



Charles Tennant & Company / Compagnie

A division of the Tennant Group of Companies

CTC RESPONSIBLE SOURCING POLICY

This policy applies to all Charles Tennant & Company (Canada) Limited (“**CTC**”) employees engaged in the sourcing and purchasing of raw material, and selection of sub-contracting services. It establishes guidelines for the responsible sourcing of raw material, packaging, subcontract services and other supplies of goods or services.

CTC is a manufacturer and distributor of chemicals. CTC primarily sources raw materials and other components and engages contract manufacturing services on a global basis. We therefore recognise that our supply chain activities have a broad global impact, with our responsibilities extending beyond our own operations, and into those of our supply partners and customers. We also recognise that there are local and national differences in standards in relation to many aspects of a supply partners business, however there are a number of minimum standards that must be achieved by all supply partners to CTC and are set out in this policy.

CTC’s Responsible Sourcing Policy (“**RSP**”) was updated in 2025, to reinforce our commitment of working together with our chosen supply chain partners, to our mutual benefit, over a long-time horizon to make us each successful in a more sustainable manner.

SUPPLY CHAIN PARTNER RELATIONSHIP FRAMEWORK

Integrity in Our Relationships

CTC strives to act as a reliable business partner and wishes to do business with supply chain partners who:

1. Share our commitment to the highest standards of integrity; and
2. Conduct business responsibly.

Thus, we choose our supply chain partners with care, using a transparent selection process based on objective criteria.

Compliance with the Law

CTC is serious about conducting business in strict compliance with applicable current laws, rules and regulations. Our procurement business activities meet the highest ethical and professional standards, and we expect our business supply chain partners to comply with this RSP as well as with all current applicable laws, rules and regulations. Additionally, we ask our supply chain partners to communicate this RSP to their own providers and sub-contractors, and to encourage them to integrate it into their own policies and practices.

Protection of Personal Data

CTC collects, uses and processes personal data for legally permitted professional purposes only, in compliance with applicable laws, rules and regulations, protecting them from unauthorised access, disclosure and use. We expect our supply chain partners to undertake the same strict commitment to protecting personal data.

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Continuous Improvement of our Performance on Corporate Social Responsibility (“CSR”) Issues

In order to ensure continuous improvement on CSR issues, we strive to build long term relationships with our supply chain partners. We endeavour to assist our strategic supply chain partners towards improving their CSR performance in accordance with our expectations on these issues. We assist our supply chain partners in developing their “know how” and their ability to innovate while also helping them set up suitable management systems and operational procedures.

Adhering to our RSP also means that our supply chain partners agree that we may conduct inspection visits or appoint third parties to carry out audits to enable us to ensure systematic compliance with the principles of this Policy and to discuss measures to be taken in order to continuously improve.

Protecting Confidential Information, Intellectual Property and “Know How”

CTC respects the confidentiality of our supply chain partners’ technical and trade information, as well as their proprietary and intellectual property rights. On the same basis, our supply chain partners, their employees and partners are expected to respect CTC’s proprietary and intellectual property rights and to maintain strict confidentiality of all types of information to which they may have privileged access (ie not publicly available) pertaining to CTC’s products and our “know how”, whether technical, industrial, commercial, or financial in nature.

UNITED NATIONS GLOBAL COMPACT

CTC recognises the importance of the United Nation’s Ten (10) Principles of Global Compact covering general commitments in the areas of human rights, the environment and business ethics. CTC asks that its supply chain partners adhere to them as well. Businesses should:

Human Rights:

1. Promote and respect the protection of internationally proclaimed Human Rights;
2. Make sure that they are not complicit in Human Rights abuses;

Labour:

3. Uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. Uphold the elimination of all forms of forced and compulsory labour;
5. Uphold the effective abolition of child labour;
6. Uphold the elimination of discrimination in employment and occupation;

Environment:

7. Support a precautionary approach to environmental challenges;
8. Undertake initiatives to promote greater environmental responsibility;
9. Encourage the development and diffusion of environmentally friendly technologies; and

Anti-Corruption:

10. Work against corruption in all its forms, including extortion and bribery.



CONFLICT MINERALS POLICY

As stated above, CTC is committed to ethical and responsible sourcing practices across our operations and supply chain. While we do not directly procure or use conflict minerals—tin, tantalum, tungsten, and gold (3TG)—as defined by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, we recognize the importance of preventing the use of materials that may contribute to human rights abuses or armed conflict in the Democratic Republic of the Congo (DRC) or adjoining countries.

CTC pledges to:

- Uphold responsible sourcing principles by ensuring our supply chain adheres to ethical standards.
- Engage with suppliers to confirm that any materials or components provided to us are sourced responsibly and do not contribute to conflict or human rights violations.
- Support industry efforts, such as the Responsible Minerals Initiative (RMI), to promote conflict-free sourcing practices globally.
- Comply with applicable laws and regulations related to conflict minerals, should they become relevant to our operations.

We expect our suppliers to:

- Maintain policies and practices that ensure 3TG minerals, if used, are sourced from conflict-free and responsible sources.
- Provide transparency regarding the origin of materials upon request, utilizing tools such as the Responsible Minerals Initiative's Conflict Minerals Reporting Template (CMRT) when applicable.

SOCIAL REQUIREMENTS

Fair Employment Practices

CTC's policy is to foster and maintain a positive work environment where everyone is treated with respect and dignity. We commit to act fairly, as regards to employment and to conduct business in compliance with all applicable labour and employment laws, rules and regulations.

Thus, CTC expects its supply chain partners to conduct their own business in strict compliance with all applicable labour laws, rules and regulations in the countries where they do business, in order to foster a positive work environment with respect and dignity, and not tolerate any form of illegal discrimination harassment or intimidation.



Additionally, we also expect our supply chain partners to respect the United Nations Universal Declaration of Human Rights and the core conventions of the International Labor Organization (“ILO”) taking into account their size and situation, and to ensure their own partners do the same, particularly regarding:

Compensation

All workers must be paid a fair compensation package that meets or exceeds at least the statutory minimum wage, with no discrimination whatsoever, and not be subject to withholding from their pay for disciplinary reasons or for any other reason not provided for by applicable regulations.

Working Hours

Working hours and weekly days off shall be determined in strict compliance with applicable regulations and furthermore must also ensure employees safety.

Non-Discrimination

No harassment or discrimination will be tolerated, specifically but not exclusively, during recruitment, position changes or transfers, on the basis of social or ethnic origin, gender, age, family status, nationality, political opinions, labour union activities, religious beliefs, physical appearance, health, disabilities, pregnancy or any other illegal reason not mentioned.

Prohibition of Forced Labour and Prison Labour

No use shall be made of forced work, labour performed under duress, servitude or compulsory labour in prison settings.

No restriction shall be placed upon freedom of movement of employees and their families. It is prohibited to keep the originals of employees’ personal documents or require them to provide deposits or financial guarantees as a condition of their employment.

There shall be no compulsory labour as defined in the fundamental conventions of the ILO: “all work or service which is required from any person under the threat of any penalty whatsoever and for which the said person has not offered himself voluntarily.”

Child Labour

Our supply chain partners must refrain from hiring, in any country whatsoever, persons who are not the minimum age, as per applicable laws and regulations, required to work for their business operations. They may only employ people under the age of 18, voluntarily, in specific cases under local law (for example, an apprenticeship or an internship during vacation) and for jobs posing no risk to their health or safety.

Freedom to Form Unions and the Right to Collective Bargaining

Our supply chain partners must undertake to respect the freedom of association and the right to organise and bargain collectively in compliance with applicable laws and existing collective bargaining agreement as defined in the core ILO conventions.



Right to report, free from retaliation

Workers whether directly or indirectly employed by our supply chain partners should be given channels through which they may have the opportunity to raise concerns in good faith regarding employment practices, without the threat of retaliation, and furthermore should be protected from any such act. Such concerns are treated with care, confidentially and in a timely manner that seeks a fair resolution.

Indigenous Land rights

CTC respects the local communities in which it operates. As a North American incorporated company, we acknowledge the rights and title to property and the land of the individual, particularly when considering the impact regarding indigenous peoples with whom we share and respect the land. We request our business partners consider the impact on indigenous people's legitimate land rights, and any negotiations which are entered into are done transparently, with free and informed consent, and without exploitation of traditional indigenous territories.

Health and Safety

CTC's policy is to assure our colleagues, customers and third parties that we provide healthy and safe conditions on our premises by complying with current regulations and best practices in effect.

We expect our supply chain partners to commit to implementing an equivalent policy at their sites, with the goal of ensuring a safe and healthy workplace for all employees and maintaining an environment respecting each other's dignity.

This environment must ensure that there are no risks to workers' health and safety by informing them fully of potential hazards as to equipment or products being used, by furnishing them with appropriate clothing and equipment, and by providing evacuation and alarm systems, with signage, that are easy to access and use, are in working order and are adapted to any potential risks.

If needed, access to care must be guaranteed for all colleagues. Noise, dust, odours, particles, and any other source of local pollution must be monitored, and mechanisms set up to minimize them and their impact on workers.

ENVIRONMENTAL REQUIREMENTS

CTC ensures compliance with all applicable environmental laws and regulations, and we therefore require that our supply chain partners also commit to refrain from harming the environment, especially regarding the following points:

Prevention of Environmental Risks

Our supply chain partners must carry out business activities in a way that respects the environment, ensuring compliance with applicable legal requirements as well as environmental standards specific to their industries. Supply chain partners should also apply the precautionary principle in their approach to environmental issues, striving to control potential risks by adopting best practices. In addition, we encourage supply chain partners to set up procedures for continuous improvement to reduce their environmental footprints.



Chemical and Dangerous Substances

Our supply chain partners must undertake to respect any prohibitions and restrictions on substances and materials as required by various regulations and by CTC, ensuring their products do not contain any restricted or prohibited materials. They shall undertake to inform CTC immediately when making any changes whether required or voluntary to the composition or manufacturing processes of products delivered.

Chemical products and other substances that could be dangerous to the environment if released must be identified, labeled, and managed in order to guarantee that they are handled, used, transported, stored, recycled or reused, and discarded safely in compliance with all regulations.

Workers handling these products and other materials must be trained and properly equipped. Emergency procedures must be in place in the event of an accident that could represent a risk to employees or the environment.

Impact on the Environment and Biodiversity (Including Respect for Protected Species and Animals)

We encourage our supply chain partners to take baseline measurements and implement plans to reduce the use of non-renewable resources, energy and water consumption, greenhouse gas emissions, and pollution at the local level. Additionally, we encourage our supply chain partners to respect protected species, animal well-being and improve the sustainable use of local resources.

All supply chain partners subject to local and/or international regulations, such as the Convention on International Trade in Endangered Species (“CITES”) or any regulation implementing the principles of the Convention on Biological Diversity and the Nagoya Protocol must strictly comply with these regulations, and when supplying products containing plant and/or animal materials, must agree to send all related information and proof of origin for these materials as well as any certificate attesting to their access in accordance with the law.

We seek a commitment that any materials, emissions, or substances discharged into the air, water or earth that could represent a hazard to the environment be identified, monitored, controlled, and treated in compliance with regulations before being released.

Waste reduction and Optimising Recycling

We also encourage our supply chain partners to monitor all types of waste in order to reduce or eliminate waste through practices such as making changes to production, improving techniques for maintenance and improving equipment, replacing materials with cleaner ones and reducing, reusing and recycling materials.



ETHICS & TRANSPARENCY REQUIREMENTS

Business Ethics

CTC selects its suppliers and business partners with great care, maintaining relationships only with those who share its commitment to complying with the highest possible ethical standards. By acting ethically and with absolute integrity CTC strives to be a reliable business partner, protecting its reputation and that of its supply chain partners.

We expect our supply chain partners to comply with all laws, regulations and best practices that apply to their business, both in relation to the activity conducted on behalf of CTC and also in relation to all other business activities, whether domestic or international, especially in the following fields:

Anti-Corruption, Bribery and Money Laundering

We mandate that our supply chain partners shun all types of corruption (including “facilitating payments”), whether active or passive, in all business transactions, and that they only work with supply chain partners who comply with these same principles.

Our suppliers must ensure that their policies and practices regarding gifts, invitations and benefits do not break any law and comply with ethical guidelines, and acceptable business practices: any gifts, invitations and benefits cannot be perceived as influencing business decision in any way whatsoever. Acts of bribery, extortion, embezzlement and corruption are prohibited. Cash gifts are not allowed, and other gifts must be properly recorded and documented.

We require that in conducting their business activities, our supply chain partners ensure that the source of all funds is legal, and in full compliance with all laws, rules and regulations regarding money laundering and financing of terrorism.

Conflicts of Interest

We expect our supply chain partners to disclose to CTC any situation that could entail a conflict of interest, or even the appearance of one: they must forbid all practices designed to promote either direct or indirect personal interests.

Economic Dependence

We commit to our supply chain partner to remain alert to any economic dependency, and we ask that they make a personal commitment to act as responsible business managers (And to require the same from their partners), ensuring the development of a customer base that is diversified enough to guarantee that services rendered to any client do not result in an economic dependency situation.



Compliance with Business Practices

Our supply chain partners must strictly comply with all laws and regulations that apply to their business activities, especially as pertains to accounting, taxes, and customs (including those involving imports, exports, and international sanctions). CTC may at any time require suppliers to provide information on the country of origin of products delivered and on the supply sources for components and raw materials used to manufacture these products.

Compliance with Competition Law

Our supply chain partners must comply with all applicable laws relating to competition.

Due Diligence Checklist

Appendix A is a due diligence checklist which must be completed for all supply chain partners.

Vendor Attestation

I have read CTC's Responsible Sourcing Policy and certify that the company I represent is compliant with all minimum standards of conduct stated in that policy.

Name of Company Representative

Signature

Date

REVISION NUMBER: 2

REVISION DATE: JULY 2025



**APPENDIX A:
CTC Responsible
Sourcing Policy
Due diligence
checklist**

It is necessary to conduct appropriate due diligence for every supplier and their associated supply chain, which may work with CTC entities prior to completing the supplier onboarding process.

Prior to engaging any supplier, CTC employees should follow the following checklist to satisfy themselves the applicability of the Responsible Sourcing Policy:

CTC Entity: Name of Purchasing Agent:		Name of supplier: Annual Value of expected business (CAD):		
No.	Preliminary Questions	Response		Purchasing team assessment
		(Yes/No/Not Applicable)	Comments (Supplier)	
Labour welfare				
1	Is there a designated person or personnel who is responsible for labour welfare and labour law compliances? Mention the name and position.			
2	Are there written policies for the facility/ies covering the aspects such as child labour, forced labour, slavery and human trafficking and sexual exploitation?			
3	Is training provided on labour laws, child labour, forced labour, sexual exploitation, human trafficking and slavery to workers including contract workers?			
4	Does the company forbid the practice of keeping original documents (like identity documents, passport etc.)/Financial deposits in form of recruitment fees from workers used?			
5	Are all employees (including contractors) provided with understandable appointment/ employment letters and the employment agreement terms contain the termination clause exercisable by the employees?			
6	Are there disciplinary policies and procedures that contain any corporal (physical) punishment, mental or physical coercion, or resulting in wage deductions, reduction in other employment benefits or forced labour?			
7	Are any workers working excessive overtime beyond legal limits?			
8	Are records maintained for overtime working of all employees and suitably compensate them as per the local labour laws?			
9	Are the mandated social benefits provided to all workers including contract workers (as applicable as per local laws such as government pension fund, Employment Insurance, workers compensation etc.)?			
10	Are all employees are entitled to paid holiday and paid sick leave (which is not deducted from employees' holiday allowance) and these arrangements are in accordance with national law or as otherwise agreed (for example with workers' unions / workers' representatives).			
11	Are there defined expectations from your suppliers for compliance to local labour laws (by way of agreement, declaration etc.)?			

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12	Does the company have mechanisms/practices/policies in place for recording, investigation, processing, and settling the grievances of employees in relation to human rights?			
13	Are workers/ employees are paid minimum wages as per the prescribed applicable laws?			
14	Are there any known cases of human rights/ labour law non compliances against you/ your organization of which CTC should be aware of?			
Environmental impact				
15	Does the company have established procedures for the proper disposal of chemical waste?			
16	Are procedures in place to handle and manage hazardous materials throughout their lifecycle?			
17	Does the company transport hazardous chemicals? Does the company mitigate risks associated with the use and transportation of hazardous chemicals?			
18	Does the company have methods to ensure environmentally friendly hazardous waste disposal?			
19	Does the company have measures in place to monitor and control emissions from facilities?			
20	Does the company ensure compliance with local and international emission standards?			
21	Are there specific recycling initiatives within the company for materials used in manufacturing processes?			
22	Does the company promote and participate in the recycling of chemical products or by-products?			
23	Does the company ensure compliance with the Convention on International Trade in Endangered Species (CITES)?			
24	Is there any documentation or certifications demonstrating adherence to CITES regulations?			
25	Are regular environmental impact assessments conducted for manufacturing processes? How does the company address and mitigate adverse environmental impacts identified during assessments?			
26	Are steps taken to monitor and ensure the quality of water discharges from facilities?			
27	Have steps been taken to reduce energy consumption and improve energy efficiency (in manufacturing processes)?			
28	Is there any data or reports on any energy-saving initiatives?			
29	Does the company engage with the local communities where facilities are located to address environmental concerns?			
30	Has the company implemented any community outreach or education programs related to environmental sustainability?			
31	Are there procedures are in place for responding to and mitigating the impact of chemical spills?			
32	Are there detailed emergency response plans for chemical accidents?			
33	Does the company hold environmental certifications, and how do they align with industry standards?			
34	Is there ongoing compliance with environmental regulations at both national and international levels?			
35	Are there guidelines or criteria in place to ensure the sustainability of the company's supply chain?			

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36	Are the company's raw material suppliers subject to vetting and monitoring of their environmental practices?			
37	Are renewable resources incorporated in the company's manufacturing processes?			
38	Are there any initiatives or goals related to increasing the use of renewable resources in products?			
39	Does the company foster a culture of continuous improvement regarding environmental practices?			
40	Are there examples of recent initiatives or changes made to enhance environmental performance?			
Social impact				
41	Does the company address and respect the rights and interests of indigenous communities? Especially those in areas where they operate?			
42	Are there examples of how the company's operations align with or support indigenous rights?			
43	Are there measures in place to prevent bribery and corruption within the organization?			
44	Does the company ensure compliance with international anti-corruption laws and standards?			
45	Are there steps that are taken to prevent and detect money laundering activities?			
46	Is there any information on any training or awareness programs related to money laundering prevention for employees?			
47	Does the organization identify and manage conflicts of interest among employees?			
48	Are there policies in place to ensure transparency and fair decision-making in situations involving potential conflicts of interest?			
49	Does the company ensure compliance with competition laws to promote fair business practices?			
50	Are there any specific training programs for employees regarding competition law and antitrust regulations?			
51	Are procedures and protocols in place to ensure the health and safety of employees in the workplace?			
52	Are there examples of initiatives or investments made to enhance health and safety conditions?			
53	Does the company promote diversity and inclusion in the workplace?			
54	Does the company have policies related to fair employment practices, including hiring, promotion, and equal opportunities?			
55	Are steps taken to ensure that employees' rights, including the right to organize and collective bargaining, are respected?			
56	Are working conditions monitored and addressed in facilities, including working hours and employee welfare?			
57	Does the organization ensure that child labour and forced labour are not present within your supply chain?			
58	Are measures in place to verify the age and working conditions of employees, especially in high-risk areas?			
59	Are continuous training and development initiatives in place for employees?			
60	Are there programs aimed at enhancing the skills and well-being of the workforce?			
61	Does the company engage with local communities to understand and address their social needs?			

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62	Are there any social impact projects or initiatives undertaken by the organization?			
63	Are measures in place to protect employees who report unethical behavior or violations within the organization?			
64	Is confidentiality and anonymity of whistleblowers ensured?			
65	Is there a supplier code of conduct, and does the company ensure that your suppliers adhere to ethical and social standards?			
66	Are steps taken when suppliers fail to meet the specified social criteria?			
67	Does the company conduct human rights due diligence, especially in high-risk regions or industries?			
68	Are there examples of actions taken in response to identified human rights risks?			
69	Does your organization have a policy or process in place to ensure that tin, tantalum, tungsten, and gold (3TG) in your supply chain are sourced responsibly and do not contribute to human rights abuses or conflict in the Democratic Republic of the Congo (DRC) or adjoining countries?			
70	Can you provide documentation (e.g., Responsible Minerals Initiative's Conflict Minerals Reporting Template or equivalent) to demonstrate that any 3TG minerals used in your products are sourced from conflict-free smelters or refiners?			