

A decorative graphic consisting of several colored circles (red, orange, yellow) connected by thin lines, resembling a network or molecular structure.

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## MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDING 2018

PUBLISHED MARCH 2019

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### **About us**

Founded in 1976, CGI is one of the largest IT and business consulting services firms in the world. Operating in hundreds of locations across the globe, CGI professionals help clients to achieve their goals, including becoming customer-centric digital organisations. We deliver an end-to-end portfolio of capabilities, from high-end IT and business consulting to systems integration, outsourcing services and intellectual property solutions that help accelerate clients' results. CGI works with clients around the world through a unique client proximity model complemented by a global delivery centre of excellence network to help clients accelerate results transform their organisations and drive competitive advantage.

Operating in the UK as CGI IT UK Ltd, we are a major employer with over 5000 employees and hundreds of suppliers. We therefore recognise that we have a responsibility to encourage and support sustainable business practices as well as facilitate inclusion and diversity amongst our suppliers.

### **About our third Modern Slavery Statement**

This is CGI's third published statement regarding our approach to modern slavery. CGI is committed to high ethical standards in all aspects of its operations. To support this, we made significant improvements in our policies and processes which were detailed in our second statement to ensure, as far as possible, that we are not directly or indirectly involved in any human rights abuses. Whilst we will continually look to refine and improve our approach, this statement reflects our established commitment to providing safe and fair working conditions for our 5000 plus employees and the way in which we work with our partners and suppliers to ensure responsible and ethical business practices.

## **Combatting slavery and human trafficking – our risks**

CGI recognises that slavery is both illegal and unacceptable. As a services organisation where most of our workers are highly skilled and directly employed by our organisation, we consider the risk of modern slavery within CGI's own organisation to be low.

However, in order to operate efficiently and provide reliable services for our clients, we work with third parties such as suppliers and contractors. We consider our biggest exposure to modern slavery to be outside our organisation in this supply chain.

We assess our highest risk suppliers to be those involved in the manufacturing of technology hardware; those based in locations assessed as high risk; and suppliers who support the maintenance of our buildings such as construction and property maintenance organisations who are likely to be an employer of lower skilled labour.

The processes detailed in this statement outline our approach to mitigating these identified risks.

## **Due diligence in Supplier Management**

During 2017, CGI globally enhanced its procurement process to gain a more thorough understanding of the sustainability credentials of our supply chain and, in doing so, mitigate the risk of our exposure to slavery. As each new supplier is added an initial review and a materiality rating checklist are completed. The rating covers the supplier's type of operation, number of employees and location of business operations: all of which are key indicators of potential risks of slavery. If any potential ethical or labour concerns are raised during this review, an additional assessment is undertaken by a third party sustainability agency. This assessment includes a detailed review of a wide range of sustainability indices, including questions regarding labour practices, locations and modern slavery. Suppliers must also provide detailed evidence of their approach to human rights and slavery in the form of policies and reports. The agency also verifies its assessments against other evidence, such as labour assessment reports, news articles and other information from externally available sources. Once obtained, the procurement team are able to make an informed decision about whether or not to proceed with adding the supplier to our approved supplier list.

As part of our diligence process for new suppliers and supply contract renewals, suppliers are requested to abide by CGI's Labour, Health and Safety and Environmental standards and CGI's Third Party Code of Ethics. Suppliers' acknowledgement of these standards is documented through their completed Supplier Business Profile. CGI's Third Party Code of Ethics reflects CGI's best practices and expectations on supplier conduct to ensure that our suppliers are aligned with our vision and goals. It contains requirements with regard to minimum wage, safe working conditions and internationally recognised labour standards, including forced labour. CGI expects its suppliers to meet high standards regarding human rights, the environment and employment issues. To that end, CGI's Third Party Code of Ethics aims to provide suppliers with the appropriate guidance to make informed business decisions while working with CGI.

In addition, CGI's UK standard terms and conditions of purchase make specific reference to human trafficking and slavery laws to remind CGI's suppliers that any subsequent subcontractor agreements should also comply with anti-human trafficking and slavery legislation.

## **Progress since our last report**

CGI IT UK Ltd. used around 1400 different suppliers during 2018 to support the delivery of services to its clients, of which the large majority are UK based. On behalf of CGI, as part of our supplier due-diligence, a specialist sustainability agency has undertaken detailed assessments to ensure all identified high-risk

suppliers comply with human rights as with other aspects of ethical business practice. In our 2017 Modern Slavery statement, we set an objective to complete all of the assessments of identified high risk suppliers in our UK supply chain by the end of our 2019 financial year and we are on track to achieve this objective. The majority of these suppliers are UK based companies from the maintenance sector who support us with maintaining our UK facilities.

In addition to pursuing any incomplete sustainability assessments with suppliers, we are also reviewing alternatives to formal assessments, particularly for smaller to medium sized enterprises (SMEs) to ensure they may still comply with our due diligence processes.

## **Recruitment and training**

We use only specified, reputable employment agencies to source our new employees and always verify the practices of any new agency we are using before accepting staff from that agency. Specific reference to the Modern Slavery Act has been included in our contractual agreements with all recruitment agencies.

CGI IT UK Ltd. is in the process of bringing a number of employees from a third party responsible for the maintenance of our facilities in-house to become permanent CGI employees. As such, these employees will be subject to thorough employment checks as part of our well-established process.

## **Engaging our members in human rights issues**

CGI employees are known as “members” to reflect that they are not only employees or workers but are also participants in the business and contribute to its success. All members are required to acknowledge that they have read and understood CGI’s Code of Ethics in the form of the “Member Commitment”, in which (among other aspects relating to business conduct and governance) members agree to treat all persons with respect and integrity.

This is supported by CGI’s ISO 9001-certified Member Partnership Management Framework (MPMF), which governs how we manage our member relationships. We build strong and long-term relationships with our members through a prescribed set of activities, including new member orientation and integration, performance and career management, member satisfaction measurement, as well as one-to-one and team meetings. This approach encourages a collective ownership approach to managing member relationships, increases member satisfaction and enhances the working environment. It also provides an opportunity to identify any potential human rights issues.

CGI communicates regularly to its members about the Modern Slavery Act, including its definitions of slavery and human trafficking via our Modern Slavery Policy, newsletters and intranet. A training video has also been made available to all CGI members and contractors to increase the awareness of modern slavery in the UK and to promote the processes should a case of slavery be suspected.

In 2017, we set a target of 80% of members to undertake the training by the end of our 2019 financial year. We are continuing to work with our members in understanding their role in combatting slavery through regular communications in our weekly UK newsletter and intranet.

## **Reporting and remedy**

If a specific case of modern slavery is identified or suspected here in the UK, we advise members to report it to the police immediately on 101. Where any potential victims are in immediate danger we advise use of the standard 999 emergency number. Managed by an independent organisation, CGI promotes an ethics (whistle-blower) hotline via its Code of Ethics Policy, which is available to all members, suppliers, clients and members of the public. This may be used to report any concerns or suspicions of human rights abuses and modern slavery within CGI’s operations or those of its suppliers.

Referral for potential adult victims is subject to the individual's consent and CGI will work with the National Referral Mechanism to support any potential victims to receive government-funded support and/or CGI support provided on a case-by-case basis.

### **Management of CGI's approach to modern slavery**

The senior management of CGI is fully supportive of taking steps to ensure that no modern slavery or trafficking occurs in CGI's operations or those of its suppliers. In the UK, CGI has appointed David Hodges, Vice President, Contracts and Commercial Management (Legal), to lead CGI IT UK Ltd.'s response to modern slavery. David will report any suspected or actual cases of slavery to the CGI IT UK Ltd. board of directors and also table an annual review of modern slavery processes and activities at a CGI IT UK Ltd board meeting.

Undertaken as a review of our last financial year, this statement is published pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes CGI IT UK Ltd.'s slavery and human trafficking statement for the 2018 financial year (from 1 October 2017- 31 September 2018).

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

A handwritten signature in black ink, appearing to read 'Tara McGeehan', written over a light grey rectangular background.

Tara McGeehan

UK President and Director of CGI IT UK Limited

19 February 2019