



Transparency Act 2023

June 30, 2023

CGI Norge AS

CGI

About us

Founded in 1976, CGI Inc. ('CGI') is among the largest independent IT and business consulting services organizations in the world. With 90,250 consultants and other professionals across the globe, CGI delivers an end-to-end portfolio of capabilities, from strategic IT and business consulting to systems integration, managed IT and business process services and intellectual property solutions. CGI works with clients through a local relationship model complemented by a global delivery network that helps clients digitally transform their organizations and accelerate results.

The Transparency Act (the "Act") applies to CGI's Norwegian subsidiary, CGI Norge, due to it being a large enterprise established in Norway.

CGI Norge is a major employer working in nine offices across Norway with around 600 employees. CGI Norge provides services within a broad IT spectrum. In Norway, we are focusing on the following industries: Government, Energy, Manufacturing, Retail and Utilities. We mainly provide our services to customers in the Norwegian market, but we also provide services to Norwegian customer's affiliates, and, to a smaller extent, foreign customers.

CGI has implemented a governance and quality system, our Management Foundation, which sets out enterprise policies and processes which apply to all entities of CGI, including CGI Norge AS ('CGI Norge') as a part of the CGI group of companies.

About our Transparency Act Statement

This statement constitutes CGI Norge's account under the Act for the financial year 2022.

This statement reflects our established commitment to providing safe and fair working conditions for all our employees. It also reflects the way in which we work with our suppliers to ensure socially responsible and ethical business practices are embedded throughout our organization and beyond. It requires the support of our leaders, members, clients, shareholders and suppliers.

As a people-oriented organization with 90,000 members, a global company operating in a variety of countries with diverse cultures and local regulations, and a buyer with more than 10,000 suppliers in our supply chain, we recognize human rights to be fundamental. Our approach with respect to human rights and working conditions is consistent globally across CGI.

As a services organization where the majority of our employees are highly skilled and are contracted directly by our company, we consider the risk of breaching human rights and working conditions within our own work force to be low. However, we know this exists in many different sectors across the world, and we recognize a robust approach is required in our own operations and throughout our supply chain.

We continue to improve our processes to mitigate the risk that we are directly or indirectly involved in any human rights and working conditions abuse. As we consider our biggest exposure to this to be in our supply chains, our focus has been on our procurement processes, which we have enhanced through:

- Strengthening supplier risk assessments to enhance our understanding of suppliers' exposure to and management of sustainability risks, including actual and potential adverse impacts on fundamental human rights and decent working conditions
 - Developing an incident response plan if there are potential adverse impacts in our operations or supply chain
 - Deploying mandatory training for our procurement team
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- CGI is fully committed to respecting fundamental human rights throughout our operations and supply chain. Our understanding of these rights is drawn from the Universal Declaration of Human Rights, and we strengthened our commitment in 2020 by signing the UN Global Compact. We uphold the 10 Principles of the Global Compact, including respect for human rights and to support the elimination of all forms of forced and compulsory labour. We follow the guidance of the Sustainable Development Goals, focusing on the most relevant ones for a greater impact.

Goals we directly affect



Our policies and procedures

CGI has invested in developing a strong corporate culture that reflects our approach to business. These values include respect, objectivity and integrity, and corporate social responsibility (CSR).

CGI's founding, ongoing development and commitment to be a responsible business is inspired and governed by the CGI dream: "To create an environment in which we enjoy working together and, as owners, contribute to building a company we can be proud of." Intrinsic to this idea is our goal to serve as a caring and responsible corporate citizen. Our ESG Policy outlines our sustainable procurement policy objectives and commitment to human rights standards.

Our code of ethics

At CGI our employees are known as 'members' to reflect that they are not only employees or workers but participants in the business and contribute to its success. All members are required to acknowledge on an annual basis that they have read and understood CGI's Code of Ethics in the form of the "Member Commitment". Through the signing of this commitment, members agree to treat all persons with respect and integrity

and to respect human rights in every aspect of our business. Additionally, section 1.7 of our Code states that:

"CGI recognizes that slavery is both illegal and unacceptable. As a services organization in which most of our members are highly skilled and directly employed by CGI, we consider the risk of modern slavery within our own organization to be low. However, CGI has implemented an additional procurement process to mitigate the risk of slavery in our supply chain. We expect all third-parties with whom we work to comply with anti-human trafficking and anti-slavery legislation. To that end, the CGI Third-Party Code of Ethics aims to provide suppliers with the appropriate guidance to make informed business decisions while working with CGI."

Our Code of Ethics and Third Party Code of Ethics (which we describe further below) outline our commitment to protecting fundamental human rights and decent working conditions in our business operations and supply chains. It outlines that the prevention, detection and reporting of any actual and potential adverse impacts on fundamental human rights and decent working conditions in any part of our business or supply chains is the responsibility of all those working for CGI. It sets out our commitment to work with suppliers to help them eliminate any adverse impacts on fundamental human rights and decent working conditions and support those impacted. CGI may terminate the relationship with suppliers, other individuals and organizations working on CGI's behalf if they breach our Third Party Code of Ethics.

CGI's members are expected to comply with the Code and all policies and procedures of the company, as well as to actively promote and support CGI's values.



Recruitment

Our commitment to high standards of human rights is reflected throughout our recruitment practices and on-boarding process. As part of ensuring this, CGI employment contracts and policies include the following provisions:

- Freedom of members to terminate their employment with us at any time
- Freedom of movement
- Protection from any threat of violence, harassment and intimidation in the workplace
- Obligation to work is not used as a disciplinary measure
- For CGI Norge, overtime is handled according to the Norwegian Working Environment Act

We ensure prospective employees are legally able to work in the Norway and conduct appropriate right to work checks. These checks, and additional security vetting and referencing remain as rigorous as ever.

We recognize the risks associated with recruitment agencies. We only use reputable employment agencies to source new employees and always verify the practices of any new agency we use before accepting staff from that agency.

We are committed to paying all our people fairly and recognizing their valuable contribution to the success of our business.

Our suppliers

Recognizing our highest exposure to actual and potential adverse impacts on fundamental human rights and decent working conditions is through our supply chain, CGI has taken a robust and thorough approach to ethical and sustainable procurement.

The CGI Procurement Policy governs the behaviour of all CGI members who require goods or services from suppliers. One of its key purposes is to support compliance with CGI's legal, regulatory, ethical, labour and human rights obligations as a responsible business.

The Policy defines the responsibilities of members in relation to procurement activities and outlines that members must adhere to all CGI policies and processes that relate to suppliers and must conduct procurement activities in accordance with CGI's standards of business ethics - as outlined in the Code of Ethics. Any violation of this policy may result in administrative and/or disciplinary action by CGI, including termination.

Responsible supply chain management is a key part of our supplier process. CGI requires its suppliers to meet high standards regarding fundamental human rights and decent working conditions and expects them to adopt similar approaches in their own supply chains. This ensures that the organizations we work with and that support our organization are aligned with CGI's vision and goals.

We will only procure from suppliers that follow CGI's Third Party Code of Ethics. This outlines the standards we expect from our suppliers to ensure that we can collectively make a positive impact on society whilst mitigating any adverse impacts. It contains requirements with regard to minimum wage, safe working conditions and internationally recognised labour standards and specifies that suppliers must under no circumstances use, or in any other way benefit from forced or involuntary labour. Suppliers are

obliged to report any conduct, including conduct of any CGI member, that it believes in good faith to be an actual, apparent, or potential violation of this Code.

Suppliers' acknowledgement of these standards is documented through their completed Supplier Business Profile. Purchase Orders are not processed unless suppliers have completed and signed CGI's Third Party Code of Ethics or this is waived by CGI, e.g. due to the Supplier's own policies being assessed as upholding substantially the same standards as CGI's Third Party Code of Ethics. As part of our contract renewal process, existing suppliers are also contacted at regular intervals to obtain or renew their acknowledgement of CGI's Third Party Code of Ethics.

We recognise the important role of responsible purchasing practices in mitigating actual and potential adverse impacts on fundamental human rights and decent working conditions. We are committed to developing long-term relationships with suppliers and in recent years have focused on consolidating our spend on IT hardware and software. Diverting spend to preferred suppliers and reducing our transactional short-term relationships enable us to establish longer-term relationships with suppliers in this high-risk category of spend. This allows CGI to deepen our understanding of how the preferred suppliers manage human rights risk in their business and supply chain, and to encourage and support those suppliers to adopt sustainable procurement practices, which mitigates risks for both CGI and the suppliers.

Partnering with EcoVadis

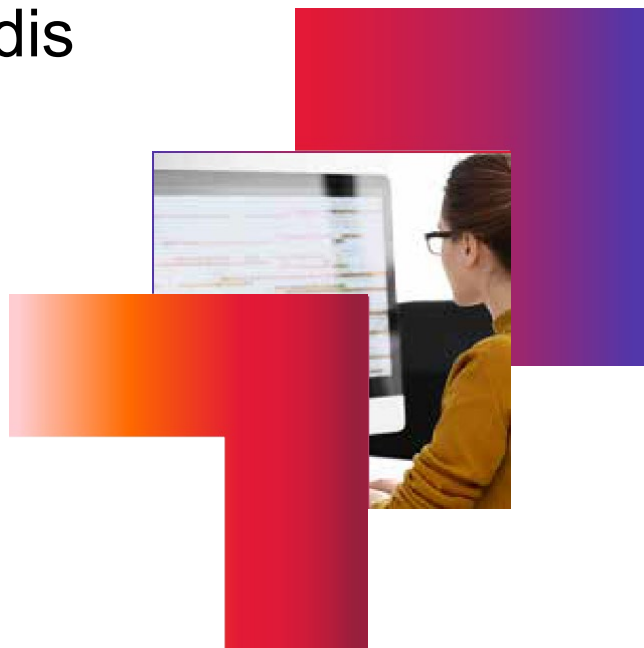
We have been working with EcoVadis, a specialist sustainability ratings agency, since 2017 to conduct due diligence on our high risk suppliers.

Used by over 60,000 businesses worldwide, EcoVadis' ratings and detailed scorecards enable CGI and our suppliers to understand their sustainability performance and to work together if improvements are needed.

Their rating is generated through an evidence-based assessment, which takes into account relevant industry labels and certifications and is aligned with global standards including the UN Global Compact and the International Labour Organisation (ILO) conventions.

The assessments focus on 21 criteria across four sustainability themes: the environment, labour and human rights, ethics and sustainable procurement.

Criteria within labour includes employee health and safety, working conditions and social dialogue. The criteria within the human rights section includes child and forced labour, and human trafficking. The assessment comprises questions on policies such as modern slavery, recruitment, and migrant workers, and actions such as supply chain mapping, supplier risk verification, training and grievance mechanisms. By assessing our suppliers' performance on sustainable procurement, we also get insight into the management of our tier 2 suppliers.



Grievance mechanisms and remedy for victims

Members and suppliers are required to raise concerns about any issue or suspicion of violations of our Code of Ethics or Third Party Code of Ethics in CGI's business or operations or in any of CGI's supply chains (at any level or tier) as soon as they arise. This can be reported anonymously via our ethics (whistle-blower) hotline which is available to all employees, suppliers, clients and members of the public on our website.

CGI encourages openness and will support anyone who raises genuine concerns, even if they turn out to be mistaken. CGI is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that an actual or potential actual and potential adverse impacts on fundamental human rights and decent working conditions is, or may be, occurring or about to occur, has taken place, or may take place in the future.



Assessing the effectiveness of our approach to implement the Transparency Act

During our financial year 2022, our approach to implement the Act has been to review the Act and the guidelines given by Forbrukertilsynet to assess to what extent our well-established processes and commitment to the UN Global Compact fulfil the requirements under the Act. Accordingly, we have looked for potential gaps and actions to be undertaken in order to ensure full compliance with the Act.

Simultaneously, we have initiated due diligence assessments of our suppliers for actual and potential adverse impacts on fundamental human rights and decent working conditions, applying a risk-based approach in line with our Risk Management process. Our focus for fiscal year 2022 has been to identify and map all suppliers to CGI Norge, including which are based inside and outside of the EEA. Our most recent assessment shows that CGI Norge has around 210 suppliers, of which 205 are established in the EEA, where existing laws and regulations regarding human rights and decent working conditions are already in force.

Action: Next fiscal year, CGI Norge will follow up and document our supply chain outside of the EEA and assess any actual or potential negative impacts to human rights and descent working conditions. CGI contract-owners must contact the suppliers and assess compliance with relevant CGI policies.

CGI Norge also buys hardware from Norwegian suppliers. As this hardware is normally produced outside of Norway, we have identified an additional action related to hardware procurement.

Action: Next fiscal year, CGI Norge will request information from our hardware suppliers that they themselves and their supply chain adhere to the Act and ask about (handling of) any identified actual or potential negative impacts to human rights and descent working conditions.

CGI has established its own risk management process. Under the Act, due diligence assessments must be aligned with the OECD Guidelines for Multinational Enterprises. The OECD guidelines set out that businesses must:

1. Embed responsible business conduct into polities and management systems.
2. Identify and assess adverse impacts in operations, supply chains and business relationships.
3. Cease, prevent or mitigate adverse impacts.
4. Track implementation and results.
5. Communicate how impacts are addressed.
6. Provide for or cooperate in remediation when appropriate.

We have assessed that CGI's Risk Management is overall compatible with the above-mentioned requirements. However, we still need to assess the details of the guidelines in order to ensure full alignment between them and CGI's Risk Management process.

Action: Next fiscal year, CGI's Procurement team will continue investigating if current CGI processes have gaps towards the OECD guidelines.

While conducting an assessment our supply chain, we have found that, in relation to ensuring compliance, our current policies primarily focus on the onboarding of new suppliers, while responsibility for following up compliance of existing suppliers is not clearly anchored. We have identified further that our current procedures do not, to a satisfyingly degree, include follow-up and reporting of tracked implementation of and results of due diligence processes.

Action: Next fiscal year, CGI's Procurement team will ensure periodic reporting of negative impacts or consequences as well as measures to be implemented. The requirements for periodic reporting will, starting in June 2023, be managed in a biweekly meeting. The meeting will secure that new suppliers are ESG assessed, review any deviations in the result, establish ownership and discuss mitigations with stakeholders and affected parties.

Governance

CGI Norge's board of directors ('the board') has overall responsibility for ensuring that the CGI Norge's business respects fundamental human rights and decent working conditions in accordance with the Act and supports the ongoing efforts to ensure compliance with the Act.

CGI Norge has initiated a project to ensure compliance with the Act and the main responsibility for the project rests with the Operations Lead of CGI Norge. As part of this project, a working group has been formed which includes members in the Procurement and ESG team, with support from the Corporate Legal Services.

This statement is signed and approved by CGI Norge's Board of Directors and Managing Director and may be found on CGI Norge's website.

30 June 2023

Steve Perron
Director and Chair

Karianne Hoe
Director and Managing Director

Volker Matthias Katz
Director

Bergitte Tønnesen Andersen
Director

Jostein Olav Håøy
Director

Karl Gustav Solberg
Director



About CGI

Insights you can act on

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