



The Dow Chemical Company

**RECEIVED**  
EXECUTIVE CORRESPONDENCE

DEC 06 2013

OFFICE OF THE STATE COMPTROLLER  
THOMAS P. DINAPOLI  
COMPTROLLER

2030 DOW CENTER  
December 5, 2013

Mr. Thomas P. DiNapoli  
State of New York  
Office of the State Comptroller  
110 State Street  
Albany, NY 12236

Dear Mr. DiNapoli:

Thank you for your December 3<sup>rd</sup> letter to our Chairman and CEO, Andrew Liveris, and for sharing your concerns with us. Andrew has asked that I respond to you and share our thoughts on this important issue, as I serve as Dow's Vice President of Olympic Operations.

I would like to take this opportunity to explain more in depth where Dow stands on the Lesbian, Gay, Bisexual and Transgender (LGBT) concerns in relation to the anti-gay propaganda law passed earlier this year in Russia.

First, however, I think it's important to let you know about Dow's support for our LGBT colleagues. It begins with our affirmation of unequivocal support for non-discrimination and work place equality, which has long been clearly and proudly stated on our company's website, as well as in our Respect and Responsibility Policy. This serves as the fundamental guide for fairness and inclusion at Dow.

This approach has been long-standing. Our LGBT ERG (Employee Resource Group), GLAD (Gays, Lesbians and Allies at Dow), has been championing for the fundamental rights of LGBT in the workplace for 13 years. During that time, we have instituted employee protections based on gender identity and begun providing transgender benefits. Dow was one of the first companies to offer benefits to domestic partners and for more than a decade we have offered equal benefits to same-sex partners for everything from health and dental, to life insurance and bereavement leave, to relocation and dual career assistance – and we also recognize survivor benefits for our pension plan for LGBT. Additionally, we supported the extension of tax-free treatment of medical premiums to employees' same-sex spouses.



WORLDWIDE PARTNER



Mr. Thomas P. DiNapoli

December 5, 2013

Page 2

Our employees have been instrumental in driving our commitment globally. GLAD continues to experience tremendous support and participation growth year over year, and has elevated to the largest of Dow's seven employee-supported ERGs, now with participation at 66 different sites in 24 countries, with chapters on every continent. Additionally, Company leadership is involved with more than one third of our global leaders participating in GLAD. And, these employees and leaders take their commitment beyond company hallways by involving themselves in LGBT issues at a local level and helping to bring the values that we live to their communities and families.

I'm proud to say our actions are recognized. Dow has been invited multiple times to speak on Capitol Hill on LGBT rights in the workplace, most recently in 2012, when we testified in support of the Employment Non-Discrimination Act. In addition, we live our commitment through our sponsorships of PFLAG, Pride parades throughout the U.S. and abroad, multiple AIDS Walks, Out & Equal, The Victory Fund & Institute, and the International Chamber of Commerce, to name a few. Further, and as a matter of publically stated policy, Dow will not knowingly grant charitable contributions to organizations that do not provide non-discrimination policies/protections.

You raised the point in your letter about how important these issues are to business success. We agree and are not only vocal and public today in our position, but we have been for some time – in culture, practice and policy. We believe the full inclusion of LGBT employees is a matter of fairness, equality and fundamental human right and also a business imperative.

This business imperative is vital to us. Dow does business and has relationships with customers in many countries around the world - and each nation and its citizens have different systems, cultures, religions and perspectives. Our foundation retains a strong diversity & inclusion philosophy that ensures that we acknowledge differences and respect every individual wherever we are. By keeping these values alive and staying close to our cultural beliefs, we are convinced we will have a positive impact on the countries where we do business. This is our consistent approach, and we believe we can achieve a sustainable and long lasting impact.





---

The Dow Chemical Company

Mr. Thomas P. DiNapoli  
December 5, 2013  
Page 3

In closing, we understand the concerns in Russia. I have personally, as early as July, expressed our concerns about the anti-gay propaganda law to the International Olympic Committee as well as with the Sochi Organizing Committee, as have numerous other Dow employees as they join planning calls for the upcoming Olympics. And we will continue to address enhancing the commitment and the spirit of inclusiveness with the right stakeholders. Additionally, you have our commitment that we will remain true to our values in demonstrating our commitment to diversity & inclusion at Dow.

With kind regards,

A handwritten signature in cursive script that reads "George R. Hamilton".

George R. Hamilton  
Vice President  
Olympic Operations

cc: Louis Vega, Chief of Staff, Office of the Chairman & CEO



WORLDWIDE PARTNER