

Governance disclosures

The *Governance disclosures* section of the Sustainability Statement describes Trelleborg’s work on material matters in the area in terms of policies, actions, targets and outcomes for the year. The main issues are in the area of *Business conduct*.

SIGNIFICANT EVENTS IN 2025 – GOVERNANCE DISCLOSURES

Business conduct

Zero tolerance applies to all types of bribery, corruption, cartels and other criminal and unethical behavior. In 2025, no confirmed cases of violations of the law were reported by any of Trelleborg’s companies. Read more about Trelleborg’s preventive work in business conduct on page 95.



Bribery, corruption and anti-competitive behavior

Trelleborg has been providing training in issues related to anti-bribery and corruption and anti-competitive behavior for many years, and in 2025 these training packages continued to be updated in response to new practices and legislation. This to further strengthen knowledge and awareness among employees of the area, which concerns preventing and managing incidents linked to business ethical behavior. Read more on pages 95–96.

Code of Conduct

For the Code of Conduct, the target is for all employees to undergo training in the Code at least once every three years. This target was reached in 2025. Read more on page 94.



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Governance – Business conduct

Material impacts, risks and opportunities

Business conduct is an area where any incidents could have significant negative impacts, although the likelihood of serious incidents is considered to be low. Corruption and competition issues are therefore high on the agenda for the Trelleborg Group. The risks are continuously reviewed and assessed for the all parts of the Group, including all locations and processes.

Affected parts of the value chain	Timeframes	Interaction with strategy and business model
Potential material impacts in Business conduct		
Violations of business conduct rules, anti-bribery and corruption as well as competition laws.	Own operations, own workforce, supplier and customer chain	Short – medium – long term
Preventing negative impacts resulting from violations of business conduct rules, anti-bribery and corruption as well as competition laws is an integral part of Trelleborg’s strategy and business model. The work is conducted through the Group’s Compliance Program, which influences decisions on business relationships, contract management and internal control systems. Failure to manage these issues effectively can have negative impacts on society, by distorting competition and by undermining institutions and confidence in legal systems and democratic processes in the communities where Trelleborg operates.		
Material financial risks in Business conduct		
Financial effects of confirmed violations of business conduct rules, anti-bribery and corruption as well as competition laws,	Own operations, own workforce	Medium – long term
Regulatory compliance has historically been a central area in Trelleborg’s business strategy. To prevent financial risks linked to violations of business conduct rules, anti-bribery and corruption as well as competition laws, Trelleborg works proactively throughout its operations, for example, by providing customized training programs. If the area is not managed effectively, there is a risk that customers, business partners and employees will be negatively affected by legal consequences, loss of business, loss of confidence and unethical business conditions.		

Description of the materiality assessment process

Business conduct is one of Trelleborg’s most central areas and includes the work of preventing and managing undesirable behavior across the organization. Material impacts are identified and assessed via the Group’s Enterprise Risk Management (ERM) process, which integrates risks related to business conduct into the overall risk profile. The Compliance Task Force, a forum comprising senior representatives from staff functions, plays a key role in monitoring risks and initiating improvement actions. The forum provides a

platform for analyzing incident data and ensuring that steering documents and processes are up to date.

The latest double materiality assessment was carried out in close cooperation between Group Legal and the Compliance Task Force to ensure that business perspectives were integrated into the risk assessment. The double materiality assessment is also reported to and confirmed by Group Management, the Audit Committee and the Board.



IAN ELCOCK
VICE PRESIDENT GROUP COMPLIANCE & LEGAL EMEA

“We have strengthened our business conduct efforts through e-learning courses on competition law, anti-bribery and anti-corruption, and introduced a Compliance Day at more than 20 sites, encompassing together more than 3,000 participants. Looking ahead, our focus will be on maintaining a high level of awareness of our ethical standards and fostering a culture where responsibilities and consequences are clear.”

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Policies or similar steering documents

Purpose and materiality	Scope	Responsibility for implementation	Third-party standards and stakeholders	Availability
Code of Conduct				
<p>Trelleborg's Code of Conduct is a central pillar of the internal sustainability work. The Code of Conduct defines the Group's policies and directives containing rules and principles governing day-to-day activities related to human rights, business conduct and other relevant matters where there exist potential material negative impacts or risks:</p> <ul style="list-style-type: none"> » Compliance (anti-bribery and corruption; competition; human rights; suppliers and so on). » Resources (health and safety; employment conditions; environmental responsibility). » Diversity (diversity and inclusion; non-discrimination). » Social engagement (supporting local communities; trustworthy communication). 	<p>Trelleborg's Code of Conduct applies to all Trelleborg Group employees. The requirement to comply with the Code of Conduct also applies to the company's suppliers, agents, distributors and consultants.</p>	<p>The Chairman of Trelleborg AB and the President & CEO are responsible for issuing the Code of Conduct.</p> <p>Trelleborg's Group function heads, business area presidents and business unit presidents are responsible for ensuring compliance with the Code in their areas of authority.</p> <p>All of Trelleborg's employees are expected to comply with the principles of the Code of Conduct.</p> <p>Violations of the Code of Conduct can lead to disciplinary action up to termination of employment or termination of third-party contracts.</p>	<p>Trelleborg's Code of Conduct and relevant Group policies and directives are based on internationally recognized conventions and guidelines, such as the UN Declaration of Human Rights, the ILO conventions, the OECD Guidelines for Multinational Enterprises and the UN Global Compact.</p> <p>The Code of Conduct is developed and updated in collaboration with internal stakeholders, with staff functions and business areas contributing expertise and practical experience to the process.</p>	<p>Trelleborg's Code of Conduct is available on the Group's intranet and at www.trelleborg.com.</p>
Whistleblower Policy				
<p>Trelleborg's Whistleblower Policy describes how every employee in the Group has the right to alert, without fear of retaliation from anyone, the Group's designated Compliance Officers of any suspected criminal activity or serious misconduct by another employee, including all supervisors, officers and managers in the Group. It also sets out the roles and responsibilities within management of whistleblower cases.</p>	<p>Trelleborg's Whistleblower Policy applies to all Trelleborg employees.</p>	<p>Trelleborg's President is responsible for issuing this policy and for implementing the sections of this policy.</p> <p>The Group's designated Compliance Officers are Senior Vice President, Communications and Senior Vice President, Human Resources as well as Senior Vice President General Counsel.</p> <p>Trelleborg's Group function heads, business area presidents and business unit presidents are responsible for the overall adherence to this policy within their respective areas of authority.</p>	<p>The Whistleblower Policy is developed and updated in collaboration with internal stakeholders, with staff functions and business areas contributing expertise and practical experience to the process.</p>	<p>Trelleborg's Whistleblower Policy and a summary in the form of a Quick Guide, translated into a number of languages, are available on the Group's intranet. All employees and external stakeholders have the ability to safely raise the alarm by phone or online. In addition, posters advertising the Trelleborg Whistleblower Hotline are displayed at the Group's production units.</p>
Anti-Bribery and Corruption Policy, Competition Law Policy				
<p>Trelleborg's Anti-Bribery and Corruption Policy describes key definitions and principles in <i>Business conduct</i>. The purpose of the Policy is to address material negative impacts and risks related to unethical or illegal business conduct.</p> <p>The Policy covers anti-bribery and corruption, including recommendations on hospitality, entertainment and gifts.</p> <p>Trelleborg's Competition Law Policy describes how competition laws are designed to create a fair and equal playing field for all businesses, and to eliminate cartels and other unfair behaviors and practices.</p> <p>Violations of competition laws distort competition, raise prices and put law-abiding companies at a disadvantage. Ultimately, this harms us all, which is why violations of competition laws are considered serious crimes in many countries, comparable to fraud, embezzlement, or theft.</p>	<p>Trelleborg's Anti-Bribery and Corruption Policy and Competition Law Policy apply to all Trelleborg Group companies and employees. They also apply to Trelleborg's suppliers, agents, distributors and consultants through a requirement to adhere to the policies.</p>	<p>Senior Vice President General Counsel is responsible for issuing the Anti-Bribery and Corruption Policy and the Competition Law Policy, and for implementing the sections of these Policies.</p> <p>Trelleborg's Group function heads, business area presidents and business unit presidents are responsible for ensuring compliance with these policies in their areas of authority.</p>	<p>Applicable local laws and regulations apply wherever Trelleborg operates. Trelleborg complies with the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises.</p> <p>The Anti-Bribery and Corruption Policy and Competition Law Policy are developed and updated in collaboration with internal stakeholders, with staff functions and business areas contributing expertise and practical experience to the process.</p>	<p>Trelleborg's Anti-Bribery and Corruption Policy, and Competition Law Policy together with summaries contained in Quick Guides can be found on the Group's intranet.</p>

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Governance of Business conduct

Group Legal is the oversight function for *Business conduct*, including issues related to corruption, bribery and competition. The corporate culture is enhanced through routine training, local Compliance Officers and the Group-wide Compliance Task Force, where guidelines and experiences are shared; see more information below. Internal audits, legal reviews, incident reports and whistleblower cases are among the tools used to evaluate compliance with policies and directives, providing a basis for continuous improvements and updates of steering documents.

- » Managers, middle managers and employees in Trelleborg’s operational activities are supported by Compliance Officers who are appointed annually by each Group company to act as a contact point for all compliance issues in their part of the business. To support them in this work, Compliance Officers complete a special training program where they move from bronze level to silver and gold as they learn how to help their colleagues deal correctly with all types of compliance issues that may arise in the course of their work.
- » The Compliance Task Force is a Group forum comprising relevant Trelleborg Group function heads where updates and information on compliance-related topics are shared. The Group Compliance function, which reports to Senior Vice President General Counsel, is responsible for the Group’s *Business conduct* programs.

★ Actions and resources

Trelleborg has allocated resources to operate and develop the Compliance Task Force and the Compliance Program, see below. Furthermore, investment is being made in business conduct training programs, which includes compliance days, digital platforms, learning tools and, where necessary, external expertise. This ensures that business conduct guidelines and processes are not only established but continuously developed.

- » The content of Trelleborg’s Group-wide **Compliance Program** has been routinely developed and, in addition to issues related to anti-bribery and corruption and competition law, also includes issues related to export control, data security, professional behavior and business conduct. Data on regulatory breaches (including any fines) in the areas of corruption and bribery, the environment, human rights and labor-related grievances are reported twice a year by all Group companies in the Group-wide reporting system.
- » **Training programs in business conduct:** In 2025, Trelleborg continued to roll out its updated training package on bribery and corruption, and competitive behavior in order to strengthen knowledge and awareness in these areas and thereby prevent and manage allegations or incidents related to business conduct. The training courses should be completed at least every three years by all managers and other employees in specific target groups. The training programs are targeted at employees who operate in the areas where the risk of bribery, corruption and anti-competitive behavior is deemed to be greatest. The target groups

Suspected irregularities are reported on an ongoing basis through available channels, such as the whistleblower function. Oversight takes the form of regular legal reviews. The number of implemented reviews is monitored and reported quarterly. The main findings from legal reviews of Trelleborg units are reported to Group Management, Vice Presidents Finance and Business Control at the business areas, and the Audit Committee. The general principle is that investigations of reported incidents of corruption and bribery must be separated from the chain of command involved in the case. The Audit Committee has oversight of business conduct and matters concerning whistleblowing, and receives reports from investigations regarding breaches of business conduct policies and investigations on whistleblowing. A report is made to the Board of Directors on material matters, refer to page 54.

encompass management positions as well as roles in administration, finance, human resources, legal, production, communication, purchasing, quality, sales and other relevant areas of responsibility. Classroom training courses, which were put on hold in 2024 as a new, updated training package in e-learning format was introduced (see below), were resumed in 2025.

- » Training in anti-bribery and corruption was launched in an upgraded e-learning format in September 2024. The content covers a review of Trelleborg’s Anti-Bribery and Corruption Policy and Whistleblower Policy (see more on page 94), relevant concepts, legal consequences of violations of the law, high-risk activities, risks in the area such as cash payments, gifts and entertainment, and contacts with government authorities.
- » Training on competition issues was launched in an upgraded e-learning format in April 2024. The training contains a review of Trelleborg’s Competition Law Policy (see more on page 94), relevant concepts such as cartels and agents, legal consequences of violations of law, and other material matters.
- » Training in the Code of Conduct contains a review of all parts of the steering document, and is targeted at all employees in the Group. Read more about Trelleborg’s Code of Conduct on page 94.

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Targets and outcomes

- » Zero tolerance in *Business conduct* applies to all types of bribery, corruption, cartel activity and other criminal behavior. No confirmed cases of violations of laws related to business conduct occurred in 2025. No cases of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises for Trelleborg’s own workforce or workers in the value chain were reported during the year.
- » For the Code of Conduct, the target is for every employee to undergo training in the Code of Conduct at least once every three years. This target was reached in 2025.
- » For the areas of bribery and corruption and anti-competitive behavior, all employees in specific target groups (see page 95) must take customized training courses every three years, and the key indicator is 90 percent at the end of the year. By the end of 2025, 95 percent (87) of the target group for anti-bribery and corruption had completed the course. For the competition target group, the figure was 95 percent (89).

Key indicators for Business conduct

All training in anti-bribery and corruption and also competition law are held in primarily e-learning format, and take approximately an hour to complete. Training in the Code of Conduct is provided both as e-learning and in classroom format. All employees who belong to a target group must undergo training at least once every three years. The figures that are reported in the table to the right show outcomes at the end of 2025.

Another central indicator in *Business conduct* that Trelleborg monitors and reports is the number of incoming reports via the whistleblower function. In 2025, 62 cases were reported via the available whistleblower channels. Cases reported during the year concerned primarily areas such as health and safety and discrimination (read more about the discrimination cases that were reported during the year on page 88).

BUSINESS CONDUCT

Target	Outcome 2025
Zero tolerance toward violations of business conduct regulations, anti-bribery and corruption legislation	Zero reported cases
90% of employees to undergo training in the Code of Conduct	99% of employees
90% of the target group to undergo training in anti-bribery and corruption	95% of target group
90% of the target group to undergo training in competition law	95% of target group

TRAINING PROGRAMS IN BUSINESS CONDUCT

	Target group	- of whom, managers
Training in anti-bribery and corruption law		
Total employees in the target group who must undergo the training	5,933	1,548
Number of employees who have undergone the training	5,661	1,508
Percentage of employees in the target group who have undergone the training	95%	97%
Training in competition law		
Total employees in the target group who must undergo the training	5,500	1,492
Number of employees who have undergone the training	5,231	1,447
Percentage of employees in the target group who have undergone the training	95%	97%
Training in the Code of Conduct		
Total employees who must undergo the training	16,291	
Number of employees who have undergone the training	16,056	
Proportion of employees who have undergone the training	99%	

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