

Corporate Social Responsibility Policy

At Trace Associates Inc. (Trace), all Trace employees and contractors will act as leaders during day-to-day implementation of this policy. Trace's executive management team will ensure that appropriate organizational structures are in place to effectively identify, monitor, and manage Corporate Social Responsibility issues and performance relevant to our business. Trace's objectives, targets, and performance are continuously monitored and reported yearly through the shareholder report.

Business Ethics, Transparency, and Human Rights

Trace will conduct its business in an open, honest, and ethical manner. Trace recognizes the importance of protecting all of our human, financial, physical, informational, social, environmental, and reputational assets. Trace will advise our partners, contractors, and suppliers of our Corporate Social Responsibility Policy, and will work with them to achieve consistency with this policy.

Trace will not tolerate or be involved in human rights abuses. Trace will always strive to build trust, deliver mutual advantage, and demonstrate respect for human dignity and rights in all relationships it enters into, including respect for cultures, customs, and values of individuals and groups.

Employee, Clients, and Supplier Relations

Trace will apply fair labour practices, while providing equal opportunity, and will not engage in, or tolerate, unlawful workplace conduct, including discrimination, intimidation, or harassment. Trace suppliers are part of our team and their success ultimately leads to our success. Trace is committed to treating our suppliers with respect, by being honest and looking to achieve the win-win during negotiations.

Community Investment

Trace will contribute to our host communities' quality of life by supporting six main areas including:

- family and community wellness
- environment
- education
- sports and recreation
- community enhancement
- employee support

Adopted 2011. Dated this 24th day of August 2016

A handwritten signature in blue ink, appearing to read 'Darrell J.I. Haight'.

President and CEO
Darrell J.I. Haight, B.Sc., P.Ag.

A handwritten signature in blue ink, appearing to read 'R. Smith'.

Chief Operating Officer
Rhonda L. Smith, B.Sc., P.Ag.