

# U.S. Equal Employment Opportunity and Anti-Harassment Policy

Consistent with our dream of creating an environment in which we enjoy working together, CGI is committed to fostering and maintaining professional workplaces that respect the dignity of all members. Respect is one of our core values, and by respecting our fellow members we can ensure that our company remains a diverse and satisfying place to work.

## EEO PRINCIPLES

CGI Technologies and Solutions Inc. and CGI Federal Inc. (collectively herein “CGI”) are committed to the principles of equal employment opportunity and to compliance with the law. It is CGI's policy to provide equal employment opportunity and to make all employment-related decisions without regard to race, ethnicity, ancestry, color, sex, religion, creed, age, national origin, citizenship status, disability, pregnancy, medical condition, military and veteran status, marital status, sexual orientation or perceived sexual orientation, gender, gender identity, and gender expression, familial status, political affiliation, genetic information, or any other legally protected status or characteristics. This policy applies to recruitment, hiring, training, promotion, and all other personnel actions and conditions of employment such as compensation, layoffs and reinstatements, training, tuition assistance, and disciplinary measures. CGI ensures that all employment decisions are based only on valid job requirements.

CGI's U.S. policies and actions seek to ensure that no discriminatory practice exists. CGI also makes its recruiting sources aware of this policy and will terminate relationships with any organization that refuses to subscribe to the same principles.

By this policy, CGI wishes to ensure that all members have the opportunity to make their maximum contribution to CGI and to their own career goals. The intention behind this policy is to provide equal employment opportunity that will simultaneously serve the requirements of society, the law, sound business practices, and individual dignity.

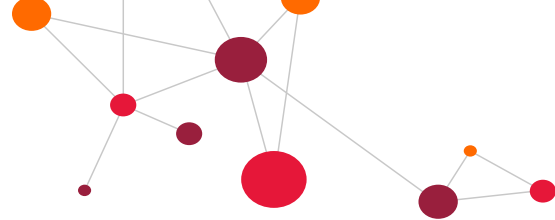
Please access the U.S. State & Local Required Labor Law Posters on CGI's Intranet for a list of additional required state notices that may be applicable to your work location.

## SCOPE

This policy is applicable to all members, applicants, partners, vendors/suppliers, and clients at any time when engaging in any CGI business, whether the interaction occurs (a) at the Workplace or outside the Workplace; and (b) during work hours or outside of work hours.

## ANTI-HARASSMENT

CGI strives to provide a work environment free of discrimination and harassment. CGI therefore prohibits harassment on the basis of race, ethnicity, ancestry, color, sex, religion, creed, age, national origin, citizenship status, disability, pregnancy, protected veteran status, marital status, sexual orientation or perceived sexual orientation, gender identity, familial status, political affiliation, genetic information, or any other legally protected status or characteristic. CGI's commitment to a harassment-free work environment bars not only harassment by all members, but also harassment by third parties whom CGI members encounter on the job, such as clients, consultants or vendors. Behavior prohibited by this policy includes any physical, verbal, or written (including social media) conduct that creates an intimidating, hostile, or offensive working environment.



Harassment can take many forms. Some examples of impermissible harassment include, but are not limited to:

- Making fun of a member's religious beliefs;
- Using racially biased epithets;
- Engaging in derogatory stereotypes related to a person's gender or sexual orientation;
- Circulating demeaning or degrading jokes or cartoons via CGI's email system;
- Making derogatory statements based on someone's traditional ethnic hairstyle;
- Making negative assumptions of an individual based on a particular political party affiliation;
- Using social media to post offensive statements regarding individuals;
- Referring to foreign national members using derogatory stereotypes.

Members and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

- (a) filing a complaint;
- (b) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of the affirmative action provisions of section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"), or the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("VEVRAA"), or any other Federal, state, or local law requiring equal opportunity for qualified protected veterans or individuals with disabilities; or
- (c) opposing any act made unlawful by Section 503, VEVRAA, or their implementing regulations, or any other Federal, state, or local law requiring equal opportunity for individuals with disabilities or protected veterans; or
- (d) exercising any other right protected by Section 503, VEVRAA, or their implementing regulations.

Sexual harassment also is illegal and contrary to CGI policy. CGI prohibits any member from making unwelcome and unsolicited sexual advances or requests for sexual favors, or engaging in other verbal or physical conduct of a sexual nature when submission to such conduct is to create influence over another person or is explicitly conditioned as a term or condition of a member's employment, or submission to or rejection of such advances or requests is used as a basis for employment decision affecting the member, or when any such conduct or other gender-based behavior creates an intimidating, hostile, or offensive working environment.

Examples of sexual harassment conduct prohibited by CGI include, but are not limited to:

- Pressuring a member to submit to sexual demands as a condition of continued employment, or promising job benefits in return for sexual favors.
- Unwelcome physical touching of another CGI member.
- Accessing pornographic internet sites while at work.
- Displaying sexually explicit materials in the workplace.
- Discussing one's sexual activities or inquiring into those of a coworker.
- Leering or whistling at a coworker, or making suggestive or insulting gestures or comments.



## MANAGEMENT RESPONSIBILITIES

While all members are responsible for adhering to every aspect of this policy, CGI managers are personally accountable for enforcement and must make every effort to prevent discriminatory or harassing behavior and to intervene immediately if they observe a problem or if a problem is reported to them. Managers are responsible for bringing all CGI employment policies to the attention of their subordinate supervisors and members. In the event that a manager becomes aware, either through the manager's own observation or via complaint, that discriminatory conduct — including harassment — may have occurred, the manager is to report this immediately to the Vice President of his or her business unit and to the assigned Human Resources Business Partner.

## COMPLAINT PROCEDURE

Any person who feels discriminated against or harassed can and should, in all confidence and without fear of reprisal, personally report the facts to their manager, their assigned Human Resources Business Partner, and/or their Human Resources Business Partner Lead/Director. In addition, all members should feel comfortable bringing matters to the Vice President of their business unit, or if necessary, through the following applicable alternate options:

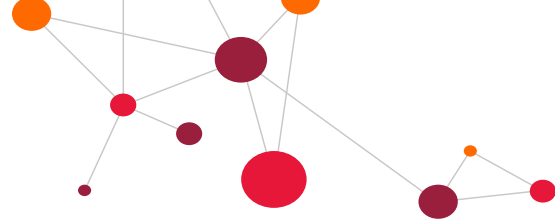
- CGI CSG and Corporate Services members – can send an email to [US\\_Employment\\_Compliance@cgi.com](mailto:US_Employment_Compliance@cgi.com). Your message will be directed to CSG's Employee Relations team to assist you.
- CGI Federal members – can reach the CGI Federal hotline by phone at 1-866-594-7369, or by Internet at [www.cgifederal.ethicspoint.com](http://www.cgifederal.ethicspoint.com) (domestic and international options are available). CGI Federal members can also contact the CGI Federal Ethics Office by phone at 703-227-4555 or by email at [ethics.officer@cgifederal.com](mailto:ethics.officer@cgifederal.com).

CGI will take thorough, prompt, fair, and appropriate action to examine the facts and investigate the allegations. The name of the person reporting the facts and any information obtained by CGI during the course of its investigation will be kept confidential, to the extent practicable. If the investigation discloses that an individual has committed an act of discrimination, or otherwise engaged in behavior not in keeping with CGI's philosophy, culture or policies, that individual will be subject to appropriate disciplinary action, up to and including termination of employment. Any disciplinary action taken will be in proportion to the seriousness of the behavior involved.

## RETALIATION

Integrity at CGI is fundamentally important because it is the foundation of trust on which CGI operates. CGI prohibits any kind of retaliatory act against an individual who has complained about or reported discrimination, or who has participated in an investigation by CGI of a discrimination complaint. Unlawful retaliation can be any action, regardless of where it occurs, that could discourage a member from coming forward to make or support a discrimination or harassment claim. Such retaliation is unlawful under federal, state, and (where applicable) local law and will not be tolerated.

Even if the underlying alleged discrimination or harassment does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had an objectively good faith belief that the actions alleged were unlawful. However, the retaliation provision does not protect persons making intentionally false allegations.



## AFFIRMATIVE ACTION PROGRAM

As a government contractor covered by the terms of Executive Order 11246 Section 503, and VEVRAA, CGI has committed to take affirmative steps to enhance employment opportunities for minorities, women, individuals with disabilities, and protected veterans. Accordingly, CGI has committed that it will not discriminate against applicants or members based on these factors. In addition, CGI will take affirmative steps to ensure that meaningful employment and promotional opportunities are maintained for all persons, including those protected by the Executive Order 11246, Section 503, and VEVRAA.

Our commitment to take these steps is based not only on the requirements of these laws but also on CGI's long-standing commitment to maintain a workforce reflective of the communities in which it operates.

The most effective way CGI can promote its affirmative action commitment is to make a concerted effort to identify and hire qualified minorities, females, individuals with disabilities, and protected veterans. Managers and members should be alerted to the policies and practices of CGI's recruiting sources. Subcontractors and suppliers should notify the Vice President of Human Resources if those policies and practices conflict with CGI's affirmative action goals or objectives of equal employment opportunity. Additionally, CGI will take affirmative steps to identify and establish relationships with organizations that can provide greater percentages of qualified candidates who identify as minorities, females, individuals with disabilities, and covered veterans.

CGI's commitment and support for its affirmative action program begins at the top with our U.S. Presidents, Dave Henderson and Tim Hurlebaus. They have tasked the U.S. Vice Presidents of Human Resources Operations, for the Commercial and State Government business unit and the Federal business unit, respectively, with the responsibility to monitor CGI's Affirmative Action Program through its internal audit and reporting system and report to CGI management the company's progress in attaining the goals established by this plan.

CGI expects that all supervisors, managers, and members will cooperate in collecting required data and preparing the reports needed to monitor CGI's Affirmative Action compliance.

If you are an individual with a disability as defined by the Americans with Disabilities Act, or the Rehabilitation Act, or a protected veteran, and believe that you qualify for consideration under any of CGI's affirmative action programs, you may self-identify now or anytime in the future by contacting your assigned Human Resources Business Partner. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. Be assured that your self-identification will be kept in confidence and will only be used in accordance with government regulations.

CGI members and applicants may review the non-confidential portions of CGI's Affirmative Action Plans by contacting their Human Resources Business Partner, Monday through Friday between 9:00 a.m. and 5:00 p.m.

## REVIEW

CGI will review this policy at least annually and will make necessary adjustments to ensure that it continues to meet its objective of providing all members with a respectful, safe, and healthy work environment.

## INQUIRIES

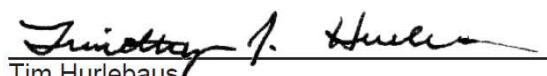
Inquiries about the U.S. Equal Employment Opportunity and Anti-Harassment Policy can be made to your assigned Human Resources Business Partner.



Dave Henderson  
President, CGI Technologies and Solutions Inc.  
U.S. Operations, Commercial and State Government

9/30/2020

Date



Tim Hurlebaus  
President, CGI Federal Inc.  
U.S. Operations, Federal

9/30/2020

Date

**OWNER:** U.S. Employment Compliance with U.S. Legal  
**APPROVING AUTHORITY:** Presidents, U.S. Strategic Business Units

## REVISION HISTORY

Version	Date	Author	Description
1	11/13/2006	Prohovic, Missy	Initial Version
2	10/31/2007	Prohovic, Missy	Annual review of policy; distribute for SBU signature of President
3	01/09/2008	Prohovic, Missy	Annual review of policy; distribute for SBU signature of President
4	03/24/2009	Prohovic, Missy	Annual review of policy; distribute for SBU signature of President
5	06/29/2010	Prohovic, Missy	Annual review of policy; distribute for SBU signature of President
6	11/08/2011	Prohovic, Missy	Annual review of policy; distribute for SBU signature of President
7	11/06/2012	Prohovic, Missy	Annual review of policy; distribute for SBU signature of President
8	10/29/2013	Prohovic, Missy	Annual review of policy; distribute for SBU signature of President
9	10/24/2014	Prohovic, Missy	Annual review of policy; distribute for SBU signature of President
10	10/12/2015	Prohovic, Missy	Annual review of policy; distribute for SBU signature of President
11	9/26/2016	Prohovic, Missy	Annual review of policy; distribute for SBU signature of President
12	10/05/2017	Prohovic, Missy	Annual review of policy; distribute for signatures from both SBU Presidents
13	09/27/2018	Prohovic, Missy	Annual review of policy; distribute for signatures from both SBU Presidents
14	09/13/2019	Prohovic, Missy	Annual review of policy; distribute for signatures from both SBU Presidents
15	09/23/2020	Prohovic, Missy	Annual review of policy; distribute for signatures from both SBU Presidents