

UK TAX CULTURE

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1 Introduction

Freudenberg is a multinational group of companies, organized in Business Areas and Business Groups. Given the size and extent of our global presence, Freudenberg entities are subject to a large number of tax jurisdictions and a wide variety of tax rules. Freudenberg is fully committed to comply with all applicable tax rules in line with the group's Code of Conduct as well as our Guiding Principles and Business Principles.

Freudenberg recognizes that violations of such tax rules can result not only in significant financial losses, but also in serious penalties, including imprisonment and fines, as well as reputational damage.

The Board of Management of Freudenberg SE and the Management Board of Freudenberg & Co. KG express their absolute commitment to this UK Tax Culture. The Board of Management of Freudenberg SE and the Management Board of Freudenberg & Co. KG expect all UK entities and all employees in charge of taxes, to fully comply with this UK Tax Culture.

The UK Tax Culture is derived from the Freudenberg's Tax Culture and any differences between the two documents relate solely to additional detail provided in the UK Tax Culture to ensure compliance with paragraph 16(2) and paragraph 25(1) Schedule 19 Finance Act 2016.

2 Freudenberg's Tax Compliance Management Culture

Freudenberg is committed to observe all applicable tax rules, including reporting and disclosure requirements, wherever there is a requirement to do so as a result of businesses presence and transactions, in line with our Code of Conduct.

All taxes are paid and tax declarations are filed according to applicable tax rules in the countries where Freudenberg operates.

As a good corporate citizen Freudenberg considers taxes as an important part of its social responsibility.

2.1 Governance

Freudenberg commits to act responsibly in relation to tax affairs, to fulfill compliance obligations, and to operate in accordance with all applicable tax rules. Furthermore, Freudenberg's economic contributions, of which taxes form a part, is important and the group aims to ensure that it pays the right amount of taxes in each country in which it operates and complies with tax declaration obligations in each country.

Freudenberg understands the value of reporting to stakeholders and endeavors to provide balanced communication of its tax affairs.

2.2 Tax planning

Freudenberg aims to be efficient with its tax affairs and considers the intention of the tax law in its business activities. In addition, Freudenberg structures its business activities in accordance with sound commercial and economic reasoning and does not engage in any tax avoidance schemes. This includes arrangements which take advantage of the technicalities of a tax system or of mismatches between two or more tax systems solely for the purpose of reducing the tax liability.

2.3 Tax risk management

Tax risk management is part of Freudenberg's Risk Management. Freudenberg will manage tax risks in line with its group governance framework and procedures.

The tax risks faced and managed by Freudenberg may be transactional risks, operational risks, financial accounting risks or tax declaration risks. In addition, reputational and legal risks associated with non-compliance with tax laws are also considered and managed.

Tax risk management includes risk assessment and risk treatment. The risk assessment involves a three stage process of risk identification, risk analysis and risk evaluation. As part of the risk treatment Freudenberg will consider whether to accept, mitigate, transfer or terminate the risk. Key tax risk areas are monitored.

Freudenberg's tax risk management is subject to a continual performance evaluation and improvement.

2.4 Relationship with Tax Authorities

Freudenberg aims to achieve and maintain respectful relationships with the tax authorities or any other relevant authority of the jurisdictions in which it operates.

Freudenberg co-operates, communicates and corresponds with tax or other relevant authorities with a conduct based on honesty, fairness and integrity.

Furthermore, Freudenberg encourages the establishing of tax administration capability, and the promotion of efficient, fair and balanced tax systems.

3 Effective date

The UK Tax Culture is documented and endorsed by the Board of Management of Freudenberg SE and the Management Board of Freudenberg & Co. KG below. It shall remain valid until it is either replaced by a revised UK Tax Culture or otherwise terminated.

The publication of this document is regarded as compliance with the duty under paragraph 16(2) and paragraph 25(1) Schedule 19 Finance Act 2016.

Weinheim, 16 November 2017



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