

# **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 businesses during the previous financial year, FY 2025, 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 2025 activities, this statement also refers to certain pre-FY 2025 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 (see Appendix).

## 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 \$5 billion in annual revenue, 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 and headquartered in the United States, Gore has approximately 13,000 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, implantable medical devices, cable, filtration, sealant, membrane, venting and fiber technologies. Innovating across more than 15 diverse industries, our commitment to research & development has generated more than 3,100 unique inventions and counting.

Gore operates through four primary businesses, which include: Fabrics, Medical, Performance Solutions, and Specialty businesses. Fabrics specializes in delivering apparel and textile products designed to offer comfort and protection in both demanding environments and daily life. Fabrics also includes a direct-to-consumer vertical business unit, which provides significant performance advantages to end consumers. Additionally, Fabrics has business lines that serve as essential ingredients used in garments, footwear, gloves and accessories, manufactured by certain non-Gore factories (depending on the product "Certified Manufacturers" or non-certified third parties) on behalf of Gore's Trademark Licensees. Certification involves scrutiny of prospective manufacturers to ensure they meet Gore's standards on quality, ethical business and human rights. For non-certified



manufacturing facilities, we expect that Gore's Trademark Licensees ensure compliance with Guidelines on Social Responsibility (see below).

Gore's Medical businesses develop, manufacture and sell vascular grafts, endovascular and interventional devices and surgical meshes used to treat complex healthcare challenges.

Gore's Performance Solutions businesses develop, manufacture and sell products and technologies that address complex product developments and process challenges across markets and industries, ranging from aerospace and defense to industrial filtration.

Historically, we have organized our businesses in three divisions, as explained above. Over our last couple of fiscal years, we began shifting to a new organizational structure that adds a newly formed Specialty Group of businesses, spanning clean energy solutions, pharmaceutical processing and life science technologies, and consumer guitar strings.

Gore takes a risk-based approach to supplier due diligence, tailored to the needs of each business, to effectively identify and mitigate risks. For example, Gore Fabrics manufactures and sells certain garments and footwear directly to consumers, some of which 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 business.

Gore's direct material suppliers span 35 countries. About 45% of these suppliers are located in the Americas region, 40% in Europe, the Middle East and Africa, and 15% 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 and high performance, and to 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.

## **POLICIES**

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

**Human Rights Policy**: Gore's <u>Human Rights Policy</u> 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**: Our <u>Supplier Code of Conduct</u> ("CoC") sets out our expectations related to ethical practices, human rights, environmental management, and legal requirements. The CoC imposes explicit requirements on 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 used by all of our businesses and incorporated into our Purchasing Order Terms & Conditions.

**Guidelines on Social Responsibility:** The <u>Guidelines on Social Responsibility</u> ("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.

**Associates' Standards of Ethical Conduct:** The <u>Associates' Standards of Ethical Conduct</u> ("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.

#### **GOVERNANCE**

Gore's human rights governance structure is set forth in our Human Rights Policy, which specifies that Gore's Enterprise Leadership Team bears ultimate accountability for compliance with the policy. Supply Chain and Sustainability teams collaborate to define and implement necessary capabilities to live up to this policy.

Gore's expectations from our suppliers in accordance with our Human Rights Policy are laid out in our Supplier Code of Conduct (CoC). Our approach is full integration of supply chain due diligence into our business processes, including Gore's manufacturing operations as well as supply chain vendors, and utilizing human and other resources that our Supply Chain organization controls. Accordingly, our Supply Chain and Procurement Leadership are responsible for due diligence aimed at ensuring suppliers operate in compliance with the CoC.

We have created a Center of Excellence - with representatives from Procurement teams and support from other functions (e.g., Sustainability, Legal, Compliance) - dedicated to continuous improvement. It is led by the Enterprise Social Responsibility Champion, providing oversight across our product line businesses and keeping the responsible leadership informed.

# III. 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. With high-risk supply chains, we undertake heightened due diligence and verification. For example, we annually survey certain suppliers to our Performance Solutions businesses to identify the smelters/refiners from which they source tantalum, tin, tungsten, gold (also known as "3TG"), cobalt and mica, 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, our Fabrics businesses have processes in place to conduct heightened due diligence for our cotton supply chain.

The U.S. Department of Labor "List of Goods Produced by Child Labor or Forced Labor" notes that garments, textiles and footwear are at-risk sectors. A specific area of risk in



these sectors is migrant workers. In 2024, Transparentem, a non-profit organization dedicated to improving human rights practices in global supply chains, contacted SITKA® Gear, one of Gore's Fabrics brands. They raised concerns about labor practices in textile mills in Taiwan, alleging potential forced labor risks in some of the mills supplying textiles for SITKA® Gear, as well as almost 50 other brands owned and managed by multinational companies. Transparentem based its allegations on an investigation conducted in Taiwan, which included interviews with migrant workers employed at these textile mills. The findings revealed several risks that align with indicators of forced labor defined by the International Labour Organization (ILO), such as high recruitment fees, restrictions on movement, and excessive overtime. Independent third-party investigations confirmed the accuracy of these allegations and reported additional indicators of forced labor, including intimidation and threats, discipline through fines, excessive overtime, and curfews. While relatively few ingredients come from these manufacturers, SITKA® Gear took the claim very seriously and conducted its own internal investigation. The result was increased collaboration with the other brands to address and remediate the risks as outlined in the Remediation section (Section V) below. The Fabrics business will closely monitor countries like Taiwan, which have significant populations of migrant workers, to prevent and mitigate similar issues in the future.

Most finished apparel and footwear products made by Gore's Fabrics business are placed in 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 2024, we conducted our annual abstract (also known as "inherent") human rights risk assessment using reputable supply chain management tools to further identify high-risk entities among our direct material suppliers. The assessment utilized historical data on a comprehensive set of risk factors relevant to companies in similar industries and locations.

The assessment found that Gore's average human rights risk exposure across our four businesses in this first tier of the supply chain 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 used the human rights risk assessments to further our due diligence efforts globally. For example, we pursue Code of Conduct (CoC) alignment with the small number of direct material suppliers identified as potentially higher risk whereby we ascertain that the supplier either agrees to comply with the Gore CoC or has a code of conduct of their own that meets our criteria. We have also initiated enhanced risk assessment whereby we send applicable suppliers a questionnaire to better understand their systems and capacity to manage human rights risks in their own operations and supply chains. Additionally, we have begun to use adverse media monitoring services in certain businesses, aimed at capturing negative mentions of suppliers on the internet as a warning system. If these oversight mechanisms reveal deficiencies with a supplier's performance, we pursue remedial actions based on severity and impact.

We will continue to conduct such assessments annually to ensure we monitor changing risk factors going forward. Our company-wide Supply Chain Due Diligence (SCDD) Center of Excellence continues to work on enhancing 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:

- Providing a new training on Human Rights Due Diligence to all Associates;
- Strengthening monitoring of first-tier suppliers; and
- Strengthening traceability and due diligence in potentially higher-risk supply chains.

## **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's Fabrics business is a founding member of the Sustainable Apparel Coalition (recently rebranded as Cascale), 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 businesses have 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 the annual Fabrics Responsibility Updates. The Fabrics business encourages its 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 businesses as the bill of materials for certain products in the portfolio may include 3TG. Last year, following RMI's guidance, we broadened the scope of due diligence to include cobalt and mica. Also, we renewed our Bronze-level voluntary contribution to RMI's Assessment Fund, which helps support new smelters and refiners to engage with the Initiative. Gore participates in a number of RMI working groups which are involved in the development of due diligence, risk management, policy, and public reporting frameworks.

Our Performance Solutions businesses use 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. In 2024, Performance Solutions businesses started to use EcoVadis for the monitoring of direct suppliers as well.

Gore's Fabrics direct-to-consumer brands, GOREWEAR® and SITKA® Gear, have been affiliated with the Fair Labor Association ("FLA"), adopting that organization's Workplace Code of Conduct for social compliance in garment manufacturing. This requires that 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, semi-announced and unannounced depending on the supplier's risk profile. We vet audit methodologies and currently accept several different types including audits by third-party service providers, Better Work, Fair Wear Foundation, and the abovementioned FSLM. We also share audits with other FLA member companies in an effort to cut down on audit duplication. Our standard is that audits shall be conducted annually. However, suppliers may be exempt from an annual audit cycle if they are low-risk as well as high performers on previous audits and remediation. Additionally, the FLA performs independent social audit spot checks with results made public on the organization's website.

Both GOREWEAR® and SITKA® Gear brands continue to maintain Fair Labor Accreditation <sup>1</sup>. Earning Fair Labor Accreditation is a rigorous, multi-year process. It includes evaluation in areas ranging from the commitment of our company's leadership to fair labor standards, to our implementation of systems designed to ensure that our factories provide decent and humane working conditions. FLA staff and assessors also visit company sites and verify practices against the FLA Code of Conduct.

<sup>&</sup>lt;sup>1</sup> FLA affiliation of the Gore Fabrics vertical businesses comprises products designed and marketed by W. L. Gore & Associates, Inc., under the consumer-facing brands, GOREWEAR® and SITKA® Gear. Responsible sourcing for all brands is managed by a common supply chain and compliance team. FLA affiliation does not include the broader GORE-TEX laminate production and business of W. L. Gore & Associates.



GOREWEAR® and SITKA® brands also belong to the American Apparel & Footwear Association (AAFA) and FLA's <u>Industry Commitment to Responsible Recruitment</u> 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 businesses report to the AAFA and FLA on the steps taken to implement the pledge. When the AAFA and FLA relaunched the Commitment 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 in 2023, W. L. Gore & Associates, Inc., SITKA® Gear, and GOREWEAR® joined as signatories.

#### IV. 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 2024, a mandatory online training titled "Forced Labor Due Diligence" was delivered to all Procurement Associates. This training, which is also optionally available to all Associates via our online training library, was a sequel to a training delivered previously titled "Preventing 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.

## V. REMEDIATION

In regard to the issue discussed in section III above, SITKA® Gear brand leveraged its membership with the American Apparel and Footwear Association (AAFA) to coordinate our efforts with other brands also contacted by Transparentem. AAFA established a Transparentem Taiwan Investigation Brands Working Group. SITKA® Gear is participating in the working group and co-leads one of the groups focusing on addressing issues at specific mills in Taiwan. SITKA® Gear is committed to working with the AAFA and the Brands Working Group to secure effective remediation, including remediation for reimbursement of migrant workers for recruitment fees paid to find employment in Taiwan.

Gore did not identify any other modern slavery practices in our supply chains in FY 2025 and therefore did not need to deploy measures to remediate such practices or the loss of income resulting from eliminating such practices. We remain steadfast in our dedication to maintaining and enhancing transparency and integrity throughout our operations.

## VI. APPROVAL

This statement covers the period from April 1, 2024, to March 31, 2025, and has been approved by the Gore Board of Directors on May 16, 2025.



In accordance with the requirements of the Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Full name: Bret A. Snyder

• Title: President and CEO

Date: May 16, 2025

Signature:

I have the authority to bind W. L. Gore & Associates Inc.

Bref A. Smyd

#### **APPENDIX**

Below is certain additional information specific to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (S-211):

- This is a joint report on behalf of W. L. Gore & Associates, Inc. (Business No. 896813292RM0001) and its subsidiary, W. L. Gore & Associates Canada, Inc. / W. L. Gore et Associes Canada, Inc. (Business No. 859661605RM0001).
- W. L. Gore & Associates Canada, Inc. has a place of business, imports goods that are produced outside of Canada, does business, and has assets in Canada, primarily for selling and distributing medical products.