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Code of Conduct

Citira

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From the CEO

The tire industry is undergoing a significant shift, and Citira is positioned to play a key role in its transformation. Tires keep the world moving — and the way we produce, service and reuse them will shape the future of transportation.

Citira is proud to be a driving force in the transition toward a circular, low-carbon tire economy. We are rethinking every step of the value chain — from responsible sourcing to extending tire life and ensuring responsible end-of-life handling. Our solutions help customers increase uptime and mileage, reduce environmental impact, lower cost per kilometer, and meet safety requirements.

With our innovative solutions, committed teams, and a clear vision for sustainable progress, Citira is not just adapting to the future of the tire industry — we are helping to shape it. Our goal is not only to reduce the industry's negative footprint, but to fundamentally reshape tire management, ensuring a lasting positive impact on society.

At Citira, we uphold a zero-tolerance policy towards unethical behavior.

Our Code of Conduct sets clear expectations for everyone representing Citira – this includes our entire organization, subsidiaries, consultants and partners. It serves as a practical guide to how we work in the right way, outlining standards that protect anyone who works with, for, or relies on Citira.

By following this Code of Conduct and by working together, we strengthen our business, build trust, and accelerate the transition to a truly circular and low-carbon tire industry.

Thank you for being part of this journey.

David Boman

CEO
Citira

1. Our Values

1.1 Purpose

This Code of Conduct (later in this document referred to as “the Code”) applies to Citira Holding and its subsidiaries (later in this document referred to as “the Group”).

The Code defines what the Group stands for and reflects our commitment to ethical, responsible, and sustainable business practices, grounded in our values and aligned with legal and international standards.

The Code serves as a practical guide to help us act with integrity, make well-informed decisions, and contribute to a tire industry that is both circular and low carbon. By embedding these principles into our daily work and across our value chain, we build trust, strengthen our business, and support long-term sustainable development.

1.2 Scope and Applicability

The Code applies to everyone representing the Group — including all employees, consultants and partners across all countries where we operate.

The Group is committed to complying with all applicable laws and regulations in the countries where we are present. If local regulations differ from the principles outlined in the Code, we strive to uphold the highest ethical and sustainability standards, provided this does not conflict with legal requirements. Our commitment to responsible business practices goes beyond legal compliance; it reflects our ambition to lead with integrity and contribute to long-term positive impact wherever we operate.

In addition to the Code, the Group maintains more detailed policies and guidelines covering specific areas of our operations. All employees and representatives are expected to stay informed and understand the applicable policies relevant to their roles, ensuring that our values are consistently reflected in everyday decisions and practices.

1.3 Violations

The Group maintains a zero-tolerance approach to breaches of the Code. Failure to comply may result in disciplinary action, potentially including dismissal or legal consequences.

1.4 Reporting Concerns

The Group takes violations of the Code, internal policies, or applicable laws seriously — especially when they involve individuals acting on behalf of the company. Ignoring or failing to address such concerns may itself be considered a breach of the Code.

You do not need full proof to raise a concern — what matters is that you speak up. The Group is committed to creating an environment where everyone feels safe and supported in reporting misconduct. Retaliation against individuals who raise concerns in good faith will not be tolerated.

If you suspect a breach of the Code, underlying policies, legislation, or other misconduct, report it immediately to your immediate manager, local HR, your Group contact person, or through one of the Group’s whistleblowing systems. These systems allow reports to be made anonymously, verbally, or in person, and are designed to ensure professional and fair handling.

The Group currently provides separate whistleblowing systems in the countries where we operate: Sweden & Norway, Finland, and Poland. Employees and stakeholders should use the system for the country in which they work or engage with the Group. Employees working for Group-level functions should use the Sweden & Norway system.

For full details, please refer to the Group's *Whistleblowing Policy*.

2. Our Guidelines

The Group is committed to acting with integrity and maintaining a zero-tolerance approach to unethical behavior, including any form of corruption. Everyone representing The Group — including all employees, subsidiaries, consultants and partners — across all countries where we operate — are expected to act in the company's best interest and uphold our values in all professional interactions. Our ambition is to set a high standard for ethical conduct within the tire industry and contribute positively to society at large.

2.1 Act with integrity and comply with rules

The Group is committed to acting with integrity and in compliance with all applicable laws and regulations, and not to cause harm to its stakeholders or the image of the industry we operate within. Integrity is a fundamental building block of trust in business relationships.

The Group aims to achieve commercial success by relying on the skills, expertise, and collaboration of our people — not through dishonest, manipulative, or unlawful practices.

Our standards and expectations around ethical conduct and legal compliance are guided by relevant laws, international frameworks, and industry best practices. We continuously work to strengthen internal policies and training to support responsible behavior across all areas of our business.

What does this mean for you?

- *You must always comply with all applicable laws and regulations, as well as applicable internal policies/procedures adopted by the Group.*
- *Conduct business in a responsible manner and display loyalty to the Group in your day-to-day work and actively uphold integrity and honesty in all business activities.*
- *Acting ethically within the Group means keeping fair and reasonable promises — even when not legally required. Only make promises you can deliver on, and approach decisions with honesty, sound judgement, and respect for the facts and context.*

2.2 Act in fairness

The Group may be subject to antitrust laws and regulations in the jurisdictions where we operate, depending on the nature of our business activities.

We support fair and open competition and are committed to complying with all applicable antitrust rules. Violations can expose both The Group and individuals to serious consequences — including fines, legal liability, and reputational damage.

Our standards and expectations around fair competition are guided by relevant laws and industry best practices. We are committed to maintaining fair and open competition and will continue to develop internal guidelines and training to support compliance.

What does this mean for you?

- *You must never engage in, or contribute to, activities that violate antitrust laws and regulations, such as price-fixing, market-sharing, or bid-rigging, and should actively work to prevent the Group from being involved in such practices.*
- *You are expected to stay informed and act in accordance with relevant antitrust laws, including any related guidelines and training provided by the Group.*

2.3 Never engage in corruption or financial crime

Corruption involves offering, promising, giving, requesting, or accepting any form of improper benefit (directly or indirectly) — such as money, gifts, loans, favors, rewards, facilitation payments or other benefits, in connection with a person's role, position, or assignment.

Negligent financing of bribery means the act of providing money or other assets to a third party acting on the Group's behalf, which due to serious carelessness, may result in bribery or improper influence.

Trading in influence means giving or receiving an improper benefit in exchange for influencing someone else's decisions or action in their professional role.

Money laundering refers to the act of concealing or disguising the origin of funds obtained through criminal activity or assisting others in doing so. It also includes receiving or using money that comes from illegal sources.

Terrorist Financing means any dealings with funds or other assets for the purpose of financing terrorism.

The Group is committed to preventing corruption, trading in influence, negligent financing of bribery, money laundering and terrorist financing, fraud and other economic crimes in all its forms. These practices are unacceptable, undermine fair competition, and pose a serious threat to legitimate business activities. Violations of this kind can lead to severe legal consequences — both for the Group and for individuals involved — including criminal liability and reputational harm.

What does this mean for you?

- *You must never engage in, or contribute to, corruption, negligent financing of bribery, trading in influence or money laundering and you are expected to actively help prevent the Group from becoming involved in such practices.*
- *You are encouraged to raise any questions about potential corruption or financial crime with your immediate manager, local HR, or your Group contact person.*
- *You are expected to stay informed and act in accordance with relevant anti-corruption laws, including any related guidelines and training provided by the Group.*

2.4 Avoid conflicts of interest

A conflict of interest occurs when personal interests or relationships could influence, or appear to influence, your decisions or actions on behalf of the Group.

These situations can happen, and when they do, they should be handled openly and transparently. The Group aims to minimize decisions being made under conflict-of-interest situations, as they may compromise sound judgement, put the Group's interests at risk, and damage our reputation. Perceived conflict of interest should also be considered and managed/avoided, as such situations might harm the Group's reputation in line with situations of actual conflict of interest.

What does this mean for you?

- *You are expected to take necessary actions to avoid situations where personal interests could influence, or be perceived to influence, your decisions within the Group. This includes avoiding involvement in decisions where you, your family, or close contacts may benefit personally.*
- *You must not use the Group's name, business relationships, or your position at the company for personal gain or in connection with activities unrelated to the Group's business.*
- *You are encouraged to raise any questions about potential conflicts of interest with your immediate manager, local HR, or your Group contact person.*
- *You are expected to stay informed and act in accordance with relevant anti-corruption laws, including any related guidelines and training provided by the Group.*

2.5 Never violate sanctions or trade controls

The Group is committed to complying with all applicable economic sanctions and trade control laws in the jurisdictions where we operate. Economic sanctions may restrict business activities with certain countries, regions, individuals, or organizations. These sanctions can be broad — covering most transactions — or more targeted, applying to specific sectors, entities, or individuals.

Trade controls regulate the import, export, or provision of certain goods, technologies and services. Violating these rules can lead to serious legal consequences both for the Group and the individuals involved, and may also harm our reputation.

What does this mean for you?

- *You are expected to assess whether a potential project, transaction, or business partner may be subject to sanctions or trade controls and raise any questions with your supervisor or your immediate manager, local HR, or your Group contact person.*
- *You must never engage in, or contribute to, violation of sanctions or trade control laws, and are expected to help ensure the Group does not become involved in such activities.*
- *You are expected to stay informed and act in accordance with relevant sanctions and trade control laws, including any internal guidance or training provided by the Group.*

2.6 Protect company assets and intellectual property

The Group's assets — including property, equipment, intellectual property, and confidential information — are essential to our operations and must be protected. These resources should only be used for legitimate business purposes and handled with care and respect.

Confidential information about the Group — including all employees, consultants and partners across all countries where we operate — must always be safeguarded. Misuse or unauthorized disclosure can harm trust and damage relationships. We are committed to minimizing risks posed by cyber threats and will continue to strengthen our internal routines and training to support secure and resilient operations.

Our standards and expectations regarding cyber security and data protection — including practical examples and guidance — are outlined in country-level Cyber Security Incident Response Plans.

What does this mean for you?

- *You are expected to protect Citira's property and assets from loss, theft, or misuse, and to follow relevant security procedures — including staying informed about internal guidance, routines or training for managing cyber risks.*
- *You have a duty of confidentiality. You are expected to keep sensitive business information, whether related to the Group or our partners, secure and not share it without proper authorization.*
- *You are encouraged to raise any questions about protecting the Group's assets and intellectual property rights with your immediate manager, local HR, or your Group contact person.*
- *You are expected to stay informed and act in accordance with country-level Cyber Security Incident Response Plans, including any related guidelines and training provided by the Group.*

2.7 Promote environmentally responsibility

The Group is committed to reducing its environmental footprint and supporting the transition to a more sustainable and circular tire industry.

Our focus is on four key environmental areas:

- Climate change: reducing greenhouse gas emissions and supporting the transition to a low carbon economy.
- Resource use and circular economy: optimizing material efficiency and promoting reuse and recycling.
- Pollution prevention: minimizing emissions — including particulate matter in the air — and reducing the release of harmful substances such as microplastics.
- Biodiversity and ecosystems: protecting natural habitats and reducing negative impacts on ecosystems.

What does this mean for you?

- *You are expected to support the Group's environmental ambitions in your daily work and help reduce our impact across operations and the value chain.*
- *You are encouraged to raise any questions about environmental responsibility with the Group's Sustainability Manager or your Group contact person.*
- *You are expected to stay informed and act in accordance with relevant environmental laws, including any related guidance and training provided by the Group.*

2.8 Promote social responsibility

The Group is committed to ensuring fair working conditions, safeguarding the health and safety of employees, and contributing to the development of the communities where we operate.

We strive to maintain a workplace free from harassment, discrimination, and bullying. We believe in equal opportunities and aim to foster an inclusive, respectful, and engaging work environment — where everyone can perform at their best and be recognized for their contributions.

The Group is committed to protecting and respecting the fundamental human rights of everyone affected by our operations. We expect everyone representing the Group to uphold internationally recognized human rights standards, as outlined in United Nations Global Compact (UNGC), OECD guidelines for Multinational Enterprises, ILO Declaration on the Fundamental Principles and Rights at Work, International Bill of Human Rights, UN Guiding Principles on Business and Human Rights.

The Group does not tolerate any involvement in activities that may contribute to human rights violations, including forced labor, child labor, or exploitation. This applies across all jurisdictions where we operate and reflects our commitment to ethical conduct and respect for human dignity.

What does this mean for you?

- *You are expected to contribute to a safe, respectful and inclusive working environment, and to treat others with dignity regardless of background or identity.*
- *You are encouraged to raise any questions about social responsibility with the Group's Sustainability Manager or your Group contact person.*
- *You are expected to stay informed and act in accordance with relevant labor and human rights laws, including any related guidance and training provided by the Group.*

3. Policy basics

Owner	David Boman, CEO
Editor	Fiona Halpin, Sustainability and Business Development Manager
Approver	CEO
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Reviewed	Annually
References	United Nations Global Compact (UNGC), OECD guidelines for Multinational Enterprises, ILO Declaration on the Fundamental Principles and Rights at Work, International Bill of Human Rights, UN Guiding Principles on Business and Human Rights
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4. Revision history

Revision	Revision date	Author	Policy Owner	Revision description
1.0	2024-10-01	Alexander Lindelöf	CEO	Introduction of first version
2.0	2025-12-01	Fiona Halpin	CEO	Reviewed for alignment with updated policy package.