Diversity, Equity, and Inclusion Policy

Our Commitment

Trace Associates Inc. (Trace) is committed to fostering and maintaining a culture of diversity, equity, inclusion, and belonging relating to every aspect of employment including recruitment, financial compensation, access to facilities, benefits, and performance management.

We embrace and safeguard our employees' differences in age, ethnicity, gender identity, language, culture, ethnicity, physical and mental ability, race, religion, marriage or civil partnership, pregnancy and maternity/paternity, and sexual orientation. We are opposed to all forms of unlawful and unfair discrimination. We recognize that diversity, equity, inclusion, and belonging help us build a stronger team and company. We will set goals, measure, and report our progress towards them.

Responsibilities

Our Director, Human Resources oversees our program and provides support to leadership to implement. Trace management leads by example and ensures we comply with applicable legislation and regulations. Managers and supervisors provide training and ongoing support to their people and address potential non-compliance issues. Our people ensure this policy is implemented across all aspects of their work at Trace, including work with suppliers and clients, and provide feedback to their supervisor or manager.

Guiding Principles

- Treat people equitably, fairly, and respectfully.
- Provide equal opportunity in every aspect of an employee's working role.
- Select employment, promotion, positions, and training based on the individual's own merits.
- Create an environment where individual differences and the different ways people contribute are recognized and valued, including representation of all groups and perspectives.
- Promote, internally and externally, greater understanding of diversity, equity, inclusion, and belonging.

Trace will take disciplinary action against those that breach this policy.

Adopted 2021. Dated this 10th day of August 2026.

Darrell J.I. Haight, B.Sc., P.Ag.
Co-founder and CEO

Jason Breakey, B.Sc., P.Ag.
President and Chief Operating Officer