



## **MODERN SLAVERY REPORT 2023**

### **Clearview Resources Ltd.**

#### **Introduction**

This modern slavery report (“Report”) is made on behalf of Clearview Resources Ltd (“Clearview”, the “Company”, “we” or “our”), an unlisted reporting issuer existing under the laws of the Province of Alberta, for the financial year ending December 31, 2023 and prepared in compliance with the *Fighting Against Forced Labour in Supply Chains Act* (Canada)(the “Act”).

Forced labour and child labour are crimes and serious violations of human rights. As a Canadian oil and gas company, Clearview recognizes the importance of ensuring its operations and the supply chains that support our operations, adhere to the highest ethical standards, including the identification and prevention of forced labour and child labour. This Report sets out steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada by Clearview or in goods or services utilized by us.

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

Clearview is an oil and natural gas company based in Calgary, Alberta and primarily engaged in the exploration and development of our oil and gas properties located in Alberta. We are primarily focused on the development of our lands within the Wilson Creek, Windfall, Northville/Pembina, Niton and Garrington areas.

The Company’s supply chain includes businesses that supply goods and services to our organization, primarily encompassing various vendors, suppliers, contractors, and subcontractors involved in the procurement of goods and services necessary for our operations in developing and maintaining our oil and gas properties.

All of Clearview’s employees and consultants are located in Canada. As of December 31, 2023, the Company had 8 employees and 2 consultants in Calgary and 10 contract operators in the field in Alberta.

Clearview’s officers, employees and directors are committed to managing and operating our business in a safe and environmentally responsible manner. Clearview’s supply chain primarily consists of suppliers and contractors who are located in Canada, although we recognize that our suppliers may supply us with goods that originate in other jurisdictions through their own supply chains. In carrying out our business, we procure goods and services from a wide range of suppliers and service providers and are committed to ensuring our contracting and procuring activities are in compliance with applicable laws and our corporate policies.

Additional information regarding the corporate structure, operations and industry conditions relating to Clearview is available in the Company’s Annual Information Form for the year ended December 31, 2023, which can be accessed on the Company’s website at [www.clearviewres.com](http://www.clearviewres.com) and on SEDAR+ at [www.sedarplus.ca](http://www.sedarplus.ca).

## **Policies and Due Diligence Processes**

Clearview requires the highest standards of professional and ethical conduct from our directors, officers, employees and consultants. We do not tolerate forced labour or child labour in any of our operations or by suppliers working with us. Our reputation among our shareholders for honesty and integrity is key to the success of our business.

Through our organizational and governance policies we communicate our values and expectations, setting a high bar for ourselves, our suppliers, and our business partners, and make it clear that we do not tolerate any forms of forced labour or child labour. Our relevant policies are discussed in further detail below:

### *Code of Conduct*

The Code of Conduct is the foundation of our company policies and sets out principles evidencing our commitment to a culture of honesty, integrity and accountability and outlines the basic principles and policies with which all employees are expected to comply. The Code of Conduct expressly requires that all directors, officers, employees and consultants comply with all applicable laws, rules and regulations of the areas in which the Company operates.

### *Whistleblower Policy*

Our Whistleblower Policy establishes procedures that encourage and protect employees and external stakeholders to confidentially and anonymously submit concerns regarding any activity that may be considered ethically, morally or legally questionable. The policy is intended to encourage reporting of wrongdoing, ensure accountability and foster transparency within the Company's operations.

Clearview is a subscriber to a third-party verification system called Complyworks. This online tracking system acts as a registry of suppliers who have been validated, including verifying the supplier's insurance coverage and their health and safety programs. Clearview uses this registry in contracting the services of a new supplier to ensure the supplier meets Clearview's minimum standards.

As a further step in our due diligence processes, Clearview aims to establish and firmly apply policies and procedures that combat forced labour and child labour risks. This may require updating the Code of Conduct and Whistleblower Policy to incorporate specific language related to forced labour and child labour risks.

## **Assessing and Managing Risk**

Clearview does not utilize forced or compulsory labour. All of the Company's employees are above the legal employment age and are recruited and provided with working conditions and the payment of wages and benefits that comply with all applicable laws and regulations.

Clearview's operations are almost entirely located in Alberta, other than one non-producing well in Saskatchewan, and our suppliers are located in Canada and the United States. As a result, we consider the overall risk of forced labour or child labour to be very low.

We do, however, acknowledge that some of our suppliers procure goods originating from outside Canada and the United States and that there may be a risk that forced labour and child labour could exist in our supply chain as it pertains to suppliers providing goods to our suppliers that originate from other countries. Further work is required to assess this risk.

## **Remediation of Forced Labour and Child Labour**

During 2023, Clearview did not identify any instances of forced labour or child labour in our operations or supply chain. As a result, we have not taken any measures to remediate any forced labour or child labour.

Our corporate policies, including the Code of Conduct and the Whistleblower Policy, provide for effective reporting of any actual or potential breach of applicable law, rules regulations or violations of our Code of Conduct. The Company acknowledges the importance of vigilance and ongoing monitoring to ensure that modern slavery risks remain mitigated within our operations and supply chains. We are committed to regularly reviewing our risk assessments and implementing any necessary remediation measures should the need arise in the future.

Clearview recognizes that efforts to prevent and reduce forced labour or child labour can unintentionally impact the income of vulnerable families. In 2023, there were no identified or reported instances which led to income loss for vulnerable families within our supply chains.

## **Training**

Clearview did not provide specific training to employees on forced labour and child labour in 2023. However, Clearview's directors, officers, employees and consultants at all levels are required to adhere to our corporate policies, including the Code of Conduct. When onboarding, all new employees are provided with the policies and are expected to review such policies and sign a statement of compliance. Clearview is committed to improving the capacity of our employees to understand, identify and manage the risks of modern slavery in our operations and across our supply chains.

In 2024, we will raise awareness and provide training to personnel regarding the Act and the strategies that will be undertaken to prevent forced labour and child labour risks.

## **Assessing Effectiveness**

Clearview does not currently have specific policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its operations and supply chains. We realize that it is our responsibility to identify and report these risks within our operations and supply chains and to continuously evaluate and refine our policies and processes to address the risks of forced labour and child labour. We will work towards developing measures to gauge the effectiveness of these policies and processes.

In our assessment of existing policies and procedures, we believe that our current practices are effective in mitigating the risk of forced labour and child labour and that these risks are minimal.

## **Approval and Attestation**

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Clearview on October 28, 2024 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. The Report is also available on the Company's website at [www.clearviewres.com](http://www.clearviewres.com).

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 Clearview. 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.

I have the authority to bind Clearview Resources Ltd.



Rod Hume  
President and Chief Executive Officer

November 6, 2024