

# Confidentiality commitment, Sustainability, Code of Ethics and Legislative Decree no. 231 of 8 June 2001

Revision of 01 Feb. 2016

## I - Foreword

The Supplier, by accepting this document, undertakes to comply with confidentiality as detailed below, share and apply the regulations concerning respect for the environment and safety, operate in accordance with the spirit and intent of the code of ethics adopted the Buyer, and declares to have been informed of the adoption, by the Buyer, of the rules of conduct relating to the provisions of Legislative Decree 231/2001.

## I – Confidentiality commitment

### 1. Confidentiality commitment

By signing this document, the Supplier, in the person of its legal representative, with the necessary powers, irrevocably takes for him/herself, for the company he/she represents and for any subsidiaries, the following obligations:

- a. The technical data, specific production processes, drawings, specifications, technical descriptions and information in general that are directly or indirectly transmitted by Freudenberg Sealing Technologies S.a.s. di Externa Italia S.r.l.u. with sole shareholder or by its subsidiaries, are elements to be considered covered by industrial secrecy and, therefore, the Supplier undertakes not to disclose them to third parties or to use them for commercial purposes
- b. The Supplier undertakes to use the elements referred to in point a) exclusively for execution of works intended for Freudenberg Sealing Technologies S.a.s. di Externa Italia S.r.l.u. with sole shareholder
- c. The Supplier undertakes to disclose the elements of this document to its employees or to any of its suppliers with all the precautions, including those of a legal nature, necessary to ensure the confidentiality commitment taken, even after any cessation of production or employment.

Fulfilment of this point does not exempt the Supplier from the liability relating to points a) and b).

Should this commitment be breached, Freudenberg Sealing Technologies S.a.s. di Externa Italia S.r.l.u. with sole shareholder shall have the right to terminate all agreements in place and to claim compensation for damages.

## II - Sustainability and Code of Ethics

### 2. Sustainability

The Supplier undertakes to comply with, and to promote among its suppliers, the principles of conduct with regard to sustainability.

These principles are detailed in the Corporate Compliance Policy of the Freudenberg Group, which can be downloaded from the website [www.fst.com](http://www.fst.com) in the section Company / Freudenberg Suppliers / FST - Italy / Corporate Compliance.

### 3. Respect for the environment and safety

The Supplier undertakes to comply with and to ensure compliance by its suppliers with all current legislation relating to environmental protection and accident prevention.

This responsibility includes products, production processes, packaging systems and materials, all handling systems (cranes, forklifts, etc.) and transport vehicles used,

# Confidentiality commitment, Sustainability, Code of Ethics and Legislative Decree no. 231 of 8 June 2001

Revision of 01 Feb. 2016

failure to comply with legislation shall allow the Buyer to immediately suspend all agreements in place, as well as claim for all the direct and indirect damages resulting from missing supplies, including any additional costs incurred for procurement from other sources.

## 4. Code of Ethics

The Supplier declares to have read the Guiding Principles and Code of Conduct and Behaviour adopted by the Buyer and published on the website <http://new.freudenberg.it/it/responsibility> in the Responsibility section and undertakes to comply with the principles contained therein

Failure to comply with this commitment shall entitle Freudenberg Sealing Technologies S.a.s. di Externa Italia S.r.l.u. with sole shareholder to terminate all agreements in place and to claim compensation for damages.

## III - Legislative Decree no. 231 of 8 June 2001

### 5. General principles of conduct and control

The Supplier declares to be aware of the contents of Legislative Decree no. 231 of 8 June 2001 and to undertake to refrain from conduct likely to give rise to the crimes referred to in said decree, regardless of actually committing the crime or the criminal liability of the same.

Failure to comply with this commitment shall entitle Freudenberg Sealing Technologies S.a.s. di Externa Italia S.r.l.u. with sole shareholder to terminate all agreements in place and to claim compensation for damages.

- The Supplier declares to have adopted an Organisation, Management and Control Model pursuant to Legislative Decree 231/2001
- The Supplier declares NOT to have adopted an Organisation, Management and Control Model pursuant to Legislative Decree 231/2001

We hereby confirm to have received, understood and accepted the document "Confidentiality, Sustainability and Ethics Commitment, Legislative Decree 231 of 8 June 2001", in the edition and revision indicated at the bottom of this document and that the declarations made correspond to the truth

For the Company ..... The Legal Representative ..... Date .....

Pursuant to and for the purposes of Arts. 1341 and 1342 of the Italian Civil Code, the following clauses are specifically approved:

- 1) Confidentiality commitment; 3) Respect for the environmental and safety; 4) Ethics; 5) General principles of conduct and control;

For the Company ..... The Legal Representative ..... Date .....

**FREUDENBERG  
SEALING TECHNOLOGIES**  
Freudenberg Sealing Technologies s.a.s di Externa Italia s.r.l.u.  
Sede Legale / Amm.va :Z.I. Porporata, Via Ferrua 4  
10064 Pinerolo (TO) Italia  
Cap. Soc. € 3.096.000 int. vers.  
Registro delle imprese di Torino n. 03731800011

General Partner:  
Externa Italia s.r.l. a socio unico  
Via Ferrua 4, 10064 Pinerolo (TO) Italia

Dati Bancari: