# **TENNANT**<sup>®</sup> C O M P A N Y

# OUR CODE OF CONDUCT

# INTEGRITY IN EVERY MOMENT





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# INTRODUCTION

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# CEO LETTER

Dear Colleagues -

Over more than 150 years, Tennant Company has built its reputation as an ethical company. Our customers, employees, and partners have grown to trust that we will conduct business fairly, ethically, and with integrity.

Every day, we have the opportunity, challenge, and responsibility to uphold our well-earned reputation. Doing so requires that we are equipped and prepared to demonstrate integrity in every moment.

As an enterprise with an international presence, we often work in complex, nuanced environments and navigate new situations, events, or circumstances that can raise regulatory or reputational risks. In such environments, our Code of Conduct is a valuable resource.



While no single document can provide all the answers, our Code and the underlying policies provide a foundation to guide our decisions and behaviors in our global business. Make sure you read and understand this guidance, as it outlines expectations that apply to us all.

If you find yourself facing a difficult situation or are unsure about the right decision, our Ethics & Corporate Compliance team can assist. And if you know about or suspect wrongdoing, let us know right away, using one of the channels listed in the Resources section of our Code.

I am counting on you to protect and extend our reputation by living our values, committing to Tennant Company's high ethical standards and striving to do what's right because it's the right thing to do.

We are a family of brands that serve different customers, but our collective commitment to demonstrating integrity remains consistent across our business. Our standards apply to us all no matter the country, region, product line, or role in which we work.

I am proud of the work we do together to make the world a cleaner, safer, healthier place.

Danie W. Hund

**Dave Huml** President and Chief Executive Officer

While no single document can provide all the answers, our Code and the underlying policies provide a foundation to guide our decisions and behaviors in our global business.



# Message from the Ethics & Corporate Compliance team

#### Dear Colleagues —

At Tennant Company, integrity and compliance are not separate from the business — they are how we do business. Focusing on and enhancing our ethical culture is everyone's responsibility. This work is never complete — it is an ongoing process that continually evolves.

As a group, we aim to support you by providing tools to drive "Integrity in Every Moment" while safeguarding Tennant Company's reputation and mitigating risk.

Our Code of Conduct is the foundational tool that all of us can use to guide our decision-making at work.

In this Code, you'll find specific guidance on a number of topics that can have ethical and legal implications. You'll also find direction on where you can turn if you have additional questions or need further resources.

Acting with integrity means raising questions or concerns — speaking up if something doesn't seem right. We are committed to creating an environment that welcomes open communication and supports you in this process. We are listening and we are here to help.

No matter your role with Tennant Company, we share our business goals, along with our ultimate goal of building a cleaner, safer, and healthier world. Thank you for your dedication to Tennant Company and your commitment to upholding the standards set forth in our Code.

Warmest regards,

Notin Crickson

Kristin Erickson SVP, General Counsel, Corporate Secretary & Chief Compliance Officer

Lesli Wieczorek Principal Compliance Specialist



Our Code of Conduct is the foundational tool that all of us can use to guide our decision-making at work.



# Integrity in Every Moment

By joining Tennant Company, we have each made a commitment to operate ethically and to lead with integrity. Every day provides new opportunities to do the right thing. We act with integrity in the way we interact with our customers, our partners, and one another.

The daily actions of every Tennant Company employee define who we are as a company. Each of us has a responsibility to comply with the Code of Conduct and related polices — incorporating them into each decision we make.

# What We Expect

The expectation is that we each act with integrity, are honest and forthcoming, treat people with respect, follow the law and our policies, and stand up for what is right — embedding integrity in everything we do. Our Code applies to all of us, including employees, officers, and members of our board of directors. We also expect all individuals and organizations that partner with Tennant Company or do business on our behalf to act in accordance with our values and our commitment to integrity.

Acting with integrity in every moment may not always be easy. While some situations are clear, others can be less obvious. That's where our Code, policies, and your good judgment come in. When the right answer isn't clear, these are resources you can turn to for direction and clarity — including the Ethics & Corporate Compliance team.

While no Code or policy can provide all the answers, let this Code of Conduct help guide your judgment, and ask questions when you need clarification.

Our business has changed over time, as have the environments in which we operate, how we interact with and serve our customers, and the laws that govern our actions and our industry's standards.

Legal and regulatory mandates are a baseline for minimum organizational compliance. Tennant Company goes beyond this to foster a culture of ethics and compliance in which Tennant Company not only complies but thrives.





# KNOW IT, SHOW IT, GROW IT

Built into our Code are concepts that help us educate the enterprise on our standards and expectations, embed desired behaviors into how we accomplish our goals through integrity-based decision making, and enhance our culture of ethics. We refer to these concepts as Know It – Show It – Grow It. How do we demonstrate Integrity in Every Moment? We:



### Know It

We understand what's expected and what Tennant Company stands for. We are familiar with the Code guidance and related policies and procedures. We can handle situations with confidence, knowing what's right.



### Show It

We turn knowledge into action by consistently demonstrating ethical behaviors. Our commitment to integrity is reflected in the way we accomplish our daily responsibilities. Through our behavior, we further Tennant Company's reputation as an ethical company.



# Grow It

We contribute to a larger global vision, one that builds on our stewardship legacy. We take action to leave things better than we found them. We stay current with the changing landscape of risks, regulatory demands, and company policies, particularly those that are applicable to our specific role, location, and function.







# We create a cleaner, safer, healthier world by:



How we treat people



How we build business relationships



How we act responsibly and professionally



How we communicate accurately and honestly



How we enhance our communities





# HOW WE TREAT PEOPLE



# **Respectful Treatment**



#### **KNOW IT**

We all contribute to making Tennant Company a workplace where everyone is treated with dignity and respect.

When we show true respect for each other, it reduces stress and conflict and increases productivity and collaboration. We can be happy with the work we do and feel proud of what we have accomplished each day.

Harassment, bullying, discrimination, threats, and other disrespectful behavior do not support our culture and have no place in our organization.

For more guidance, review your local employee handbook and Human Resources (HR) policies.



#### SHOW IT

- Always be respectful and professional.
- Listen to what others have to say and practice common courtesy and politeness.
- Make employment-related decisions based on an individual's qualifications and experience and not on characteristics such as race, gender, gender identity, disability, age, or other protected characteristics.
- Watch for bullying or intimidating behavior. If you witness inappropriate behavior and it is safe and appropriate, intervene; if not, report the situation so the company can assist in resolving it. See the anti-retaliation section of the Code for more guidance.





# Diversity, Equity, and Inclusion



#### **KNOW IT**

Employee success is a key part of building an organization where everyone can thrive. Additionally, organizations that cultivate diverse and inclusive environments generally report better outcomes as a company. We act in ways that promote the health, safety, well-being, and development of all our employees. We continually work together to promote and advance our diversity, equity, and inclusion (DEI) efforts throughout the company.

- **Diversity**: Recognizing that difference matters. The unique characteristics, perspectives, life experiences, and identities that define us as individuals and differentiate us from each other.
- Equity: The fair treatment and access to resources and opportunities to ensure all employees can thrive, acknowledging that people have unique needs. This includes efforts to identify and remove barriers that have prevented the full participation by everyone.
- **Inclusion:** Leveraging the power of difference. Creating an environment where all individuals contribute, have a sense of belonging, and feel valued, respected, and supported to reach their full potential.

For more guidance, review our DE&I initiative, your local employee handbook, and HR policies.



#### SHOW IT

Integrity in every moment:

- Be intentional about contributing to a safe, welcoming community that values people of all backgrounds and identities.
- Remain alert to unconscious bias or tendency to stereotype others.
- Value the differences you see in others and be open to a variety of life experiences, identities, and points of view.
- Act inclusively toward others and never intentionally exclude others from normal workplace interactions or conversations.
- As an interviewer, be open to diverse candidates from a range of backgrounds and identities.
- Take accountability of your own actions, point out when others are being offensive, and speak up if you believe someone is uncomfortable.

The diversity and strength of our global, regional, and local teams drive the success of our business. Our goal of building a vibrant, inclusive workplace community is supported by our Employee Resource Groups (ERGs). We encourage everyone to participate in our ERGs and form new ERGs, where appropriate.



## Health and Safety



#### **KNOW IT**

We promote a healthy and safe environment for all of our stakeholders, including our employees, customers, and others who come into contact with our products. We follow all occupational health and safety laws that apply to our work and locations.

It's our goal to have an injury-free workplace — from our manufacturing facilities to office environments. For more information, refer to local Employee Health and Safety policies.

Product safety is a critical part of our product design process. We take steps to protect safety for those who encounter our products or operations, including when our products are designed, manufactured, transported, distributed, used, and serviced.



#### SHOW IT

Integrity in every moment:

- Take personal responsibility for following our safety rules and policies. If you don't know something, ask. If you don't remember something, find out.
- Watch for and report any workplace hazards, injuries, or unsafe behavior.
- Immediately report any violence or threats of violence.
- Wear required personal protective equipment, such as safety glasses, approved work shoes, and ear protection in production areas.
- Properly secure, transport, and dispose of hazardous materials.
- Follow procedures and operational sequences to keep ourselves safe and not hurt others.

Health and safety go beyond the specific points listed above. Nothing is more important than the wellbeing of our employees and customers, and we are all responsible for honoring our commitment to safety.





# Privacy



#### KNOW IT

Everyone at Tennant Company is responsible for protecting the data we collect, access, use, or store. Privacy laws require this in many places where we work. It's also the right thing to do.

Be alert any time you're working with any data that can identify an individual — whether it's submitted by customers, shared by employees, or collected on our machines.

Obvious examples of sensitive or private data include names, addresses, photographs, credit card numbers, email addresses, phone numbers, and tax IDs and other identification numbers.

But private data can also include a wide array of less-obvious types of information, from internet service provider (ISP) addresses to cookies collected via our website — even stored global positioning system data.

Follow our privacy policies and these basic principles:

- Know the requirements that apply, based on where you are located and whose data you are working with.
- Where applicable, inform people when you are collecting their data, being specific about which data will be collected and for what purpose. You may be required to allow them to opt out, or honor requests to delete personal data.
- Obtain explicit consent any time you collect sensitive data and work to minimize the amount you need.
- Limit the data collected to that which is required or needed; do not collect more data than is required.
- Use sensitive data only for the original purposes provided.
- Always follow our policies related to storing sensitive data, including through appropriate access restrictions.
- Destroy data in a timely and appropriate manner in accordance with Tennant Company's data classifications and record retention schedule, subject to any legal holds.



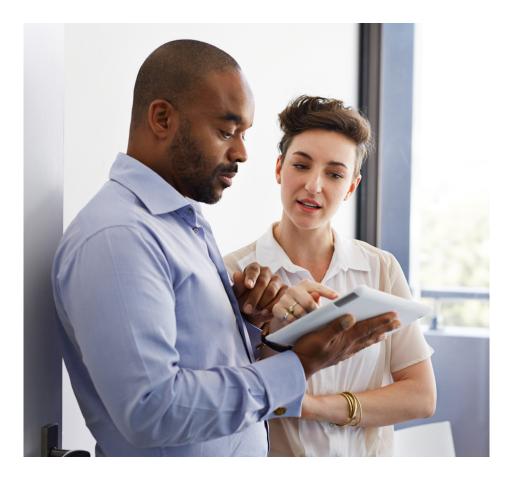


## Privacy



#### SHOW IT

- Be alert to situations where you are working with sensitive data these can arise without warning.
- Use data only for the specific reasons provided at collection, as this is all you have consent for.
- Avoid collecting or using sensitive information that can identify specific individuals. If you believe there is a valid business reason to obtain or use this information, consult with the Legal Department first.







# Human Rights



#### **KNOW IT**

Our business operates in more than 100 countries worldwide, and we take our role as a global corporate citizen seriously.

Tennant Company is a signatory to the United Nations Global Compact, a voluntary initiative to implement universal sustainability principles and support and champion human rights.

Several Global Compact principles focus on human rights and include:

- Supporting and respecting the protection of internationally proclaimed human rights
- Taking measures so we are not complicit in human rights abuses, such as forced labor, child labor, and discrimination
- · Undertaking initiatives which work against corruption in all of its forms

Putting this into practice means we:

- · Clearly outline our expectations and standards for our employees, vendors, and other third parties
- Conduct due diligence to carefully select suppliers, distributors, intermediaries, agents, vendors, and other business partners
- Address any abuses we encounter

In our commitment to human rights, we work to respect local customs and practices while requiring adherence with the law and our expectations.

See our Human Rights Policy and other policies related to vendor expectations for more information.





# Human Rights



#### SHOW IT

- Foster and maintain ethical work environments free from discrimination.
- Strive to hold third parties with which we do business accountable for complying with applicable laws and Tennant Company standards.
- Strive to select third parties who share our commitment to human rights, anti-corruption, transparency, product standards, and environmental protection.
- Report any suspicion of modern slavery and human trafficking in our supply chain.







# HOW WE TREAT PEOPLE: GROW IT



We build the future of our company every day.

Creating a safe, positive, compliant, and inclusive work environment is essential for the well-being and success of our team members. Through training, awareness campaigns, regular evaluations, and ongoing dialogue with our employees and stakeholders, we can be a place where perspectives are respectfully shared and heard, where human dignity is valued, and where everyone can do their best work and achieve their full potential.

Through our actions, we can create an ethical culture of learning, growing, and adapting to meet the changing needs of our employees and the broader society. We recognize that our success depends on the well-being and happiness of our employees and those around us, and we will remain steadfast in our dedication to upholding these principles.

Creating a safe, positive, compliant, and inclusive work environment is essential for the well-being and success of our team members.





# HOW WE BUILD BUSINESS RELATIONSHIPS



# Anti-Bribery and Anti-Corruption



#### **KNOW IT**

At Tennant Company, we are committed to honesty, integrity, and fair dealing in our business relationships. We prohibit all forms of bribery and corruption everywhere we operate.

Anti-bribery and anti-corruption laws make it illegal to offer, promise, give, solicit, or receive "anything of value" in exchange for an "improper advantage." This covers a wide variety of dishonest behaviors. For example, this could include both making small payments that facilitate routine transactions or making large payments (bribes) and kickbacks used to gain a competitive advantage. If given with the goal of receiving an improper or unfair advantage, bribery could also involve:

- Discounts or refunds
- Charitable contributions
- Gifts and/or entertainment
- Job offers
- Use of Tennant Company resources

We comply with the U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and similar laws everywhere we operate. We thoughtfully approach interactions with government officials and hold our third parties and business partners to the same standard.

For more guidance, review our anti-bribery and anti-corruption, conflicts of interest, and gifts, hospitality, and entertainment policies.





# Anti-Bribery and Anti-Corruption



#### SHOW IT

- Be alert to geographic regions and industries where there is an increased risk for bribery. Know how to operate and what to watch for.
- Ask for help from the resources listed in this document and review our policies if you are asked for a bribe or it becomes clear that one is expected.
- Make integrity-based decisions consistent with the Code and our policies that keep you safe when navigating interactions that pose a potential risk.
- Be aware of cultural expectations about gift giving related to holidays, funerals, weddings, or similar occasions. These can raise bribery concerns when connected to business relationships and need to be carefully navigated.
- Know how to recognize a government official. In some cases, such as elected officials, their status will be obvious. However, in countries where many entities are government-owned, this will be less clear even executives of some private companies may be included in this category.
- Make our anti-corruption and anti-bribery expectations clear to third parties you work with or manage. Remain closely involved and keep alert for any warning signs and bribery risks.





# **Government Contracting**



#### **KNOW IT**

When conducting business with the government, there are strict rules we need to follow. These rules allow for proper competition and appropriate use of government funds, and they help maintain a healthy economy. Failing to follow these rules could have significant consequences for our business.

We conduct business with the government in a fair and honest manner and do not seek favors.

For more guidance, review our anti-bribery and anti-corruption, conflicts of interest, gifts, hospitality, and entertainment policies (for government and non-governmental entities).



#### SHOW IT

- Provide truthful, current, complete, and accurate information when making submissions, certifications, or representations — including in proposals and pricing, invoices, or sourcing documents.
- Follow proper procedures when recording government contracts and calculating payments to government entities.
- Do not provide anything of value to government officials, including meals, drinks, travel, or lodging expenses.
- Never promise or discuss employment or business opportunities with government employees as this can create a conflict of interest.





# **Political Activities & Lobbying**



#### **KNOW IT**

Tennant Company supports our employees participating in the communities in which we live. This includes supporting participation in the political process. However, as an organization, Tennant Company does not directly support political parties or candidates for public office, nor does Tennant Company reimburse employees for political contributions. That is why it is important to draw clear lines between our personal political activities and the work we do at Tennant Company.

Additionally, while lobbying is an appropriate business activity, unless authorized by the Legal Department, we should not attempt to influence elected government officials to make decisions in favor of Tennant Company.

For more guidance, review our Political Contributions and Public Policy Activities, Anti-Corruption and Anti-Bribery, Conflicts of Interest, and Gifts, Hospitality and Entertainment policies.



#### SHOW IT

Integrity in every moment:

- Keep your personal political activities separate from your work at Tennant Company.
- Be clear that your personal views are your own beliefs and not those of the organization.
- Use personal resources not company time, materials, funds, technology, or other resources to support your personal political interests.
- Follow our disclosure rules if you are running for (or considering running for) public office or appointed to a political position. Refer to the Conflicts of Interest section of the Code and our Conflicts of Interest policy for more details.

While we support employees' rights to engage in political activities outside of work, we strongly believe in keeping our workplace politically neutral and focused on our shared goals. We aim to create an environment where all employees feel comfortable and respected, regardless of their political beliefs. At work and on company property, we respect and protect employee's rights to promote or support individual political candidates, parties, or positions unless and until it becomes disruptive to our operation and a distraction from achieving our business objectives.



## **Fair Competition**



#### KNOW IT

At Tennant Company, we want to win on the merits of our people, products, and organization. We compete vigorously while dealing fairly and honestly with our customers, third parties, and competitors. We do not collude or unfairly coordinate with others at the expense of our customers or others.

This means we intentionally avoid practices, agreements, or understandings that could affect price or the assignments of clients or sales territories which could have an anti-competitive effect on customers and/or reduce competition.

We comply with the competition laws of all locations where we operate, including U.S. antitrust law.

For more guidance, review our anti-trust and fair competition policies.



#### SHOW IT

- Recognize the risks of interacting with competitors and demonstrate an understanding of how to handle such situations.
- Before meeting with a competitor, work with the Legal Department to develop an approved agenda and written guidelines.
- Avoid discussions with competitors related to topics including but not limited to:
  - · Pricing and cost
  - Profit margins
  - Customers
  - Sales territories
  - Production levels
  - Product quality
  - Suppliers
  - Competitive intelligence
  - · Terms and conditions of sales
  - Technical, new, and/or innovative ideas





# **Fair Competition**

- Be careful and attentive when attending trade association meetings.
- Contact the Legal Department with questions and especially before engaging in any of the following:
  - Exclusive purchase or sale agreements
  - Bundling of goods or services
  - Technology licensing agreements that restrict the freedom of the parties
  - Selective discounting
  - Distribution or Group Buying arrangements
- Treat suppliers fairly. Do not try to compel a supplier to disclose competitors' pricing or negotiate pricing based on the pricing of a competitor.







## **Trade Controls**



#### KNOW IT

As a global company, Tennant Company takes seriously our obligation to comply with government and global trade controls. Additionally, trade control violations can lead to a loss of trade privileges, making it difficult to do business — so it's important to get this right.

When we move products, parts, or technical information across national boundaries, we must understand and comply with the rules that apply to this work.

For more guidance, review our Global Trade Compliance policies.



#### SHOW IT

- Never export controlled products or parts to prohibited countries or prohibited individuals.
- Engage with the Global Trade Compliance and Ethics & Corporate Compliance teams and follow the established third-party due diligence process *before* negotiating a distributor or sales agent contract or sending any products or parts.
- Adhere to our contractual review protocols to avoid any issues related to anti-boycott laws.
- Prepare and retain all documentation related to international trade in accordance with our document retention schedules.
- Do not engage in any transactions with individuals, companies, entities, or countries subject to trade or economic sanctions.





# HOW WE BUILD BUSINESS RELATIONSHIPS: GROW IT



Tennant Company strives to be an honest, reliable, trustworthy partner. As a global company, we have the ability and obligation to stand against corruption as a way of doing business and to ensure fair dealings. That is part of the reason why Tennant Company is a signatory to the United Nations Global Compact.

All of society benefits when organizations like ours act ethically and responsibly. The way we compete and sell, obtain and service government contracts, and ship products and information across global borders has a direct impact on our communities.

Laws and regulations make a difference — but they require the active participation of businesses like Tennant Company who are committed to supporting responsible practices in every aspect of their operations.

We cannot change the way the world works overnight, but our actions and decisions, when based on integrity, help make a powerful difference.

All of society benefits when organizations like ours act ethically and responsibly.





# ACT RESPONSIBLY AND PROFESSIONALLY



# Conflicts of Interest



#### **KNOW IT**

In our professional capacity, we have an obligation to act in Tennant Company's best interests, free from outside influences or involvements.

Tennant Company promotes active involvement in financial, business, charitable, and diverse undertakings beyond our organization. It is vital for us to acknowledge the possibility of genuine or implicit conflicts of interest arising from our relationships. Many connections possess the potential to create conflicts or give the appearance of conflicts. Disclosing these relationships holds significant importance. Even the appearance of a conflict of interest can create concerns.

If you have a potential conflict, disclose it as soon possible, and work with the Ethics & Corporate Compliance team to mitigate and clear any actual or perceived conflicts.

Conflicts commonly show up in:

- Personal relationships (e.g., hiring a relative or supervising a romantic partner)
- Outside business activities/employment (e.g., consulting for a competitor or company that does business with us)
- Financial interests (e.g., investing directly in a vendor, supplier, customer, or competitor)
- Corporate opportunities (e.g., taking personal advantage of something that could have been a business opportunity for the company)
- Use or misuse of company assets (e.g., using Tennant Company resources for a second job or doing a second job during your workday)
- Unique personal benefits (e.g., discounts or other benefits from competitors, distributors, suppliers, vendors, service providers, or customers that are not available to others)

For more guidance, look to your local employee handbook and our Conflicts of Interest policy.

**Question:** My sister-in-law recently got a new job with a company that sells office supplies. She knows that I am in charge of ordering supplies for our office, so she was excited to tell me about the discounts she could offer us. She guaranteed she would give me her best prices. Is this ok?

**Answer:** It may be acceptable for the organization to use your sister-in-law's company as a supplier, but a few things will need to happen first. Start by disclosing the relationship as a potential conflict of interest. Once the potential conflict is reviewed, there will likely be controls put in place to manage the potential conflict. For example, you'll likely be removed from decisions related to your sister-in-law's company. This way, if your sister-in-law's company is brought on as a supplier, it will be clear that the decision was made based on the merits of the company's offerings and not on your personal relationship.



## **Conflicts of Interest**



#### SHOW IT

Integrity in every moment:

- Stay alert to changes in your life, your work responsibilities, and our business that might raise a potential conflict of interest or compromise your independent judgment at work.
- Disclose potential conflicts as soon as they arise in advance of an issue, if possible.
- Update your conflicts of interest disclosure(s) regularly, as required.
- · Be aware of how a situation can look to others.
- Ask for guidance from the Ethics & Corporate Compliance team or one of the resources identified in our Code.



**Question:** I plan to run for election to my town council. If elected, I would continue working here, as the position does not require a full-time commitment. Is there anything I need to know about before I file the paperwork to run?

**Answer:** Serving in a government position while working at Tennant Company can raise an issue. If you plan to seek election, or if you are appointed to public office, you must (1) follow our conflicts of interest disclosure process so that appropriate steps can be taken and (2) recuse yourself from voting on anything impacting the company. As needed, you can work with the Ethics & Corporate Compliance team to manage the situation.



# Gifts, Hospitality, and Entertainment



#### **KNOW IT**

Building strong professional relationships is a key part of doing business. Often this can include giving and/or receiving gifts, hospitality, and/or entertainment.

Any type of gift, hospitality, or entertainment that we offer or accept must be appropriate, within our established limits, free from conflicts of interest, and in keeping with ethical business practices. Gifts of cash or cash equivalents are never acceptable.

See our policies related to gifts, hospitality and entertainment, and travel for more information (e.g. forms).



#### SHOW IT

Integrity in every moment:

- Offer or accept gifts, entertainment, and hospitality only if they are consistent with our policies.
- Seek guidance if gifts, hospitality, or entertainment make you uncomfortable, seem excessive, or appear to be meant to gain an unfair business advantage.
- Do not offer or accept cash or cash equivalents, including gift cards.
- Refer to the gifts, hospitality, and entertainment policies (for government and non-governmental entities) when considering providing anything of value to government officials, including meals, drinks, travel, or lodging expenses.
- If you are providing gifts, hospitality, or entertainment, ask about the recipient's policies to confirm what you are providing does not violate the recipient's policy.

# Before giving or receiving anything in business, ask:

- Am I confident this would not appear to be a bribe, kickback, or something else illegal or inappropriate?
  - For example, an all-expense paid weekend at a resort as a gift of gratitude for signing a contract
- Does the value seem excessive?
  - For example, tickets to a playoff game
- If this became public, could it damage our reputation?
- Is the recipient a government official?
- Does our policy allow it?
- Does the receiving company's policy allow it?



# **Insider Trading**



#### KNOW IT

The integrity of our financial markets depends on everyone being able to act upon the same information at the same time. In our work, we may have access to material nonpublic ("inside") information about Tennant Company, our competitors, our customers, or our third parties.

Material nonpublic information can be any information that relates to our company's business, including:

- Changes in company leadership
- · Financial projections
- Sales or revenue numbers
- Potential acquisitions or mergers
- · Significant litigation or government investigations
- Trade secrets, including new innovations, products, launches, etc.
- · Security incidents or data breaches

It is against the law to buy or sell securities based on material nonpublic information, also known as "inside information." It is also against the law to provide inside information to others so that they can trade securities based on material nonpublic information, known as "tipping."

Not only are these actions against the law, they are also a violation of our Code and policies.

For more guidance, look to our Insider Trading policy.



#### SHOW IT

- Know how to recognize inside information and do not share it with others.
- Do not tip or trade based on inside information.
- Protect all confidential information, including material nonpublic information, related to Tennant Company, our competitors, our customers, or our third parties.





# Intellectual Property & Confidential Information



#### **KNOW IT**

As an innovative organization, our intellectual property, trade secrets, and other forms of proprietary information, such as product development and enhancements, customer projects, and roadmaps, are critical to our continued success.

The same is true of the organization's confidential information, which provides a significant competitive advantage. We need to protect this information from disclosure and carefully handle and protect information belonging to our customers and third parties.



#### SHOW IT

- Protect confidential information, including intellectual property, at all times.
- Only share confidential information with fellow employees when they have a need to know specific to their job.
- Discuss and share confidential information about third parties carefully and responsibly. This means only sharing it with those inside Tennant Company who have a need to know and those outside Tennant Company with appropriate permission.
- Contact the Legal Department if you believe you need to share confidential information outside of the company. They will work to determine the appropriate and required actions.





# **Company Property & Resources**



#### KNOW IT

We are all responsible for safeguarding Tennant Company's property and resources, including our physical assets, our financial assets, and our technology. We should treat all company assets with care and respect.

Company property and resources include, but are not limited to:

- Computers
- · Company issued devices and equipment
- Furniture
- Supplies
- Intellectual property
- Facilities
- Cars, trucks, service vehicles, fleet

Your time at work is also a valuable asset. Minimize personal use of Tennant Company's assets and do not let that personal use interfere with job responsibilities.

Understand that Tennant Company owns and monitors the systems we use at work and maintains the right to monitor our use of them for the purpose of protecting company compliance, systems, and data.



#### SHOW IT

- Use company assets efficiently and appropriately.
- Do your best to prevent theft, carelessness, and waste of company property and resources.
- Report suspected theft, fraud, or inappropriate use of our assets.





# ACTING RESPONSIBLY AND PROFESSIONALLY: GROW IT



Maintaining Tennant Company's reputation for integrity and safeguarding our assets is key to our business success.

Behaving with professional integrity not only takes practice — it also requires strength of character and self-awareness. It requires a willingness to scrutinize our own actions and to ask: Am I using good judgment? How would someone outside the situation see this? This includes protecting company property and sensitive information.

Getting this right can have a powerful and positive impact on our productivity, performance, and reputation.

Behaving with professional integrity not only takes practice — it also requires strength of character and self-awareness.







# COMMUNICATE ACCURATELY AND HONESTLY



# **Financial Integrity**



#### KNOW IT

Accurate and complete accounting records give our leadership a clear representation of how the business is performing. They support honest and transparent communications with employees, investors, shareholders, and other company stakeholders.

Accurate financial records also help us satisfy our accounting and reporting obligations as a publiclytraded company.

Anyone who reports information to the company — from submitting expense reports to processing supplier invoices — contributes to our company's books and records. We all have an obligation to provide accurate, complete, and honest information on a timely basis.

Fraud happens when someone hides or misstates information to gain a personal benefit or conceals misconduct, such as:

- Spending company funds on personal expenses (obtaining cash advances on a corporate card for personal expenses)
- · Submitting the same expense more than once
- Stealing company time, resources, or other assets
- · Reporting inaccurate or incomplete financial information
- · Approving transactions that lack the proper documentation or approvals
- · Giving or receiving bribes or kickbacks directly, indirectly, or disguised as something else

Fraud can also happen if unintentional misstatements aren't caught or fixed. We should all watch for fraud. If something doesn't feel right, report it immediately.





# **Financial Integrity**



#### SHOW IT

Integrity in every moment:

- Record financial transactions in the correct recording period, capturing accurate and complete details.
- Watch for signs of possible financial manipulation, like failure to obtain a purchase order, transactions without an invoice, inflated invoices, repeated requests to change the account for payments, bank accounts that do not match the name of the intended recipient, or requests for suppliers to postpone invoices so they fall in different reporting or financial periods.
- Follow all internal controls. Never try to circumvent them or pressure someone to make an exception. Follow all appropriate segregations of duties.
- Be honest and forthright in expense reports. Avoid excessive spending and do not claim reimbursement for personal expenses.
- If you have a question about our financial or other company records, speak up. Do not ignore or cover up errors or mistakes.
- Cooperate fully with all audits and investigations. Be honest and provide accurate and complete information.

By actively watching for signs of fraudulent activity, we can contribute to a safer and more transparent environment.





## **Records Management**



#### **KNOW IT**

Our day-to-day work produces many documents and materials. Good records management helps us maintain appropriate, current information while routinely discarding old and out-of-date materials that can create confusion.

We are responsible for creating, handling, and managing company records and materials with care and in a way that supports operational efficiency. Doing this well allows us to plan for the future and respond appropriately to current and past events.

This includes:

- Appropriate records retention: Our company has an obligation to preserve certain official business records. We've documented these in our records retention schedules.
- Timely destruction and appropriate disposal: Maintaining large inventories of working documents is a burden on our systems and it can make it harder to find and locate official records.
- Confidentiality protections: Certain records slated for disposal or destruction will contain information that should not be made public. These should be disposed of in a secure way.
- Protecting our devices: We have a responsibility to protect any devices that connect to our systems and have access to company records.

For more information, see our records management policies and retention schedules.





## **Records Management**



#### SHOW IT

Integrity in every moment:

- Create accurate and complete records, taking care not to omit important information.
- Understand the difference between an official company record and a working document (convenience copy) that does not need to be preserved. If you have questions, ask your manager.
- Know which records need to be kept and for how long. Consult our records retention schedules as needed.
- Keep your own records and working documents organized so it's possible to locate a record if needed. Good indexing and categorization will also make it easier to separate out records that need to be retained from those that require disposal.
- Routinely review your information and documents and delete, destroy, or dispose of those records and convenience copies that are no longer required.
- Cooperate with any legal holds or other company requests to retain records longer than originally specified.

# Records versus convenience copies:

Official business records are considered the official record of Tennant Company and are subject to all applicable record retention policies. Conversely, convenience copies are duplicate records created for convenience or easy reference.

- Official business records may exist in any media format including paper, electronic, digital, audio, video, microfiche, etc. Generally, official business records are originals, not copies.
- Convenience copies are maintained only as long as reasonably necessary (unless subject to a legal hold) and must be appropriately destroyed once they are no longer required.



# **Responsible and Respectful Communication**



#### **KNOW IT**

As an organization, we want to have confidence that our external communications properly reflect our brand image, strategy, marketing messaging, and goals.

Our communications with people and entities outside our organization need to be approached strategically, aligning our public statements with our business interests. This is true whether our audience is our employees, customers, investors and analysts, government agencies, or the public at large.

To achieve these goals, we have designated key people as company spokespersons and only they are authorized to speak publicly on Tennant Company's behalf.



#### SHOW IT

Integrity in every moment:

- Be truthful and accurate any time you talk about Tennant Company and its brands.
- Unless you are an authorized spokesperson, do not speak on behalf of our Company whether online, in letters to the editor, or statements to news media.
- Refer inquiries from the media, investors/analysts, or the public about Tennant Company or our brands to an authorized spokesperson.
- Use external communications, including social media, responsibly. Do not share or post confidential information about Tennant Company or its brands, third parties, clients, or business partners unless authorized by Tennant Company and/or our external stakeholders.

For more information, see our policies related to email and corporate communications, social media, and requests for customer or product information.

Social media can be a great tool to promote Tennant Company and our products. We need to demonstrate good judgment when using social media. Otherwise, it could be harmful to ourselves, our company, or our stakeholders.

When using your personal social media:

- Be clear that your posts represent your personal views and not the views of Tennant Company
- Be aware that your use of social media could reflect on all of us, even if you post content that has nothing to do with Tennant Company or your work for the company



# COMMUNICATING ACCURATELY AND HONESTLY: GROW IT



Our assets are critical to successfully executing our company's mission. Protecting these assets is one of the ways we as individuals help contribute to achieving this mission.

Presenting information reliably and factually helps us run as a more effective business and provides our stakeholders with an accurate picture of who we are and how our business is doing.

Being honest and clear in our communications tells others we are personally and professionally trustworthy. It demonstrates integrity and builds trust in our organization and in one another.

Being honest and clear in our communications tells others we are personally and professionally trustworthy.





# SUSTAINABILITY AND STEWARDSHIP



# Sustainability and ESG (Environment, Social, Governance)



#### **KNOW IT**

At Tennant Company, we know creating a cleaner, safer, healthier world is essential, and we are committed to helping create and inspire a more sustainable world for future generations.



Our sustainability framework, **Thriving People, Healthy Planet**, supports this commitment and recognizes the foundational interconnection between people and planet, because we know our business cannot be successful without a healthy planet or thriving people.

By working towards ambitious commitments together with our stakeholders, we can support the health, safety, well-being, and development of all our employees and stakeholders.

Tennant Company seeks to help people thrive, contribute to a healthier planet, and drive positive change in six impact areas:

#### **Thriving People:**

- Employee Success
- Social Impact
- Shared Spaces

#### Healthy Planet:

- Climate & Energy
- Water & Chemical Use
- Circular Products & Waste

# THRIVING PEOPLE. HEALTHY PLANET.





# Sustainability and ESG (Environment, Social, Governance)



#### SHOW IT

Integrity in every moment:

- Know and understand our sustainability framework, pillars, and impact areas.
- Demonstrate a commitment to sustainability and positive societal impact.
- Enable the ambitions outlined in our framework, through your work and how we show up in our communities, by:
  - Supporting the health, safety, well-being, and development of all our employees and our DE&I journey
  - Assisting Tennant Company in supporting the workers in our supply chain, the operators who use our products, and the local communities where we operate
  - Designing products that are more efficient, require fewer chemicals, use less water, and are more durable
  - Providing services and manufacturing processes that reduce waste and help close the loop on the lifecycle of our products
  - Creating solutions that enable a net-zero journey, and reducing greenhouse gas emission across our value chain (from our suppliers to our products and operations)
- Support the success of our enterprise sustainability commitments and goals.





# Stewardship: Enhancing Our Communities and Philanthropy



#### **KNOW IT**

A good corporate citizen gives back to the global community in meaningful ways. At Tennant Company, corporate giving is driven by our Vision to create a cleaner, safer, healthier world.

Through corporate-directed giving and our foundation, our company proudly supports organizations, programs, and individuals who share this value and commitment. Some examples of our giving programs include:

- Tennant Employee Scholarship Program
- Volunteer Matching Program
- United Way
- Equipment Donations
- Operating Grants
- K-12 School Custodians Recognition Contest
- Other regional volunteer programs and opportunities



#### **SHOW IT**

Integrity in every moment:

- Look for ways you can be active in supporting your own community.
- Participate in donation drives for causes of interest to you.
- Take part in company sponsored volunteer opportunities throughout the year.
- Take advantage of employee gift and volunteer matching (more information can be found on our Tennant Foundation web and hub sites).





# SUSTAINABILITY AND STEWARDSHIP: GROW IT



Our products and the way we create and develop them can truly help create a cleaner, safer, and healthier world. Through our individual actions at work, we contribute to making this world a reality.

This includes supporting the health, safety, and well-being of our employees. By doing this and also championing others in our supply chain and our communities, we are working toward this goal.

Creating safer and more efficient products helps improve the lives of the people we engage with outside of our company and is a part of our mission to reinvent how the world cleans.

Our products and the way we create and develop them can truly help create a cleaner, safer, and healthier world.







# SPEAK UP, TAKE ACTION





# INTEGRITY IN EVERY MOMENT: KNOW IT - SHOW IT - GROW IT

Raising our questions or concerns — especially when something doesn't seem right — is one example of how we can act with integrity. Fostering an environment where everyone feels safe is critical to creating a workplace where everyone is comfortable speaking up.

Tennant Company provides us with many outlets to report our concerns and/or ask for help. Contact any one of the following resources if you have questions or concerns:

- Your direct supervisor or, if the conduct involves your direct supervisor, the next level above your direct supervisor
- Your Human Resources Business Partner, or anyone in HR with whom you're comfortable sharing your concerns
- Tennant Company's Ethics & Corporate Compliance team by email at Ethics@Tennantco.com
- The Tennant Ethics Hotline

You can access the Tennant Ethics Hotline <u>here</u> or by calling the Tennant Ethics Hotline. Click <u>here</u> to find the local number for calling in your area.

Tennant Company's Ethics Hotline is available 24 hours a day, year-round. A third party — independent of Tennant management — manages the initial intake report. Anonymous reporting is available where allowed by law.

When you submit a report, we will promptly review the report in a manner designed to protect confidentiality. If warranted, a full and fair investigation will be conducted and we will take appropriate corrective action based on that investigation, if needed.

It takes courage to speak up, and Tennant Company will protect individuals who submit a report in good faith. We are committed to creating an environment that welcomes open communication and supports employees asking questions and reporting potential violations. Retaliation of any kind is inconsistent with our values, does not support our culture, and has no place in our organization.

"Every day, we have the opportunity, challenge, and responsibility to uphold our well-earned reputation by choosing to act in a way that is grounded in ethical decision-making, regulatory compliance, and high personal integrity as we work to make the world a cleaner, safer, healthier place."

- Dave Huml



## Resources

Ethics & Corporate Compliance team	Ethics@tennantco.com	
Legal Department	Legal@tennantco.com	
Privacy	Privacy@tennantco.com	
Human Resources	Local Human Resources Representative	
Diversity, Equity & Inclusion	DEI@tennantco.com	
Employee Health & Safety	CorpEHS-Safety@tennantco.com	
Global Trade Compliance team	ImportExport@tennantco.com	
Sustainability	SustainabilityReport@tennantco.com	
Investor Relations	+1 (763) 540-1200 (general) +1 (763) 540-1600 (investors)	
Accountants	See our registered public accountants as listed on our website here	

#### **Unethical or Illegal Conduct**

Use the Tennant Company Ethics Line or contact Tennant Company directly if you know of or suspect unethical or illegal conduct.

Ethics & Corporate Compliance Tennant Company 10400 Clean Street Eden Prairie, Minnesota 55344 Email: <u>Ethics@tennantco.com</u>

#### **Accounting Issues**

Use the Tennant Ethics Line or write to the Audit Committee to file a complaint related to Tennant Company's accounting, internal accounting controls, or auditing matters.

Audit Committee of the Board of Directors Tennant Company c/o Ethics & Corporate Compliance 10400 Clean Street Eden Prairie, Minnesota 55344





## Resources

Ethics Line Web/mobile access Tennant.ethicspoint.com

Phone access

- **1.** Dial the access number for your country (see charts by region, below)
- 2. Wait for the tone
- 3. Dial the Tennant Ethics Line Number: 1-877-774-6504

#### Americas

Country	Website	Access Number(s)
Brazil	Site	0-800-890-0288
Canada (English)	Website	877-774-6504
Canada (French Canadian)	Website	877-774-6504
México	Sitio web	01-800-288-2872
United States	Website	877-774-6504

#### Asia-Pacific

Country	Website	Access Number(s)
Australia	Website	1-800-881-011
中国 (China)		Shanghai/Guangzhou: 108-10 Beijing: 108-710
भारत (India)	<u>वेबसाइट</u>	000-117
日本 (Japan)	<u>ウェブサイト</u>	KDDI 00-539-111 Or Softbank Telecom 00-663-5111
New Zealand	Website	000-911





# Resources

#### Europe

Country	Website	Access Number(s)
Belgium	<u>Website</u>	0-800-100-10
France	Site web	0-800-99-0011
Germany	<u>Webseite</u>	0-800-225-5288
Italy	Sito Web	800-172-444
Netherlands	<u>Website</u>	0800-022-9111
Norway	Nettsted	800-190-11
Portugal	Site	800-800-128
Spain	Sitio web	900-99-0011
Sweden	<u>Hemsida</u>	020-799-111
United Kingdom	Website	0-800-89-0011



