



## **Trelleborg Modern Slavery and Child Labour Statement 2026**

**This statement is for the calendar year ending 31 December 2025.**

*Approved by the Board of Directors, Trelleborg AB, 23 April 2026*

### **1. Organisation Structure, Operations and Supply Chain**

**Trelleborg is a world leader in engineered polymer solutions, protecting the essential in society - people, the environment, infrastructure and, industrial equipment. The business is built to deliver robust growth and high profitability, based on market-leading positions. Business Structure and Operations**

Trelleborg Group employed approximately 17,200 people globally in 2025, operating manufacturing facilities and sales offices in over 40 countries across Europe, Americas, Asia and other regions. For further details, please refer to our 2025 Annual Report.

All our covered entities report sustainability matters to Group level quarterly. The Group's year to year performance with regard to all these areas will continue to be described in our Annual Report and in our Sustainability Statement.

#### **Supply Chain Overview**

Trelleborg engages approximately 20,000 suppliers concentrated in Europe, Americas and Asia. Main raw materials include synthetic and natural rubber, metal components, fabrics, and various additives.

Purchasing is a decentralized responsibility to operational units, except where business area or Group level purchases yield cost synergies, particularly for rubber materials and indirect goods and services.

#### **Supply Chain Mapping and Visibility**

Following our risk analysis based on third-party expertise (see below), risks for forced labour/human trafficking as well as for child labour are mainly perceived to be found in the supply chain of natural rubber at the farm/grower level. Farms/growers are not first tier suppliers for Trelleborg. However, we do ask our first-tier suppliers to apply the same screening and investigation rules in turn with their suppliers.

#### **Governance Structure**

Responsibility for modern slavery risk identification, assessment and response sits within our Group Sustainability function, with Board oversight. Our Vice President Group Excellence & Sustainability reports directly to the CEO and provides regular Board updates on sustainability matters

## 2. Code of Conduct

Trelleborg's Code of Conduct reflects our commitment to operate in accordance with:

- The Ten Principles of the UN Global Compact
- The ILO Conventions, including the Forced Labour Convention
- The OECD Guidelines for Multinational Enterprises
- The UN Declaration of Human Rights

Our Code sets behavioral principles for directors, employees and contractors, embodying our commitment to responsible business practice.

Each principle is supported by and references a range of Trelleborg policies and directives such as anti-bribery and corruption, conflict of interest, people, dealing with our suppliers and other third parties. All Trelleborg employees are responsible for knowing and following the ethical, legal, and policy/directive requirements that apply to their jobs and for reporting any suspected breaches of law or our Code of Conduct. Our executives and managers are accountable for creating and promoting a workplace environment in which compliance and ethical business conduct is expected and encouraged.

These rules and principles are to be clearly understood by everyone in the organization, regardless of position, and they are valid in all markets and at all times. Trelleborg requires suppliers, sales agents, distributors, consultants and other business partners to adopt the principles in our Code of Conduct.

The Trelleborg Code of Conduct sets out key principles for the whole organization and clearly states that we do not tolerate forced or child labour in our own operations or in the operations of our suppliers and sub-contractors. The Trelleborg Code of Conduct was approved by the board of directors in April 2026 and is available for download at <https://www.trelleborg.com/en/about-us/code-of-conduct>.

### Zero Tolerance Policy

Our Annual Report 2025 states that zero tolerance applies to any child and forced labour. From our first GRI compliant sustainability report in 2007 to our current Corporate Sustainability Reporting Directive aligned reporting starting in 2025, Trelleborg has not recorded a single such case in its operations.

## 3. Risk Assessment and Management

### Risk Assessment Process

Trelleborg conducts annual modern slavery risk assessments of its suppliers with a focus on the top 100 suppliers at country level using internal expertise and third-party research, considering:

- **Geographic indicators:** Country-level prevalence, rule of law and enforcement capacity
- **Industry sector risks:** Risk profiles of sourcing sectors
- **Product and commodity risks:** Focus on natural rubber given documented risks at farm/grower level

## Identified Risk Areas

Based on our risk analysis (detailed in our Sustainability Statement of our Annual Report 2025), risks are primarily found in:

1. Natural rubber supply chain at farm/grower level: Not first-tier suppliers, but we require first-tier suppliers to apply equivalent standards to their suppliers through screening and investigation
2. High-risk geographies: Enhanced due diligence applied in identified regions
3. Sectors with documented risks, particularly those involving manual labour, including textiles and certain manufacturing processes.

## Risk Mitigation

Targeted mitigation measures include enhanced supplier screening of high-risk categories, working with suppliers to elevate their understanding and responsibilities, with corrective actions where required.

## 4. Due Diligence Processes

### Supplier Assessment

Suppliers representing more than 90% of reported relevant annual purchasing spend complete sustainability self-assessments (5-year validity) covering forced and child labour. In 2025 the completed sustainability self-assessments level was 92% (2024: 90%). Suppliers are encouraged to align with UN Global Compact Principles 4 (Eliminate Forced Labour) and 5 (Abolish Child Labour).

### Supplier Audits

Trelleborg aims to ensure that at-risk suppliers receive appropriate follow-up, which may include site audits when considered necessary based on screening outcomes. Depending on the situation, such audits can be carried out by internal teams or external specialists.

### Remediation

Where problems are identified, Trelleborg works with suppliers to develop corrective actions within agreed timeframes. We review evidence to justify closing findings. Persistent non-compliance may result in relationship termination. No supplier relationships were terminated for Code of Conduct violations in 2025 (2024: 0).

If child labour is identified in our supply chain, our commitment is clear: to ensure that children are protected against harmful work and are not prevented from accessing education. In all cases, the best interests of the child must guide remediation. Trelleborg will work with qualified child welfare professionals, social services, or specialist non-governmental organisations, alongside appropriate consultation with affected children and their families. Remediation measures will be proportionate to the severity of each case and may include support to address root causes such as lack of access to education or family income. For cases of forced labour, human trafficking, or other serious human rights violations, Trelleborg will take appropriate remedial action in line with the UN Guiding Principles on Business and Human Rights.

## 5. Training

Trelleborg's Code of Conduct applies organisation wide. Code of Conduct training is mandatory for new employees, with more than 90% of employees trained during 2024–2025. Our programme includes:

- Induction training: All new employees receive Code of Conduct training
- Refresher training: Periodic refreshers ensure ongoing awareness
- Delivery: E-learning modules supplemented by in-person training for relevant roles

Code of Conduct breaches are investigated and where relevant treated as disciplinary matters.

We engage with our suppliers to raise awareness of modern slavery risks through our Code of Conduct, best practice guidance and direct engagement with high-risk suppliers.

## 6. Assessment of Effectiveness

### Key Performance Indicators

Indicator	2025	2024	Target
Purchasing spend covered by supplier self-assessments	92%	90%	≥90%
Employees trained on Code (rolling 3-year period)	>90%	>90%	≥90%
Supplier relationships terminated for Code violations	0	0	N/A
Modern slavery incidents in own operations	0	0	0
Grievance reports related to modern slavery	All investigated	All investigated	100% investigated

### Grievance Mechanism

The Group's Whistleblower Policy enables employees to report suspected violations without repercussion, through multiple channels in the employee's own language. External stakeholders, including supply chain workers, may also use this mechanism. All 2025 reports were investigated and appropriate action taken where concerns were substantiated.

## **7. Regulatory Compliance**

### **Legislative Framework**

This Statement is published annually in compliance with:

- UK Modern Slavery Act 2015 (Section 54)
- Australian Modern Slavery Act 2018 (Section 16)
- California Transparency in Supply Chains Act (SB 657)
- US Federal Acquisition Regulation 52.222-50(b)

### **Reporting and Assurance**

Covered entities report sustainability matters to Group level quarterly. Performance is described in our Annual Report and Sustainability Statement. The 2025 Sustainability Statement was assured by Ernst & Young AB.

## **8. Country-Specific Requirements**

### **Country Requirement Australia**

#### **Organizational structure**

This statement is for Trelleborg Holdings Australia Pty Ltd, which has the following operating companies in Australia.

- Trelleborg Marine Systems Australia Pty Ltd
- Trelleborg Perth Pty Ltd
- Baron Rubber Pty Ltd

#### **Supply Chain**

Trelleborg in Australia engaged directly with approximately 1440 suppliers in 2025. In addition, our suppliers often have many suppliers of their own, who then also rely on suppliers.

#### **Consultation**

During the reporting period this statement covers, we have consulted with all companies we own or control in the development of this statement as set out in the organizational structure above. We discussed with them reporting requirements under the Australian Modern Slavery Act 2018, our Code of Conduct, trainings and e-learning on the Code of Conduct and supplier self-assessments which assist in addressing the compliance with the Australian Modern Slavery Act 2018.

### **Country Requirement United Kingdom**

#### **Organizational structure**

This statement is for Trelleborg Holdings UK Ltd and its following subsidiaries that are subject to the UK Modern Slavery Act 2015.

- Trelleborg Sealing Solutions UK Ltd
- Trelleborg Industrial Products UK Ltd

## 9. Our Commitment

Trelleborg remains committed to proactive efforts to address forced labour, human trafficking and child labour. We will:

- Encourage all suppliers to comply with modern slavery legislation
- Seek continual improvement opportunities
- Enhance supply chain transparency and due diligence
- Engage with stakeholders to share learnings and improve industry practices

*Peter Nilsson*

[Peter Nilsson \(May 26, 2026 17:05:28 GMT+2\)](#)

**Peter Nilsson, President & CEO, Trelleborg AB**