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1. Online questionnaire

Entities and government institutions must ensure that the information provided in the questionnaire is consistent with the information provided in their report(s).

Entities and government institutions will be asked to confirm that they have read and understand the information in the data management disclaimer and privacy notice statement included at the beginning of the questionnaire. Entities and government institutions will also be asked to provide the name, title and email address of the person authorized to fill out the questionnaire. Public Safety Canada may use the contact information provided should it require additional details regarding the submission.

The questionnaire may be used as a resource for the report. The questions found within the questionnaire can be viewed at any time without launching the questionnaire. Entities and government institutions may easily refer to the information as they prepare their report:

▼ View questions

This list can support entities in preparing for their submission. Once ready, entities can submit a questionnaire through the online form.

Identifying information

Questions marked with an asterisk (*) are mandatory.

1. *This report is for which of the following? (Required)

- ◆ Entity
- ◆ Government institution

2. *Legal name of reporting entity or government institution

Tiercon Corp.

3. *Financial reporting year

Start Date – January 1, 2023

End Date – December 31, 2023

4. *Is this a revised version of a report already submitted this reporting year? (Required)

- Yes

No

4.1 *If yes, identify the date the original report was submitted. (Required)**4.2 *Describe the changes made to the original report, including by listing the questions or sections that were revised (1,500 character limit). (Required) N/A****5. For entities only: Business number(s) (if applicable):****6. For entities only: *Is this a joint report? (Required)**

- Yes •

- **No**

6.1 *If yes, identify the legal name of each entity covered by this report.**6.2 Identify the business number(s) of each entity covered by this report (if applicable).**

7. For entities only: *Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Required)

- Yes •

No

7.1 *If yes, indicate the applicable law(s). Select all that apply. (Required)

- The United Kingdom's *Modern Slavery Act 2015*
- Australia's *Modern Slavery Act 2018*
- California's *Transparency in Supply Chains Act*
- Other, please specify:

8. For entities only: *Which of the following categorizations applies to the entity? Select all that apply. (Required)

- Listed on a stock exchange in Canada
- Canadian business presence (select all that apply):
 - Has a place of business in Canada - Yes
- Does business in Canada Yes
- Has assets in Canada Yes
 - Meets size-related thresholds (select all that apply):
 - Has at least \$20 million in assets for at least one of its two most recent financial years Yes
 - Has generated at least \$40 million in revenue for at least one of its two most recent financial years Yes
 - Employs an average of at least 250 employees for at least one of its two most recent financial years Yes

9. For entities only: *Which of the following sectors or industries does the entity operate in? Select all that apply. (Required)

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction •
- Utilities
- Construction
- Manufacturing Yes
- Wholesale trade •
- Retail trade
- Transportation and warehousing

- Information and cultural industries •

Finance and insurance

- Real estate and rental and leasing
- Professional, scientific and technical services •

Management of companies and enterprises

- Administrative and support, waste management and remediation services •

Educational services

- Health care and social assistance •
- Arts, entertainment and recreation •
- Accommodation and food services
- Other services (except public administration) •
- Public administration
- Other, please specify:

10. For entities only: *In which country is the entity headquartered or principally located? (Required) Canada

10.1 If in Canada: *In which province or territory is the entity headquartered or principally located? (Required) Ontario

11. For government institutions only: *Is this a report for a federal Crown corporation or a subsidiary of a federal Crown corporation? (Required)

- Yes
- No
- NA

11.1 *If yes, which of the following sectors or industries does the Crown corporation or subsidiary operate in? Select all that apply. (Required)

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction •
- Utilities
- Construction
- Manufacturing
- Wholesale trade •
- Retail trade
- Transportation and warehousing
- Information and cultural industries •
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services •
- Management of companies and enterprises

- Administrative and support, waste management and remediation services ●

Educational services

- Health care and social assistance ●

Arts, entertainment and recreation

Accommodation and food services

- Other services (except public administration) ●

Public administration

- Other, please specify:

11.2 *If yes, in which province or territory is the Crown corporation or subsidiary headquartered or principally located? (Required)

Annual Report

Reporting for entities

1. *What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Required)

- Mapping activities **No**
- Mapping supply chains **No**
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains **Yes**
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains **No**
- Developing and implementing an action plan for addressing forced labour and/or child labour **Yes**
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily **Yes**

- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour **Yes**
- Developing and implementing due diligence policies and processes for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains **Yes**
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour **Yes**
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains **No** [our language says expected not required]
- Developing and implementing child protection policies and processes **Yes**
- Auditing suppliers **Yes**
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour **No**
- Developing and implementing grievance mechanisms **Yes**
- Developing and implementing training and awareness materials on forced labour and/or child labour **Yes**
- Developing and implementing procedures to track performance in addressing forced labour and/or child labour **Yes**
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour **Yes**
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour **No**
- Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks **No**
- Information not available for this reporting period

Other, please specify:

2. Please provide additional information describing the steps taken (if applicable) (1,500-character limit).

In 2023, Tiercon took the following steps to prevent and reduce the risk that forced labour or child labour is used at any step in manufacturing products in Canada or goods imported into Canada.

Tiercon conducted two focused supplier surveys in 2023. One survey explicitly focused on child and forced labour, and the second, while also focused on sustainability, included questions on child and forced labour. Tiercon sent the surveys to all of Tiercon's higher-risk suppliers, requesting confirmation and information regarding suppliers' practices and due diligence relating to forced and child labour. Tiercon designed the surveys to ensure that suppliers were upholding Tiercon's Sustainability Guidelines for Suppliers and its Integrity Code while demonstrating their commitment to these principles.

Tiercon's Whistleblower and Anti-Retaliation Policy and its Integrity Code expect all employees to report any wrongdoing or ethical concerns including but not limited to violations of the law, and breach of policy.

The surveys focused on worker and safety rights by assessing and confirming these and other factors.

- a. Labour is voluntary;
- b. Workers are adequately compensated;
- c. Workers are not exploited;
- d. Facilities comply with applicable employment standards (including minimum wage);
- e. Working hours are consistent with local laws and regulations;
- f. Facilities meet health and safety laws;

While the survey results did not raise any forced or child labour concerns, Tiercon has not been complacent. Tiercon has incorporated these results into its supplier scorecards, a testament to its commitment to ongoing due diligence and supplier development.

Tiercon also conducted an internal client audit of its hiring practices, concentrating on forced and child labour. The audit did not identify any areas of particular concern. Tiercon did, however, add age verification through its onboarding process, checklist, and internal human resources information system.

In 2023, Tiercon launched mandatory training on forced and child labour training during its onboarding process.

3. *Which of the following accurately describes the entity's structure? (Required)

- Corporation Yes

Trust

- Partnership
- Other unincorporated organization

4. *Which of the following accurately describes the entity's activities? Select all that apply. (Required)

● Producing goods (including manufacturing, extracting, growing and processing) Yes

● in Canada Yes

- outside Canada

Selling goods

○ in Canada Yes

○ outside Canada

Yes Distributing goods

○ in Canada

○ outside Canada

● Importing into Canada goods produced outside Canada Yes

● Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

5. Please provide additional information on the entity's structure, activities, and supply chains (1,500-character limit).

Headquartered in Stoney Creek, Ontario, Tiercon Corp. is a manufacturer of plastic and plastic-metal automotive integrated parts. It has four production facilities, including more than 400,000 sq. ft. of industrial space, staffed by more than 600 skilled employees.

Tiercon's products are manufactured in Canada. The Tiercon Corp. supply chain consists of resins for injection moulding, paint for automotive component painting, steel for stamped components, and aluminum for stamped and extruded automotive components. Most of these materials are provided by suppliers with whom Tiercon has long-term contracts and are sourced mainly from Canada and the United States, though Tiercon does source some of its materials from China, Germany, and Mexico.

6. *Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

● Yes

● No

6.1 *If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

- Embedding responsible business conduct into policies and management systems Yes
- Identifying and assessing adverse impacts in operations, supply chains and business relationships Yes
- Ceasing, preventing, or mitigating adverse impacts Yes
- Tracking implementation and results Yes
- Communicating how impacts are addressed No
- Providing for or cooperating in remediation when appropriate No

7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour

Through its formal policies, and codes of conduct for employees and suppliers, Tiercon strives to uphold the rights of its employees, as well as many workers across its supply chain. Tiercon is committed to protecting human rights. Tiercon's commitment to human rights is supported by its Integrity Code, Sustainability Guidelines, Conflict Minerals Policy and its Whistleblower and Anti-Retaliation Policy.

Integrity Code ("Code")

Tiercon's Integrity Code reflects its core values which includes upholding human rights laws. Through its Code, Tiercon reinforces its commitment to child and forced labour. All employees are expected to comply with the Code and are encouraged to communicate openly regarding all working conditions without fear of harassment or reprisal. The Code also forms part Tiercon's on-boarding process.

Sustainability Guidelines for Suppliers ("Guidelines")

Tiercon's supplier relationships are guided by its Sustainability Guidelines for Suppliers which apply to both domestic and foreign companies which supply materials to Tiercon. The Guidelines assert that Tiercon is committed to recognizing human rights and labour principles throughout its organization and supply chain and that it expects its suppliers and sub-suppliers to develop policies for all their facilities to ensure working conditions comply with local laws in support of Tiercon's core principles.

The Guidelines also set out that the use of child labour shall not be tolerated and prohibits all suppliers from employing any person below the legal age for employment in accordance with the applicable local law. The Guidelines also state that suppliers will not use forced or involuntary labour of any kind or tolerate physical abuse in any way. Suppliers are expected to have the tools in place to prevent, identify and resolve unacceptable employee treatment such as harassment, discrimination, physical or mental punishment, or other forms of intimidation or abuse.

Suppliers are also obligated to recognize an employee right to representation by trade union and are obligated to promote a safe and healthy workplace for all their employees with a continued commitment.

Suppliers must comply with applicable laws regulating working hours and wages including minimum wage, overtime, rest periods and must provide legally mandated benefits. The Guidelines explicitly set out Tiercon's commitment to increase awareness and mitigate forced labour and human rights violations by identifying and sharing data and with suppliers. The Guidelines contain resources which suppliers are expected to cascade to their employees and their own global supply network.

Suppliers are required to uphold the highest standards of integrity and to conduct business with honesty and fairness throughout the supply chain in full compliance with all applicable laws, regardless of where they do business. Suppliers are expected to work against corruption in all its forms, including extortion and bribery.

Conflict Minerals Policy

As a socially responsible company, Tiercon has concern for the well-being of people and communities and through its Conflict Minerals Policy supports the efforts of human rights organizations to end violence and atrocities in Central Africa (the Democratic Republic of Congo (DRC) and other adjoining countries: Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda.

Whistleblower and Anti-Retaliation Policy

Tiercon supports a work environment in which its employees and other stakeholders are encouraged to report legal and ethical concerns without fear of retaliation. This Whistleblower Policy is intended to encourage and enable all employees and any other stakeholders including suppliers to report any credible concerns regarding ethical and legal issues so that Tiercon can address and correct inappropriate conduct and actions.

It is contrary to Tiercon's values for anyone to retaliate against any employee or stakeholder who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any of its other policies.

8. *Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)

- Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.
- Yes, we have started the process of identifying risks, but there are still gaps in our assessments – **Yes**
- No we have not started the process of identifying risks.

8.1 *If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Required)

- The sector or industry it operates in
 - The types of products it produces, purchases or distributes •
 - The locations of its activities, operations or factories
 - The types of products it sources
- The raw materials or commodities used in its supply chains** Yes
- Tier one (direct) suppliers
 - Tier two suppliers
 - **Tier three suppliers** Yes
 - **Suppliers further down the supply chain than tier three** Yes
 - The use of outsourced, contracted or subcontracted labour •
 - The use of migrant labour
 - The use of forced labour •
 - The use of child labour
 - None of the above
 - Other, please specify

9. *Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Required)

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction •
- Utilities
 - Construction
 - **Manufacturing** Yes
 - Wholesale trade •
- Retail trade
 - Transportation and warehousing
 - Information and cultural industries •
- Finance and insurance
 - Real estate and rental and leasing
 - Professional, scientific and technical services •
- Management of companies and enterprises
 - Administrative and support, waste management and remediation services •
- Educational services
- Health care and social assistance • Arts, entertainment and recreation •

Accommodation and food services

- • Other services (except public administration) • Public administration
- None of the above
- Other, please specify

10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500-character limit).

As stated in Question 2, Tiercon has identified some risks regarding child and forced labour in the supply chain through its internal customer audit and supplier surveys. Tiercon is committed to strengthening its processes through continued stakeholder engagement and development.

11. *Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)

- Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.
- **Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.** Yes

11.1 *If yes, which remediation measures has the entity taken? Select all that apply. (Required)

- Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support
- Compensation for victims of forced labour or child labour and/or their families
- Actions to prevent forced labour or child labour and associated harms from reoccurring •

Grievance mechanisms

- Formal apologies
- Other, please specify.

N/A

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).

13. *Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Required)

- Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.
- Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains. NA

14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable) (1,500 character limit). N/A

15. *Does the entity currently provide training to employees on forced labour and/or child labour? (Required)

Yes

No

15.1 *If yes, is the training mandatory? (Required)

- Yes, the training is mandatory for all employees. Yes
- Yes, the training is mandatory for employees making contracting or purchasing decisions. • Yes, the training is mandatory for some employees.
- No, the training is voluntary.

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500-character limit).

The Integrity Code forms part of Tiercon's onboarding process and is mandatory for all new hires. The Code contains express language that addresses child and forced labour and upholds ethical business standards. All employees are expected to comply with the Code and are encouraged to communicate openly regarding all working conditions without fear of harassment or reprisal. Employee signoff is conducted as part of this onboarding training. In addition, Tiercon's Sustainability Steering Committee members have attended various focused training sessions on child and forced labour provided by the Automotive Industry Action Group ("AIAG") and its customers.

17. *Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Required) – Yes

- Add if any other plans in the near future or other initiatives?

17.1 *If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Required)

- Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour
- Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
- Partnering with an external organization to conduct an independent review or audit of the organization's actions
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators **Yes**

18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).

Since Tiercon conducted its initial supplier surveys, follow-up onsite supplier development audits at suppliers have been initiated. In addition, Tiercon has revised its supplier scorecard to include a sustainability score. Tiercon also aims to expand its supplier surveys deeper into its supply chain.

Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I make this attestation in my capacity as Vice President and General Manager of Tiercon Corp. and on behalf of its senior management team.

Dated this 29 of May 2024.

Tiercon Corp.

Per: 

I have authority to bind the Corporation

Date modified:

2024-03-20