

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT 2025

Huron Tractor Ltd.

This Modern Slavery Report (the "Report") addresses the period from December 31, 2024 to December 30, 2025 and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the "Act").

This Joint Report is made on behalf of SB 2010 Holdings Corp. (the "Parent", "SB 2010 Holdings Corp.", or "SB 2010") and its subsidiary Huron Tractor Ltd. ("Huron Tractor Ltd.", "Huron Tractor", and together with the Parent, the "Corporation", "we", "us" or "our"). SB 2010 Holdings Corp., as a holding company, substantially relies upon the efforts of Huron Tractor Ltd., as the operating business, for the purposes of managing and monitoring its supply chain operations and compliance programs.

This Report is intended to be published on Huron Tractor Ltd.'s website following approval and submission to Public Safety Canada. A copy of this report may be requested by emailing FCLAfeedback@hurontractor.com.

I. INTRODUCTION

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading business in the agricultural equipment industry, Huron Tractor Ltd. and its parent SB 2010 Holdings Corp. recognize the important role we have in seeking to ensure that the supply chains that support our operations and products adhere to high ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the steps we have taken during Fiscal 2025 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by the Corporation, or of goods imported into Canada by the Corporation.

II. OUR BUSINESS

Huron Tractor Ltd. is an equipment dealer headquartered in Ontario, Canada and is majority held by SB 2010 Holdings Corp. SB 2010 Holdings Corp. and Huron Tractor Ltd. are both corporations incorporated under the Business Corporations Act (Ontario). Huron Tractor Ltd. distributes agricultural, commercial compact worksite, and residential equipment including products such as tractors, planting and seeding equipment, and harvesting equipment. We also supply parts, attachments, and services to support those products. We operate eleven physical locations in Ontario, Canada with some products also available online through our website, www.hurontractor.com. Our customers are largely the end-users of our products, consisting mainly of agricultural businesses and consumers located in Canada. We occasionally supply agricultural equipment and associated products to other equipment distributors.

Huron Tractor Ltd. employs close to 400 employees across the eleven branch locations in Ontario. Huron Tractor Ltd.'s physical store locations are in or near Exeter, Blyth, Thamesford, St. Thomas, Arva, Mitchell, Walkerton, Chatsworth, Chatham, Comber and Stayner. A hybrid organizational structure is used to best manage human capital. Employees within each store report to their respective department managers and those department managers report to both store managers and/or corporate managers. All store locations have a dedicated store manager responsible for operations at that location. Each store is staffed with personnel that support all aspects of the business - equipment sales, parts, and service. Store managers report to the corporate managers.

Huron Tractor Ltd.'s supply chain includes businesses that supply agricultural parts and equipment, and supply services to our organization. We receive goods from our suppliers as finished complete goods and parts. The goods received are in saleable condition and ready for the end-user. Complete goods may require predelivery to customer specifications to ensure the equipment is field ready. Most of our direct suppliers are North American-based agricultural equipment manufacturers and distributors, who are based in Canada and the United States. Our supply chain may indirectly also include businesses that are based in other parts of the world.

In total, we procure goods and services from approximately 1,100 suppliers and contractors. Because Huron Tractor Ltd. is a dealer for one of the main suppliers of agricultural equipment in the world, most of its purchases, based upon dollar value, unit volume, and products carried, are procured from this single Tier 1 supplier. Further information about our business can be found on our website.

III. OUR POLICIES AND DUE DILIGENCE

Policies

Through our various corporate policies, we communicate our values and expectations, setting a high bar for ourselves and for our suppliers, and make it clear that Huron Tractor Ltd. operates its business to the highest standard of conduct. We are committed to consistently evolving and improving our approach. We do not tolerate child, forced or bonded labour in any of our operations, or in the operations of our suppliers, subcontractors, and other business partners. We strive to make every effort to prevent our activities from having a negative impact on human rights. Huron Tractor understands that respecting human rights is a shared responsibility for our company. Our business model has been built on a respectful and inclusive corporate culture that earns trust from, and builds value for, our customers, employees, and suppliers.

Our relevant policies are discussed in further detail below:

About Huron Tractor

Our "About Huron Tractor" policy highlights our values of commitment, teamwork, continuous improvement, trust, and respect. These values are top of mind as we execute our Mission of providing a rewarding workplace for our employees, being a responsible and supportive member of the community, while maintaining strong and rewarding relationships with our suppliers. We are committed to conducting our business in a lawful and ethical manner. The "About Huron Tractor" policy is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, Huron Tractor Ltd. employees should always act lawfully, ethically and in the best interests of Huron Tractor Ltd.

Human Rights

The Human Rights policy was created in accordance with the Ontario Human Rights Code. Huron Tractor Ltd. does not condone or tolerate acts of discrimination or harassment in the workplace against or by an employee. The policy will be reviewed annually or as needed to address risks to human rights within our supply chain and third-party relationships.

Code of Conduct

Huron Tractor Ltd.'s Code of Conduct aims to protect our employees, suppliers, customers, the public and the company from any illegal or damaging actions committed by individuals, either knowingly or unknowingly. Huron Tractor Ltd. does not tolerate wrongdoing or impropriety and addresses such matters by taking appropriate disciplinary and/or corrective actions.

Conflict of Interest

The Conflict of Interest policy promotes a risk-aware culture of doing what is right. It sets the benchmark that employees are expected to make decisions free from the influence of personal or family relations and financial interests to ensure business is conducted in a professional and ethical manner.

Whistleblower Policy

Our Whistleblower policy is titled "Employee Protection". It reinforces the high standards that Huron Tractor Ltd. expects of its management and employees. It outlines a policy that allows an employee to file a written complaint with the executive team about any policy, practice, or activity that they feel may be a violation of the law or Huron Tractor's Code of Conduct.

Supplier Code of Conduct

The Supplier Code of Conduct sets out the expectations and policies that suppliers doing business with Huron Tractor need to adhere to. This document establishes standards addressing compliance with applicable laws, protection of human rights, and operating in a manner that does not directly or indirectly cause or contribute to forced labour or child labour. Existing material suppliers were provided with the Supplier Code of Conduct in

late 2024. During Fiscal 2025, Huron Tractor did not redistribute the Supplier Code of Conduct to existing suppliers; however, the Code remained part of Huron Tractor's supplier expectations and due diligence framework. Huron Tractor intends to provide the current Supplier Code of Conduct to new suppliers as part of the onboarding process.

Due Diligence

Huron Tractor Ltd. expects third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. As part of being socially responsible, Huron Tractor Ltd. takes steps to evaluate third-party relationships and mitigate associated risks through a risk-based due diligence approach that will continue to evolve.

We acknowledge that employees working in our supply chain may be at potential risk of forced labour or child labour. To help mitigate this risk, we use a due diligence approach that includes the following steps:

- embedding responsible business conduct into policies and management systems;
- reviewing and updating existing company policies on labour conditions, human rights, and forced and child labour as needed;
- communicating key corporate policies to employees by making them internally available and requiring new employees to acknowledge them as part of onboarding;
- evaluating the risk of forced labour and child labour violations as part of purchasing and supplier onboarding processes; and
- gathering information about Huron Tractor Ltd.'s supply chain by focusing on areas of the business where forced labour and/or child labour risks may be more likely or significant.

During Fiscal 2025, Huron Tractor developed and approved a supplier questionnaire to support new supplier onboarding. The questionnaire is intended to help evaluate forced labour and child labour risk among new suppliers by collecting information about supplier policies, practices, controls, and awareness of applicable legal requirements. The questionnaire had not yet been deployed during the reporting period. Huron Tractor intends to use the questionnaire for new suppliers as part of its onboarding process, together with providing new suppliers with the current Supplier Code of Conduct.

IV. ASSESSING OUR RISK

Huron Tractor Ltd. engages in various activities to identify, assess, and manage supplier risk. During Fiscal 2025, Huron Tractor continued to assess areas of its activities and supply chain that may carry a risk of forced labour or child labour. This review considered the nature of Huron Tractor's purchasing activities, supplier categories, the types of goods and services procured, and known forced labour and child labour risk factors. Huron Tractor has not yet formalized this process into a standalone annual risk assessment report. As part of its continued improvement efforts, Huron Tractor intends to further formalize its risk assessment process in 2026, including documenting the assessment methodology and considering how supplier onboarding information may be used to support future risk-based due diligence.

To identify the business activities with the greatest exposure to these risks, we consider the following factors:

- reliance on low-skilled workforce;
- dangerous or undesirable work;
- presence of migrant workers;
- presence of labour intermediaries;
- offshore production;
- long, complex, or non-transparent supply chains;
- presence of child labour; and
- jurisdictional risks including poverty, conflict, and enforcement of international human rights standards.

Our exposure to the risk of forced labour and/or child labour increases when we engage with third parties, particularly in categories such as transportation, warehousing, construction, manufacturing, packaging, raw material sourcing, and agriculture. We recognize that our exposure to forced labour and/or child labour risk can increase when we engage with suppliers who source goods or raw materials from countries where forced labour exploitation is known to occur. As such, we follow a risk-based approach to our due diligence activities and seek to prioritize efforts based on the severity and likelihood of potential adverse impacts.

V. STEPS TAKEN, REMEDIATION AND TRAINING

Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

During Fiscal 2025, Huron Tractor took the following steps to prevent and reduce risks of forced labour and child labour:

- continued mapping Huron Tractor's operating and purchasing activities;
- continued mapping supply chains and supplier categories;
- continued internal review of risk factors associated with Huron Tractor's activities and supply chains;
- continued to maintain policies and due diligence processes for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains;
- maintained the Supplier Code of Conduct as a standard setting out expectations for suppliers, including compliance with applicable laws, protection of human rights, and avoidance of forced labour and child labour;
- developed and approved a supplier questionnaire intended for use with new suppliers as part of supplier onboarding;
- completed forced labour and child labour training for employees involved in purchasing activities, with completion tracked internally and substantially completed by the targeted employee group; and
- continued to maintain grievance and reporting mechanisms through existing employee reporting channels.

Huron Tractor continues to work toward a practical, risk-based approach that reflects its business model, supply chain structure, and current compliance maturity. In future reporting periods, Huron Tractor intends to continue improving its supplier onboarding process, risk assessment documentation, and related due diligence controls.

Remediation Measures

Our Supplier Code of Conduct requires our suppliers to adhere to high standards of ethical conduct. Forced labour and child labour are strictly prohibited.

During Fiscal 2025, Huron Tractor did not identify, and no incidents were reported to Huron Tractor of forced labour or child labour in its activities or supply chains. Accordingly, Huron Tractor did not take measures to remediate forced labour or child labour during the reporting period. Huron Tractor also did not identify any loss of income to vulnerable families resulting from measures taken to eliminate forced labour or child labour in its activities or supply chains.

Training

During Fiscal 2025, Huron Tractor completed forced labour and child labour training for employees involved in purchasing activities. The training covered the requirements of Bill S-211, the prevalence of forced labour and child labour, how these risks can arise in business operations and supply chains, and the role purchasing employees play in identifying and reducing risk. Training completion was tracked internally and was substantially completed by the targeted employee group during the reporting period.

Employees also have access to corporate policies, including the policies mentioned previously in this Report, which enhance their knowledge surrounding corporate guidelines for human rights and business conduct. Every new employee of Huron Tractor Ltd. must complete mandatory training on our values and policies, including our Code of Business Conduct and Ethics, and is informed of how to report wrongdoing under our Whistleblower Policy. New hires who may be involved in the purchasing process will be required to complete training relating to Bill S-211 requirements.

VI. OUR PROGRESS AND EFFECTIVENESS

Huron Tractor continued to make progress during Fiscal 2025 by maintaining relevant policies, completing training for purchasing employees, developing and approving a supplier questionnaire for new supplier onboarding, and continuing to assess forced labour and child labour risk factors in its activities and supply chain.

As part of our governance processes, policies will continue to be enhanced to incorporate processes to help monitor compliance on an ongoing basis and will be revised as required. We also review concerns raised through our Whistleblower Policy and other informal mechanisms of employee feedback. During Fiscal 2025, no forced labour or child labour incidents were identified or reported to Huron Tractor.

Huron Tractor has not yet implemented formal policies and procedures to assess the effectiveness of its actions in ensuring that forced labour and child labour are not being used in its activities and supply chains. In 2026, Huron Tractor intends to further formalize its effectiveness assessment approach, including consideration of training completion tracking, supplier questionnaire deployment, supplier onboarding controls, and periodic review of risk assessment practices.

VII. APPROVAL AND SIGNATURE

This Report was approved pursuant to subparagraph 11(4)(b)(i) of the Act by the governing bodies of SB 2010 Holdings Corp. and Huron Tractor Ltd. on May 20th, 2026 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

“Cam Barton”

Cam Barton
Director, Huron Tractor Ltd.
I have the authority to bind Huron Tractor Ltd.

“Brad Sheeler”

Brad Sheeler, CPA, CA
Director,
SB 2010 Holdings Corp.
I have the authority to bind SB 2010 Holdings Corp.