

THE INTEGRITY LEARNING SERIES

Anticorruption and Integrity Training

22 May 2026



WELCOME

Meet your facilitator



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Senior Integrity Specialist

WELCOME

Agenda for the day

Session 1 Integrity, and your role	15 mins
Session 2 Integrity risk, prevention, due diligence	
Session 3 Debarment and suspension	25 mins
Session 4 Prevention and integrity due diligence in practice	
Session Wrap-Up / Q&A	10 mins

01

Integrity Foundations



SECTION 1

Integrity, ADB, and Your Role

This session will cover:

Why integrity matters in development projects and what ADB expects from you.

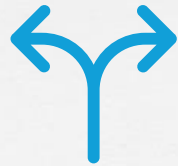
1. Why integrity risks matter in ADB-financed projects.
2. How integrity fits into ADB's way of working.
3. What is your role in preventing and managing integrity risks.

SECTION 1

Why do the highest standards of integrity matter on ADB projects?



It protects development impact



It supports better decision making



It strengthens trust



It protects you and the institution



It saves time and effort

SECTION 1

ADB's Anticorruption and Integrity Framework

Applies to executing and implementing agencies, contractors, consultants, suppliers, ADB staff, and anyone connected to an ADB-financed, -administered, or -supported activity.

Download your copy from www.adb.org/integrity



SECTION 1

How does this relate to your role?

Auditor General *Independent audit and assurance*

OAI *Specialist advice and investigation*

ADB Project Team *First line of support*

ADB Integrity System

EAs / IAs *Identify and mitigate risks; escalate concerns*

EAs/IAs involved in ADB-supported activities

Conduct integrity due diligence, spot red flags, manage integrity risk, and escalate to OAI where necessary

ADB Project Team

First point of support for identifying and managing integrity issues on the ground

Office of Anticorruption and Integrity (OAI)

Conducts investigations, provides specialist support, and builds integrity capability

Auditor General

Independent audit and assurance of ADB's integrity risk management



SECTION 1

Your Role as Executing and Implementing Agencies

Your primary role is to protect project outcomes and public value by implementing the project fairly and with integrity.

To achieve this, you need to **conduct integrity due diligence, spot integrity red flags, manage integrity risk, and report integrity violations** to OAI for assessment and further investigation as warranted.

SECTION 1

Your Role as Executing and Implementing Agencies

This includes:



Trust, but verify—especially in areas prone to abuse (finance and administration, tax privileges, personal use of ADB resources)



Promote a strong integrity due diligence practices at your team level



Encourage and participate in conversations about integrity red flags and violations in your team



Support OAI as frontline partners to manage elevated integrity risks



Report suspected violations to OAI when found in ADB projects.



Cooperate with OAI investigations

02

Integrity Risk, Prevention, and Due Diligence



SECTION 2

Integrity Risk, Prevention, and Due Diligence

This session will cover:

What does a systemic view of an integrity risk management look like.

1. What does a system of integrity risk management look like.
2. Reflection on your own integrity risk management approach.

SECTION 2

Integrity Violations

The following are integrity violations as defined by ADB:

MDB-Harmonized Definitions



} Harmonized definitions enable mutual enforcement of debarment decisions across multilateral development banks.



SECTION 2

We need a strong system of integrity risk management



Integrity due diligence process

A systematic, repeatable integrity due diligence process that:

- Uses good data
- Maintains clear documentation
- Enables defensible decisions



Spotting red flags early

Continuous processes to monitor and identify red flags.

Escalating a red flag is good risk management, not an accusation.



Assessing and managing risk

Once a red flag is identified, it is important to:

- Understand what it may mean for the process or project
- Assess potential integrity risks
- Take proportionate risk-mitigation or preventive actions

SECTION 2

We need a strong system of integrity risk management



Escalation and reporting

Where there are allegations, suspected violations, or grounds for suspension, matters must be escalated and reported in line with organizational requirements (regardless of other risk management actions taken).

For ADB-supported projects, relevant cases should be escalated to OAI.



Investigations and enforcement action

There is a trusted capability to conduct investigations, document findings, and apply appropriate actions where violations are confirmed.

Consequences may include contractual remedies, corrective actions, or strengthened controls that reinforce accountability and deter future misconduct.

SECTION 2

How is integrity risk management applied in practice

1

There is a systematic, repeatable process

2

The tools to conduct integrity due diligence are accessible

3

Documentation is consistent and clear, and decisions are defensible

4

Identified integrity risks are actively mitigated

5

There is a clear red flag escalation process

6

Monitoring continues after approval or award and throughout implementation

03

Debarment and Suspension



SECTION 3

Debarment and Suspension

This session will cover:

How debarment and suspension work, what the registers are for, and how to use them in practice.

1. What debarment and suspension mean in ADB related projects.
2. How to access and use the ADB Debarment and Suspension Register.

SECTION 3

Your Role as Executing and Implementing Agencies

Key takeaway:

Sanctions screening is the first step to integrity due diligence.

SECTION 3

What is debarment and suspension?

Debarment

- A formal sanction where ADB prohibits a firm or individual from participating in ADB-related activities.
- Can be time-bound and reinstatement may be with conditions.

Suspension

- A temporary restriction while an integrity concern is being assessed or investigated.
- No final finding has been made yet.

WHY THIS MATTERS

Debarment and suspension are ADB's primary tools to enforce integrity requirements.

SECTION 3

What is Sanctions Screening?

Sanctions Screening

Checking whether bidders, suppliers, contractors, or consultants appear on ADB's Debarment and Suspension Registers and the UN Consolidated Sanctions List.

WHY THIS MATTERS

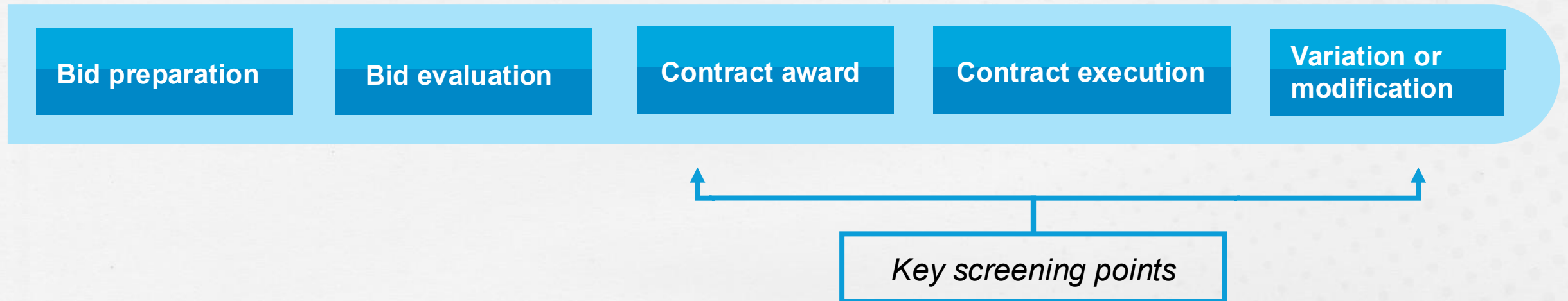
Sanctioned or suspended firms and individuals are **not eligible** to participate in ADB-related activities.

WHO IS RESPONSIBLE

Executing Agencies are required to apply sanctions screening at **all stages of the procurement and project delivery process.**

SECTION 3

Executing Agencies are Responsible for Sanctions Screening



SECTION 3

Debarment Checks

<http://sanctions.adb.org>

PUBLISHED LIST

Accessible to the public

The screenshot shows the ADB Debarment and Suspension Register website. The header includes the ADB logo and navigation links: Home, ADB Debarment and Suspension Register, Resources, Other Sanctions Lists, and Contact Us. The main heading is "ADB Debarment and Suspension Register". Below it is a paragraph explaining that the page lists entities temporarily suspended and debarred by the ADB, and those cross-debarred by ADB in accordance with the Agreement for Mutual Enforcement of Debarment Decisions with other Multilateral Development Banks (MDBs). These entities are not eligible to participate in ADB-financed, -administered, or -supported activities.

Two callout boxes are present:

- NO LOGIN REQUIRED** Publicly Disclosed Debarment or Suspension. Below this is a button: "View Publicly Disclosed Debarment or Suspension".
- AUTHORIZED USERS ONLY** Complete ADB Debarment and Suspension Register. Below this is a button: "View Non-Publicly Disclosed Debarment".

Under the "NO LOGIN REQUIRED" section, it lists what you will see in this subregister:

- Debarments that have institutional considerations
- Debarments associated with the violation of a previous debarment
- Second and subsequent debarments
- Debarred entities (firms and individuals) who are uncontactable
- Cross debarred entities
- Subset of the ADB Debarment and Suspension register

Under the "AUTHORIZED USERS ONLY" section, it lists what you will see in the register:

- Published Debarments
- Non-published Debarments
- Temporary suspension

Below this, it asks "How do I get access to this list?" and provides instructions: "This is a secure application operated by ADB for its official business. Only those given access to the application can access the list." It then lists three steps: 1. For registered users, please proceed by **Login**. 2. If you're a **qualified user** requiring access to the complete sanctions list, please **Sign Up**. 3. If you have problems submitting the online application, please download the **Application Form**, complete it and email to integrity@adb.org.

COMPLETE LIST

Password-protected, accessible to:

- ADB staff
- BoD
- Parties with a "need to know": international organizations, bilateral and government partners
- EAs and IAs



SECTION 3

Registration to the ADB Debarment and Suspension Register

Please scan the QR code and follow the step-by-step instructions on the next slides.

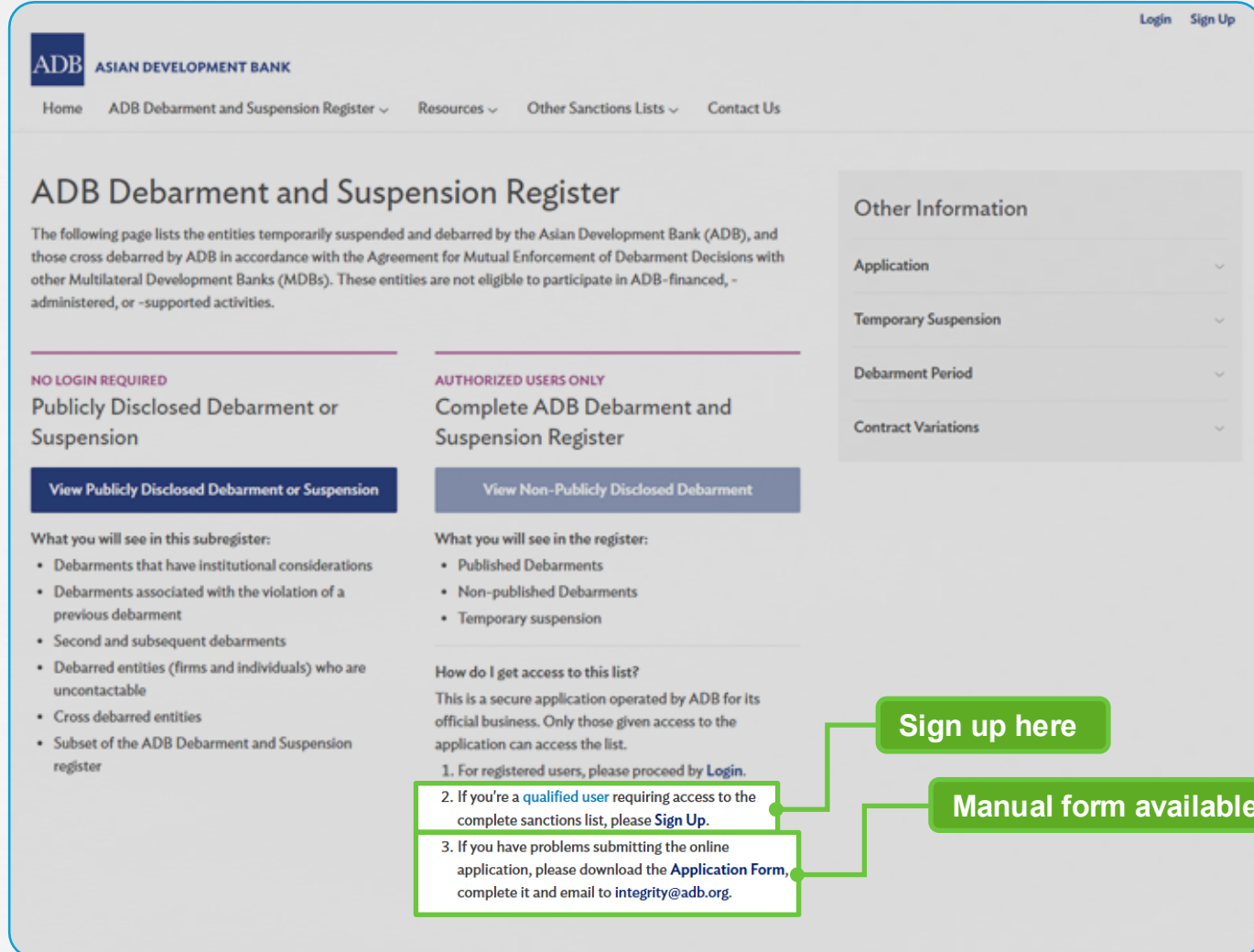


Scan the **QR Code** to begin registration

SECTION 3

Debarment Checks

 <http://sanctions.adb.org>



ADB ASIAN DEVELOPMENT BANK

Home ADB Debarment and Suspension Register Resources Other Sanctions Lists Contact Us

ADB Debarment and Suspension Register

The following page lists the entities temporarily suspended and debarred by the Asian Development Bank (ADB), and those cross debarred by ADB in accordance with the Agreement for Mutual Enforcement of Debarment Decisions with other Multilateral Development Banks (MDBs). These entities are not eligible to participate in ADB-financed, -administered, or -supported activities.

NO LOGIN REQUIRED

Publicly Disclosed Debarment or Suspension

[View Publicly Disclosed Debarment or Suspension](#)

What you will see in this subregister:

- Debarments that have institutional considerations
- Debarments associated with the violation of a previous debarment
- Second and subsequent debarments
- Debarred entities (firms and individuals) who are uncontactable
- Cross debarred entities
- Subset of the ADB Debarment and Suspension register

AUTHORIZED USERS ONLY

Complete ADB Debarment and Suspension Register

[View Non-Publicly Disclosed Debarment](#)

What you will see in the register:

- Published Debarments
- Non-published Debarments
- Temporary suspension

How do I get access to this list?

This is a secure application operated by ADB for its official business. Only those given access to the application can access the list.

1. For registered users, please proceed by **Login**.
2. If you're a **qualified user** requiring access to the complete sanctions list, please **Sign Up**.
3. If you have problems submitting the online application, please download the **Application Form**, complete it and email to integrity@adb.org.

Other Information

- Application
- Temporary Suspension
- Debarment Period
- Contract Variations

Sign up here

Manual form available

SECTION 3

Debarment Checks

The screenshot shows the 'Application Form' on the ADB website. The form is titled 'Application Form' and includes a header with the ADB logo and navigation links. The main content area contains several sections of input fields:

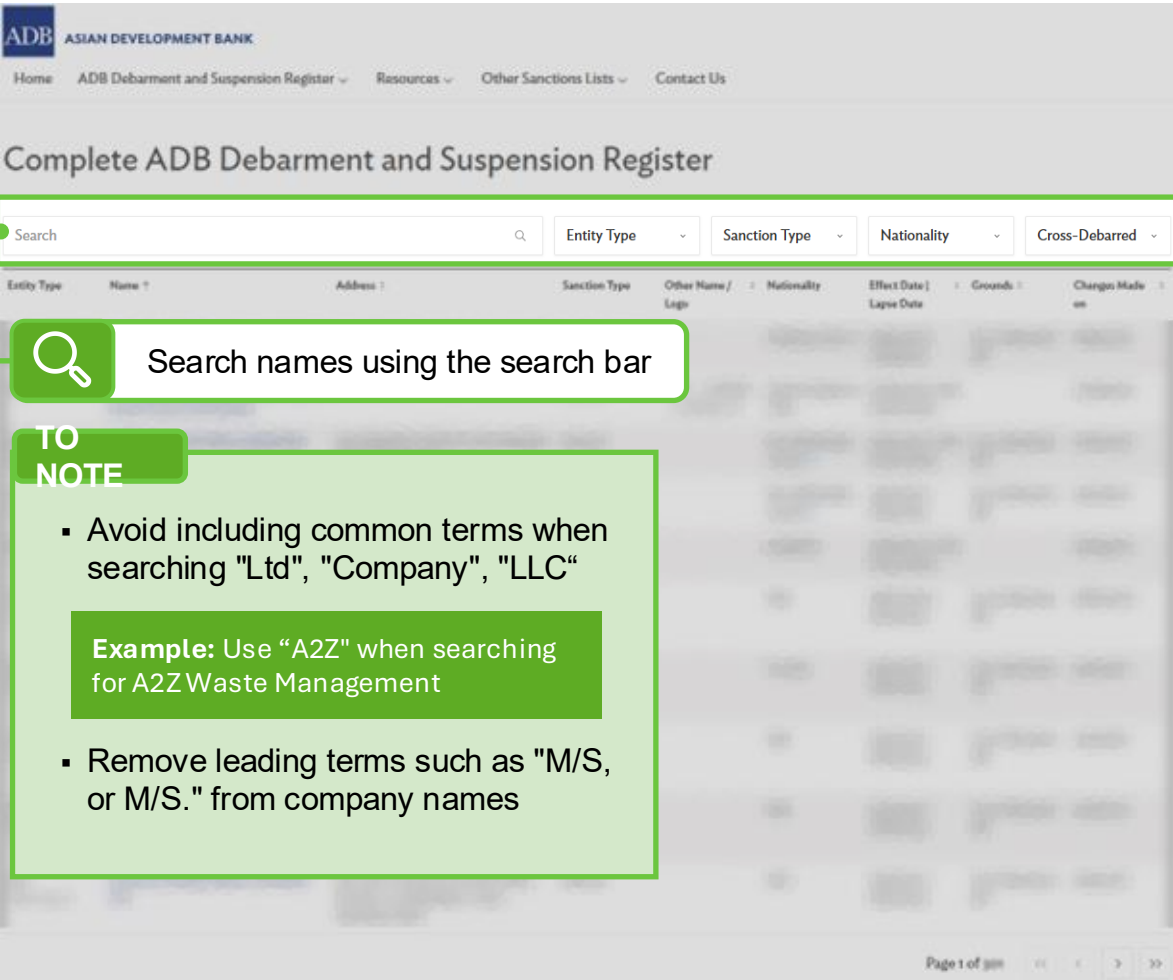
- Apply for access to Asian Development Bank full sanctions list:**
 - Your Name***: Fields for First name, Middle name, and Last name.
 - Email Address***: A single text input field.
 - Designation***: A dropdown menu with options like 'In-charge/Secretary / Project Officer'.
 - Organization / Agency***: A dropdown menu with options like 'In-Organization, Ministry, Department, etc.'.
 - Address***: A text input field.
 - Country***: A dropdown menu with the option 'Select a country'.
 - Telephone Number***: A text input field.
- In connection with this application, I confirm that I am involved in an ADB-financed, administered or supported activity in my capacity as:**
 - Designation for this project***: A dropdown menu with the option 'In-Project Director etc.'.
 - Project ID***: A text input field.
 - ADB Loan number(s)***: A text input field.
- Project is being executed/implemented by:**
 - Organization / Agency***: A dropdown menu.
- ADB Project Officer's contact information:** (This section is highlighted with a green box in the image)
 - Project Officer***: A text input field.
 - Project Officer's ADB Email***: A text input field.
 - Information on why access is required**: A text input field.

At the bottom of the form, there is a disclaimer: 'If granted access, I shall use the information in ADB Debarment and Suspension Register exclusively in connection with the project identified above. I shall protect the confidentiality of the information and use it only for the purpose for which the access has been granted.' Below this, there is a checkbox for 'Accept Terms'.

Make sure you fill in the name and email address of an ADB project officer who can verify your involvement in the project

SECTION 3

Debarment Checks



The screenshot shows the ADB Debarment and Suspension Register website. The search bar is highlighted with a green box, and a callout box with a magnifying glass icon points to it. The callout box contains the text: "Search names using the search bar". Below the callout box is a green box with the text: "TO NOTE".

TO NOTE

- Avoid including common terms when searching "Ltd", "Company", "LLC"

Example: Use "A2Z" when searching for A2Z Waste Management

- Remove leading terms such as "M/S, or M/S." from company names

SECTION 3

United Nations Security Council Sanctions: Obligations

This list is downloadable and searchable



United Nations | Security Council
EN ▾ × SEARCH

Search

United Nations Security Council Consolidated List

- Composition of the List
- Identifiers and acronyms in the List
- Individuals
- Entities
- Mailing list Subscription
- Search UN Security Council Consolidated Lists

United Nations Security Council Consolidated List

List in alphabetical order

PDF

List by Permanent Reference Number

The Consolidated List includes all individuals and entities subject to measures imposed by the Security Council. The inclusion of all names on one Consolidated List is to facilitate the implementation of the measures, and neither implies that all names are listed under one regime, nor that the criteria for listing specific names are the same. For each instance where the Security Council has decided to impose measures in response to a threat, a Security Council Committee manages the sanctions regime. Each sanctions committee established by the United Nations Security Council therefore publishes the names of individuals and entities listed in relation to that committee as well as information concerning the specific measures that apply to each listed name.

The current version of the Consolidated List is provided in .xml, .html and .pdf formats. Member States are obliged to implement the measures specific to each listed name as specified on the websites of the related sanctions committee.

For all comments and questions concerning all sanctions lists, including the United Nations Consolidated List, kindly contact the Secretariat via the email address: sc-sanctionslists@un.org.

04

Prevention and Integrity Due Diligence in Practice



SECTION 4

Prevention and Integrity Due Diligence in Practice

This session will cover:

How to prevent and identify integrity risks and carry out basic due diligence.

1. Why are prevention and integrity due diligence important.
2. What is a clear process for identifying and managing integrity risk.
3. How to carry out integrity due diligence searches and analysis.

SECTION 4

Defining Integrity Due Diligence

The process of **checking the accuracy of information** of a business or individual prior to, during, and after engaging in a contract and informs risk mitigation

SECTION 4

What information is assessed in IDD



Sanctions and debarment status



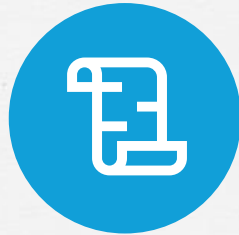
Beneficial ownership



Financial background and payment of contract



Competency of third party



Public records resources:
History of corruption and adverse news



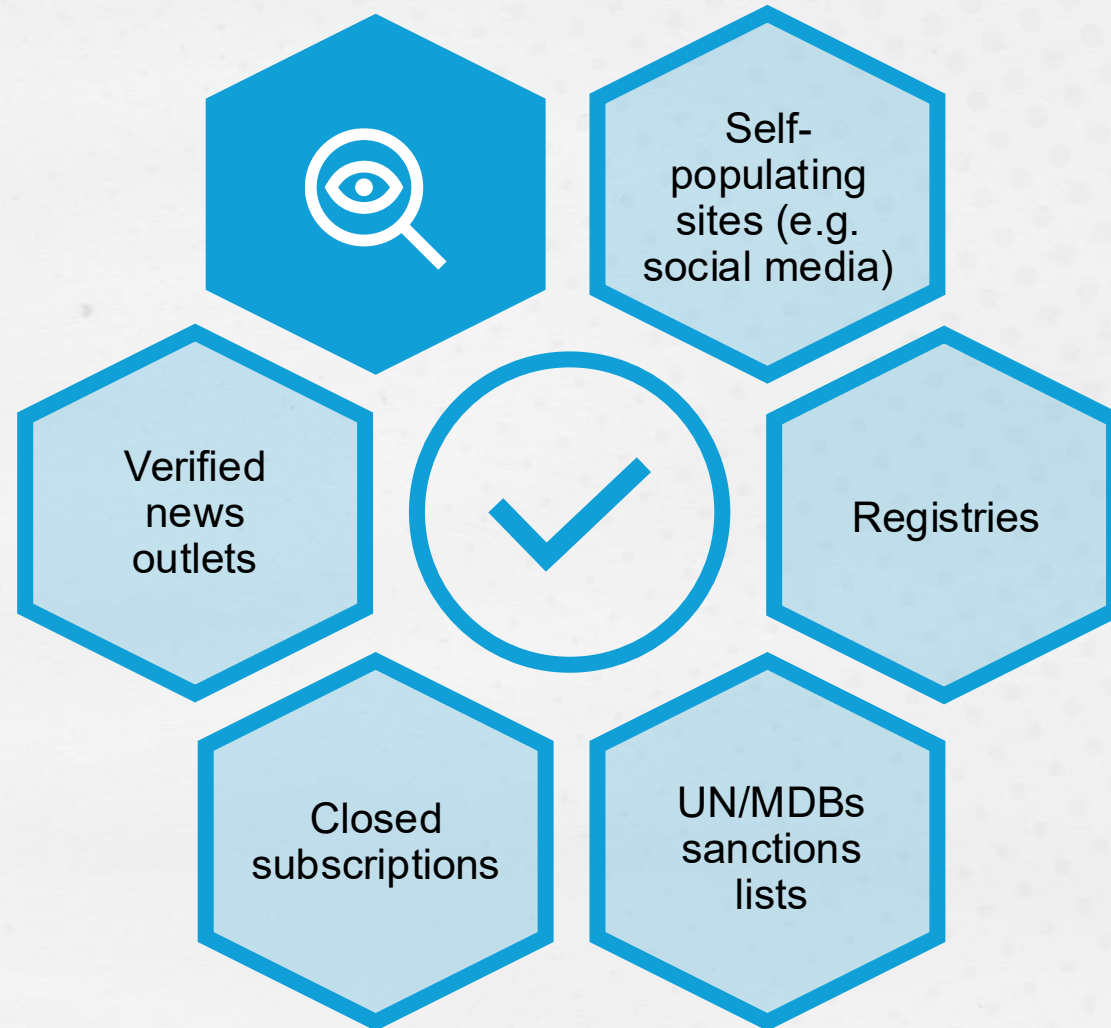
Reputation:
Commercial references



Approach to ethics and compliance

SECTION 4

Sources of Integrity Due Diligence Information



SECTION 5

Spotting Red Flags

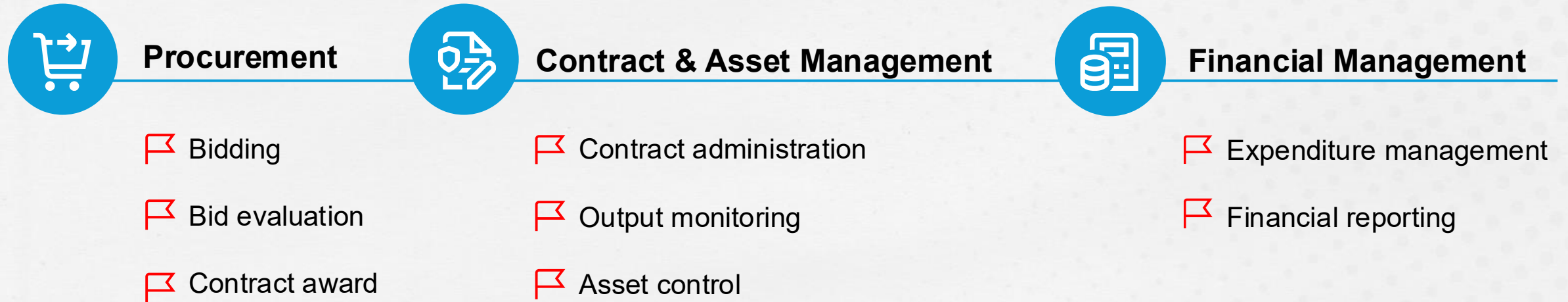
This session will cover:

What red flags look like in practice and how to notice them in everyday project work.

1. Where and when red flags commonly appear.
2. How to identify red flags linked to different types of integrity risk.
3. Understand how red flags may show up in your own work.

SECTION 5

Project Implementation Processes



These sub-processes reflect those assessed by OAI and do not necessarily reflect all sub-processes that exist within each process.

SECTION 5

Procurement



The following are illustrative examples only. Red flags are not definitive indicators of wrongdoing and should be assessed in context.

Bidding

Only one bid received

May indicate bid-rigging, pre-selection, or barriers that competition suppressed.

Identical or near-identical bid prices

Classic indicator of collusion—bidders may have agreed in advance who will win.

Specifications too vague or too narrow

Overly broad specs increase discretion; overly narrow ones may be tailored to favor one firm.

Bid Evaluation

Evaluation criteria changed after bids open

Post-submission changes undermine the integrity of the competition and may favor a particular bidder.

Winning bidder's qualifications unverifiable

Credential misrepresentation is common. Always cross-check CVs and company records independently.

Evaluator has undisclosed links to a bidder

Conflicts of interest must be declared. Recusal is the standard response; concealment is a red flag.

Contract Award

Scope expands significantly after award

May indicate the original bid was deliberately underpriced to win, with inflation planned for later.

Awarded firm on ADB Debarment Register

Automatic disqualifier. Debarment checks must be completed before award.

Award overrides panel recommendation

Not automatically wrong but must be clearly documented. Undocumented overrides are a red flag.

SECTION 5

Contract and Asset Management



The following are illustrative examples only. Red flags are not definitive indicators of wrongdoing and should be assessed in context.

Contract Administration

- Repeated contract variations**
Frequent or large variations without documented justification may indicate deliberate underpricing at bid stage.
- Changes approved without oversight**
Modifications to live contracts should go through the same rigor as the original award.
- Sanctioned firm still active on contract**
If a contractor becomes sanctioned during implementation, all contract modifications require OAI endorsement.

Output Monitoring

- Deliverables reported complete; site says otherwise**
Payment for undelivered work is one of the most common forms of project fraud. Independent site verification is essential.
- Monitoring reports copy-pasted across periods**
Verbatim repetition across reporting periods might suggest monitoring isn't actually happening.
- Contractor blocks site access**
Restricting monitoring access is itself a red flag and should be escalated.

Asset Control

- Assets missing from inventory**
Unaccounted-for project assets may indicate misappropriation. Regular physical checks are the primary control.
- Assets reassigned without authorisation**
Disposal or transfer of project assets should follow documented approval processes.
- No asset register maintained**
Absence of an asset register makes accountability impossible and increases misappropriation risk.

SECTION 5

Financial Management



The following are illustrative examples only. Red flags are not definitive indicators of wrongdoing and should be assessed in context.

Expenditure Management

- Payment requested before delivery**
Advance payments without contractual basis or delivery confirmation are a common fraud vector. Verify delivery independently before approving.
- Invoices from unverifiable firms**
Firms with no physical address, employees, or track record may be shell entities created to siphon funds.
- Payments split below approval thresholds**
Deliberate structuring to stay under oversight limits is a red flag. Look for patterns of near-identical amounts.
- Unexplained urgent payment requests**
Pressure to approve payments quickly, bypassing normal review, may indicate an attempt to avoid scrutiny.

Financial Reporting

- Discrepancies between reports and field data**
The gap between what is reported and what is observable on the ground is where misuse often hides.
- Audit findings repeated but unaddressed**
Persistent unresolved audit findings may suggest either incapacity or deliberate non-compliance.
- Access to financial records restricted**
Refusal to provide documentation to authorized reviewers is an immediate red flag.
- Project accounts commingled with other funds**
Mixing project funds with other accounts makes tracking impossible and may indicate intentional obfuscation.

SECTION 5

Conflict of Interest

Letter of Bid

NOTE

The bidder must

Bid Submission Sheet

NOTES

1. *The bidder must accomplish the Bid Submission Sheet on its letterhead clearly showing the bidder's complete name and address.*
2. *To be used for Single-Stage: One-Envelope Bidding Procedure.*

To: [insert c

Date:

International Competitive Bidding (ICB) No.:

We, the unders

Invitation for Bid (IFB) No.:

(a) We have

Alternative No.:

[Insert identification no. if this is an alternative bid; if alternative bid is not permitted, delete this field]

SECTION 4

Scenario discussion: What do you do next?



SECTION 4

Scenario discussion: What do you do next?

Scenario

A bidder or consultant appears on ADB's Debarment and Suspension Register or the UN Security Council Sanctions List.

What does this mean?

The firm or individual is not eligible to participate in an ADB-financed activity.

RESPONSE

The bid must be rejected due to the bidder's debarment status, and OAI should be notified if an ADB-debarred entity attempted to participate.

SECTION 4

Scenario discussion: What do you do next?

Scenario

Use of agents or intermediaries with unclear roles, fees, or value-add.

What does this mean?

Increased risk of kickbacks, facilitation payments, or hidden beneficiaries.

RESPONSE

Clarify roles of agents, scrutinize payments, and do more integrity due diligence on third parties

SECTION 4

Scenario discussion: What do you do next?

Scenario

A contractor is linked in adverse media to allegations of fraud, corruption, or collusion in a previous project, but is not listed on any sanctions lists.

What does this mean?

There may be elevated integrity risk, even if no formal sanction exists.

RESPONSE

Document the concern, assess credibility, and apply enhanced due diligence and monitoring measures.

SECTION 4

Scenario discussion: What do you do next?

Scenario

A project staff member has undisclosed personal, family, or business links to a bidding firm.

What does this mean?

Decisions may not be impartial, creating integrity and reputational risk.

RESPONSE

Require disclosure, manage the conflict appropriately, and adjust roles and supervision.

Session Wrap-Up

SESSION WRAP-UP

Recap



Know your partner



Leverage technology
for due diligence



Identify and mitigate risks,
support your partner in mitigating
risks



EAs/IAs to:

- Sign up for access to ADB's complete Debarment and Suspension Register
- Do the sanctions checks

SESSION WRAP-UP

References



OUR FRAMEWORK Policies and Strategies

ADB

ANTICORRUPTION

Asian Development Bank



INVESTIGATION AND ENFORCEMENT FRAMEWORK

OCTOBER 2024

ASIAN DEVELOPMENT BANK

ADB



Scan the QR code or visit bit.ly/ief-adb



Integrity Risks and Red Flags Series



Scan the QR code or visit bit.ly/ADBintegritylessons

SESSION WRAP-UP

Evaluation

Your feedback would help the Office of Anticorruption and Integrity in providing knowledge products and services relevant to you.

Answers will be kept confidential and data will only be assessed in the aggregate.

SCAN THE QR CODE



SESSION WRAP-UP

Connect with OAI.



www.adb.org/integrity



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ADB Anticorruption and Integrity



Report integrity violations:

<https://www.adb.org/integrity/report-violations>



If you registered your email address, you may receive a copy of this presentation and related resources from OAI.

Integrity is your responsibility, do not assume that someone else is doing it. Thank you for your commitment to integrity.

Together, we make a difference.