



*Together, improving life*

# GORE MODERN SLAVERY STATEMENT

Our Modern Slavery Statement discusses the activities of W. L. Gore & Associates, Inc., and its subsidiaries ("Gore") and specific activities of its Divisions during the previous financial year, FY 2023, to address forced labor, human trafficking, slavery and servitude, debt bondage, child labor, deceptive recruiting for labor or services and other similar conduct (collectively, "modern slavery") in our business and supply chains. To provide context for Gore's FY 2023 activities, this statement also refers to certain pre-FY 2023 and planned activities.

This statement is published pursuant to the California Transparency in Supply Chains Act, the United Kingdom Modern Slavery Act, and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

## **I. BUSINESS ACTIVITIES AND SUPPLY CHAINS**

Gore is a uniquely creative, technology-driven Enterprise focusing on discovery and product innovation. Gore has served a variety of global markets for over 65 years and has thrived by providing its customers with high-value products that enhance their quality of life. With more than \$4.8 billion in annual revenues, we are recognized by Forbes magazine as one of the 200 largest privately held companies in the U.S.

Founded in 1958 by Bill and Vieve Gore, Gore has more than 12,800 employees ("Associates") working in more than 25 countries as part of our research and manufacturing operations in the United States, Germany, the United Kingdom, the Netherlands, China and Japan. Gore Associates are part owners of the Gore Enterprise through the stock ownership plan and take great pride in being part of a strong global enterprise and the broad contributions our business makes to society.

By using proprietary technologies, Gore has created numerous products for fabric laminates, medical implants, cable, filtration, sealant, membrane, venting and fiber technologies. Innovating across more than 15 diverse industries, we currently hold 5,600 active patents globally.

Gore operates through three main product divisions: Fabrics, Medical Products, and Performance Solutions. The Fabrics Division specializes in delivering apparel and textile products designed to offer comfort and protection in both demanding environments and daily life. The Fabrics Division is further organized into three business units: the Vertical Business, Consumer-Oriented Fabrics and Technical-Oriented Fabrics. Our direct-to-consumer Vertical Business provides significant performance advantages to end consumers. Additionally, the offerings by our Consumer-Oriented Fabrics and Technical-Oriented Fabrics business units serve as essential ingredients used in garments, footwear, gloves and accessories, manufactured by certain non-Gore factories ("Certified Manufacturer") on behalf of Gore's Trademark Licensees. Certification involves close scrutiny of prospective manufacturers to ensure they meet Gore's standards on quality, ethical business and human rights.

Gore's Medical Products Division develops, manufactures and sells vascular grafts, endovascular and interventional devices and surgical meshes used to treat complex



healthcare challenges. This Division is organized into several business units: Aortic, Cardiac, General Medical Products and Peripheral. Finally, Gore's Performance Solutions Division develops, manufactures and sells products and technologies that address complex product developments and process challenges across markets and industries, ranging from aerospace and defense to pharmaceuticals. Business units under this Division are Clean Energy, Filtration, Transformative System Solutions, Venting and PharmBio.

Gore takes a risk-based approach to supplier due diligence, tailored to the needs of each Division, to effectively identify and mitigate risks. For example, in Fabrics, Gore sells and manufactures products directly to consumers through the Vertical Business. Some products contain cotton, requiring heightened due diligence of the supply chain to the source. In another example, due to the nature of a specific subset of the raw materials (e.g., gold) required to develop and manufacture our Performance Solutions products, Gore endeavors to identify if there are any conflict minerals risks in the supply chain. Accordingly, as described in more detail below, Gore's approach to due diligence to address modern slavery differs based on the risks in the specific supply chain and may vary by Division and business.

Gore has over 1,600 direct material suppliers. About 56% of these suppliers are located in the Americas region, 34% in Europe, the Middle East and Africa, and 16% in the Asia-Pacific region. We also have a vast network of "indirect" suppliers from whom we procure various goods and services (e.g., IT support, logistics, landscaping, etc.), which are not incorporated into our product as materials or components.

Additional information on Gore's business activities is available on our [website](#).

## **II. GORE'S GUIDING PRINCIPLES AND COMMITMENTS**

At Gore, we are collectively committed to fostering a safe and healthy work environment where diverse teams of Associates collaborate to drive innovation, high performance and responsibly direct their activities to achieve exceptional business results. This commitment underpins our efforts to guard against modern slavery in all steps in the production of our products and across our company's supply chains. Gore expects its suppliers, business partners, distributors and any other representatives to maintain this same level of respect for human rights.

Gore strives to be fair to everyone with whom we do business and is committed to upholding all human rights, including the right to be free from modern slavery, and has adopted policies consistent with the United Nations ("UN") Universal Declaration of Human Rights, the UN Convention on Children's Rights, the UN Convention on Elimination of All Forms of Discrimination Against Women, the UN Global Compact and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and International Labor Organization (ILO) standards.

## **III. POLICIES**

Gore maintains several policies to uphold its guiding principles and social responsibility commitments.

**Human Rights Policy:** Gore's [Human Rights Policy](#) was released on June 12, 2023, to coincide with the World Day against Child Labor. The policy applies to the entire Enterprise, articulates our stance on human rights, and defines the expectation that all people will be



treated with dignity and respect. It covers fundamental rights, such as the prohibition of child labor and forced labor, non-harassment, reasonable working hours, fair wages and equal opportunity.

**Supplier Code of Conduct:** In 2022, we introduced our [Supplier Code of Conduct](#) ("CoC"). The CoC sets out our expectations related to ethical practices, human rights, environmental management, and legal requirements. The CoC imposes explicit requirements on direct suppliers, including a prohibition on the use of forced labor, including but not limited to child labor; a prohibition on requiring supplier employees to pay any recruitment fees or other fees to obtain employment; and a requirement that any third-party recruitment agency used by a supplier complies with applicable laws and regulations and the CoC, among other requirements.

The CoC also requires suppliers to ensure that their workers have the right to refuse unsafe work and to report working conditions that pose unacceptable risks to workers' health or safety. Suppliers must have in place adequate and impartial systems to address employee concerns and grievances that protect confidentiality, allow anonymity of reporting (to the extent permitted by law), and protect reporting or implicated employees against retaliation. Suppliers must adhere to the more stringent of the two in case of differences between the applicable laws and regulations and the CoC. Gore expects that suppliers will ensure that their sub-tier suppliers and/or subcontractors will adhere to similar, not less stringent conditions as those contained in the CoC.

The CoC is now in use by our Medical Products and Performance Solutions Divisions. We also revised our Purchasing Order Terms & Conditions to reference the CoC. Updated Purchase Order Terms & Conditions were rolled out in June 2023, further establishing our expectations concerning human rights in Gore's supply chains. Policies and programs for verifying supplier compliance with the CoC are under development.

**Guidelines on Social Responsibility:** The [Guidelines on Social Responsibility](#) ("GSR") are the precursor to the CoC and similarly set forth our expectations regarding fair labor requirements, including the prohibition of the use of forced labor and child labor, healthy and safe working environments, and other social responsibility topics.

Currently, the GSR is being used by Gore's Fabrics Division with certain suppliers and customers. In 2022, the Fabrics Division communicated the assessment and certification requirements to demonstrate compliance with the GSR as a mid-term goal to all suppliers that Gore has identified as strategic to Gore's supply chain, based on spending and criticality ("Strategic and Key Suppliers"). All Strategic and Key Suppliers of the Fabrics Division have since agreed to comply with the GSR and to require compliance with the GSR along their supply chains. During the next supplier contract update scheduled for 2025, the Fabrics Division will replace the GSR with the CoC where applicable. GSR will continue to be used to ensure alignment with our customers.

**Associates' Standards of Ethical Conduct:** The [Associates' Standards of Ethical Conduct](#) ("ASEC") describes expectations for ethical behavior and compliance with applicable laws and regulations. Gore Associates are expected to demonstrate integrity in all relationships, including when dealing with suppliers, customers, stakeholders and other Gore Associates. Gore maintains a dedicated Integrity Helpline for reporting any violations of these standards or any applicable law, regulation or company policy. The Integrity Helpline is available 24 hours a day, seven days a week, with operators who speak many languages,



and it is open to internal and external individuals. All reports are handled promptly by the appropriate department and can remain anonymous, except where prohibited by law or regulation. Retaliation against anyone who has reported possible misconduct in good faith, or participated in an investigation, is not acceptable. Anyone who engages in retaliation will be subject to disciplinary action.

Violations of our ASEC, Gore policies, or the law may carry severe consequences for the individuals involved and for Gore. Anyone engaging in unethical or illegal behavior and those who offer, attempt to offer, promise, condone, approve or facilitate such behavior, may be subject to disciplinary action up to and including termination of employment.

#### **IV. SUPPLY CHAIN RISK ASSESSMENTS, DUE DILIGENCE AND VERIFICATION**

Gore actively monitors forced and child labor risks in its supply chains, assesses those risks, and evaluates the effectiveness of its efforts to protect workers and ensure transparency.

Gore utilizes national and international resources and multi-stakeholder initiatives to identify areas of heightened forced labor risks in its supply chains, such as the U.S. Department of Labor "List of Goods Produced by Child Labor or Forced Labor," which notes that garments, textiles and footwear are at-risk sectors. With high-risk supply chains, we undertake heightened due diligence and verification. For example, we annually survey certain suppliers to our Performance Solutions Division to identify the smelters/refiners from which they source tantalum, tin, tungsten and gold (also known as "3TG") and check those entities against the Responsible Minerals Initiative's database to see if they are conformant with the Responsible Minerals Assurance Process. Additionally, due to the high-risk nature of the cotton supply chain, the Fabrics Division has processes in place to conduct heightened due diligence for our cotton supply chain.

Most finished apparel and footwear products made with Gore fabrics are placed on the market by our customers, many of whom have their programs in place to address forced labor and human trafficking risks. Gore supports the efforts of these customers to assess risk and conduct due diligence in their own and their suppliers' manufacturing facilities to prevent any violation of zero-tolerance policies (including modern slavery) by, for example, reviewing social compliance audit reports and following up on remedial efforts for non-compliances that are identified.

Gore endeavors to identify supply chain risks, including modern slavery risks, prior to introducing new suppliers. Gore uses a robust restricted party screening system to identify potentially restricted business activities. Gore conducts additional due diligence with certain new suppliers to supply chains identified as higher risk. In accordance with our sustainability aspirations and values, we are continuously improving our due diligence activities during and after the onboarding stage based on our assessments of potential risks for modern slavery and other human rights issues in our supply chains.

In 2021, we conducted a preliminary human rights risk assessment with a reputable supply chain management consultant to further identify high-risk supply chains. The assessment utilized historical data on a comprehensive set of risk factors relevant to companies in similar industries and locations. It involved almost 1,600 entities, including our regular direct suppliers to all Gore Divisions and our cross-divisional manufacturing facilities covering, among other human rights topics, child labor, migrant labor and modern slavery. Further information regarding our human rights risk assessment is available in our [2022 Sustainability Update](#).



The assessment found that Gore's average human rights risk exposure was relatively low, owing mainly to the fact that most of our suppliers are located in the United States and Western Europe, where there is typically a lower risk of violations, particularly with respect to forced and child labor. However, we recognize that conditions may vary significantly from one facility to another, even in the same country, and that the circumstances might change rapidly in the same facility. We have therefore used the 2021 preliminary human rights risk assessment to further our due diligence efforts globally.

This first assessment helped us to identify additional actions to mitigate risks in our supply chains. For example, to date, of the small number of suppliers to our Performance Solutions and Medical Products Divisions identified in the 2021 assessment as potentially higher risk, 100 percent have either agreed to comply with the Gore CoC or provided a code of conduct of their own that meets our criteria, along with 92 percent of medium-risk suppliers. We are pursuing alignment with the remainder of the medium-risk suppliers.

We are updating our risk assessment in 2023 and will continue to conduct such assessments annually to ensure we monitor changing risk factors going forward. Our company-wide Supply Chain Due Diligence (SCDD) taskforce, with representatives from Divisional and Indirect Procurement teams and support from other functions (e.g., Sustainability, Legal, Compliance), is currently working to enhance our risk assessment and risk mitigation systems. Here are some examples of Enterprise-wide plans we are pursuing as part of our multi-year project:

- Initiating risk assessments for our "indirect" suppliers (e.g., IT support, logistics, landscaping, etc.);
- Providing training opportunities to certain suppliers;
- Strengthening traceability in potentially higher-risk supply chains; and
- Broadening the geographical coverage of our Integrity Helpline.

### **Multi-Stakeholder Initiatives**

In addition to the above risk assessment, mitigation and verification efforts, Gore participates in several multi-stakeholder initiatives that support our values and commitment to guard against modern slavery from our supply chains, including but not limited to the use of independent third-party audits for certain potentially higher-risk supply chains. Through participation in these initiatives, Gore is able to develop further and measure the effectiveness of its efforts to ensure that forced labor and child labor are not used by the company or in its supply chains.

Gore is a founding member of the Sustainable Apparel Coalition, which developed the Higg Index, now maintained by [Worldly](#), to drive increased transparency of fair labor conditions within the supply chain. In 2018, the Higg Index rolled out the Higg Facility Social & Labor Module ("FSLM"), a comprehensive tool designed to assess labor practices by manufacturing facilities. The Higg FSLM assesses recruitment and hiring, working hours, wages and benefits, employee treatment, employee involvement, health and safety, termination, management systems and empowering people and communities. Since 2019, the Fabrics Division has been using this tool for annual assessment and independent, announced audits of the social compliance performance of three Gore-owned manufacturing facilities. The results are available on Worldly's Higg Portal for our customers to review and are also included in our Fabrics Division annual [Responsibility Updates](#). We encourage our suppliers and business partners to use the Higg Index to assess their performance on fair working conditions.



As mentioned above, the Responsible Minerals Initiative ("RMI") is another industry effort we participate in. RMI was founded to support companies from various industries in addressing responsible mineral sourcing issues in their supply chains, including modern slavery in mining. The RMI is especially relevant to our Performance Solutions Division as the bill of materials for certain products in the portfolio may include 3TG.

In 2021, the Performance Solutions Division selected EcoVadis as its third-party sustainability self-assessment platform. Performance is assessed annually through an evidence-based approach that gathers company information and then validates and analyzes it to measure 21 sustainability indicators grouped into four themes: Environment, Labor and Human Rights, Ethics and Sustainable Procurement. The result is a scorecard reflecting the quality of the company's sustainability management system at the time of the assessment that can then be shared with our customers and suppliers on demand.

Lastly, our own finished apparel brand, GOREWEAR, part of our Vertical Business in the Fabrics Division, has been affiliated with the [Fair Labor Association](#) ("FLA") since 2012, adopting that organization's [Workplace Code of Conduct](#) for social compliance in garment manufacturing. This requires that GOREWEAR's Tier 1 (cut and sew) supplier facilities conduct business in alignment with the FLA Code of Conduct. We monitor compliance with this requirement through independent third-party audits of Tier 1 supplier facilities against the FLA Compliance Benchmarks. Audits are announced and conducted by FLA-accredited monitoring organizations for all suppliers on an annual basis, except for those low-risk suppliers with no serious findings, in which case audits are conducted approximately every 18 months to two years. Additionally, the FLA performs independent social audit spot checks with results made public on the organization's website.

In 2017, GOREWEAR earned [Fair Labor Accreditation](#), the FLA's highest recognition for socially responsible sourcing. Fair Labor Accreditation signifies that a company has effective systems in place that protect workers in its global supply chain. Accreditation requires detailed company reporting on social compliance program systems, procedures, strategies and tools. Reports are verified by the FLA on an annual basis. FLA staff and assessors also visit company sites and verify practices against the FLA Code of Conduct. In September 2019, SITKA® Gear, another direct-to-consumer brand of the Vertical Business in the Fabrics Division, also joined the FLA.<sup>1</sup>

Also in 2019, GOREWEAR and SITKA® Gear joined the American Apparel & Footwear Association (AAFA) and FLA's Industry Commitment to Responsible Recruitment in a further effort to combat forced labor. The Commitment calls on brands to uphold certain standards when employing or working with supply chain partners who employ migrant employees and to publicly report on their efforts. GOREWEAR and SITKA® Gear report to the AAFA and FLA on the steps taken to implement the pledge. On March 8, 2023, the AAFA and FLA relaunched the [Industry Commitment to Responsible Recruitment](#) to strengthen the principles of the pledge and enhance industry efforts to address potential forced labor risks for migrant workers in the global supply chain. W. L. Gore & Associates, Inc., SITKA® Gear, and GOREWEAR are signatories to the relaunched AAFA/FLA Industry Commitment to Responsible Recruitment.

## **V. TRAINING**

Gore recognizes the importance of providing training to its Associates and Leadership teams on modern slavery risks. Therefore, Gore requires training on these risks and compliance with applicable laws and regulations. In March 2023, a mandatory online training titled



"Preventing Forced Labor" was delivered to all Procurement Associates, including a quiz to evaluate comprehension. This training, which is also optionally available to all Associates via our online training library, was a sequel to a training delivered previously titled "Recognizing Forced Labor." These trainings include an overview of measures buyers can take to mitigate the risk of forced labor, including the specific requirements of the California Transparency in Supply Chains Act and the UK Modern Slavery Act. Future training will also cover the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

On October 18, 2022, the Legal Regulatory team, the Global Trade team, and the Sustainability/Social Responsibility team held a workshop to raise awareness about current compliance topics, including sanctions, export controls, and forced labor and human rights. Approximately 90 Associates from across Gore's departments (Trade, Compliance, Sustainability, Procurement, Legal) were invited. The workshop included presentations by external legal consultants. The expectation was for attendees to become sufficiently familiar with these topics to assist in identifying potential risks to Gore.

## **VI. REMEDIATION**

Gore did not identify any modern slavery practices in our supply chains in FY 2023 and therefore did not need to deploy measures to remediate such practices or the loss of income resulting from eliminating such practices. Gore is in the process of developing remediation policies so that these can be deployed if needed.

## **VII. APPROVAL**

This statement covers the period from April 1, 2022, to March 31, 2023, and has been approved by the Gore Board of Directors on September 15, 2023.