



# Modern Slavery Act transparency in supply chains

Statement for financial year ending  
30 september 2024



## CGI IT UK Limited

This year, at a global level, CGI Inc. achieved a 'Gold' rating from EcoVadis for its 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 pleased to see strong progress in the Sustainable Procurement category with an overall score of 90/100, reflecting our focus this past year on supplier engagement and capacity building, particularly in the UK.

We are also pleased to announce that CGI IT UK Limited (CGI IT UK Ltd) achieved a Silver Social Value Quality Mark, improving on last year's Bronze accreditation. 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 this milestone reflects our commitment to deliver meaningful impact, including our commitment to fair treatment of staff and our ethical decision-making and responsible supply chain practices.

## About us

Founded in 1976, CGI Inc. is among the largest independent IT and business consulting services organisations in the world. CGI IT UK Limited (CGI IT UK Ltd) is part of the CGI group of companies. CGI Inc. has over 90,500 consultants and other professionals across the globe, whom we call 'CGI Partners' as a vast majority are also company shareholders. We are a major employer working in offices across the UK with around 6,200 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 FTSE4Good.

## About our ninth 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 ninth Modern Slavery and Human Trafficking Statement, for the 2024 financial year (1 October 2023-30 September 2024).

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.

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.

However, we know that modern slavery exists in many different sectors across the world, including here in the UK and in the products and services we procure. We also recognise that companies can be unaware of modern slavery in their supply chain and a robust approach is required in operations and throughout the supply chain.

Most of the suppliers used to procure products and services for CGI IT UK Ltd and our clients are UK-based organisations, which account for 94.3% of supplier spend. 2.5% of spend is associated with suppliers based in the European Union, 1.99% in North America and 1.21% of suppliers (less than £3,000,000) based in other countries. The top five categories of CGI IT UK Ltd procurement spend include Infrastructure (19.8%), Professional Services (19.1%), IT Products and Maintenance (18.8%), Telecom (11.6%) and Temporary or project-based labour (10.9%).

### Progress this year

We are committed to strengthening our approach to tackling modern slavery within our operations and supply chain on a continuous basis. This year, key areas of progress include:

- Strengthening our supplier risk assessment processes with robust and updated criteria to determine further due diligence steps required. This enables us to hold our suppliers to higher standards and ensure we provide targeted capacity building.
- Advancing our risk management strategy through robust governance processes, including the strengthened remit of the Corrective Action Plan Working Group. Through the Working Group, higher-risk suppliers are being pro-actively engaged through targeted one-to-one meetings and training events led by our newly appointed supply chain engagement lead.
- Rolling out innovative tools to strengthen our modern slavery due diligence of high-risk suppliers. This includes the development of our geospatial critical minerals map to better understand modern slavery risks associated with critical minerals deeper in the supply chain. We also successfully implemented an AI-based screening tool to support resource constrained small and medium enterprises (SMEs).
- Fostering greater industry collaboration through our Ethical Business Forum, bringing together pioneers of best practice such as the Responsible Business Alliance (RBA), the UN Global Compact (UNGC), the Centre for Child Rights and Business, as well as suppliers and CGI Partners to learn, share ideas and collaborate to collectively overcome challenges in the industry.
- Achieving the Silver Social Value Quality Mark, evidencing our commitment to creating positive social outcomes in our operations, supply chains and environment.
- Scoring 96% on the UK Government's Modern Slavery Assessment Tool (MSAT), highlighting improvements made in our modern slavery approach, notably in due diligence.

## Our Policies and management systems to address modern slavery

CGI IT UK Ltd has invested in developing a strong corporate culture that reflects its 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.

## 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 outlines 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 its 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 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 commitment, 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 IT UK Ltd Procurement Policy is designed to support compliance with CGI IT UK Ltd's 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 IT UK Ltd 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 IT UK Ltd, 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 IT UK Ltd'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 IT UK Ltd's Third-Party Code of Ethics is embedded within CGI IT UK Ltd's 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 2023, we established a guide consolidating all ESG standard clauses included in third-party contracts. This helps to increase understanding among CGI Partners and suppliers of the ESG standards we require compliance with, including on modern slavery.

To strengthen CGI IT UK Ltd's requirements during the tender process, we have updated our approach to Requests for Proposals (RfPs). RfPs are assessed on a case-by-case basis depending on the type of work being contracted. In addition to the standard template which considers the structure of employment and manufacturing and extracting processes of suppliers, RfPs in higher-risk categories of procurement include additional modern slavery questions based on guidance set by the RBA. Since implementing this approach, multiple suppliers have been engaged on ESG practices in contractual conversations, increasing our understanding of the ESG maturity of new suppliers.

These resources help underpin supplier engagement and our approach to upskilling suppliers on modern slavery, particularly within Corrective Action Plan conversations. These conversations discuss areas identified for improvement following third-party ESG assessments and facilitate discussion as to how CGI IT UK Ltd can best support suppliers to effectively manage the risks of modern slavery.

## Grievance mechanisms and remedy for victims

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. 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.

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.

We commit to undertake regular reviews of our processes to increase the effectiveness of our approach to tackling modern slavery.

## Governance

CGI IT UK Ltd's executive management team is fully supportive of taking steps to mitigate the risk of modern slavery in CGI's operations and our supply chain. The CGI IT UK Ltd board of directors has overall responsibility for ensuring that our modern slavery policy and statement comply with the company's legal and ethical obligations and that all those that work for the company comply with it. The UK board has appointed Mattie Yeta, Chief Sustainability Officer UK, and David Hodges, Head of Operations UK and Australia and member of CGI IT UK Ltd's executive management team, to lead CGI IT UK Ltd's response to modern slavery.

Management at all levels is responsible for ensuring those reporting to them understand and comply with the company's modern slavery policy.

Day to day management of the company's approach to modern slavery is delegated to our Social Sustainability Working Group. Building on last year's appointment of a Head of Governance within our sustainability team, we have further expanded our capacity with new hires dedicated to sustainability-focused supply chain engagement. This includes a newly appointed Social Sustainability Consultant who is responsible for engaging suppliers, enhancing collaboration and helping them overcome challenges to drive progress across modern slavery and other sustainability topics. Our cross-functional Social Sustainability Working Group ensures a co-ordinated approach to address modern slavery and oversees and discusses development in ESG-related policies with senior stakeholders, including on tackling modern slavery and driving better outcomes in our supply chain.

We have strengthened our governance processes around supply chain risk by establishing a Corrective Action Plan Working Group which is concentrated on the pro-active identification and management of modern slavery risks. The Working Group is composed of senior leadership including the Chief Sustainability Officer, Vice President for Procurement and the Vice President Head of Operations, members of the Social Sustainability Working Group and the Legal team. This year, the Corrective Action Plan Working Group's strategy prioritised pro-active engagement with our top 100 high risk suppliers by spend, and the group meets regularly for ongoing monitoring and evaluation of engagement strategies and performance. As a result of the Working Group's activity, CGI Partners initiated one-to-one meetings with suppliers to gain a deeper understanding of the potential modern slavery risks they could face. CGI Partners also actively collaborate with suppliers to enhance their capacity and strengthen their risk management processes. As these meetings progress, we will expand our engagement beyond the top 100 suppliers.

These initiatives are part of a broader effort to incorporate environmental, social and governance risks into our Enterprise Risk Management system, to ensure that significant risks, including those associated with modern slavery, are appropriately escalated at enterprise level.

CGI IT UK Ltd also receives support from external human rights specialists.

## Due diligence processes: Assessing and managing risks in our business operations and supply chain

We have assessed the areas where the likelihood of modern slavery risks is highest, and this guides the actions we are implementing to effectively manage these risks.

Risk area	Risk analysis	Mitigating actions
<b>Own operations</b>	<ul style="list-style-type: none"> <li>As a services organisation where the vast majority of CGI Partners are highly skilled and are recruited and contracted directly by CGI IT UK Ltd, we consider the risk of modern slavery within our workforce to be very low.</li> <li>Within our direct workforce, lower paid and lower skilled roles such as reception and security present a higher level of risk.</li> </ul>	<ul style="list-style-type: none"> <li>We have in-sourced higher risk services in lower paid roles in order to increase our oversight of these services and to reduce the risk of modern slavery taking place. We have rigorous recruitment practices in place and only work with our preferred list of reputable recruitment agencies who are subject to due diligence to reduce the risk of modern slavery.</li> </ul>
<b>Supply chain</b>	<ul style="list-style-type: none"> <li>A very low proportion of goods and services are procured from geographies which are considered higher risk of modern slavery.</li> <li>Our supply chain includes goods, such as electronics and hardware, which are considered higher risk for modern slavery.</li> </ul>	<ul style="list-style-type: none"> <li>Suppliers operating in high-risk geographies and/or providing high-risk goods and services, as determined by our modern slavery risk assessment tool, are required to complete further due diligence in order to identify and act on changes needed to enhance their management of human rights risks.</li> <li>We take a pro-active approach to engaging higher-risk suppliers through in-person and one-to-one meetings to build supplier capacity to manage modern slavery risks.</li> <li>We developed a global critical minerals map using environmental and social data to gain better visibility of the critical mineral supply chain beyond tier 1 suppliers and facilitate modern slavery risk mitigating actions.</li> </ul>

### Due diligence: in our own 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.

## Due diligence: in our supply chain

We are working to mitigate modern slavery risks at all stages of the procurement process and take targeted action in areas of greater risk.

### Identifying and assessing risk of new and existing suppliers

Our Third-Party Supplier Portal is used to assess supplier's exposure to, and management, of modern slavery risks to determine if further due diligence is needed. Suppliers are required to answer a questionnaire on their ESG practices via the Third-Party Supplier Portal. 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 (such as reliance upon low-skilled labour or agency workers). 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. This year, as a result of discussions facilitated by the Corrective Action Plan Working Group, we updated the questionnaire to include additional ESG assessment criteria relevant to the RBA.

Our modern slavery risk assessment tool 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 below. This year, we strengthened our risk assessment tool and expanded the geographies, products or services categorised as high-risk. By broadening our high-risk categories and adopting a more rigorous due diligence framework, we aim to increase visibility across industries where critical minerals and transient workforces with inadequate oversight are prevalent. These enhancements will allow us to deepen our understanding of risks and take proactive steps to address them effectively.

Last year, we introduced a 'high-risk watchlist' category for geographies considered medium risk. 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 saw South Africa and United Arab Emirates, both countries associated with new CGI IT UK Ltd spend, added to high-risk countries, while the USA remained on the watchlist for ongoing monitoring.

To further strengthen the assessment of modern slavery risks in our supply chains, we have 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, 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.

We continue to increase visibility of working conditions in our supply chain, including through education of the RBA Worker Voice Platform through the Ethical Business Forum. 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.

## Identifying and assessing risk in supplier selection

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.

Our modern slavery risk assessment tool is also used to identify tenders that require additional due diligence on labour and human rights. For those identified as higher risk, we require suppliers to complete a third-party ESG assessment to support our decision. We also include additional ESG assessment criteria in higher-risk tenders following guidance set by third-party partners, such as the RBA. For example, in construction tenders, suppliers were assessed via the enhanced ESG questionnaire, a third-party ESG assessment and their commitment to paying the living wage. These evaluations provided insights into their operational management and supply chain oversight of modern slavery risks. They also identified areas for improvement to strengthen their management of modern slavery risks in the coming year ahead of our annual review.

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.

## Due diligence of high-risk suppliers

CGI Inc. leverages third-party ESG assessments to conduct due diligence on high-risk suppliers. For suppliers classified as high-risk for modern slavery and significant suppliers<sup>1</sup>, we work with EcoVadis, a specialist sustainability ratings agency to conduct due diligence.

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 takes into account 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 of their approach, including disclosure outcomes, to evidence the effectiveness of their approach. For instance, the number of confirmed cases of modern slavery, key performance indicators such as the number of suppliers evaluated/audited and training results. This information is verified against external evidence, such as labour assessment reports, news articles, judicial sources, trade union data and additional information from other published sources. 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.

This year, 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. This decision was led by the Corrective Action Plan Working Group as a result of our stronger approach to modern slavery governance.

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.

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<sup>1</sup> 74 significant suppliers with which we have done the most business over the last three years.



CGI IT UK Ltd also took a significant step to strengthen our due diligence process at a global level. In-line with our robust commitment to responsible sourcing, we increased the threshold at which a supplier is rated 'insufficient' in their overall EcoVadis assessment, from 25 to 44. This removes the option for a supplier to achieve a 'partial' score, classified as 25 to 44 under the EcoVadis scoring system. The decision to increase the threshold reflects our efforts to hold our suppliers to higher sustainability standards and foster improved supplier performance. Members of the Corrective Action Plan Working Group played a significant role in engaging CGI Inc. colleagues around the world to enact this change at a global level.

As part of our strengthened due diligence approach, all suppliers with a score below 44 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 Corrective Action Plan 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.

Strengthening our approach to supplier engagement has been a key focus of the Corrective Action Plan Working Group this year. We have been engaging suppliers through various activities, including in-person one-to-one meetings, workshops and collaborative events.

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.

However, 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.

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. This year, we have placed 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 Ethical Business Forum, which includes participation in awareness-raising events, workshops, and training sessions aimed at sharing insights and practical strategies for improvement.

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 Corrective Action Plan Working Group and supplier manager to determine any mitigating actions. This year, there was one negative flag and the relevant supplier manager is engaged in ongoing discussions with the supplier, supported by our Correct Action Plan Working Group. Any new orders raised with flagged suppliers will notify the procurement team of the risks before they commit to the supplier and will enable them to make an informed decision about whether to work with that supplier.

## Targeted due diligence in the IT sector

We are continuously enhancing our due diligence of suppliers in high-risk and high-spend sectors. By leveraging our partnership of the RBA and collaborating with other partners, we aim to gain greater visibility of our IT manufacturing supply chains beyond tier 1. This enables us to mitigate the potential risk associated with conflict minerals in our supply chain.

We have identified growing concern surrounding the transition to a sustainable economy and the need for a just transition to safeguard human rights. Rapidly increasing global demand for critical minerals that are essential for green and low-carbon technologies may exacerbate poor labour standards and risks of modern slavery in the regions where these minerals are sourced. To understand data gaps and facilitate collaboration in our supply chain and the wider industry to strengthen efforts to reduce these risks, we held a roundtable on Child Labour and Critical Minerals with the UK UNGC Network, where we gathered insights directly from individuals based in the Democratic Republic of Congo. The roundtable was attended by our suppliers and partners across various industries, such as construction and technology. The event helped increase understanding of the processes that can be used to better identify risks of child labour in supply chains.

Building on our commitment to innovate and develop new technologies aimed at addressing modern slavery, we are developing a critical minerals mapping tool to improve supply chain visibility. The tool integrates socio-economic and environmental geospatial data at a global level to better understand evolving supply chain risks, specifically addressing data gaps that may indicate the prevalence of modern slavery beyond our tier 1 suppliers. In line with our dedication to leveraging technology to advance industry practices for managing modern slavery, we will continue to refine this tool. For instance, insights gathered from our roundtable discussion on Child Labour and Critical Minerals have informed the ongoing development of the tool, ensuring it meets the needs of our supply chain.

Our critical minerals map is used alongside targeted RBA tools and resources to conduct due diligence in accordance with internationally recognised frameworks such as the OECD Due Diligence Guidance for Responsible Business Conduct and the UN Guiding Principles for Business and Human Rights.

This year, we held a webinar for suppliers on managing modern slavery risks and heard from individuals at the RBA on the tools available through its Responsible Minerals Initiative (RMI) that suppliers can leverage to conduct targeted due diligence in the IT sector.

## Due diligence - in numbers

During this financial year, a total of 453 suppliers were requested to complete a third-party ESG assessment, on the basis of their modern slavery exposure or level of spend. In total, 338 suppliers completed an assessment, representing 75% of those requested.

This includes 396 suppliers considered as higher risk for modern slavery which represents an increase of 30% compared to the previous year. 73% high-risk suppliers completed an assessment, representing 89% of high-risk spend.

We recognise that a number of high-risk suppliers who do not complete third-party ESG assessments are SMEs. We understand that SMEs typically face greater resource and financial constraints in achieving ESG compliance in the assessment process. To support SME suppliers to build their capacity for ESG, we pro-actively engage them in conversations, in-person roundtables and webinars through the Ethical Business Forum to support them on the journey to third-party accreditation.

64% 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-part equivalent module) representing 85% of high-risk spend assessed. In line with our increased score threshold, we have removed the 'partial' score category (previously scoring between 45-25). The percentage of suppliers rated as insufficient in line with our updated threshold (scoring below 45) on labour and human rights was 9%. These suppliers are currently being engaged through the Ethical Business Forum to improve their scores, with progress regularly monitored by the Corrective Action Plan Working Group. No suppliers score below 25 for labour and human rights.

The Supplier Corrective Action Plan 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.

## Responsible purchasing practices

We recognise the important role of responsible purchasing practices in mitigating modern slavery risks in our supply chain. We are committed to developing long-term relationships with suppliers and in recent years have focused on consolidating our spend on IT hardware and software. Diverting spend to preferred suppliers and reducing our transactional short-term relationships enables us to establish longer-term relationships with suppliers in this high-risk category of spend. This allows CGI IT UK Ltd to deepen our understanding of how the preferred suppliers manage sustainability risk in their business and supply chain and gives us more leverage to influence the supplier to invest in activity, which mitigates risk. We are committed to paying our suppliers, in particular SMEs, on time and are signatories to the Prompt Payment Code. Under the new code, we commit to paying 95% of invoices from small businesses within 30 days.

As part of our journey to achieve the Social Value Quality Mark Silver Accreditation, external auditors sought feedback from suppliers on our performance as a buyer, focusing on communication, effectiveness, fairness and transparency. Our commitment to prompt payment practices was a key highlight in the positive feedback from suppliers.

## 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.

Our Ethical Business Forum 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. This year, as part of the initiative, we hosted an online forum focused on modern slavery due diligence within organisations and supply chains for CGI Partners and suppliers in collaboration with the RBA and the Centre for Child Rights and Business. The forum covered methods and tools to identify signs of modern slavery and processes to manage risks once identified. It also discussed the increasing risk of child labour, particularly in certain sectors, and outlined steps organisations can take to develop effective remediation plans should instances of child labour be discovered. Following the event, supplementary resources were distributed to attendees to further support their efforts.



This year, we have expanded the ways in which we engage suppliers beyond the Ethical Business Forum and provision of training resources. We engaged our suppliers through online webinars, in-person roundtables and community events such as Sustainability Careers Fest, recognising our ability to support suppliers to mature their approach to modern slavery and wider ESG issues.

As part of our efforts to foster supportive partnerships in our supply chain, this year we successfully rolled out a supplier satisfaction assessment programme. The programme establishes clear and consistent 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.

As part of our assessment for the Silver Social Value Quality Mark, auditors used findings from the programme and directly engaged several suppliers to understand how we work with them. We are pleased by the positive responses we received regarding our responsible supply chain practices. In particular, our dedication to ethical and transparent decision-making and prompt payment was a key feature of our assessment report. These insights will help shape future engagement and activities to better support our partners and suppliers.

## Training for CGI members

As outlined in our Modern Slavery Policy, 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. Any updates to policies and training resources are shared with CGI Partners through internal communications and articles. This includes through internal campaigns such as National Anti-Trafficking Day and Anti-Slavery Week. Resources are 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.

This year, we introduced a Sustainability Learning Passport for CGI Partners to provide 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. 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.

We work with external organisations such as the UNGC to raise awareness about modern slavery and what to do should a case of slavery be suspected. Building on the Ethical Business Forum organised this year, we plan to continue holding forums with other partners, such as the RBA, and build our community of practice.



## Targeted training

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 reporting year, training provided was completed by 100% of targeted audiences through the Ethical Business Forum and at the procurement council.

## 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	FY24
<b>Risk identification and assessment</b>		
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. (FY23: 67%, 94%)
<b>Risk management and capacity building</b>		
Percentage of CGI IT UK Ltd's top 100 suppliers** directly engaged on sustainability topics, including modern slavery, to upskill and build supplier capacity, through the Ethical Business Forum and one-to-one meetings.	FY25: 100%	60%
Number of collective engagement activities organised through the Ethical Business Forum for Partners and suppliers to collaboratively address aspects of modern slavery and share best practice.	FY25: 7	5
<b>Learning and Development</b>		
Percentage of CGI IT UK Ltd's targeted procurement Partners completing annual training on modern slavery through the Ethical Business Forum and other platforms***.	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:

Commitments	Progress to date
<b>Governance</b>	
<p>Continuously evaluate and identify opportunities to improve internal governance processes that effectively manage our approach to modern slavery in our business and supply chain.</p>	<p>We strengthened the role of the Corrective Action Plan 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.</p>
<b>Collaboration and partnerships</b>	
<p>Expand the capacity and reach of our critical minerals mapping tool through collaborative partnerships and the integration of advanced technologies. This will support extensive supplier mapping and engagement beyond tier 1 to better understand the modern slavery risks in our supply chain and changing landscape associated with modern slavery and critical minerals.</p>	<p>We have sought expert guidance and input to develop the map, engaging our suppliers for feedback in the process.</p> <p>The map utilises geospatial technology to overlay social and environmental data on country level risks associated with critical minerals. We look to integrate new technologies in the year ahead.</p>
<p>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.</p> <p>The framework will also enable CGI IT UK Ltd to understand current gaps in knowledge and provide targeted support to ensure Partners and suppliers are better equipped to identify and address risks related to modern slavery. In doing so, we aim to improve our ability to measure the impact of our modern slavery engagement and drive accountability towards continuous improvement.</p> <p>We commit to finalising the collaborative trust framework by the end of FY25.</p>	<p>We are pleased to have achieved the Silver Social Value Quality Mark in FY24. Building on this, we have undertaken several key initiatives to strengthen our supply chain approach to modern slavery.</p> <p>We have engaged suppliers through the supplier satisfaction assessment programme and Ethical Business Forum events to seek feedback on how we can foster and strengthen collaboration in our supply chain to support collective continuous improvement to manage the risks of modern slavery. These channels of communication have laid the foundations of our framework, fostering trust and advancing our shared commitment to ethical practices. Please see relevant sections for more information.</p> <p>The framework remains on track for finalisation by the end of FY25.</p>

## Looking ahead

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

- Continue strengthening our approach to assessing supplier risk through the Corrective Action Plan 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.
- Deepen visibility across our supply chain, extending beyond tier 1 suppliers and enhancing traceability from raw material extraction to finished products. This includes leveraging our critical minerals mapping tool to guide our modern slavery approach and engagement beyond tier 1 suppliers.
- Expand our engagement with suppliers, including SMEs, through the Corrective Action Plan Working Group and Ethical Business Forum. 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.
- Strengthen internal processes and data collection to more effectively measure, assess and report on the impact of our modern slavery efforts. This will support meaningful performance improvements while fostering better conditions for workers throughout our value chain.
- 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.

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 2025

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## About CGI

### Insights you can act on

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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