

## Fountain Tire Ltd. – Bill S-211 Report for 2025

Bill S-211: An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff.

### Introduction

This report supports Fountain Tire's compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211). The purpose of the Act is to promote transparency and responsible sourcing practices by requiring organizations to disclose how they identify and manage risks related to forced labour and child labour within their supply chains.

Fountain Tire recognizes that participation in global supply chains inherently carries some level of exposure to forced labour and child labour risks, particularly in certain regions and industries. While our current assessment indicates that our exposure is low, we are committed to ongoing monitoring and continuous improvement of our sourcing practices.

### Reporting Period

Fiscal Reporting Year 2025, Submitted May 20, 2026

### Reporting Entity

Fountain Tire Supply is the entity responsible for supplying the majority (~85%) of the tire product that the Fountain Tire Limited group of companies sell and meets the definition of "entity" of which is required to submit a report.

It should be known that Fountain Tire Limited represents a group of companies (via partnerships), however, none of the individual partnerships meet the requirements of "entity" as indicated in Part 2, Section 9 of Bill S-211, therefore has no obligation to report individually.

### Reporting Contact

Michael Fritz, Director Product and Pricing

## Overview of Activities

During our inaugural reporting year, Fountain Tire Supply initiated a structured review of its supplier base. This included identifying primary production locations and collecting publicly available information regarding supplier policies related to forced labour and child labour.

We recognize that tire supply chains are global and may involve production in regions with elevated inherent risk. As part of our approach, we collected supplier disclosures and assessed production locations against known regional risk indicators to better understand potential exposure.

2026 Vendor ESG Summary						
Vendor	ESG Statements or Positions	ESG Rating	Source	Country Risk (Global Slavery Index)		Anti-Slavery Statement
				H.O. Location(s)	Factory Location(s)	
Goodyear	<a href="https://corporate.goodyear.com/us/en/responsibility/esg.html">https://corporate.goodyear.com/us/en/responsibility/esg.html</a>	79	Manufacturer	USA	USA, China, Brazil	<a href="https://www.goodyear.eu/en_gb/consumers/goodyear-modern-slavery-art/modern-slavery-art.html">Modern Slavery Report</a> <a href="https://www.goodyear.eu/en_gb/consumers/goodyear-modern-slavery-art/modern-slavery-art.html">https://www.goodyear.eu/en_gb/consumers/goodyear-modern-slavery-art/modern-slavery-art.html</a> <a href="https://corporate.goodyear.com/us/en/commitments/reports-and-policies.html">Goodyear Reports and Policies</a> <a href="https://corporate.goodyear.com/us/en/commitments/reports-and-policies.html">https://corporate.goodyear.com/us/en/commitments/reports-and-policies.html</a>
BKT	<a href="http://www.bkt-tires.com/us/sustainability">http://www.bkt-tires.com/us/sustainability</a>	57	Manufacturer	India	India	<a href="https://www.bkt-tires.com/wp-content/uploads/2026/01/Business_Responsibility_Policies_-_Labour_Human_Rights_Policy-2.pdf">Human Rights Policy</a> <a href="https://www.bkt-tires.com/wp-content/uploads/2026/01/Business_Responsibility_Policies_-_Labour_Human_Rights_Policy-2.pdf">https://www.bkt-tires.com/wp-content/uploads/2026/01/Business_Responsibility_Policies_-_Labour_Human_Rights_Policy-2.pdf</a> <a href="https://www.bkt-tires.com/wp-content/uploads/2026/01/BKT_SustainabilityReport_2024-2025.pdf">Labour Human Rights Policy-2.pdf</a> <a href="https://www.bkt-tires.com/wp-content/uploads/2026/01/BKT_SustainabilityReport_2024-2025.pdf">Sustainability Report</a> <a href="https://www.bkt-tires.com/wp-content/uploads/2026/01/BKT_SustainabilityReport_2024-2025.pdf">https://www.bkt-tires.com/wp-content/uploads/2026/01/BKT_SustainabilityReport_2024-2025.pdf</a>
Continental	<a href="https://www.continental.com/en/sustainability/">https://www.continental.com/en/sustainability/</a>	78	Manufacturer	Germany	European Union (Main); USA, Mexico, Brazil, Ecuador, R. South Africa, Malaysia, India, China, Thailand. This is only for Tires, and not automotive parts.	<a href="https://www.continental.com/fileadmin/_imported/sites/corporate/international/english/hubpages/00_20sustainability/00_20reports_20_26_20principles/continental_tire_canada_contitech_canada-modern_slavery_statement_2024_bill_s-211.pdf">Canada Forced Labour Statement</a> <a href="https://www.continental.com/fileadmin/_imported/sites/corporate/international/english/hubpages/00_20sustainability/00_20reports_20_26_20principles/continental_tire_canada_contitech_canada-modern_slavery_statement_2024_bill_s-211.pdf">https://www.continental.com/fileadmin/_imported/sites/corporate/international/english/hubpages/00_20sustainability/00_20reports_20_26_20principles/continental_tire_canada_contitech_canada-modern_slavery_statement_2024_bill_s-211.pdf</a> <a href="https://cdn.continental.com/fileadmin/_imported/sites/corporate/international/english/hubpages/00_20sustainability/00_20reports_20_26_20principles/continental_ag_policy_statement_hsg_2024.pdf">Human Rights &amp; Supply Chain Policy</a> <a href="https://cdn.continental.com/fileadmin/_imported/sites/corporate/international/english/hubpages/00_20sustainability/00_20reports_20_26_20principles/continental_ag_policy_statement_hsg_2024.pdf">https://cdn.continental.com/fileadmin/_imported/sites/corporate/international/english/hubpages/00_20sustainability/00_20reports_20_26_20principles/continental_ag_policy_statement_hsg_2024.pdf</a>
Dynamic Tire Inc (Galaxy, Primex, Roadrider, Sailun, Tian Li, Triangle)	<p>•Prioritizing fair labor practices by ensuring safe working conditions, providing competitive wages, offering employee benefits, and promoting diversity, inclusion, and equal opportunities within our workforce.</p> <p>•Promoting employee health and well-being through wellness programs, training, and development opportunities, and fostering a positive work culture.</p> <p>VISIONS</p> <p>•We strive to ensure our vendors are implementing and practicing the following:</p> <p>•Social</p> <p>•Labor Practices: Prioritizing fair labor practices by ensuring safe working conditions, providing competitive wages, offering employee benefits, and promoting diversity, inclusion, and equal opportunities within the workforce.</p> <p>•Employee Well-being: Promoting employee health and well-being through wellness programs, training, and development opportunities, and fostering a positive work culture can contribute to the social aspect of ESG.</p> <p>•Community Engagement: Actively engaging with local communities through initiatives such as educational programs, partnerships, and supporting local development projects to foster positive relationships and contributing to the community well-being.</p>	51	Wholesale Distributor	Canada	China, India, Vietnam	<p><b>Human Rights</b></p> <p>The Company recognizes that governments have the primary responsibility to promote and protect human rights. The Company will work with governments and agencies to support and respect human rights within our sphere of influence.</p> <p>The Company will not tolerate human rights abuses and will not engage or be complicit in any activity that solicits or encourages human rights abuse.</p> <p>The Company will always strive to build trust, deliver mutual advantage and demonstrate respect for human dignity and rights in all relationships it enters into, including respect for cultures, customs and values of individuals and groups.</p>
Kumho	<a href="https://www.kumhotire.com/en/company/sustainableist.do">https://www.kumhotire.com/en/company/sustainableist.do</a>	84	Manufacturer	South Korea	South Korea, China, USA, Vietnam	<a href="https://modernslaveryregister.gov.au/statements/file/6347b182-5f19-45c6-81c2-4eb9b97005ff/">Kumho Modern Slavery Statement</a> <a href="https://modernslaveryregister.gov.au/statements/file/6347b182-5f19-45c6-81c2-4eb9b97005ff/">https://modernslaveryregister.gov.au/statements/file/6347b182-5f19-45c6-81c2-4eb9b97005ff/</a>
Sailun Tire	<a href="https://en.sailungroup.com/portal/responsibility/index">https://en.sailungroup.com/portal/responsibility/index</a>	49	Manufacturer	China	China, Vietnam, Thailand, Cambodia, Mexico, Egypt (soon)	<a href="https://en.sailungroup.com/portal/responsibility/index">Sailun Modern Slavery Statement</a> <a href="https://en.sailungroup.com/portal/responsibility/index">https://en.sailungroup.com/portal/responsibility/index</a> <a href="https://en.sailungroup.com/portal/responsibility/index">Sailun Global Human Rights Policy</a> <a href="https://en.sailungroup.com/portal/responsibility/index">https://en.sailungroup.com/portal/responsibility/index</a> <a href="https://en.sailungroup.com/portal/responsibility/index">Child &amp; Illegal Labor Policy</a> <a href="https://en.sailungroup.com/portal/responsibility/index">https://en.sailungroup.com/portal/responsibility/index</a> <a href="https://en.sailungroup.com/portal/responsibility/index">Lamar on AWS.com.cn/uploads/portal/20250327/475d4e35920e1b4e3d983d7f2302e.pdf</a>
Titan (Carlstar)	<a href="https://ir.titan-intl.com/ESG/default.aspx">https://ir.titan-intl.com/ESG/default.aspx</a>	39	Manufacturer	USA	USA, Brazil, Italy, Russia, India, Sri Lanka	<a href="https://ir.titan-intl.com/ESG/default.aspx">Titan Human Rights Policy</a> <a href="https://ir.titan-intl.com/ESG/default.aspx">https://ir.titan-intl.com/ESG/default.aspx</a>
Toyo	<a href="https://www.toyotires-global.com/csr/esg/">https://www.toyotires-global.com/csr/esg/</a>	83	Manufacturer	Japan	Japan, USA, China, Malaysia	<a href="https://www.toyotires-global.com/csr/pdf/human_rights_en.pdf">Toyo Human Rights Statement</a> <a href="https://www.toyotires-global.com/csr/pdf/human_rights_en.pdf">https://www.toyotires-global.com/csr/pdf/human_rights_en.pdf</a>
Yokohama (Alliance, Primex, Galaxy, Trelleborg, Mitas, Goodyear)	<a href="https://www.y-yokohama.com/global/sustainability/information/backnumber_report/">https://www.y-yokohama.com/global/sustainability/information/backnumber_report/</a>	82	Manufacturer	Japan, USA	Japan, India, Italy, USA, Thailand, Sri Lanka, Czech republic	<a href="https://www.y-yokohama.com/global/sustainability/information/backnumber_report/">Yokohama Human Rights Document</a> <a href="https://www.y-yokohama.com/global/sustainability/information/backnumber_report/">https://www.y-yokohama.com/global/sustainability/information/backnumber_report/</a> <a href="https://www.y-yokohama.com/global/sustainability/information/backnumber_report/">https://www.y-yokohama.com/global/sustainability/information/backnumber_report/</a>

The necessary data has been gathered through surveys and direct requests to vendors for relevant documentation. Fountain Tire has established criteria for evaluating new suppliers, ensuring alignment with our values and commitment to addressing child labor and forced labor practices. We take pride in our proactive stance, having historically partnered only with suppliers that uphold their own stringent codes of conduct, which prohibit such practices. As a result, we have not yet needed to compel any remedial actions from our existing suppliers.

## Compliance with Reporting Obligations

### 1. Disclosure of Due Diligence Measures:

Fountain Tire evaluates new suppliers as part of its procurement process to understand their policies and stated practices regarding forced labour and child labour. Preference is given to suppliers that demonstrate alignment with recognized standards and maintain publicly available policies or codes of conduct.

These expectations are incorporated into supplier selection processes, and periodic reviews of the supplier base are planned to maintain visibility as supplier operations evolve.

## 2. Risk Assessment:

Fountain Tire recognizes that, despite longstanding relationships with reputable suppliers, the global nature of tire manufacturing presents inherent risks of exposure to forced labour and child labour, particularly within certain geographies and upstream supply chains.

To better understand this risk, we have:

- Identified primary supplier production locations
- Assessed these locations against regional risk indicators
- Requested additional supply chain information from suppliers operating in higher-risk regions

Based on currently available information, risk within our direct (Tier 1) supplier base is assessed as low. However, we acknowledge that risks may exist beyond direct suppliers, and further visibility into upstream supply chains remains an area for ongoing monitoring.

## 3. Remediation Efforts:

At this time, no instances of forced labour or child labour have been identified within our direct supplier base based on available disclosures and engagement.

Fountain Tire recognizes that the absence of identified issues does not eliminate underlying risk. If concerns are identified in the future, we will assess appropriate actions, which may include engagement with suppliers, corrective action planning, or reconsideration of supplier relationships.

## 4. Training and Capacity Building:

Fountain Tire recognizes the importance of internal awareness in responsible sourcing practices.

While current assessed risk is low, we are implementing annual awareness training for internal product and procurement teams. This training is intended to:

- Reinforce understanding of forced labour and child labour risks
- Support consistent application of supplier expectations
- Provide guidance on identifying and escalating potential concerns

We will continue to assess the need for enhanced training as part of our ongoing risk evaluation.

## 5. Collaboration and Engagement:

At present, Fountain Tire does not participate in formal external partnerships or industry initiatives specifically focused on forced labour and child labour.

We recognize the potential value of such engagement and will periodically evaluate opportunities to participate in relevant industry groups or frameworks as our program matures.

## Challenges and Lessons Learned

Earlier years of reporting's primary focus has been establishing a baseline visibility into our supplier network and gathering relevant information. This year has been centered around acknowledging risks, and a clearer positioning of due diligence with an introduction of awareness training.

We recognize that supply chain transparency is an evolving area, and gaining deeper visibility beyond direct suppliers represents an opportunity for future program development.

## Future Actions

Fountain Tire will continue to strengthen its approach through:

- Ongoing supplier reviews and data updates
- Integration of labour risk considerations into procurement processes
- Annual awareness training for relevant internal teams
- Continued monitoring of global risk indicators relevant to our supply chain

These actions are intended to maintain our current low-risk profile while improving visibility and responsiveness over time.

## Conclusion

Fountain Tire is committed to responsible sourcing and recognizes that managing risks related to forced labour and child labour requires ongoing diligence.

While our current assessment indicates low exposure within our direct supplier base, we acknowledge the importance of continuous monitoring, supplier engagement, and internal awareness to maintain and strengthen our position over time.

## Approval and Attestation

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 the entity or entities listed above. 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 reporting year listed above.

Jason G. Herle, CEO Fountain Tire Ltd.

May 20, 2026

