disclaimer

This document may contain forward-looking statements with respect to DSM's future (financial) performance and position. Such statements are based on current expectations, estimates and projections of DSM and information currently available to the company.

Examples of forward-looking statements include statements made or implied about the company's strategy, estimates of sales growth, financial results, cost savings and future developments in its existing business as well as the impact of future acquisitions, and the company's financial position. These statements can be management estimates based on information provided by specialized agencies or advisors.

DSM cautions readers that such statements involve certain risks and uncertainties that are difficult to predict and therefore it should be understood that many factors can cause the company's actual performance and position to differ materially from these statements.

These factors include, but are not limited to, macro-economic, market and business trends and conditions, (low-cost) competition, legal claims, the ability to protect intellectual property, changes in legislation, changes in exchange and interest rates, changes in tax rates, pension costs, raw material and energy prices, employee costs, the implementation of the company's strategy, the company's ability to identify and complete acquisitions and to successfully integrate acquired companies, the company's ability to realize planned disposals, savings, restructuring or benefits, the company's ability to identify, develop and successfully commercialize new products, markets or technologies, economic and/or political changes and other developments in countries and markets in which DSM operates.

As a result, DSM's actual future performance, position and/or financial results may differ materially from the plans, goals and expectations set forth in such forward-looking statements.

DSM has no obligation to update the statements contained in this document, unless required by law.

A more comprehensive discussion of the risk factors affecting DSM's business can be found in the company's latest Integrated Annual Report, a copy of which can be found on the company's corporate website, www.dsm.com.

Financial information provided in this document is audited by external auditors.

DSM – Bright Science. Brighter Living.™

Royal DSM is a global, purpose-led, science-based company active in Nutrition, Health and Sustainable Living. DSM's purpose is to create brighter lives for all. With its products and solutions DSM addresses some of the world's biggest challenges while simultaneously creating economic, environmental and societal value for all our stakeholders – customers, employees, shareholders, and society at large. DSM delivers innovative solutions for human nutrition, animal nutrition, personal care and aroma, medical devices, green products and applications, and new mobility and connectivity. Including our associated companies, we deliver annual net sales of about €10 billion with approximately 23,000 employees. The company is listed on Euronext Amsterdam. More information can be found at www.dsm.com.

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