



Thank you for submitting your annual report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Below is a summary of your responses

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Forced labour in Canadian supply chains: submit a questionnaire

Data Management Disclaimer

Entities and government institutions must complete this questionnaire if they have reporting obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act). If an entity or government institution is unsure whether they are required to report, refer to guidance on [how to prepare a report](#).

Entities must have their completed report approved by the appropriate governing body or bodies.

Completing this questionnaire, including attaching the PDF version of the entity's or government institution's report, is mandatory. The questionnaire is considered complete if all of the mandatory fields have been filled out and a report has been uploaded that meets all of the following requirements:

- Contains information addressing each of the legal requirements in subsections 6(1) and 6(2), for government institutions, or in subsections 11(1) and 11(3), for entities;
- For entities, has received the necessary approvals and includes the signed attestation;
- Does not exceed 10 pages in length, or 20 pages for reports provided in both Canadian official languages; and
- Is a PDF file that does not exceed 100MB in size.

For more information, please refer to the [guidance](#).

Failure to complete the questionnaire is considered an offence under subsection 19(1). All offences under subsections 19(1) and 19(2) are punishable on summary conviction and a fine of

not more than \$250,000. The questionnaire must be completed using information from activities undertaken during the entity's or government institution's previous financial year before the reporting deadline of May 31, 2024.

There is no prescribed level of detail required for the responses. Entities and government institutions should use discretion in determining the appropriate level of detail proportionate to the size and risk profile of the entity or government institution.

Knowingly making a false or misleading statement or providing false or misleading information in the questionnaire responses or in the report is considered an offence under subsection 19(2).

Questionnaire responses will be stored by Public Safety Canada and will be disposed of in accordance with the Policy on Service and Digital, the *Access to Information Act*, the *Privacy Act* and the *Library and Archives Act*. The report itself will be added to the Public Safety Library's collection and will be subject to the Public Safety Canada Library Collection Development Policy. Public Safety Canada may proceed with the manipulation or translation of answers to align the bibliographical data of the report to Treasury Board Secretariat Standard on Metadata and Public Safety Canada Library cataloguing and description procedures.

Entities and government institutions are also required to publish their report in a prominent place on their website, in accordance with section 8, for government institutions, and subsection 13(1), for entities. Learn more on [how to prepare a report](#)

An entity's failure to publish a report in a prominent place on its website is considered an offence under subsection 19(1).

Entities must complete the questionnaire and submit their report in one of the two Canadian official languages. It is recommended, however, that reports be submitted in both English and French, in order to make reports accessible to the broader Canadian public. Requests for translated copies of reports may be directed to the responsible entity.

Government institutions may complete the questionnaire in either official language, but are required to submit the PDF version of their report in both English and French, as per the *Official Languages Act*.

Privacy Notice Statement

Personal information is collected by Qualtrics on behalf of Public Safety Canada for the purpose of verifying information contained in reports submitted under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act).

Participation in this questionnaire is mandatory for entities and government institutions that are required to report under the Act. Please note that information entered in any open text box field

required to report under the Act. Please note that information entered in any open text box field could be deemed identifiable depending on the information provided. In order to protect privacy, entities and government institutions must not add personal information of any kind in these open text areas.

Personal information will be managed and administered in accordance with the *Access to Information Act*, the *Privacy Act* and any other applicable laws. Public Safety Canada may use the personal information provided in the questionnaire responses for policy development purposes, but the information may also be used for investigative purposes.

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You have the right to the protection of, access to and correction of your personal information. Find instructions for obtaining information through [Public Safety Canada Access to Information and Privacy \(ATIP\)](#).

Any questions, comments, concerns or complaints you may have regarding Public Safety Canada's handling of your personal information may be directed to our Access to Information and Privacy Coordinator by emailing atip-aiprp@ps-sp.gc.ca. If you are not satisfied with Public Safety Canada's response to your privacy concern, you have the right to file a complaint with the [Privacy Commissioner of Canada](#) regarding the institution's handling of your personal information.

**I have read and understand the information above.*



Identifying Information

Please note that information entered in any open text box field could be deemed identifiable depending on the information provided. In order to protect privacy, entities and government institutions must not add personal information of any kind in these open text areas.

***This report is for which of the following?**

Entity



Government institution



***Legal name of reporting entity or government institution:**

Tiercon Corp.

Characters remaining: 987

***Financial reporting year (Start Date):**

Month

January

Day

1

Year

2023

***Financial reporting year (End Date):**

Month

December

Day

31

Year

2023

***Is this a revised version of a report already submitted this reporting year?**

Note: If yes, the previous version will be deleted and users will be unable to recover the previously submitted version.

Yes

No

Business number(s) (if applicable):

821946076

Characters remaining: 990

***Is this a joint report?**

Yes

No

***Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?**

Yes

No



***Which of the following categorizations applies to the entity? Select all that apply.**

Listed on a stock exchange in
Canada



Canadian business presence (select all that apply):

Has a place of business in
Canada



Does business in
Canada



Has assets in
Canada



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



Has generated at least \$40 million in revenue for at least one of its two most recent
financial years



Employs an average of at least 250 employees for at least one of its two most recent
financial years



***Which of the following sectors or industries does the entity operate in?
Select all that apply.**

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:

***In which country is the entity headquartered or principally located?**

Canada

***In which province or territory is the entity is headquartered or principally located?**

Ontario

Annual Report

***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.**

Mapping activities

Mapping supply chains

Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

Developing and implementing an action plan for addressing forced labour and/or child labour

Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily

Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour

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

Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour

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

Developing and implementing child protection policies and processes

Developing and implementing anti-forced labour and/or -child labour contractual

Developing and implementing anti-forced labour and/or -child labour contractual clauses

Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists

Auditing suppliers

Monitoring suppliers

Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour

Developing and implementing grievance mechanisms

Developing and implementing training and awareness materials on forced labour and/or child labour

Developing and implementing procedures to track performance in addressing forced labour and/or child labour

Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour

Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks

Information not available for this reporting period

Other, please specify:

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.

Please provide additional information describing the steps taken (if applicable) (1500 character limit).

See previous page

Characters remaining: 1483

***Which of the following accurately describes the entity's structure?**

Corporation



Trust



Partnership



Other unincorporated organization

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

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

in
Canada

outside
Canada

Selling goods

in
Canada

outside
Canada

Distributing goods

in
Canada

outside
Canada

Importing into Canada goods produced outside
Canada

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

***Has the organization identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

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.

No, we have not started the process of identifying risks.

Please provide additional information on the organization's structure, activities and supply chains (1500 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.

Characters remaining: 745

***Does the organization currently have policies and due diligence processes in place related to forced labour and/or child labour?**

Yes

No

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

Embedding responsible business conduct into policies and management systems

Identifying and assessing adverse impacts in operations, supply chains and business relationships

Ceasing, preventing or mitigating adverse impacts

Tracking implementation and results

Communicating how impacts are addressed

Providing for or cooperating in remediation when appropriate

Please provide additional information on the organization's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1500 character limit).

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.

Characters remaining: 1088

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

The sector or industry it operates in

The types of products it produces, sells, distributes or imports

The locations of its activities, operations or factories

The types of products it sources

The raw materials or commodities used in its supply chains

Tier one (direct) suppliers

Tier two suppliers

Tier three suppliers

Suppliers further down the supply chain than tier three

The use of outsourced, contracted or subcontracted labour

The use of migrant labour

The use of forced labour

The use of child

The use of child labour

None of the above

Other, please specify:

***Has the organization 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.**

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

None of the above

Other, please specify:

Please provide additional information on the parts of the organization's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the organization has taken to assess and manage that risk (if applicable) (1500 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.

Characters remaining: 1216

***Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

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.

Please provide additional information on any measures the organization has taken to remediate any forced labour or child labour (if applicable) (1500 character limit).

***Has the organization 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?**

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.

Please provide additional information on any measures the organization 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) (1500 character limit).

***Does the organization currently provide training to employees on forced labour and/or child labour?**

Yes

No



***If yes, is the training mandatory?**

Yes, the training is mandatory for all employees.



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.



Please provide additional information on the training the organization provides to employees on forced labour and child labour (if applicable) (1500 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.

Characters remaining: 830

***Does the organization currently have policies and procedures in place to**

Does the organization 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?

Yes



No



***If yes, what method does the organization use to assess its effectiveness?
Select all that apply.**

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



Other, please specify:



Please provide additional information on how the organization assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable) (1500 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

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.

Characters remaining: 1192

***Upload report (Required) (100MB limit):**

Upload your report, including the signed attestation, in PDF format

Tiercon.Forced Labour in Canadian Supply Chains May 2024 Submission.pdf

12.6 MB

application/pdf

Upload report in second Canadian official language (Optional) (100MB limit):

Upload your report, including the signed attestation, in PDF format

Drop files or click here to upload

* I confirm that the attached report is approved and attested, as required under subsection 11(4) and subsection 11(5) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act



Net.

***Please identify the name, title and email address of the person authorized to fill out this questionnaire.**

(Note: Public Safety Canada may use the contact information provided should it require additional details regarding the submission. Info will be used as per the privacy note statement.)

Name:

Craig George

Title:

Director of Human Resources

Email
address:

cgeorge@tiercon.com

***Do you wish to submit your responses to this questionnaire? (If you wish to amend your answers, please click the "Previous" button.)**

Yes

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