



# CGG SERVICES (UK) LIMITED UK MODERN SLAVERY ACT STATEMENT 2024



[viridiengroup.com/sustainability](https://viridiengroup.com/sustainability)



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.

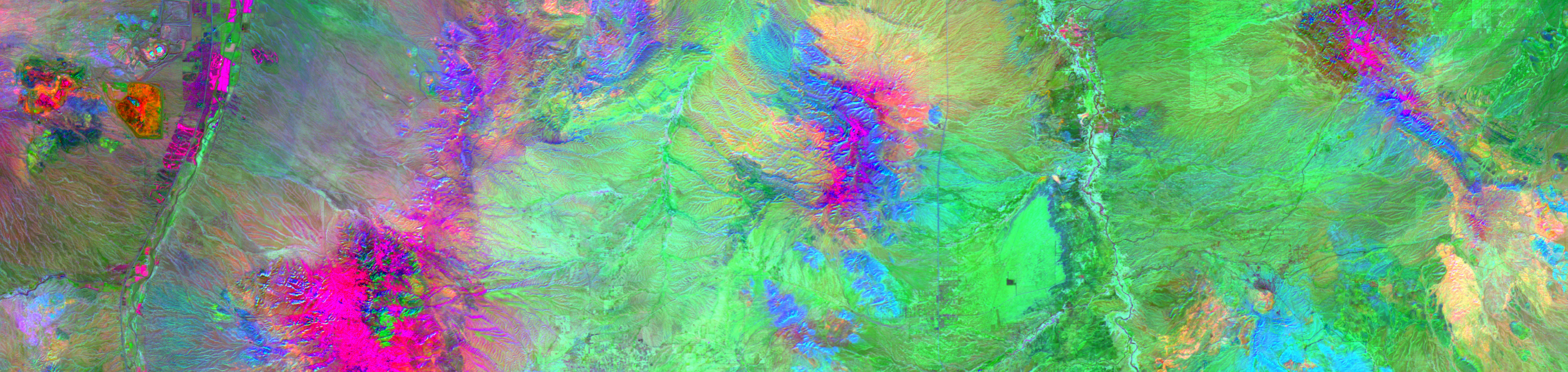
## ORGANISATION STRUCTURE AND BUSINESS

CGG Services (UK) Limited is a subsidiary of Viridien SA and forms part of the French Viridien Group of Companies ("**Viridien**") ([www.viridiengroup.com](http://www.viridiengroup.com)), an advanced technology, digital and Earth data company that pushes the boundaries of science for a more prosperous and sustainable future. With our ingenuity, drive and deep curiosity we discover new insights, innovations, and solutions that efficiently and responsibly resolve complex natural resource, digital, energy transition and infrastructure challenges. Viridien employs around 3,400 people worldwide and is listed on the Euronext Paris SA (ISIN: FR001400PVN6).

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

CGG Services (UK) Limited had a 2024 turnover of more than £36 million.





## SUPPLY CHAINS

CGG Services (UK) Limited's supply chain encompasses rental and maintenance of its facilities and IT equipment. During 2024 UK suppliers (with \$10K+ spend) represented 81.4% of the supply chain and 90.7% of the 2024 spend.

In 2024, CGG Services (UK) Limited purchased 94.7% of supplied goods and services from 'low risk' suppliers based in countries that have ratified at least nine of the eleven [International Labour Organization](#) ("ILO") fundamental instruments, which include forced labour (C020, P029, C105), child labour (C138, C182), discrimination (C100, C111), freedom of association (C087, C098) and occupational safety & health (C155, C187). This represented 96.2% of the 2024 spend.

In addition, 1.9% of the UK supply chain purchases were made through US-based suppliers (equalling 3.8% of the total 2024 spend). Although the US has not signed all eleven ILO conventions, as a member it respects the principles concerning the fundamental rights which are the subject of these conventions.

## POLICIES ON MODERN SLAVERY & HUMAN TRAFFICKING

To manage the risk of modern slavery and human trafficking in its supply chain, CGG Services (UK) Limited follows the Viridien Group policies and

management systems, which function in line with the Modern Slavery Act requirements.

These include:

- [Viridien Code of Business Conduct](#), published in ten languages, it sets out the rules and expected behavior to enable the Group to conduct its business with integrity. All employees must adhere to its principles and requirements. In this code, Viridien 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. Viridien expects all its subcontractors and suppliers to respect the same principles as detailed in the '[Viridien Supplier Code of Business Conduct](#)' document which all suppliers must comply with during their registration process – more details can be found in the following '[Suppliers' Adherence to our Values](#)' section.

During 2024, the Code of Business Conduct continued to be promoted using a variety of communication channels, including; company newsletters, town hall meetings, company intranet and internal social media channels.

- Viridien's **Business Ethics Policy**, last updated on 6 September 2024 and signed by the CEO, reiterates the Board of Directors and Executive Leadership Teams and all its stakeholders to comply with the highest ethical standards and conduct during our day-to-day business activities while giving their unequivocal personal support to the [Viridien Code of Business Conduct](#).

- Viridien's **HSE Policy**, published in June 2024, stipulates that Viridien recognizes all International ILO conventions and laws, and complies with all applicable national and industry HSE regulations.
- **Viridien Inclusion, Diversity, Equality and Action (IDEA) Policy**, published on 12 November 2024, which aims to create a work environment that values diverse thoughts, identities, cultures, and experiences, reinforcing Viridien's commitment to creating a workplace where inclusion is essential, and diversity and equity are celebrated daily.

More details can be found in the 3.3.4 Inclusion, Diversity and Equity section of the '[2024 Universal Registration Document](#)'. This document is published annually.

- An internal '**Caring for Human Rights and Communities**' document is available to all employees, containing Viridien's top-management commitment to respect and promote human rights, plus details on the rules and recommendations related to the eleven fundamental international ILO conventions (including the C029 convention on forced labour), and clearly stating that the minimum age to work for Viridien 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 for Viridien, or subcontracted to Viridien, are an exception (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 2024, this group represented 0% of the CGG Services (UK) Limited employee population.

- In 2024, as part of its commitment to being a responsible company, Viridien became a supporter of the [United Nations Global Compact](#) (UNGC), with CGG Services (UK) Limited joining the UNGC UK Network.

## MECHANISMS BY WHICH STANDARDS OR POLICIES ARE ENFORCED

Viridien's [Ethics Committee](#) endorses and promotes the Code of Business Conduct, ensuring that our standards are widely communicated and that all Viridien 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 Code of Business Conduct. The website and telephone lines are available 24/7, 365 days a year in 10 countries and in 10 languages.

The number of global alerts received in 2024 by the Ethics Committee are detailed in section 3.4.1.5. of the annually published '[2024 Universal Registration Document](#)'. There were three work-related claims



reported globally to the Ethics Committee, with the primary concerns raised by these complaints relating to conflicts of interest and human resources issues such as alleged unfair treatment, or harassment. All allegations were thoroughly investigated in accordance with our internal procedures, and after a comprehensive review, the Ethics Committee concluded there were no findings of misconduct as no supporting evidence was found, and the cases were subsequently concluded with an official report and recommendations and then closed. No fines, penalties or compensation for damages resulting from incidents and complaints were paid by the Company in 2024, and no violation or incident with regards to Human Rights was reported to the Ethics Committee.

As part of our global awareness initiative, during 2024 regular communications were sent to all employees via a variety of communication channels, including: email, posters, company intranet, internal social media and in-person presentations to employee representatives, with a total of nine worldwide communications regarding ethics and compliance being sent out.

As part of the initiative to identify risks inherent in and relevant to its activities, Viridien conducts a Double Materiality Analysis (DMA) every three years. The double materiality approach provides a holistic evaluation of how sustainability factors influence a company's operations (financial materiality) and the company's impact on environmental, social, and governance (ESG) matters (impact materiality).

The results from the most recent analysis and resulting key focus areas can be found in the '2024

[Universal Registration Document'](#) – section 3.1.4, found in the Investors section at [viridiengroup.com](#).

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

## SUPPLIER ADHERENCE TO OUR VALUES

As stated in the Code of Business Conduct, Viridien is committed to managing suppliers and subcontractors to ensure their respect of human rights.

Our relationship with suppliers is governed by a framework of Group policies and procedures (including our Sustainable Procurement Policy, our Code of Business Conduct plus specific procedures covering each step of sourcing, procurement and other interactions with suppliers) which are implemented within each business line and support unit. Designated Supply Chain Focus persons within each organization are responsible for ensuring that the performance of Viridien's suppliers is properly assessed, in accordance with minimum requirements covering all key aspects which could impact our performance and reputation.

The Purchasing department publishes a regularly updated [Viridien Supplier Code of Business Conduct](#) document, which all suppliers must endorse. This explicitly refers to the ten principles of the United

Nations Global Compact, the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development plus the United Nations Convention against Corruption. Furthermore, our Purchase Orders include the general terms and conditions of sale, which stipulate that the supplier confirms that it adheres to the strictest ethical rules, as well as to the "Supplier Code of Conduct". During 2024, no human rights violations or incidents involving our suppliers were confirmed at Group level.

Through this engagement, suppliers commit to strive to minimize the negative impacts of operations on communities where Viridien operates and to optimize potential positive impacts. Specifically, their commitment to Human and Labor rights, among others, includes not employing workers under the age of 16, not tolerating any unacceptable, humiliating, threatening, abusive or exploitative treatment of employees or supporting trafficking in human beings, and not making anyone work against their will.

During 2024 all new UK suppliers were asked to comply with this document during their registration process to become a CGG Services (UK) Limited supplier, and we achieved 100% compliance with this.

More details can be found in the '[2024 Universal Registration Document'](#) – section 3.4.2, found in the Investors section at [viridiengroup.com](#).

## TRAINING TO RAISE AWARENESS

Viridien 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, Viridien has pursued a program to educate and train employees in ethical practice and the principles and commitments of our Code of Business Conduct. Endorsed by the Ethics Committee, it is reinforced by the implementation of an e-learning course for all employees, and in 2024 workshops and presentations on our Code of Business Conduct, our Ethics Policy and Compliance program were organized throughout the year for the business lines, the support functions and the country managers.

Viridien has a series of six mandatory online training programs that all current Viridien employees must complete annually, and which are included in our onboarding of new employees. These include; **Prevention of Discrimination & Harassment**, **Anti-Corruption Awareness**, **Information Security Awareness (InfoSec)**, **Ethics@Viridien**, **Trade Compliance Awareness**, and '**Introduction to IDEA@Viridien**' which explores Inclusion, Diversity, Equity and Action within Viridien.

As of December 31st, 2024, the global completion of the mandatory Ethics e-learning course was 96%.

# EFFECTIVENESS IN COMBATTING SLAVERY AND HUMAN TRAFFICKING

During 2024, CGG Services (UK) Limited continued its internal human rights audit for the lowest paid employees in our organizations in our UK sites. Any observations, or findings, were presented to senior management and acted on.

CGG Services (UK) Limited observed its annual 'Anti-Slavery Day' campaign on 18th October 2024, with UK-wide activities and initiatives to raise awareness of how our employees can recognize the signs of slavery in their everyday lives and the various reporting channels available to them. Accompanying promotion was provided via internal communications channels e.g. Viva Engage.

# PLANNED IMPROVEMENTS FOR 2025


Following a review of the effectiveness of the steps CGG Services (UK) Limited have taken during 2024 to ensure that there is no slavery or human trafficking taking place in our supply chains, we intend to continue the following during 2025 to combat slavery and human trafficking:

- Review and expand the internal human rights audit for the lowest paid employees in our organizations in all our UK sites.
- Within our UK employee base, using the new internal social media communities, continue to expand the awareness of the risks of Modern Slavery and Human Trafficking, plus informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Ensuring UK employees involved in procurement activity are aware of, and follow, [modern slavery procurement guidance on GOV.UK](#).
- Continue to explore offering relevant training sessions in 2025 to raise awareness and educate employees involved in purchasing, procurement or recruitment and deployment of employees in the potential threat of Modern Slavery and ethical employment practice.

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, 2024, as approved by the Board of CGG Services (UK) Limited.

Crawley, July 2025.

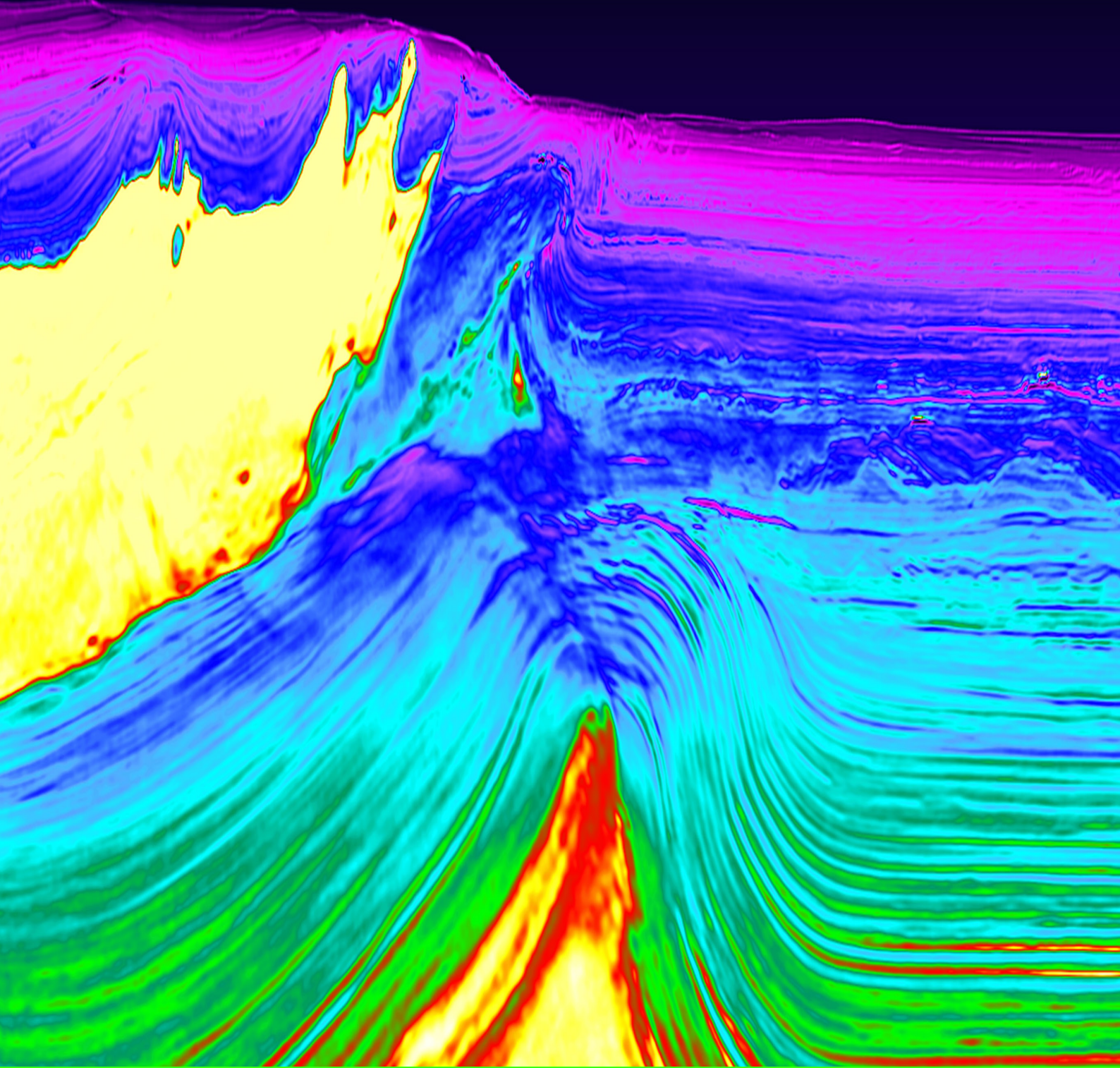


Peter Whiting

Director

CGG Services (UK) Limited





[viridiengroup.com/sustainability](https://viridiengroup.com/sustainability)

