
Whistleblowing Policy

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1. Definitions

CGI Global – The Chartered Governance Institute.

CGI entities – All branches, Divisions, subsidiaries, and affiliated bodies operating under the CGI name or governance structure.

Charter and Byelaws – The governing documents of CGI Global that set out its constitution, powers, and rules for operation and member conduct.

Code of Conduct – The set of principles and standards of professional behaviour expected of all CGI members, Workers, and representatives as approved by Council from time to time.

Committee member – An individual appointed by the CGI Global Council to serve on a committee, including standing or ad hoc, to carry out specific responsibilities delegated by the Council in accordance with the Charter and Byelaws.

Complaint – An act of misconduct, malpractice, or irregularity that an individual reasonably believes that CGI Global or a CGI Division or someone connected to it is committing, has committed, or is likely to commit

Concern – A matter raised by an individual regarding potential risks, issues, or behaviours that may not meet the threshold of a formal complaint but could affect the integrity, reputation, or operations of CGI Global or its Divisions

Council – The CGI Global Council responsible for strategic oversight and governance of CGI Global.

Council member – An individual elected or appointed to serve on the CGI Global Council, acting in the interests of the membership as a whole and subject to the duties and terms defined in the Charter and Byelaws.

Division – A country, territory or group of countries or territories designated as a Division under the Byelaws.

Designated officers – The President, Past-President, Director General and the Institute Secretary of CGI Global responsible for receiving and managing Complaints raised under this policy.

Investigation Group – The standing body comprising the Designated Officers of CGI Global, responsible for determining whether an investigation is required, appointing an Investigator, overseeing the investigative process, and determining appropriate outcomes.

Investigator – A person appointed by the Investigation Group to conduct an impartial investigation into a reported Complaint.

Members – Individuals who have been admitted to membership of CGI Global in accordance with its Charter and Byelaws.

Stakeholder – Individuals or groups with an interest in CGI Global's operations, including members, Workers, regulators, and the public.

Worker – Any individual employed by CGI Global on a full-time, part-time, temporary, or fixed-term basis including contractors and agency staff.

2. Introduction

CGI Global is committed to maintaining a high standard of openness, probity, and accountability. In line with this commitment, we encourage stakeholders to raise complaints about any suspected misconduct, malpractice, or irregularities. This policy provides a confidential mechanism for reporting such complaints and ensures that all reports are addressed fairly and appropriately.

3. Scope

This policy is designed to encourage CGI Global /Divisional-related stakeholders including employees, consultants, Council members, and Committee members, Members and others to raise both formal complaints and informal concerns, including the option to do so anonymously. Concerns may be raised where an individual is unsure whether the matter constitutes a complaint, or where they wish to bring a potential issue to the attention of CGI Global without triggering a formal investigation.

This policy applies to all CGI Global entities, including Divisions and affiliated bodies. Where a Division has its own whistleblowing policy, complaints or concerns relating specifically to that Division will, in the usual course, be handled under the Divisional policy. However, complaints may be escalated to CGI Global where:

- the matter involves more than one Division or has broader implications for CGI Global as a whole.
- the complaint relates to the conduct of a member of the CGI Global Council or Designated Officers.
- the Division requests support or referral to CGI Global.
- or where required by law or the nature of the complaint.

Jurisdictional Precedence:

Where there is any conflict between this policy and a Divisional Policy, the requirements of local law and the principles of this policy shall prevail to the extent possible.

4. Definition of Complaint

A Complaint under this policy refers to an act of misconduct, malpractice, or irregularity that an individual reasonably believes that CGI Global or a CGI Division or someone connected to it is committing, has committed, or is likely to commit. Examples of complaints may include but are not limited to:

- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- fraud, money laundering or misappropriation of funds;
- offering or accepting a bribe;
- financial irregularities;
- undisclosed conflicts of interest;
- failure to properly manage a conflict of interest;
- unauthorised use or disclosure of confidential information or intellectual property;
- serious or systemic breaches of any of CGI Global's policies or Code of Conduct;
- failure to comply with the Charter, Byelaws and /or Divisional governance requirements;
- failure to comply with, or breach of, legal or regulatory requirements;
- engaging in or threatening to engage in detrimental conduct against a person who has raised a Complaint or is believed or suspected to have made or be planning to raise a Complaint;
- discrimination, harassment, bullying, or victimisation; and
- deliberate concealment of any of the above.

It is not necessary for an individual to have proof that such an act is being, has been, or is likely to be committed. However, they must have a reasonable belief that the information disclosed is accurate. Individuals are not responsible for investigating the matter themselves; it is CGI Global's (or relevant CGI Divisions) responsibility to ensure that an investigation is carried out fairly and properly once a Complaint is raised.

5. Protection and confidentiality

CGI Global is committed to protecting complainants and other related parties from any detriment or threats of detriment because of a disclosure raised under this Policy, or because of a belief or suspicion that such a disclosure is proposed to be made. These protections are an essential element of creating an environment in which complainants feel safe to raise a Complaint. CGI Global and CGI Divisions will seek to protect a person experiencing any detrimental conduct on the basis of raising a Complaint in good faith including:

- termination of employment or engagement;
- injury of an employee in their employment or alteration of their duties to their disadvantage;
- harassment or intimidation;
- harm or injury;
- damage to property, reputation, business, financial position, or any other damage;
- discrimination; and
- any other action that can be perceived as retaliation for making a Complaint.

The complainant should tell a Designated officer (preferably the Designated officer to whom they made their initial Complaint) if they are concerned that they may be, are, or have been victimised in any way. CGI Global and / or the CGI Division will treat this seriously.

If a person making a Complaint feels their report of victimisation was not resolved adequately, they can escalate their case in writing to the CGI Director General and the CGI President who will investigate the matter and the process for how the alleged victimisation was dealt with.

Any person involved in victimising conduct may be subject to disciplinary action (including but not limited to termination of employment or engagement).

CGI Global may also take steps that are reasonably necessary to protect a person making a complaint or another person from detriment.

CGI Global will make every reasonable effort to protect the confidentiality of an individual who raises a Complaint and their identity will not be disclosed without their prior consent.

To maintain the confidentiality of a Report of a Complaint, CGI Global takes a number of steps including:

- a. limiting access to information relating to the disclosure of the complaint;
- b. carefully reviewing and potentially de-identifying certain aspects of your disclosure as appropriate; and
- c. using tools, platforms and external expertise that allow disclosures to be made

anonymously.

If a Complaint cannot be resolved without revealing the identity of the individual, CGI Global will engage in a dialogue with the individual to determine whether and how to proceed. If it becomes necessary to disclose the individual's identity during an investigation or legal process, CGI Global will, where possible, inform the individual in advance. In situations where an investigation results in criminal proceedings, the individual may be required to provide evidence and or co-operate with the relevant authorities. To avoid compromising the investigation, individuals are also expected to keep confidential the fact that a report has been made, the nature of the Complaint, and the identities of those involved.

The individual/s who is the subject of the Complaint must not attempt to:

- a. discover the identity of the party who has raised the Complaint,
- b. disclose that they are the subject of a Complaint made under this Policy;
- c. or seek to retaliate against that person(s).

6. Procedure

Investigations and actions taken under this policy will be conducted in compliance with the legal requirements of the relevant jurisdiction. Where necessary, advice will be sought to ensure that local legal obligations are met.

The Council through the powers given in CGI Global Byelaw 3, delegates its authority to form the CGI Global Disciplinary bodies as defined in Byelaws 21, 23 and 25 to the Executive Oversight Committee (EOC). The EOC has therefore established a standing Investigation Group comprised of Designated Officers being the Council President, Past President, Director General, and the Institute Secretary. If any of the persons set out in Byelaw 22 are associated with the Complaint raised, that person will be excluded from all notifications, conversations and communications on the matter under investigation.

Where a Concern is raised that does not meet the threshold for a formal Complaint, the Designated Officer will review the matter and determine whether further action, monitoring, or referral is appropriate. Concerns may be logged and monitored to identify trends or emerging risks, even if no immediate action is taken.

Any Complaint should be reported immediately to one of the CGI Designated Officers. When raising a Complaint, as much information as possible should be provided, including details of the Complaint, people involved, dates, locations, and any evidence (including documents or other witnesses) that may exist.

When a Complaint is raised under this Policy, the Investigation Group will decide if a full investigation is necessary. If an investigation is deemed necessary, the Investigation Group will appoint an Investigator to assess the matter. The Investigator will gather as much information as possible from the individual(s) raising the Complaint; this may include supporting evidence and identifying witnesses. Further, the Investigator will, as soon as practicable, assess and monitor the risk of detriment to the person who has raised a Complaint and develop strategies to deal with any such risk and take appropriate steps to manage confidentiality and support an investigation. No more than two weeks should elapse between the raising of a Complaint and the Investigator contacting the individual.

The support offered by CGI Global to a person who has raised a Complaint includes:

- a. support from the Investigator who will be available to contact at any time;
- b. an independent support person appointed by the Investigation Group to support the discloser; and/or
- c. referring the discloser to external independent support providers.

Individuals raising a complaint will be provided with information about the relevant procedures upon request or at the commencement of the investigation, as appropriate.

The Investigation Group will provide periodic updates to a person who has raised a Complaint on the progress of the investigation (including in relation to timeframes) if they are able to be contacted. The frequency and timeframe of these updates may vary depending on the nature of the Complaint raised. These updates may include the following:

- a. confirming receipt of notification of a Complaint;
- b. advising that an investigative process has begun (where an investigation is appropriate);
- c. providing updates on investigation status (even if there has been no progress);
- d. advising when an investigation has been closed.

A person to whom a complaint relates will be advised of the substance of the allegations made against them and offered an opportunity to respond, as soon as is practicable. However, notification may be delayed or withheld if the complaint is made anonymously, or if the complainant has requested confidentiality and notification would risk revealing their identity. In such cases, notification will occur only when it is reasonably practicable to do so without compromising the complainant's confidentiality or the integrity of the investigation. The reasons for any delay or withholding of notification will be documented.

CGI Global reserves the discretion to either investigate the Complaint itself or to pass the Complaint to a Division for handling. In cases where the complaint is passed to a Division, the Division is required to report back to CGI Global with the findings and any actions taken.

When an allegation relates to a named individual, the person concerned will be informed of the allegation as part of the investigation and/or before any conclusion is reached. The point at which it is appropriate for the individual to be informed will depend on the nature of the case.

After the initial contact with the individual raising the Complaint, the Investigator will begin an investigation and gather all relevant information. The investigator will then report to the Investigation Group who will determine what, if any disciplinary action is necessary. This may include but is not limited to terminating or suspending the employment or engagement of a person(s) involved in any misconduct, or other measures as may be appropriate at CGI Global's discretion. Cases of suspected corruption or criminal activity will be reported to the relevant authorities and once this is done, CGI Global will not take further action on the matter. Any investigation carried out by the Investigation Group should take account of the applicable whistleblowing legislation in the jurisdiction from which the Complaint originates.

The outcome of the investigation will be communicated by the Investigation Group to the individual who raised the Complaint and simultaneously to the individual(s) subject to the Complaint. If no action is to be taken, the Investigator will explain the reasons. However, due to legal constraints, it might not be possible for the Investigator to provide details of the action taken and provide a copy of the Investigator's report. Any report remains the property of CGI Global.

7. Anonymous reporting

CGI Global prefers that individuals identify themselves when raising either a concern or a Complaint, as named disclosures generally carry more weight and allow for more effective follow-up. However, some individuals may not feel comfortable doing so. In such cases, anonymous reports may still be submitted and will be considered at CGI Global's discretion, taking into account the seriousness of the issue, the credibility of the Complaint, any supporting evidence provided, and the likelihood of verifying the allegation through alternative sources.

Where a complaint or concern is raised under a Divisional Policy, the procedures for anonymous reporting and support will be as set out in that policy. Where a matter is escalated to CGI Global, the provisions of this policy will apply.

False allegations

If an individual makes a false allegation maliciously, with an ulterior motive or for personal gain, CGI Global reserves the right to take appropriate action. Where the individual is a CGI member, they may be subject to disciplinary proceedings in accordance with the CGI Global Charter and Byelaws. If the individual is a Worker, they may face disciplinary action, including termination of post where appropriate, in line with the appropriate Policy.

8. Record retention

Records shall be kept for all reported complaints by CGI Global. In the event a reported complaint leads to an investigation, all relevant information relating to the case shall be retained, including details of corrective action taken, for a period as long as considered necessary by the CGI Global Council or a period may be specified by any relevant legislation.

Records of complaints handled under a Divisional Policy will be retained in accordance with that policy and applicable law. Where a matter is escalated to CGI Global, records will be retained in accordance with this policy.

Whistleblowing Reporting Form

Confidential

CGI Global is committed to maintaining a high standard of openness, probity, and accountability. In line with this commitment, we encourage stakeholders to raise Complaints about any suspected misconduct, malpractice, or irregularities.

It is recognised that in most cases the person raising complaints will wish to be dealt with on a confidential basis. All reasonable efforts will therefore be made to avoid revealing the person's identity.

If you wish to make a written report, please use this report form and send to the Designated Officers by post or email;

President president@cgiglobal.org;
Director General dq@cgiglobal.org;
Institute Secretary is@cgiglobal.org;
Past President pastpresident@cgiglobal.org.

CGI Global, 6-10 Kirby Street, London, EC1N 8TS, United Kingdom.

Your details

Name

Email:

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Once completed, this report becomes confidential.

The names of those involved (if known):

Details of Complaint:

Please provide full details of your Complaint: name, dates and places and the reasons for the Complaint (continue on separate sheet if necessary) together with any supporting evidence.