



Rules of Procedure for Complaints under the Supply Chain Due Diligence Act

CGI Deutschland B.V. & Co. KG

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CGI

Table of contents

1	Basics	3
1.1	Material scope of application	3
1.2	Reporting	3
2	Responsibilities	4
3	Procedural principles	4
3.1	Objectivity and independence	4
3.2	Presumption of innocence	4
3.3	Protection from discrimination and punishment	4
3.4	Appropriateness	4
3.5	Confidentiality	4
4	Procedure	5
4.1	Receipt of a Report	5
4.2	Carrying out the investigation	5
4.3	Remedial measures and investigation report	5
4.4	Review of the remedial measures	6
5	Effectiveness control	6
6	Documentation and publication	6

1 Basics

CGI acts in accordance with the law as part of a value-based Code of Conduct and expects employees, suppliers and business partners to do the same. Non-compliance with the law is always addressed and remedied appropriately. Constant vigilance is required to recognize violations of laws and regulations in good time so that they can be remedied promptly and immediately. CGI therefore enables employees, suppliers and business partners to point out risks and potential or actual violations in order to give CGI the opportunity to quickly clarify, remedy and, where necessary, penalize them. In this way, CGI fulfills its legal obligations, in particular those arising from the [German Supply Chain Due Diligence Act](#) ("LkSG").

1.1 Material scope of application

The Complaint Procedure enables employees, suppliers and business partners (hereinafter "Whistleblowers") to report human rights and environmental risks and violations to CGI. Violations within the meaning of these Rules of Procedure include all violations of applicable laws and CGI internal regulations, in particular actual or potential violations of human rights or environmental obligations in the context of the business activities of CGI and its direct and indirect suppliers (hereinafter "**LkSG-relevant violations**").

1.2 Reporting

Information on LkSG-related risks and potential or actual LkSG-related violations can be reported free of charge via the reporting channels listed below. If you wish to use postal mail, please address your report to the complaint recipient. In this case, postage costs may apply.

Ethics hotline (managed by the independent service provider Convercent)	https://app.convercent.com/de-Anonymous/IssueIntake/LandingPage/c430ea19-76ad-e911-a96a-000d3ab9f062?_id=1571951870663
E-mail	ethics@cgi.com
Post	If the postal service is desired, the Recipient of Complaints must be selected as the addressee.

Information is always treated confidentially and can also be submitted anonymously - where possible - via the above-mentioned reporting channels.

The following is currently designated as the recipient of the complaint (hereinafter "Recipient of Complaints"):

Inge Fischer
CGI Deutschland B.V. & Co. KG
Frankfurter Strasse 102-110 | 65760 Eschborn | Germany

The Human Rights Officer (hereinafter "Human Rights Officer") is currently appointed:

Frank Michels
CGI Deutschland B.V. & Co. KG
Heesenstrasse 31 | 40549 Düsseldorf | Germany

2 Responsibilities

Within CGI, the Recipient of Complaints is responsible for receiving, reviewing, investigating and documenting an incoming report and discussing this report with the Whistleblower where feasible.

The contact person for the investigation procedure and responsible for reviewing the effectiveness of the procedure is the Human Rights Officer.

3 Procedural principles

3.1 Objectivity and independence

Investigations are carried out independently, impartially and without regard to the person concerned.

3.2 Presumption of innocence

Accused persons are presumed innocent until proven otherwise.

3.3 Protection from discrimination and punishment

CGI will not tolerate any discrimination or punishment of Whistleblowers on the grounds of their whistleblowing and will itself consider it a violation. Such discrimination includes any form of deterioration of the Whistleblower's employment situation, e.g. through dismissal, warning, unjustified assertion of claims for damages, unjustified and disadvantageous transfer or changes in working conditions or unjustified non-renewal of fixed-term employment contracts. CGI will work consistently to ensure that Whistleblowers who are not employed by CGI are also protected against discrimination. This protection does not apply if it can be proven that a report was made against better knowledge.

3.4 Appropriateness

All investigative measures must be geared exclusively to the purpose of establishing and clarifying the facts of the case and must be suitable, necessary and appropriate for this purpose.

3.5 Confidentiality

The disclosure of information via the report and its processing is restricted to the necessary group of persons (*need-to-know* principle). The processors are obliged to maintain the confidentiality of all information of which they become aware. This applies in particular to personal data. Other persons may only be informed on the basis of a legally valid basis. This may be, for example, the consent of the Whistleblower, the person affected by the report, a legal provision or an official order.

4 Procedure

The Investigation Procedure is basically divided into the following five steps:



4.1 Receipt of a Report

Reports received via the Ethics Hotline or by e-mail are subject to an initial review by members of the CGI Legal Department to determine whether they are relevant to the LkSG. This involves checking whether the report received is an LkSG-relevant violation and whether the report is plausible, i.e. whether it describes more than just a theoretical possibility of a risk or violation and contains approaches for further clarification. The information received is then forwarded to the Recipient of Complaints with the result of the initial review.

The Recipient of Complaints accordingly accepts all information received via the Complaint Procedure provided and documents its receipt. If it is possible to contact the Whistleblower, receipt of the Report will be promptly acknowledged to the Whistleblower.

The Recipient of Complaints now checks again whether an LkSG-relevant violation has occurred. If the information is not plausible or does not qualify as an indication of an LkSG-relevant risk or an LkSG-relevant violation (e.g. in the case of customer complaints about the quality of a service received), the Whistleblower is informed of this. After checking the plausibility of the report, the Recipient of Complaints categorizes it and, depending on the category, either forwards it to another department responsible for further processing or continues with the processing itself.

4.2 Carrying out the investigation

The facts described in the Report will be processed, discussed and examined as part of an internal investigation. Where possible and appropriate, the facts will be discussed with the Whistleblower or the Whistleblower will be informed about the status and progress of the investigation in a transparent and comprehensible manner. If necessary, a joint decision can be made with the Whistleblower to find a mutually agreeable solution to the facts on which the report is based through dialog.

For clarifying the reported violation, the investigating division may in particular take the following measures:

- Questioning of the Whistleblower and other witnesses
- Interviewing the persons concerned or other persons named in the Report
- Obtaining information from function-holders and decision-makers
- Obtaining further advice, including external advice (e.g. from lawyers, matter experts, technical experts)
- On-site inspection (e.g. for reported environmentally relevant violations)

4.3 Remedial measures and investigation report

Based on the (possibly joint) discussion of the facts and in exchange with the Whistleblower, a recommendation on suitable remedial measures is made in the final investigation report. If necessary, an agreement on compensation is also reached. The remedial measures developed must be implemented and followed up by the responsible management. Remedial measures may include, but are not limited to

- Adaptation of processes
- Labor law measures against responsible persons

- (Further or renewed) training
- Adjustment of the risk assessment
- Development of a remedial concept and action plan together with affected suppliers

4.4 Review of the remedial measures

Remedial measures taken are reviewed regularly and on an ad hoc basis for their effectiveness and sustainability. If CGI comes to the conclusion that the remedial measures taken were inadequate or were not implemented effectively, appropriate adjustments are made, and further measures are implemented if necessary.

5 Effectiveness control

CGI carries out annual and ad hoc reviews of the effectiveness of the procedure. If it proves necessary, adjustments and changes are made to the accessibility and procedure of the complaints process. Where possible, Whistleblowers are interviewed about their satisfaction with the process and outcome of the investigation as part of the effectiveness review.

A structured analysis of risks in the supply chain is also carried out annually and on an ad hoc basis.

6 Documentation and publication

As part of its reporting obligations under the LkSG, CGI regularly publishes information on the number of reports received, the topics of the reports received and the conclusions drawn from the reports. The information is always published in anonymized form without mentioning names.

Version	Date	Author	Release	Description
V1.0	17.04.2023	Dr. Thomas Ludwig	Management	First version
V1.1	24.02.2025	Frank Michels	Human Rights Officer	Updates on the recipient of the complaint and the Human Rights Officer and clarification of the procedure
V1.2	19.11.2025	Frank Michels	Human Rights Officer	Chapter 1.2 – Reference to free notification Chapter 4.1 – Addition regarding immediate/prompt

