



DATA ETHICS POLICY

CGI Denmark

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1 Introduction

This policy describes our approach to Data Ethics for CGI Denmark pursuant to section 99 d of the Danish Financial Statements Act.

CGI's values constitute the foundation of our corporate governance practices. We are proud to operate as a responsible business to balance the interests of our key stakeholders, our clients, our shareholders, and our members. This policy formalises general principles that will be taken into consideration when we use or process data within CGI Denmark.

2 Our Data Ethics Principles

As part of a global IT and business consulting services organization, CGI is committed to maintaining levels of protection of data aligned to best practices in the industry which, as a minimum, comply with the requirements of the applicable legislation and CGI's contractual obligations. However, being a company with a strong ethical commitment also regarding ethical use of data takes more than being legally compliant.

In this way CGI recognizes the importance of ethical considerations when it comes to the use (including generation, recording, curation, dissemination, sharing, processing, or any other kind of use) of any type of data (personal as non-personal) and therefore endeavor to bring awareness of the topic in the organization by focusing on the following principles.

2.1 Transparency

CGI aims to be transparent about the data we use by documenting how and why we collect and process not only personal data (as already stated in the CGI Data Privacy Policy) but also non-personal data where a risk of ethical considerations is relevant.

Clear and transparent data management policies regarding systems that uses data is a key element of ethical behavior. When developing AI for clients or other solutions using big data, we will encourage our clients in the same direction.

2.2 Use of data

CGI does not and will not capitalize on data.

When developing for example AI solutions at our client's request, we take ethical aspects into considerations and are aware of the need for AI solutions to be - at a minimum – respectful to human autonomy, fair, explainable, and reliable.

2.3 Accountability

We will account for this policy once a year in accordance with section 99 d of the Danish Finance Statement Act, and will bring even more focus on implementing "ethical use of data"- awareness as a part of our general Code of Ethics training for Members to be able to ask questions internally in CGI if unethical use of data is discovered and to advise clients in an ethical use direction; CGI Code of Ethics applies to all members and the CGI Third Party Code of Ethics applies to all third-party vendors. The Code of Ethics is re-committed by every member once a year. Data privacy and security awareness training is also performed once a year by all Members.

3 Annual Report

With the publication of CGI Denmark's annual report for the financial year 2022, CGI Denmark will hereon annually evaluate and report on the Data Ethics Policy in the annual report.

4 Approval

This policy has been approved by the Board of directors for CGI Denmark A/S on February 3rd, 2023.