

## Corporate Responsibility

CTG's principles in terms of labor laws, human rights, workplace safety, business ethics, and the environment are demonstrated by the practices described below:

- [Ethical, social, and business practices](#)
- [Environmental practices](#)

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### *Ethical, Social, and Business Practices*



CTG is committed to the highest standards in our labor practices, health and safety of our employees, and ethical business practices.

**Labor practices:** CTG currently has business operations in North America and Europe. These regions have strict labor laws regarding human rights, which are intended to prevent violations such as child or forced labor. CTG embraces these laws, and has numerous internal administrative policies that are intended to ensure CTG's compliance with these laws. Furthermore, we will not knowingly transact business with vendors or clients who violate these basic human rights.

The management of contract labor is one of our core competencies--in no small measure because our clients depend on us for this service. As such, we are highly focused on adhering to The Fair Labor Standards Act, local labor laws, and prevailing wage rates. We cross-reference all client job titles to CTG job titles, which must meet the standards of The Fair Labor Act to ensure proper pay. We have weekly audits that review all new employees to ensure compliance. In addition, we continually survey the labor market to stay current.

We have a zero tolerance for workplace harassment of any kind, an open policy of communication including formal whistleblower and issue resolution policies, and a spotless US Equal Employment Opportunity Commission (EEOC) record.

**Health and safety:** The vast majority of CTG employees work offsite at client locations. CTG owns office space for its corporate staff and leases office space for its branch locations, none of which is subject to industrial hazards. We will not knowingly transact business with companies who do not enforce appropriate safety and health standards in their work environments. We are continually assessing and upgrading our owned property, and the corporate real estate and facilities management team is empowered to work with leasing managers to resolve issues with leased space compliance. We also adhere to Occupational Safety and Health Administration (OSHA) office standards.

**Business ethics:** As a baseline for business ethics, all CTG employees are required to follow our employee code of conduct as articulated in our employee handbook. Throughout our 45-year history as a company, CTG management has committed to verifiable business integrity. We have a well-documented, process-driven quality system that has earned us ISO 9001:2008 certifications in North America and Europe, and we are subject to continuous quality, as well as traditional auditing processes. In addition, we are highly supportive of, and compliant with, corporate accountability legislation such as the Sarbanes Oxley Act of 2002.

We believe our services stand on their own merits and will not seek unfair advantage. We are also committed to the protection of both CTG's and our clients' intellectual property (through the use of employment agreements) and the confidential information of our employees and clients (through employment agreements, password protection, and limited access).

**Supporting practices:** The following processes help ensure conformance to our ideals:

- ISO 9001:2008 certification for our North American and European operations
- Internal and external accounting and operational audits
- Weekly new hire conformance audits
- Employee code of conduct
- Risk assessment and mitigation methodology
- Adherence to OSHA office standards
- Whistleblower processes
- Online access to policies and procedures
- Training and orientation processes

### *Environmental Practices*

In 2011 CTG initiated a formal plan to centrally manage our environmental initiatives and policies, and a living document that permits us to continue to improve our environmental footprint both as individuals and as a company. CTG's environmental strategy has three areas of focus:

**1) Leveraging our greatest asset: people.** As a company that provides IT services to our clients, CTG's resources are our people. For this reason, much of our potential environmental impact improvements come from the efforts of each of our employees to be environmentally conscious corporate citizens, and to take those same principles with them into other aspects of their lives.

To support this effort we will:

- Clearly state our policies, initiatives, measurements, and results
- Continue to offer and expand training opportunities
- Continue to support environment-focused events such as Earth Day programs
- Continually raise awareness of environmentally sound practices within our company through policy manuals, in-house publications, and our websites

**2) Being wise consumers.** CTG is committed to purchasing from vendors who share our concern for the environment and to purchasing products that are, wherever possible, environmentally friendly.

Since the vast majority of our office space is leased, we will seek out property management companies that offer environmentally friendly space and afford us services, such as recycling programs, that support our environmental goals.

**3) Being good stewards.** CTG owns two buildings located in Buffalo, New York, that house our corporate headquarters. Rather than build new facilities, we have elected to restore and reuse older buildings.

One of the buildings, located at 800 Delaware Avenue, was completed in 1918 and is located in a historical district of Buffalo that restricts types of renovations that can be made.



*CTG's corporate headquarters are located in a historical district of Buffalo.*

The second, located at 700 Delaware Avenue, was completed in 1956, and while not a historical site, is also within the aforementioned historical district, which restricts the types of renovation that can be made.

Both of these buildings present challenging property management issues. Nevertheless, we have been able to make significant improvements to reduce their energy footprint over our years of ownership. We have plans for several more improvements over the next few years, and believe

that improvements in technology will give us an overall energy usage improvement of two to three percent per year.

There are currently no environment regulatory actions pending against CTG.