

Global Anti-Human Trafficking Policy

This policy sets forth Tennant’s approach to combatting human trafficking and documents how Tennant complies with the requirements of Federal Acquisition Regulation (“FAR”) Subpart 22.17. This policy is consistent with Tennant’s Code of Conduct, Supplier Core Expectations, and our core values to protect and advance human dignity and human rights in our global business practices.

This policy applies to all Tennant employees, including directors, officers, and employees including those of Tennant’s subsidiaries; and applies equally to Tennant’s agents, distributors, third-party intermediaries, subcontractors, suppliers, distributors, and vendors.

Policy

Tennant has a zero-tolerance policy prohibiting trafficking-related activities. As required by law, and pursuant to Tennant Policy, Tennant and anyone working with Tennant or on its behalf shall not:

- Engage in trafficking of persons, which includes (A) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; and (B) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery;
- Procure commercial sex acts;
- Use forced labor in the performance of any contract;
- Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;
- Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work; or



- if required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing.

Exceptions

None

Related Information

Global Human Rights Policy

Standard Review Cycle

Two years

Addressing Non-Compliance

A potential violation of this Policy must be promptly reported to a manager, the Human Resources Department, or to the Law Department by phone, email, in person, or through the EthicsPoint Hotline. Contact information for the Ethics Hotline is available in multiple languages by accessing the Ethics portion of our website. Anonymous reporting is available, where allowed by law.

Concerns may also be reported by email at corpcompliance@tennantco.com or by writing to Ethics & Corporate Compliance at Tennant Company, 10400 Clean Street, Eden Prairie, MN USA 55344-2650.

Any manager or Human Resources personnel receiving notification of a potential violation of this Policy immediately shall report the matter to the Law Department so the Law Department immediately can make a disclosure to the U.S. Government if necessary. Tennant policy and federal law prohibit retaliation against those who make reports of misconduct and prohibit interfering with employees' cooperation with Government authorities investigating allegations of prohibited activity.

Legal Notice Update

We reserve the right to make any changes and corrections to this notice. Please refer to this page from time to time to review these and new additional information.

Questions

For further information regarding this Policy, please contact the Law Department.



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