CGI

Modern Slavery Act transparency in supply chains

Statement for financial year ending 30 september 2025

About us

Founded in 1976, CGI is among the largest IT and business consulting services firms in the world. Across 21 industry sectors in 400 locations worldwide, our 94,000 professionals provide comprehensive, scalable and sustainable IT and business consulting services that are informed globally and delivered locally. We are a major employer, working in offices across the UK with around 8,260 CGI Partners. CGI IT UK Ltd 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 IT UK Ltd works with clients through a local relationship model complemented by a global delivery network that helps clients digitally transform their organisations and accelerate results.

As a people-oriented organisation operating in a variety of countries with diverse cultures and local regulations, we recognise human rights are fundamental. We are fully committed to respecting human rights throughout our operations and supply chain in accordance with United Nations (UN) guidelines, including the UN Guiding Principles for Business and Human Rights.

Our understanding of these rights is drawn from the Universal Declaration of Human Rights, and we strengthened our commitment in 2020 by becoming a signatory to the UN Global Compact (UNGC).

We uphold the 10 Principles of the Global Compact, including respect for human rights, and support the elimination of all forms of forced and compulsory labour. CGI Inc. is also a member of leading sustainability indices, such as the Dow Jones Sustainability Indices and FTSE4GoodAwards

CGI IT UK Limited

CGI retained a score of 96% on the UK Government's Modern Slavery Assessment Tool (MSAT) in 2025, reflecting strong alignment with the Modern Slavery Act, supported by robust policies, due diligence and training detailed in this report.

This year, at a global level, CGI Inc. achieved a 'Gold' rating from EcoVadis for our global sustainability performance, placing us in the top 5% of companies in the computer services, consultancy, and related activities industry category for our performance on sustainability. We are especially pleased by our strong thematic scores of 80/100 in environment, 82/100 in ethics and 83/100 in sustainable procurement.

CGI IT UK Ltd holds a Silver Social Value Quality Mark (SVQM), achieving a 100% mandatory compliance and a 90% compliance score. The accreditation is one of the most rigorously tested standards for social value in the UK, recognising organisations that are values-led and focused on creating positive outcomes throughout operations, supply chains and the environment.

Achieving Silver reflects our commitment to delivering meaningful impact, including our commitment to the fair treatment of staff and our ethical decision-making and responsible supply chain practices. The Demonstrate category achieved the highest score at 93.5%, reflecting strong evidence of effective implementation of plans and policies. Most significantly, CGI IT UK Ltd created the Ethical Business Forum (EBF), which is an initiative to share ideas and practices among CGI Partners and suppliers to foster the implementation of human rights standards and responsible sourcing practices. To this end, CGI IT UK Ltd has achieved the international standard for Collaborative Business Relationship Management Systems (ISO 44001) certification and integrated these our collaborative business relationship principles across supplier and partner relationships. ISO 44001 provides a structured framework for forming and maintaining partnerships based on transparency, shared objectives, and mutual benefit - principles that directly support our approach to ethical and sustainable supply chain management. A Joint Relationship Management Plan supports these efforts by defining objectives, monitoring progress and proactively managing risks. To strengthen measurement and accountability, a social value calculator has also been introduced across Strategic Business Units to quantify the economic and social impact of supporting smaller suppliers and social enterprises.

CGI IT UK Ltd takes a fully integrated approach to sustainability by ensuring that modern slavery risks are managed holistically alongside other environmental and social topics. This is reflected in our TCFD-aligned supply chain risk assessments, which incorporate social and modern slavery risks alongside climate-related impacts. As a member of recognised external frameworks, including the Responsible Business Alliance (RBA and the UN Global Compact UK, CGI leverages these standards to support consistent supplier assessment, SME engagement, and alignment with international best practice. By embedding modern slavery considerations across environmental and governance processes, rather than treating them in isolation, the Governance (G) pillar acts as a cross-cutting foundation connecting and reinforcing all sustainability efforts across the organisation. Detail on CGI's governance structures and processes are provided in Section 2.

CGI IT UK Ltd's integrated approach means that responsibility for human rights and ethical business practices is shared across multiple teams whose work has been externally recognised over the past year.

In 2025, CGI IT UK Ltd was shortlisted for the Reuters Global Sustainability Reporting Excellence Award and received recognition at the British Diversity Awards and Lens Awards for initiatives that promote inclusive culture, transparency and responsible business practices, reinforcing the systems, oversight and values that underpin our modern slavery risk management.

About our tenth Modern Slavery Statement

Modern slavery is a serious and heinous crime that we do not tolerate in any part of our business or supply chains. We actively endorse and support objectives to eradicate slavery, servitude, forced or compulsory labour and human trafficking. This statement is published pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes CGI IT UK Ltd.'s tenth Modern Slavery and Human Trafficking Statement, for the 2025 financial year (1 October 2024 - 30 September 2025).

This statement reflects our established commitment to providing safe and fair working conditions for all CGI Partners. It also reflects how we work with our suppliers to ensure socially responsible and ethical business practices are embedded throughout our organisation and beyond. The Statement is developed collaboratively cross CGI IT UK Ltd, drawing on data from the MSAT repository, the UK Modern Slavery Policy, the Code of Ethics, the Third-Party Code, ESG reporting outputs, and information from the Third-Party Supplier Portal, including EcoVadis assessments, materials from the RBA, and 360 Watch insights.

The CGI IT UK Ltd UK and Australia (UK&A) Sustainability Team leads the development of the Modern Slavery Statement, overseeing supplier engagement, ESG risk review, Modern Slavery Act legal compliance, accreditations and partner engagement, data analysis, policy reviews, risk governance and leadership of the CAP Working Group. The Statement is developed in consultation with internal stakeholders and the Board, ensuring alignment with operational insight and strategic oversight. UK&A Procurement provides supplier risk and onboarding data through the Supplier Portal and advises on mitigation through the CAP Working Group. UK&A Operations offers senior manages incident escalation and reporting to the UK&A Board, while UK&A Legal provides insights on ethics hotline reports, policy breaches, and overall compliance governance.

Governance and policies relating to Slavery and Human Trafficking

CGI IT UK Ltd has invested in developing a strong corporate culture that reflects our approach to business. These values include respect, objectivity and integrity, and a firm commitment to being a responsible business.

Our 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." Our efforts to drive social progress demonstrate that doing good in the world is a key part of our purpose.

Creating a sustainable future for operations and supply chains is a key pillar of CGI IT UK Ltd's strategy, to build long-term value for our clients, shareholders, CGI Partners and communities in which we live and work.

The following policies address various aspects of our modern slavery approach, demonstrating our commitment to reducing the risk in our operations and supply chains. These policies also support a wide range of business functions that interact with suppliers, ensuring modern slavery considerations are embedded into day-to-day decision-making across the organisation.

Environmental, Social and Governance (ESG) Policy

Our long-standing ESG Policy underscores our sustainable procurement policy objectives and dedication to human rights standards.

We are committed to supporting CGI Partners in addressing ethical concerns with an open-door policy and proudly collaborate only with partners and suppliers adhering to global human rights standards.

Modern Slavery Policy

Our Modern Slavery Policy, which was updated this year to include the governance structure that informs our policies, and formalise the EBF, covers our commitment to eradicating modern slavery and human trafficking in our business operations and supply chains. It outlines that the prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for CGI IT UK Ltd. Any member who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

It also states that CGI IT UK Ltd explicitly forbids the payment of worker-paid recruitment fees both directly for our own employees and for those employed in our supply chain, including our partners. It sets out our commitment to work collaboratively with suppliers to help them address any instances of modern slavery and support those impacted. CGI IT UK Ltd may terminate the relationship with suppliers, other individuals and organisations working on CGI IT UK Ltd's behalf if they breach this policy.

Our Modern Slavery policy strengthens CGI IT UK Ltd's work by providing clear guidance and oversight across key roles. Procurement managers, operating across multiple geographies, are better equipped to ensure that CGI UK IT Ltd suppliers adhere to these standards.

At the same time, supplier managers, responsible for onboarding suppliers, benefit from structured processes that address high-risk suppliers through the CAP forum, while engagement and outreach foster collaboration and responsible practices throughout the supply chain. Together, these measures help us ensure ethical standards are embedded consistently across the organisation.

Our direct operations

Our Code of Ethics

All CGI Partners are required to acknowledge that they have read and understood CGI IT UK Ltd's Code of Ethics on an annual basis. Through the signing of this code, CGI Partners agree to treat all persons with respect and integrity, and to respect human rights in every aspect of our business, along with other aspects relating to business conduct and governance. CGI Partners 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.

Living Wage

We are committed to paying all our people fairly and recognising their valuable contribution to the success of our business. We have been an accredited Living Wage employer since 2019. This applies to all our directly employed CGI Partners, as well as contractors regularly working on CGI IT UK Ltd premises, such as our cleaning staff.

In our supply chain

Procurement policy

The CGI Procurement Policy is designed to support compliance with legal, regulatory, ethical, labour, human rights, and related obligations as a responsible business. The Policy defines the responsibilities of all CGI Partners who conduct procurement activities. It outlines that CGI Partners must adhere to all CGI policies and processes that relate to suppliers. CGI Partners must also conduct procurement activities in accordance with CGI standards of business ethics – as outlined in the Code of Ethics and Business Conduct. 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. We work to ensure that the organisations we work with and that support our organisation are aligned with CGI's vision and goals.

Third-Party Code of Ethics

We will only procure from suppliers that adhere to 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 while mitigating any adverse impacts.

The Third-Party Code of Ethics contains requirements concerning minimum wage, safe working conditions and internationally recognised labour standards. It also specifies that suppliers must under no circumstances use, or in any other way benefit from forced or involuntary labour. Compliance with CGI's Third-Party Code of Ethics is embedded within our standard terms of business and suppliers are required to adhere to these when supplying goods and services. Standard terms and conditions of purchase and subcontractor agreements also make specific reference to human trafficking and anti-slavery laws. Through these requirements, suppliers and subcontractors are informed that failing to comply with the agreement's terms or report breaches of anti-slavery or human trafficking laws may lead to contract termination. This includes potential and actual breaches or suspected instances of slavery or human trafficking in a supply chain related to a purchase. CGI IT UK Ltd ensures we have a right to audit suppliers and subcontractors to verify compliance.

Strengthening supplier compliance

In 2025, CGI enhanced our supplier policies and governance frameworks to drive compliance improvements, particularly among high-risk SMEs. Updates clarified expectations for responsible sourcing, modern slavery risk management, and third-party ESG assessments, while establishing a structured escalation process to ensure accountability. The EBF translated these policies into practical guidance, providing sector-focused roundtables that supported suppliers in understanding standards, evidence requirements, and corrective action processes. Where suppliers remained non-responsive, the CAP Working Group escalated concerns, with letters from the UK & Australia President sent to high-risk suppliers representing around 8% of UK spend. As a result, two major SME suppliers in facilities management and operations completed EcoVadis assessments and achieved bronze ratings, demonstrating how strengthened policies can deliver tangible improvements in supplier compliance.

How policies are developed, monitored and enforced (L2)

Our modern slavery policies are developed in consultation with internal and external stakeholders to ensure a thorough and informed approach. Internally, all policies draw input from Legal, Operational, Procurement and Sustainability leaders, and are overseen by a cross-functional Social Sustainability Working Group that coordinates updates and discusses ESG-related improvements in consultation with senior management. Proposed changes are approved via the CAP Working Group, which oversees the identification and mitigation of modern slavery risks across the supply chain[1].

Policies are reviewed annually using feedback from both internal and external stakeholders. Updates are presented to the ESG Executive Steering Committee to ensure that the CGI's actions continue to align with our legal obligations and broader ESG commitments. This year, Social Enterprise UK advised on the inclusion of smaller suppliers and voluntary community and social enterprises in CGI's social value strategy.

CGI IT UK Ltd enforces our modern slavery policies through structured governance, active supplier management, and continuous evaluation processes. Enforcement involves several mechanisms including regular supplier monitoring, issuing corrective action plans for insufficient ESG engagement or performance, and direct engagement from senior leadership when necessary. If suppliers do not improve within jointly agreed timelines, cases are escalated to the UK&A Board by the Chief Sustainability Officer at which point, the UK&A President may make direct contact to secure commitments for improvement. Persistent non-compliance can ultimately result in the termination of the supplier relationship, reflecting CGI IT UK Ltd's dedication to continual oversight and risk management[2].

Our policies apply to all persons working for CGI or on our behalf, including Board directors, officers, executive management, members, and business partners. Training and communications, delivered via the CGI intranet, run year-round, to ensure broad awareness of the indicators of modern slavery and reporting processes are required to complete mandatory learning, with updated ESG training provided to new joiners to reinforce roles and responsibilities in preventing exploitation[3].

Our policies in practice

CGI IT UK Ltd has formalised and strengthened several aspects of our supplier engagement and responsible sourcing policies. Our Procurement and ESG teams focus on suppliers that may face higher risk due to sector, geography, or labour practices and are required to complete an annual third-party ESG assessment, such as EcoVadis or the RBA. For Tier 2+ suppliers, we use the Critical Minerals Map and AI-based monitoring to identify and manage risks more effectively.

CGI's standard terms and conditions of purchase continue to explicitly reference human trafficking and slavery laws, including the obligation for suppliers to immediately report any actual or suspected cases of slavery.

This year, by formally referencing our assessment tools and technologies, as well as the EBF in our policies, we secured board-level support to continue these initiatives.

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[1] For more information, see section 2.7 on Governance
[2] For more information, see section 4.3 on Engagement with high-risk suppliers.
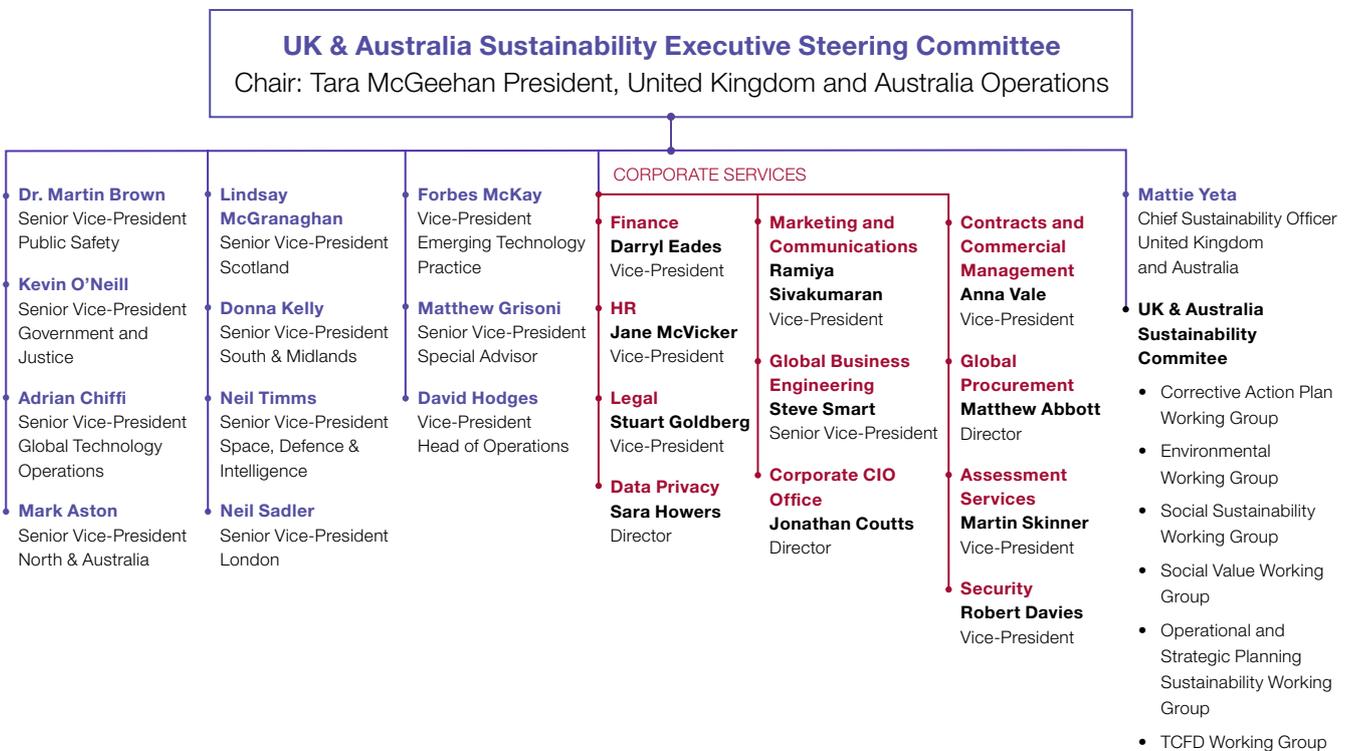[3] For more information, see section 5 on Training and capacity building

Governance

This year, CGI IT UK Ltd launched the Enterprise Risk Review (ERR), a board-level forum comprising our Board of Directors and Chief Sustainability Officer (CSO), which meets monthly to review risks and progress across the organisation. The ERR oversees CGI's ESG commitment, ensuring that modern slavery policies and statements comply with legal and ethical requirements and that all employees adhere to these standards. All modern slavery activities are reported by the CSO through the ERR, which is chaired by the President for the UK and Australia and attended by the Board of Directors.

The Board of Directors' Audit and Risk Management Committee receives a quarterly ethical incidents report, while our Corporate Governance Committee is informed of any significant changes to modern slavery regulatory or legislative reporting requirements. This formal oversight mechanism ensures that our initiatives are monitored at the highest level and reflects CGI's ongoing commitment to robust risk management and ethical business practices

The UK Board has appointed Mattie Yeta, Chief Sustainability Officer UK, to lead CGI IT UK Ltd.'s response to modern slavery.

CGI IT UK Ltd Governance Structure

UK & Australia Sustainability Executive Steering Committee
Chair: Tara McGeehan President, United Kingdom and Australia Operations

Dr. Martin Brown
Senior Vice-President
Public Safety

Kevin O'Neill
Senior Vice-President
Government and
Justice

Adrian Chiffi
Senior Vice-President
Global Technology
Operations

Mark Aston
Senior Vice-President
North & Australia

Lindsay McGranaghan
Senior Vice-President
Scotland

Donna Kelly
Senior Vice-President
South & Midlands

Neil Timms
Senior Vice-President
Space, Defence &
Intelligence

Neil Sadler
Senior Vice-President
London

Forbes McKay
Vice-President
Emerging Technology
Practice

Matthew Grisoni
Senior Vice-President
Special Advisor

David Hodges
Vice-President
Head of Operations

CORPORATE SERVICES

Finance
Darryl Eades
Vice-President

HR
Jane McVicker
Vice-President

Legal
Stuart Goldberg
Vice-President

Data Privacy
Sara Howers
Director

Marketing and Communications
Ramiya Sivakumaran
Vice-President

Global Business Engineering
Steve Smart
Senior Vice-President

Corporate CIO Office
Jonathan Coutts
Director

Contracts and Commercial Management
Anna Vale
Vice-President

Global Procurement
Matthew Abbott
Director

Assessment Services
Martin Skinner
Vice-President

Security
Robert Davies
Vice-President

Mattie Yeta
Chief Sustainability Officer
United Kingdom
and Australia

UK & Australia Sustainability Commitee

- Corrective Action Plan Working Group
- Environmental Working Group
- Social Sustainability Working Group
- Social Value Working Group
- Operational and Strategic Planning Sustainability Working Group
- TCFD Working Group

The day-to-day management of CGI IT UK Ltd's approach to modern slavery is delegated to a cross-functional Social Sustainability Working Group composed of leaders from Legal, Procurement, Sustainability and the ESG team, including a dedicated Head of Governance. The Social Sustainability Working Group ensures a co-ordinated approach to addressing modern slavery and oversees the development of ESG-related policies and strategies with senior stakeholders, including on tackling modern slavery and driving better outcomes in our supply chain. Responsibility for setting goals, KPIs, and tracking implementation lies with the UK&A Sustainability Team, supported by the UK&A President and the CAP Working Group, ensuring clear accountability and progress monitoring. Management at all levels ensures that staff understand and comply with modern slavery policies, and that significant risks are appropriately escalated through the Enterprise Risk Management system for board-level review.

Oversight for the proactive identification and management of modern slavery risks in our supply chain is provided by the CAP Working Group, which meets regularly for ongoing monitoring and evaluation of supplier engagement strategies and remediation measures. The CAP Working Group is composed of senior leadership including the Chief Sustainability Officer, UK and Australia Procurement Director and the Vice President Head of Operations, members of the Social Sustainability Working Group and the Legal team.

Our Governance in practice

This year, CGI IT UK Ltd reached a key governance milestone with the completion of the Home Office TISC Level 1 and Level 2 gap analysis in June. The findings were presented to the ERR Board and CAP Working Group, providing a forum for discussion and reflection on current policies and processes. Insights from this review directly informed the decision to integrate our supplier engagement approach via the ERR Board, empowering it to make decisions around suppliers, as well as formalising the EBF as an escalation route for supplier engagement.

Organisational structure, business and supply chains

CGI structure and operations

We know that modern slavery exists in many different sectors across the world, including here in the UK and in the delivery of the products and services we procure. Recognising that companies can be unaware of modern slavery in their supply chain, we know we need to be both collaborative and iterative in how we identify and address the risks throughout our operations and supply chain.

As a services organisation, where the majority of our employees are highly skilled and are contracted directly by our company, we consider the risk of modern slavery and forced labour within our workforce to be low.

Most of the suppliers used to directly procure products and services for CGI IT UK Ltd and our clients are UK-based organisations, which account for 95.3% of supplier spend. 2% of spend is associated with suppliers based in the US, 0.44% in Ireland and 0.4% in Canada. The top five categories of CGI IT UK Ltd procurement spend include Professional Services (23%), IT Contingent Labour with a CGI timesheet (17%), Hardware (8%) and Software Subscriptions and Third-Party Environments (both 6%).

Supply chain mapping

CGI IT UK Ltd takes a risk-based and tiered approach to mapping our supply chain. We recognise mapping as a critical step in identifying and managing modern slavery risks, enabling targeted engagement with high-risk suppliers and improving our visibility into deeper-tier supply chains, beyond Tier 1. This approach is supported by our strengthened governance introduced this year, including weekly Supply Chain Working Group meetings, and risk enterprise risk reviews which are attended by the CEO and Board of Directors. As a result, our supplier mapping has consistent cross-functional and executive oversight.

To establish baseline supplier data - understanding who our suppliers are and where they operate - we utilise a third-party portal to onboard our suppliers. As part of this process, suppliers complete a comprehensive questionnaire that captures information on business operations and size, geographic locations, industry activities and ESG practices, such as living wage commitments and diversity profiles.

These questionnaires are reviewed monthly, with support from AI tools, to efficiently identify and prioritise high-risk suppliers for further engagement. This has enhanced our mapping of direct suppliers by providing a deeper insight into their operation and locations and enabling a better overall understanding of upstream activities.

Recognising that some suppliers may have a limited capacity to manage modern slavery risks, this year we increased our one-to-one engagements with SMEs, which have occurred alongside our usual quarterly supplier meetings[4]. This support enables them to better understand their own risk landscape and enhances their ability to continue mapping their own supply chain.

To strengthen our visibility across high-risk sectors, we also require suppliers in the hardware procurement category to disclose value chain information - including details of their facilities and manufacturers. In FY25 we strengthened our oversight by working with the RBA to establish trading relationships with hardware manufacturers in our supply chain. The RBA conducted third-party facility assessments, and through this engagement, we gained greater visibility of the resulting ratings and reports across geographies including China, Thailand, Poland, and the US, where some of our products are manufactured.

Building on our commitment to innovate and develop new technologies aimed at addressing modern slavery, we have used our critical minerals tool to continue improving our understanding of our supply chain structure. This year we have expanded the tool's critical minerals map to include nature-related risk layers, such as water stress and broader environmental risks in identified higher-risk geographies such as China, Thailand and Poland. This enables us to link these factors to social outcomes that can increase vulnerability to modern slavery, such as displacement, geopolitical disruption and child labour.

Collectively, these efforts contribute to improving the visibility of upstream supply chains and strengthen our overall supply chain mapping.

Labour Supply Chain

CGI IT UK Ltd recognises that labour supply chains, particularly in infrastructure, facilities management, and IT services, represent a key area of modern slavery and ethical risk. The majority of CGI's labour-related spend is in the UK and we consider the effective oversight of these relationships critical essential to maintaining ethical standards and safeguarding worker rights.

To map and manage risk, CGI IT UK Ltd's EBF engages regularly with labour suppliers, with a particular focus on subcontractors in the UK providing IT and computer programming services. Through EBF roundtables and ongoing touchpoints, CGI IT UK Ltd gains visibility of the nature of work, the companies supplying labour, and the governance processes suppliers have in place. Where recruitment agencies are used to source specialist skills, they are evaluated to ensure compliance with CGI's standards and policies. All individuals engaged through these suppliers undergo right-to-work checks, adhere to CGI's Code of Ethics, and are subject to standard compliance measures. CGI IT UK Ltd also partners with the RBA to manage labour risks associated with the manufacturing and deployment of hardware and IT equipment, in line with CGI IT UK Ltd's broader supply chain risk management approach.

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[4] For more information, see section 5.3: Supplier capacity building

Risk assessment and management

Every year, CGI IT UK Ltd conducts an assessment to identify areas with the highest likelihood of modern slavery risks. This risk-focused evaluation guides the targeted actions we implement to effectively mitigate and manage risks across our business and supply chain.

Table 1: Risk overview

Risk area	Risk analysis	Mitigating actions
Own operations	• As a services organisation, the vast majority of CGI Partners are highly skilled and are recruited and contracted directly by CGI IT UK Ltd. On this basis, the overall risk of modern slavery within our direct workforce remains very low. However, we recognise that relative risk can be higher in certain lower-paid and lower-skilled roles, including reception, facilities management and security services, where labour markets are more fragmented and workers may be more vulnerable to exploitation if oversight is limited.	• We continue to in-source higher-risk services in lower-paid roles where possible, increasing CGI IT UK Ltd's direct oversight and reducing reliance on third-party labour models associated with higher risk. • Recruitment practices are governed by robust HR controls, including right-to-work checks, contract transparency and freedom to terminate employment. • Modern slavery awareness is reinforced through mandatory Partner training, supported by regular communications and escalation routes via our ethics hotline and incident response process.
Supply chains	• The majority of CGI IT UK Ltd's supply chain spend continues to be with UK-based suppliers, with only a small proportion of goods and services sourced from geographies recognised as higher risk for modern slavery. • We recognise, however, that risk is driven by the nature of goods and services, not geography alone. Certain categories within our supply chain present relatively higher exposure, including electronics, hardware manufacturing and lower skilled labour-intensive services, where risks may exist deeper in the value chain beyond Tier 1. • In FY25, our risk assessment also identified that labour supply chains supporting large client contracts, including contingent and subcontracted IT services, require continued monitoring to ensure transparency of employment practices and recruitment routes.	• Suppliers operating in higher-risk geographies and/or providing higher-risk goods or services are required to undergo enhanced due diligence, including independent third-party ESG assessments such as EcoVadis or RBA audits. • We take a proactive engagement approach with higher-risk and significant suppliers through one-to-one meetings, CAPs and targeted capacity-building delivered via the EBF. This approach prioritises remediation and continuous improvement over disengagement. • To strengthen visibility beyond Tier 1, we have continued to develop our critical minerals mapping tool, integrating environmental and social risk indicators to identify upstream vulnerabilities linked to forced labour, child labour and worker exploitation. In FY25, this tool was expanded to include nature-related risk layers to better understand how environmental stressors may increase labour vulnerability. • Ongoing monitoring is supported through supplier questionnaires, AI-assisted risk screening validated by human review, sustainability intelligence alerts, and escalation through the CAP Working Group where risks or incidents are identified.

During this financial year, a total of 445 suppliers were requested to complete or be reassessed via a third-party ESG assessment based on their high modern slavery risk rating. In total, 380 suppliers completed an assessment, representing 85% of those requested. This compares to a 73% completion rate in 2024.

We recognise that several high-risk suppliers who do not complete third-party ESG assessments are SMEs and that they typically face greater resource and financial constraints in achieving ESG compliance in the assessment process[5].

88% of high-risk suppliers that completed an assessment were rated as 'good' for human and labour rights (scoring 45 and above on the EcoVadis or third-party equivalent module) representing 92% of high-risk spend assessed. The percentage of suppliers rated as insufficient in line with our updated threshold (scoring below 45) on labour and human rights was 12%. These suppliers are currently being engaged through the EBF to improve their scores, with progress regularly monitored by the CAP Working Group. No suppliers score below 25 for labour and human rights. The Supplier CAP Working Group facilitates proactive measures to be taken with suppliers to encourage continuous improvement. This is underpinned by EcoVadis and RBA corrective action plans which are discussed with suppliers and used as one of the tools to improve performance.

Risk identification

Risk assessment in our CGI IT UK Ltd operations

While the risk of modern slavery occurring in CGI IT UK Ltd's own operations is considered very low, we recognise the importance of taking steps to prevent and mitigate harm from occurring.

Our commitment to high standards of human rights is reflected throughout our recruitment practices and onboarding. These are based on principles of fair recruitment, such as the freedom to terminate employment and protection from any threat of violence, harassment, and intimidation in the workplace.

We ensure prospective employees have the right to work in the UK and conduct appropriate right-to-work checks.

We have a preferred list of recruitment agencies that we work with and conduct due diligence to ensure we only work with reputable agencies. We also include specific references to the Modern Slavery Act 2015 in contractual agreements with all recruitment agencies.

Our HR systems and processes are built to prevent debt bondage, which occurs when people are forced to work for an employer to pay off debts, ensuring no employee is allowed to work in exchange for a debt. We have taken steps to in-source higher-risk services, such as cleaning, catering and security, to increase oversight of potential modern slavery risks. As a result, CGI IT UK Ltd has minimal contractors employed on site in the lower-skilled sectors which represent a greater risk of labour exploitation and modern slavery.

In addition, external human rights and modern slavery specialists support CGI IT UK Ltd's working groups to enhance due diligence processes and risk mitigation strategies, ensuring our governance is comprehensive and responsive to evolving compliance obligations.

Risk assessment in our operations in 2025

Our 2025 risk assessment across our operations found that no aspect of our activities presents a high risk of modern slavery. However, we recognise that certain areas, while still considered low risk, may carry relatively higher exposure than others. The review confirmed that our existing policies, controls, and monitoring processes outlined above remain proportionate and effective in monitoring and pre-empting these risks.

Risk assessment in our supply chains

Identifying and assessing new suppliers

ESG performance is considered when evaluating and selecting new suppliers during the tender process. Suppliers' commitment to continuous improvement is one of nine criteria used by the global procurement team to assess suppliers. Questions on ESG and labour and human rights are included in all competitive UK tenders, which are assigned a minimum 10% weighting.

CGI conducts due diligence for new suppliers through a targeted, risk-based approach that is integrated into the procurement process.

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[5] For more information on how CGI supports SME capacity building, please see section 5.3: Supplier Capacity Building

All new suppliers are required to complete a questionnaire on their ESG practices via the Third-Party Supplier Portal, which assesses whether they 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. The questionnaire also assesses suppliers' commitments and policies on labour and human rights, drawing on input from human rights experts and data from the Global Slavery Index, in alignment with criteria from the RBA standards.

Our standard UK Request for Proposal templates include ESG questions suppliers must answer to ensure they are in compliance with the RBA's Code of Conduct, the principles of which are based on internationally recognised standards including the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. This includes questions on the manufacturing and extraction processes of suppliers, as well as the structure of employment to better understand the supplier's oversight of directly and indirectly contracted employees.

Our Risk Assessment Tool is applied to identify onboarded suppliers at higher risk. Subsequently, these identified suppliers are requested to complete further due diligence, including third-party ESG assessments. For example, in high-risk sectors like construction, suppliers complete an enhanced ESG questionnaire, receive third-party assessments, and demonstrate commitments such as paying the living wage. These evaluations also provide insights on operational management and supply chain oversight of modern slavery risks, highlighting areas for improvement which are reviewed annually. For more information on our heightened due diligence, see section 4.3.

Identifying and assessing existing suppliers

Our Third-Party Supplier Portal is used to assess supplier's exposure to, and management, of modern slavery risks. All suppliers complete an ESG questionnaire when onboarded, questions 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. The questionnaire also assesses suppliers' policies and commitments on labour and human rights.

This was developed with input from human rights experts using data from resources such as the Global Slavery Index. As a result of discussions facilitated by the CAP Working Group, in 2024, we updated the questionnaire to include additional ESG assessment criteria relevant to the RBA. All suppliers who are assessed as high risk are required to complete a third party ESG assessment to determine if further due diligence is needed and undergo annual reviews.

To strengthen the assessment of modern slavery risks in our supply chains, in 2024, we successfully integrated an AI-based tool in our Third-Party Supplier Portal to complement the ESG questionnaire. This tool generates an initial screening of our supplier base against ESG criteria, providing real-time insights and eliminating the need to wait for supplier information, while offering additional analysis to identify where further due diligence is needed. This is particularly valuable for identifying the risks faced by SMEs, which are often constrained by limited resources.

All AI assisted screening outputs are validated through a human review of publicly available supplier data, documentation and information gathered through standard onboarding checks. CGI IT UK Ltd does not depend on AI to generate a final risk rating, but rather to surface potential risk indicators to inform proportionate follow up. For flagged suppliers, we proactively offer EBF training and tailored guidance on assessment options.

While this targeted insight has enabled proactive engagement with suppliers, we recognise the inherent constraints of AI tools, particularly where supplier data is sparse. Many SMEs do not publish detailed reports and relying solely on headquarters location may not reveal risks deeper in supply chains. For suppliers in the hardware sector identified as highest risk, we consult RBA audit reports and monitor remediation activities.

We continue to increase visibility of working conditions in our supply chain, including through education of the RBA Worker Voice Platform through the EBF. This includes worker voice programs such as a survey, on-site assessment support and mobile learning. We continue to review best practice and guidance from the RBA to gain deeper insights into the perspectives of supply chain workers on how they are treated. This enables us to make improvements to our processes where necessary.

Our annual modern slavery risk assessment is used to identify suppliers operating in high-risk countries or providing goods and services that are at higher risk for modern slavery, such as facilities management services or IT products. Subsequently, these identified suppliers are requested to complete further due diligence, as outlined in section 4.3.
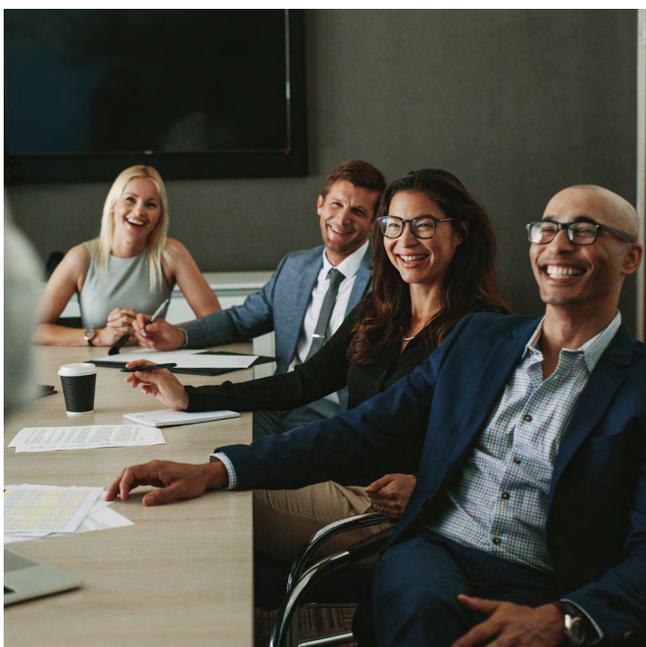
How we engage with our suppliers

CGI IT UK Ltd engages with suppliers through a structured programme designed to build capability, promote responsible practices, and maintain strong, long-term relationships across the supply chain. Supplier capacity building is delivered through EBF sessions and targeted one-to-one support, with a focus on audit readiness, setting realistic milestones, documenting evidence, and verifying closure of actions. CGI IT UK Ltd's Procurement and Sustainability teams jointly coordinate follow-up activities and maintain clear accountability for support and monitoring.

EBF roundtables provide a facilitated forum for open dialogue between suppliers and CGI IT UK Ltd teams on working-condition risks and emerging issues. Suppliers were supported in understanding how EcoVadis and RBA assessments operate in practice, how corrective action plans are verified and closed, and how to recognise and escalate operational red flags using CGI IT UK Ltd's due-diligence tools. In-person and virtual sessions also explored evolving UK and EU regulatory expectations and invited supplier feedback on CGI IT UK Ltd's Critical Minerals Map to ensure it supports responsible sourcing beyond CGI IT UK Ltd's own operations. Attendance, topics and feedback are monitored to ensure ongoing engagement remains relevant and responsive to supplier needs.

Discussions this year explored topics such as wages, worker representation, and the challenges faced by SMEs. Attendance and topic feedback are tracked to ensure future sessions remain relevant and responsive to supplier needs.

CGI IT UK Ltd also embeds ESG considerations into ongoing relationship management. A mandatory ESG weighting is applied in UK tenders and supplier relationship reviews are used to reinforce our preference for long-term, ethically aligned partnerships. Where risks are identified, CGI IT UK Ltd seeks to work collaboratively with suppliers through corrective action planning before considering disengagement. Key performance indicators including EcoVadis participation, minimum score thresholds, and completion of corrective action plans, inform decisions on continuing or deepening relationships.

Due diligence of high-risk suppliers

Our monitoring system and modern slavery risk assessment tools flag suppliers with an elevated risk profile whether due to their location or the nature of the goods and services they provide. These suppliers are asked to undergo a heightened level of due diligence, including additional sustainability assessments.

In line with our efforts to leverage technology to improve our processes, we also subscribe to a sustainability intelligence and monitoring system. The system proactively identifies risks associated with our suppliers based on sources from media, governments, trade unions, NGOs, and other business networks. In the event of a negative alert relating to a supplier supplying goods in the UK, our procurement team gets notified and works with the Supplier CAP Working Group and supplier manager to determine any mitigating actions. Any new orders raised with flagged suppliers will notify the Procurement team of the risks and prompt engagement with the supplier to assess and identify opportunities to strengthen corrective action plans to support compliance.

This year, two potential modern slavery risk related flags were identified. The Sustainability team undertook information gathering based on third-party guidance and reputable news sources, with findings reviewed by the CAP as part of the CGI IT UK Ltd's due diligence processes.

We aim to continuously strengthen our risk assessment, as well as regularly monitor and update the geographies, products or services categorised as high-risk to ensure our due diligence remains rigorous and proactive.

- **Geographies:** In addition to our list of 'high-risk' geographies, we maintain a 'high-risk watchlist' category for geographies considered to have an elevated potential of becoming high risk for modern slavery. Geographies on the watchlist prompt an additional assessment to help ascertain whether they warrant classification as high-risk. The assessment is conducted using sources such as the Global Slavery Index, Human Rights Watch, Amnesty International Country Reports, the International Trade Union Confederation (ITUC) Global Rights Index and the US Department of State 2024 Country Reports on Human Rights Practices.

This year, 0.12% of supplier spend came from geographies considered at high risk for modern slavery, primarily in IT and hardware sectors in five countries. Our identification of high-risk and watch-list geographies is informed by an annual review conducted in collaboration with an independent third party.

- **Products and services:** This year, we have focused on proactively engaging high-risk SMEs in industries including IT, recruitment and merchandise. CGI IT UK Ltd continues to expand visibility and traceability beyond tier one in higher risk hardware categories using our internal critical minerals map, as well as through close collaboration with the Responsible Business to map indirect suppliers and manufacturers. We worked with the RBA to increase the visibility of facility audits and self-assessment questionnaires, as well as to reach out to manufacturers directly, disclosing goods and tracing their manufacturing supply chains. Focusing on electronic hardware goods, this process enabled us to gain visibility into the specific facilities where these goods were produced globally.

For suppliers flagged as high risk for modern slavery, as well as significant suppliers who make up a large proportion of CGI IT UK Ltd's supply spend, we undertake enhanced due diligence using independent ESG assessments delivered through the RBA and the sustainability ratings agency EcoVadis.

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 considers 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 include employee health and safety, working conditions and social dialogue. The criteria within the human rights section include 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.

Suppliers must provide detailed evidence, including disclosure outcomes, to evidence the effectiveness of their approach.

Suppliers report on key performance indicators such as confirmed cases of modern slavery. CGI IT UK Ltd tracks the number of suppliers evaluated or audited. 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. High-risk suppliers are required to complete these assessments annually so we can continue to monitor and check their compliance with our human rights standards.

As of 2023, CGI IT UK Ltd expanded due diligence of suppliers classified as high-risk for modern slavery beyond EcoVadis to include equivalent third-party ESG assessments which suppliers may be better suited to, such as the RBA In particular, suppliers of electronic hardware and manufacturing equipment with known facilities are typically engaged through the RBA, which provides more detailed, facility-level audits. Leveraging the RBA's expertise in technology and electronics supply chains, we use the findings of RBA audits and non-conformances to the RBA Code of Conduct to prioritise engagement with suppliers.

How we engage high-risk suppliers

All suppliers with a score below 44 in their EcoVadis assessment are rated as 'insufficient' are proactively engaged to meet with CGI IT UK Ltd and discuss their assessment, exploring how we can collaborate to support them in implementing measures to enhance their performance. This is coordinated by the CAP Working Group, which draws on best practice guidance and industry tools including from the RBA and the OECD Guidelines for Multinational Enterprises. Scorecards and corrective action plans provided by EcoVadis and the RBA are also used to pinpoint strengths and weaknesses. Our direct engagement is further supported by collective initiatives through our EBF, which includes participation in awareness-raising events, workshops, and training sessions aimed at sharing insights and practical strategies for improvement[6].

If non-compliance persists after targeted support and engagement the CAP Working Group may issue formal warnings or increase monitoring.

Timelines for corrective actions are set according to the severity of the issue, the supplier's capacity for remediation, and the potential risk to affected individuals. CGI IT UK Ltd's governance framework categorises findings as critical, major, and minor non-conformances, each with indicative closure periods adjusted to context. Non-conformances are identified through a combination of supplier risk screening, targeted audits, and incident reporting.

We are committed to a partnership-driven strategy that focuses on supporting and building capacity among suppliers, as we believe this a more effective approach to mitigating the risks and prevalence of modern slavery. As a result, we will not immediately stop working with a supplier if a case of modern slavery is found. Similarly, if a supplier is flagged as high risk and fails to complete our third-party ESG assessment, we work with procurement managers to facilitate in-person meetings with suppliers to better understand their challenges.

As a last resort, when a supplier continuously declines to undertake our third-party ESG assessment or receives a low score and fails to sufficiently improve their practices despite our engagement, CGI IT UK Ltd will explore options for termination and working with alternative suppliers.

Grievance mechanisms and remedy

CGI IT UK Ltd's Ethics Reporting Policy emphasises that CGI Partners and suppliers are required to raise concerns about any issue or suspicion of modern slavery in CGI IT UK Ltd's direct operations or supply chain (at any level or tier) as soon as possible. They are also obliged to report any conduct that it believes in good faith to be an actual, apparent or potential violation of the Code of Ethics and Third-Party Code of Ethics. 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 IT UK Ltd encourages openness and will support anyone who raises genuine concerns, even if they turn out to be mistaken.

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[6] For more information, see section 5 Building

CGI IT UK Ltd is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any concern about modern slavery or cooperating in the investigation of a reported violation. Should a report prove to be unsubstantiated, this protection remains intact.

In compliance with our legal obligations, we handle every submission in a confidential manner and only disclose information to the extent necessary to facilitate a thorough investigation. We prohibit any CGI Partner with a conflict of interest, whether actual or perceived, from participating in ethics investigations and in decisions related to any remedial or disciplinary actions.

Our Modern Slavery Incident Response Plan outlines the steps we would take if an instance of modern slavery is detected or suspected within our business or supply chains. This sets out our commitment to working with suppliers to build their capacity to effectively manage and eliminate slavery, and support affected workers to access remedies. As a result, CGI IT UK Ltd will not automatically stop working with suppliers if a case of modern slavery is found but will cease activities where sufficient progress is not made within a reasonable timeframe.

In addition to the dedicated hotline, potential concerns or violations can be raised through established internal reporting channels or, where necessary, via relevant external authorities, such as emergency services in cases of immediate danger or appropriate law enforcement and labour-abuse reporting routes.

If modern slavery is suspected or reported, the Incident Response Plan provides a clear framework to ensure a safe, timely, and effective response. Concerns undergo an initial evaluation by the appropriate internal team and escalated through governance channels as required. Professional support is provided throughout to prioritise the safety and welfare of potential victims, protect confidentiality, and gather information appropriately. The response is then reviewed and monitored to assess effectiveness, strengthen controls, and prevent recurrence, including engagement with suppliers where relevant. The process is regularly reviewed to ensure its effectiveness and alignment with best practice.

In 2025, no potential modern slavery concerns were raised via the hotline or through other channels. Each case was investigated in line with the plan.

Where reports are confirmed, victims have access to specialist support and referral routes, including the UK National Referral Mechanism, and are engaged to determine appropriate remedies, whether financial, psychological, or ongoing support guided by external professionals.

Training and capacity building

Training for CGI partners[7]

Our Modern Slavery Policy sets out that the prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All CGI Partners are instructed to read, understand, and follow our Modern Slavery Policy, which also includes how to spot the signs of slavery. We recognise that building Partner awareness of Modern Slavery through training enhances our ability to identify and address modern slavery risks. As such, any updates to policies and training resources are shared with CGI Partners through internal communications and articles. This includes through internal campaigns such as Anti-Slavery Week.

CGI IT UK Ltd's Sustainability Learning Passport for Partners provides a central hub that allows colleagues to expand their learning opportunities and track their progress. The passport provides training on wider sustainability topics as well as specific modern slavery modules. These include internal resources on modern slavery and responsible sourcing as well as external trainings from partners such as the RBA. Specifically, materials from the RBA provide detailed guidance on labour and human rights, worker health and safety and environmental management and ethics. CGI Partners have access to their passports throughout their time at CGI IT UK Ltd and can tailor their learning to reflect their job role and interests.

In addition to training delivered through our partnership with the RBA, we engage with organisations such as the UNGC to offer external resources and support greater awareness of modern slavery and how to respond if it is suspected. We plan to continue holding forums with more of our external training partners to build our community of practice.

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[7] CGI Partners refers to CGI's internal employees across all roles and seniorities

Resources are also shared with CGI Partners around spotting the signs of modern slavery from organisations including the Gangmasters and Labour Abuse Authority (GLAA), a public body with the task of protecting vulnerable and exploited workers, and non-governmental organisations (NGOs) including Walk Free and Anti-Slavery International.

Targeted training – Procurement

All members of CGI Inc.'s global procurement team working on UK tenders, including the procurement council, are required to complete regular training on modern slavery to understand the risks of modern slavery occurring in the supply chain and how to address it. The training covers the ILO indicators of forced labour and the requirements of the UK Modern Slavery Act. It also covers how to consider modern slavery risks in procurement and relevant CGI IT UK Ltd policies and practices, including how to respond to suspected cases of modern slavery. This year, we maintained 100% of training completion among our procurement Partners, with access expanded to a wider range of CGI Partners, including supplier managers social value leads and roles that work directly with third parties.

Feedback gathered from previous years training informed updates to our Modern Slavery Policy and supporting materials. It provided clearer guidance on how partners should use the policy and reflect recent developments in government legislation and transparency expectations.

The training itself was also strengthened to give Partners a broader understanding of their role in identifying modern slavery risks across our operations and supply chain, expanding beyond the earlier focus on recognising signs of exploitations in individuals.

Supplier capacity building

CGI IT UK Ltd offers capacity-building activities to enable suppliers to proactively prevent and mitigate any adverse impacts associated with modern slavery.

In recognition of the resource constraints SME suppliers may face in completing a third-party ESG assessment, we look beyond the use of these assessments as a way of conducting due diligence. We continue to place a strong emphasis on proactively engaging high-risk SMEs in industries including IT, recruitment and merchandise. We adopt a tailored approach, meeting with suppliers to assess their current position and understand the resources they have for identifying and mitigating modern slavery risks. Through these discussions, we can offer targeted support and capacity-building initiatives to enhance their practices in addressing modern slavery. This helps us increase transparency and sustainable practices, while also promoting diversity throughout our entire supply chain.

Our direct engagement is further supported by collective initiatives through our EBF. We recognise our ability to support suppliers to mature their approach to modern slavery and wider ESG issues. CGI IT UK Ltd facilitates this support through a combination of in-person roundtables and online webinars providing practical due diligence guidance. We continue to build on previous supplier engagement, including last year's sessions for high-risk suppliers on managing modern slavery risks and guidance from the RBA on tools available through the Responsible Minerals Initiative

Across 2025, approximately 50 high-risk suppliers participated in this capacity building activities, representing CGI's UK, European and offshore supply chains. Sessions emphasised transparency, continuous improvement and practical tools to close corrective actions plans and improve visibility of modern slavery risks beyond tier 1.

A summary of our activities through the EBF

Name of training	Audience	Type of training	Description	Takeaways
"Third Party Accreditations – Moving Beyond Compliance"	Suppliers	Webinar	Suppliers gained practical insights into EcoVadis and RBA assessments, including the evidence required, corrective action planning, scoring criteria, risk alerts and how the frameworks differ, as well as CGI IT UK Ltd's minimum standards and expectations for audit closure.	Attendees received guidance on evidence preparation, score improvement and access to support for future accreditation submissions.
"Spotting the signs of Modern Slavery"	CGI Procurement and high-risk suppliers	Webinar	The session covered key operational red flags such as unrealistic bids, excessive hours or document retention, and demonstrated how to escalate and record incidents using CGI IT UK Ltd due diligence tools. This was aligned with evolving UK and EU legislative expectations and the Home Office requirement to show effectiveness in practice.	Suppliers received follow-up training resources and a maturity roadmap showing progression from L1 to L2 due diligence capability.
Child Labour, Critical Minerals and Modern Slavery Roundtable	CGI Partners and suppliers from industries including technology, construction, the public sector and academia	In person roundtable with the Centre for Child Rights and Business	Discussions focused on global due diligence and remediation frameworks under Corporate Sustainability Due Diligence Directive (CSDDD) This included approaches to identify child labour and modern slavery occurring deeper in the supply chain and a six-step approach to embedding child rights into supplier due diligence.	Attendees received guidance on understanding legislative requirements and practical methods to identify and integrate child rights into due diligence and the steps organisations can take to develop effective remediation plans should instances of child labour be discovered.

These initiatives are an integral part of how we build our suppliers' capabilities, providing them with the support, tools and guidance needed to strengthen responsible sourcing and address modern slavery risks. As part of our efforts to foster supportive partnerships in our supply chain, last year we successfully rolled out a supplier satisfaction assessment programme.

The programme establishes clear and consistent EBF communication channels, encouraging feedback from our suppliers regarding social value, ESG and our policies, onboarding and ongoing supplier management processes. It is designed to help us identify and implement improvements that will help us ensure an effective approach to partnering with our suppliers, while reducing risks and driving better outcomes for workers in our supply chain.

Assessing the effectiveness of our approach to modern slavery

We use a number of Key Performance indicators (KPIs) to assess the effectiveness of our actions to tackle modern slavery. Progress against these KPIs is outlined below.

KPI	Target	2024	2025
Risk identification and assessment			
Percentage of suppliers identified as high risk for modern slavery that have completed a third-party ESG assessment and the associated proportion of spend (this includes significant suppliers at higher risk of modern slavery).	N/A*	73% of these suppliers completed an assessment, representing 89% high-risk spend (2023: 67%, 94%)	85% of these suppliers completed an ESG assessment
Risk management and capacity building			
Percentage of CGI UK IT LTD Ltd's top 100 suppliers** directly engaged on sustainability topics, including modern slavery, to upskill and build supplier capacity, through the EBF and one-to-one meetings.	2025: 100%	60%	100%
Number of collective engagement activities organised through the EBF for Partners and suppliers to collaboratively address aspects of modern slavery and share best practice.	2025: 7	5	7
Learning and Development			
Percentage of CGI IT UK Ltd's targeted procurement Partners completing annual training on modern slavery through the EBF and other platforms***.	100%	100%	100%

*This metric reports our financial spend data, as a result we are unable to attribute a target to the KPI

**Top 100 tier 1 suppliers by spend, which are subject to change during and between reporting year(s)

***This KPI replaces our previous globally focused CGI Inc. learning and development KPI. This change reflects our UK focused efforts and ambition to hold ourselves to account for the upskilling of our UK procurement Partners and effectively report our progress.

We also committed to implementing the following initiatives:

Commitment made	Progress achieved to date
Governance	
Continuously evaluate and identify opportunities to improve internal governance processes that effectively manage our approach to modern slavery in our business and supply chain.	We strengthened the role of the CAP Working Group to advance our supply chain approach to modern slavery. Through this group, we initiated our prioritised supplier engagement strategy and set a higher benchmark for assessing supplier ESG and modern slavery practices to drive continuous improvement in our supply chains. These improvements are discussed in the relevant section. This year, CGI IT UK Ltd launched the ERR, a board-level forum comprising the Board of Directors and CSO, which meets monthly to review key risks and progress. The ERR acts as a formal escalation forum for the CAP Group, strengthening board oversight of modern slavery and broader ESG risks. Through this enhanced governance, CGI IT UK Ltd has taken a more coordinated and assertive approach to supplier engagement. Actions approved by the Board include a joint CEO and CSO letter requesting completion of third-party ESG assessments, an integrated approach to environmental and social risk assessments to streamline supplier communications, and the use of stronger escalation language where suppliers fail to engage. This approach prioritises remediation and alignment with the UN Guiding Principles on Business and Human Rights, with contract termination considered only as a last resort.
Risk Assessment and Management	
Strengthen our approach to assess supplier risk through the CAP Working Group. This includes identifying ways to improve suppliers' ability to successfully complete ESG risk assessments and continually improve our own processes to assess modern slavery risks in our supply chain.	Building on 2024 foundations, we have updated our Request for Proposal and contractual documentation to require suppliers to engage in a corrective action plan where ESG information or performance is insufficient. In this period, we engaged the top 100 suppliers considered highest ESG risk by spend through email outreach, 1-2-1s and webinars. We have continued to support suppliers complete ESG assessments by providing EBF training on best practice for evidence collection.

Deepen visibility across our supply chain, extending beyond tier 1 suppliers and enhancing traceability from raw material extraction to finished products.	Building on progress made in 2024, we have continued using a third-party onboarding portal and AI-supported reviews to improve baseline data on supplier operations, locations, and ESG practices beyond tier 1. Targeted one-to-one engagement with SMEs, expanded disclosure requirements for hardware suppliers and collaboration with the RBA on facility assessments have further increased traceability from raw material extraction to finished products. We also continue to leverage our critical minerals mapping tool to guide our modern slavery approach and engagement beyond tier 1 suppliers.
Strengthen internal processes and data collection to more effectively measure, assess and report on the impact of our modern slavery efforts.	This year, CGI IT UK Ltd strengthened supply chain visibility by requiring suppliers to disclose the manufacturers used for hardware goods. CGI IT UK Ltd enhanced our outreach and onboarding processes to engage these entities through the RBA framework, which enabled access to facility-level audit data and risk scores, improving visibility of the factories where goods are manufactured and supporting more targeted due-diligence and risk management activities.
Training and Capacity Building	
Expand our engagement with suppliers, including SMEs, through the CAP Working Group and EBF. Building on this year's programme of engagement, we will continue to organise events and trainings that respond to their needs to help them build capacity to manage modern slavery risks.	Our engagement with suppliers through the EBF has continued in 2025. Through a combination of in-person roundtables and online webinars, we have shared practical guidance and case studies to strengthen awareness of modern slavery, legislation and third-party accreditation processes, in line with the UK Modern Slavery Act and Home Office Transparency in Supply Chain (TISC) guidance. EBF roundtables, attended by suppliers and CGI IT UK Ltd teams have also been specifically used to discuss risks associated with working conditions. The attendance and feedback on these topics are tracked to inform future sessions.

Collaboration and Partnerships

Continue to foster greater industry collaboration by innovating new technologies to pioneer novel methods to tackle modern slavery, including further development of our critical minerals mapping tool.	We have sought expert guidance and input to develop the critical minerals map, engaging our suppliers for feedback in the process. This year we have expanded the critical minerals map to include nature-based risk layers with likely social outcomes. A particular emphasis was put on identifying how these pressures may increase exposure of vulnerable groups to modern slavery, including children, migrants and women.
Develop a framework to underpin our efforts to build trust and promote collective responsibility between CGI IT UK Ltd and stakeholders, including our Partners and suppliers. As part of our journey towards the Gold Social Value Quality Mark, the framework will strengthen a culture of respect for human rights and build capacity of stakeholders that will collectively improve our supply chain approach to modern slavery. We commit to finalising the collaborative trust framework by the end of 2025	In 2024, we were pleased to achieve the Silver Social Value Quality Mark and advanced several initiatives to strengthen our supply chain approach to modern slavery. This year we have successfully obtained the ISO standard on trust and collaborative work (ISO 44001). These accomplishments directly support the development of our collaborative trust framework and advance our efforts to promote responsible and transparency practices with our Partners and suppliers. We have continued the development of a responsible supply chain and our collaborative trust framework that codifies these principles. The framework remains on track for completion for the end of 2025 and will underpin our approach to supplier engagement in line with the Gold Social Value Quality Mark.

Future plans and continuous improvement

CGI IT UK Ltd is committed to continuous improvement to better identify and manage modern slavery risks. Priorities for the years ahead include to:

Risk Management

- Increase supplier participation in effective corrective action plans with clear timelines and collaborative actions, continuing to strengthen tracking via the CAP working group

- Deepen supply chain mapping and traceability beyond Tier 1, building stronger visibility of manufacturers and upstream risks, including labour supply chains, to enable earlier, more targeted intervention

- Broaden the use of RBA and Responsible Minerals Initiative tools, building on the FY25 programme to drive further maturity and improve data collection across the supply chain

- Annually review our modern slavery risk management processes to ensure they remain effective and aligned with our commitment to improving internal governance processes

- Incorporate geopolitical risk into annual modern slavery risk assessments, recognising that conflict affected regions may present heightened modern slavery risks

Measuring effectiveness

- Continue to refine and improve data collection processes and reporting for supplier engagement and remediation

- Continuing the identification and development of outcome based KPIs, planned improvements for 2026 include tracking training effectiveness and embedding supplier feedback surveys on understanding of emerging legislation

Building on this success, CGI UK IT Ltd continues to progress towards the Gold Social Value Quality Mark, further embedding the principle of trust that underpins this next level of accreditation.

This statement is signed and approved on behalf of the CGI IT UK Ltd Board of Directors.

Tara McGeehan

UK President and Director of CGI IT UK Limited
02 January 2026

About CGI

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Founded in 1976, CGI is among the largest IT and business consulting services firms in the world.

We are insights-driven and outcomes-focused to help accelerate returns on your investments. Across hundreds of locations worldwide, we provide comprehensive, scalable and sustainable IT and business consulting services that are informed globally and delivered locally.

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