

FIGHTING AGAINST FORCED LABOUR & CHILD LABOUR IN SUPPLY CHAINS

ANNUAL REPORT
FINANCIAL YEAR ENDING
DECEMBER 31, 2024



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INTRODUCTION

Regenera Insights Inc. (formerly Delta CleanTech Inc.) ("**Regenera**" or "**Corporation**") is pleased to release its Annual Report ("**the Report**") on Fighting Against Forced Labour and Child Labour in Supply Chains (also referred to as modern slavery) per the requirements put forth in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("**the Act**"). Regenera plays a role in promoting human rights and responsible business practices in Canada and across our global sales and marketing locations. We recognize that risks of forced labour and child labour exist and acknowledge that understanding and managing these risks requires a collaborative approach with our suppliers, workforce and external stakeholders.

REPORTING ENTITY

Regenera was incorporated on December 22, 2020, under the *Business Corporations Act Alberta* and is domiciled in Canada. The registered office of the Corporation is located at #2308 Palisade Dr. SW, Calgary, AB, T2V 3V1.

On August 19, 2021, Regenera's common shares commenced trading on the Canadian Securities Exchange ("**CSE**"), under the ticker symbol "**RGEN**". (formerly "DELT"). Regenera is required to prepare an annual report on forced labour and child labour risks in supply chain and business activities to adhere to the *Act*.

The Report outlines Regenera's governance processes, existing measures, and progress made in the 2024 fiscal year to prevent and mitigate the risks of modern slavery across our supply chains. This Report is made pursuant to the *Act* and was approved by the Regenera Board of Directors ("**BOD**") on May 27, 2025.

CORPORATE STRUCTURE AND BUSINESS ACTIVITIES

Regenera owns or partially owns – CO₂ Technologies Pty. Ltd. ("CO₂ Technologies"); Carbon RX Inc. ("Carbon RX") and Methanator RX Inc. ("Methanator RX"). Regenera and each of its associated companies has its own board of directors responsible for directing and overseeing business activities.

Regenera is a clean energy technology company that is dedicated to providing a platform to incubate and develop clean technology solutions that address the Environmental Social Governance ("**ESG**") needs of corporations. The principal activity of Regenera consists of the three Regenera Group of Companies:

- 1) **MethanatorRX** Technologies Inc. ("**MethanatorRX**") - Methane Collection and Destruction;
- 2) **Carbon RX Inc.** ("**Carbon RX**") - Carbon Credit Validation, Certification, and Trading; and
- 3) **Assist Energy Solutions Corp.** ("**ASSIST**") – specializing in portable Combustion system for enhanced oil recovery.

The principal activities of the Corporation and its subsidiary originally consisted of five main clean energy pillars: 1) CO₂ capture – CO₂ capture plant process design engineering and operations consulting; 2) Customer CO₂ capture consulting as owners' engineers; 3) solvent and ethanol purification; 4) methane collection and destruction; and 5) carbon credit certification and trading (collectively the "**Business Sectors**"). These Business Sectors will be accomplished by capitalizing on the Corporation's patented process design intellectual property ("**IP**"), as well as its CO₂ capture and related solvent IP, whose focused mandate will be on positioning itself as a leading technology provider in the clean energy technology sector.

The Corporation operates its Business Sectors primarily in one principal field of business, that being clean energy. The Corporation's Chief Operating Decision-Maker ("**CODM**") is the President. CODM is the highest level of management responsible for assessing the Corporation's overall performance and making operational decisions such as resource allocations related to operations, product prioritization, and delegation of authority. Management has determined that the Corporation operates in two operating and reportable segments being 1) CO₂ Capture and 2) carbon credit validation, certification and trading, all of the Corporation's operations are within Canada.

In January 2025, the Corporation disposed of its CO2 Capture business.

GLOBAL SALES AND MARKETING LOCATIONS



REGIONAL SALES OFFICES



OPERATIONAL ACTIVITIES

Regenera is a clean energy technology company that is dedicated to providing a platform to incubate and develop clean technology solutions that address the ESG needs of corporations utilizing the following activities:





Wellhead methane, leaked from oil and natural gas production wells, is the result of fissures within the surface casing cement, and can occur in both new and old wells. Rising environmental standards have increased the regulatory focus on greenhouse gas emissions due to the fact that methane's global warming potential contributes 28 + times that of CO₂.

The desire to capture and destruct can be accomplished by methane, being captured and destructed through the conversion of methane to carbon dioxide, reducing the overall greenhouse gas impact of the producing well and can reduce the carbon intensity of the production of both oil and natural gas.

To date, operators with casing bowl methane leaks have relied on expensive remediation activities, with

costly and uncertain outcomes. This exercise includes service rigs, perforating units, cement formulators and pumping infrastructure.

Regenera's Methanator RX® is a low-cost technical solution that provides a solution to expensive remediation activities with costly and uncertain outcomes. Regenera's destruction process further provides an opportunity to convert the destroyed methane into fungible carbon credits.

Regenera will assist **MethanatorRX** is completing its field performance reviews, and its carbon credit validation and quantification audit. Upon the completion of these tasks, Regenera intends to assess the viability of acquiring an additional 5% equity interest in **MethanatorRX**, which would give Regenera a 51% equity position.



ASSIST's name stands for, and the company operates in the business of Advanced Steam System Injection Stimulation Technologies. It is advancing the commercialization of a proprietary Enhanced Oil Recovery ("EOR") process designed to recover untapped heavy oil reserves from existing or abandoned wells. At the core of this solution is the Submerged Combustion Vaporizer ("SCV") technology— a portable, high-efficiency process facility built to stimulate non-thermal wells under high-temperature conditions, producing oil with a reduced carbon footprint. The SCV technology combines a direct contact steam generator with a cycle-based EOR method that injects steam, carbon dioxide and other gasses into the reservoir, followed by a production phase. This process is designed to increase oil recovery from existing wells, to lower the carbon footprint in the production of the steam, at significantly lower costs.

ASSIST holds the exclusive worldwide license to commercialize the SCV technology. As a key step toward commercialization, **ASSIST** is currently conducting field trials of the SCV process on heavy oil wells. This phase will validate the system's performance under real-world conditions, confirming operational reliability, recovery efficiency, cost-effectiveness and carbon footprint. The technology validation process is the integration of the CO₂ that is injected into the reservoir with the steam and will demonstrate the SCV's readiness for broader deployment and support for the company's move into offering fee-for-service technology customization.

ASSIST was formed to meet the growing demand for low-cost, lower carbon, rapidly deployable EOR solutions. With up to 90% of recoverable reserves still left behind after primary production, the opportunity to sustainably stimulate thousands of abandoned and underperforming heavy oil wells across Alberta and Saskatchewan is significant. Regenera is the rightful owner of 24% of **ASSIST**, with an option to acquire an additional 26% of **ASSIST**, and intends to exercise its option in the foreseeable future. This investment will enable Regenera to contribute to the development, implementation and growth of this lower carbon recovery technology.

White Hydrogen:

Regenera's predecessor was founded on and actively involved in hydrogen reformation technologies. Naturally occurring hydrogen, found in underground deposits, is rapidly emerging as a compelling alternative to traditional hydrogen production methods. As the world accelerates its transition to net-zero emissions, white hydrogen presents a unique opportunity: a carbon-free, potentially low-cost source of hydrogen that could revolutionize the clean energy landscape. The need for white hydrogen is vast as governments and industries are pursuing aggressive decarbonization strategies, creating demand for clean hydrogen. Domestic hydrogen sources reduce reliance on imported fossil fuels and enhance energy independence, and early indicators suggest that white hydrogen could be extracted more cost-effectively than hydrogen produced via electrolysis, which makes the process that much more cost competitive.



Regenera's subsidiary **Carbon RX** IP has been historically utilized for carbon credit origination, aggregation and trading dating back to the Chicago Climate Exchange beginning 2006.

The rules and regulations today are multi-jurisdictional, have been evolving over the past 19 years, are complex and require an in-depth knowledge of how the credits are established, validated, and certified. CO₂ management experience is a pre-requisite to high fidelity, carbon credit recognition, validation, and certification.

In addition to carbon project development, **Carbon RX** was one of the cofounders of Pure Sky Registry, LLC ("**Pure Sky**"). Pure Sky, a Delaware corporation of which **CarbonRX** owns 49.9978%, is a voluntary carbon credit registry validating and issuing carbon credits utilizing WEB3 smart contracts as the basis for issuing carbon credits ("**Registry**"). The completion of the digital registry allows the free flow of digital carbon credits on the block-chain and addresses the digitization needs of **Carbon RX**.



Carbon RX developed a carbon project called the Carbon RX Canadian Prairies Cropland Project for application in regenerative agriculture that was approved in Q1, 2024 with the issuances of 85,447 carbon credits. Additional project development activities are expanding to include more regenerative agriculture lands, grazing and pasture management, and forestry.

Carbon RX continues to secure land for nature-based carbon credits with its First Nations partners and is resourcing the sales and marketing of future carbon credits. Initiatives are underway to commercialize the available credits through bilateral trade deals on credit sales, as well as securing forward offtake agreements with international buyers interested in **Carbon RX**'s pipeline of projects.

SUPPLY CHAIN

In 2024 reporting period, Regenera's supply chain consisted primarily of engineering and procuring which is executed from Canada:

- **Project Design Package ("PDP") and Modeling:** Developing a comprehensive PDP involves creating detailed plans, specifications, and models based on the clients specific parameters and requirements of the CO₂ capture project. Including process flow diagrams, equipment specifications, and instrumentation plans.
- **Engineering Time-Based Services, Technical Support, and Maintenance:** This includes providing ongoing engineering support and maintenance for CO₂ capture plants. This involves regular inspections, troubleshooting, repairs, and optimization to ensure smooth operation and efficiency.
- **Contract Labour Services:** Offering contract labour services provides flexibility in staffing for various aspects of the CO₂ capture project. This may involve hiring additional expertise for specific tasks or bringing in consultants for specialized advice or support.
- **Specialized Services and Contracting for CO₂ Capture Plant Installation:** This involves providing specialized services and contracting specifically tailored to support the installation of CO₂ capture plants. This includes site preparation, equipment installation, commissioning, and testing to ensure that the plant is installed and operational according to engineered specifications.

ADDRESSING FORCED AND CHILD LABOUR RISK IN REGENERA'S OPERATIONS AND SUPPLY CHAIN OPERATIONAL RISK

Regenera considers itself at a negligible risk exposure to forced and child labour within its operations. Reasons supporting this assessment include:

- Regenera has less than 20 employees including consultants which is a relatively a small company in terms of employee number;
- Individuals are engaged in complex field of industry that requires advanced knowledge and expertise, which is secured through direct employment contracts and consulting arrangements. This direct form of employment ensures better regulation and reduced oversight, contributing to the protection of workers' rights and the promotion of ethical labour practices.
- Regenera maintains high ethical standards with minimum exposure to forced labour and child labour due to the robust protections enforced by the Canadian and provincial labour laws. These laws are designed to safeguard workers from exploitative practices in the organizations. *The Canada Labour Code*¹ ("CLC") provides a structured approach to industrial relations, occupational health and safety for employees within federal jurisdiction. Meanwhile, the *Alberta's Employment Standards Act*² offer specific guidelines for youth employment, ensuring that young workers are granted fair pay, reasonable hours, and safe working conditions. These measures collectively contribute to Canada's low exposure to forced and child labor, reflecting the country's dedication to protecting the rights and well-being of its workforce.

SUPPLY CHAIN RISK

Key procurement and supply chain areas are outlined above. Regenera understands that identifying forced and child labour within supply chains is indeed a challenging task due to the hidden and complex nature of these practices. There may be potential risk of modern slavery practices in two key categories:

- **Offshoring:** Certain work may be conducted or outsourced by our suppliers including for corporate and support services to take advantage of lower labour costs. While this can be beneficial for suppliers seeking to reduce expenses, in some cases, suppliers may prioritize cost savings over ethical labour practices, leading them to partner with suppliers or subcontractors in Asia where labour regulations are weakly

¹ *The Canada Labour Code*

² *Alberta's Employment Standards*

enforced. This lack of oversight can make it easier for forced labour and child labour to go undetected within the supply chain.

- **Geographic Risk:** Certain regions or countries including Asia may present higher risks of forced labour and child labour practices due to various factors such as weak labour laws, corruption, poverty, and social instability. For instance, conflict-affected areas or regions with high levels of poverty may see increased incidences of forced labour as vulnerable populations struggle to make ends meet. Additionally, cultural norms and societal attitudes towards child labour can vary widely across different geographic regions, influencing the prevalence of these practices.

REGENERA'S REMEDIATION MEASURES

To mitigate the risks associated with offshoring and geographic factors, Regenera conducts thorough due diligence when selecting suppliers and subcontractors, prioritizes transparency within their supply chains, and implements robust monitoring mechanisms to ensure compliance with labour standards.

BUSINESS CODE OF CONDUCT

Implementing policies and conducting due diligence regarding forced and child labour is crucial for ethical and legal compliance, as well as for maintaining responsible and sustainable business operations. Regenera has implemented a comprehensive business code of conduct, including a Forced Labour and Child Labour Prevention Policy which includes stringent measures to prevent child labour in any part of our operations and supply chain.

RISK ASSESSMENT AND MANAGEMENT POLICY

Regenera's risk assessment and management policy clearly state the organization's zero-tolerance stance towards forced labour and child labour. It emphasizes the commitment to comply with all relevant laws and international standards pertaining to labour rights, including the prohibition of forced labour and child labour. Additionally, it articulates the organization's values and ethical principles regarding the fair and humane treatment of workers. The following key area of the risk assessment and management policy has developed a robust framework for preventing and addressing forced labour and child labour risks effectively:

- **Policy:** Policy outlines the overarching principles and objectives of the risk management process within the organization. It sets the tone for the entire policy, stating the organization's commitment to managing risks of child labour and forced labour exposure effectively.
- **Purpose:** The purpose highlights the importance of preventing forced labour and child labour within the Corporation and its supply chain. It underscores the moral imperative of respecting human rights, promoting dignity, and ensuring the well-being of workers at all levels of the organization and throughout its operations.
- **Scope:** This defines the scope of the policy in relation to forced labour and child labour risks. It encompasses not only Regenera's own operations but also its supply chain, including suppliers, contractors, and consultants. The scope also extends to any other entities or stakeholders with which the Corporation interacts, emphasizing the need for vigilance and due diligence throughout the entire value chain.
- **Responsibility:** In terms of responsibility, the policy clearly delineates the roles and obligations of all stakeholders within the organization. This includes senior management, human resources, procurement, and compliance officers. Each stakeholder understands their role in preventing and addressing forced labour and child labour risks, whether it's through risk assessment, due diligence, monitoring, or corrective action.
- **Procedures:** Finally, the procedures section outlines the specific measures and protocols that the organization will implement to deter and mitigate forced labour and child labour risks. This includes conducting risk assessments to identify vulnerable points in the supply chain, implementing supplier code

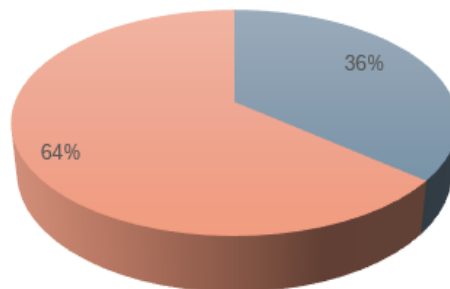
of conduct agreements, conducting audits and inspections, providing training and capacity-building for employees and suppliers.

REGENERA'S SUPPLY CHAIN ASSESSEMENT TOOLS

Regenera uses a Supplier Management Tool (“SMT”) which is a proactive approach to assess and monitor the Corporation's supplier base, especially regarding critical issues like corruption, forced labour, child labour, and anti-bribery and corruption (“ABC”) risks. This process aligns with Regenera’s risk assessment and management policies as follows:

- **Questionnaire Design:** Questionnaires sent to suppliers is a key component of risk assessment. It's designed to gather relevant information that helps determine each supplier's risk profile. Regenera includes questions about forced labour and child labour to identify potential vulnerabilities within its supply chain.
- **Risk Proofing:** Suppliers responses assist in profiling their risk levels. Suppliers who exhibit higher risks in areas such as corruption, forced labour, or child labour may require closer scrutiny and additional measures to mitigate these risks. This segmentation allows the Corporation to prioritize its risk management efforts more effectively.
- **Policy alignment:** The questionnaire also requests information from suppliers about their own policies and processes related to forced labour and child labour. This aligns with the Corporation's risk management policy, which emphasizes the importance of suppliers having robust measures in place to address these issues. It allows the Corporation to assess the alignment of supplier practices with its own values and standards.
- **Continuous Monitoring:** Beyond the initial questionnaire, the SMT facilitates ongoing monitoring of supplier performance and risk exposure which allows the Corporation to track changes in supplier risk profiles over time and take proactive measures as needed. It ensures that risk management efforts remain dynamic and responsive to evolving threats.
- **Compliance and Accountability:** Utilizing an SMT for supplier management demonstrates Regenera's commitment to compliance and accountability. By systematically assessing and monitoring supplier risks, the Corporation can demonstrate due diligence in preventing and mitigating risks such as corruption, forced labour, and child labour. This not only protects the Corporation from legal and reputational harm but also fosters trust with stakeholders.

Supplier Questionnaire Response Results



- Result of Supplier Questionnaire Response Suppliers responded
- Result of Supplier Questionnaire Response Suppliers did not respond

TRAINING AND AWARENESS

Regenera's comprehensive training program for all employees, contractors, and consultants focus on the critical issues of forced labour and child labour within our operations and supply chain. This program is designed to enhance awareness and equip our team with the knowledge and tools necessary to identify and combat these unethical practices.

Our commitment to ethical business conduct and human rights is unwavering, and this training is a significant step towards ensuring that our values are reflected throughout every level of the Corporation. By raising awareness and providing the necessary knowledge and tools, we are not only fulfilling our social responsibility but also contributing to a safer and more just working environment for all involved.

ASSESSING EFFECTIVENESS

Regenera is committed to the ethical responsibility of mitigating forced labour and child labour risks within our operations and supply chain. Our approach has been to fortify risk frameworks, ensuring they are robust enough to address and reduce the exposure to modern slavery. We have taken significant steps to enhance our understanding and capabilities in identifying potential risks of modern slavery.

In line with Canada and the *Act*, Regenera has been proactive in our efforts to comply with the reporting requirements. Our actions include rigorous supply chain analysis, third-party risk assessments, and implementing remediation measures where necessary. We believe that these efforts will not only align us with regulatory requirements but also strengthen our social responsibility and corporate governance.

We continue to assess the effectiveness of our actions and make improvements as required. Our goal is to ensure transparency and accountability in our fight against modern slavery.

Regenera's annual risk assessment policy is reviewed on a consistent basis with valuable contributions from various departments, including sustainability groups. This comprehensive review allows us to effectively investigate and monitor forced labour and child labour exposure in our operations and supply chain.

Regenera's commitment to maintaining the highest standards of integrity and transparency is further reinforced by our regular risk-based assurance activities. These include a range of measures from external independent audits to internal supply chain-focused assurances, ensuring that we stay ahead of potential risks of modern slavery and continue to operate responsibly.

REPORT APPROVAL AND ATTESTATION

In accordance with the requirements of the *Act*, we attest that we have reviewed the annual report for Regenera Insights Inc. We attest to the truthfulness, accuracy, and completeness of the contents within, reflecting due diligence for the reporting financial year ending December 31, 2024.

Signed "Marty Seymour"
Marty Seymour
 CEO

Signed "Jacelyn Case"
JACELYN CASE
 CFO