

Trelleborg Wheel Systems, working in the design, development and production of tires for the agricultural and forestry fields, maintains three priority core elements at the strategic center of its objectives:

- Customer Focus, the core value of all our activities, with the aim of offering our market a product of high-level quality, reliability and security
- Respect for the Environment, a fundamental element in the management of our activities and related services
- Worker Health and Safety, a key point in process regulation

In the pursuit of these objectives, all levels of our organization are committed to ensuring compliance with each specific standard or regulation, whether binding or voluntarily adopted, with respect to quality, environment, and safety, and to work with an eye toward continuous 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 involving all production activities, and which has as its Vision:

SAFETY Zero accidents	QUALITY Zero defects
DELIVERY Always on time	EFFICIENCY Zero waste

The use of state-of-the-art methodologies and a systematic control of the effectiveness of all management processes, utilizing specific indicators, represent the bases for a process of continuous improvement achieved through tools such as 5S, 6Sigma, TPM, and Problem Solving.

In line with Group objectives, TWS commits to continually improve of the Integrated Management System:

- Adopt a focused approach to preventive analysis in the treatment of potential nonconformities and deviations from process control limits.
- Constantly work on the continuous improvement of our environmental performance, reducing significant environmental aspects.

- We will focus on environmental protection, including pollution prevention.
- We will maximize the use of every reusable resource, as well as reducing energy consumption.
- We will eliminate the dangers and reduce the risks of work safety so we can 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, more generally, conditions governing the welfare of workers and plant operational environments.
- Activate appropriate communication channels with the aim of ensuring a continuous and profitable exchange of information with all internal staff, trade union representatives, external bodies, and, in particular, with the Control Bodies.
- Assume the formal commitment to respond to any relevant request that may be received by any interested party.

With reference to this, TWS considers the following to be essential:

- Continuous monitoring of all aspects related to product quality, the environment, and risks associated with machinery, and workplace and process operations, in order to promptly identify any deviations and adopt any possible preventive action.
- Keep the mapping of environmental aspects and risks (accidents, occupational diseases) updated for all activities and services carried out within the site, evaluating them 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.

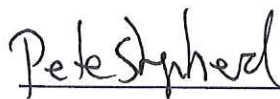
- Inform Suppliers and Contracting Companies of requirements and, where applicable, internal procedures on Quality, Environment, and Health and Safety.
- Adopt and maintain an active integrated management system, certified according to ISO 9001, IATF 16949 (in selected plants), ISO 14001, and OHSAS 18001 or ISO 45001.

TWS has decided to integrate the current management system in plant Tivoli with the operational requirements of the IATF 16949 standard (characteristic of the automotive sector) by 2020, with the objective of offering a constant and high-quality up-to-date product to the market, through the use of a systemic approach to the reduction of design and production process variability, throughout the length of the entire customer product supply chain.

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

The Plant Manager, as the Representative of Senior Management, assumes the responsibility to promote and improve the Integrated Management System. Moreover, during any Management Review verifies that this Policy Document, the objectives, the integrated system are coherent and appropriate, and that the commitments listed above are respected.

This policy document may be disclosed to any concerned party as an official statement of commitment by TWS.



Pete Shepherd, MITNA
March 2018,



Mike Shelton, TWSA