



## Tennant Company Global Modern Slavery and Forced Labor Statement for the Financial Year Ending on December 31, 2024

### Tennant Company Modern Slavery Statement Overview

This statement is made pursuant to reporting requirements of applicable modern slavery, forced labor, child labor and transparency acts which require qualifying businesses to provide disclosures related to steps being taken to ensure that slavery, forced labor, child labor and/or human trafficking are not taking place in our supply chain or any other part of our business.<sup>1</sup> Tennant supports transparency from its business partners regarding efforts to deter forced labor, child labor, slavery, and human trafficking in our operations and supply chain. For purposes of this Policy, supplier and supply chain refers to Tennant's direct suppliers, which provide parts ultimately used in Tennant's machines placed on the market.

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 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.

### Tennant Corporate Structure, Business Operations, And Supply Chain

Founded in 1870, Tennant Company, headquartered in Eden Prairie, Minnesota, is a world leader in the design, manufacture and marketing of solutions that help create a cleaner, safer, and healthier world. We offer products and solutions consisting of mechanized cleaning equipment for both industrial and commercial use, detergent-free and other sustainable cleaning technologies, aftermarket parts and consumables, equipment maintenance and repair services, and business solutions such as financing, rental and leasing programs, and machine-to-machine asset management solutions. We are committed to developing cleaning technologies, including robotic solutions, which increase cleaning productivity.

Unless otherwise specified, reference to "Tennant", "we", "us", "Company" or "our" refer to Tennant Company, subsidiaries, and affiliates. This statement describes Tennant Company's and its subsidiaries' actions regarding modern slavery, forced labor, and human trafficking laws governing our business and supply chain for calendar year 2024 (January 1 – December 31). Subsidiaries subject to these laws:

Vaclensa Limited  
Nobles Floor Machines Limited

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<sup>1</sup> This statement is published in accordance with the provisions of the United Kingdom (UK) Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Cth), the California Transparency in Supply Chain Acts, the Norway Transparency Act, the German Supply Chain Due Diligence Act (LkSG), the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Canadian Act"), and the French Corporate Duty of Vigilance Law (Law n°2017-399, 27 mars 2017).



Tennant UK Limited  
Walter Broadley Limited  
Walter-Broadley Machines Limited  
Tennant Australia Pty Limited  
Tennant Sales & Service Canada ULC  
Applied Kehrmaschinen GmbH  
Tennant GmbH & Co. KG  
Tennant Verwaltungsgesellschaft GmbH  
IP Gansow GmbH  
Foma Norge AS  
Tennant S.A.  
InterClean Assistance ICA S.A.

This statement was produced in consultation with our subsidiaries to identify and assess modern slavery risks that may exist. The following corporate functions regularly meet and discuss the actions described in this statement:

- Global Supply Chain
- Product Regulatory
- Legal Ethics & Compliance

Tennant's global field service network is the most extensive in the industry. Tennant has manufacturing operations throughout the world and sells products directly in 15 countries and through distributors in more than 100 countries.

In 2024, Tennant worked with our global supply chain, consisting of over 2000 direct material suppliers from large multinational companies and small and medium-sized businesses, which include diverse suppliers. Our material suppliers can have suppliers of their own. Tennant is typically several tiers away from the original source of the components of our purchased materials, which emphasizes the importance of our suppliers having due diligence programs in place to also monitor supply chain risks. For purposes of this Policy, supplier and supply chain refers to Tennant's direct suppliers, which provide parts ultimately used in Tennant's machines placed on the market.

### **Addressing Modern Slavery Risks Through Policies, Training, Diligence**

Tennant's commitment to protecting human rights, including protection against modern slavery or forced labor, is guided by the Tennant Code of Conduct. Senior leadership, the Legal Department, and Ethics & Corporate Compliance is engaged in ensuring that Tennant's Code of Conduct is understood and followed by Tennant employees and our business partners.

Tennant's Global Compliance Counsel provides quarterly updates on compliance activities to the Audit Committee of the Board of Directors. Several Tennant leaders and functions are involved in compliance activities and initiatives, which include environment and social governance, employee health and safety, and human rights.



The following are expected of all Tennant employees:

- Know and uphold the guidance set forth in our Code of Conduct;
- Foster a positive, inclusive work environment and uphold Tennant's culture of integrity;
- Complete compliance courses and certifications on time;
- Report suspected violations of the law or Policy;
- Do not engage in workplace retaliation;
- Report any known or suspected retaliation; and
- Cooperate with investigations.

Tennant promotes an open-door policy and encourages employees to ask questions and report concerns to management, Tennant's Ethics & Corporate Compliance Department, the Legal Department, Human Resources, Tennant's Corporate Audit Department, or the Audit Committee of the Board of Directors.

#### **Policies**

Modern slavery encompasses several human rights issues, including forced labor, bonded labor, child labor, human trafficking, and slavery-like practices. Tennant's policies all reflect our commitment to acting ethically and with integrity in our business relationships and to implementing systems and controls with the aim of preventing these practices in our organization or supply chain.

- **Global Human Rights and Anti-Human Trafficking**

Tennant's Global Human Rights Policy and Anti-Human Trafficking Policy applies to all Tennant employees, directors, officers, and employees of Tennant's subsidiaries; and applies equally to Tennant's agents, distributors, and suppliers worldwide. These policies detail Tennant's prohibition against human trafficking. We are committed to using effective systems and controls to prevent human trafficking from taking place anywhere within our business or supply chain. During the statement year, we did not identify any human trafficking in our activities or supply chain.

We have one Code of Conduct that applies to our employees globally and recognizes Tennant's commitment to business integrity and the right of Tennant workers to have a respectful work environment. Available in 15 languages, our Code of Conduct sets clear expectations for employees, officers, directors, and non-employee third parties who act on Tennant's behalf. It summarizes Tennant's compliance principles and raises awareness about how to do business the right way, at all times, and at every site. This extends to complying with laws regarding slavery or human trafficking in the countries in which we do business. Tennant's Code of Conduct and underlying policies also require Tennant employees to select and retain suppliers and contractors who comply with all applicable laws and regulations and align with Tennant values in the areas of human rights, business integrity, environmental compliance, and employee health, and safety (EHS).

- **Child labor and minimum hiring age**



Tennant does not tolerate child labor (as defined under applicable laws). This commitment is set forth in our Global Human Rights Policy. During the statement year, we did not identify any child labor in our activities or supply chain.

- **Forced and compulsory labor**

Tennant complies with all applicable laws and employment regulations and does not engage or participate in forced labor. This commitment is evident in our Global Human Rights Policy, Anti-Human Trafficking Policy, and Supplier Core Expectations Policy. Tennant also does not permit the practice of having employees pay recruitment fees or other related fees in order to obtain employment. Across Tennant, leaders in trade compliance, product regulatory, human resources, ethics and compliance, monitor human rights risks, trade laws, and related regulations. As we become aware of potential risks from specific regions or countries, we will review our relationships and businesses to determine appropriate actions. During the statement year, we did not identify any forced labor or compulsory labor in our activities or supply chain.

- **Supplier Core Expectations**

Our supply chain plays a vital role in our Sustainability and Environmental and Social Governance (ESG) objectives, and we value the partnership with our suppliers in achieving them. A fundamental concept within our “Thriving People” pillar is ensuring we positively affect the lives of those we engage with, both internally and externally, including our supply chain. At Tennant, we set a high bar for environmental and social governance, and we expect the same from our suppliers. We expect our suppliers and their subcontractors to comply with all applicable laws and regulations and maintain just and decent working conditions, as outlined in our Code of Conduct and Global Human Rights Policy. Our Supplier Core Expectations outlines our zero-tolerance policy relating to forced labor, human trafficking, child labor, and discrimination. It promotes reasonable working conditions and wages, anti-corruption, compliance, and reporting. The Supplier Core Expectations Policy is based on Tennant’s corporate values for sustainable and responsible operations and aligns with the Ten Principles of the United Nations Global Compact, in which we participate.

The Tennant Supplier Core Expectations Policy, available in 15 languages, outlines our basic expectations for suppliers and their subcontractors in the areas of labor and human rights, health and safety, sustainability and environment, ethics and anti-corruption, and management systems. Under the Supplier Core Expectations Policy, Tennant direct material suppliers are expected to comply with all local country labor, human resource, and environmental laws. The Supplier Core Expectations Policy prohibits suppliers from using forced, bonded (including debt bondage) or indentured labor, military labor, involuntary or exploitative prison labor, trafficked or slave labor. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. The Policy prohibits unreasonable restrictions on workers’ freedom of movement in the facility, and any unreasonable restrictions on entering or exiting company-provided facilities. The Policy sets forth expectations in the areas of working hours, wages and benefits; non-discrimination / non-harassment / humane treatment; freedom of association; and collective bargaining.

In addition to full compliance with all applicable labor and human resource laws, we expect our suppliers to be committed to upholding the human rights of workers, and treating them with dignity and respect, as understood by the international community. This applies to all workers, including temporary, migrant, student, contract, direct employees, and any other type of worker. Tennant expects its suppliers to have similar policies and practices that align with the Tennant Supplier Core Expectations Policy, including due diligence with their suppliers.



All suppliers are also subject to our Supplier Manual, which includes all specific compliance and declaration requirements, along with guidance for operating within Tennant's Quality Management system. Additionally, Tennant is a signatory of the United Nations Global Compact, demonstrating our support and efforts to align our strategies and operations with universal principles on human rights, labor, environment, and anti-corruption and take actions that advance societal goals.

### **Training**

Tennant's Ethics & Corporate Compliance department administers a comprehensive online compliance training program to employees worldwide in 15 languages. Tennant mandates annual training globally on its Code of Conduct that includes specific training regarding human trafficking and forced labor. Tennant trains employees and distributors to communicate and reinforce the expectation and requirement that they will comply with the law, Tennant's Code of Conduct, and supporting policies, standards, and procedures, including those related to human rights.

Tennant also provides annual on-line training to employees globally that includes content about respectful work environment, anti-discrimination and harassment, and human rights.

### **Risk Identification, Assessment and Remediation**

#### **Ethics Hotline**

Tennant's ethics hotline, EthicsPoint, found at [TennantEthics.com](http://TennantEthics.com) is a 24-hour confidential online reporting system. Reporters can choose to submit their concern anonymously in most countries (where allowed). It is managed by a third-party vendor and is available to Tennant employees and others internally and externally. The system does not trace phone calls or use caller identification, nor does it generate or maintain internal connection logs containing internet protocol (IP) addresses. Web-based reports are made through a secure internet portal that does not trace or show user screen names.

The Ethics & Corporate Compliance Department is responsible for reviewing every reported business conduct concern, including anything related to allegations of human rights, modern slavery, or forced labor violations, and deciding which require an investigation. If an investigation is needed, we assign an appropriate investigative resource. Substantiated violations may result in disciplinary actions. Discipline may take many forms, from warnings to suspensions to termination, and may impact one or more persons associated with the violation. Ethics & Corporate Compliance provides information regarding ethics reports and investigations to the Audit Committee of the Board of Directors on a quarterly basis.

Tennant Corporate Audit periodically audits our human resource practices for employees and non-employees to assure compliance with Tennant guidelines and external regulations (for hiring, timekeeping, payroll, benefits, etc.). It also promotes ethical business practices and investigates ethics-related concerns.

#### **Risk Assessment**

The overall objective of risk management is to support the realization of Tennant's strategy and support our operational and financial objectives, ensuring that risks are properly identified and mitigated. We use an integrated risk management framework to identify, assess, manage, monitor, and communicate risks across





the Company. Tennant reports on the top ten identified risks in its annual report, but to date Human Rights-related risks have not been ranked in the top ten reported risks.

### **Direct Suppliers**

Our direct material suppliers are subject to our Supplier Core Expectations (i.e., our supplier code of conduct), which include human rights and are publicly available on our website. 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.

Tennant is concerned with potential links between the illegal extraction and trade of natural resources, human rights violations, conflict, and environmental degradation. As such, Tennant has established a due diligence and management system for conflict minerals. Tennant uses a third-party service provider to support our Conflict Minerals Program, which includes assessing and responding to the risks identified in the supply chain. One aspect of this assessment is to evaluate supply chain information, identify potential risks, and develop and implement additional due diligence steps that the Company will undertake with suppliers regarding conflict minerals.

### **Tennant's Ongoing Commitment**

Tennant is committed to measuring and continually improving the effectiveness of our due diligence program regarding modern slavery and human trafficking. We will continue to:

- Identify ways to improve employee and supplier awareness of Tennant's efforts to prevent modern slavery and human trafficking within our supply chain.

- Monitor global risks of slavery and human trafficking.

- Focus resources on internal and external operations with the highest risk of potential human rights violations.

- Develop and improve Tennant's due diligence management system, to help identify and address human rights issues within current and prospective suppliers and other third-party business partners.

- Comply with internationally accepted frameworks such as the United Nations Guiding Principles.

- Strengthen contracts, auditing capabilities and enforcement mechanisms to prohibit suppliers from providing products or services to Tennant that use labor resulting from mental or physical coercion, physical punishment, slavery, human trafficking, or other oppressive labor conditions.



This Global Modern Slavery and Human Trafficking Transparency statement has been reviewed and approved by the Board of Directors on February 11, 2025.

Signed:

A handwritten signature in black ink, appearing to read "David W. Huml", written over a horizontal line.

David W. Huml  
President and Chief Executive Officer

Dated: 3/12/25

Appendix A

Index for Australian Modern Slavery Act 2018

Criterion #	Requirement description	Location in Tennant Modern Slavery Statement
1	Identify reporting entity	Page 1
2	Structure, operations and supply chain	Page 1-2
3	Risks of modern slavery practices in the operations and supply chain of the reporting entity, and any entities that the reporting entity owns or controls	Pages 5-6. Tennant has reviewed its supply chain and identified its largest risk as conflict minerals.
4	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Pages 2-6
5	Describe how the reporting entity assesses the effectiveness of such actions	Page 5
6	Describe the process of consultation with entities that the reporting entity owns or controls	Page 2
7	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	

This report has been reviewed and approved by the governing body of Tennant's subsidiary in Australia. I attest that I have reviewed the information contained in the report for Tennant Australia Pty Limited. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Australia Modern Slavery Act of 2018 for the reporting year listed above.

Full name: Chuck Levene

Title: Vice President Global Supply Chain

Date: 17Mar25

Signature: Chuck Levene I have the authority to bind Tennant Australia Pty Limited



## Appendix B

### Index for UK Modern Slavery Act

Criterion #	Requirement description	Location in Tennant Modern Slavery Statement
1	Organisation's structure, its business, and its supply chains	Page 1-2
2	Policies in relation to slavery and human trafficking	Pages 3-4
3	Due diligence processes in relation to slavery and human trafficking in its business and supply chain	Page 5-6
4	The parts of its business and supply chain where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	Pages 5-6
5	Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chain, measured against such performance indicators as it considers appropriate.	Pages 5-6
6	The training and capacity building about slavery and human trafficking available to its staff.	Page 5

This report has been reviewed and approved by the governing bodies of Tennant subsidiaries in the United Kingdom. I attest that I have reviewed the information contained in the report for the entities listed below. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the UK Modern Slavery Act of 2015 for the reporting year listed above.

Full name: Chuck Levene

Title: Vice President Global Supply Chain

Date: 17Mar25

Signature: Chuck Levene. I have the authority to bind the following subsidiary companies: Vaclensa Limited, Nobles Floor Machines Limited, Tennant UK Limited, Walter Broadley Limited, Walter-Broadley Machines Limited



Appendix C

Index for Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act

Criterion #	Requirement description	Location in Tennant Modern Slavery Statement
1	A description of the steps taken to prevent and reduce risks of forced labour and child labour, as per subsection 11(1)	Page 2-6
	Supplementary information addressing each of the seven requirements in subsection 11(3)	
2	(a): The entity's structure, activities and supply chains	Pages 1-2
3	(b): Policies and due diligence processes in relation to forced labour and child labour	Pages 3-5
4	(c): The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk	Pages 5-6
5	(d): Any measures taken to remediate any forced labour or child labour	Forced labour has not been identified
6	(e): Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains	Forced labour has not been identified
	(f): The training provided to employees on forced labour and child labour	Page 5
	(g): How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains	Page 5-6

This report has been reviewed and approved by the governing body of Tennant Canada. In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Tennant Sales & Service ULC. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Canadian Act, for the reporting year listed above.

Full name: Chuck Levene

Title: Vice President Global Supply Chain

Date: 17Mar25

Signature: Chuck Levene I have the authority to bind Tennant Sales & Service ULC.



Appendix D

California Transparency in Supply Chains Act

Criterion #	Requirement description	Location in Tennant Modern Slavery Statement
	<b>State to what extent manufacturer does the following:</b>	
1	Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party.	Page 6 Tennant reserves the right to require suppliers to verify compliance with Tennant's expectations and to correct any non-compliance. Tennant has not required verification but is working to implement this process.
2	Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.	Tennant currently does not currently conduct audits of suppliers.
3	Requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.	Pages 4-6
4	Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.	Pages 2-5
5	Provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.	Page 5

This report has been reviewed and approved by Tennant's Board of Directors. I attest that I have reviewed the information contained in the report for Tennant Company. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the California Transparency in Supply Chains Act for the reporting year listed above.

Full name: Chuck Levene

Title: Vice President Global Supply Chain

Date: 17Mar25

Signature: Chuck Levene. I have the authority to bind Tennant Company