

# Transparency Act Statement 2024

## CGI Norge AS

2025-06-27

# About us

**The Transparency Act (the “Act”) applies to CGI’s Norwegian subsidiary, CGI Norge AS (hereafter CGI Norge), due to it being a large enterprise established in Norway.**

**This report is for the 2024 fiscal year (1 October 2023-30 September 2024) and is published pursuant to Åpenhetsloven, The Transparency Act, (the Act).**

**The report is aligned with the guidelines by the Norwegian Consumer Authority (Forbrukertilsynet)**

## Insights you can act on

Founded in 1976, CGI is among the largest independent IT and business consulting services firms in the world. With 94,000 consultants and 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.

[Contact us](#)

# Table of Contents

**Transparency Act Statement**4

1

Our organizational structure

4

1.1

Policies in relation to human rights and working conditions

5

1.1.1

Our company culture

5

1.1.2

Recruitment

5

1.1.3

Code of Ethics

6

1.1.4

Working with third parties

6

2

Due diligence assessments

7

2.1

Activities and supply chains that carry a risk of breach of human rights and working conditions

7

2.2

Assessing and managing supplier risks

7

2.2.1

EcoVadis supplier due diligence

8

2.3

Assessing effectiveness

9

2.4

Training

9

3

Keyfindings and actions

10

3.1

No negative findings

10

3.2

Follow-up on actions from last year's statement

10

4

Reporting channels and complaints mechanisms

11

4.1

Remediation policies and processes

11

**Governance**12

# Transparency Act Statement

This statement constitutes CGI Norge’s account under the Act for the financial year 2024.

This statement reflects our established commitment to provide safe and fair working conditions for all our employees (hereafter Partners). 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, Partners, clients, shareholders and suppliers.

## 1 Our organizational structure

Founded in 1976 and headquartered in Montreal, CGI Inc. (CGI) is among the largest independent IT and business consulting services firms in the world. With 94,000 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 proximity model complemented by a global delivery network that enables clients to digitally transform their organizations and accelerate results.

CGI Norge is a subsidiary of CGI Inc. We are a major employer working in seven offices across Norway with around 410 employees. CGI Norge provides services within a broad IT spectrum and focus on the following industries: Government, Energy, Manufacturing, Retail, Defence 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. We deliver the following IP services: WinTid (standarized time and workforce management solution), IS Suite (settlement, invoicing and collection for the Utility sector) and PayPartner360 (banking services).

As a global company operating in multiple countries with diverse cultures and local regulations, and as a buyer with more than 10,000 suppliers in our supply chain, we recognize human rights to be fundamental. Therefore, at CGI, we are fully committed to respecting human rights throughout our operations and supply chain in accordance with United Nations (UN) guidelines. We align our policies and standards with the Universal Declaration of Human Rights, strengthening the commitment made in 2020 as a signatory of the UN Global Compact (UNGC). Our commitment is reflected in our global Environment, Social and Governance (ESG) strategy which has a core focus on human rights and includes our approach to modern slavery. We maintain a global commitment to human rights supplemented by locally focused monitoring of suppliers by our procurement business partners where required. This governance structure enables practices in line with our human rights commitment and confirms compliance with all applicable local regulatory requirements in which we operate.

At CGI our employees are known as ‘Partners’ to reflect that they are not only employees or workers but participants in the business and contribute to its success.

Goals we directly affect



## 1.1 Policies in relation to human rights and working conditions

As a services organization where most of our CGI Partners are highly skilled and are recruited and contracted directly by our company, we consider the risk of forced labour and child labour within our own work force to be low. However, we know that forced labour exists in many different sectors across the world and we recognize that a robust approach is required both in our own operations and throughout our supply chain.

With regards to working conditions our Partners work in offices with little risk of incidents. No incidents have been reported for Norwegian Partners during the last Fiscal Year.

### 1.1.1 Our company culture

CGI has invested in developing a strong corporate culture with the values of respect, objectivity and integrity, and corporate social responsibility. CGI's founding and ongoing commitment to be a responsible business is inspired 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 be recognized by our stakeholders as an engaged, ethical and responsible corporate citizen.

These commitments are embodied throughout CGI policies which govern the way we conduct business. Our Respectful Workplace Policy outlines CGI's commitment to maintaining professional workplaces that respect the dignity of all CGI Partners, in line with our company values and our Code of Ethics and Business Conduct (the "Code of Ethics"). Our Environmental, Social and Governance ("ESG") Policy outlines our sustainable procurement policy objectives and commitment to human rights standards.

Our ESG practices, goals and progress are assessed annually by EcoVadis, the world's largest business sustainability ratings agency. We are proud to have achieved the 'Gold' rating in 2024. It is awarded to organizations with ongoing implementation and integration of measurable and traceable initiatives in the categories of environment, labour and human rights, ethics and sustainable procurement practices. It places us in the top 5 % of companies in the computer services, consultancy and related activities industry for our performance on sustainability.

### 1.1.2 Recruitment

Our commitment to high standards of human rights is reflected throughout our recruitment practices and onboarding 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 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.

CGI's ISO 9001-certified Partner Partnership Management Framework (MPMF) governs how we manage our CGI Partners relationships. We are proud of the strong and long-term relationships we build with our consultants and professionals through a prescribed set of activities, including new joiner orientation and integration, performance and career management, satisfaction measurement, as well as one-on-one and team meetings. This approach encourages a collective ownership to managing CGI Partner relationships and ensures two-way engagement against a formalised structure and process with regular communication. It increases CGI Partner satisfaction, enhances the working environment and provides an opportunity to identify anyone who may have been subjected to forced labour. In addition, we encourage all CGI Partners to identify and report any potential human rights issues.

### 1.1.3 Code of Ethics

Upon on-boarding and on an annual basis thereafter, all CGI Partners are required to acknowledge that they have read and understood CGI's Code of Ethics in the form of a "Commitment". Through this commitment, CGI Partners agree to treat all persons with respect and integrity and to respect human rights in every aspect of our business. CGI Partners are expected to comply with the Code of Ethics and all policies and procedures of the company, as well as to actively promote and support CGI's values.

Our Code of Ethics can be accessed here <https://www.cgi.com/en/corporate-governance/code-of-ethics#> .

As a services organization in which most of our consultants and professionals 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 step in our 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 Third-Party Code of Ethics can be accessed here: <https://www.cgi.com/en/corporate-governance/third-party-code-of-ethics>

### 1.1.4 Working with third parties

Recognizing that our highest exposure to modern slavery 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 Partners who procure goods or services from suppliers. One of its key purposes is to support compliance with CGI's legal, regulatory, ethical, labour, human rights, and contractual obligations as a responsible business. The Policy outlines that CGI Partners 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 our suppliers to meet high standards regarding labour and human rights and expects them to adopt similar approaches in their supply chains.

This helps ensure that the organizations we work with and that support our business activities are aligned with CGI's vision and goals. We will only procure from suppliers that commit to CGI's Third-Party Code of Ethics. The Third-Party Code of Ethics is publicly available on CGI's website and outlines the standards we expect from our suppliers to demonstrate that we can collectively make a positive impact on society while mitigating any adverse impacts. It contains requirements concerning minimum wage, safe working conditions and internationally recognized labour standards and specifies that suppliers must under no circumstances use, or in any other way benefit from forced or involuntary labour.

We include compliance with the Third-Party Code of Ethics as a requirement on every CGI purchase order. We consider as the only exception third parties who have demonstrated implementation of, or are otherwise subject to, comparable rules of ethical conduct. As part of this compliance, suppliers are obliged to report any conduct, including the conduct of any CGI Partner, that it believes in good faith to be an actual, apparent, or potential violation of the Third-Party Code of Ethics.

## 2 Due diligence assessments

### 2.1 Activities and supply chains that carry a risk of breach of human rights and working conditions

Like many organizations in the services and technology sector, we recognize that by taking a proactive and vigilant approach, we can help mitigate the risk of forced or child labour in our supply chains and contribute to sustainable and ethical business practices.

The highest risk suppliers for large IT and business consulting services firms such as CGI are:

- Suppliers involved in the manufacturing of technology hardware which may involve complex supply chains with multiple tiers. Labour exploitation risks can be present in the mining of raw materials, manufacturing, and assembly processes.
- Suppliers based in locations assessed by the Global Slavery Index organization as high risk.
- Suppliers who support us with the maintenance of our buildings and facilities such as construction, catering, security, and property maintenance. Often these roles require minimal training, education, or specialized skills and therefore can be more subject to exploitation.

### 2.2 Assessing and managing supplier risks

We are working to mitigate modern slavery risks at all stages of the procurement process. Our onboarding process for suppliers is designed to ensure that suppliers can deliver high-quality service to our clients and meet high standards regarding human rights.

We have recently strengthened how we assess suppliers' exposure to, and management of, sustainability risks. This is now managed in our automated supplier creation and due diligence processes in our Third-Party Supplier

Portal. All new suppliers complete a questionnaire that determines whether further due diligence is required. Questions on labour and human rights include whether suppliers operate or manufacture products in high-risk geographies or use labour that is subject to greater risk of modern slavery due to the nature of the workforce (such as reliance upon low-skilled labour or agency workers) as well as suppliers' policies and commitments on labour and human rights. The assessment questions were developed with input from human rights experts using data from resources such as the Global Slavery Index.

Following this initial assessment process, should a supplier be identified as higher risk, a more detailed assessment is requested through EcoVadis or another reputable assessment partner.

## 2.2.1 EcoVadis supplier due diligence

We have worked with EcoVadis, a specialist sustainability rating agency, since 2017 to conduct due diligence on our high-risk and significant suppliers. Used by over 60,000 organizations worldwide, EcoVadis' ratings and detailed scorecards enable CGI and our suppliers to understand their sustainability performance and to work together when improvements are needed. Their rating is generated through an evidence-based assessment, which considers relevant industry labels and certifications and is aligned with global standards including the UN Global Compact and the International Labour Organization conventions.

The assessments focus on 21 criteria across four sustainability themes: the environment, labour and human rights, ethics, and sustainable procurement. Criteria within labour include CGI Partners 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, including detailed evidence of their approach, we also get insight into the management of companies that subcontract to our direct suppliers (for instance, the number of confirmed cases of modern slavery or key performance indicators such as the number of suppliers evaluated/audited and training results). This information is verified against external evidence, such as labour assessment reports, news articles, judicial sources, trade union data and additional information from other published sources. These assessments enable the business to make an informed decision about whether to work with the supplier and to add them to our approved supplier list. Suppliers also have access to their sustainability scorecard which outlines their strengths and weaknesses as well as tools to improve their performance. CGI Partners who are managing suppliers can also use these reports, to work with suppliers to encourage continuous improvement as part of the annual supplier business review process. All suppliers are required to complete these assessments annually so we can continue to monitor and check their compliance with our human rights standards. If a supplier receives a low EcoVadis score (below 44) or declines to undertake the EcoVadis assessment, the Global ESG Team and assigned Procurement Business Partner receive an automatic alert. Upon notification, they are to take appropriate action. If suppliers refuse to complete the assessments or fail to sufficiently improve their practices and meet our requirements, as a last resort, CGI will explore options for termination of any existing contractual relationship and proceed to source out alternative suppliers.

Responsible purchasing practices have a key role in mitigating negative 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

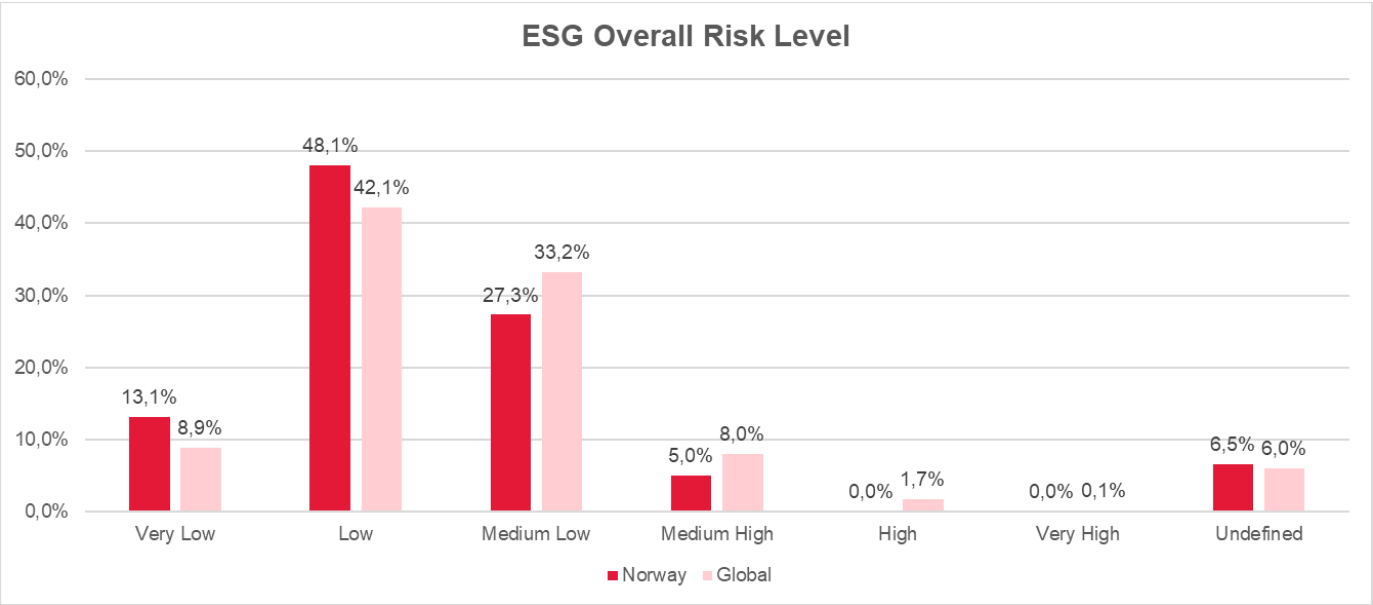


suppliers and reducing our transactional short-term relationships enables us to establish longer-term relationships with suppliers. This allows CGI to deepen our understanding of how the preferred suppliers manage human rights risks in their business and supply chain, and to encourage and support those suppliers to adopt sustainable procurement practices, which mitigates risks for both CGI and the suppliers.

### 2.3 Assessing effectiveness

We use several key performance indicators to assess the effectiveness of our actions, such as the number of suppliers evaluated and the percentage of completed training in our procurement team. We prioritize the continuous monitoring and improvement of our practices, acknowledging that the fight against modern slavery requires a dynamic and evolving response. We continue to strengthen our supplier risk mitigation process by focusing priority actions on our 250 significant suppliers with which we have done the most business over the last three years. By 2025, our target is to have 70% of these significant suppliers assessed by EcoVadis on their social and environmental performance, business ethics, and sustainable procurement performance. We are progressing well against the target, with 68.5 % of our significant suppliers currently evaluated by EcoVadis.

In FY24, we enhanced our ESG assessment process for new and existing suppliers by using the EcoVadis IQ Plus solution, an external sustainability Risk Intelligence tool for Global Supply Chains. The system pre-screens suppliers using data mining to understand individual supplier risks based on Geography and Industry.



Source: IQ Plus, as of June 4, 2025

Using the data from the searches, suppliers that have been identified as high-risk will be requested to complete EcoVadis assessments to provide additional information. In parallel, we continue to send the ESG questions as part of the standard regular process and are looking to implement a specific process for our smaller and medium-sized suppliers.

### 2.4 Training

As we consider our biggest exposure to human rights and working conditions to be in our supply chains, we provide targeted annual mandatory training for all Partners of CGI's global procurement team.

Each training session has included a presentation from subject matter experts and covered the International Labour Organization indicators of forced labour, how to consider modern slavery risks in procurement and relevant CGI policies and practices, including how to respond to suspected cases of breach on human rights and working conditions.

## 3 Keyfindings and actions

### 3.1 No negative findings

We have conducted surveys with ten suppliers which we according to our risk analysis can be high risk (mainly companies who delivers hardware). Most of these companies filed reports according to the Act's requirement giving information that both they comply with the Act and also remediate findings. One company has not finally responded to us which we follow up under the actions mentioned below.

No negative consequences/findings have been found for CGI Norge during the Fiscal Year 2024.

The guidelines given by the Norwegian regulatory authority Forbrukertilsynet requests us to assess if we are being impacted by what is going on in Ukraine and the Gaza strip. Our current investigations don't indicate that, since we don't source any supplies from these areas. This needs to continuously followed-up due the unrest in the world today. This is part of our quarterly Enterprise Risk Assessment.

### 3.2 Follow-up on actions from last year's statement

**Action 1:** 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.

*Result 1:* We are continuing to use EcoVadis as part of our procurement process to qualify suppliers as well as they have to sign our Third Party Code of Ethics. We will continue to make random samples with suppliers with a higher risk based on the EcoVadis IQ Plus solution with medium-high risk. But so far none of such samples have indicated that human rights and labour conditions have been violated. The one supplier who have not fully responded, will be followed up.

*Action 2:* CGI Norge continued to request information from our hardware suppliers and suppliers based on our risk analysis for their adherence to the Act and ask about (handling of) any identified actual or potential negative impacts to human rights and descent working conditions.

*Result 2:* We have requested this information from the suppliers identified with a higher risk. No violation has been reported of human rights and labour conditions, but we will continue this work. Please review the follow up action in *Result 1* regarding which samples to investigate.

## 4 Reporting channels and complaints mechanisms

### 4.1 Remediation policies and processes

CGI Partners and suppliers are required to raise concerns about any issue or suspicion of breach on human rights and working conditions in CGI's business or operations or any of CGI's supply chains (at any level or tier) as soon as possible. This can be reported anonymously via our ethics (whistle-blower) hotline which is available to all CGI Partners, 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 act of modern slavery is, or may be, occurring or about to occur, has taken place, or may take place in the future.

CGI Norge has also an internal portal for reporting internal issues and deviations related to Health, Security and Environment (HSE) which will be handled according to our internal process and with confidentiality.


# 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.

The Operations Lead of CGI Norge leads the daily work ensuring compliance with the Act supported by CGI's Board of Directors, Global Procurement, ESG, Ethics and Compliance and 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.

27 June 2025

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