CODE OF CONDUCT
FREUDENBERG GROUP

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CONTENT

A Introduction

B Compliance: Definition and Sources for Support

1. Health, Safety & Environment (HSE), Fundamental Labor Principles
2. Working Together
3. Company Property and Proprietary Information
4. Software, E-mail, Social Media and the Internet
5. Managing Documents and Data Protection
6. Conflicts of Interest
7. Political Activities
8. Drugs and Alcohol, Weaponry
9. Public Statements
10. Antitrust and Competition
11. Anti-Corruption; Gifts and Entertainment
12. Foreign Trade Law: Export Controls

A. INTRODUCTION

The demands and challenges that the Freudenberg Group faces in its different regions, together with diverse and constantly changing conditions and regulations, make it important to clarify the standards of behavior for all associates.

The **Guiding Principles of the Freudenberg Group** together with the **Business Principles** express our firm commitment to comply with applicable laws and regulations, foster fairness and respect cultural differences, take on social responsibility and protect the environment and the well-being of our people. These principles express what is already deeply entrenched in the Freudenberg Group. They create the general conditions for a climate of trust and confidence, enhancing teamwork, innovation, customer focus and the long-term success of our company. This Code of Conduct is built upon the foundation of the Guiding Principles and the Business Principles.

At Freudenberg, we are proud of our strong commitment to the highest ethical standards in the conduct of our business around the world. Key to maintaining and keeping the trust of the public as well as of our customers, business partners and other stakeholders is the integrity and law abiding behavior of the Group's associates. Freudenberg believes that commercial achievements should not be the only measure of success but rather that success should be balanced with the fulfillment of our company values. All Freudenberg Group executives (who serve as role models within the Group) and associates must act with the highest integrity and ethics.

This Code of Conduct sets out what is expected in terms of business conduct and behavior from each associate, regardless of position. It is not the intention of this Code to interfere with the associates' private lives, but to clarify the expected standards of personal behavior in the context of business activities. Lawful and responsible conduct must be the "default" position for all company associates. This Code of Conduct aims to enable all associates to deal with ethical and legal issues appropriately and to help associates in areas which are sensitive. The Code of Conduct serves the purpose of providing an umbrella guideline for the expected standards within the Freudenberg Group. The Code is further complemented by additional company policies, procedures, guidance documents and manuals that are issued by the respective Business Groups, corporate functions or their regional extended arms (Freudenberg Regional Corporate Centers (FRCCs)). In some cases, those complementary rules may be stricter than the standards in this Code and, if so, you should follow those stricter rules. It is the responsibility of each superior to ensure appropriate communication within his/her area of

responsibility; likewise each associate shall use reasonable efforts to utilize all available resources to know which policies apply to him or her. Should any company policy appear to conflict with local law or if you are unsure of your responsibilities regarding a particular issue addressed in this Code of Conduct, please consult with your supervisor or manager, Human Resources, Corporate Legal or the respective Compliance or Ethics Office to clarify your position.

B. COMPLIANCE:

DEFINITION AND SOURCES FOR SUPPORT

It is the obligation of the Board of Management of Freudenberg SE and the respective Management Boards of the Business Groups to make all associates aware of the Code of Conduct and its contents. Management shall take all appropriate steps to ensure compliance within its respective area of responsibility and also monitor activities tailored in a manner to raise sensitivity and awareness for compliance issues.

As an individual, you are personally responsible for your own compliance with the Code of Conduct and with other applicable Corporate Principles. For purposes of this Code, the term **"Corporate Principles"** includes not only relevant laws applicable to our activities in particular jurisdictions, but also voluntarily accepted regional or international rules and guidelines as well as our Business Principles, Guiding Principles, this Code of Conduct and further non-contradictory supplementary policies, procedures, guidance documents and manuals issued by the respective Freudenberg Business Groups, corporate functions or FRCCs. Each associate must measure and evaluate his or her own conduct in light of the standards outlined in this Code and the Corporate Principles. Failure to comply with the Code of Conduct or with legal responsibilities, is unacceptable and may result in disciplinary action up to and including termination of employment.

Should any associate have questions relating to the Corporate Principles or this Code of Conduct or need advice or become aware of an imminent violation, there are many resources available to assist:

- In the first instance, the associate should speak to his or her immediate supervisor or manager.
- If suspicions involve the supervisor or manager or if, for whatever reason, the associate wishes to take the issue to someone else, then the associate should report the matter to
  - either another superior manager,
  - the respective Human Resources function and/or contact the competent workers representative body (e.g. in Germany Works Council),
  - the relevant Compliance office on Business Group level or the Corporate/Regional Ethics Office.

Freudenberg SE

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1. HEALTH, SAFETY & ENVIRONMENT (HSE)

FUNDAMENTAL LABOR PRINCIPLES

Freudenberg is fully committed to providing safe working conditions and conforming to regulations for occupational health and safety and environmental protection. The Freudenberg Group's "We all take care" and other initiatives are a central part of our commitment to providing and ensuring safe working conditions for all associates. All associates share responsibility for their own health and safety, that of their colleagues and of their business partners. It is therefore essential for each individual to comply with and observe all safety regulations in the workplace, thereby promoting safe working practices and minimizing health risks for all.

We assume responsibility for making our activities as environmentally compatible as possible. It is our duty to use carefully and protectively the natural resources we need for our processes, products and services. We dispose of residual substances that we can neither avoid nor recycle in a responsible manner. The protection of the environment is strongly positioned in Freudenberg's business practices. It is our target to continuously reduce the consumption of resources through optimized business processes.

In accordance with our Business and Guiding Principles, Freudenberg complies with the internationally recognized Human Rights and fundamental freedoms in accordance with the principles of the UN Global Compact. We will not manufacture and distribute products intended for harming people (for example weapons).

We reject child labor and any form of forced labor.

We respect trade unions and their principal right to form associations. We also respect, where applicable, workers' council organizations, democratically elected by associates and strive for constructive cooperation with workers' representatives.

2. WORKING TOGETHER

The Freudenberg Group encourages open communication and team work. Each associate must treat colleagues with respect.

Equal opportunity/anti-discrimination

The associates of the Freudenberg Group reflect the diversity of society, languages, cultures and lifestyles. We promote a multi-cultural environment where employees and associates work together in cross-border and cross-Business Group teams to enrich our culture and capability, and we promote diversity as it is a prerequisite for respect and our openness to new ideas. We do not tolerate any discriminatory comments or conduct against individuals in particular relating to their race, religion, sexual orientation, nationality, ancestry, trade union activities or pertaining to their age, gender or any disability. Discrimination and exploitation of the weak and helpless have no place in our company.

Violence and harassment in the workplace

Violence in the workplace will not be tolerated. Violence includes direct or indirect threats, threatening behavior, intimidation, physical attack, harassment and all forms of stalking.

3. COMPANY PROPERTY AND PROPRIETARY INFORMATION

All assets of Freudenberg must be safeguarded. Such assets include but are not limited to physical assets, proprietary information, know-how (e. g. recipes), patents, trademarks, copyrights, brands, company names, product denominations or logos. All associates have a duty to use company assets only for legitimate business purposes and to protect them from loss or unauthorized use. The unlawful or improper use, misappropriation or abuse of any Freudenberg asset is prohibited in all circumstances.

Intangible assets, as for example unpublished business related information, or business secrets, must be treated as confidential. Those associates who hold such information must not make it available or accessible to unauthorized persons either from inside or outside the company.

While it is appropriate to gather publicly available information about other companies, the use of illegal, unethical or otherwise questionable methods to obtain information about other companies is not permitted. Freudenberg frequently enters into relationships with other companies in which those companies release confidential or proprietary information to us. You should avoid accepting such information until a valid confidentiality agreement is in place. Should an associate of Freudenberg come into contact with information about other companies that appears to be proprietary or confidential in nature, he or she should consult with management or Corporate Legal or the respective Compliance or Ethics Office to see what restrictions, if any, may apply to the use of the information.

4. SOFTWARE, E-MAIL, SOCIAL MEDIA AND THE INTERNET

Information Technology (IT) systems, including hardware, software and the information they process and store are critical to Freudenberg operations. They are company property, and as such may be used in principle for Freudenberg business purposes only. Those with access to Freudenberg IT systems, including those with temporary access, must use the system appropriately and at the same time adhere to our existing Freudenberg and Business Group IT security policies.

The increased and widespread usage of social media, to the extent permitted, must not interfere with our principal policy to secure proprietary information and safeguard the reputation of our company.

When using the company e-mail account each associate is required to respect the integrity of colleagues and third party business partners. Diligence and care need to be exercised in order not to contribute to or cause any material adverse effect for the company.

5. MANAGING DOCUMENTS AND DATA PROTECTION

Financial statements and books, records, and accounts of any legal entity of the Freudenberg Group form part of company records, and are therefore company property. They must be accurate and must also comply with all legal and tax requirements, as well as with internal Freudenberg accounting principles. All company records are important corporate assets. The responsibilities for the creation, use, maintenance, secure storage, and where appropriate, the safe disposal of records lies with all associates. Such actions should only be carried out in accordance with company policy, standards, and procedures, and current legal requirements.

As an employer, Freudenberg may hold sensitive or confidential information of or relating to its associates or other individuals such as personal identification data (e.g., passport or driver's license numbers), employment or education records, health or medical information, and banking or financial account information. These and other such data are deemed to be personal. Freudenberg and its employees should respect and protect this information, just as diligently as confidential company information. Laws dealing with the protection of personal data vary from country to country. The Freudenberg Group adheres to such laws as are in force in the respective region or country where business activities are performed.

6. CONFLICTS OF INTEREST

We demand highest ethical standards from all of our associates. When dealing with existing or future suppliers, customers, clients or competitors, our associates must act in the best interest of the company to the exclusion of any personal advantage; private interests and the interests of the Freudenberg Group should be kept strictly separate. Consequently, anything that may constitute or lead to, or even create the appearance of, a conflict of interest between associates and the company must be avoided. The following situations, for example, may result in a conflict of interest:

- Business opportunities that belong to Freudenberg being misused or diverted for personal gain or advantage.
- Relations with current or potential trading partners, or competitors, which may influence or appear to influence the carrying out of your responsibilities.
- Marketing products or services similar to or competing with those of Freudenberg.
- Abusing one's position or misappropriating company property for personal benefit.
- Entering into arrangements on the company's behalf with relatives or a company in which the associate or a relative has an ownership or financial interest.
- Using your time while employed by Freudenberg to conduct or prepare business which may later compete with Freudenberg.
- Using confidential or proprietary information of the Freudenberg Group or its trading partners for your own benefit or in a way detrimental to Freudenberg. For example, information which may affect the value of a stock listed company must not be used in order to engage in private stock trading (insider trading activities).

If you are in doubt whether your activities may result in a conflict of interest, bring any potential conflict situation immediately to the attention of your manager (or one of the other resources listed in the Introduction) so that appropriate guidance can be rendered.

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7. POLITICAL ACTIVITIES

The Freudenberg Group does not get involved in political activities or campaigning for political parties, candidates or public officials. In accordance with this principle we do not give financial support or make donations to political parties or organizations, candidates or public officials, or their representatives.

This desire on behalf of Freudenberg to remain politically impartial, does not infringe the rights of associates who may wish to take part in the political process or become involved in community service, charitable, or other similar non-profit activities. However, any such involvement should be conducted in a legally permissible manner as private citizens, and must not use company time or resources.

8. DRUGS AND ALCOHOL, WEAPONRY

The use, sale, distribution or possession of weapons or illegal drugs on company premises or during company times is strictly prohibited and will be the subject of disciplinary action. The consumption of alcohol on company premises is prohibited unless used in defined hospitality areas and in connection with a company-authorized event. Reporting to work or working while under the influence of alcohol or illegal drugs (including illegally obtained or improperly used prescription drugs) will not be tolerated. For all business activities taking place off site, the applicable laws must be strictly followed.

9. PUBLIC STATEMENTS

Only those authorized to do so may make public statements or publish information concerning Freudenberg. Inquiries by the media or by other persons from outside the company must always be referred to the company's management or to those authorized to respond. The same principles apply to publications concerning Freudenberg and its business activities if other media (e.g., social networks and similar means of communication) are used.

10. ANTITRUST AND COMPETITION

Freudenberg requests that all managers and associates fully comply with all antitrust and other trade laws which generally prevent the unreasonable restraint and functioning of a free and competitive marketplace. Freudenberg also adheres to all legislation that outlaws unfair or deceptive trade practices. Freudenberg does not enter into any coordinated or informal arrangements to boycott customers or other business partners and we have a policy of zero tolerance towards price-fixing, bid rigging, or allocation of customers and markets among competitors.

Freudenberg associates may not discuss or exchange any information with competitors regarding:

- Product prices, price changes, price differentials, margins, costs, markups, discounts, allowances, etc.
- Industry pricing policies or practices, price levels, price changes, price differentials, etc.
- Plans concerning the pricing and marketing of products
- Any bids or Requests for Proposals (RFPs) to which the parties are responding, including pricing or product mix relating to such bids or RFPs
- Information about production capacity and intended adjustments
- New products in development and other confidential strategies
- Allocation of any territories, customers or markets
- Customer specific or transaction specific confidential information

Please clarify any doubts about appropriate contact and communication with competitors immediately by discussing your concerns with your local senior management or Corporate Legal. Should a situation or conversation arise in which you have any doubt of its appropriateness in this context, you should remove yourself from the situation immediately and report the matter to your supervisor and/or consult the Compliance Office or Ethics Office or Corporate Legal.

11. ANTI-CORRUPTION; GIFTS AND ENTERTAINMENT

Freudenberg is honest and transparent in dealings with others, obeying all applicable laws and corresponding regulations. The use of fraud, bribery, kickbacks or other corrupt practices in conducting Freudenberg business is strictly prohibited.

No associate or anyone else acting on behalf of the company, directly or indirectly, may offer any payment or gift to, or improperly influence, any government official or officials working for international institutions. Freudenberg associates may not provide or authorize any funds to any intermediary when any of those funds may be used for corrupt payments to government officials or similar officials of institutions.

Invitations to meals as recipient or as an offer to others in a business relationship may, depending on applicable laws and customs, be considered legal and usual in the course of business. However, the exchange of excessive or inappropriate gifts and entertainment is unethical, may be illegal, and may severely injure your personal business reputation and that of Freudenberg. Freudenberg provides the following guidelines to allow employees to exchange inexpensive gifts or entertainment with commercial customers, suppliers, both actual and potential:

- A gift must be of nominal value (check amount with Regional Compliance or Ethics Office), e.g., annual present of Freudenberg wine or calendar is principally acceptable.
- A gift cannot consist of money or its equivalents (e.g. voucher).
- The gift, meal or entertainment is part of a legitimate business relationship or celebration.
- The gift, meal or entertainment does not influence, or could not reasonably be construed as influencing, either party in the fulfilment of their responsibilities.
- The exchange of the gift, meal or entertainment does not break any law or violate any generally accepted ethical standard.
- The exchange of the gift, meal or entertainment should be no cause of concern or embarrassment to the company.

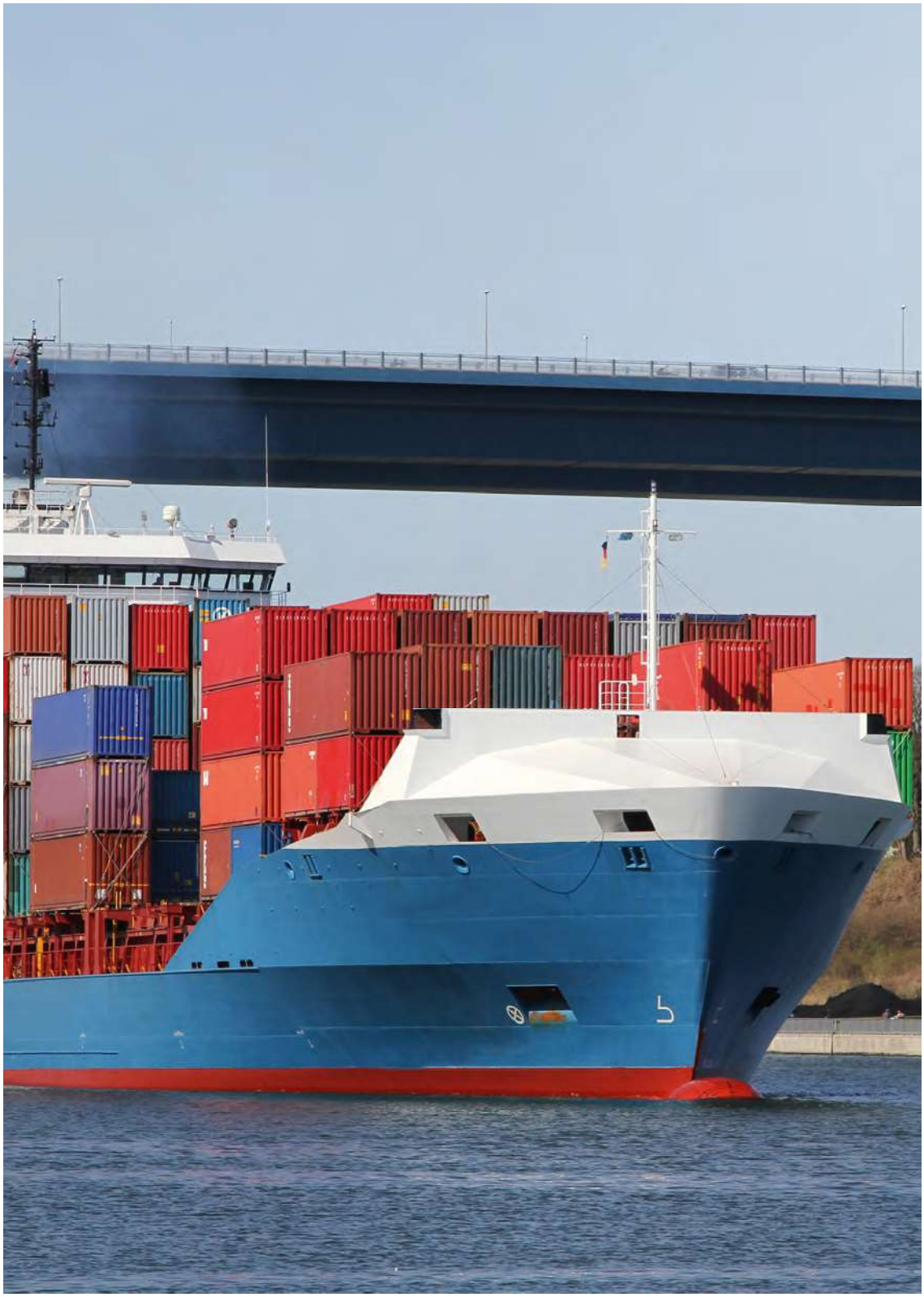
If in any doubt, consult your supervisor, the Ethics or Compliance Office or Corporate Legal. The restrictions outlined above apply equally to gifts, meals or

entertainment offered to you or your family and friends by customers, suppliers or competitors.

Freudenberg policy applies, irrespective of what may be considered ethical or appropriate behavior by other companies. You may feel, however, that you require an exception to be made for cultural reasons in another country. Should this be the case, please submit a written request to your manager or superior or to the respective Ethics or Compliance Office.

12. FOREIGN TRADE LAW: EXPORT CONTROLS

The imposition of trade restrictions (e.g. dual use goods, US-(re-)export controls and local country laws) and embargoes against countries, regimes, entities and individuals are common factors of foreign trade law. Restrictions and embargoes refer to sale, import, export, electronic transfer, provision or disclosure of information, software, commodities, technology, services and financial transactions, including brokerage. Violation of such laws can result in serious penalties, including imprisonment and fines, loss of export privileges and future business, as well as loss of reputation. The scope of restrictions and embargoes in force changes frequently and must be constantly monitored. Associates involved in import and export (e.g. Purchasing, Sales, R&D, Supply Chain, etc.), must keep up-to-date of the rules that are in force and need to adhere to related procedures to be in compliance. Associates should address any questions to either the responsible person within their Business Group or to the corporate function Corporate Tax and Customs of Freudenberg & Co. Kommanditgesellschaft, including the Freudenberg Regional Corporate Center.



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