



**Policy Title:** Supplier Core Expectations

**Policy Number:** TC-203-51-000

**Policy Category:** Global Supply

**Policy Owner:** Director of Global Supply

## POLICY STATEMENT

Tennant Company has a proud history of ethical business practices and is committed to protecting the environment and human rights. Our Supplier Core Expectation Policy (“Policy”) is founded on our Thriving People. Healthy Planet. sustainability framework. Tennant is committed to conducting business ethically, guided by the United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs) and the local customs, laws, regulations, and charters governing its suppliers and customers. These expectations are based upon the United Nations Global Compact, of which Tennant is a signatory, and the Responsible Business Alliance (RBA) Code of Conduct.

This document provides an overview of Tennant's core expectations for its supply base (“Suppliers”). Further details are set forth in the Supplier Manual, which includes all specific compliance and declaration requirements, along with guidance for operating within Tennant's Quality Management system. The Supplier Manual will be updated as required based on changes in applicable regulations or in the systems Tennant maintains to conduct business with our supply base.

Compliance with the expectations in this Policy is required to become or remain a supplier of Tennant. Suppliers also must hold their subcontractors and suppliers accountable for the expectations in this Policy. If Tennant determines that a Supplier is not meeting the expectations in this Policy, Tennant will offer guidance with respect to matters requiring correction or that need improvement. Tennant expects the Supplier to develop a corrective action plan to become compliant with this Policy. Under UNGP, Tennant can choose to continue to work with a Supplier in an effort to impact their compliance with Tennant's human rights, environmental and governance policies. However, notwithstanding the foregoing, Tennant reserves the right to cancel outstanding orders, suspend future orders or terminate its relationship with the Supplier, based on a Supplier's failure to comply with this Policy.

## APPLICABILITY

This Policy applies to all Tennant suppliers globally.

## POLICY

- 1. Compliance with Laws** – Tennant Company expects its Suppliers to comply with all applicable laws and regulations, implement responsible business practices, maintain just and decent working conditions for their workers, share Tennant's commitments to human rights and the environment, and



implement sound security measures. Through this partnership with our Suppliers, Tennant Company strives to create a healthier, cleaner, and safer world for all who inhabit it.

**2. Labor and Human Rights** – Supplier commits to respect the human rights of workers and to treat them with dignity.

**2.1 Prohibition of Forced Labor** – Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

**2.2 Child Labor** – We do not tolerate any form of underage labor (as defined under applicable laws). Tennant expects Suppliers to comply with all applicable local, national, and international laws regarding child labor.

**2.3 Working Hours, Wages, and Benefits** – We recognize that compensating employees and temporary workers and providing workers reasonable working hours are essential to meeting employees' and temporary workers' basic needs. As such, we expect our Suppliers to pay employees and temporary workers at least the required minimum wage, provide legally mandated benefits, and adhere to all applicable working hours and overtime compensation laws.

**2.4 Non-Discrimination/Non-Harassment/Humane Treatment** – Suppliers will treat each employee with respect and dignity and will not subject any employee to any physical, sexual, psychological, verbal, or other form of harassment or abuse. Additionally, no person shall be subject to any unlawful discrimination in employment (including hiring, salary, benefits, advancement, discipline, termination, or retirement) based on gender, gender identity, race, religion, age, disability, sexual orientation, nationality, political opinion, ethnic origin, marital or familial status, status with regard to public assistance, or any other applicable prohibited basis. Tennant prohibits harassment, discrimination, and other forms of retaliation against any individual who reports a violation of law or assists in the investigation of a claim.

**2.5 Freedom of Association and Collective Bargaining** – Suppliers shall recognize and respect the right of employees to the freedom of association and collective bargaining to which they are entitled according to applicable laws.

**3. Health & Safety** – Supplier shall strive to minimize work-related injuries, illnesses, and working conditions negatively impacting the health and safety of its employees.

**3.1 Occupational Health and Safety** – Suppliers shall be committed to the safety and well-being of all workers worldwide by providing a safe and healthy working environment. Suppliers shall provide a working environment that meets or exceeds industry standards and applicable health, safety, and fire safety regulations, and shall have corrective measures in place to minimize workplace hazards.

**3.2 Emergency Preparedness** – Suppliers shall maintain emergency contingency plans and actively identify and assess potential emergency situations to prevent and mitigate their impacts, as well as immediately report any incidents to the proper authorities.



- 3.3 Occupational Injury and Illness** – Suppliers shall ensure a safe working environment, which includes proper employee training, equipment maintenance, and the provision of personal protective equipment (PPE). Suppliers shall ensure workers can report any instances of concern without repercussion. Suppliers shall respect workers' rights to remove themselves from a situation that they believe poses an imminent and serious risk to health or safety without fear of retaliation.
- 3.4 Industrial Hygiene** – Suppliers shall provide a clean and safe working environment. Facilities shall be kept clean and monitored for occupational exposures; equipment and resources stored properly and safely; and walkways cleared to prevent injury and allow for emergency exits.
- 3.5 Physically Demanding Work** – Suppliers shall monitor and control workers' exposure to physically demanding work and provide rest and hydration periods to ensure workers' health and safety.
- 3.6 Machine Safeguarding** – Suppliers shall ensure equipment is maintained and evaluated regularly for safety hazards. Suppliers shall provide physical guards, safeguarding equipment, and barriers where machinery is located and/or operated.
- 3.7 Sanitation, Food, and Housing** – Workers shall be provided with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage and eating facilities. Worker dormitories provided by Suppliers shall be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, and adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.
- 3.8 Health and Safety Communication** – Suppliers shall provide workers with appropriate workplace health and safety information and training in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health- and safety-related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers.
- 4. Sustainability & Environment** – Tennant Company has a history of stewardship to the environment; as such, we expect our Suppliers to share the same commitment to protect the environment and conserve our shared natural resources. Climate change is the most pressing challenge facing the global community, and Tennant Company expects its suppliers to strive to reduce their impact across their operations. Suppliers play a significant role in reducing Greenhouse Gas Emissions (GHG), as well as reducing air and water pollution.
- 4.1 Environmental Permits and Reporting** – Suppliers must comply with all relevant national, regional, and local environmental laws and regulations. Additionally, Tennant Company advocates for partnership with Suppliers in reporting carbon emissions to accredited associations such as CDP. Tennant Company encourages suppliers to implement an environmental management system (EMS) such as ISO 14001.
- 4.2 Pollution Prevention and Resource Conservation** – Tennant Company expects its Suppliers to reduce pollution across its operations as a continuous effort, as well as to



increase efficiencies as it pertains to the use of raw materials as a means of conserving natural resources.

- 4.3 **Hazardous Substances** – Chemicals, waste, and other materials posing a hazard to humans or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.
- 4.4 **Solid Waste** – Suppliers shall work to minimize the amount of waste generated by its operations. This includes utilizing waste-reduction methods within production, using recycled materials in the manufacture of their products, and working to minimize excess packaging and use recycled & non-toxic materials whenever possible.
- 4.5 **Materials Restrictions** – Suppliers shall adhere to all applicable laws, regulations, and Tennant Company requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal. At Tennant Company's request, Suppliers are required to provide disclosures on the presence and amount of regulated substances in any materials supplied to Tennant that may be restricted by, or require disclosure to, governmental bodies, customers and/or recyclers. Please refer to Appendix A for additional detail.
- 4.6 **Water Management** – Water is a critical resource worldwide. Tennant Company expects its Suppliers to treat water as such. Suppliers must work to continually increase water efficiency in their operations and reduce contaminated water being added back into the supply. Any contaminated water that is created as part of business operations must be properly routed to designated systems and not put into the environment or water table.
- 4.7 **Energy Consumption and Greenhouse Gas Emissions** – Tennant Company reports on its Carbon Emissions annually and has a goal of achieving Net-Zero (as defined by SBTi) by 2040. This work includes reducing emissions across our entire value chain (Scope 3). To accomplish this, we must partner with our suppliers; we expect our suppliers to identify their carbon emissions, report them, and reduce them. To achieve meaningful reductions, Tennant Company encourages its Suppliers to build and validate a carbon emissions reduction plan. Tennant Company also expects Suppliers to provide carbon emissions data, both at a business level and Tennant Company purchasing level, when requested.

## 5. Ethics and Anti-Corruption

- 5.1 **Business Integrity and Anti-Corruption** – Tennant Company requires Suppliers to apply ethical principles consistent with Tennant's Code of Conduct, act with integrity and comply with all applicable laws, rules, and regulations. Tennant Company will perform due diligence on each Supplier with whom the Company desires to conduct business to ensure, to the extent possible, that they satisfy the requirements outlined in the Supplier Manual as a member of Tennant Company's global supply chain. This process will review the risks of violations of governmental sanctions and anti-corruption, anti-money laundering, and/or modern slavery legislation in an ongoing fashion.
- 5.2 **No Improper Advantage** – Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given, or accepted. This prohibition covers promising,



offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

- 5.3 **Disclosure of Information** – Suppliers shall transparently and accurately maintain business records. Information regarding Suppliers’ labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
- 5.4 **Intellectual Property** – Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.
- 5.5 **Artificial Intelligence (“AI”)** – Supplier shall transparently disclose its use of any form of AI, including but not limited to all data (input or outputs) collected, processed, generated, or used and the AI tools or models deployed. In addition, Supplier must comply with all applicable laws, regulations, and Tennant policies concerning AI.
- 5.6 **Fair Business, Advertising, and Competition** – Standards of fair business, advertising, and competition shall be upheld.
- 5.7 **Protection of Identify and Non-Retaliation** – Suppliers shall have adequate programs to address employee concerns about improper conduct. Suppliers shall communicate those programs, protect confidentiality, allow anonymity of raising concerns or reporting unless prohibited by law, and protect employees against retaliation.
- 5.8 **Responsible Sourcing of Minerals** – Tennant Company requires its Suppliers to comply with all applicable laws and regulations. We expect Suppliers to define, implement and communicate to sub-suppliers their own commitment to responsible sourcing of materials and legal compliance. Tennant Company expects Suppliers to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.
- 5.9 **Privacy & Cybersecurity** – Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
- 5.10 **Unethical of Illegal Conduct** – Tennant Company provides us with many outlets to report Ethics concerns and/or ask for help. You can access the Tennant Ethics Hotline [here](#) or by calling the Tennant Ethics Hotline. Click [here](#) to find the local number for calling in your area.

## 6. Management Systems

- 6.1 **Company Commitment** – Tennant expects Suppliers to establish a social and environmental responsibility policy affirming Supplier’s commitment to compliance and continuous improvement, endorsed by executive management and posted or otherwise made available in the Supplier’s facility (where applicable) in the local language.
- 6.2 **Management Accountability and Responsibility** – Suppliers shall identify senior executive



and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management shall review the status of the management systems on a regular basis. Suppliers shall have a process to assess that sufficient and qualified resources are assigned to their own Supplier Responsibility Code.

**6.3 Legal and Customer Requirements** – Suppliers must comply with all applicable laws and regulations of the jurisdictions in which the Suppliers are doing business, including but not limited to labor and employment laws and laws pertaining to product design, manufacture, packaging, labeling, importation, and exportation of those jurisdictions of the countries of manufacture and distribution. Commercial invoices and other necessary documentation must be provided in compliance with applicable laws. All products, unless specifically exempt under the applicable customs laws and regulations, shall be marked with the country of origin. See Appendix A for the updated list of specific compliance programs Tennant requires its Suppliers to uphold, declare, and maintain.

**6.4 Risk Assessment and Risk Management** – Tennant Company supply-chain partners are expected to mitigate risks and disruptions through a business continuity plan which shall include:

- a commitment from each Supplier's top management that a Business Continuity Management System (BCMS) is in place which outlines preparedness, protection, monitoring, containment, response, and recovery;
- recovery plans and procedures which are inclusive of employees, local infrastructure, facilities, and transportation;
- recovery plans and procedures which are documented, current, actionable, and available to review with Tennant Company when requested.

**6.5 Documentation and Records** – Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

**6.6 Supplier Responsibility** – Suppliers shall establish a process to communicate the requirements of this Policy to next-tier suppliers and to require suppliers to adopt management systems and practices materially consistent with this Policy.

## **7. COOPERATION WITH TENNANT COMPANY'S REQUESTS FOR INFORMATION.**

Suppliers are required to fully support and cooperate with Tennant Company's efforts to secure data including substance, labor, import, emissions and traceability declarations from their respective finished goods and raw materials supply chain. Tennant expects its Suppliers to engage their suppliers to define, implement, and communicate their own policy and to perform due diligence to provide the required information Tennant Company requests. Information provided must not misrepresent material supply chains and must include all known information as requested to be in good standing. Additionally, Tennant Company requires its Suppliers to be aware of and to comply with all data privacy and cybersecurity regulations.



Tennant Company may ask a Supplier for confirmation of compliance with the requirements of this Policy at any time, including before business is awarded. Any corrective action plans required to demonstrate or rectify non-conformance to this Policy will be according to a mutually agreed timeline and at no cost to Tennant. Suppliers must provide all requested declarations for regulations to which Tennant must show conformity.

A handwritten signature in black ink, appearing to read "Chuck Levene", written over a horizontal line.

Chuck Levene

VP – Global Supply Chain

# TENNANT<sup>®</sup>

## COMPANY

### EXCEPTIONS

None

### DEFINITIONS

None

### RELATED INFORMATION

[Appendix A](#)

[Supplier Manual](#)

### STANDARD REVIEW CYCLE

Two years

### ADDRESSING NON-COMPLIANCE

Failure to follow this policy may result in disciplinary action, up to and including termination.

To report suspected instances of noncompliance with this policy, please contact the Policy Owner or [corpcompliance@tennantco.com](mailto:corpcompliance@tennantco.com).

### QUESTIONS

Contact Director, Global Strategic Supply for questions.

### REVIEW AND REVISION HISTORY

**Effective Date:** 9/24/2024

**Revision Date:** 9/24/2024

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## Appendix A – Compliance Programs

Suppliers will receive requests for regulatory declarations directly from Tennant Company or from an authorized third party acting on Tennant Company's behalf. This list of regulations will be updated as required. The compulsory list is comprised of existing laws to which Tennant must conform. The pending/non-compulsory list is comprised of regulations that are not yet in effect, or that do not have a conformity mechanism. Any questions should be addressed to the Supplier's respective contact at Tennant Company.

### Compulsory

#### Forced/Child Labor

- USA Customs & Border Protection – Public Law 117-78 – UFLPA Uyghur Forced Labor Prevention Act

#### Substance-Level Restrictions and Reporting

- European Union – REACH (EC) 1907.2006
- European Union -- Waste Framework Directive 2008/98/EC
- European Union – RoHS 2011/65/EU
- United States – Toxic Substance Control Act including Chemical Safety for 21<sup>st</sup> Century Act

#### Substance-Origin Reporting

- United States – Dodd Frank Act Section 1502 Conflict Minerals

#### Sustainability/Scope 3 Category 1 Reporting

- European Union – Carbon Border Adjustment Mechanism
- European Union – Plastic Tax

### Pending/Non-Compulsory

#### Forced/Child Labor

- United Kingdom – Modern Slavery Act 2015
- USA State of California – Transparency in Supply Chains Act
- Australia
- Canada

#### Substance-Level Restrictions and Reporting

- Connecticut/Maine/Minnesota/New Hampshire PFAS regulations

#### Substance-Origin Reporting

#### Sustainability/Scope 3 Category 1 Reporting

- European Union – Corporate Sustainability Reporting Directive (CSRD)
- European Union – Corporate Sustainability Due Diligence Directive (CS3D)