

## **1.0 Purpose**

Tiercon Corp. (the “Company”) supports a work environment in which our 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 to report any credible concerns regarding ethical and legal issues so that the Company can address and correct inappropriate conduct and actions. It is important that legal and ethical concerns be identified and resolved at the earliest possible opportunity.

## **2. Scope**

This Policy applies to all Tiercon employees and other stakeholders, including the Company’s customers, suppliers, and contractors. It is the responsibility of all employees to report concerns about violations of Company’s Integrity Code or suspected violations of the law or other Company policies.

## **3. No Retaliation**

It is contrary to the Company’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 the Company’s other policies. Employees who retaliate against an individual who has reported a violation in good faith will be subject to discipline up to and including termination of employment.

## **4. Examples of Retaliation**

Retaliation can take many forms and can include subtle action. Suspected instances of retaliation should be reported to the Company’s Director Human Resources who may be reached by email at [cgeorge@tiercon.com](mailto:cgeorge@tiercon.com) or by telephone at 905-656-2268. Examples of retaliation may include and are not limited to:

- Reduction, addition or change of duties or hours.
- Verbal abuse or conduct intended to embarrass or humiliate an employee.
- Physical abuse or threats.
- Termination, demotion or suspension, or threats to take any such action.
- Denial of a promotion increase in wages, assignment, transfer, or overtime opportunities.
- Other actions advise to Tiercon’s Integrity Code.

## **5. Reportable Matters**

Reportable matters are deemed serious wrongdoing by the Company, the Company employees, or other stakeholders who are acting on the Company’s behalf. Reportable matters include but are not limited to the following:

- Dishonest, corrupt, or illegal activities including anti-competitive behaviour.

- Theft, fraud, money laundering or misappropriation or fraudulent misrepresentation of financial data.
- A serious breach of the Company's policies or procedures.
- Interference with or breach of the Company's information security policies or procedures.
- Offering or accepting a bribe.
- Misuse of Company funds or property in a manner that falls within the scope of this Policy.
- Damage/sabotage, violence, drug & alcohol abuse in a manner which threatens damage to property.
- Behaviour that may cause risk to the health and safety of other employees.
- Illegal activity or other unethical conduct.
- Bullying, discrimination, harassment, or abuse.
- Reprisal for having participated in an investigation.

## **6. Reporting Procedure**

Employees are encouraged to communicate their questions, concerns, suggestions or complaints to their manager or supervisor. In circumstances where an employee is not comfortable speaking to his or her direct manager or supervisor or is not satisfied with their supervisor's response, he or she is encouraged to speak with the Director of Human Resources. Complaints may be made anonymously and while not preferred (in order to allow a full and complete investigation) when this occurs the complaint will nonetheless be treated with the utmost seriousness.

Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Director of Human Resources who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisors. The Company's Director of Human Resources is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved.

External stakeholders can report any ethical or legal concerns directly to the Company's Director of Human Resources.

## **7. Investigation Procedure**

All complaints made under this Policy will be investigated promptly and thoroughly. Confidentiality of all matters relating to the investigation shall be maintained to the extent possible while ensuring the integrity of the investigation and compliance with all applicable laws.

## **8. Accounting and Auditing Matters**

Where applicable, the Company's Director of Human Resources will immediately notify the Company's CFO or a Co-President of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work until the matter is resolved.

## **9. Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

#### **10. Confidentiality**

Violations or suspected violations will be submitted on a confidential basis by the complainant.

Reports of violations or suspected violations will be kept confidential to the extent possible,

consistent with the need to conduct an adequate investigation. However, the identity of anyone making a complaint under this Policy will be kept confidential to all persons other than the receiver of the complaint and the investigator (other than if the complaint is made anonymously in which case the identity of the complainant will not be known).

#### **11. Handling of Reported Violations**

The Company's Director of Human Resources will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.