

Internal control over financial and sustainability reporting

Internal control over financial and sustainability reporting is included as a part of the overall internal control at Trelleborg, and constitutes a central component of Trelleborg’s corporate governance. The key goals are that internal control is appropriate and effective, provides reliable reports and complies with laws and regulations.

Trelleborg’s Board of Directors has concluded that the current Internal Control set up is sufficient from a corporate governance perspective and that there is no need for an internal audit function.

The starting point for the internal control process is the regulatory framework for internal control issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). According to COSO, the review and assessment are conducted in five areas where the control environment creates discipline and provides structure for the other four areas: risk assessment, control structures, information and communication, and monitoring.

Control environment

The control environment provides the basis for the internal control. One important aspect is that decision making, authority and responsibility are clearly defined and communicated between different levels within Trelleborg and that steering instruments, in the form of policies, manuals and recommendations, exist and are observed. See pages 30–31 for list of external and internal steering instruments.

The Board of Directors bears overall responsibility for financial reporting where the Audit Committee assists the Board by monitoring, for example, the efficiency of Trelleborg’s internal

control, internal audit and risk management. The responsibility for maintaining an effective control environment and the day-to-day work involving internal control is delegated to the President.

The Group’s Internal Control staff function serves as the Group’s internal audit function and reports to the Audit Committee and the Group’s CFO. The function focuses on developing, enhancing and securing internal control over the Group’s financial reporting by proactively concentrating on the internal control environment and by examining the effectiveness of internal control.

Risk assessment

Risk assessment aims to identify and evaluate the most significant risks, including risk of fraud and risks in connection with significant changes, that affect internal control within the Group.

The assessment results in control targets that ensure that the fundamental demands placed on external financial reporting are fulfilled and comprise the basis for how risks are to be managed through various control structures.

The risk assessment is updated on an annual basis under the direction of the Internal Control staff function and the results are reported to the Audit Committee.

Control activities

The most significant risks are managed through control structures in the Group. Management may entail that these risks are accepted, reduced or eliminated.

The control structures aim to ensure efficiency in the Group’s processes and good internal control and are based on minimum requirements for good internal control in defined processes.

Refer to the illustration on page 37.

Information and communication

The internal steering instruments are available to all relevant employees on Trelleborg’s intranet and are generally provided through training. Special campaigns are conducted covering, for example, the Group’s whistleblower system. All relevant employees annually confirm in writing their knowledge of, and compliance with, the Group’s internal steering instruments.

The Group’s Chief Financial Officer and the Head of the Internal Control staff function report the results of their work on internal control as a standing item on the agenda of the Audit Committee’s meetings. The results of the Audit Committee’s work in the form of observations, recommendations and proposed decisions and measures are continuously reported to the Board. The minutes of the Audit Committee

meetings are presented to the Board and the Chairman of the Audit Committee reports on its work.

External financial reporting is performed in accordance with relevant external and internal steering instruments.

Monitoring

Monitoring to ensure the effectiveness of internal control is conducted by the Board, Audit Committee, President and CEO, Group Management, the staff functions of Internal Control, Group Finance, Group Treasury and Group Tax, Excellence and Sustainability, as well as the Group’s companies and business areas.

Monitoring includes the follow-up of monthly financial reports in relation to targets, quarterly reports with results from self-assessments in the Group’s companies and business areas, and results from internal control review. Monitoring also encompasses following up observations reported by Trelleborg’s auditor.

The Internal Control staff function works in accordance with an annual plan that is approved by the Audit Committee. The plan is based on the risk analysis and encompasses prioritized companies, business areas and processes within the Group, as well as work programs and budgets.

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Activities in 2025

The Internal Control staff function conducted 61 internal audits in 22 countries during the year. Of these, 19 were IT security audits. Similar to the preceding year, the main focus was on North America and Europe, in addition to audits of a number of units in Asia. The total number of audits was on a par with 2024. Most of the internal controls were conducted by the Internal Control staff function in cooperation with internal resources from other staff functions with specialist competence in such areas as purchasing and finance, or jointly with controllers from various business areas.

The Legal Affairs staff function carries out legal reviews and follows an annual work plan presented to the Audit Committee. The plan is based on the risk assessment and encompasses prioritized companies, business areas and legal processes within the Group and specifies that reviews must be carried out at least every four years. In 2025, the Legal Affairs staff function conducted 33 legal reviews of subsidiaries in 18 different countries.

In conjunction with a legal review, subsidiaries are analyzed and examined in pre-defined areas, such as quality of contracts and compliance with Group policies and procedures in the following areas: export control, management of agents and distributors, prevention of bribery and corruption. Legal reviews are conducted according to a structured program in all regions where Trelleborg conducts operations, with the aim of reviewing each legal operating unit at least every four years.

The Group's lawyers act as internal reviewers, and the review results in a protocol indicating the status of the various control points. Thereafter, each operational unit is responsible for addressing any identified gaps and reporting back on the status.

Internal audits of IT security were carried

out by external IT consultants together with the Group IT staff function. In 2025, the Internal Control staff function also worked on a broad front with reviews of all processes and, apart from certain IT audits, all were carried out on site at the respective units.

Activities in focus in 2026

The number of planned internal audits amounts to approximately 70 and comprises about 50 units in some 20 countries. Geographically, the focus of the Internal Control staff function will remain primarily on Europe and North America next year, although a number of audits

will also take place in Asia. Except for some IT audits, the plan is that all internal audits will take place physically on site in the local unit. In 2026, the Internal Control staff function will continue to work broadly with reviews of all processes.

Legal reviews will continue in 2026 to the same extent as in 2025. Next year, the number of sustainability audits will be increased and these will be conducted according to the same process as for the other audit areas. Refer also to the section "Risk management and internal control over sustainability reporting" on page 57.

The following information is available at www.trelleborg.com:

- » Articles of Association
- » Code of Conduct
- » Corporate Governance Reports from 2007 and onward
- » Information regarding Trelleborg's Annual General Meetings from 2004 and onward (notifications, minutes, President and CEO's speeches, press releases)
- » Information regarding the Nomination Committee
- » Information regarding the principles for remuneration of senior executives
- » Information for the 2026 Annual General Meeting

INTERNAL CONTROL STRUCTURE OF THE TRELLEBORG GROUP

	Self-assessment	Internal Control	Training/Tools
Financial reports and reporting processes	<ul style="list-style-type: none"> ■ Group-wide reporting system with quarterly feedback (including selected sustainability related key figures) from subsidiaries. 	<ul style="list-style-type: none"> ■ Internal controls are conducted by the Internal Control staff function in cooperation with internal resources from other staff functions and external consultants. 	<ul style="list-style-type: none"> ■ Training programs in defined processes relating to minimum requirements for good internal control are carried out when necessary.
Purchasing process	<ul style="list-style-type: none"> ■ Companies respond to how they comply with the Group's minimum requirements for good internal control in selected processes. 	<ul style="list-style-type: none"> ■ Internal controls of IT security are carried out by the head of Group IT together with external consultants. 	<ul style="list-style-type: none"> ■ The purpose of the training programs is to raise awareness and understanding of efficient processes and good internal control.
Inventory process	<ul style="list-style-type: none"> ■ Deficiencies are identified, measures are planned and implemented by the companies. 	<ul style="list-style-type: none"> ■ Covers 8 selected processes and about 300 minimum requirements for good internal control. 	<ul style="list-style-type: none"> ■ Training programs are a forum for the exchange of experience and sharing best practice.
Sales process	<ul style="list-style-type: none"> ■ Encompasses approximately 130 subsidiaries. 	<ul style="list-style-type: none"> ■ Internal controls result in observations, recommendations and proposals for decisions and measures. 	<ul style="list-style-type: none"> ■ Training programs in defined processes related to minimum requirements for good internal control are also held as an integrated part of the internal audits.
Process for property, plant and equipment	<ul style="list-style-type: none"> ■ Covers 8 selected processes and about 300 minimum requirements for good internal control. 	<ul style="list-style-type: none"> ■ Identified deficiencies are followed up on a quarterly basis by business area controllers and the Internal Control staff function together with internal resources from other staff functions, where appropriate. 	<ul style="list-style-type: none"> ■ Material available on the intranet to provide employees access to standardized tools and documents, as well as examples of business solutions. Reporting manuals are used for sustainability.
IT security process	<ul style="list-style-type: none"> ■ All relevant employees annually confirm in writing their knowledge of, and compliance with, the Group's internal steering instruments. 		<ul style="list-style-type: none"> ■ For sustainability, bespoke webinars are organized to enhance data quality.
Remuneration management process, incl. pensions and other compensation			
Sustainability			

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