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Supplier Code of Conduct



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1. Our Values

1.1 Purpose

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.

Citira can only achieve this by conducting our own operations responsibly and by encouraging our suppliers and business partners to uphold these same principles across the entire value chain. *Responsible business conduct* means respecting human rights, upholding fair labor practices, protecting the natural environment, acting with integrity in all business dealings, and complying with applicable laws and regulations.

This Supplier Code of Conduct (later in this document shortened to “the Code”) outlines the principles that we encourage our suppliers – and their subcontractors – to uphold when doing business with Citira.

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

This Code applies to all suppliers, contractors, consultants, and other business partners who provide goods or services to Citira – across all countries where we operate.

This Code is grounded in internationally recognized principles and standards, including:

- United Nations Global Compact (UNGC);
- International Labour Organization (ILO) Core Conventions and the United Nations Guiding Principles on Business and Human Rights (UNGPs);
- United Nations Universal Declaration of Human Rights (UDHR) and related international human-rights instruments, including the International Bill of Human Rights and Article 32 of the UN Convention on the Rights of the Child;
- United Nations Convention against Corruption (UNCAC);
- OECD Guidelines for Multinational Enterprises;
- Key management-system standards, including the principles of ISO 9001, ISO 14001, and ISO 45001;
- and other generally recognized economic, social, environmental, and ethical norms of responsible business conduct.

Tire- and rubber-industry-specific frameworks (where applicable):

- Global Platform for Sustainable Natural Rubber (GPSNR) principles for responsible natural-rubber production and traceability across the supply chain;
- EU Deforestation Regulation (EUDR) expectations for deforestation-free and legally sourced natural rubber and related materials;

- End-of-Life Tire (ELT) and Extended Producer Responsibility (EPR) schemes supporting circularity, recovery, and recycling;
- Chemicals-management frameworks relevant to tire and component supply (e.g., EU REACH and equivalent regulations).

It is the Supplier's responsibility to ensure that its employees, relevant affiliate companies, and subcontractors are informed of the principles described in this Code.

1.3 Violations

Should the supplier be involved in any negative press, investigation, or violation of this Code, they should rely this information to the Supplier's primary contact at Citira. Violations can also be reported anonymously and confidentially via Citira's country level Whistleblowing systems.

1.4 Reporting Concerns and Continuous Improvement

- **Introduction of the Code**
Citira introduces this Code when discussing and formalizing agreements with suppliers and business partners for the provision of products and/or services.
- **Commitment and Transparency**
Citira encourages all suppliers to familiarize themselves with this Code and to align their practices with its principles. Upon request, suppliers are expected to provide relevant information or documentation to demonstrate how they address key areas covered by this Code.
- **Management Systems**
Suppliers are encouraged to establish management systems appropriate to the size, complexity, and risk level of their operations to help align with this Code.
- **Good Practices for Responsible Management**
Such management systems may include:
 - identifying, assessing, and managing risks, preferably with measurable targets;
 - monitoring performance and identifying potential gaps or areas for improvement;
 - investigating and addressing issues if significant concerns are identified;
 - communicating and providing training to employees, subcontractors, and suppliers on relevant topics covered by this Code.
- **Reporting Concerns or Breaches**
Citira expects suppliers to be open and transparent if they become aware of any breaches or potential violations related to this Code. Suppliers should inform their main Citira contact as soon as possible. Concerns or suspected breaches can also be reported confidentially and, if preferred, anonymously through Citira's country level whistleblowing systems.
Please refer to Citira's *Whistleblowing Policy* for more information and guidance.
- **Corrective Actions and Collaboration**
Where gaps or breaches are identified, Citira will seek constructive dialogue with the supplier to agree on corrective actions and timelines for improvement. Termination of a business relationship would only be considered in cases of severe or repeated non-compliance.
- **Shared Commitment to Progress**
Citira and its suppliers share a commitment to continuous improvement in responsible business practices, with the aim of contributing to a more sustainable and ethical tire industry.

2. General obligations

2.1 Act with Integrity and Comply with Rules

Suppliers must comply with all applicable laws, regulations, and industry standards. All business records must be accurate and transparent.

2.2 Act in Fairness

Suppliers shall treat employees, partners, and communities with respect, fairness, and dignity. Decisions must be free from bias or discrimination.

2.3 Never Engage in Corruption or Financial Crime

Citira has zero tolerance for corruption and expects the same from suppliers. This includes:

- bribes, or improper benefits
- facilitation payments,
- embezzlement, fraud, money laundering
- manipulation of procurement processes
- concealment of conflicts of interest

Gifts and Hospitality

Suppliers shall not offer gifts, travel, hospitality, or benefits intended to influence, or appear to influence, business decisions.

Suppliers are expected to maintain internal policies and anti-corruption training.

2.4 Never Violate Sanctions or Trade Controls

Suppliers must comply with all applicable trade laws, export controls, and sanctions regimes. No goods, services, technology, or financial transactions may involve sanctioned entities or jurisdictions in violation of law.

2.6 Protect Company Assets and Intellectual Property

Suppliers must protect Citira's confidential information, intellectual property, technical data, and physical assets. Unauthorized use or disclosure is prohibited.

2.7 Data Protection & Information Security

Suppliers must:

- comply with applicable data protection laws, including GDPR where relevant
- maintain appropriate technical and organizational security measures
- report data breaches affecting Citira without undue delay

2.7 Promote Environmental Responsibility

Suppliers shall work to minimize environmental impact and support Citira's sustainability objectives. This includes:

- reducing greenhouse gas emissions (Scope 1–3)
- improving energy efficiency and increasing renewable-energy use
- complying with REACH and reducing hazardous substances
- managing waste and promoting circular material flows
- conserving natural resources and avoiding deforestation

Suppliers may be requested to share climate- or environment-related data to support Citira's sustainability reporting.

2.8 Promote Social Responsibility

Suppliers must respect human rights and uphold fair labor practices in accordance with ILO Conventions and national laws.

Suppliers must:

- Follow minimum age requirements under national laws and ILO Convention 138
- Provide special protections for young workers (15–18)
- Prohibit all forms of forced, bonded, or involuntary labor
- Not charge recruitment fees or retain workers' identification documents
- Ensure wages meet legal requirements
- Provide rest, working hours, and benefits in accordance with law
- Strive to pay wages that meet basic living needs where relevant

Non-Discrimination

No discrimination based on gender, ethnicity, religion, disability, age, sexual orientation, union membership, or other protected categories.

Freedom of Association

Workers must be allowed to join or form labor unions and engage in collective bargaining where permitted by law.

Health & Safety

Suppliers must ensure a safe and healthy working environment, including proper training, protective equipment, and emergency procedures.

2.9 Traceability and Information Sharing

Suppliers must maintain appropriate traceability and documentation for materials and processes relevant to Citira's industry and regulatory obligations, including:

- EUDR (deforestation-free supply chains)
- GPSNR natural-rubber traceability
- ELT and EPR reporting obligations
- Chemical compliance (e.g., REACH)

Suppliers must promptly inform Citira of any changes affecting traceability or material origin.

2.10 Right to Conduct Reviews or Assessments

Citira adopts a risk-based approach to supplier monitoring. While routine audits are not conducted for all suppliers, Citira reserves the right to:

- review relevant documentation
- request corrective action plans
- perform site visits or engage third-party auditors when risk justifies it

Suppliers must cooperate with reasonable requests. Persistent or severe non-compliance may lead to termination of the business relationship.

3. Policy basics

Owner	Olof Lethagen, Head of Procurement
Editor	Fiona Halpin, Sustainability and Business Development Manager
Approver	Olof Lethagen, Head of Procurement
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4. Revision history

Revision	Revision date	Author	Policy Owner	Revision description
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