



Charles Tennant & Company / Compagnie

A division of the Tennant Group of Companies

Report pursuant to Canada's *Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains*

This report is made on behalf of Charles Tennant & Company (Canada) Limited with respect to the Canada business number 891712598.

This report is made pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act) and outlines the steps we have taken during the financial year ended December 31, 2023, as well as our ongoing planned efforts, to prevent and reduce the risk that forced labour and child labour is not occurring in our supply chains or our organization.

Our Business, Organizational Structure and Supply Chain

Our Business – Charles Tennant is a manufacturer of Mining reagents and a distributor of quality chemicals with a focus on personal care, pharmaceutical, food/nutraceutical, and industrial & institutional products. Charles Tennant is a founding member of Responsible Distribution Canada. We adhere to maintaining written policies, standards and procedures managing risk; communicating information; complying with legal requirements and verifying suppliers and security. We are RDC verified. We also have a bronze rating with Ecovadis.

Our Organizational Structure – Charles Tennant is a member of the Tennants Consolidated Group with its beginnings in 1797 in the United Kingdom. Tennants Consolidated is recognized as one of the largest privately-owned chemical groups involved in the manufacture and distribution of specialty chemical products globally. Our business is divided into two divisions which are Mining and Fine Chemicals divisions. Our headquarters is in Toronto, Ontario, Canada. Our head office operations include finance, Information Technology, human resources, regulatory, administration, sales, warehouse, and an R&D laboratory. Our Mining division has a manufacturing facility in Fort Saskatchewan, Alberta, Canada. At this facility we manufacture mining reagents which are sold to mines across the globe. Our Fine Chemicals division distributes quality chemical ingredients mainly to the personal care, pharmaceutical, food/nutraceutical, and industrial & institutional customers. We have locations across Canada and the United States. These locations include Toronto, Montreal, Calgary, Edmonton, Vancouver, Winnipeg and New Jersey. We have a US wholly owned subsidiary located in New Jersey, USA under the name of Paradigm Science Inc. This company focuses on unique specialty ingredients for cosmetics and personal care

Charles Tennant & Company (Canada) Limited

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Paradigm is noted for its own innovations as well as distribution of world-class manufacturers. We also have an investment in a mining reagent manufacturing facility in China which operates under the name TC China Limited.

Our Supply Chain – Our supply chain is comprised of suppliers of raw materials for our manufacturing process, suppliers of chemical ingredients we distribute to manufacturers of finished goods and suppliers of indirect goods and services such as information technology, professional services, facilities, general office supplies etc. We purchase raw materials and distribution ingredients mainly from North America, Europe, and Asia. Most of our suppliers of indirect goods and services are from North America.

Our Policies & Actions on Preventing Forced Labour and Child Labour

We recognize that slavery, forced labour or compulsory human trafficking is a global and increasing challenge for government and businesses and we recognize our responsibility to respect human rights and manage the risk of forced labour and child labour in our organization and supply chain. As such we have established the following policies.

Code of Business Conduct and Ethics – Charles Tennant has a range of corporate policies and procedures designed to support ethical business conduct and mitigate the modern slavery risks in its supply chains.

Charles Tennant has adopted several policies including, Anti-Bribery and Corruption, Modern Slavery Statement, Whistleblowing, Discrimination, Harassment, Workplace violence, Sustainability, Employee Handbook outlining our commitment to adhere to the law, minimum wage, vacation, other leaves, etc.

Supplier Code of Conduct – As part of our sustainable platform Charles Tennant has implemented a Responsible Sourcing policy, which hold suppliers accountable to applicable legal requirements and best practice standards regarding among other things, environmental practices, ethical business conduct, diversity, and human rights. The Responsible Sourcing Policy explicitly requires suppliers to respect the fundamental human rights of all workers and the applicable International Labour Standards maintained by the International Labour organization. Charles Tennant requires all suppliers to comply with this policy.

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Risk Assessment & Due Diligence

Charles Tennant has implemented the requirement for all suppliers to certify their compliance to our Responsible Sourcing Policy. Our onboarding process of new suppliers also includes this requirement. As part of this due diligence process, we have contacted all our raw material suppliers, our suppliers of distribution ingredients and are in the process of contacting all our suppliers of indirect goods and services in our supply chain. As part of this process, we require our suppliers to answer detailed questionnaires and attest to compliance in their supply chains to all areas required by the Act. Over and above our current methods of verification, we will be expanding our monitoring for compliance process by way of verifications, which can include an audit or site visit.

Charles Tennant has not identified any instances of forced labour or child labour in its supply chains and therefore the question of remediation is not applicable.

Ongoing Training and Awareness Program – Charles Tennant as part of the Tennants Consolidated Group of companies has been involved in training and awareness of its employees with respect to modern slavery and child labour for several years.

Charles Tennant has trained its personnel involved in the sourcing of products with respect to Fighting Against Forced Labour and Child Labour in Supply Chains. This training is being expanded to all its employees in the coming year and is committed to ongoing training and awareness going forward into the future.

Approval and Attestation

This entity report is submitted to the Minister of Public Safety in accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

This entity report was approved by the board of directors of Charles Tennant & Company (Canada) Limited effective May 31, 2024 pursuant to subparagraph 11(4)((a) of the Act.

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In my capacity as a Corporate Secretary of Charles Tennant & Company (Canada) Limited, and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Charles Tennant & Company (Canada) Limited. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the 2023 reporting year.

Full name: Marcelo Ulloa

Title: Corporate Secretary

Date: May 31, 2024

Signature: 

I have the authority to bind Charles Tennant & Company (Canada) Limited

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