

# GORILLA GLUE

# 2024 REPORT

REPORTING FOR THE BILL S-211: FIGHTING AGAINST  
FORCED LABOR AND CHILD LABOR IN SUPPLY CHAINS  
ACT



# TABLE OF CONTENTS

INTRODUCTION .....	3
BUSINESS STRUCTURE .....	4
SUPPLY CHAIN .....	5
POLICIES AND DUE DILIGENCE PROCESSES ....	6
REPORTING .....	7
RISK ASSESSMENT & AUDITING .....	8
ATTESTATION .....	8

THE GORILLA GLUE  
COMPANY LLC



# INTRODUCTION

This statement is made by The Gorilla Glue Company LLC ("Gorilla" or "Gorilla Glue") in accordance with Bill S-211 "An Act to enact the Fighting Against Forced Labor and Child Labor in Supply Chains Act (the "Act") for the period January 1, 2024 – December 31, 2024 ("Reporting Period").

In compliance with the Fighting Against Forced Labor and Child Labor in Supply Chains Act (S-211), Gorilla is committed to promoting ethical labor practices and eliminating forced labor and child labor within our operations and supply chains. This report outlines the measures taken during the 2024 fiscal year to identify, assess, and mitigate the risk of such practices.



# BUSINESS STRUCTURE

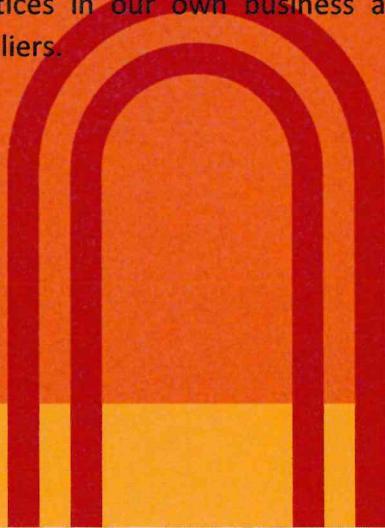
The Gorilla Glue Company LLC is a US-based company, trading under the brands "Gorilla" and "O'Keeffe's" throughout North America including Canada, the United States, and other parts of the world.

Our goal at Gorilla is to provide a workplace and culture where everyone is treated fairly and provided with the opportunity to better themselves. We are committed to operating with high ethical standards, including respecting human rights. Gorilla operates by 5 core values:

- Have fun, be passionate and show it.
- Act with integrity and respect in all relationships.
- Communicate openly and appreciate the efforts of others.
- Embrace knowledge, growth, and change.
- Strive for excellence in what we do every day.

These guiding principles are the foundation of how we operate. Not only do these principles guide our path, but also with whom we work. We openly communicate with our supply chain and work with businesses that will benefit with our partnership. We operate with high integrity and work to continuously improve our products and relationships.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, enslavement, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure ethical work practices in our own business and in our partnerships with customers, contractors and suppliers.



# SUPPLY CHAIN

We recognize that each supplier must operate within their country's legal requirements. In addition to those requirements, we require suppliers to adhere to the requirements set forth by our standards. As part of our contracting processes, we include specific prohibitions against the use of forced or trafficked labor, or anyone held in slavery or enslavement, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. We retain the right to audit and review suppliers' labor practices to ensure that our standards are met and may choose a third party to perform an assessment at our discretion.

The Gorilla Glue Company expects that all suppliers will abide by all applicable international and local laws, rules and regulations in the manufacture and distribution of products and/or services. We want to ensure that suppliers are clear about our expectations, embrace and adopt our values, drive improvements, and deliver on our objectives of trading ethically and responsibly. All suppliers are strongly encouraged to exceed Gorilla Glue's guidelines and promote continuous improvement throughout their operations. Doing so will reduce risk for us, our customers and our suppliers. It will encourage a more resilient, collaborative, safer and transparent working relationship. Gorilla Glue employees communicate our zero-tolerance approach towards modern slavery to suppliers, contractors, and business partners from the outset.



# POLICIES AND DUE DILIGENCE PROCESSES

We have implemented the following policies and processes to prevent, and address forced labor and child labor:

- Supplier Standards (located within our Supplier Agreement) that outline expectations for ethical labor standards, including the prohibition of child and forced labor. **See Appendix 1.**
- Child Labor Policy, which outlines our commitment, definitions, prohibited practices, and prevention and protection measures, corrective actions and reporting. **See Appendix 2.**
- Third-Party Audits - Sedex Questionnaire and SMETA audit. **See details in Risk Assessment and Auditing section.**
- Mechanisms and Grievance Procedures accessible to workers, contractors, and suppliers. **See details in Reporting section.**



# REPORTING

In addition to normal reporting lines and methods, Gorilla Glue has a global ethics hotline IntegraReport which allows anyone including employees, and non-employees, suppliers and their employees, to report suspected improper, unethical or illegal conduct, misconduct and other concerns, including any violations of human rights, via telephone, email or internet submission. Reports can be made anonymously, and the identity of individuals making or involved in a report will be protected, in accordance with local law. All submitted reports are analyzed and routed to the appropriate persons within Gorilla for review, assessment and, if appropriate, investigation as part of our formal grievance process. This hotline is communicated and available to Gorilla employees through internal training, signs are posted on all communication boards throughout the facility, is located on page 14 of our Employee Handbook and is accessible via our intranet (GorillaNet). This service is available 24 hours a day, 7 days a week and 365 days a year by calling toll free at 833-212-7779 or visiting [gorillaglue.integrareport.com](http://gorillaglue.integrareport.com).

Gorilla does not tolerate any form of retaliation against any individual who reports or participates in the investigation of any suspected unlawful conduct, including conduct that violates our position on human rights. Our suppliers are required to provide a complaint mechanism, free of threat of reprisal, intimidation or harassment, for workers to report workplace grievances and violations.



# RISK ASSESSMENT & AUDITING

We are members of Sedex, an independent ethical data exchange. Sedex is a global data platform that helps businesses manage and improve sustainability practices within their supply chains, including addressing and mitigating risks related to forced labor, child labor and modern slavery. Our risk management controls are rated as "Advanced".

In 2024, we underwent an independent Sedex Members Ethical Trade Audit (SMETA) audit by SGS. SMETA focusses on labor standards, health and safety, environmental performance, and ethics within our operations. The purpose of the SMETA audit is to safeguard workers from unsafe conditions, excessive work hours, discrimination, inadequate pay, and forced labor. The audit did not identify any non-conformances related to forced labor, child labor or modern slavery.

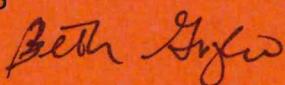
## ATTESTATION

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above, being The Gorilla Glue Company LLC. 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 Period.

Name: Beth Giglio

Title: Chief Human Resources Officer

Date: 5/5/2025

Signature: 

*I have the authority to bind The Gorilla Glue Company LLC.*



# APPENDIX 1 – Supplier Standards



## **Supplier Standards**

Gorilla Glue considers collaboration with the supply chain an integral part of its success and therefore strives to operate as an integrated team with its suppliers. The selection of suppliers is based not only on the quality and competitiveness of their products and services, but also their adherence to social, ethical and environmental principles. The requirements below are applicable to suppliers of Gorilla Glue globally. Suppliers are also expected to be familiar with the business practices of their suppliers and subcontractors, and ensure they operate according to these requirements. Gorilla Glue may discontinue its relationship with Suppliers who fail to comply with these requirements.

### **Child Labor**

Supplier will not employ child labor, consistent with the principles contained in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, in supplying products or services to Gorilla Glue. This includes that the Supplier or Supplier's sub-suppliers or contractors will not employ workers under the age of 15, except in those developing countries where there are certain exceptions to this, and a minimum age of 14 years may therefore be applied where the economy and educational facilities are insufficiently developed.

### **Forced Labor**

Supplier shall not participate in human trafficking; use forced, involuntary, or slave labor; or purchase materials or services from companies using forced, involuntary, or slave labor. They must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business.

### **Hiring and Employment Practices**

Supplier's hiring practices must include verification of workers' legal right to work in the country and ensure that all mandatory documents, such as work permits, are available. Supplier must also prohibit discrimination based on race, color, gender, national origin, age, disability, maternity, sexual orientation, or marital status.



## **Compensation and Working Hours**

Supplier must comply with applicable wage and hour labor laws and regulations governing employee compensation and working hours.

## **Health and Safety**

Supplier must provide employees with a safe and healthy working environment and shall ensure compliance with all applicable health and safety laws and regulations. Supplier shall take proactive measures to support prevention of accidents and occupational diseases, such as provide appropriate health and safety training and risk assessment to identify and control health and safety hazards. Procedures for reporting and resolving incidents shall be in place.

## **Environment**

Supplier shall conduct their operations in a way that ensures compliance with all applicable environmental laws and regulations. Supplier must ensure compliance with product-related requirements and may be required to declare the material content and origin of products delivered to Gorilla Glue. Supplier shall have environmental procedures in accordance with applicable elements in ISO14001 or equivalent standard.

## **Conflict Minerals and Chemical Substances**

Supplier must ensure compliance with product-related requirements, such as REACH, RoHS or Conflict Minerals, and may be required to declare the material content and origin of products delivered to Gorilla Glue.

## **Improper Payments**

Bribes, kickbacks, and similar payments are strictly prohibited. This ban applies even when local laws may permit such activity. Employees, suppliers, and agents acting on behalf of Gorilla Glue are strictly prohibited from offering or accepting such considerations under any circumstances.

## **Supply Chain Transparency**

Supply chain transparency is required to confirm compliance to these requirements. To monitor this, Gorilla Glue may request documentation, conduct onsite



audits, review and approve corrective action plans, and verify implementation of corrective action.

### **Compliance Monitoring**

Supplier will allow Gorilla Glue and/or any of its representatives or agents access to its facilities and all relevant records associated with the products and services provided to Gorilla Glue. Supplier and Gorilla Glue will establish a mutually agreeable date and time for access. However, risks to Gorilla Glue's business may require immediate access to the products, services and associated records, and Supplier will accommodate Gorilla Glue's access as required.

### **Harassment**

Supplier must treat all workers with respect and dignity. They may not subject workers to corporal punishment, physical, sexual, psychological, or verbal harassment or abuse. In addition, Supplier must provide an environment that allows employees to raise concerns without fear of retaliation. Where it is allowed by law, Supplier should have a system that allows employees to anonymously report their concerns.

### **Communication**

Supplier is expected to assist Gorilla Glue in enforcing these requirements by communicating its principles to their supervisors, employees, subcontractors and suppliers.



## APPENDIX 2 – Child Labor Policy



## **Labor Trafficking & Child Labor**

The purpose of this policy is to prohibit and prevent child labor and human trafficking in any form at The Gorilla Glue Company. This policy aims to safeguard the rights, dignity and well-being of children, ensuring safe and ethical work environment for all individuals.

### **Commitment to Ethical Standards:**

The Gorilla Glue Company is committed to the protection of children's rights as outlined in the United States national labor laws.

We will not engage in, or support any form of child labor or trafficking, either directly or indirectly.

### **Definition of Child Labor & Trafficking**

**Child Labor:** Refers to any work that deprives children of their childhood, interfered with their education, and is harmful to their physical or mental development. This includes, but is not limited to, work that is mentally, physically, socially, or morally dangerous or harmful.

**Human Trafficking:** Involves the recruitment, transportation, transfer, harboring, or receipt of individuals through force, fraud, or coercion for the purpose of exploitation, including forced labor or sexual exploitation.

### **Prohibited Practices**

The employment of individuals under the legal minimum working age defined by national law or under the age of 15 (whichever is stricter).

Any form of forced labor, including debt bondage, and child trafficking.

The use of recruitment practices that exploit children or place them in hazardous situations. Tolerating any work that interfered with a child's education, physical health, or psychological development.

### **Prevention & Protection Measures**

Establish reporting mechanisms through IntegraReport in order to confidentially report any suspected cases of child labor and trafficking. Reports will be investigated promptly and where necessary, corrective actions will be taken.

### **Corrective Actions**

Any identified incidents of child labor or trafficking will be immediately addressed through corrective action, removal of any child from the work environment and providing appropriate services.

### **Reporting**

The Gorilla Glue Company will work with relevant authorities to provide support and assistance.

