

# Public Servants Disclosure Protection Act (PSDPA)

## Description of Wrongdoing

In September 2025, an employee of the Canada Infrastructure Bank (CIB) made a disclosure to their supervisor alleging that a wrongdoing, within the meaning of the *Public Servants Disclosure Protection Act* (PSDPA), may have been committed by another CIB employee.

## Summary of findings and actions taken

It was alleged that a senior employee approved subscriptions for software published by a company in which the individual appeared to be a director and the sole shareholder. The employee did not disclose the apparent conflict of interest and did not recuse themselves from approving the subscription or related invoice payments. The employee also did not follow CIB's procurement processes and internal approval requirements in obtaining the software subscription.

A third-party firm was retained to investigate the allegations and provided a final report in March 2026. The report concluded that the employee failed to disclose relationships with certain companies in which they were a director or shareholder and acted in a conflict of interest during the procurement process without recusing themselves. The report also concluded that the software procured had no apparent benefit to the CIB and that the subscription appeared to have been initiated and approved for the employee's personal benefit. These actions were serious breaches of CIB's *Code of Conduct for Personnel* and *Conflict of Interest Policy for Personnel* and constituted wrongdoings as defined by the PSDPA.

The third-party firm also made recommendations as to internal control improvements that the CIB could undertake to prevent similar acts of wrongdoing in the future.

## Corrective actions recommended

The investigation report and the recommended internal control improvements were provided to the Chief Executive Officer for consideration and direction. The recommended corrective actions focused on strengthening (i) procurement-related controls for vendor and invoice approval processes, including improved segregation of duties, (ii) conflict of interest disclosure review and documenting mitigation strategies when disclosures are made, (iii) controls over master vendor records, and (iv) controls over IT supervisor-level access.

## Implementation of corrective action

The CIB has completed its annual acknowledgment of compliance and conflict of interest disclosures under the *Code of Conduct for Personnel*. The CIB is implementing the recommended internal control enhancements as part of its scheduled review of procurement processes, including updating procedures and approval workflows. Additional control changes (including system access and vendor master controls) are being planned and implemented in a phased manner.

After careful consideration of the findings, the employee's employment with the CIB was terminated. In addition, the CIB notified law enforcement of the wrongdoing.