

All Trace Associates Inc. (Trace) employees and contractors will act as leaders during day-to-day implementation of this policy. Trace's Senior Leadership 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 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 requires that no conflict exists between the personal interests of employees/contractors and those of the Company. Trace will ensure that all employees and contractors authorized by or engaged by Trace are aware of and understand the significance of anti-bribery and anti-corruption.

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, disabilities, sexual orientation, 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 communities' by supporting: family and community wellness; environment; education; sports and recreation; community enhancement and the literary, performing, and visual arts; and employee support.

Adopted 2011. Dated this 1st day of June 2020.



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



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