



Trelleborg UK Tax Strategy

The Trelleborg Group of companies (Trelleborg Group) is a world leader in engineered polymer solutions that seal, damp and protect critical applications in demanding environments. Its innovative solutions accelerate performance for customers in a sustainable way.

Trelleborg Group's ultimate parent company, Trelleborg AB (publ), is incorporated in Sweden and Trelleborg UK collectively refers to the entities within the Trelleborg Group based in the UK, as listed in Appendix 1.

Trelleborg UK's tax strategy is detailed below and outlines its approach to risk management and governance, tax planning, acceptable UK tax risk and working with HM Revenue and Customs (HMRC). The UK tax strategy is aligned to wider Trelleborg Group Policies and Directives, Risk Management and Corporate Governance. It has been adopted by the Board of Directors of Trelleborg UK companies.

This is Trelleborg UK's tax strategy for the financial year ended 31 December 2021 and applies from the date of publication for all subsequent years until it is superseded. It will be reviewed and updated annually and it is intended that this strategy document will comply with the requirements of Paragraph 19(2) and 22(2) of Schedule 19 to Finance Act 2016.

Reference to 'UK Taxation' has the same meaning as defined in Paragraph 15 of Schedule 19 to the Finance Act 2016 and includes, but not limited to:

- Corporation tax
- Indirect taxes (VAT, Stamp duty, Customs duties)
- Employment taxes (PAYE, National Insurance)

Approach to UK taxation risk management and governance

Trelleborg UK seeks to reduce tax risk by ensuring it has in place a robust tax control framework and that reasonable procedures are applied in relation to all processes which could affect compliance with its tax obligations. This encompasses the approach it takes to ensuring compliance with the Senior Accounting Officer and the Corporate Criminal Offence of the Failure to Prevent the Facilitation of Tax Evasion legislation, that is to ensure it has in place appropriate tax accounting arrangements, risk assessments and that there is system of monitoring, controls and regular reviews.

Responsibility for UK taxation lies with local legal entity management and finance teams, with support from Group departments such as Tax, Internal Control and Finance to ensure the wider Group's Values, Policies and Directives are adhered to.

Where necessary, for example where there is significant uncertainty as to the application or interpretation of tax law which might have a material impact on Trelleborg UK's financial position, advice may be taken from specialist third party advisers in order to ensure robust, appropriate decisions are made.

Attitude to tax planning

Trelleborg UK's tax planning aims to support the commercial needs of the business by ensuring that the companies' activities are carried out in the most tax efficient way whilst remaining compliant with all relevant legislation. The Trelleborg Group Code of Conduct together with the Corporate Governance framework, Group Policies and Directives sets the framework of rules and the boundaries for our business decisions.

Level of acceptable tax risk

Trelleborg UK identifies that tax risks may arise which, once identified are evaluated and monitored to ensure Trelleborg UK complies with its legal obligations and business responsibilities.

Relationship with HMRC

Trelleborg UK values the low-risk status it received in its most recent Business risk review and is committed to maintaining a professional relationship with HMRC by working collaboratively and entering into regular dialogue with Trelleborg UK's Customer Compliance Manager.

Appendix 1

Trelleborg UK Companies covered by this Tax strategy:

Trelleborg Holdings UK Limited	Bespic Limited
Trelleborg Offshore UK Limited	Fentek Marine Systems (UK) Limited
Trelleborg Retford Limited	CRP 1998 Limited
Trelleborg Marine Systems UK Limited	CRP Securities Limited
Trelleborg Rochdale Limited	Mobile Industrial Tyres Limited
Trelleborg Sealing Solutions UK Limited	Trelleborg CBI Holding Limited
Trelleborg Industrial Products UK Limited	CRP Holdings Limited
Trelleborg Wheel Systems UK Limited	Trelleborg Stanton Limited
Trelleborg Industrial Tyres UK Limited	Trelleborg Offshore Barrow-in-Furness Limited
International Tyre & Wheel Solutions Limited	Trelleborg Engineered Products UK Limited
Mitas Tyres Limited	Premia Group Limited
Interfit Limited	Watts Tyres Limited
Trelleborg Doncaster Limited	Signum Technology Limited
Dunlop GRG Holdings Limited	Copper Midco 2 Limited
Dartex Holdings Limited	Vee Bee Limited
Trelleborg Nottingham Limited	Filtration & Valves Limited
Copper Midco 1 Limited	Gall Thomson Environmental Limited
Copper Bidco Limited	Rolwey Group Holdings Limited
Vee Bee Filtration UK Limited	Race-Tec Sealing Limited
Gall Thomson International Limited	Mach-Tec Limited
Trelleborg Westbury Limited	Stella-Meta Limited
Blue Diamond Technologies Limited	
Permanent establishment of Trelleborg Offshore Norway AS	