



Tennant Metallurgical Group Ltd

(the "Company")

MODERN SLAVERY STATEMENT

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes slavery and human trafficking statement for the financial year ending 31st December 2018.

Organisational structure

This statement covers the activities of all the companies in the group headed by Tennant Metallurgical Group Holdings Ltd a company registered in England and Wales. This statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, officers, agency workers, agents, contractors external consultants and business partners.

Our supply chains

We are committed to ensuring that there is an approach, consistent with our obligations under the Modern Slavery Act 2015, to tackling modern slavery throughout our supply chains. We expect the same high standards from all our suppliers, contractors and other business partners, and as part of our contracting processes, we include reference to the aforementioned Act in prohibiting forced compulsory labour or slavery, whether adults or children.

Our policies on slavery and human trafficking

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Responsibility for the policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them, understand and comply with the policy and are given adequate training on it and the issue of modern slavery in supply chains.

The Financial Director has primary day to day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal controls and procedures in connection with the policy.

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Compliance with the policy

All employees receive a copy of this statement and it is returned signed when read and understood. In addition, presentations are made to all staff members to communicate the importance of abiding by the policy.

Employees are encouraged to report any breach, or suspected breach of the policy to the Board of Directors or their line manager without fear any unfavourable treatment for raising a concern, even if this concern turns out to be mistaken.

The policy is communicated through the company's website or sent directly to the relevant persons in the supply chain.

Reference to the Modern Slavery Act 2015 is included in the company's Terms & Conditions.

20th November 2018