

W. L. GORE & ASSOCIATES

ASSOCIATES' STANDARDS OF ETHICAL CONDUCT



Together, improving life

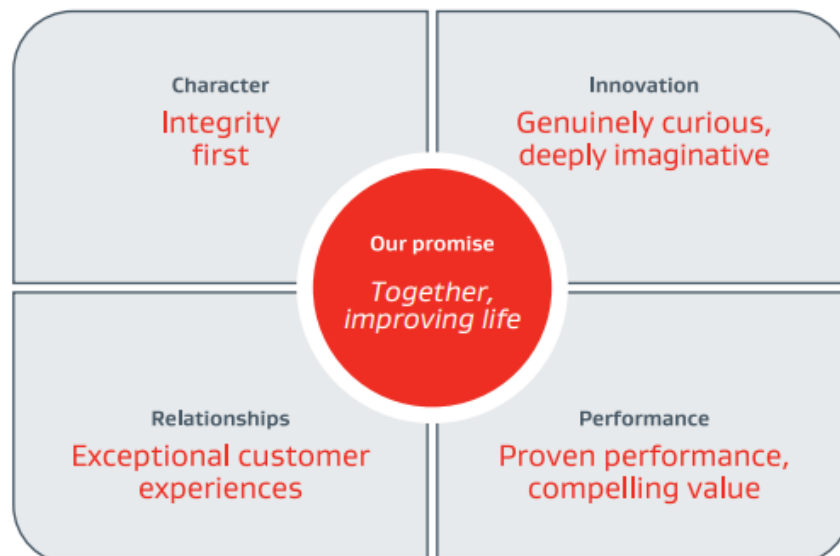


Our brand framework

Our promise is the most succinct articulation of why we do what we do. Our dimensions are how we bring it to life.

Our brand framework is made up of our shared promise — *Together, improving life* — and is brought to life through four dimensions — character, innovation, relationships and performance. For each of these dimensions we have captured an expression that best highlights the meaning of the dimension, embodying an emotional idea that we value, relate to and can be inspired by.

Taken together, these 22 words become the decision-making framework that empowers each Associate across our Enterprise to act in a common interest, with a shared promise of *Together, improving life*.



Dear Associate,

Upholding our legacy of integrity remains central to delivering our promise of Together, improving life, particularly in an external environment characterized by high uncertainty. For our business to thrive, we count on each other to act fairly and ethically in our day-to-day interactions. Doing so sustains trusted relationships, protects our reputation, and enables us to deliver products that do what we say they will do. For guidance on acting with integrity, we look to our Associates' Standards of Ethical Conduct (ASEC), which describes expectations for ethical behavior and compliance with applicable laws and regulations. We have updated our ASEC to make clearer that not only will we treat each other with respect, in keeping with our fairness principle, but also that we will address behaviors inconsistent with our principles and values.

To ensure we are maintaining an environment where all of us can do our best work, we rely on you to speak up and raise concerns when you encounter practices that are inconsistent with our own ethical standards or noncompliant with law. Please discuss any concerns with your leader, sponsor, HR or any member of our Legal and Enterprise Compliance teams. You may also contact the [Integrity Helpline](#) (previously "ASEC Hotline").

Thank you for renewing your commitment to integrity by refreshing your knowledge of the ASEC and completing Annual Ethics Training. If you have questions about its content or related issues, please contact a member of the [Enterprise Compliance Team](#).

Bret Snyder
President & CEO

Table of Contents

- Introduction: A Commitment to High Ethics and Integrity** 5
- Long-Term View 5
- Our Commitment 5
- Raising Questions and Concerns 5
- Special Expectations for Our Leaders 6

- Relationships Built on Trust: Working With Fellow Associates** 7
- Diversity and Non-Discrimination 7
- Harassment 7
- Workplace Safety 8

- All In The Same Boat: Making Good Enterprise Decisions** 9
- Protecting Gore's Assets 9
- Creating and Retaining Accurate Records 10
- Conflicts of Interest 11

- Fairness In Our Business Relationships** 13
- Anti-Bribery and Anti-Corruption 13
- Channel Partners / Third Parties 13
- Business Courtesies 14
- Fair Competition and Antitrust 15
- Privacy 16
- Product Integrity 17
- Interacting with a Government Organization 17
- International Business 17

- Taking The Long-Term View In Our Communities** 19
- Environmental Responsibilities 19
- Political Activities 19

INTRODUCTION: A COMMITMENT TO HIGH ETHICS AND INTEGRITY

LONG-TERM VIEW

At Gore, our commitment to high ethics and integrity is a vital part of taking a long-term view. We believe that our reputation and our culture are critical to our success as an Enterprise and that our fundamental values should never be sacrificed for short-term gain. Above all, we are committed to doing the right thing in all our business dealings.

Our Associates' Standards of Ethical Conduct (ASEC) help to strengthen these commitments by reinforcing the importance of maintaining strong relationships with our stakeholders—such as our fellow Associates, customers, suppliers, and communities.

This document guides the way we act with each other, as well as how we present ourselves to those outside our Enterprise. Conducting business ethically, responsibly, and legally throughout our global organization helps to protect our reputation and the successful Enterprise we have built.

While our ASEC cannot address every circumstance we may encounter at work, it can help us decide when and how to seek help. Use it as a guide, but know you can always turn to additional resources if you still have questions. Our ASEC is just one of the tools available to help ensure we are acting with integrity.

To explore Gore resources, guidelines and policies in greater depth, please visit the [Ethics and Compliance](#) section of the Gore Intranet. Home to guidelines that apply to specific functions, businesses and divisions, this section also holds helpful tools and resources related to common compliance issues.

OUR COMMITMENT

All of us at Gore share a commitment to following our ASEC. We are each expected to be familiar with and follow its principles, and to seek guidance if we are ever unsure how to act. In addition, we need to know and follow the laws and regulations that apply to the work we do, wherever we do business.

If a conflict exists between this Policy, another Gore policy or procedure, or an applicable law, regulation, industry code, or other relevant code of conduct, the more restrictive requirements apply. If there is ever a discrepancy between local law and our ASEC or policies, seek advice from the Enterprise Compliance team before taking action.

Just as we are committed to pursuing business success by creating innovative products, it is essential for us to pursue our objectives while following Gore's ASEC and policies.

We expect the same ethical commitment from our Channel Partners and business partners that we expect from our fellow Associates at Gore. This means that Gore suppliers, agents, distributors, consultants, licensees, vendors, and other business partners have a responsibility to conduct their business in a legal and ethical manner, reflecting similar principles to those outlined in this document. If you encounter situations that concern you, please raise your concern with a resource listed below.

RAISING QUESTIONS AND CONCERNS

Why is it important to report ethical concerns?

Gore takes all reports of ethical concerns very seriously. You are expected to speak up if you see something that doesn't seem right—even if you aren't sure whether the situation poses a conflict with our ASEC. After all, our Enterprise can't take action unless someone raises the issue. Since our ASEC can't address every situation that could arise during the course of our work, it is up to each of us to use good judgment and common sense to make sure our concerns are known.

Resources

There are a number of resources you can turn to if you become aware of questionable behavior or an action that concerns you:

- A leader
- An HR Associate
- The Enterprise Compliance team
- The Gore Legal team
- Our [Integrity Helpline](#)
- The President or Chairman of the Board of Directors

Often, your Sponsor can advise you on how best to report a concern and/or direct you to the best resource.

You can access our Integrity Helpline — by phone, through the Gore Intranet, or using any internet connection — 24 hours a day, seven days a week to ask a question, express a concern, or report a possible violation.

Where local law allows, you may report anonymously, though please keep in mind that this can make it more difficult for Gore to properly investigate your concern. The concerns you report will be logged by an independent third party and addressed promptly. Our Enterprise treats reported information in a confidential manner to the extent reasonably possible and allowed by local law.

You can find more information about our Integrity Helpline, including the telephone number for your country, at <http://goreethics.com>.

Good faith reporting and non-retaliation

Our Enterprise is committed to creating an atmosphere of non-retaliation, where all of us feel comfortable speaking up when we have concerns. You may always make a good faith report of any suspected violation of our ASEC, other Gore policies, or the law without fear of retaliation or any negative impact on your employment.

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.

Good faith means that you provide information honestly, with a sincere intention to deal fairly with others, and the information is true to the best of your knowledge. It does not matter if it later turns out that you were mistaken.

Investigations and corrective actions

When a concern is reported, every allegation will be investigated or reviewed in a professional manner. As Associates, we have a shared duty to cooperate fully in any investigation. This commitment to speak up and report concerns applies to everyone in our Enterprise, and contributes to the openness and direct communication that help us to improve processes and resolve issues.

Violations of our ASEC, Gore policies, or the law may carry serious 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.

Remember, such behavior places all of us at risk of damaged reputation, jeopardizes our relationships with our stakeholders, and may subject us — as individuals and as an Enterprise — to civil or criminal liability.

SPECIAL EXPECTATIONS FOR OUR LEADERS

Our leaders have additional responsibilities for creating an ethical culture. In particular, our leaders are expected to model our culture, lead by example, and foster an environment of honesty and integrity. Further, they must help other Associates understand and comply with our ASEC and encourage them to ask questions and raise concerns. When others raise concerns, our leaders should handle their questions and reports appropriately. This means never taking or tolerating retaliatory action against anyone for speaking up in good faith, and contacting a member of the HR, Legal or Enterprise Compliance teams for help when needed.

RELATIONSHIPS BUILT ON TRUST: WORKING WITH FELLOW ASSOCIATES

DIVERSITY AND NON-DISCRIMINATION

Because we believe in the power of small teams, we value our diverse workforce and inclusive work environment. Our different backgrounds, cultures, and talents give each of us a unique perspective that strengthens our business. Having many points of view helps our teams come up with more creative ideas and ways of reaching our goals. In short, Gore is stronger because we respect and value diversity.

We each will do our part to maintain an inclusive work environment that treats all people, inside and outside Gore, with fairness, dignity, and respect, and reflects the diversity of the communities where we operate. We will not make employment related decisions, discriminate against, or engage in disrespectful, biased or intolerant behavior toward anyone on the basis of race, color, religion, gender, pregnancy, sexual orientation, gender identity or expression, marital status, national origin, disability, age, or any other characteristic protected by applicable law.



HARASSMENT

Everyone should feel secure and respected when they come to work each day. We value relationships built on trust, and harassment, intimidation, and bullying will not be tolerated at Gore.

Harassment can take many forms and means different things in different parts of the world. At Gore, harassment is any intimidating, offensive, demeaning or unwelcomed conduct that creates a hostile, uncomfortable environment for others and any other forms of harassment prohibited by applicable law. It can be verbal, physical, virtual or visual. Harassment can also be sexual in nature. No matter what form it takes, harassment has no place within Gore.

If you experience or witness any form of disrespectful, biased or intolerant behavior, discrimination, harassment, intimidation, or bullying, you are encouraged to report it to your leader or a member of the HR, Legal or Enterprise Compliance teams or the [Integrity Helpline](#). Remember, Gore will not tolerate retaliation against you for coming forward with a good faith report.

Leaders who become aware of behaviors reflecting intolerance, discrimination, or harassment on their team are expected to work with their HR partner and other functional experts as needed to address and resolve the situation.



WORKPLACE SAFETY

Gore values the health and safety of all Associates, which is why our Enterprise takes measures to ensure the safety and security of our workplace. Each of us has the right to work in a clean, safe, and productive environment. We owe it to each other to keep our work spaces free of hazards.

We are also expected to follow health and safety laws as well as Gore policies and procedures. If you witness a dangerous situation or practice, you have a duty to report it immediately to a leader.

Yang, an Associate in one of our production facilities, notices that a machine he works with isn't calibrated correctly, so its product measurements are a little bit off. The discrepancy is very small, and Yang figures he can just make do with it for the rest of the day, instead of bothering anyone about it. Is he doing the right thing?

No. Yang should talk to his leader immediately about the problem with the machine. By not addressing this issue, Yang could be lowering our product quality or even endangering his fellow Associates. All of our equipment must be kept in good working order and properly calibrated, so we can avoid injury and create the fit-for-use products we promise our customers. Even if it means stopping production briefly to repair a machine, we all need to follow proper safety and manufacturing protocols.

Workplace violence

We also keep our workplaces safe and productive by not tolerating threats or acts of violence. It should go without saying that violent behavior—including both spoken and written threats, as well as intimidation and attempts to instill fear in others—is not tolerated at Gore. If you think that someone is in imminent danger, immediately call Gore Security or local authorities.

Substance abuse

To keep ourselves and our fellow Associates safe, we need to be alert while we're on the job. We must never perform work or act on behalf of our Enterprise while under the influence of drugs, alcohol, or any controlled substance that could impair our ability to make sound judgments and perform our duties. Keep in mind, even appropriately prescribed medication can present a problem if it impairs your ability to work safely.



ALL IN THE SAME BOAT: MAKING GOOD ENTERPRISE DECISIONS

PROTECTING GORE'S ASSETS

Physical property, funds, facilities

All of us have contributed to the success that Gore enjoys today. Likewise, we each play a role in protecting Gore property—such as equipment, supplies, facilities, and funds—from loss, misuse, theft, damage, and waste. Access to certain assets may require prior approval. As Associates, we are expected to use Gore assets wisely and only in the best interest of the Enterprise, invest them well, and preserve them for the benefit of the Enterprise. Limited personal use of Gore assets is generally appropriate. However, we must know and follow local policies with respect to such use. Keep in mind that any potential misuse should be reported to your leader or a member of the HR, Legal or Enterprise Compliance teams along with Gore's Security team. In the event the misuse of assets is identified, appropriate action will be taken including disciplinary action up to and including termination.

In the office supply room, Jonathan notices a few old computer monitors that no one is using. He could really use another monitor for his home computer, and he's pretty sure no one will notice if he takes one. Is Jonathan allowed to take a monitor?

No, he is not. Jonathan may not take the Gore property for his personal use without appropriate approval, even if it is not currently being used in the workplace. If a fellow Associate is misusing Gore property, you should speak up about your concerns. We all have a responsibility to protect our Enterprise and its assets.

Use of Gore property and assets

Our responsibility to use Enterprise assets appropriately means we use Gore's network and computer systems in an ethical and legal manner. We should follow local policies regarding personal use of these systems as we do with other Gore assets. In all cases, Gore reserves the right to monitor and, when appropriate, block our use, except when prohibited by local law. This includes all data and communications transmitted by, received by, or contained in Enterprise email or voicemail accounts, as well as all electronic documents maintained on Enterprise computers and mobile devices.

Remember to compose emails, instant messages, and text messages with the same care you would take in composing any other Gore document. Electronic messages can easily be copied and forwarded without your knowledge or consent. Remember that discriminating or harassing comments and threatening or abusive language is unacceptable in any communications using Gore's systems—just as it would be in person.

Confidential information and intellectual property

One of our most important assets is our knowledge and experience. Our success relies not only on continued innovation, but also on careful safeguarding of our products, processes, and knowledge through the use of Enterprise best practices for handling Gore intellectual property. Gore's confidential information is a valuable resource, so it is our duty to protect it from loss, theft, and misuse.

Our confidential information can take many forms, for example:

- Customer lists
- Marketing and strategic plans
- Terms and conditions, rates, or fees offered to specific customers
- Formulas and technical information
- Intellectual property such as trade secrets or unsubmitted patent applications

Because our confidential information is so critical to our business goals, disclosure of confidential information outside of the Enterprise should only be done in consultation with business leadership and protected by the appropriate confidential disclosure agreement. We must also be careful that we don't inadvertently reveal confidential information by failing to adequately protect it.



How can I protect Gore's confidential information?

- Never disclose trade secrets or any confidential information unless there's a legitimate, authorized business reason for doing so and proper documentation is in place.
- Ensure that appropriate legal protection is used, such as a confidential disclosure agreement.
- Always properly secure your computer, documents, and other sensitive materials.
- Avoid discussing confidential information in places where you may be overheard, such as restaurants, taxis, airplanes, or elevators.
- Remember that these obligations continue even after your employment with Gore ends.

Gore's continued success also depends on our research and development efforts. These efforts involve the creation and use of intellectual property, including trade secrets. To the extent permitted by law, any invention or other intellectual property you create during working hours, with Gore resources, or as part of your work, belongs to our Enterprise.

We should be mindful of the intellectual property rights of others. For example, we license the use of third-party intellectual property, particularly software, and we need to be careful that our use does not violate any applicable licensing requirements. Similarly, we may not use software or any other information that has been pirated or stolen in any way.

If you have questions about the use or disclosure of confidential information, or suspect that an improper release of confidential information has occurred, you should immediately notify your leader or the Legal team.

Social Media Standards and messaging apps guidelines

Social media and other online forums have redefined the way we communicate with friends, family, fellow Associates, and others. When using social media, it's very possible that we may encounter situations where we're unsure what and how much to say about our work at Gore.

The most important guideline may also be the most obvious: as a Gore Associate, you must be careful not to disclose confidential Gore information through social media. You also need to be clear that, though you work for Gore, your opinions are your own. And finally, always remember to use good judgment online, considering the potential impact of your words before posting.

For more information, see the [Social Media Standards and Best Practices for Gore Associates' Personal Use](#) and the [Social Media Standards and Best Practices for Associates who Manage Gore-Owned Channels](#).

In addition, communicating through instant messaging or communications apps, platforms or tools ("Messaging Systems"), including text or WhatsApp, may create risk that Gore information is not appropriately maintained or is less secure. Associates are responsible to ensure compliance with applicable Gore policy.

CREATING AND RETAINING ACCURATE RECORDS

All of us, in some way, are responsible for creating and maintaining business records. Examples of business records include timekeeping records, contracts, invoices and receipts, documentation of services rendered, inventory records, and incident reports, among other documents.

We must ensure the accuracy and completeness of business records in all business processes or financial systems. This means we have appropriate supporting documentation and never provide false or misleading information or intentionally misclassify or omit transactions.

Just as important as the content of our records is making sure these records are managed properly. Doing so allows us to meet our business requirements and ensure our records are available when we need them.

We should follow the Gore Records Retention Program and retention schedules in the locations where we operate. They prescribe the length of time for which we should maintain business records, and the way in which documentation should be destroyed.

Make sure to preserve important or relevant documents in the event of an audit, investigation, or pending litigation. And of course, be sure to follow any legal hold notice you may receive, never altering or destroying documents before the hold has been lifted. If you have questions about what must be preserved or believe that anyone has improperly concealed, altered, or destroyed a record, you should contact the Legal team.

If Gore is being investigated or is involved in a lawsuit, we will issue a legal hold to be sure that documents related to the investigation or lawsuit are preserved.

CONFLICTS OF INTEREST

As Associates, we have the responsibility of making decisions and taking actions that are in the best interest of the Enterprise. Fundamentally, “the Enterprise” is all of us, who act with an owner’s mindset and share in the benefits of our continued success.

Together, we are responsible for sustaining an engaging Enterprise built on inclusiveness, striving to be fair with each other and everyone whom we do business. As part of that commitment, some boundaries are necessary between Associates’ personal and business interactions to achieve a productive and comfortable work environment.

We all need to be aware of and address situations that create a perception or reality of unfair influence and/or conflicts of interest.

A conflict of interest is a situation where our personal interests (or those of our close family members) could or actually do interfere with our ability to serve Gore’s best interests. In these situations, the danger is that the conflict could encourage us to show favoritism toward a person or organization at the expense of our Enterprise. As Associates, we have a duty to work on Gore’s behalf, and conflicts of interest can put that commitment into question.

It is best to avoid any situation that may result in or create the appearance of a conflict of interest. If you are involved in a conflict situation, disclose it to your leader right away through Gore’s Conflict of Interest Disclosure platform. You can find more information and a link on the Gore Intranet at [Conflict of Interest](#).

Associates must always disclose conflicts of interest in the platform, whether they are actual, perceived or potential. It is important to note that disclosing it to your leader or in the tool is simply the first step in determining the appropriate path for managing the situation. If you have any question about whether your situation presents a conflict, you should discuss it with a knowledgeable leader or a member of the [Enterprise Compliance Team](#).

The following are some of the more common types of conflicts.

Outside employment

Gore generally does not limit our ability to hold jobs outside of our Enterprise, although written approval from Gore may be required in some countries. If you do choose to pursue another job or an independent business venture, be sure that it doesn’t interfere with your Gore commitments or your obligations under the law. If you are not sure whether employment with another company or independent business venture will pose a conflict of interest, check with your leader. Further, employment with a company you know is a Gore competitor, supplier, or other business partner always requires prior approval from your leader, since this can easily present a conflict of interest.

Financial interest

If you (or a family member) have a substantial financial interest in an organization that competes with our Enterprise or works with Gore as a business partner (for example, a supplier, vendor, or contractor), you may feel pressured to favor the outside organization over Gore in your business decisions. This pressure to favor the other organization means that an actual or potential conflict likely exists. If you find yourself in such a situation, you should make a disclosure in Gore’s Potential Conflict of Interest database and notify your leader.

Corporate opportunities

We should be careful not to pursue a personal business opportunity, such as Board membership or consultancy, that was discovered through an Enterprise asset or position without prior approval by Gore's Intellectual Property (IP) Committee. This includes using Gore property, time, or information to advance others' business interests.

Relationships in the workplace

When Associates have close personal relationships within the Enterprise, conflicts of interest may arise where:

- One of the Associates is the leader or sponsor of the other,
- One Associate directly reviews or gives input on the contribution and/or development of the other, or
- The two Associates work closely on the same team.

Similarly, relationships with others outside Gore may also lead to conflicts of interest. Some examples could include but are not limited to:

- An Associate's spouse works for a Gore competitor,
- An Associate's family member owns a vendor which is attempting to engage Gore in business,
- An Associate's sibling is a public official who interacts with Gore in a professional capacity, or
- An Associate has been awarded a raffle prize or gift box from a vendor that is unable to be shared with a broader team (e.g. an iPad or AirPods).

It is especially important to disclose relationships with Healthcare Professionals and Government Officials in order to navigate those engagements with proper care and diligence.

Please see the "Close Personal Relationships in the Workplace" guidance located on the HR Information page of the intranet. This can be found by navigating to the Human Resources tab.

Bridget, an Associate who was responsible for administering a contract with a vendor, developed a personal relationship with the owner of the company. Upon learning that the owner was having financial difficulty, the Associate made a personal loan to the owner with agreed repayment terms. Is this a potential conflict of interest?

Yes. At a minimum, others could perceive that Bridget can no longer objectively manage the contract solely in Gore's best interests. Matters like this should be discussed with leaders in advance and disclosed in Gore's Conflict of Interest platform.



FAIRNESS IN OUR BUSINESS RELATIONSHIPS

ANTI-BRIBERY AND ANTI-CORRUPTION

To comply with the law and be a fair and responsible member of our business community, we will never participate in bribery or other corrupt practices. Our Enterprise follows global anti-bribery and anti-corruption laws wherever we do business, regardless of local law or custom. This means we never directly or indirectly (through a Channel Partner or any other Third Party) offer, attempt to offer, promise, authorize, or provide money or anything of value to anyone to improperly influence an act or decision or to secure an improper advantage to obtain or retain business, a government service, or a favor.

A bribe can be money or anything of value, including but not limited to:

- Cash or a cash equivalent (e.g., “red envelope / red packet,” gift cards, etc.)
- Gifts
- Entertainment
- Travel or hospitality
- Charitable or political contributions
- Business or employment opportunities
- Discounts
- Favors

In addition, we never solicit or accept improper activity or a kickback. A kickback is the return of a sum already paid or due to be paid as a reward for awarding or fostering business. The difference between an illegal kickback and a legitimate rebate or discount may appear minor but is very important. Please consult with the applicable Division Compliance team if you have concerns or questions.

Gore does not pay facilitation payments, even if we are working in locations where they may be legal or a common practice. A facilitation payment is a payment, no matter how small, made to expedite a standard government service, such as processing a permit, providing police protection, or expediting utility services.

All of these requirements apply to any Channel Partner or Third Party engaged on behalf of Gore, making it all the more important to carefully monitor the individuals and companies hired by our Enterprise.

If you are solicited regarding improper activity or are compelled to make an extortion payment under imminent threat of physical harm, you must report this to the Legal or [Enterprise Compliance Team](#) as soon as possible.

Anjay is coordinating a significant renovation of a Gore facility, and he forgot to file a required permit with the municipal government. Without this permit, he can't open the facility on time, and the delay will substantially increase Gore's investment in the project. When he goes to the local government office to see if they can expedite the permitting process, the agent tells Anjay that there's nothing she can do—unless Anjay will make a donation to her daughter's school. Anjay knows this is not a standard service charge, but he really needs to get that permit.

What should he do?

Anjay cannot pay this money to the agent or to her daughter's school. This payment would qualify as a bribe, which Gore strictly prohibits. To conduct business ethically and legally, we cannot offer or accept bribes, whether in the form of cash, payments to a third party, or other items of value. If you are ever offered or asked to make a bribe, tell a member of the Legal or Enterprise Compliance teams immediately.

Channel Partners/Third Parties

Gore seeks to work with Channel Partners that share our commitment to conducting business ethically. Channel Partners are defined by each division and may include but not be limited to distributors, agents, dealers, Trademark Licensees (TMLs), and Value Added Resellers (VAR's). Gore prohibits any Channel Partner or Third Party (including any Third Party the Channel Partner engages) to engage in bribery or any corrupt practices on Gore's behalf. Channel Partners must adhere to the same ethical standards as Associates. In addition, Associates must follow all requirements to engage with Channel Partners, such as anti-bribery and anti-corruption due diligence and ethics certifications and training, as applicable.

BUSINESS COURTESIES

We do not try to obtain or retain business by offering, paying for, or arranging business courtesies such as meals, travel, entertainment, or gifts as improper inducements.

Business Courtesies may only be provided in connection with legitimate scientific, educational, and/or business activities. Associates must ensure business courtesies are in accordance with applicable Gore policies, applicable laws, regulations, or industry-specific guidelines. All Business Courtesies should be infrequent and modest. No cash or cash equivalent, such as gift cards, may be provided.

When working with Government Officials and Healthcare Professionals – there are certain laws which limit or prohibit providing gifts and entertainment to Healthcare Professionals and Government Officials. As Associates, we are responsible for knowing these restrictions, understanding the applicable Gore policies, and consulting with appropriate Associates, including the Enterprise Compliance or Legal team as needed.

These requirements also apply to any Channel Partner or Third Party providing business courtesies on Gore's behalf as well as any Associate receiving any Business Courtesies.

For Division-specific guidance, please refer to the applicable [Business Courtesies policies](#) found on the intranet.

Alexander is a Gore sales Associate. He has a good working relationship with a significant Gore customer who is neither a Government Official nor a Healthcare Professional. In fact, Alexander has been in charge of this customer's account for more than five years now. Beyond the occasional business dinner, Alexander doesn't often exchange business courtesies with our customers. However, he'd like to do something nice for this particular customer over the holiday season. What would be an appropriate way to express his gratitude?

A thoughtful, non-cash gift of a nominal value—a modest gift basket, holiday cookie tin, or other inexpensive seasonal item—is a good starting point. These types of gifts generally aren't significant in terms of cost and can be shared with others. Alexander should be very careful not to send anything too extravagant, especially since he doesn't normally send gifts to clients. This could create the appearance of favoritism or bias. Finally, Alexander should ensure that any gift he offers the customer is legal and in line with the customer's own policies on gifts and entertainment. If he has questions about whether a specific item would be appropriate, Alexander should talk to his leader before giving it.

Note that any gifts to Government Official or Healthcare Professionals are not permitted.



FAIR COMPETITION AND ANTITRUST

Because we value fair relationships, we compete solely on merit— never through deceptive or dishonest practices. We compete for business opportunities vigorously, fairly, ethically, and legally. We never misrepresent or manipulate information in order to gain an advantage. We promote our products based on their performance and benefits, not by disparaging or making false claims about our competitors.

We are careful to follow the competition laws that apply to us wherever we do business. Competition laws (also known as antitrust laws) are designed to maintain a level playing field for all businesses by prohibiting practices that unreasonably restrain trade.

Competition laws generally forbid entering into arrangements with competitors—even through distributors or suppliers—that may restrain trade. It doesn't matter whether the arrangement is made through a formal contract, a handshake, or simply an informal conversation—there are some topics that we simply may not discuss with our competitors. Here are some examples:

- Pricing (including the resale pricing) of products or services
- Pricing policies or strategies
- Terms or conditions of sale
- Production volume
- Discounts and promotions
- Market or customer allocations
- Whether or how to deal with a particular customer or supplier

Always exercise caution when attending trade events, seminars, or industry conferences or participating in trade association activities. If one of Gore's competitors attempts to discuss any of these topics with you, stop the conversation immediately, walk away and report the incident to a member of the Legal or [Enterprise Compliance Team](#).

Gore is engaged in a number of highly competitive bids for key government contracts, or "tenders". Erik, a sales Associate, received a phone call from a top employee of a competitor who is also bidding on the same tenders. He asks Erik whether Gore would be willing to meet and discuss options for Gore and the competitor to cooperate so both companies can win some, but not all, of the tenders. Erik decides to meet with the employee but only to listen to the proposal and then discuss the matter with his leader. Is this ok?

No. By merely meeting with the competitor, Erik could be perceived as cooperating and forming a "cartel". Creating a cartel is a very serious offense under antitrust laws even if none of the intended results are realized. Erik should have firmly refused the offer to meet the competitor and immediately communicated the matter to his leader and the Legal team.



Gathering and handling competitive information about others

Sometimes we have access to information about our competitors that could give Gore a business advantage. It is important that we act legally and ethically at all times with respect to this information.

When seeking a competitive advantage, use only publicly available information that you obtain lawfully and ethically. Even if it may be legal to use competitive information, it may not be ethical to do so.

We should never exchange sensitive and confidential information with a competitor. If confidential information about a competitor is deliberately or inadvertently disclosed to you, you should discuss its disclosure with the Legal team.

An Associate, Stefan, wants to analyze a competitor but realizes direct discussions with the competitor would be inappropriate. The Associate decides to hire an independent market research firm to contact the competitor and obtain the information. Is this acceptable?

No. Using a third party to conduct work that Gore Associates should not conduct ourselves is the same as directly contacting the competitor. Entering a discussion with a competitor is a waterline issue requiring leadership consultation in advance.

PRIVACY

Our Enterprise is committed to protecting the privacy of personal or otherwise sensitive information—that of our fellow Associates, as well as our customers, vendors, patients and other third parties. Protection of personal privacy is a key part of maintaining fairness in our business relationships, and as such it is very important to us here at Gore.

Personal information is any information that can be attributed or used to identify an individual, such as:

- Contact information
- Employment history
- Marital status
- Government-issued identification numbers
- Credit and debit card numbers
- Consumer data

The use of such information is governed by our policies and procedures, as well as any contracts or agreements we have in place with our third parties. It is also protected by various privacy laws. Therefore, it is important that we not only understand how to identify personal information, but also how to protect it from accidental disclosure or other improper use. We must ensure that we provide the appropriate notice as to how we will use the personal data we collect and ensure that we use it only for those purposes unless we receive the subject's consent to use it in a different manner.

If you are a "data owner" at Gore—meaning you authorize or control access to certain data and are responsible for its accuracy, integrity, and timeliness—you have a responsibility to ensure this information is properly stored, transferred, and utilized. In all situations, it is important that you limit access to consumer data and personal information that our Enterprise owns, controls, or processes. You should help ensure that the information is used only for its intended business purpose, never sharing it with anyone inside or outside of Gore who is not authorized to access it and does not have a need to know it.

Finally, if you are working with any third parties on Gore's behalf, it is your responsibility to make sure those parties handle personal information appropriately, in line with any governing laws, contractual requirements or non-disclosure agreements. For more information, see our Privacy Policy.

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

When we are interacting with a government organization or an organization that contracts with a government organization, special laws and regulations apply. Whether we are selling products to a government customer, submitting new product data to a government agency, or are involved in other ways, we have extra responsibilities in these situations. They include:

- Following the laws that place restrictions on giving gifts, hospitality, and entertainment which can be stricter for Government Officials than for our other business partners. (Please also see the Business Courtesies section.)
- Ensuring all reports, certifications, and statements to the government are current, truthful, accurate, and complete.
- Assigning all time allocations and costs to the proper category and the appropriate contract.
- Knowing and complying with all contract requirements.

In certain situations, you may have contact with a Government Official or be asked to provide information on Gore's behalf to a government or regulatory agency, in connection with an inquiry or investigation. Because it is vital to ensure that you have all the information you need, and all such information is accurate and appropriate for the purpose, speak to the Legal team before providing any non-routine information to a government or regulatory agency on behalf of our Enterprise.

In addition, all employment offers should be based on merit and not performed as a personal and/or business "favor". Offering employment to a Government Official or a person connected with a Government Official(s) or HCP may present risk of bribery or corruption and HR and/or Compliance should be consulted in advance.

INTERNATIONAL BUSINESS

Handling imports and exports

Export activity includes shipping, hand carrying, disclosing, or otherwise transferring a product, technology, or piece of information to another country or to a citizen of another country, no matter where that person is located. When we handle exports, we should verify that both the location of delivery and the recipient are eligible to receive the materials being exported. We also are responsible for obtaining all required licenses.

Import activity, or bringing the goods we purchase from a foreign or external source into another country, is also generally subject to various laws and regulations. Specifically, this activity may require us to pay duties and taxes, submit certain filings, and accurately describe and value the goods.



Trade sanctions and boycotts

A boycott occurs when a person, group, or country refuses to do business with other people or countries as a means of protest. At times, boycott language can be difficult to identify, but it is typically found in contracts, invoices, or shipping documentation. We will not cooperate with boycotts that are not approved by the U.S. or other governments that have jurisdiction over Gore activities. If you receive or suspect you have received such a request, immediately report it to the Legal team.

In addition, we do not do business with individuals or organizations that have sanctions imposed against them. Sanctions can restrict or prohibit our dealings with certain countries—or individuals, banks, or companies located in those countries. These sanctions may prohibit dealings such as transferring assets, monetary payments, providing services, exporting sensitive technology, and traveling to the affected countries.

There are a variety of laws and regulations that apply to our trade activities. Trade laws can be complicated. For more information or if you have any questions or concerns, please contact a Trade Compliance Associate or member of the Legal team in your region.



TAKING THE LONG-TERM VIEW IN OUR COMMUNITIES

ENVIRONMENTAL RESPONSIBILITY

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, immediately bring it to the attention of your leader. Gore will investigate or review all reports and will take corrective action when necessary.

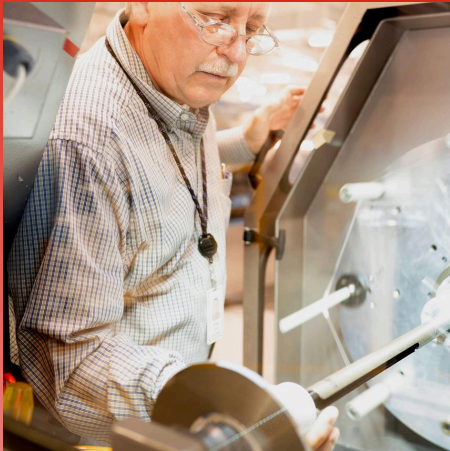
POLITICAL ACTIVITIES

As an Enterprise, Gore will only engage in the political process when legally permitted to do so. We should consult Gore's government relations Associates before making a contribution on Gore's behalf to a political party or candidate anywhere in the world. Further, if your job involves lobbying activities—in short, communicating with government officials in an effort to influence legislative or administrative action—be sure you know and follow the rules that apply to you for registration and reporting of these activities.

In certain jurisdictions, lobbying activities are prohibited. As Associates, we are all encouraged to personally participate in the political activities of our choice, as long as it is done on our own time and at our own expense. We never use Gore resources for our personal political activities nor should we suggest that we represent the Enterprise when we do not have permission to do so.



Together, improving life



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