



# Whistleblower Policy

**Tennant Company values integrity and expects all employees, vendors, distributors, suppliers, contractors, and other partners of Tennant to act legally, ethically, professionally, and with integrity in carrying out their duties and responsibilities. The purpose of this Policy is to reinforce the business integrity of the Company by providing a safe and reliable means for employees and others to report concerns they may have about conduct at Tennant. It is the responsibility of all employees to report concerns about violations or suspected violations of the law or regulations that govern Tennant Company's operations. You can raise concerns, confidentially and anonymously if desired, and free of any retaliation, discrimination, or harassment.**

This policy applies to all employees of Tennant and third parties doing business with Tennant globally.

## Policy

Whether you are an employee or someone who does business with us, we ask that you report good faith concerns regarding Tennant's business practices as described below.

### 1. Covered Reports

The following are the types of suspected conduct appropriate for reporting under this policy ("Covered Reports"):

- 1.1 Suspected violations of our Code of Conduct or conduct which could impact Tennant's commitment to **Business Integrity**. Examples of such violations include conflicts of interest; antitrust violations; issues impacting free and fair competition; bribery and corruption; violations of regulations governing global trade or supply chain; prohibited political activity; violations of human rights or forced labor regulations; and issues of product quality and safety.
- 1.2 Suspected **Financial Violations**, including accounting or audit irregularities; embezzlement; insider trading; money laundering; fraud or theft; misuse or misappropriation of assets; or any other auditing or financial matters.



- 1.3 Suspected violations of Tennant's **Employment Or Workplace Conduct Policies**, which can include allegations of harassment or discrimination; retaliation; drugs or alcohol use; compensation and benefits; workplace civility; or other Human Resources issues.
- 1.4 Suspected **Environment, Health and Safety Violations**, which can include threats of violence; possession of weapons; activity causing environmental harm; violations of environmental regulations; and violations impacting workplace safety or health.
- 1.5 Suspected violations of Tennant's **Information Systems and Data Management** policies, including infringement on intellectual property; violations of data privacy and protection policies or regulations; violations of information systems and network security policies; and disclosure of Company confidential or proprietary information.

## 2. Good Faith Reporting

All reports under this Policy must be made "in good faith," meaning for the purpose of protecting and promoting the ethics and integrity of the Company. Grievances of a personal nature will not generally be considered protected reports under this Policy unless they relate to a suspected or intended violation of law or Company policies or procedures.

Reports containing information that the reporter knows to be false or unreliable are not good faith reports under this Policy. A party who knowingly and intentionally files a false report or provides false or deliberately misleading information in connection with an investigation of a report may face disciplinary action, up to and including termination of employment or other legal proceedings.

It is the responsibility of all Tennant Company employees to comply with all applicable laws and regulations and to report violations or suspected violations in accordance with this Whistleblower Policy. Employees are encouraged to ask questions if they are unsure about how to proceed or whether conduct violates the applicable law or regulation or Tennant Company's policies, including but not limited to its Code of Conduct.

Employees should always provide truthful information in connection with an inquiry or investigation by a court, an agency, law enforcement, or any other governmental body.

## 3. Reporting Complaints



Tennant provides multiple avenues for reporting suspected violations of law, policy, or unethical conduct.

### 3.1 Manager or Supervisor

Tennant has an open door policy and encourages employees to share their questions, concerns, suggestions or complaints with their supervisor or manager, if appropriate. Supervisors and managers are then required to report suspected violations of local, state, or federal law or Tennant Company's policies to Ethics and Corporate Compliance, which is responsible for investigating reported ethics violations.

### 3.2 Human Resources, Ethics and Corporate Compliance, Legal

If an employee is not comfortable speaking with their supervisor/manager or is not satisfied with the supervisor/manager's response, the employee is encouraged to speak with another member of management, your Human Resources representative, the Ethics and Corporate Compliance group, or an attorney in the Legal Department. Human Resources representatives are required to report suspected violations of local, state, or federal law or Tennant Company's policies to Ethics and Corporate Compliance, which is responsible for investigating reported ethics violations.

Ethics & Corporate Compliance can be reached by email at [CorpCompliance@tennantco.com](mailto:CorpCompliance@tennantco.com) or mail at Tennant Company, 10400 Clean Street, Eden Prairie, Minnesota 55344, Attn: Global Compliance Counsel.

### 3.3 EthicsPoint

Reports may also be submitted via Tennant Company's Ethics Hotline, EthicsPoint. Tennant EthicsPoint is a comprehensive and confidential reporting tool created by Navex and provides the ability to make reports through the following methods:

1. Web portal accessible from desktop or mobile device at web address [tennant.ethicspoint.com](http://tennant.ethicspoint.com);
2. Dedicated phone number available 365 days a year, 24 hours a day: **1-877-774-6504**;

**EthicsPoint hotline provides the Whistleblower the option of indicating his or her identity or leaving it anonymous (where applicable laws allow).**



To support the investigation and to facilitate an appropriate response, reports should include a precise description of the facts (including dates and location), the persons involved in the violation, and identification of those who can provide information and supporting documentation.

Receipt of the report will be acknowledged to the sender within a reasonable period following receipt if the sender supplied an address for response.

### 3.4 Reporting to Law Enforcement.

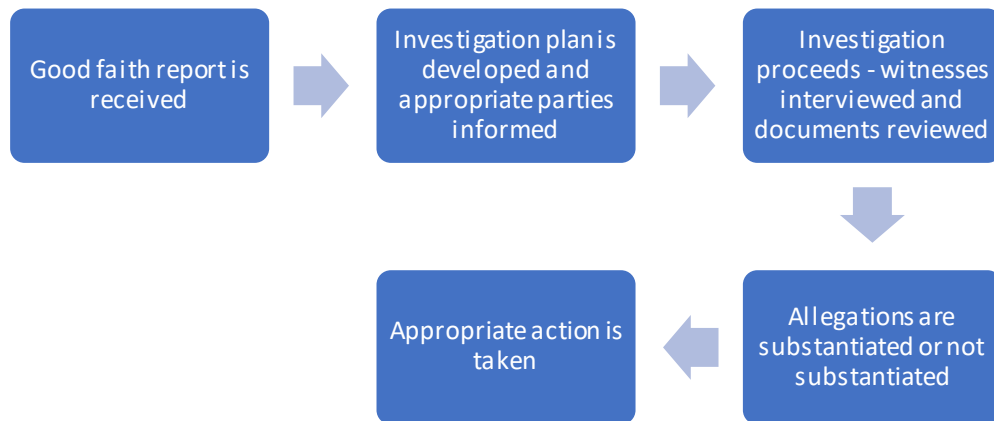
This Policy provides a mechanism to make Tennant aware of alleged wrongdoing so the Company can address the issue as soon as possible. However, nothing in this Policy is intended to prevent any employee from reporting information to federal or state law enforcement agencies when an employee has reasonable cause to believe that a violation of a federal or state statute has occurred. A report to law enforcement, regulatory, or administrative agencies may be made instead of, or in addition to, a report directly to Tennant through the ethics or reporting hotline or any other reporting method specified in this Policy.

No employee will be subject to liability or retaliation for disclosing a trade secret if it is done in compliance with 18 U.S.C. §1833 and is made either:

- In confidence to a federal, state, or local government official or to an attorney solely for the purpose of making a report in compliance with this Policy or participating in any investigation relating to an alleged Violation or Fraudulent Auditing and Accounting Activity; or
- In a complaint or other document filed in a lawsuit or other proceeding under seal.

## 4. After the Report

Reports of suspected violations that are submitted by any means specified in this Policy will be handled as follows:



For confidentiality reasons, the Company may or may not be able to inform the reporter of the outcome of the investigation or actions taken.

## 5. Confidentiality

Information reported and disclosed during the course of the investigation will, to the extent practical and appropriate, remain confidential except as may be reasonably necessary under the circumstances to facilitate the investigation, take remedial action, or comply with applicable law.

Nothing in this Policy in any way prohibits or is intended to restrict or impede employees from discussing the terms and conditions of their employment with co-workers or exercising protected rights under Section 7 of the National Labor Relations Act or otherwise disclosing information as permitted by law.

## 6. No Retaliation

Tennant strictly prohibits and does not tolerate unlawful retaliation against any employee for reporting a concern in good faith or participating in an investigation. All forms of unlawful retaliation are prohibited, including any form of adverse action, discipline, threats, or intimidation. Tennant considers retaliation itself a violation which may result in disciplinary action, up to and including termination of employment or any other working relationship with Tennant.

If you have been subject to any conduct that you believe constitutes retaliation for having made a report in compliance with this Policy or for having participated in any investigation, please immediately report the alleged retaliation to Human Resources, Ethics & Corporate Compliance, or an attorney in the Legal Department.



## Exceptions

None

## Definitions

None

## Related Information

Handbook Non-Retaliation Policy

## 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).

## 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 [\*\*corpcompliance@tennantco.com\*\*](mailto:corpcompliance@tennantco.com).

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