

# **Modern Slavery Report for Computer Modelling Group Ltd. (“CMG”)**

## **Introduction**

This report is prepared pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for the financial year ending March 31, 2026 (the “Reporting Period”). The report outlines CMG’s efforts and commitments towards understanding and reducing the risks of modern slavery in our operations and supply chains.

## **Steps Taken to Prevent and Reduce Risks**

In general terms, CMG took the following steps during the Reporting Period to prevent and reduce the risk of forced labour or child labour in our business and supply chains:

- Ensured compliance with all applicable policies aimed at preventing unethical practices, ensuring that its operations and its service providers uphold the highest standards in relation to human rights in the workplace.
- Ensured that all service providers, including all directors, officers, employees, consultants and agents, be required to be in compliance with all applicable labour laws and observe internal policies and procedures that meet or exceed the requirements of applicable human rights and employment standards legislation
- Identified high-risk regions or vendors.
- Maintained a confidential whistleblower hotline accessible to employees and external contractors.
- Encouraged an open reporting culture and ensured we have processes in place to promptly investigate concerns, should they occur.
- Committed to annual reviews of the modern slavery prevention strategy.

Details of the above actions are set out in this report.

## **Our Structure and Activities**

CMG (TSX:CMG) is a corporation incorporated under the Alberta *Business Corporations Act* and is headquartered in Calgary, Alberta, Canada. CMG has wholly owned subsidiaries or offices in the United States, the United Kingdom, Colombia, Brazil, India, the United Arab Emirates, Malaysia, Norway and Germany. As at the end of the Reporting Period, CMG had 316 employees, of which 119 were located in Canada.

CMG is a global software and solutions company that combines science and technology with deep industry expertise to solve complex subsurface and surface challenges for the new energy industry around the world. CMG markets its products and services in approximately 60 countries.

## **Our Supply Chains**

CMG's supply chain is comprised of outsourced activities, functions, and services that would otherwise be undertaken by CMG, and any other arrangement that involves the provision of goods and services, or the storage, use or processing of data, or the delivery of business activities, functions, or services to CMG customers.

CMG procures goods and services from a range of third parties in different businesses including, but not limited to, information technology, telecommunications, real estate management, human resources firms, research and analytics, marketing, and consulting services.

The majority of third parties that CMG procures goods and services from are based in Canada and the U.S., with subsidiaries and regional offices relying on the provision of goods and services from a number of local third parties.

Major supply chains include both local and international provision of:

- (i) Cloud computing infrastructure;
- (ii) Software products and "Software-as-a-Service" services;
- (iii) Computer equipment and hardware;
- (iv) Consulting and professional advisory services;
- (v) Human resources and recruitment services;
- (vi) Real estate and premises management services.

## **Policy Framework**

CMG's commitment to ethical conduct is underscored by our comprehensive policy framework, which includes our Code of Business Conduct (the "Code"), Human Rights and Anti Harassment Policy, Whistleblower Policy, Anti-Corruption Policy, and other relevant policies aimed at preventing unethical practices, ensuring that its operations and its service providers uphold the highest standards in relation to human rights in the workplace.

### ***Code of Business Conduct***

The Code includes explicit prohibitions of modern slavery. In particular, the Code provides that CMG prohibits all forms of slavery including modern slavery, compulsory and forced labour, human trafficking and child labour in its business activities. All service providers, including all directors, officers, employees, consultants and agents, are required to be in compliance with all applicable labour laws and observe internal policies and procedures that meet or exceed the requirements of applicable human rights and employment standards legislation. CMG also expects its vendors and suppliers to respect human rights and to adhere to applicable international and domestic standards.

### ***Whistleblower Policy***

CMG, through its Whistleblower Policy, encourages the disclosure of conduct which results in a violation of law by CMG or its policies, including the Code. Services providers are encouraged to report concerns to CMG management (on an anonymous basis, if service providers so desire) or to raise those concerns by corresponding directly with the Chairman of the CMG Audit Committee, on an anonymous basis. CMG strictly prohibits discrimination, retaliation or harassment of any kind against any service provider who, based on that person's reasonable belief that such conduct or practices have occurred or are occurring, reports that information.

### **Due Diligence Processes**

CMG assesses and mitigates risks related to modern slavery and child labour in our operations and supply chains. This includes regular supplier reviews and assessments, and continuous monitoring of the first tier of our supply chain.

CMG manages the risk of forced labour and child labour via its policies, practices, and processes. We prioritize the adoption of responsible, equitable sourcing practices while ensuring effective management of our supply chain. For instance, CMG expects that the suppliers it does business with will be able to demonstrate that child labour and forced labour are not used in their activities.

The Company's due diligence process of identifying risks of forced labour or child labour within its internal operations and workforce is primarily executed via the hiring process and the ongoing review of compliance with applicable human rights legislation. This process is carried out by the Company's Human resources Department in conjunction with its Legal Department. In ensuring compliance with applicable laws and the Code, the Human Resources department is tasked with identifying facts constituting potential breaches of employment and human rights laws or policies and reporting those instances to the Legal Department. The Legal Department, in turn, must address the potential or actual violation by providing legal advice on how to remediate or avoid such instances.

In relation to services or goods provided within its supply chain as well as any temporary employment agencies, in all jurisdictions it operates, CMG typically includes standard contractual provisions requiring its contractors to comply with all applicable laws, including applicable employment and human rights laws. An uncured breach of such contractual provisions by the contractor would generally allow CMG to terminate the relevant agreement for cause.

## **Governance and Compliance**

CMG's governance and compliance framework ensures that ethical business practices are deeply embedded in our corporate culture. The Board of Directors, through its Talent Management, Governance, and Nominations Committee, oversees CMG's strategies and policies related to governance, compliance, and ethical conduct.

## **Risks of Forced Labour and Child Labour in our Operations and Supply Chains**

### ***Operations***

The Company has considered the risk of forced labour and child labour within its direct operations and is assessing it to be low. CMG's operations include presence in Colombia, Brazil, India, the United Arab Emirates, Malaysia, Norway and Germany. We recognize that the United Arab Emirates is included in the Global Slavery Index 2023 as being one of the countries with the highest prevalence of modern slavery. All employment relationships in each jurisdiction in which CMG operates are directly managed by the Company's Human Resources Department and Legal Department with careful attention to applicable employment and human rights laws. The Company's compliance with such laws is monitored internally on an ongoing basis. CMG complies with all labour laws in the jurisdictions of our operations, and all workers are paid more than the applicable minimum wage. In addition, CMG has in place policies to mitigate against the risk of forced labour in our operations. We do not hire anyone under the age of 18 in any of our areas of operation. We do not retain the passport or other identity document of any our workers. Finally, each of our workers has a written contract of employment in place.

### ***Supply chains***

CMG strives to work with suppliers who share our commitment to meet the highest ethical standards. In that regard, we conduct regular reviews of our suppliers' codes of conduct or similar instruments, conduct interviews where possible, and utilize questionnaires to understand our suppliers' commitments, policies, procedures, and controls. Such service providers are bound by written agreements containing obligations of the service provider to abide by all applicable laws in the applicable jurisdictions.

During the Reporting Period, we did not encounter any specific concerns. We have utilised the 2022 KnowTheChain Information and Communications Technology Benchmark report as part of our due diligence process and appreciate that some of the IT-related services that we source may be at higher risk for forced labour.

### **Remediation Measures**

During the Reporting Period, CMG did not identify or receive any reports of forced labour or child labour in our operations or supply chains. As a result, we have not had to take any measures to remediate any forced labour or child labour or to remediate any loss of income to vulnerable families.

CMG is continuously monitoring and working on strengthening its governance, compliance, and ethical conduct. We continue to be in the process of developing remediation measures in the event these become necessary.

## **Training**

During the Reporting Period, we continued reinforcing the importance of ethical business practices and required annual sign offs on policies, including the Code. We intend to begin offering training sessions addressing forced labour and child labour risks in 2027.

## **Assessment of Effectiveness**

CMG understands that it has a responsibility to continue to assess and mitigate the risk of modern slavery in its operations and supply chain over the long term. We have begun to take steps to understand and reduce these risks and to review the effectiveness of our policies and processes by evaluating the outcomes of our vendor assessments and making necessary adjustments to our strategies. However, we have not yet taken other actions to assess the effectiveness of our actions more broadly.

## **Future Commitments and Improvements**

CMG is dedicated to continuous improvement of our labour compliance and ethical conduct policies. We are committed to being at the forefront of ethical business practices in the technology sector.

## **Approval and Attestation**

This report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Computer Modelling Group Ltd.

**In accordance with the requirements of the Act, and in particular section 11 thereof, I attest for and on behalf of the Board of Directors that the Board of Directors has reviewed the information contained in the report for the entity listed above. Based on the knowledge of the Board of Directors, having exercised reasonable diligence, I attest for and on behalf of the Board of Directors that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.**

**I have the authority to bind Computer Modelling Group Ltd.**

Per: \_\_\_\_\_  
Name: Pramod Jain  
Title: Director and CEO  
Date: May 31, 2026

