



Together, improving life

POLICY STATEMENT FOR LKSG

1. INTRODUCTION

W. L. Gore & Associates (hereinafter "Gore") has consistently ensured ethical business practices since the company was founded in 1958. Our brand promise ***Together, improving life*** guides us in everything we do and serves as our compass when dealing with human rights.

We aspire to maximize the value that our innovations bring to society while minimizing the potential social and environmental burden of our products and operations. Therefore, respect for human rights is first and foremost about being true to our culture and brand promise and, most directly, about striving to be fair to everyone we reach with our business. We are committed to respecting the dignity of all persons and their fundamental human rights.

2. HUMAN RIGHT STRATEGY

Gore conducts business in compliance with all applicable national and local laws, regulations, ordinances and other relevant legal requirements that apply to our business, including those relating to human rights, labor practices, the environment, safety, sanitation and building security. Where local requirements are less stringent than international human rights standards, we comply with the latter.

Our guiding standards:

- the Universal Declaration of Human Rights of the United Nations (UN)
- the International Covenant on Civil and Political Rights
- the International Covenant on Economic, Social and Cultural Rights
- the UN Convention on the Rights of the Child, the UN Convention on the Elimination of All Forms of Discrimination against Women
- the UN Guiding Principles on Business and Human Rights
- The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- the UN Global Compact
- The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises

In addition, we support the United Nations Sustainable Development Goals and focus on the goals that we can impact with our products and operations, which are important to our stakeholders and align with our promise.



3. OUR GUIDELINES

Acting responsibly, sustainably and lawfully is a core value firmly anchored in our corporate strategy. We carefully evaluate how our business activities and products impact the well-being of those around us. This includes our associates, customers, supply chain partners and our own companies in our respective markets. We put this aspiration into practice with the globally applicable guidelines below:

3.1 Standards of Ethical Conduct

Our [Associates' Standards of Ethical Conduct](#) explain how we conduct ourselves ethically in our day-to-day work. In our company, all Associates contribute to an inclusive work environment in which all people inside and outside Gore are treated fairly, with dignity and respect, reflecting the diversity of the societies in which we operate.

We place equally high integrity requirements on our distributors, sales representatives, consultants, service providers and other third parties (collectively, "representatives") who represent Gore or deal with our products. They must all comply with our globally applicable [Standards of Ethical Conduct for Third Party Representatives](#).

3.2 Supplier Code of Conduct

As part of our ongoing efforts to enhance supply chain due diligence, we have developed a [Supplier Code of Conduct](#) that sets out what we expect from all suppliers - including contract manufacturers - regarding human rights, ethical behavior, environmental management, and legal requirements. As explained above, we adhere to established international standards and industry-wide best practices and expect our suppliers to monitor the compliance of their subcontractors and sub-suppliers with the Code of Conduct. We apply the same standards to our production activities.

Gore's businesses span the textile, medical and electronics industries, among others. Issues around human and labor rights, which are commonly considered key concerns in these sectors, are covered by our Supplier Code of Conduct:

- prohibition of forced labor
- prohibition of child labor and protection of young employees
- equal opportunity
- non-harassment
- freedom of association and collective bargaining
- fair wages and fringe benefits
- reasonable working hours
- occupational safety and health management
- responsible sourcing of minerals
- environmental management (including hazardous substances and waste management)

3.3 Guidelines on Social Responsibility

Our [Guidelines on Social Responsibility](#) explain Gore's workplace standards to our customers and other business partners. In part, the guidelines overlap with the Supplier



Code of Conduct, but they complement the respective business relationships depending on Gore's influence and responsibility toward its business partners. In this way, we aim to ensure consistently high standards across the value chain with the help of our business partners.

3.4 Human Rights Policy

Acting responsibly and lawfully is one of our essential values and is firmly anchored in our corporate strategy under the previously listed guidelines. This includes, as far as applicable to Gore, effective and appropriate compliance with human rights-related and environmental due diligence obligations as described in the LkSG:

- M1 Prohibition of child labor
- M2 Prohibition of forced labor and all forms of slavery
- M3 Disregard for occupational health and safety and work-related health hazards.
- M4 Disregard for freedom of association - freedom of association and the right to collective bargaining
- M5 Prohibition of unequal treatment in employment
- M6 Prohibition of the withholding of a reasonable wage
- M7 Destruction of the natural basis of life through environmental pollution
- M8 Illegal violation of land rights
- M9 Prohibit the hiring or use of private/public security forces that may cause interference due to lack of instruction or control.
- M10 The prohibition of an act or omission in breach of duty that is directly capable of impairing in a particularly serious manner a protected legal position (arising from the human rights conventions within the meaning of Section 2 (1)) and the unlawfulness of which is obvious on a reasonable appraisal of all the circumstances under consideration
- U1 Prohibited production, use and/or disposal of mercury (Minamata Convention).
- U2 Prohibited production and/or use of substances within the scope of the Stockholm Convention on Persistent Organic Pollutants (POPs), as well as non-environmentally sound handling of waste containing POPs
- U3 Prohibited import/export of hazardous waste as defined by the Basel Convention

In this context, we have adopted a comprehensive [Human Rights Policy](#).

4. EXPECTATIONS

We expect our employees and suppliers in the supply chain within the meaning of the LkSG to support the company to the best of their ability to adequately prevent and, if necessary, minimize or end the human rights and environmental risks described within the framework of the Act. This applies, in particular, to the priority human rights risks below. As defined by the Act, employees and suppliers in the supply chain are expected to support us, Gore, in risk management, risk analysis, prevention and remediation measures, and the grievance procedure per this Policy Statement and our Guidelines above.



5. PRIORITY RISKS

Our risk analysis is carried out regularly and on an ad hoc basis, in accordance with the requirements of the law, and this policy statement is reviewed and updated accordingly.

Gore operates globally, i.e., has global supply chains, resulting in high complexity and diversity. The global nature of our operations and technologies gives rise to systemic risks, some of which are beyond our control. We will prioritize risks based on severity, probability, reversibility, and our level of influence or potential contribution.

Garments, textiles and footwear are known to be at-risk sectors for child labor and forced labor. Therefore, for our Fabrics Division and vertical brands, we undertake heightened due diligence and verification of suppliers with respect to these topics. Similarly, conflict minerals (also known as 3TG) used by our Performance Solutions Division and, to a lesser extent, by our Medical Products Division pose child labor and modern slavery risks. We try to mitigate such risks by surveying our suppliers for the smelters/refiners they source from and their conformance to industry standards.

Hence, we have prioritized the following risks for our direct and indirect suppliers:

- M1 Prohibition of child labor
- M2 Prohibition of forced labor and all forms of slavery

6. PROCEDURE

We have a robust management system consisting of regulatory monitoring, risk management, preventive and remedial measures as well as a Grievance Mechanism. The requirements of the Supply Chain Compliance Act are being woven into these systems in terms of personnel, processes and documentation.

Annual and event-related risk analyses are carried out in the company's business area and the supply chain per the regulations of the LkSG, and their results are weighted and prioritized appropriately. Based on the risk analysis results, the appropriately weighted and prioritized risks are assigned preventive and remedial measures following the law. The effectiveness of these measures is reviewed annually and on an ad hoc basis and updated as necessary.

We also include indirect suppliers in the aforementioned analyses and measures, particularly if we have factual indications that make a violation of a human rights-related or environmental obligation at an indirect supplier appear possible (i.e., substantiated knowledge).

We maintain a complaint procedure that complies with the law. We will document and report compliance with due diligence requirements in accordance with the law.

6.1 Risk analysis

We conduct risk analyses in accordance with the LkSG on an annual basis, and we will conduct such analyses on an ad hoc basis if warranted. Such analysis involves abstract risk assessments based on reputable methodologies, supplier surveys, media research, desktop audits or on-site inspections, and engagement with (potentially affected) stakeholders such as employees and industry associations. The risks identified in this process are assessed and prioritized based on the severity and likelihood of potential



adverse impacts. We communicate the results of our risk analysis to the relevant decision-makers and give them appropriate consideration.

6.2 Preventive measures

To avoid or mitigate identified risks, we have introduced various preventive measures including but not limited to monitoring through audits, assessments and adverse media scanning. We are exploring methods to assess the effectiveness of preventive measures on an ongoing basis and adjust as necessary.

For our own operations, we continuously train our employees and engage in industry initiatives (e.g., the Fair Labor Association and Sustainable Apparel Coalition for apparel, textiles, and footwear, and the Responsible Minerals Initiative for conflict minerals). We also regularly review compliance with the standards from this policy statement and take them into account as part of due diligence for planned investments in sites, facilities, and equipment.

We also actively work towards compliance with and implementation of these standards along the value chain. Our direct suppliers' commitment to complying with these standards is an indispensable prerequisite for lasting business relationships.

Our Supplier Code of Conduct is part of our General Terms and Conditions of Purchase. The Supplier Code of Conduct allows for internal on-site inspections and external audits to regularly monitor compliance with the standards set out in this policy statement. In addition, we also require our direct suppliers to flow down human rights compliance to their respective suppliers. In the interest of a more robust alignment, we separately communicate the Gore Supplier Code to higher-risk suppliers, asking for their review and acknowledgment.

We also plan to offer training courses for our direct suppliers, in which participants are informed about human rights and labor standards and our requirements.

We also strive to comply with these standards regarding indirect suppliers. If we become aware of a (possible) violation at an indirect supplier, we conduct a risk analysis and take appropriate preventive and remedial measures.

6.3 Remedial action

If we identify imminent or existing violations of a human rights-related or environmental due diligence obligation in our own operations, we will immediately prevent, end or minimize these to the best of our ability depending on the individual case. The same applies - where possible - to violations at one of our direct suppliers. If a violation at a supplier is such that we cannot prevent it or end it in the foreseeable future, we discuss a minimization plan with the respective supplier, provided the violation is not of an egregious nature.

6.4 Structure and responsibilities

We are working towards establishing an effective risk management system geared towards enabling us to identify and minimize human rights and environmental risks and to prevent, end or minimize the extent of violations if we have caused or contributed to them in the supply chain. Enterprise Social Responsibility Champion



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(Menschenrechtsbeauftragter), together with the Core Team, oversees our risk management and reports directly to senior management.

6.5 Complaints procedure

We have established an LkSG-compliant system for complaints and notifications regarding human rights and environment-related risks as well as violations of human rights-related or environment-related obligations that have arisen as a result of the company's economic activities in its business area or those of our direct suppliers.

For this purpose, our [Integrity Helpline](#), with contacts speaking many different languages, is available around the clock. Reported information is treated confidentially to the extent possible and permitted by law. Anonymous reports are also possible - unless prohibited by law. We investigate complaints quickly, depending on their complexity. Per our guidelines, sanctions, countermeasures, and defensive measures against persons who have reported possible misconduct to the best of their knowledge or have cooperated in its clarification are prohibited and will be sanctioned with disciplinary or other measures.

6.6 Documentation and Report

We document and report in accordance with the LkSG. When available, a link to the reports will be included here [●].

6.7 Update

We update this policy statement and the measures in accordance with the LkSG.

Markus Minich
Managing Director
W. L. Gore & Associates GmbH

This statement was approved on March 24th, 2024