

Code of Conduct for Suppliers

(February 2026)

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The Freudenberg Group is a global company. Legal compliance, integrity, and sustainability are deeply rooted in Freudenberg's corporate culture. The Freudenberg Group's **guiding principles and business principles** and our Code of Conduct reinforce our ongoing commitment to complying with laws, promoting justice, respecting cultural differences, assuming social responsibility, and protecting the environment and the well-being of the people who work with us and along our supply chain. As a signatory to the United Nations Global Compact, Freudenberg is committed to complying with the ten principles in the areas of human rights, labor, the environment, and anti-corruption. These principles create the framework for a climate of trust and confidence, which promotes teamwork, innovation, customer focus, and the long-term success of our company.

The introduction of corresponding supply chain laws and guidelines in Europe and North America in particular has also created minimum legal standards.

Freudenberg FST GmbH and all its affiliated companies in the Freudenberg Sealing Technologies subgroup worldwide (hereinafter collectively referred to as "**FST**") expect all suppliers to act with the same integrity, fairness, responsibility, honesty, and commitment to sustainability.

The principles set out in this Code of Conduct for Suppliers of FST ("**Code of Conduct**") form an important part of the supplier selection and evaluation process at FST. The Code of Conduct is valid worldwide and applies to both manufacturing suppliers and service providers of all kinds, including consultants, intermediaries, and other business partners ("**Suppliers**").

FST expects its Suppliers to comply with all of the principles and requirements described below and to address them appropriately with their subcontractors and subcontractors:

Compliance with laws, rules, and standards

FST's Suppliers comply with all applicable laws, rules, and regulations in the countries in which they operate and take into account internationally recognized environmental, social, and corporate governance standards (ESG standards) with the aim of continuously improving their sustainability performance.

Corruption, bribery, embezzlement, and fraud

FST rejects any form of corruption, bribery, embezzlement, theft, or extortion and expects the same from its Suppliers. Suppliers must comply with applicable anti-corruption laws, including those relating to bribery abroad. These include, in particular, the UK Bribery Act 2010 and the U.S. Foreign Corrupt Practices Act. In particular, Suppliers shall not offer, grant, or accept bribes, kickbacks, or other illegal payments, incentives, gifts, entertainment, favors, or other benefits or gratuities of value for the realization of business opportunities or in any connection with FST's business activities.

Conflicts of interest

FST's Suppliers make business decisions based solely on objective criteria and are not allowed to be influenced by personal interests or relationships. They immediately disclose any actual or potential conflict of interest in connection with their work for FST.

Fair and free competition

FST's Suppliers respect fair and free competition and comply with the laws that protect and promote it, in particular the applicable antitrust laws. They do not enter into any anti-competitive agreements with competitors, suppliers, or customers, do not exchange any competition-related information, and do not abuse any potentially dominant market position.

Money laundering and terrorist financing / financial records

FST's Suppliers ensure compliance with applicable anti-money laundering and anti-terrorist financing regulations. They maintain financial records and prepare reports in accordance with applicable laws.

Export control and tariffs

FST's Suppliers shall ensure compliance with all applicable regulations governing the import and export of goods, services, and information. In particular, they shall fulfill the obligations of customs and foreign trade laws in all countries in which they conduct business. The Supplier must ensure that it complies with all applicable national and supranational sanctions and trade embargoes and checks sanctions lists. To this end, the partner must take all necessary measures to avoid the risk of a sanctions violation.

Data protection

FST's Suppliers comply with applicable laws on the protection of personal data of employees, customers, business partners, and other affected parties.

Security and protection of information, trade secrets, and intellectual property

FST's Suppliers shall protect the know-how, patents, intellectual property, and confidential information, in particular trade and business secrets, of FST and third parties in an appropriate manner and shall store such information securely. If necessary, Suppliers shall implement a reliable information security management system in accordance with ISO27001 or TISAX and ensure that the relevant information is protected in all business processes. The aim is to prevent data protection violations and attacks on IT systems. Suppliers are obliged to treat all non-public technical and commercial information that becomes known to them in the course of their business relationship with FST as confidential. They shall not publish confidential information without authorization, nor shall they pass it on to third parties without authorization or make it available in any other form.

Human rights / fair and safe working conditions

For FST, respect for internationally recognized human rights, in particular the guidelines on children's rights and corporate action, the United Nations guidelines on business and human rights, and the labor standards of the International Labor Organization (ILO), forms the basis of all business relationships. FST's Suppliers undertake to respect the resulting rights of their employees and to treat them in accordance with these guidelines.

Prohibition of child labor

Child labor is prohibited. The minimum age for admission to employment in accordance with the applicable legal regulations must be observed. If no legal regulations exist, ILO Convention 138 applies accordingly. According to this convention, the direct or indirect employment of children under the age of 15 is generally prohibited. Employees under the age of 18 shall only perform work in accordance with the legal requirements of their country of employment (in particular with regard to working hours and conditions) and in compliance with the requirements regarding education and training. Their health and safety must never be compromised.

Prohibition of slavery and forced labor

FST does not tolerate slavery, servitude, forced labor—in any form—or human trafficking in the supply chain. Suppliers are therefore not permitted to use forced labor or slave labor. Any comparable form of labor is also prohibited, such as debt bondage, contract bondage, and involuntary prison labor. Work must always be performed voluntarily. FST expects suppliers not to retain any personal property, passports, wages, training certificates, work permits, or other documents belonging to

their employees without good reason and a legal basis.

Freedom of association

In accordance with local laws, Suppliers must respect the right of their employees to freely decide, without discrimination, threats, intimidation, or other retaliatory measures, to join or form a union/employee representative body of their choice, or not to do so. Suppliers must recognize and respect the free operation of trade unions in accordance with the law of the place of employment, in particular the right to strike and the right to collective bargaining.

Equal opportunities and prohibition of discrimination

FST expects Suppliers not to discriminate or treat people unfairly in their own business, especially because of their national or ethnic background, social background, ethical and cultural affiliation, religion or belief, political opinion, sexual identity, union activities, or as a result of age, health status, gender, or any physical, mental, or psychological impairments.

Occupational safety and health protection

FST's Suppliers guarantee occupational health and safety at work at least within the scope of the applicable laws. FST requires its Suppliers to take appropriate measures to prevent accidents at work, health hazards, and work-related illnesses among employees. FST also recommends that its Suppliers introduce an occupational health and safety management system in accordance with ISO 45001 to ensure systematic improvement in occupational safety and health protection.

Violence and harassment in the workplace

FST does not tolerate violence in the workplace, either within its own business or in its supply chain. This includes direct or indirect threats, threatening behavior, intimidation, physical assault, and any form of harassment.

Faire pay and working hours

FST's Suppliers ensure that their employees receive appropriate remuneration that at least meets the statutory minimum wage requirements of the place of employment. If no such regulations exist, remuneration is based on industry-specific, locally customary remuneration and benefits. Working hours shall in no case exceed the upper limits specified in the applicable laws and shall be based on industry standards for the respective national economic sectors.

Use of public and private security forces

When security personnel are deployed by FST Suppliers to protect facilities, internationally recognized human rights must be observed.

Protection of local communities and indigenous peoples

FST expects its Suppliers to respect the rights of local communities and indigenous peoples who may be affected by the Suppliers' business activities and to take into account the local impact of their business activities. In particular, harmful effects on the health, safety, and livelihoods of those affected must be avoided.

Ecological responsibility, environment, and animal welfare

FST assumes responsibility for making its business activities as environmentally friendly as possible and expects the same from its Suppliers. FST's Suppliers ensure compliance with the national and international environmental laws, regulations, and standards applicable to them and apply the principle of sustainability to conserve resources and minimize environmental impact in their production processes and products and/or services. In particular, they ensure compliance with the legal requirements for waste disposal and the storage and handling of hazardous substances.

FST Suppliers must be able to assess and document their environmental performance in order to derive and implement measures for continuous improvement (e.g., via an environmental management system in accordance with ISO 14001). These measures include reducing greenhouse gases and other emissions, increasing energy efficiency, using renewable energies, increasing the use of sustainable raw materials and recycled materials, reducing water consumption, and reducing waste. Suppliers must provide these key figures to FST upon request for life cycle assessments.

Suppliers' business activities must not contribute to the conversion of natural ecosystems or illegal deforestation. Products that FST purchases from its Suppliers must be produced without deforestation as defined by the EU Deforestation Regulation and in accordance with the laws of the country of origin. Suppliers must implement due diligence processes to ensure the traceability of their products and prevent illegal or environmentally harmful practices in production. FST expects active cooperation to support efforts to combat deforestation and protect biodiversity.

FST Suppliers check the environmental compatibility of discharges and soil contamination to prevent contamination of surface water or groundwater and to maintain soil quality.

FST Suppliers shall ensure compliance with bans and restrictions on the manufacture, placing on the market, and use of persistent organic pollutants, as regulated by the EU POP Regulation 2019/1021.

FST Suppliers who process animal products will implement standards for animal welfare compliance. Applicable laws and regulations on animal welfare must be observed in all cases.

The Supplier must avoid or continuously minimize the generation of air emissions, noise emissions, and greenhouse gas emissions from the business as far as possible. The Supplier undertakes to respect international, national, local, and traditional rights, in particular the rights of indigenous communities, to land, forests, and water.

The Supplier undertakes to comply with the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests, and water if the Supplier acquires, develops, or otherwise uses land, forests, or water whose use secures a person's livelihood.

Product compliance and safety

For FST, compliance with the legal and regulatory requirements and internal standards applicable to FST products is not only a legal obligation but also its own standard. This requires FST's Suppliers to develop, manufacture, and deliver products that meet the latest recognized state-of-the-art requirements for product integrity, conformity, and safety. FST's Suppliers comply with the product safety, regulatory, and technical regulations and requirements applicable in the country of manufacture and at the place of contract fulfillment, in particular the applicable laws concerning the safety, labeling, and packaging of products, as well as the use of hazardous substances and minerals.

Due diligence obligations regarding supply chains and minerals from conflict and high-risk areas

FST expects its Suppliers—as well as FST itself—to implement appropriate and effective risk management to identify and minimize human rights and environmental risks in their supply chains and to prevent, end, or minimize the extent of violations of human rights or environmental obligations. This includes the implementation of appropriate complaint mechanisms and reporting based on applicable laws and guidelines.

As part of its general due diligence obligations along the supply chain, FST expects its Suppliers, if they supply products containing conflict minerals, to be aware of the applicable legal requirements relating to minerals from conflict-affected and high-risk areas, such as the Dodd-Frank Act, ensure compliance with these laws, follow the recommendations of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and avoid any minerals originating from conflict smelters in the context of their business relationship with FST. FST Suppliers should also make every effort to ensure that there is no direct or indirect financing of armed groups. Upon request, Suppliers shall provide FST with information on the smelters or refiners used by them or their subcontractors for minerals such as tin, tantalum, tungsten, gold (3TG), and cobalt.

Supplier compliance with the Code of Conduct

Supplier obligations

FST's suppliers confirm that they have or are implementing appropriate and effective processes and organizational structures to ensure compliance with the provisions of this Code of Conduct. They ensure that their employees are familiar with and comply with the principles of conduct set out therein and support them in acting lawfully and with integrity. Compliance with the requirements of this Code of Conduct shall be a decisive factor in the selection of a subcontractor or sub-contractor. This applies in particular to FST's human rights and environmental expectations as expressed in this Code of Conduct.

Control mechanisms

Suppliers support FST in implementing legally required and other due diligence processes by actively participating in related initiatives, e.g., self-assessment questionnaires.

FST reserves the right to verify compliance with the laws and requirements set out in this Code of Conduct, either itself or through external experts, in individual cases, after giving prior notice to suppliers and in the presence of representatives of the Supplier, in accordance with the applicable local legal provisions.

Training and continuing education

Suppliers shall design and implement appropriate training programs to provide their managers and employees with an adequate level of knowledge and understanding of the applicable principles of this Code of Conduct, applicable laws and regulations, and generally accepted standards.

Remedies for violations

FST considers compliance with the principles contained in this Code of Conduct to be essential for the respective contractual relationship.

If Suppliers violate the principles contained in this Code of Conduct, FST is entitled to demand the disclosure of all relevant information. In addition, without prejudice to any other contractual remedies, FST may terminate the business relationship with the respective Supplier in whole or in part by extraordinary termination if the Supplier does not immediately develop and implement a plan to end or minimize the violation and to prevent future violations. During the implementation of the plan, FST is free to temporarily suspend the business relationship.

If Suppliers become aware of violations of the principles contained in this Code of Conduct by one of their upstream suppliers, the Suppliers shall endeavor to bring the latter's conduct into line with the obligations under this Code of Conduct.

Complaint mechanism



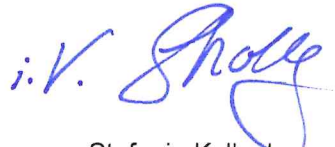
FST encourages anyone who becomes aware of violations of this Code of Conduct to report them to the Freudenberg Ethics Offices. The Ethics Offices can be contacted via the Speak up tool (electronic reporting system), the so-called “Whistleblower Solution” (<https://freudenberg.integrityline.app/>), or by mail.



Whistleblowers can also report human rights and environmental risks as well as violations of human rights or environmental obligations under the German Supply Chain Due Diligence Act to the Ethics Offices if these have arisen as a result of FST's economic activities in its own business area or at or by a direct or indirect supplier of FST.

Tips and reports can also be made verbally via audio file or voice recording (Automated Message Service, at local landline rates); the voice is distorted for confidentiality purposes. It is also possible to upload files (except .exe format).

Further information is available at www.freudenberg.com.

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