CGG SERVICES (UK) LIMITED
UK MODERN SLAVERY ACT
STATEMENT 2020
CGG Services (UK) Limited is a subsidiary of the French CGG SA Group (www.cgg.com), a global geoscience technology leader. Employing around 3,700 people worldwide, CGG provides a comprehensive range of data, products, services and solutions that support our clients to more efficiently and responsibly solve complex natural resource, environmental and infrastructure challenges.

Within the CGG Group of Companies, CGG Services (UK) Limited mainly conducts its business through offices spread across the UK, which provide a wide range of environmental, geological and geoscience services, alongside a multi-client library of data available for licence.

CGG Services (UK) Limited had a 2020 turnover of more than £36 million.

This statement is made on behalf of the Board of CGG Services (UK) Limited in accordance with the Modern Slavery Act 2015. It makes public the policies and processes in place within CGG Services (UK) Limited and its subsidiaries to ensure that modern slavery offences are not taking place in either their business or their supply chain.
CGG’S SUPPLY CHAINS

CGG Services (UK) Limited’s supply chain encompasses rental and maintenance of its facilities and IT equipment. Suppliers are based mainly in the UK and represent 82% of the supply chain and 85% of the 2020 spend.

In 2020, CGG Services (UK) Limited purchased 96.5% of supplied goods and services from suppliers based in countries that have signed all eight International Labour Organisation ("ILO") fundamental labour conventions, regarding forced labour, child labour, discrimination, and freedom of association.

In addition, 3.7% of the UK supply chain purchases were made through US-based suppliers (equating to 2.0% of the total 2020 spend). Although the US has not signed all eight ILO conventions, as a member it respects the principles concerning the fundamental rights which are the subject of these conventions.

CGG POLICIES ON MODERN SLAVERY

To manage the risk of modern slavery and human trafficking in its supply chain, CGG Services (UK) Limited follows the CGG Group policies and management systems, which function in line with the Modern Slavery Act requirements. The CGG Business Code of Conduct, available in ten languages, sets out the rules and expected behaviour to enable the Group to conduct its business with integrity. All employees must adhere to its principles and requirements. In this code, CGG commits to respect ILO’s Declaration on Fundamental Principles and Rights at Work, including two ILO fundamental conventions on elimination of all forms of forced and compulsory Labour. CGG expects all its subcontractors and suppliers to respect the same principles. During 2020, the Business Code of Conduct was promoted using a variety of communication channels, including: Company Newsflashes, Town hall meetings, company Intranet, internal Newsletters and UK-wide endorsement emails from senior Management being cascaded. Furthermore, the Group’s HSE Policy stipulates that CGG, as a member of the United Nations Global Compact (UNGC) since 2007, recognizes all underlying international ILO conventions and laws, and complies with all applicable national and industry regulations.

The ‘Caring for Human Rights and Communities’ document is available to all employees. It reaffirms CGG’s top-management commitment to respect and promote human rights, and details rules and recommendations related to the eight fundamental international ILO conventions, including the C029 convention on forced labour. It also clearly states that the minimum age to work for CGG or for one of its service providers is 16 or more, subject to locally applicable legislation defining minimum age. Young workers aged 16-18 working directly or subcontracted are an exception within the CGG Group (i.e. in apprenticeship roles across our UK operations). These workers benefit from additional supervision and specific precautionary measures aimed at protecting their health, safety, and integrity. Such measures include advanced job induction and training, prohibiting all exposure to hazardous work, ensuring adequate planning of activities undertaken and taking appropriate rest. During 2020, this group represented 0% of the CGG UK employee population.

The Group-level CGG Ethics Committee endorses and communicates the Business Code of Conduct, ensuring that our standards are widely distributed and that all CGG employees are properly trained in this topic. Employees and third parties can contact the Ethics Committee at any time (directly or anonymously) via the EthicsPoint Hotline, hosted by NAVEX Global, an independent third party, to report concerns or alleged violations in relation to our Business Code of Conduct. During 2020 UK employees were regularly reminded of the ways to contact our Ethics Committee via a variety of communication channels including; company intranet, internal Newsletters and UK-wide emails. As part of the initiative to identify risks inherent and relevant to its activities, CGG conducts a Sustainability Materiality analysis every three years. The results from the most recent analysis and resulting key focus areas can be found at CGG.com.

Regarding CGG Services (UK) Limited activities, the risk of modern slavery or human trafficking within our supply chains and UK operations is considered as very low.

CGG SUPPLIERS’ ADHERENCE TO OUR VALUES

As stated in the Business Code of Conduct, CGG is committed to managing suppliers and subcontractors to ensure their respect of human rights. The Purchasing department has a CGG Supplier Code of Business Conduct document, which describes the minimum social and environmental standards expected from CGG suppliers, in particular regarding compliance with fundamental conventions on Labour and human rights.

During 2020 all new UK Suppliers were asked to comply with this document during their registration process to become a CGG UK Supplier, and we achieved 100% compliance with this.

COVID-19 PANDEMIC

The Covid-19 pandemic brought a unique set of challenges which could lead to an increase in modern slavery as businesses try to adapt to the situation. CGG took steps to manage the risks as they emerged, to guard against this happening within our organisation and our supply chains.

COVID-19 secure risk assessments were undertaken in all parts of the business to help us formulate mitigation plans to protect the health and safety of our employees, restaurant staff, cleaners, security, and any onsite contractors.
In line with UK Government guidance, CGG Services (UK) Limited facilitated homeworking for everyone who was able to work from home and all non-essential travel and face-to-face meetings were suspended. For those employees unable to perform their roles from home appropriate social distancing measures were implemented in all our business premises and CGG provided suitable personal protective equipment (PPE). All employees were encouraged to follow government advice on hygiene practices and our cleaning schedules were increased as appropriate.

Colleagues have received communications during the pandemic and have access to our Ethics Committee throughout this period. A range of materials designed to support physical and mental health and well-being have also been promoted and encouraged.

UK-SPECIFIC CHANGES IN BUSINESS ENVIRONMENT

CGG Services (UK) Limited was aware of the threat Brexit could pose to Britain’s efforts in tackling modern slavery and in early 2020 ran a series of risk assessments in all areas of the UK business to assess possible impacts on our Modern Slavery processes. These risk assessments were presented to senior management who concluded that there was no immediate perceived additional risk from Brexit in any area of the CGG UK business.

To date, UK operations have observed no discernible Brexit impact in our business activities. However, CGG Services (UK) Limited is aware that this will be a dynamic situation and so will continue to monitor the situation and address our supply chains to ensure continued protection for vulnerable workers from exposure to modern slavery in the UK after Brexit.

TRAINING TO RAISE AWARENESS

CGG trains personnel and partners to ensure a high level of understanding of the risks of modern slavery and human trafficking in its supply chains and business. For several years, the Group has pursued a program to educate and train employees in ethical practice and the principles and commitments of our Business Code of Conduct. Endorsed by the Ethics Committee, it is reinforced by the implementation of an e-Learning course for all employees, which was introduced in 2012.

CGG has a series of mandatory online training programs that all current CGG employees must periodically complete, and which are included in our onboarding of new employees. These include: Anti-Corruption, InfoSec (Information Security Awareness) Ethics@CGG, Trade Compliance Awareness and Prevention of Discrimination & Harassment.

In Q4 2020, CGG Services (UK) Limited launched a new mandatory ‘Zero Tolerance to Bullying and Harassment Workshop’, with the aim of all UK employees attending by Q4 2021. By the end of December 2020 29.2% of the UK workforce had attended this course.

CGG’S EFFECTIVENESS IN COMBATTING SLAVERY AND HUMAN TRAFFICKING

During 2020, CGG Services (UK) Limited extended its internal human rights audit for the lowest paid workers in our organisations to more of our UK sites. Any observations, or findings, were presented to senior management and acted on during 2020.

CGG’S PLANNED IMPROVEMENTS FOR 2021

Following a review of the effectiveness of the steps we have taken [this year] to ensure that there is no slavery or human trafficking taking place in our supply chains we intend to take the following further steps during 2021 to combat slavery and human trafficking:

• Raise awareness of the Anti-Slavery Day on 18th October via UK-wide activities and initiatives, with accompanying promotion in internal communications channels, to include; Newsflash emails to all UK CGG employees, articles in the CGG UK Newsletter highlighting CGG approach to Modern Slavery, printed and digital displays raising awareness of how our employees can recognise the signs of it in their everyday lives,

• Promote the Zero Tolerance to Bullying and Harassment training to achieve its target of 100% by Q4 2021.

• Research into CGG Services (UK) Limited offering awareness/training sessions from a modern slavery prevention charity (e.g. Unseen) with the aim to raise awareness of, and educate, employees from across the HR and Purchasing departments during 2021 in the potential threat of Modern Slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 31, 2020. It was approved by the Board of CGG Services (UK) Limited.

Crawley, September 2021.

Thomas Obidairo
UK Country Manager
CGG Services (UK) Limited