



## **2023 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**"), in our capacity of a successor to Summerland Energy Inc. ("**Summerland**").

### **Background**

Summerland was a Canadian oil and gas exploration company that was subject to the reporting requirements of the Modern Slavery Act as at January 1, 2024, when the Modern Slavery Act came into force. At this time, Summerland had entered into an agreement to sell all of its outstanding common shares to Clear North, a deal which closed on February 15, 2024 (the "**Acquisition**").

This report covers Summerland's activities during its previous financial year, being from January 1, 2023, to December 31, 2023.

### **Steps Taken During 2023**

Clear North is not aware of whether Summerland took any steps in 2023 in relation to reducing the risks of modern slavery occurring in its supply chain; however, we, as the acquirer of Summerland, are not aware of any high-risk exposure to modern slavery associated with Summerland's supply chain.

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

- **Structure:** At December 31, 2023, Summerland had 10 employees, and 4 directors, all of whom were located in Alberta. Upon close of the Acquisition, one employee from Summerland was hired by Clear North. Clear North and Summerland were amalgamated on February 15, 2024.
- **Operations:** At December 31, 2023, Summerland's active operations acquired by Clear North were all situated in Northern Alberta where Summerland was engaged in the oil and gas extraction industry. Summerland'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 Summerland 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.

### **Policies and Due Diligence**

#### ***Policies***

Summerland's Code of Conduct (the "**Code**") required 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.

#### ***Due Diligence***

Clear North is not aware of whether Summerland undertook any steps to conduct due diligence relating to mitigating the risks of modern slavery occurring in relation to its business or operations.

### **Activity and Supply Chain Risks**

Clear North is not aware of any high-risk exposure to modern slavery associated with Summerland's business or supply chains.

### **Remediation Measures**

Clear North is not aware of the existence of modern slavery in Summerland's business and the supply chains that supported its operations, nor of any remedial measures taken by Summerland.

### **Employee Training**

Clear North is not aware of whether Summerland had any employee training in place related to modern slavery.

### **Assessment of Effectiveness**

Clear North is not aware of whether Summerland had any processes in place related to the assessment of effectiveness in ensuring that modern slavery was not being used in Summerland's business or supply chains.

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

This report was approved by the Board of Directors of Clear North Energy Corp., in its capacity as successor to Summerland, on May 23, 2024 pursuant to paragraph 11(4)(a) of the Modern Slavery Act and will be filed with the Minister of Public Safety and Emergency Preparedness.

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 23, 2024

I have the authority to bind the Corporation.