

Modern slavery violates human rights and destroys communities.



Modern slavery violates human rights and destroys communities. Modern slavery takes various forms such as compulsory and forced labour, servitude and human trafficking. CGI is committed to acting in an ethical and transparent way and fully supports objectives to eradicate modern slavery and human trafficking in its business operations and in its supply chains in accordance with the UK Modern Slavery Act, 2015. CGI expects the same high standards of its suppliers, contractors, subcontractors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and other parties with whom we do business as part of our supply chain ecosystem (“business partners”).

This policy applies to all persons working for CGI or on its behalf in any capacity at all levels: board directors, officers, executive management, Members and business partners. All CGI Members (employees) and business partners should read, understand, and follow this policy, and take note of CGI’s annual Modern Slavery Act 2015 statement published on the CGI UK website homepage which provides an annual update outlining CGI’s activities to combat slavery.

This policy does not form part of any Member’s contract of employment. The policy may be amended at any time.

Responsibility for the policy

The CGI IT UK board of directors has overall responsibility for ensuring this policy complies with the company’s legal and ethical obligations, and that all those under the company’s control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given regular training on it, and also in regards to modern slavery in supply chains.

CGI Members

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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All CGI Members are required to sign up to CGI's Code of Ethics, in the form of the "Member Commitment" in which (among other aspects relating to business conduct and governance) staff members agree to treat all persons with respect and integrity. CGI operates an ethics (whistle-blower) hotline which is available to all employees, suppliers, clients and members of the public through which they can report any concerns or suspicions of modern slavery within CGI's operations or those of its suppliers.

Supply Chain Management

In accordance with section 54 of the Modern Slavery Act, as part of its due diligence and contracting processes, CGI requires its business partners to meet high standards regarding human rights, the environment and employment issues and as such responsible supply chain management is a key part of our supplier process. CGI expects its business partners to adopt similar approaches in their own supply chains. CGI's Third-Party Code of Ethics ("Third Party Code") incorporates CGI's best practices and expectations on supplier conduct to ensure that our business partners are aligned with CGI's vision and goals. It contains requirements with regard to minimum wage, safe working conditions and internationally recognised labour standards including forced labour.

All CGI business partners are required to sign up to the Third-Party Code and CGI Members are required to ensure this is done prior to or at the same time that a purchase order is placed with each business partner.

CGI standard procurement terms require suppliers to warrant they shall comply with CGI's Third-Party Code of Ethics and that neither the supplier nor any of its employees nor those third-party representatives will contravene CGI's Third Party Code of Ethics. In addition, CGI's standard terms and conditions of purchase also make specific reference to human trafficking and anti-slavery laws and suppliers are required not to engage in any activity which would breach laws and to notify CGI as soon as the supplier becomes aware of a breach or potential breach.

In accordance with best practice including the OECD guidance for multinationals, CGI via our procurement team, undertakes a thorough risk assessment to identify potential risks in our supply chain. CGI suppliers identified as high risk during due diligence are required to undertake to an additional sustainability assessment via a third-party assessment tool. Where appropriate, we will work with any impacted stakeholders to devise actions to respond to identified risks and if

appropriate where not resolved, cease activities in line with legislation and best practice as detailed in our Incident response plan.

Communications and Training

CGI has communicated regularly to Members about the Modern Slavery Act, including definitions of slavery and human trafficking via our newsletter and intranet to increase the awareness of modern slavery in the UK and to promote the processes should a case of slavery be suspected.

Recognising the risk that also exists in our supply chain, we are also working with our suppliers and providing information to support communications with their own employees regarding spotting and reporting the signs of slavery in their own organisations.

Recruitment

The charging of recruitment fees to work is a common factor underpinning many aspects of modern slavery, CGI explicitly forbids the payment of worker-paid recruitment fees both directly for its own employees and for that in its suppliers and partners. CGI does not confiscate workers original identification documents and prohibits the practice in our suppliers and this is reflected in all contractual agreements with such third parties.

Spotting the signs of slavery

Produced by Gangmasters and Labour Abuse Authority, an awareness video and related training materials containing information of how to spot and report slavery has been shared with UK CGI members. Further training may be made available from time to time, and when informed of the availability and/or requested to do so, all Members and business partners shall undertake such training. Spotting the signs of Slavery.

Someone in slavery might:

- appear to be under the control of someone else and reluctant to interact with others
- not have personal identification on them
- have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work
- not be able to move around freely
- be reluctant to talk to strangers or the authorities
- appear frightened, withdrawn, or show signs of physical or psychological abuse
- dropped off and collected for work always in the same way, especially at unusual times, i.e., very early or late at night.

Reporting and remedy for victims

Members and business partners are required to raise concerns about any issue or suspicion of modern slavery in CGI's business or operations or in any of CGI's supply chains (at any level or tier) as soon as possible. If a case of modern slavery is identified or suspected either at CGI or with its supply chain and life or health is not in immediate danger, it can be reported via the Ganglands and Labour Abuse Authority in the following ways:

- Website: gla.gov.uk
- Telephone: 0800 432 0804 (Confidential Hotline)
- E mail: intelligence@gla.gov.uk
- If potential victims are in immediate danger the standard 999 emergency number should be used.
- Non-emergency police number 101 to be used if victims are not in immediate danger

In all cases, incidents (including any conflicts or suspected conflicts with this policy) should also be reported as soon as possible to the CGI member responsible for tackling Modern Slavery, David Hodges, for action, recording and reporting to the UK senior team. David can be contacted at by telephone: +44 (0)845 0707765 or by email at enquiry.uk@cgi.com

In addition, if the victim/s are outside of the UK and no authorities are available or there are suspicions of a slavery incident in the UK, the CGI ethics / whistle-blower hotline can be used. If you are unclear whether particular treatment (whether a one-off or repeated act or omission) within CGI's operations or those of any supplier within CGI's supply chains constitutes modern slavery, please raise this as soon as possible through the ethics (whistle-blower) hotline.

Remedial Action

We will take immediate, decisive action on any evidence which indicates modern slavery is taking place in our operations or supply chain.

CGI will fully investigate any evidence of modern slavery and promptly report those details to clients where CGI has agreed to do so, confirming the facts and being transparent and accountable in our reporting progress. To support this, CGI has developed a remedial process for responding to any cases or suspected cases of any form modern slavery in our operations or supply chain. Subject to the individual's consent, where appropriate, CGI will also ensure any victims receive the appropriate from any Government-funded scheme and/or CGI support provided on a case-by-case basis.

Disclosure Protection

CGI aims to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken. CGI is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that an actual or potential act of modern slavery in CGI's business or at any level in its supply chains is, or may be, occurring or about to occur, has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your manager or immediately contact David Hodges, who responsible for CGI's response to Modern Slavery. If the matter is not remedied, and you are a CGI Member (employee), you should raise it formally through CGI UK's Grievance Policy which can be found on the intranet.

Compliance

Any Member who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. CGI may terminate the relationship with business partners, other individuals and organisations working on CGI's behalf if they breach this policy.