



SUSTAINABILITY

*Topic analysis & framework 2026*

# WORD FROM *PRIMARENGAS*

Sustainability is an integral part of our daily operations, as our work is carried out in demanding environments where safety, reliability and efficiency are critical. Serving industrial customers with specialised vehicle fleets requires both technical expertise and sustainable operating practices.

Occupational safety and employee well-being are central to our business, supported by clear procedures, training and risk awareness. Our environmental impact is mainly linked to mobility, energy use and the lifecycle of tyres. Extending tyre lifespan through professional maintenance and retreading helps reduce environmental impact while delivering value to our customers.

Digitalisation increases the importance of information security and operational resilience in ensuring reliable services. Responsible business conduct, compliance with legislation and proactive risk management guide our operations and continuous development.

Matias Pasonen, Technology & Development



# ***ABOUT PRIIMARENGAS***

- **Company:** Priimarengas, (Polarvulk Oy)
- **Industry:** Heavy-duty tyre services
- **Services:** Tyre maintenance, installation and on-site services
- **Customers:** Commercial transport and industrial operators
- **Locations:** Lieto, Tuusula, Rauma (Finland)
- **Employees:** 13
- **Annual turnover:** ~ EUR 4 million
- **Operational focus:** Reliability and resilience, safety, regulatory compliance

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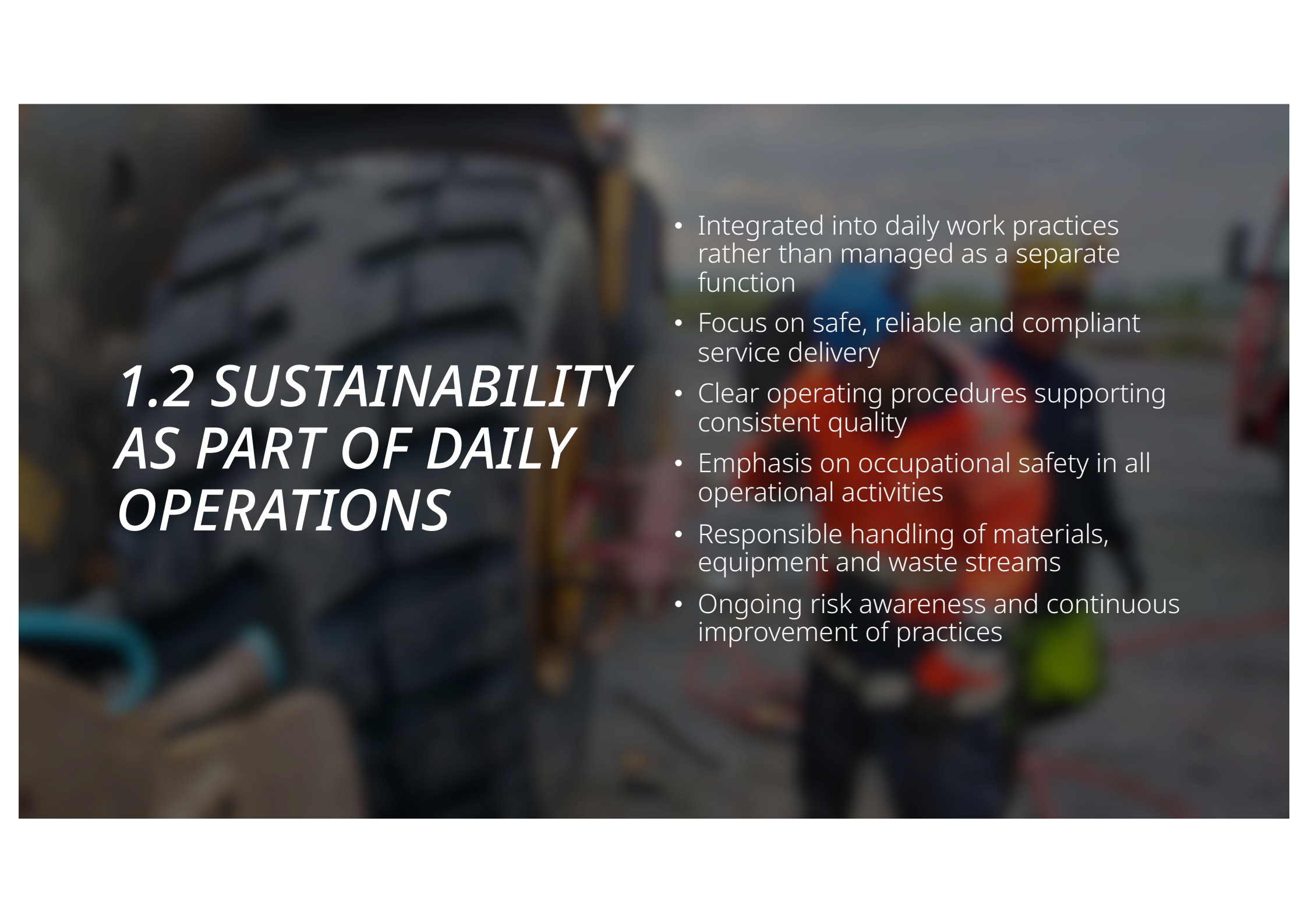
***1. OPERATING ENVIRONMENT AND THE ROLE OF SUSTAINABILITY IN BUSINESS***



## ***1.1 SPECIAL FEATURES OF THE INDUSTRY***

- Safety-critical operations performed in demanding environments
- Frequent on-site work near heavy machinery and commercial vehicles
- High importance of technical expertise and preventive maintenance
- Strong dependency on service availability and rapid response times
- Handling of large and heavy materials, including tyres and wheels
- Compliance with occupational safety, environmental and transport regulations





## ***1.2 SUSTAINABILITY AS PART OF DAILY OPERATIONS***

- Integrated into daily work practices rather than managed as a separate function
- Focus on safe, reliable and compliant service delivery
- Clear operating procedures supporting consistent quality
- Emphasis on occupational safety in all operational activities
- Responsible handling of materials, equipment and waste streams
- Ongoing risk awareness and continuous improvement of practices



A white van is parked in a desert landscape under a cloudy sky. An airplane is visible in the distance. A dark horizontal bar is overlaid on the right side of the image, containing the text '2. INTERNAL ANALYSIS'.

## 2. *INTERNAL ANALYSIS*



## *2.1 HOW THE RELEVANT ISSUES WERE IDENTIFIED*



Assessment of our core business activities and operational risks



Management review of key sustainability and compliance-related topics



Consideration of occupational safety, environmental and operational impacts



Review of applicable legislation and industry-specific requirements



Consideration of customer and stakeholder expectations



Focus on topics with the most significant relevance to daily operations

## ***2.2 KEY SUSTAINABILITY THEMES FOR PRIIMARENGAS***



### ***ENVIRONMENTAL***

Energy consumption and fuel use in operations

Tyre lifecycle management and waste handling

Efficient use of materials and resources



### ***SOCIAL***

Occupational safety and accident prevention

Employee well-being, competence and training

Fair and responsible working practices



### ***GOVERNANCE***

Compliance with applicable laws and regulations

Ethical business conduct and transparency

Risk management and operational continuity





### 3. *ENVIRONMENTAL SUSTAINABILITY*

## *3.1 PRINCIPLES OF ENVIRONMENTAL SUSTAINABILITY*

01

Minimisation of environmental impacts in daily operations

02

Efficient use of energy, fuel and materials

03

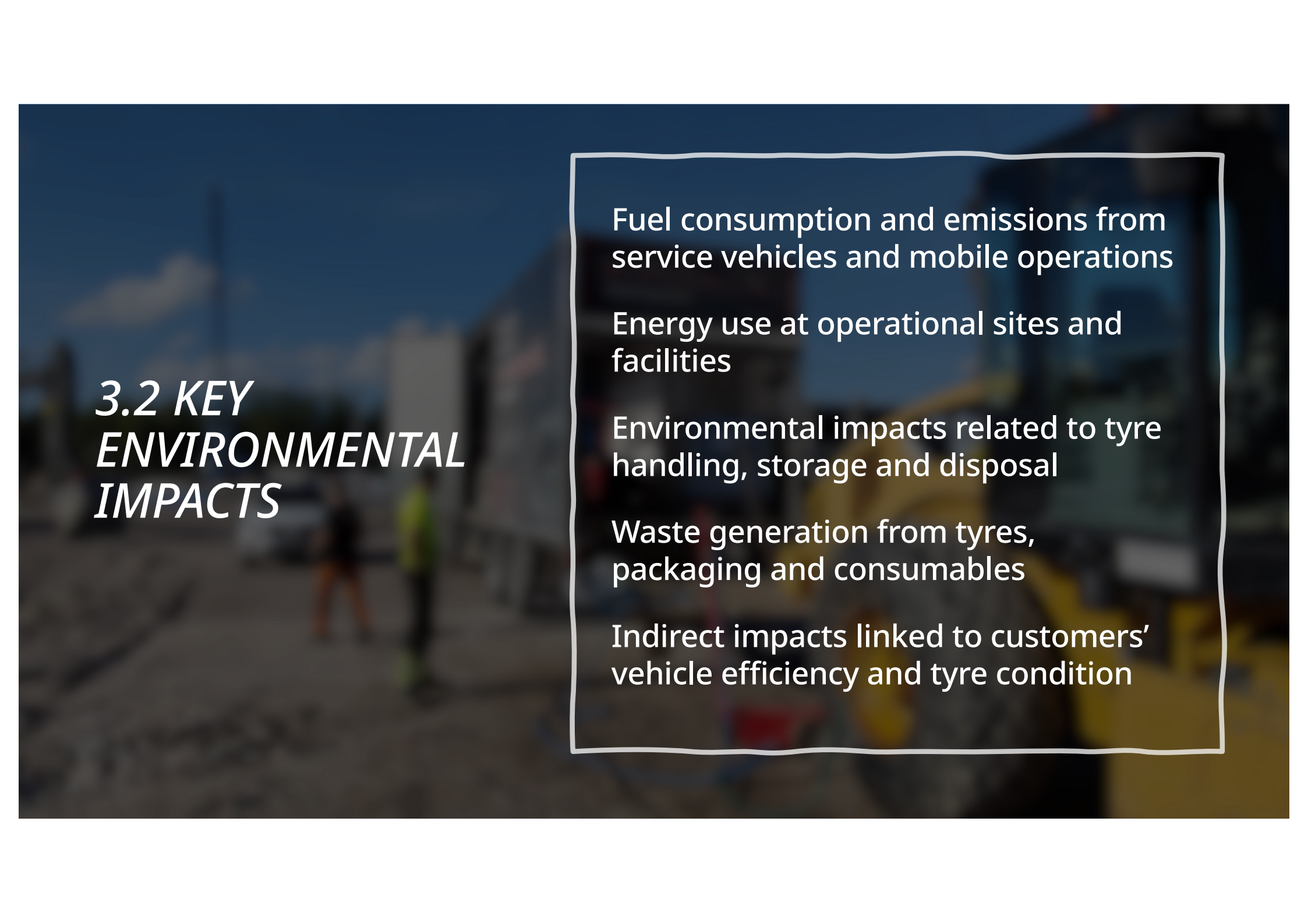
Promotion of extended tyre lifespan through maintenance and retreading

04

Proper handling, storage and disposal of waste and used tyres

05

Compliance with applicable environmental legislation and requirements



## ***3.2 KEY ENVIRONMENTAL IMPACTS***

Fuel consumption and emissions from service vehicles and mobile operations

Energy use at operational sites and facilities

Environmental impacts related to tyre handling, storage and disposal

Waste generation from tyres, packaging and consumables

Indirect impacts linked to customers' vehicle efficiency and tyre condition



### 3.3

## *ENVIRONMENTAL DEVELOPMENT WORK*



Promotion of tyre maintenance and retreading to extend product lifespan



Continuous improvement of fuel and energy efficiency in operations



Optimisation of service routes and on-site activities



Proper sorting, handling and disposal of waste and used tyres



Gradual renewal of equipment and vehicles where feasible



Regular review of environmental practices and operational impacts

## 3.4 *ENVIRONMENTAL INDICATORS*



Fuel consumption of  
service vehicles



Energy consumption at  
operational sites



Quantity of tyres sent for  
retreading and recycling



Amount of waste  
generated and properly  
processed

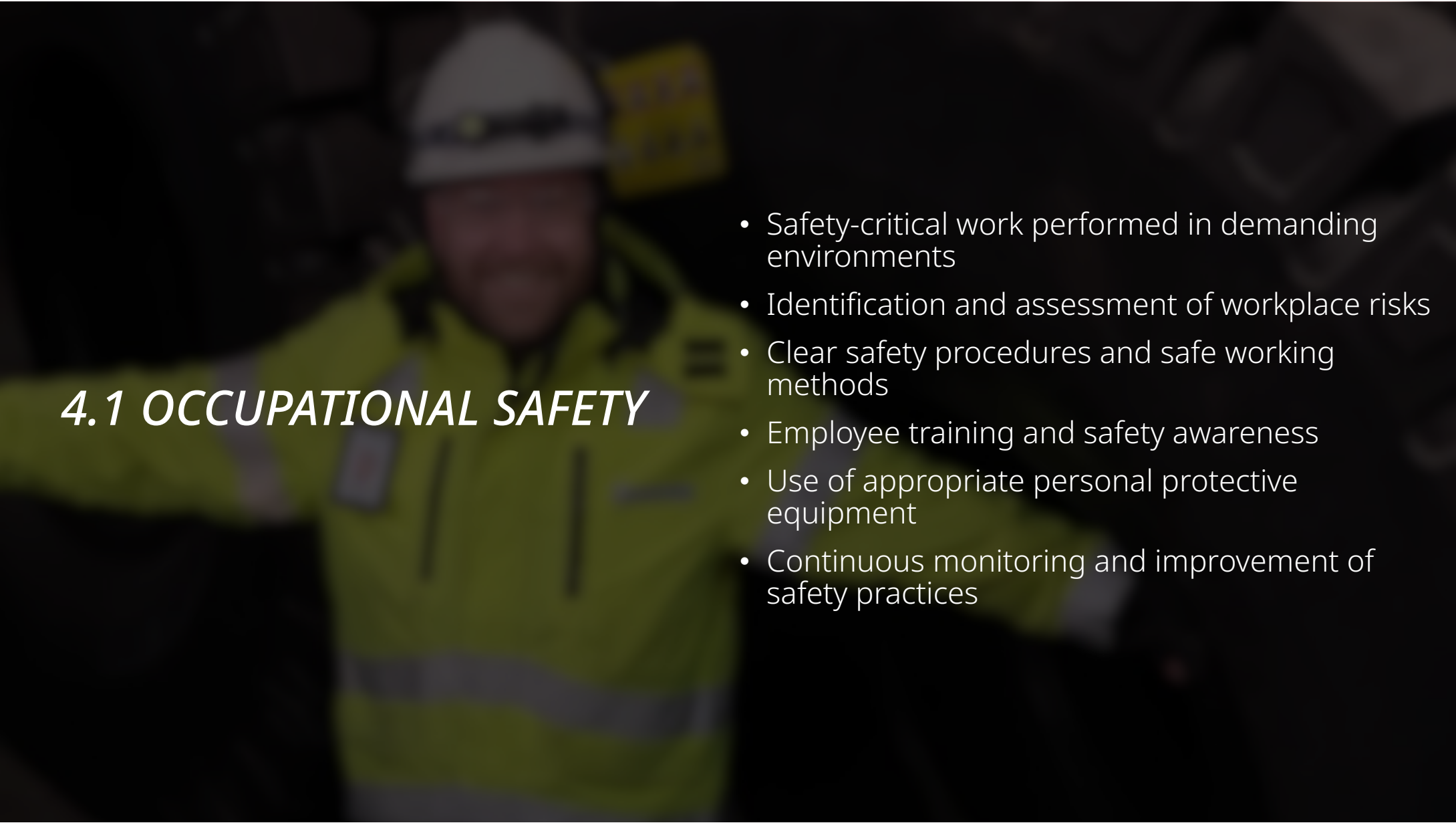


Monitoring of  
environmental incidents  
or non-compliances



## **4. *SOCIAL SUSTAINABILITY AND PERSONNEL***





## ***4.1 OCCUPATIONAL SAFETY***

- Safety-critical work performed in demanding environments
- Identification and assessment of workplace risks
- Clear safety procedures and safe working methods
- Employee training and safety awareness
- Use of appropriate personal protective equipment
- Continuous monitoring and improvement of safety practices

## *4.2 WORK WELL-BEING AND COMPETENCE*



Support for employee  
well-being and work  
ability



Clear onboarding and  
role-specific training



Continuous  
development of  
professional skills



Open communication  
and feedback  
practices



Fair and respectful  
working environment

## *4.3 EQUALITY AND FAIRNESS PRINCIPLES*

01

Equal treatment  
of employees in  
all operations

02

Non-  
discrimination  
and respect in  
the workplace

03

Fair recruitment  
and employment  
practices

04

Clear rules and  
expectations for  
conduct

05

Zero tolerance  
for harassment  
or inappropriate  
behaviour



## 4.4 SOCIAL INDICATORS



Occupational accident  
frequency



Sickness absence rate



Training days per  
employee



Employee turnover



Reported incidents  
related to workplace  
conduct



## **5. *GOVERNANCE, ETHICS, AND RISK MANAGEMENT***

## 5.1 *GOOD GOVERNANCE*



CLEAR ORGANISATIONAL  
STRUCTURE AND  
RESPONSIBILITIES



COMPLIANCE WITH  
APPLICABLE LAWS AND  
REGULATIONS



TRANSPARENT AND  
RESPONSIBLE DECISION-  
MAKING



INTERNAL CONTROLS  
SUPPORTING RELIABLE  
OPERATIONS



REGULAR REVIEW OF  
GOVERNANCE PRACTICES



## *5.2 ETHICAL PRINCIPLES*

01

Ethical and responsible business practices

02

Fair competition and integrity in all activities

03

Responsible relationships with customers and partners

04

Zero tolerance for corruption and misconduct

05

Compliance with applicable laws and regulations

A blurred background image showing three people in a meeting. A woman in the center is looking up and to the right, while two men are partially visible on either side of her, also looking in the same direction. The image is dark and out of focus, serving as a backdrop for the text.

## ***5.3 RISK MANAGEMENT***

- ***RISK MANAGEMENT***

- Identification and assessment of operational risks
- Management of occupational safety and environmental risks
- Ensuring business and service continuity
- Protection of information, systems and data
- Regular review and mitigation of key risks

- ***WHISTLEBLOWING AND REPORTING***

- Possibility to report misconduct or inappropriate behaviour
- Confidential handling of reported concerns
- Protection of individuals raising concerns in good faith
- Follow-up and corrective actions when necessary

## 5.4 GOVERNANCE INDICATORS



Compliance incidents and  
regulatory non-  
compliances



Reported ethical or  
conduct-related incidents



Risk assessments  
conducted



Governance-related  
training activities





## 6. *DIGITAL SUSTAINABILITY*



## ***6.1 DIGITALIZATION***

- Use of digital tools to support daily operations
- Improvement of service efficiency and availability
- Support for data-driven decision-making
- Integration of digital systems into operational processes
- Continuous development of digital capabilities
- Secure and responsible use of digital solutions

## 6.2 *DIGITAL RESILIENCE*



Protection of  
information systems  
and operational data



Ensuring availability  
and continuity of  
digital services



Risk assessment  
related to cyber and  
information security



Access control and  
secure use of  
systems



Employee awareness  
and training in  
information security



Preparedness for and  
response to digital  
disruptions







## ***7. OBJECTIVES AND DEVELOPMENT PLAN***

## 7.1 SHORT-TERM OBJECTIVES



Improve occupational safety practices and risk awareness



Enhance environmental efficiency in daily operations



Strengthen employee training and competence development



Improve consistency of operational processes



Develop governance and risk management practices



Support reliable and secure digital operations

## 7.2 MEDIUM- TERM DEVELOPMENT



Reduce operational safety risks through systematic development



Improve energy efficiency and reduce environmental impacts



Develop service processes and operational scalability



Strengthen digitalization and digital resilience



Enhance employee competence and retention



Further integrate risk management into daily operations





## 8. *SUMMARY*

Priimarengas operates in a safety-critical and demanding industry where reliability, compliance and operational continuity are essential. Responsibility is integrated into daily operations through a strong focus on occupational safety, efficient use of resources, and responsible business practices. Environmental, social and governance topics are addressed through practical measures aligned with the company's size and operations. Continuous development, risk awareness and digital resilience support the long-term stability and reliability of Priimarengas' business. This framework will set us on a path for building better tomorrow.



# ***DISCLAIMER & REPORTING BASIS***

- This document has been prepared voluntarily and does not constitute a statutory sustainability report or CSRD sustainability statement.
- Based on its current size and nature of operations, Polarvulk Oy is not subject to mandatory sustainability reporting requirements under the applicable CSRD framework or Finnish sustainability reporting legislation.
- The internal analysis and framework presented in this report have been prepared by Matias Pasonen to establish a structured approach for the company's future sustainability management and development.
- The framework is intended to support continuous improvement and to strengthen the company's readiness for future external sustainability assessments, ratings and certifications.
- Polarvulk Oy recognizes its role within wider industrial and logistics value chains, where sustainability, ESG performance and supplier responsibility are increasingly relevant requirements.
- Future sustainability KPIs and other reported metrics are based on information available from the company's own systems and third-party service providers. The accuracy and completeness of such information depend on the quality, availability and reliability of the underlying source data.
- Registry information and other externally sourced information are obtained from relevant public registers and service providers where applicable.
- Unless otherwise stated, the information presented in this document has not been subject to independent third-party assurance or verification.