

Trelleborg Wheel Systems, active in the design, manufacturing, and sales of tires (and rubber compounds and semi products) for agricultural and forestry vehicles, multipurpose truck (MPT) and earthmoving applications, motorcycles among others and rims. At the strategic center of these objectives are three priority core elements, strictly adhered to and maintained:

- Customer and Stakeholder Focus, the core value of all our activities, with the aim of offering our market a product of high-level quality, reliability, and security.
- Environmental Protection, a fundamental element in the management of our activities and related services, including pollution prevention and other specific commitments relevant to the organization’s functions.
- Worker Health and Safety, a key point in process regulation, in order to provide safe and healthy working conditions for the prevention of work-related injuries and illnesses.

In the pursuit of these objectives, all levels of our organization are committed to ensuring compliance with all standards and/or regulations, whether binding or voluntarily adopted, with respect to quality, environment, energy

efficiency, including the availability of information and resources, safety, health, and sustainability, and to work with an eye toward continual improvement. To this end, TWS has set up an organizational framework aimed at the efficient and effective coordination of all its activities, in which objectives, roles, responsibilities, activities, and resources are clearly identified and defined.

TWS is committed to focusing on the professional growth of personnel through the diffusion of its key values such as Customer Focus, Responsibility, Performance, Innovation, and active participation in the Trelleborg Manufacturing Excellence project. This encompasses all production activities, and has as its Vision:

SAFETY Zero accidents	QUALITY Zero defects
DELIVERY Always punctual	EFFICIENCY Zero waste

The use of state-of-the-art methodologies and systematic control of the effectiveness of all management processes, utilizing specific indicators, represents the bases for a

process of continuous improvement achieved through tools such as 5S, 6Sigma, TPM, and Problem-Solving and Risk-Based Thinking.

In line with Group objectives, TWS commits to:

- Adopt a focused approach to preventive analysis in the treatment of potential nonconformities and deviations from process control limits.
- Constantly work on reducing significant environmental aspects, maximizing the recovery of every reusable resource, energy efficiency requirements as well as reducing energy consumption.
- Guarantee our staff a work environment free of risk factors that may have an impact on their health and safety during the performance of all envisaged task activities.
- Continuously improve site performance in terms of Quality, Safety, and the Environment and Energy Efficiency including conditions governing the welfare of workers and plant operation environments.
- Activate appropriate communication channels with all staff. Assure consultation and participation of all workers and of their representatives with the aim of ensuring a continuous and profitable exchange of information.
- Assume the formal commitment to respond to any relevant request that may be received by any interested third party.

For this purpose, TWS Head Office considers the following to be essential:

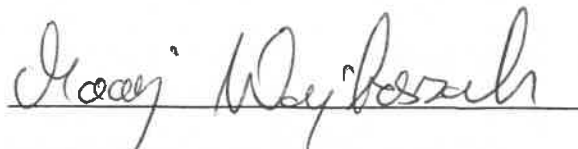
- Continuous monitoring of all aspects related to product quality, the environment, the energy efficiency and risks associated with machinery, and workplace and process operations, in order to promptly identify any deviations and adopt any possible preventive action.
- Ensure continual update of the mapping of environmental aspects and risks (accidents, occupational

diseases) for all activities and services carried out within all sites. These will be evaluated through the use of structured methodological approaches.

- Keep operational and security procedures activated and up to date.
- Promote company personnel training activities, education, information, and awareness in order to make all employees aware of their obligations and responsibility for achieving the expected results.
- Inform Suppliers and Contractors of requirements and (where applicable) internal procedures on Quality, Environment, Energy Efficiency requirements that support the purchase of energy efficient products and services and Health and Safety.
- Adopt and maintain an active integrated management system, certified according to ISO 9001, ISO 14001 and ISO 45001 including any and all future modifications.

This Policy Document and its objectives are provided to all levels of the company organization in order to guarantee knowledge of and disclosure to all personnel.

All Plant Manager, as Representative of Senior Management, assume the responsibility to promote and improve the Integrated Management System in their plants. Moreover, during any Management Review, verifies that this Policy Document, its objectives, integrated system, and the risk assessment documents with attachments, are consistent and appropriate, and in full compliance with all above commitments.



Maciej Wojtaszak, Plant Manager, Spartanburg
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