



## **2024 Clear North Energy Corp. Modern Slavery Report**

Clear North Energy Corp. ("we", "our", "Clear North" or the "Corporation") has created this report pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Modern Slavery Act**").

This report constitutes Clear North's second report under the Modern Slavery Act. The first report filed by Clear North in the prior year was in its capacity as the successor of Summerland Energy Inc. ("**Summerland**") following an acquisition and amalgamation that took place February 15, 2024.

Clear North does not have any other additional reporting requirements under supply chain legislation in jurisdictions outside of Canada.

### **Background**

Clear North was incorporated under the *Business Corporations Act* (Alberta) on May 20, 2022. The Corporation was formed to explore for and acquire, develop, and produce oil reserves in the Western Canadian Sedimentary Basin.

### **Steps Taken During 2024**

In the previous financial year, Clear North took the following measures to prevent and reduce the risk of modern slavery in its supply chain:

- expanded our employee and contractor training to include guidance with respect to Clear North's expectations and obligations relating to the Modern Slavery Act and outlined the procedures available to all employees and contractors to report concerns; and
- conducted a preliminary initial internal assessment of the risks of forced labour and/or child labour in our supply chain, generally.

### **Structure, Activities and Supply Chains**

- **Structure:** Clear North is a junior, private oil and gas company that at December 31, 2024 had 12 employees, and 4 independent directors, all of whom were located in Alberta.
- **Operations:** At December 31, 2024, Clear North's active operations were all situated in Northern Alberta where Clear North was engaged in the oil and gas extraction industry. Clear North's operations involved exploration and production of crude oil and its assets consisted primarily of equipment required to do this both above and below ground.
- **Supply chains:** 100% of the vendors engaged by Clear North were Canadian companies, with a large number being located in Alberta. Goods procured included equipment inserted downhole, other equipment used for oil production and tanks for oil storage. Notwithstanding that in our view the risk of modern slavery concerns in our supply chains is low given the foregoing factors, Clear North is utilizing supplier management software from Complyworks as a compliance management tool to enable Clear North to undertake prequalification assessments of suppliers, which includes the review of health and safety documents and metrics, Workers' Compensation clearance, insurance and other compliance documents. Clear North has been using this software since inception of the Corporation in 2022.

## **Policies and Due Diligence**

Clear North's Code of Conduct (the "**Code**") is in substantially final form. Once in place, the Code will require all directors, officers, employees, consultants and contractors to have high standards of professional and ethical conduct. In addition, the Code required compliance with all applicable laws, rules and regulations.

Clear North also has contact information on our website to provide direct emergency contact information for the Corporation to ensure any complaints, including those that are related to modern slavery, are identified to management and the Board so that they may be addressed and remediated.

## **Activity and Supply Chain Risks**

Clear North is not aware of any high-risk exposure to modern slavery associated with its business or supply chains. The process of identifying the risks of forced labour or child labour being used in supply chains is ongoing, although initial analysis does not point to any material risk.

The potential risk of forced labour and child labour affecting our supply chains were assessed based on the following key criteria:

- Country of location: modern slavery is expected to have a higher prevalence in certain jurisdictions or locations;
- Product/Commodity: some products or commodities are deemed higher risk in respect of the potential for forced labour or child labour; and
- Industry sector: certain industries present a higher risk of modern slavery compared to others.

Given that Clear North's operations are solely in Alberta, the specialized nature of the goods and services used and produced by Clear North, the highly skilled characteristics of supplier employees and the long-term relationship with many of the suppliers, we believe there is minimal risk of forced labour or child labour occurring in our direct operations.

## **Remediation Measures**

Clear North is not aware of the existence of modern slavery in its business or the supply chains that supported its operations, nor have any remedial measures been necessary. Clear North is also not aware of any loss of income as a result of the measures to eliminate modern slavery.

## **Employee Training**

The Corporation has distributed company-wide correspondence to ensure that all employees are aware of the reporting requirements under the Modern Slavery Act. This report has also been discussed and reviewed with the Board of Directors.

## **Assessment of Effectiveness**

After reviewing our existing policies, procedures, practices, and list of suppliers of materials and services, Clear North believes our risk of modern slavery is low. We believe that our hiring, remuneration, retention and compliance initiatives encourage appropriate behavior of our employees and consultants.

Clear North will periodically review its operations and supply chain to the extent required by applicable laws.

### **Approval and Attestation of the Report**

This report was approved by the Board of Directors of Clear North Energy Corp. on May 28, 2025 pursuant to paragraph 11(4)(a) of the Modern Slavery Act and will be filed with the Minister of Public Safety and Emergency Preparedness. This report is also available on our website at [www.clearnorthernenergy.ca](http://www.clearnorthernenergy.ca).

In accordance with the requirements of the Modern Slavery Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest, on behalf of Clear North, and with no personal liability, that the information in this report is true, accurate and complete in all material respects for the purposes of the Modern Slavery Act, for the reporting year listed above.



Aaron Williams  
President & CEO, and Board Director  
May 28, 2025

I have the authority to bind the Corporation.