

# Transparency Act statement 2025

CGI Norge AS

June 2026

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# 1 About CGI

Founded in 1976, CGI is one of the world's largest independent IT and business consulting services firms. Today, CGI has approximately 94,000 consultants and professionals operating across 40 countries and around 400 locations worldwide. CGI provides end-to-end services to more than 5,500 clients globally, combining business and strategic IT consulting, systems integration, managed services and intellectual property solutions.

CGI's operating model combines local client proximity with global capabilities. Through its global delivery network, industry expertise and established governance framework, CGI supports clients in modernising operations, accelerating digital transformation and improving business performance. CGI's global operating model is supported by its Management Foundation, CGI's overarching framework of policies and processes for governance, delivery, risk management and supplier relationships.

CGI Norge AS is the Norwegian subsidiary of CGI Inc. CGI Norge has approximately 400 CGI Partners and operates from several locations across Norway. The company primarily serves clients in the Norwegian market and provides services across a broad IT spectrum, including business and strategic IT consulting, systems integration, application services, managed services and industry-specific solutions. CGI Norge serves clients across both the public and private sectors, including energy, utilities, public sector, manufacturing, retail and defence.

CGI Norge combines local market knowledge with access to CGI's global expertise, delivery capabilities and governance processes. This enables CGI Norge to support clients through the full lifecycle of business and technology transformation while drawing on CGI's global capabilities where relevant.

At CGI, employees are referred to as Partners. This reflects CGI's ownership culture and long-standing belief that business success is created through shared responsibility, accountability and long-term commitment. A significant proportion of CGI employees are also shareholders, reinforcing the company's focus on accountability, quality and long-term value creation.

As a professional services organisation, CGI Norge's workforce mainly consists of skilled employees working in consulting, technology and business support roles. Employment is governed by Norwegian labour legislation, internal policies and CGI's global governance framework.

## 2 About this statement

This statement constitutes CGI Norge AS' account under the Norwegian Transparency Act for FY2025, covering the period 1 October 2024 to 30 September 2025.

In line with the Transparency Act, CGI Norge carried out risk-based due diligence assessments during the reporting period to identify, assess and follow up actual and potential adverse impacts on fundamental human rights and decent working conditions in its own operations and supply chain.

The statement sets out the main risk areas reviewed, the due diligence activities carried out during the year and the results of that work. It also explains the way in which CGI Norge uses supplier information, targeted follow-up and relevant stakeholder input as part of its annual assessment process.

# 3 Governance and policies

CGI Norge's approach to responsible business conduct is supported by established governance processes, policies and supplier management mechanisms. These provide the framework for how CGI Norge conducts business, manages supplier relationships and handles concerns through established reporting channels.

## 3.1 Responsible business conduct

CGI's commitment to responsible business conduct is anchored in the [Code of Ethics](#) and supported by the Management Foundation, CGI's overarching framework of policies and processes for governance, delivery, risk management and supplier relationships.

The Code of Ethics sets out the principles expected of all CGI Partners and reflects CGI's commitment to integrity, respect, accountability and compliance with applicable laws and regulations. All CGI Partners are required to acknowledge the Code of Ethics when joining CGI and annually thereafter.

Respect for human rights and decent working conditions forms part of CGI's wider approach to responsible business conduct. CGI also supports internationally recognised principles relating to human rights, labour, environment and anti-corruption through its participation in the United Nations Global Compact. Further information on CGI's ESG commitments, performance and progress is available in our annual [ESG Report](#).

Within CGI Norge, the Board of Directors has overall responsibility for ensuring that the company operates in accordance with applicable legal and regulatory requirements. Day-to-day responsibility is delegated to the Operations Lead of CGI Norge and supported by relevant corporate and business functions, including Procurement, ESG, Finance, IS/IT and Corporate Legal Services.

## 3.2 Working with third parties

Recognising that the greatest potential for adverse impacts on fundamental human rights and decent working conditions is likely to arise within supply chains rather than within CGI Norge's own workforce, supplier governance forms an important part of CGI Norge's approach to responsible business conduct.

CGI Norge uses established CGI procurement and supplier management processes to support the selection, onboarding and ongoing monitoring of third-party suppliers. These processes are designed to help identify, assess and manage supplier-related risks, including risks relating to human rights, labour standards, ethics and responsible business conduct.

CGI expects suppliers and other third parties to comply with CGI's Third-Party Code of Ethics. The Third-Party Code of Ethics sets out CGI's expectations regarding ethical business conduct, compliance with applicable laws, labour standards, human rights, health and safety, and responsible supply chain practices.

As part of supplier onboarding and management, CGI may use a range of due diligence and assessment mechanisms, including supplier assessments, Procurement reviews, ESG-related assessments and other available supplier information. These processes are intended to support informed decision-making and appropriate follow-up where potential risks are identified.

Further information on CGI's expectations of suppliers is available through the CGI [Third-Party Code of Ethics](#).

### 3.3 Reporting channels

CGI encourages Partners, suppliers, clients and other stakeholders to raise concerns where they believe there may be an actual or potential breach of applicable laws, ethical standards or company policies. The ability to identify and address concerns at an early stage forms an important part of CGI's approach to responsible business conduct.

CGI maintains established reporting channels through which concerns can be raised. Reports may be submitted through CGI's ethics reporting channels, including CGI's whistleblower hotline, which is available to employees, suppliers, clients and members of the public. Concerns may also be raised through management, HR, Legal, Procurement or other relevant functions, depending on the nature of the issue. Within CGI Norge, employees may also report issues and deviations through the internal portal for Health, Security and Environment (HSE). Reports submitted through these channels are handled confidentially and in accordance with CGI's internal processes.

Where CGI identifies that it has caused or contributed to actual adverse impacts on fundamental human rights or decent working conditions, CGI will assess appropriate measures to cease, prevent or mitigate those impacts and will provide for, or cooperate in, remediation where appropriate.

## 4 Risk assessment and due diligence

During FY2025, CGI Norge focused its due diligence work on areas where the risk of adverse impacts on fundamental human rights and decent working conditions may be higher, with particular attention to selected suppliers based on supplier profile, geography and relevant assessment information.

### 4.1 Main risk areas

CGI Norge considers the risk of adverse impacts on fundamental human rights and decent working conditions in its own workforce to be low. CGI Norge's workforce mainly consists of skilled employees working in professional services roles, and employment is governed by Norwegian labour law, CGI policies and internal HR processes.

The main risk of adverse impacts is considered to lie in parts of the supply chain. CGI Norge's supplier base includes both local and global suppliers, including suppliers supporting IT hardware, software, telecommunications, professional services, facilities and other business operations.

Based on the nature of CGI Norge's business and supplier landscape, the following areas are considered most relevant from a due diligence perspective:

- technology hardware supply chains, where production may involve multiple tiers and higher inherent labour risk
- suppliers outside the EEA or in higher-risk geographies
- selected service, staffing and subcontractor-type suppliers where labour-related risk factors may be more relevant
- suppliers where available assessment information is missing, unclear or indicates a need for further validation

These areas formed the basis for CGI Norge's risk-based due diligence work during FY2025.

## 4.2 FY2025 due diligence activities

CGI Norge's due diligence work under the Transparency Act is integrated into CGI's broader governance, procurement and supplier management processes. During FY2025, CGI Norge carried out a risk-based review of its supplier base to identify, assess and follow up actual and potential adverse impacts on fundamental human rights and decent working conditions.

In the previous reporting period, CGI Norge's due diligence assessment focused primarily on hardware suppliers and suppliers outside the EEA. While these areas remained relevant in FY2025, this year's assessment applied a broader risk-based review of suppliers used by the Norway Business Unit. The assessment took into account supplier profile, geography, service category, business relationship, ESG risk indicators, Third Party Security Assessment information and other supplier assessment data.

As part of the FY2025 assessment, CGI Norge reviewed supplier lists and supplier information across different categories and geographies. Closer follow-up was prioritised based on relevant risk factors, including supplier location, service category, business relationship, assessment results, ownership structure and whether supplier information required further validation.

Hardware suppliers remained an area of focus. CGI Norge reviewed the IT hardware supplier landscape and confirmed, through input from IS/IT, that the relevant hardware supplier base remains materially unchanged compared with the previous reporting period. These suppliers are established within CGI Norge's supplier landscape and remain subject to CGI's ordinary supplier governance, procurement processes and risk-based monitoring.

For selected suppliers, CGI Norge assessed additional information to better understand supplier-related risk and governance context. This included ESG risk indicators, Third Party Security Assessment information, ownership structure, agreement status, transaction history, open purchase orders, supplier usage and known issues.

The review was supported by relevant CGI functions and business stakeholders. Procurement provided supplier assessment information and available risk indicators, including information from CGI's supplier assessment processes and ESG risk tools. Legal supported the assessment of whether supplier-related matters required further follow-up or external disclosure. Finance, IS/IT and relevant business owners contributed information on supplier usage, agreement status, transaction history, open purchase orders and known supplier-related issues.

Where additional clarification was needed, CGI Norge carried out targeted follow-up through relevant CGI stakeholders with supplier contact or ownership of the supplier relationship. This included clarifying whether suppliers remained in use, what they were used for, whether there were known issues and whether any further action was required. Supplier-specific assessments and follow-up are retained as documentation of CGI Norge's due diligence work.

EcoVadis remains part of CGI's supplier due diligence process for significant and higher-risk suppliers. EcoVadis assessments may provide information on areas such as labour and human rights, ethics, environment and sustainable procurement, and are used together with other supplier information as part of CGI's broader supplier monitoring process.

CGI Norge also responded to customer enquiries relating to the Transparency Act during the reporting period. These enquiries were handled using established information on CGI's policies, supplier expectations, governance processes and previously published Transparency Act statements. This external dialogue helped ensure consistency between CGI Norge's due diligence work, external communications and information provided to customers.

The FY2025 assessment did not identify any actual adverse impacts requiring separate disclosure in this statement.

### 4.3 ESG Overall Risk Level

The FY2025 ESG Overall Risk Level overview for suppliers used by the Norway Business Unit provides an additional perspective on the supplier landscape and supports CGI Norge’s due diligence work.

The overview indicates a generally lower-risk profile for suppliers used by the Norway Business Unit than for the global supplier base, with a higher share of suppliers in the lower risk categories and fewer suppliers in the higher risk categories.

The overview is one of the inputs used when assessing supplier-related risk, alongside supplier profile, geography, available assessment information and Procurement input.

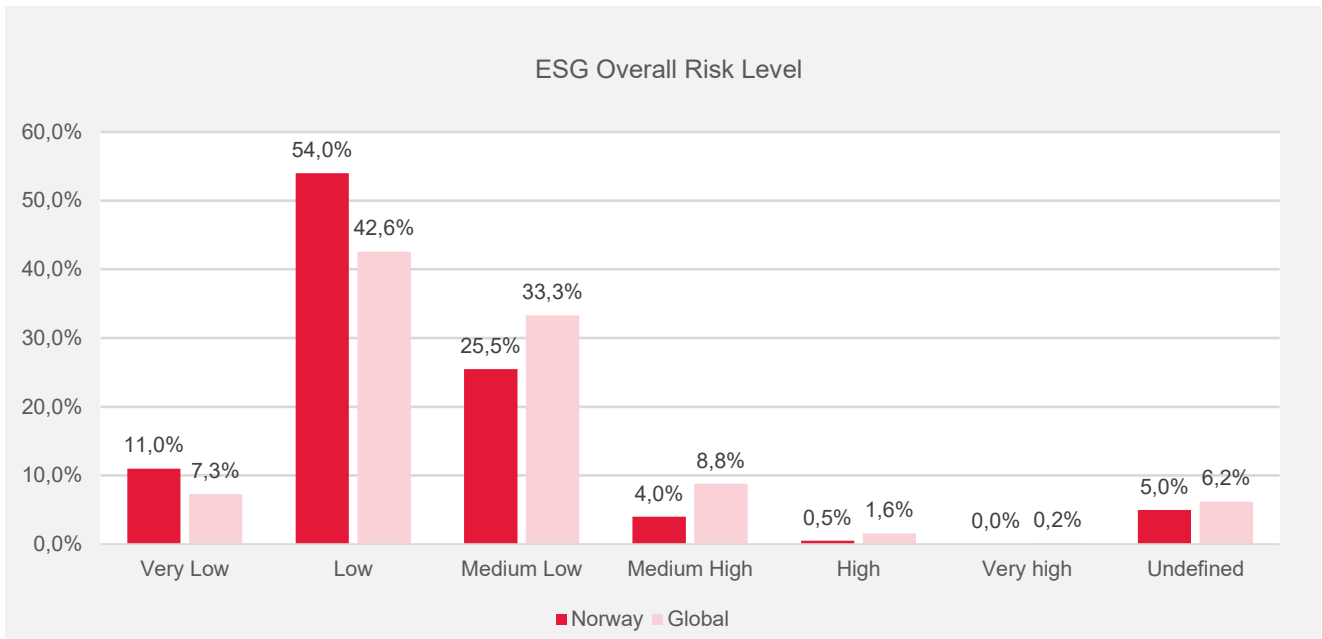


Figure 1: ESG Overall Risk Level for suppliers used by the Norway Business Unit (Source: IQ+, as of 2 June 2026).

# 5 Results

The FY2025 assessment provides the basis for CGI Norge's conclusions under the Transparency Act for the reporting period. The results also inform CGI Norge's continued due diligence work.

## 5.1 Assessment outcome

The FY2025 due diligence assessment confirmed that CGI Norge's most relevant risk areas remain within parts of the supply chain, particularly technology hardware supply chains and selected supplier categories where labour-related risk factors may be more relevant.

The assessment did not identify any actual adverse impacts on fundamental human rights or decent working conditions requiring separate disclosure in this statement. No findings were identified during the reporting period.

The work carried out during FY2025 also confirmed that CGI Norge's current approach remains appropriate for the nature of its operations and supplier base. It provides a practical basis for identifying and reviewing supplier relationships where closer assessment may be relevant.

## 5.2 Continued actions

CGI Norge will continue to apply a proportionate approach to due diligence under the Transparency Act, using existing governance processes, supplier assessment information and Procurement input to support future assessments.

The focus will remain on supplier-related areas where the potential for adverse impacts may be more relevant. CGI Norge will continue to carry out targeted follow-up where new information, changes in supplier profile or other relevant factors indicate that further assessment may be appropriate.

CGI Norge will also continue to respond to customer enquiries relating to the Transparency Act and use relevant stakeholder input to support consistency in future assessments and external communication.

Future assessments will continue to reflect CGI Norge's supplier landscape, available risk information and the results of previous due diligence work.

# 6 Approval

This statement has been approved and signed by the Board of Directors of CGI Norge AS and the Managing Director.

The statement is published on CGI Norge's website in accordance with the Transparency Act.

19 June 2026

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