

Modern Slavery

Report on Fighting Against Forced Labour and Child Labour in Supply Chains

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CGI

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About this report

Modern slavery is a broad umbrella term, encompassing a range of coercive and exploitative practices, such as forced labour, human trafficking, forced marriage, child labour and debt bondage. For the purposes of this report, we often refer to “modern slavery” as we believe all forms of coercive and exploitative practices should be acknowledged and addressed but are deemed to include forced labour and child labour.

As a global company operating in multiple countries with diverse cultures and local regulations, and as a buyer with more than 14,500 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 requirements in which we operate.

This report outlines our global approach to the prevention and reduction of risks associated with all forms of modern slavery, as well as our established commitment to providing safe and fair working conditions for all our consultants and professionals—whom we now call CGI Partners as a vast majority are also company shareholders. This reflects that they are not only employees or workers but participants in the business and in contributing to its success. Being a CGI Partner also empowers them to integrate socially responsible and ethical business practices throughout our organization, and in the way we work with our suppliers.

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 relationship model complemented by a global delivery network that helps clients digitally transform their organizations and accelerate results.

In Canada, we are a major employer with more than 12,000 consultants and professionals and 33 offices. We serve clients across many industries, from financial services to government, health and life sciences, communications, energy and utilities, manufacturing, and retail and consumer services. CGI’s main operating subsidiaries in Canada are Conseillers en Gestion et Informatique CGI Inc., CGI Information Systems and Management Consultants Inc., CGI Payroll Services Centre Inc., and CDSL Canada Limited (collectively, “CGI Canada”), each of which is directly or indirectly wholly-owned by CGI.

Policies in relation to forced labour and child labour

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.

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 through CGI policies which govern the way we conduct business. Our Respectful Workplace Policy, adapted to each geographical area to be as close as possible to local realities, 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. In 2025, we have received the 'Gold' rating, with a score of 74/100, which places us in the top 2% of companies in the computer services, consultancy and related activities industry for our performance on sustainability.

Recruitment and career development

Our commitment to high standards of human rights is reflected throughout our recruitment practices and onboarding process. In Canada, CGI employment contracts and policies include the following provisions:

- Freedom of CGI Partners to terminate their employment with us at any time;
- Freedom of movement; and
- Protection from any form of violence, harassment, discrimination and retaliation in the workplace.

At the global level, they also include

- The opportunity for all CGI Partners to exercise their individual data protection rights as granted by applicable legislation in the regions where we operate

A commitment to pay transparency and equitable compensation practices, ensuring the valuable contributions of CGI Partners to our organization's success.

We also verify that prospective employees are legally able to work in their respective countries and conduct appropriate right to work checks.

A good portion of our recruiting is done through our managers and CGI Partners referrals reducing the dependency on recruitment agencies. However, 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 CGI Partner Partnership Management Framework (PPMF) 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.

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 was updated in 2022 to reinforce our principles of human rights protection, more specifically as they pertain to modern slavery. Section 1.7 of our Code of Ethics was amended to add the following statement: **"CGI recognizes that slavery is both illegal and unacceptable. 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 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."**

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 acquire 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.

Activities and supply chains that carry a risk of forced or child labour

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.

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.

In 2023, we have 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.

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.

Assessing effectiveness

We use a number of key performance indicators to assess the effectiveness of our actions, such as the number of suppliers evaluated and the percentage of completed trainings 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. In 2025, we achieved our target of having 70% of these significant suppliers assessed by EcoVadis on their social and environmental performance, business ethics, and sustainable procurement performance.

The evolving geopolitical and security landscape has grown increasingly intricate, prompting governments worldwide to employ sanctions as a means of protecting their national security interests. In 2022, we further strengthened our risk mitigation process by undertaking restricted and denied-party screening on all active suppliers to understand these risks. We will be integrating this process into our Third-Party Supplier Portal to screen all new suppliers against sanction lists, along with ongoing monitoring.

In parallel, we use EcoVadis IQ Plus to conduct a preassessment, of all our existing or new suppliers, based on the industry and country in which the supplier operates. This additional clearance enables us to work with the supplier to resolve any challenges identified. The system pre-screens suppliers using data mining to understand individual supplier risks. Using the data from the searches, suppliers that have been identified as high risk are requested to complete EcoVadis assessments to provide additional information.

Training

In 2025, we reinforced our commitment to embedding ESG considerations into procurement by advancing the knowledge and engagement of our Procurement team. Building on progress made in previous years, we implemented a structured approach to ESG training that is now integrated into our team's annual performance objectives.

As of this year, every member of the Procurement team is required to complete at least one ESG-related training course of their choice, aligned with their responsibilities and interests. This initiative is designed to strengthen individual ownership of ESG topics and ensure that all team members are equipped to identify, assess and address ESG risks and opportunities throughout the procurement life cycle. Topics covered range from responsible sourcing and environmental impact to human rights due diligence, modern slavery and circular economy principles.

This targeted learning complements the foundational ESG content included in our onboarding curriculum for CGI Partners, which provides guidance on supplier ESG assessments, with a specific focus on the EcoVadis methodology and rating system. New team members are also introduced to the broader significance of ESG performance through our supplier selection and monitoring processes.

We review the content of our onboarding training regularly to ensure alignment with emerging regulations and evolving ESG challenges.

These cumulative efforts reflect CGI's ongoing ambition to professionalize and operationalize ESG throughout our procurement function. By developing internal capabilities and embedding ESG principles into both individual goals and organizational processes, we enhance the resilience, accountability and sustainability of our global supply chain.

We introduced training on combating modern slavery, which is available to our consultants and professionals worldwide through CGI Academia. In 2025, more than 10,300 CGI Partners completed this voluntary training.

Remediation policies and processes

CGI Partners and suppliers are required to raise concerns about any issue or suspicion of modern slavery 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.

Governance

CGI's Board of Directors is responsible for the overall stewardship of our company and oversees our ESG initiatives and commitment, including with respect to human rights. It sets the tone for, oversees, and monitors our culture of integrity and compliance through our Code of Ethics and other policies. The Board of Directors oversees and approves the strategic plan related to top and emerging risks affecting CGI and satisfies itself as to the effective management of those risks. In accomplishing its mandate, CGI's Board of Directors may delegate certain aspects of its authority and responsibilities to committees or management, and reserve certain powers to itself.

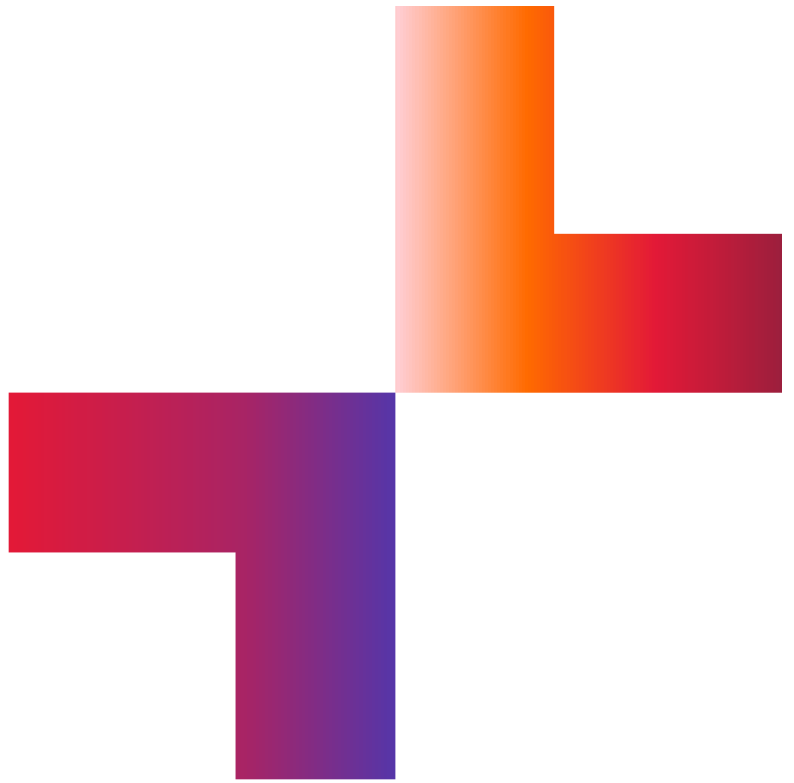
While the Board of Directors Reviews and approves material ESG public disclosure, the Corporate Governance Committee of the Board of Directors reviews the company's ESG strategies, objectives, policies, and practices, receives presentations on regulatory developments, and elevates matters to the Board of Directors as appropriate. The Audit and Risk Management Committee of the Board of Directors reviews the impact of significant risks and uncertainties affecting CGI and provides recommendations to the Board of Directors for the effective management of those risks.

The company's ESG Executive Steering Committee (ESC), which is comprised of leaders across CGI, oversees that our actions align with our ESG objectives and commitments, including in our approach to modern slavery. In preparation for this report, a presentation was given to the ESG ESC to equip our leaders with a comprehensive understanding of the modern slavery legal framework, compliance requirements and ethical considerations.

Day to day management of the company's approach to modern slavery is delegated to a working group that includes members of various internal teams, including Procurement, Corporate Legal, Ethics and Compliance and ESG.

This report is for the 2025 fiscal year (1 October 2024-30 September 2025) and is published pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act). It constitutes CGI and CGI Canada's updated joint report under the Act and all of CGI's policies, practices and procedures described herein apply to CGI Canada. The first report is available on cgi.com.

December 2025



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