

Confidentiality agreement, GDPR Policy, Sustainability, Code of Conduct, and Legislative Decree no. 231 of 08/06/01

Revised 26th January 2021

I - Recitals

The Supplier, by accepting this document, undertakes to respect confidentiality, as detailed below, of sharing and applying the standards regarding respect for the environment and safety, of operating in accordance with the spirit and intent of the code of ethics adopted by the Buyer, and declares that it has been informed of the Buyer's adoption of behavioural standards relating to the requirements of Legislative Decree 231/2001.

I - Confidentiality Agreement

1. Confidentiality Agreement

By signing this document, the Supplier, in the person of its legal representative, invested with the necessary powers, irrevocably assumes for itself, for the company that it represents, and for any subsidiary companies, the following obligations:

- a. The technical data, the specific production processes, the designs, the specifications, the technical descriptions, and the information in general that are communicated, directly or indirectly, by Freudenberg Sealing Technologies S.a.s. of Externa Italia S.r.l.u., or by its subsidiary companies, are elements that should be considered as covered by industrial secrecy; therefore, the Supplier undertakes not to disseminate them to third parties, nor to use them commercially
- b. The Supplier undertakes to use the elements referred to in point a) exclusively for the execution of work for Freudenberg Sealing Technologies S.a.s. of Externa Italia S.r.l.u.
- c. The Supplier undertakes to inform its employees, or any of its suppliers, of the elements in this document, adopting all the necessary measures, including legal ones, to guarantee the confidentiality commitment assumed, even after any cessation in production or in the working relationship.

Compliance with this point does not release the Supplier from the related responsibilities in points a) and b).

If this commitment is disregarded, Freudenberg Sealing Technologies S.a.s. of Externa Italia S.r.l.u. has the right to exercise the termination of all existing agreements and the right to make claims for further damages.

II - GDPR Policy

2. Policy pursuant to art. 13 of the Regulation (EU) 2016/697 of the European Parliament and of the Council of 27 April 2016 (hereinafter, also "GDPR" or General Data Protection Regulation) relating to the processing of personal data

This Company informs you that as of 25 May 2018, the Regulation (EU) 2016/697, which establishes the standards relating to the protection of natural persons with respect to the processing of personal data, has been implemented. The GDPR proposes, in particular, to protect the fundamental rights and freedoms of natural persons, with reference to the protection of personal data.

This Policy is, therefore, issued pursuant to art. 13 of the GDPR.

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From the time of the establishment and for the duration of the contractual relationship with our Company, this Company will process your personal data.

The processing will take place in order to establish and fulfil the contractual relationship that links you to our Company, as well as for effectively managing the commercial relationships, besides the performance of any precontractual steps that may be adopted on your request (art. 6, point b) of the GDPR).

The processing of your data will, in addition, be carried out as far as it is necessary to fulfil legal obligations relating and connected to this relationship to which the Data Controller is subject (art 6., point c) of the GDPR).

The processing takes place with or without the aid of electronic or, in any case, automated, digital, and telematic tools, with procedures strictly related to the purposes identified above and, in any case, in a manner that ensures the security and confidentiality of such data.

The conferral of your personal data is mandatory for the purposes of the establishment, management, and execution of the contractual relationship with our Company and to fulfil the related legal and contractual obligations. Therefore, any refusal to provide them, in whole or in part, may mean it is impossible for this Company to implement the same contractual relationship, besides the performance of the related obligations set forth in the Law.

The Data Controller is:

Freudenberg Sealing Technologies S.a.s. of Externa Italia S.r.l.u.
with registered office on Via Ferrua, 4, Pinerolo (TO), Italy; e-mail:
FSTAFC@legalmail.it
Ph. 0121-392222

The name of the Person in charge of data protection will be communicated separately via a specific email

Within Freudenberg Sealing Technologies s.a.s. of Externa Italia s.r.l. with sole shareholder the Person in charge of data protection, the staff of the accounting, administration, logistics, dispatch, management, quality, and data processing centre offices of our Company, appointed as authorised parties, as well as the Persons in charge of Data Processing who may be appointed, may become aware of your personal data.

In addition, without prejudice to the communications made in performance of legal obligations, your personal data will be communicated to:

credit institutes and finance companies;

third parties for the purposes of managing services carried out on behalf of our Company as external consultants, such as accountants, budget review companies, software houses, and service consultants;

parent companies, subsidiary companies, and partners and other parties that are part of the Freudenberg Group, the complete, updated list of which can be found at our Administration Office;

transport companies and, in general, other companies that operate in the name of and behalf of Freudenberg Sealing Technologies s.a.s. of Externa Italia s.r.l. with sole shareholder.

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Your personal data will not, in contrast, be disseminated.

Your personal data will be processed for the whole duration of the contractual relationship established with our Company and, subsequently, will be stored for the period strictly necessary to fulfil the obligations set forth in the sector's regulations (civil and tax law, etc.) relating to the contractual relationship concerned.

As a data subject, you are the proprietor of the rights set forth in arts. 15, 16, 17, 18, 20, and 21 of the GDPR, where applicable.

In particular, you shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access the personal data and a copy of the personal data subject to processing (so-called "Right of access", art. 15 of the GDPR); to obtain from the Data Controller the rectification of inaccurate personal data concerning you, without undue delay. Taking into account the processing purposes, you shall have the right to have incomplete personal data supplemented, including by means of providing a supplementary statement (so-called "Right to rectification", art. 16 of the GDPR); to obtain from the Data Controller the erasure of personal data concerning yourself, without undue delay, if one of the grounds set forth in art. 17 of the GDPR subsists (so-called "Right to erasure", art. 17 of the GDPR); to obtain from the Data Controller the restriction of the processing where one of the cases set forth in art. 18 of the GDPR applies (so-called "Right to restriction of processing", art. 18 of the GDPR); to receive the personal data concerning you, which you have provided to the Data Controller, in a structured, commonly used, and machine-readable format and to transmit those data to another Data Controller without hindrance, by the Data Controller to which they were provided (so-called "Right to data portability", art. 20 of the GDPR); to object at any time, on grounds connected to your particular situation, to processing personal data concerning you pursuant to art. 6, para. 1, point e) or f) of the GDPR.

These rights may be exercised upon a request to the Data Controller, by means of the postal service, telefax, and email, using the contact details included above.

In addition, if you believe that the processing concerning you breaches the GDPR, you shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, or the place where the alleged infringement took place, without prejudice to any other administrative or legal appeal (so-called "Right to lodge a complaint with a supervisory authority", art. 77 of the GDPR and art. 140 bis of Legislative Decree 101/2018)

In Italy, the responsible supervisory authority is the Italian Data Protection Authority (hereinafter the "Authority"), established by Law no. 675 of 31 December 1996 (www.garanteprivacy.it).

The data subject declares that it has received the complete policy pursuant to art. 13 of the Regulation (EU) 2016/697 of the European Parliament and Council of 27 April 2016.

Signing this document confirms that you have acknowledged what is set forth above

III - Sustainability and Code of Conduct

3. Sustainability

The Supplier undertakes to comply with and to promote, with its suppliers, the behavioural principles relating to sustainability.

These principles are described in the Corporate Compliance Policy of the Freudenberg Group and can be downloaded from the website: www.fst.com in the Company / Suppliers / FST Italy / Corporate Compliance Policy section

**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. 03731800011C.C.I.A.A.
Torino REA n. 582955

General Partner:
Externa Italia s.r.l. with sole shareholder
Via Ferrua 4, 10064 Pinerolo (TO) Italy

Bank Details:
Deutsche Bank – Branch E - Corso Siracusa 105 -
Turin
IBAN IT82M0310401005000000031142
Swift (BIC) DEUTITM1735

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4. Respect for health, safety, and the environment

The Supplier undertakes to respect and to ensure its suppliers respect all the regulations in force relating to the protection of the environment and to the prevention of accidents.

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

Failure to comply with the legal regulations will allow the Buyer to immediately suspend all the existing supply agreements, as well as to request payment of all direct and indirect damages that may derive from failures to deliver, herein including any other costs incurred for supplies from other sources.

- The Supplier does NOT have an environmental management system.
- The Supplier does have an environmental management system.
 - o ISO 14001
 - o Other please specify:
- The certification was released by on (attach document)

- The Supplier does NOT have a work health and safety management system
- The Supplier does have a work health and safety management system
 - o ISO 45001
 - o Other please specify:
- The certification was released by on (attach document)

5. Code of Conduct

The Supplier declares that it has acknowledged the Guiding Principles, and Code of Conduct published on the website

<https://www.freudenberg.com/>

in the section: About us / Download / and undertakes to comply with the principles contained therein

Failure to comply with this commitment will give Freudenberg Sealing Technologies S.a.s. of Externa Italia S.r.l.u. the right to exercise the termination of all existing agreements and the right to request compensation for further damages.

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IV– Legislative Decree no. 231 of 08 June 2001

6. General behavioural and monitoring principles

The Supplier declares that it is familiar with the content of Legislative Decree no. 231 of 08 June 2001 and that it undertakes to refrain from behaviours that would constitute the offences referred to in the same decree, irrespective of the actual commission of the offence or whether the same could be punished.

Failure to comply with this commitment will give Freudenberg Sealing Technologies S.a.s. of Externa Italia S.r.l.u. the right to exercise the termination of all existing agreements and the right to request compensation for further damages.

- The supplier declares that it has an Organisation, Management and Control Model pursuant to Legislative Decree 231/2001
- The Supplier declares that it does NOT have an Organisation, Management and Control Model pursuant to Legislative Decree 231/2001

We confirm that we have received, understood, and accepted the document “Confidentiality agreement, Sustainability and Ethics, Legislative Decree no. 231 of 8 June 2001”, in the edition and revised edition identified at the foot of this document and that the declarations contained therein

correspond with the truth

On behalf of the Firm..... Legal representative Date

The following clauses are specifically approved pursuant to and in accordance with arts. 1341 and 1342 of the Italian Civil Code:

1) Confidentiality agreement; 3) Respect for the environment and Safety; 4) Ethics; 5) General behavioural and monitoring principles;

On behalf of the Firm..... Legal representative Date