

All Trace Associates Inc. (Trace) employees and contractors will work with Indigenous Peoples in a meaningful, respectful, and transparent manner and act as partners in community and business engagements. Trace's Senior Leadership Team will ensure that appropriate organizational structures are in place, to effectively identify and collaborate on Indigenous Engagement priorities and performance relevant to our business. Trace's objectives, targets, and performance are continuously monitored and reported yearly through a quarterly shareholder report.

### **Guiding Principles**

- Recognition – Trace recognizes Indigenous Peoples and their treaty rights as defined in Section 35 of the Constitution Act, 1982, which “includes Indian, Inuit, and Métis Peoples of Canada”.
- Respect – All Trace employees and consultants will work with Indigenous Peoples and their communities in a meaningful and respectful manner, including traditional language, knowledge, and traditions.
- Engagement – Trace will contribute to meaningful consultation with Indigenous Peoples and uphold the Duty to Consult.
- Collaboration – Trace actively seeks to work with and engage new business opportunities with Indigenous Peoples, including business development and employment.

### **Indigenous Peoples' Employment and Training**

Trace looks for opportunities within local Indigenous communities by consulting with the client's community relations team to establish relationships with Indigenous contractors. Trace's project management process includes early dialogue and planning to allow Indigenous contractors to secure equipment, staff, and necessary expertise to safely perform the work. We work collaboratively throughout the project to ensure the success of projects, and more importantly to build new and grow existing relationships. Trace builds relationships with Indigenous communities that foster and facilitate on-the-job training and mentoring, especially with health and safety management.

### **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 our human, financial, physical, informational, social, environmental, and reputational assets. Trace will advise our partners, contractors, and suppliers of our Indigenous Peoples' Engagement Policy, and will work with them to achieve consistency with this policy. We are committed to measuring, auditing, and reporting performance on its Indigenous Peoples' Engagement Policy. 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.

Adopted 2015. 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.