



ABOUT THIS STATEMENT

This document constitutes the first report of Replenish Nutrients Holding Corp. (CSE: EARTH.CN) (“Report”) pursuant to section 11 of Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) for the financial year ended December 31, 2023, on the steps taken to prevent and reduce the risk that Modern Slavery (as defined below) is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada. This is a joint Report made on behalf of Replenish Nutrients Holding Corp. and its subsidiaries (the “Replenish Reporting Entities”) identified below (collectively, “Replenish”, “Company”, “we”, “us” or “our”).

Replenish Nutrients Holding Corp.

- Parent company traded on the Canadian Stock Exchange (CSE: EARTH.CN)

Replenish Nutrients Ltd.

- Operating company that manufactures and sells regenerative fertilizer products and services

EarthRenew Strathmore Inc.

- Natural gas peaking power facility generating electricity from a natural gas turbine

The information provided in this Report applies to all Replenish Reporting Entities except where noted.

INTRODUCTION

Replenish acknowledges that modern slavery can occur in many forms, including indentured servitude, human trafficking, forced labour, forced marriage, debt bondage, child labour and deceptive recruiting for labour or services (collectively, “Modern Slavery”). Replenish understands it must do its part to condemn and prevent Modern Slavery while the Act encourages Canadian entities to assess and address Modern Slavery risks in their operations and supply chain.

Replenish is committed to a responsible supply chain of business partners that share our commitment to doing business with integrity. We aim to identify Modern Slavery risks and address those risks in our supply chain and operations through a process of continuous improvement and collaboration with all relevant stakeholders across our operations.

OPERATIONAL ACTIVITIES AND SUPPLY CHAIN

Supply Chain

Replenish sources substantially all of its raw materials, supplies and manufacturing and operating equipment from Canada and the United States. For a select few pieces of equipment and some test samples of raw materials, the Company has purchased these items from China and India.

Manufacturing

Replenish is headquartered and predominately operates in Alberta, Canada. The Company currently employs local Alberta residents and abides by all federal, provincial and local labour and employment laws and regulations.



Sales

Replenish sells most of its products to Alberta-based farms and fertilizer distributors/retailers and to a lesser extent in British Columbia, Saskatchewan, and Manitoba, Canada, as well as certain states in the Pacific Northwest of the United States.

GOVERNANCE & POLICIES

Replenish strives to conduct business ethically and with integrity. To this end, the Company has a Business Code of Conduct that includes guidelines and policies for ensuring our suppliers, to the best of our knowledge, are engaged in legal and ethical business practices and do not conduct or support Modern Slavery practices. The Company also has a Whistleblower Policy that supports direct, anonymous and confidential communication with the Company's Audit Committee on items where employees, contractors or others see fit. The Company updates its policies periodically, as required, based on changes in its operating and regulatory environment.

RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Replenish has reviewed and assessed the risk of Modern Slavery in its operations and supply chains. The Company does not consider there to be a significant risk of Modern Slavery in its Canadian and U.S. operations and supply chains given the presence of strong federal, provincial, state and local labour laws in Canada and the United States.

Replenish notes there is some level of risk of Modern Slavery related to one-off purchases of a small amount of manufacturing equipment from China and one-off purchases of a small amount of raw materials used to test in its products. However, there has been no indication or evidence that any Modern Slavery practices have been present within these supply chain vendors. The Company will continue to work with and monitor any suppliers it believes pose a risk of Modern Slavery practices.

REMEDICATION OF FORCED AND CHILD LABOUR AND LOSS OF INCOME

Based on the assessment of our activities and supply chain, as described above, in 2023, there were no measures taken to remediate the loss of income to the most vulnerable families given that there was no Modern Slavery identified in our operations or supply chain.

ASSESSING EFFECTIVENESS

Replenish assesses the effectiveness of ensuring we do not have Modern Slavery in our operations and supply chains principally through our Business Code of Conduct and Whistleblower policies. Examples of activities we may use to assess the effectiveness of our actions include third-party supplier screening analysis and concerns reported through our Whistleblower communication channels. As the Company's internal processes, systems, and supply chains evolve, we will continue to take steps to monitor the effectiveness of our actions to prevent Modern Slavery in our business and supply chain.



BOARD OF DIRECTORS APPROVAL AND ATTESTATION

This Report was approved by the Board of Directors of Replenish Nutrients Holding Corp. on behalf of itself and each of the Replenish Reporting Entities.

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.

A handwritten signature in black ink, appearing to read "Neil Wiens", is positioned above a horizontal line.

I have the authority to bind Replenish Nutrients Holding Corp. and the Replenish Reporting Entities

Neil Wiens

Chief Executive Officer and Director
Replenish Nutrients Holding Corp.

May 29, 2024