



TRELLEBORG

Our Code of Conduct

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Our business principles

At Trelleborg, we work to create added value for our stakeholders without compromising the high standards we set in terms of our environmental and social responsibility.

We support and operate our business in accordance with the Ten Principles of the UN Global Compact, the general concepts expressed in the International Labour Organization (ILO) conventions and the OECD Guidelines for Multinational Enterprises.

Our Code of Conduct, combined with our rules of corporate governance and our policies, provide the framework for our operations. The Code is applicable to all employees, officers and Board members of the Trelleborg Group, in all markets and at all times.

Trelleborg encourages suppliers, sales agents, consultants and other business partners to adopt the Global Compact principles as well as those in our Code of Conduct. The Code of Conduct was adopted by the Trelleborg Board of Directors in April 2007.



Sören Mellstig, Chairman of the Board



Peter Nilsson, President and CEO



How to apply the code

Every employee will receive a copy of the Code of Conduct and needs to understand and comply with it.

The Code of Conduct organizes and summarizes existing **Trelleborg policies** and should be used as a support tool laying down the principles on which our day-to-day work is based.

More detailed information can be found in the underlying policies. The current version of the Code, as well as all our policies, manuals and recommendations, can always be found on our intranet.

The officer responsible for the Code of Conduct and follow-up procedures is the **Senior Vice President, Human Resources**. At Group level, Trelleborg conducts training activities and provides information to support the implementation of the Code of Conduct.

It is the duty of **Trelleborg managers** to include the Code of Conduct in **employee training programs**.

Integrity concerns

We have a system accessible to all employees for raising integrity concerns.

Employees can apply the Group's **whistleblower policy** if they have reason to suspect that laws, other legal requirements or the Code of Conduct are possibly being violated. Every employee in the Group has the right, without fear of reprisal from anyone, to inform the designated compliance officers of any suspected criminal or seriously improper activity.

Using the Trelleborg Whistleblower Hotline:

When you want to leave a message:

- Use the telephone, or the Web at: www.trelleborg.com/whistleblower
- You can use your own language
- Your anonymity is protected

To find relevant phone numbers and other instructions, go to the **Group Intranet**. Select The Group/About Our Group/Code of Conduct/Whistleblower policy.






The 7 Golden Principles

Business at Trelleborg shall be conducted in accordance with the following principles:

- 1** We respect the rights of the individual, act in accordance with fair business, marketing and advertising practices and are committed to continuously developing the safety and quality of our products and processes.
- 2** We respect the rule of law, conduct our business with integrity and honesty and are accountable for our actions.
- 3** We continuously work to reduce the negative impact of our operations on the environment and health.
- 4** We do not engage in illegal operations or operate in the context of illegal activities.

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- 5 We do not tolerate the offering, solicitation or acceptance of bribes.
 - 6 We are all entitled to alert the designated compliance officers if we witness any violations of laws or of this Code of Conduct.
 - 7 Trelleborg listens to its stakeholders and takes their opinions into account with the objective of ensuring the sustainable success of our company.

What these principles imply in practice for Trelleborg's employees and suppliers is described in this brochure under three headings: Workplace and Environment, Marketplace and Society and Community.



Environment Health & Safety

Our fundamental principles shall contribute to ecologically sustainable development and to safeguarding the health and safety of all our employees.

ENVIRONMENTAL MANAGEMENT

- All production and development units shall implement and maintain a certified environmental management system in accordance with ISO 14001.
- We shall train and inform our employees about environmental, health and safety issues and involve them in a continuous improvement process.



ENERGY & MATERIALS

- We will work to increase our resource efficiency by reducing the consumption of energy and raw materials in our production and by finding ways to improve the recovery of materials and energy from production waste that we cannot reduce or avoid.

HEALTH & SAFETY

- We shall manage Health & Safety in accordance with the Group's common standards, as described in our Safety@Work Manual.
- We shall maintain good health and safety standards wherever we operate and work to minimize the risks and effects of accidents.
- We do not permit employees to be intoxicated at the workplace or to work under the influence of drugs.

DEVELOPMENT

- Environmental, health and safety aspects shall be taken into account in the development of products and processes.
- We shall take into account the effects on the environment, health and safety of the chemical substances used in our products and processes.



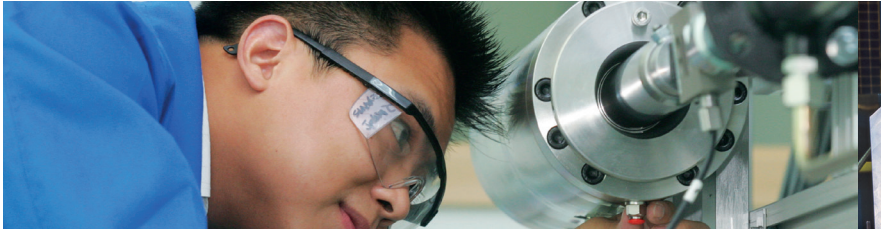
Fair employment practice

**Our fundamental principle is
that we respect our employees
and their human rights.**

- We will not apply special treatment to employees in regard to employment or work assignments on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinions, or social or ethnic origin.
- Trelleborg employees shall not harass or discriminate against any colleague or business partner for any reason.



- We will respect our employees' right to be represented by unions and other employee representatives, as well as their right to take part in collective employment agreements.
- Wages and salaries will be paid as agreed and on time. We will recognize good performance and extra efforts.
- We work for the abolition of child labor within our sphere of influence. The minimum age for working in our operations is 15 years, and not younger than the compulsory school age in individual countries.
- We do not allow illegal or forced labor in our own operations or in the operations of our suppliers or any other parties with whom we cooperate.



Development of human capital

**Our fundamental principle is that
we will provide appropriate training
to improve skill levels.**



- All employees are responsible for their personal development of skills and capabilities.
- In accordance with business needs, we will provide the opportunity to improve our employees' capabilities in order to develop their professional skills and enhance their social and economic opportunities.
- Competence development activities shall aim at creating the right conditions to fulfill present and future requirements.
- We will provide tools and training to support the implementation of the Code of Conduct, its components and underlying policies.



Conflict of interest

Our fundamental principle is that Trelleborg employees shall not participate in any activities that are in conflict with the interests of the company.




- A conflict arises when an employee's personal, social, financial or political activities have the potential to interfere with his or her loyalty or objectivity vis-à-vis the company.
- Employees shall avoid all situations in which there is a potential conflict of interest.
- Employees shall avoid personal or family financial interests in, or indebtedness to, enterprises that have significant business relations with Trelleborg.
- At the managerial level, Trelleborg does not accept outside employment without specific approval from the head of the business unit concerned, in accordance with the "Grandfather Principle" (approval also from the level above).
- All potential conflicts of interest shall immediately be reported to management.



Fair business

Our fundamental principle is that in all our business activities and relations with customers, business partners and authorities, sound business ethics must always prevail.

- We do not accept the offering, solicitation or acceptance of any form of bribes, whatever the form, method or purpose.
- The remuneration of agents shall be appropriate and for legitimate services only.
- We shall report our activities to combat bribery, money-laundering and extortion in a transparent manner.
- No employee shall seek or accept any gift, entertainment or personal favor that might reasonably be believed to have an influence on business transactions or which is contrary to applicable laws or customary business practice.

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- Gifts, entertainment, compensation or personal favors may be offered to a third party only if they are modest in value and consistent with applicable laws and customary business practice.

Competition

Our fundamental principle is that all entities and employees of the Trelleborg Group must at all times observe and be in compliance with applicable laws on competition.

- If there is any doubt regarding applicable competition law, legal advice must be obtained.
- Certain types of agreements that are particularly sensitive with regard to competition law must not be negotiated or entered into without the involvement of the legal department.

Suppliers

Trelleborg is committed to working with suppliers who adhere to our quality requirements and business principles. We will strive to support positive changes as regards quality, the environment and the work environment.

- Our ambition is to include the requirement of compliance with the Trelleborg Code of Conduct in supplier contracts.
- We will insist that suppliers follow legal requirements and work actively to reduce negative environmental and health impacts from processes, services and products. We will encourage suppliers to implement certifiable quality and environmental management systems.
- We will support and continuously monitor the performance of our suppliers.
- If a supplier is found not to be adhering to an agreed specification, we will consider appropriate actions, including demands for corrective measures, or termination of the relationship.

Product quality and safety

Our fundamental principle is to take all reasonable steps to ensure the safety and quality of the goods we supply.

- Our products shall meet agreed and legal standards for customer health and safety, including health warnings, product safety and information labels.
- We will offer sufficient, accurate and clear information regarding our products' content, safe use, maintenance, storage and disposal to enable our customers to make informed decisions.
- We will provide transparent and effective procedures to address customer complaints and contribute to a fair and timely resolution of customer disputes, without undue cost or burden.
- Our ambition is to assess, and address in our decision-making, the foreseeable environmental, health, and safety-related effects associated with our main products over their full life-cycle.



Supporting communities

Our fundamental principle is to contribute to a better society by supporting local communities where we operate.

- We will strive to hire and develop local employees and managers.
- We will promote local contributions to activities in the local communities.
- We will prioritize sponsorship agreements that benefit the societies and environments where we conduct our operations, and which support our values and strengthen our relations with customers and partners.
- We shall not make contributions to political parties or committees or to individual politicians.



Open and honest communication

Our fundamental principle is that all communication shall adhere to relevant legislation, regulations and standards. Our communication shall be transparent and honest.

- We are committed to being open and accurate within the limits of commercial confidentiality.
- Our communication shall be characterized by close relations with the Group's stakeholders and based on frequent contacts, clarity and strong ethics.
- As employees, we are all required to observe the applicable rules on preservation of confidentiality regarding the company's and the business partners' proprietary information, as well as any information that could potentially affect the company's share price.
- The CEO, CFO and heads of Corporate Communications and Investor Relations are company spokespersons and may make statements on behalf of the Group. Other managers are spokespersons within their own areas of responsibility.

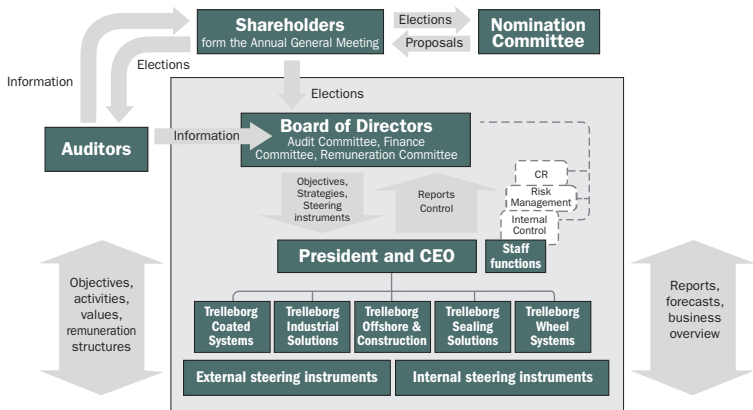
Corporate Governance

The guiding principles for good corporate governance are aimed at establishing favorable conditions for active and responsible ownership, a well-considered division of responsibilities between owners, the Board and company management, and transparency toward all stakeholders.

The Annual General Meeting is the Trelleborg Group's highest decision-making body. The meeting appoints the Board of Directors, which is responsible for sharing the management and control of the Trelleborg Group among the Board of Directors, its elected committees and the President in accordance with the Swedish Companies Act and other legislation, rules and regulations governing listed companies, including the Swedish Code of Corporate Governance, Trelleborg's Articles of Association and the Board's and its Committees' own internal control instruments.

Read more at www.trelleborg.com/corporategovernance.





Information about the Trelleborg Group

- Annual reports
- Interim reports
- Corporate Responsibility Report (www.trelleborg.com/cr)
- Press releases and other news
- The Trelleborg magazine T-TIME

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My notes:

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In the event of uncertainty regarding the Code's wording or its implications, the English version applies.

Belongs to:



www.trelleborg.com