

Country of Origin Determination

"Country of Origin" is a critical element in Tennant Company's item profile set-up. It is Tennant Company's policy to be in compliance with all rules and regulations governing cross-border transfer of goods and included in that set of requirements are Country of Origin declaration and labeling requirements. Providing accurate Country of Origin (country of manufacture) for each item purchased is a <u>mandatory requirement</u> of Tennant suppliers. Proof of Country of Origin may be provided in various written forms depending upon the respective trade program or for general import/export purposes. <u>If</u> there is a change in sourcing that affects the country of origin, the Supplier must notify Tennant in writing immediately.

The purpose of this document is to provide Tennant Suppliers with a general understanding of Country of Origin determination and to explain Tennant's requirements of its Suppliers located at www.tennantco.com/company/suppliers. These procedures are not, nor shall they be construed as, a substitute for compliance with applicable U.S. and foreign governmental regulations.

Country of Origin is the single nation of manufacture, production or growth of the product. If the product is manufactured in more than one country, its Country of Origin is the place where it last underwent a "substantial transformation." Substantial transformation is defined as a manufacturing or assembly operation that results in a new article with a "different name, character, or use."

All suppliers <u>MUST</u> provide Country of Origin information for each item purchased by Tennant on either the quote form or via email to the appropriate Tennant Procurement Specialist prior to that specialist's creation of a purchase order.

For more information regarding Country of Origin rules, please refer to

Code of Federal Regulations part 102 (19 CFR 102):

http://ecfr.gpoaccess.gov/cgi/t/text/text-

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In Addition:

Suppliers of US-, Canadian- or Mexican-originating products (NAFTA):

If a Product qualifies for preferential treatment under the North American Free Trade Agreement ("NAFTA"), the Supplier shall provide a properly completed and signed NAFTA certificate of origin or an equivalent manufacturer's affidavit. Each calendar year Tennant Company will solicit a new blanket NAFTA certificate of origin for any product that originates in US, Canada or Mexico. Suppliers may email the annual blanket NAFTA certificate of origin or affidavit to importexport@tennantco.com or fax our Free Trade Agreement Specialist at (763) 513-1710. For more information regarding NAFTA rules of origin, please consult General Note 12 of the Harmonized Tariff Schedule of the United States.

www.usitc.gov/tata/hts/index.htm

European Suppliers:

European Suppliers with European Union-originating products may submit the appropriate Long Term Declaration form or equivalent Supplier Statement to the appropriate Tennant Procurement Specialist. Each calendar year, Tennant Company will solicit new Long Term Declarations or Supplier Statements. For more information on European rules of origin, please refer to the following website: http://ec.europa.eu/taxation customs/customs/customs duties/rules origin/index en.htm