

ASSOCIATES' STANDARDS OF ETHICAL CONDUCT

A Commitment to Integrity and Improving Life | Building Relationships Based on Trust | Making Ethical Enterprise Decisions | Fairness In Our Business Relationships | Taking the Long-Term View in Our Communities



Dear Associate,

At Gore, our ability to deliver on our promise of *Together, improving life* begins with the trust we build with each other, our customers and our communities. Every day, we make choices that shape how we work, how we lead, and how we live our principles.

The Associates' Standards of Ethical Conduct (ASEC) exists to guide us, clearly outlining our expectations for ethical behavior and compliance with the laws, policies, and standards that govern our work. Our ASEC is a reflection of the culture we continue to build together—one rooted in living our principles with integrity, enabling us to sustain trusted relationships, protect our reputation, and deliver products that do what we say they will do.

We all play a vital role in fostering a workplace where everyone feels safe, respected, and empowered to speak up if they encounter concerns or unethical practices. I encourage you to familiarize yourself with the ASEC and reach out to your leaders, Human Resources, Legal, or Compliance Associates if you have questions or need guidance.

Thank you for your commitment to ensuring our legacy of high ethics and integrity will continue to guide us as we continue to thrive, together.



Sincerely,

Handwritten signature of Bret Snyder in blue ink.

Bret Snyder
President & CEO





A Commitment to Integrity and Improving Life

At Gore, our commitment to integrity is a foundational part of the Enterprise. We believe that integrity is a vital principle that underpins every interaction and decision we make. Our brand promise, *Together, Improving Life*, encapsulates our dedication to not only enhancing the quality of life for our customers but also fostering a positive impact within our communities and among our Associates.

Integrity is central to our mission, guiding us in our pursuit of excellence and innovation. We uphold the highest ethical standards in our business dealings, recognizing that our reputation and culture are critical to our long-term success. Our fundamental values must not be compromised for short-term gains. The Associates' Standards of Ethical Conduct (ASEC) serves as our guiding framework, reinforcing the principles of integrity and accountability in our endeavors.

The ASEC is designed to promote strong relationships with fellow Associates, customers, suppliers, and the communities we serve. This document is not merely a set of rules; it is a commitment to uphold our values and act in ways that reflect our promise of improving lives together. By conducting our business ethically and responsibly, we protect our reputation and ensure the sustainability of the Enterprise we have collectively built.

While the ASEC may not cover every conceivable scenario, it provides valuable guidance on when and how to seek assistance. We encourage all Associates to familiarize themselves with these principles and to consult this document regularly as part of their professional responsibilities.

Our commitment to ethical conduct extends to our third party business partners, who are likewise expected to adhere to similar standards. In instances where concerns arise, we expect Associates to report such matters through the designated channels described in this document.



Raising Questions and Concerns

Associates are expected to raise ethical concerns that come to their attention. At Gore, we treat all reports of ethical issues seriously. You may choose to report anonymously, except where prohibited by law. If you observe improper conduct, it is your duty to raise a concern, even if you are uncertain whether the situation constitutes a violation of the ASEC.

In addition to being your primary point of contact, your leader can also provide guidance on how best to report a concern or direct you to the appropriate resource.

The [Integrity Helpline](#) is available via telephone, via search on Gore’s [Sharepoint](#), or via any internet connection, or through www.gore.com. It provides a secure avenue for inquiries, concerns, and the reporting of potential violations.

All reported concerns will be treated with confidentiality to the extent possible under applicable laws.

The Enterprise is committed to zero retaliation. You may feel secure to report without fear of retaliation or adverse consequences for your employment. Retaliation against individuals who report concerns in good faith or who participate in an investigation is prohibited.

Upon the raising of an ethical concern, each allegation will be investigated thoroughly and professionally. As Associates, we share the responsibility to cooperate fully during any investigative process. This commitment to open communication is essential for enhancing processes and resolving issues effectively.

Special Expectations for Our Leaders

Leaders within Gore bear an enhanced responsibility for nurturing a culture of high ethics and integrity. They are expected to exemplify our core values, lead by example, and cultivate an environment of honesty and integrity. Leaders must facilitate an understanding of the ASEC among their teams and actively encourage Associates to seek clarification and raise concerns.

When concerns are raised, leaders should respond in a supportive and constructive manner, reflecting our commitment to integrity and collaboration. They must ensure that no retaliatory actions are taken against individuals who voice concerns in good faith and that all issues are addressed promptly and appropriately. Furthermore, leaders should seek guidance from [HR](#), [Legal](#), or [Compliance](#) when confronted with ethical dilemmas.

We provide a range of resources for reporting ethical concerns, including:

Your Leader

A primary point of contact for guidance and support.

HR Associate

Available for assistance with workplace-related matters.

Compliance Team

Offers expertise on compliance issues.

Legal Team

For legal matters requiring specialized knowledge.

Integrity Helpline

Accessible 24/7 for reporting violations confidentially.

CEO and Chairman of the Board

For serious concerns requiring escalation.





Building Relationships Based on Trust

Building strong relationships founded on trust is fundamental to our collective success at Gore. We aspire to create an inclusive work environment in which every Associate feels valued and respected, regardless of their background or identity.

Fairness and Non-Discrimination

We take pride in fostering an environment of [inclusion and belonging](#), guided by our foundational principles of freedom and fairness. Our different backgrounds, cultures and talents give each of us a unique perspective that strengthens our business. These varied viewpoints lead to more creative solutions and effective strategies, making us stronger as a collective.

We each will do our part to maintain an inclusive work environment that treats all people, inside and outside of Gore, with fairness, dignity and respect. We will not make employment related decisions, discriminate against, or engage in disrespectful, biased or intolerant behavior toward anyone on the basis of any characteristic protected by applicable law. Follow [this link](#) for our policy (and additional USA information [here](#)).

Workplace Safety

We are committed to maintaining a safe and secure working environment for all Associates. Associates have a right to work in a clean, safe, and productive environment, free of hazards and threats.

Associates are expected to adhere to health and safety laws, as well as Gore policies and procedures. Should you witness a potentially dangerous situation or unsafe practice, it is your obligation to report it immediately to your leader.

Aggressive behavior in the workplace, including any spoken or written threats, intimidation, or attempts to create fear, will not be tolerated. The possession of firearms or dangerous weapons within Gore facilities is [strictly prohibited](#). If you believe an individual is in imminent danger, contact [Gore Security](#) or local authorities without delay.

[Substance abuse](#) is not acceptable in our workplace. Associates must remain alert and capable of performing their duties and should never work under the influence of drugs, alcohol, or any controlled substances that may impair their judgment or abilities. Even prescribed medications can pose challenges if they compromise your capacity to effectively perform your commitment.

Harassment

Every Associate should feel secure and respected. At Gore, we value relationships based on trust, and harassment, intimidation, or bullying is [not tolerated](#). Harassment can occur in various forms, including verbal, physical, or visual conduct that generates a hostile environment. This encompasses any unwelcome behavior, whether it is sexual in nature or otherwise.

We strongly encourage all Associates to report any instances of harassment or discriminatory behavior to their leaders or the HR team. Leaders are expected to collaborate with HR and other relevant teams to quickly resolve the issues. By addressing harassment and fostering a culture of respect, we contribute to our overarching promise of improving lives.





Making Ethical Enterprise Decisions

All Associates bear the responsibility of making ethical decisions that benefit the Enterprise and align with our brand promise. This includes safeguarding Gore's assets, both physical and intellectual. Each Associate plays a vital role in protecting company property—such as equipment, supplies, and facilities—from loss, misuse, theft, damage, and waste.

Protecting Gore's Assets

Associates are expected to utilize Gore assets wisely and in the best interests of the Enterprise. Limited personal use of company assets is generally deemed acceptable; however, it is essential to adhere to local policies and [Gore's Acceptable Use Policy](#) concerning such use. Potential misuse should be reported to your leader or a member of the HR, Security, Legal, or Compliance teams.

Regarding the use of Gore's network and computer systems, Associates must act in a manner that is both ethical and legal. Gore retains the right to monitor and restrict access to these systems as deemed necessary. When engaging in electronic communication—be it through email, instant messaging, or text—Associates should exercise the same diligence as they would with any other company document. Discriminatory or harassing comments, as well as threatening or abusive language, are wholly unacceptable in all forms of communication.

Conflicts of Interest

As Associates, we must act in the best interest of the Enterprise. A conflict of interest arises when personal interests—whether yours or those of family members—interfere with your ability to act in the best interest of Gore.

In the event that you find yourself in a conflict of interest situation, you must disclose it to your leader via Gore's [Conflict of Interest Disclosure](#) platform. Transparency is critical, and disclosing a potential conflict is the first step towards resolving the issue.

Common types of conflicts of interest include outside employment, substantial financial interests in competing organizations, and the pursuit of personal business opportunities that arise from your position at Gore. Special care must also be exercised in managing [workplace relationships](#), particularly when one Associate directly supervises another or when close personal relationships develop among colleagues.

Creating and Retaining Accurate Records

Accurate record-keeping is vital for all Associates. Each of us is responsible for creating and maintaining business records, which include timekeeping records, contracts, invoices, inventory records, and incident reports. It is crucial to ensure that these records are complete, accurate, and managed in compliance with Gore policies.

Occasionally, Associates must preserve important documents, especially in light of audits, investigations, or pending litigation. If you are notified of a legal hold, you must not alter or destroy any relevant documents until the hold has been lifted. If you have questions about what must be preserved or suspect that someone has improperly concealed, shared, or destroyed records, you should contact the [Legal](#) team immediately.

Beyond these situations, records should be regularly maintained and destroyed according to the applicable retention schedule.





Fairness In Our Business Relationships

Gore is committed to fair business practices and adherence to applicable anti-bribery laws and regulations. This commitment extends to all channel partners and other third parties engaged on behalf of Gore.

Anti-Bribery and Anti-Corruption

Bribery in any form is [strictly prohibited](#) at Gore. Associates must never directly or indirectly offer, promise, or provide money or anything of value to improperly influence a business decision or secure an improper advantage. This includes cash, gifts, entertainment, or favors. Similarly, we do not accept bribes or improper gratuities either.

If you are solicited for improper payments or experience extortion, you must report this immediately to the [Legal](#) or [Compliance team](#). We do not allow facilitation payments, even in regions where they may be considered legal. Adhering to these ethical standards in every aspect of your professional responsibilities is essential.

Third Party Business Partners

When engaging with [channel partners and other third party business partners](#), it is essential to ensure that they share our commitment to ethical business practices. Associates must follow due diligence procedures and are responsible for making sure third parties meet our ethical standards.

Business Courtesies

We must not attempt to gain business advantages by offering or arranging [business courtesies](#) that could be perceived as improper inducements. Business courtesies, such as meals or entertainment, may only be extended in connection with legitimate business activities and must adhere to applicable laws and [Gore policies](#).

Interactions with Healthcare Professionals

Interactions with healthcare professionals are subject to stricter requirements, including specific rules for business courtesies, consulting services, and grant giving activities. Associates can find relevant policies and procedures [here](#), and are encouraged to seek guidance from Gore Medical [Legal](#) or [Compliance](#) as needed.



Fair Competition and Antitrust

Gore is dedicated to fair competition and compliance with [antitrust](#) laws. We compete solely on merit, avoiding any deceptive or dishonest practices. Associates must refrain from discussing sensitive topics with competitors, including pricing strategies, terms of sale, and market allocations.

Privacy

We are committed to safeguarding the privacy of personal data. This includes any data that can identify an individual. The use of personal information is governed by our policies, contracts, and privacy laws. It must be safeguarded from unauthorized access, misuse, or accidental disclosure, and used only for its intended business purpose with appropriate consent.

Data owners are responsible for the accuracy, integrity, and secure handling of personal information. Access to personal data should be limited to those with a legitimate need to know and comply with applicable laws. For additional information, please refer to our Data Privacy [principles, policies and notices](#).

Product Integrity

We are committed to product integrity. Our products do what we say they will do, and we stand behind our products and product claims. In developing and manufacturing our products, we have established and will comply with standards that meet the requirements of applicable laws and regulations. If you have a concern about the quality of our products or processes, please bring it to a leader's attention.

Interacting with a Government Organization

Engaging with government entities requires additional attention to compliance. Whether selling products, submitting data, or participating in inquiries, Associates must comply with local laws and Gore policies. All reports and communications with government agencies must be accurate, truthful, and current.

Particular attention must be paid to restrictions on gifts and hospitality when dealing with government officials. Associates should consult the appropriate policies and seek guidance from the [Compliance Team](#) if uncertain about any interactions.

International Business

When conducting international business, Associates must comply with all relevant laws and regulations, including those governing exports and imports. This includes verifying the eligibility of recipients for materials being exported and ensuring that all required licenses are obtained. The [Global Trade Team](#) can help.

Boycotts present additional challenges in international dealings. Gore will not participate in boycotts that are not sanctioned by applicable governments. Should you receive requests related to such boycotts, you must report them to the [Legal](#) team immediately.





Taking the Long-Term View in Our Communities

Gore is committed to being a responsible corporate citizen. We recognize the importance of considering the long-term impact of our actions on the communities we serve. Our initiatives focus on building strong relationships with local stakeholders and contributing positively to the communities in which we operate.

Environmental Responsibilities

At Gore, we have an [ongoing commitment](#) to meeting all applicable health, safety, and environmental regulations and standards. We carefully consider the effects our products—and our operations as a whole—have on the environment, as well as on the health and well-being of people. We strive to be good stewards of air, water, and energy resources, and in our management of waste.

If you have concerns about a potential environmental issue related to our products, processes, or facilities, bring it to the attention of your leader. Gore will investigate or review all reports and is committed to taking corrective action when necessary.

Respect for Human Rights

At Gore, we are committed to respecting the dignity of all persons and their fundamental, inalienable human rights. 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. The international guidelines we follow and the safeguards we have established in this regard are covered in our [Human Rights Policy](#).

Our human rights standards naturally extend to our supply chain partners. We expect our suppliers to treat their employees and communities with the same respect we treat our own. Our [Supplier Code of Conduct](#) is aimed at ensuring alignment with our suppliers on these expectations.

Political Activities

Engaging in political activities is a sensitive and regulated activity in many jurisdictions and may have to be publicly reported.

Political activities include meeting with government officials, public policy advocacy and making political contributions on behalf of Gore. Before engaging in these activities, please consult with Gore's [Government Relations](#) team. Associates should not make political contributions using Gore funds.

If your commitment involves communicating with government officials in an effort to influence legislative or administrative action—be sure you know and follow the applicable rules.

