Indigenous Peoples' Engagement Policy

All Trace Associates Inc. (Trace) employees and contractors work with Indigenous Peoples and communities in a meaningful, respectful, and transparent manner and act as partners in community and business engagements. Trace's Senior Leadership Team ensure that appropriate organizational structures are in place to effectively identify and collaborate on Indigenous Engagement priorities relevant to our business. Trace's Principal, Indigenous Advisory oversees our program and supports senior leaders in implementation. The President and Chief Operating Officer ensure Trace has the resources to implement this program. 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".
- **Reconciliation:** Trace is committed to reconciliation with Indigenous Peoples based on recommendations from the Truth and Reconciliation Commission, Call to Action No. 92.
- **Respect:** All Trace employees and consultants work with Indigenous Peoples and communities in a meaningful and respectful manner, including traditional language, knowledge, and traditions.
- **Engagement:** Trace contributes to meaningful consultation with Indigenous Peoples and upholds 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 works with local Indigenous communities 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 conducts business in an open, honest, and ethical manner. Trace advises our partners, contractors, and suppliers of our Indigenous Peoples' Engagement Policy and works with them to achieve consistency with this policy. We are committed to measuring, auditing, and reporting performance on our Indigenous Peoples' Engagement Policy. Trace builds trust, delivers mutual opportunities, and demonstrates respect for human dignity, equality, and rights in all relationships it enters, including respect for cultures, customs, and values of individuals and groups, as stated in Article 2 of United Nations Declaration on the Rights of Indigenous Peoples.

Adopted 2015. 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