



The Integrity Learning Series

# ADB Sanctions – Debarments and Suspensions

24 November 2021 | 3:00 – 5:00 p.m. (Manila)



David Binns  
Advisor  
Office of Anticorruption and Integrity



Lisa Kelaart-Courtney  
Director, Prevention and Compliance  
Office of Anticorruption and Integrity



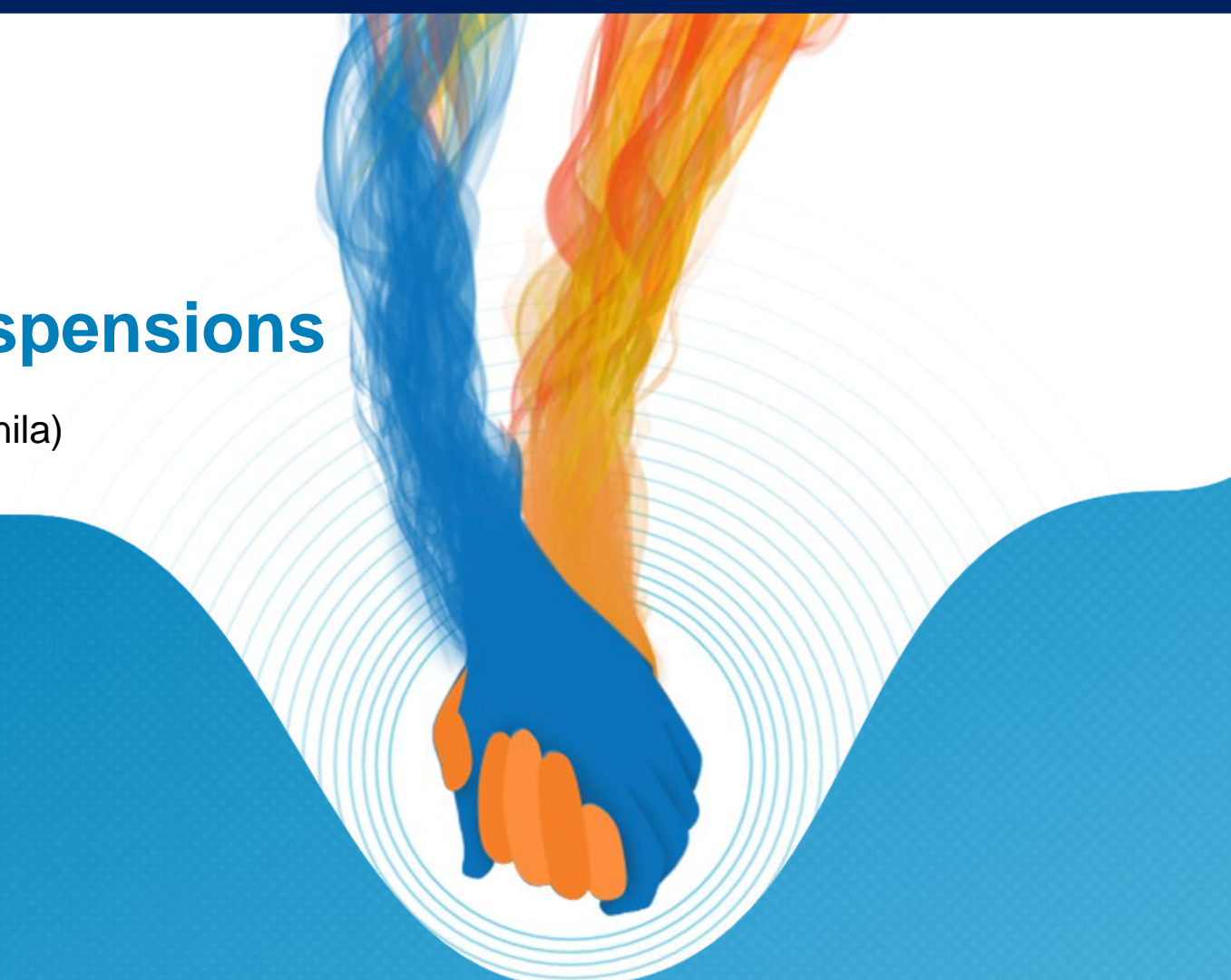
Jeff Taylor  
Director, Procurement Division 1  
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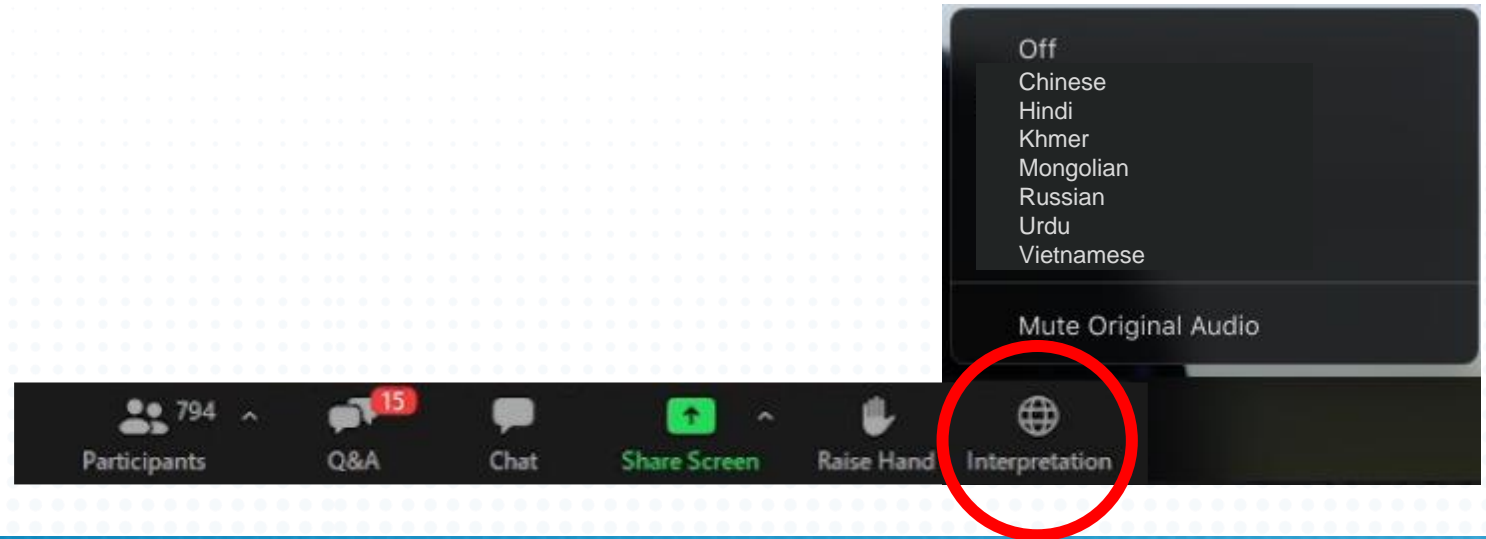
Rustam Abdukayumov  
Director, Procurement Division 2  
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# Reminders



Use the Interpretation panel for real time language interpretation

# Reminders



The session is  
being recorded



Type in your questions  
through Q&A at any time





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# Welcome Remarks



**John Versantvoort**  
Head  
Office of Anticorruption and Integrity



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# ADB Sanctions



**David Binns**

Advisor  
Office of Anticorruption and Integrity



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# How Does an Entity Become Debarred or Suspended by ADB?

1. Following an investigation by ADB
2. At the commencement of, or during, the investigation by ADB
3. Following an investigation by another MDB



# Following an ADB Investigation

1. ADB proposes a debarment, which is accepted by the entity
2. Via the Integrity Oversight Committee



firms and individuals  
currently debarred by ADB





# Following Another MDB Investigation



- ADB receives a notice from the MDB of the debarment which ADB enforces, otherwise known as a cross debarment



firms and individuals  
currently debarred by ADB



**Fraud**



**Corruption**



**Collusion**

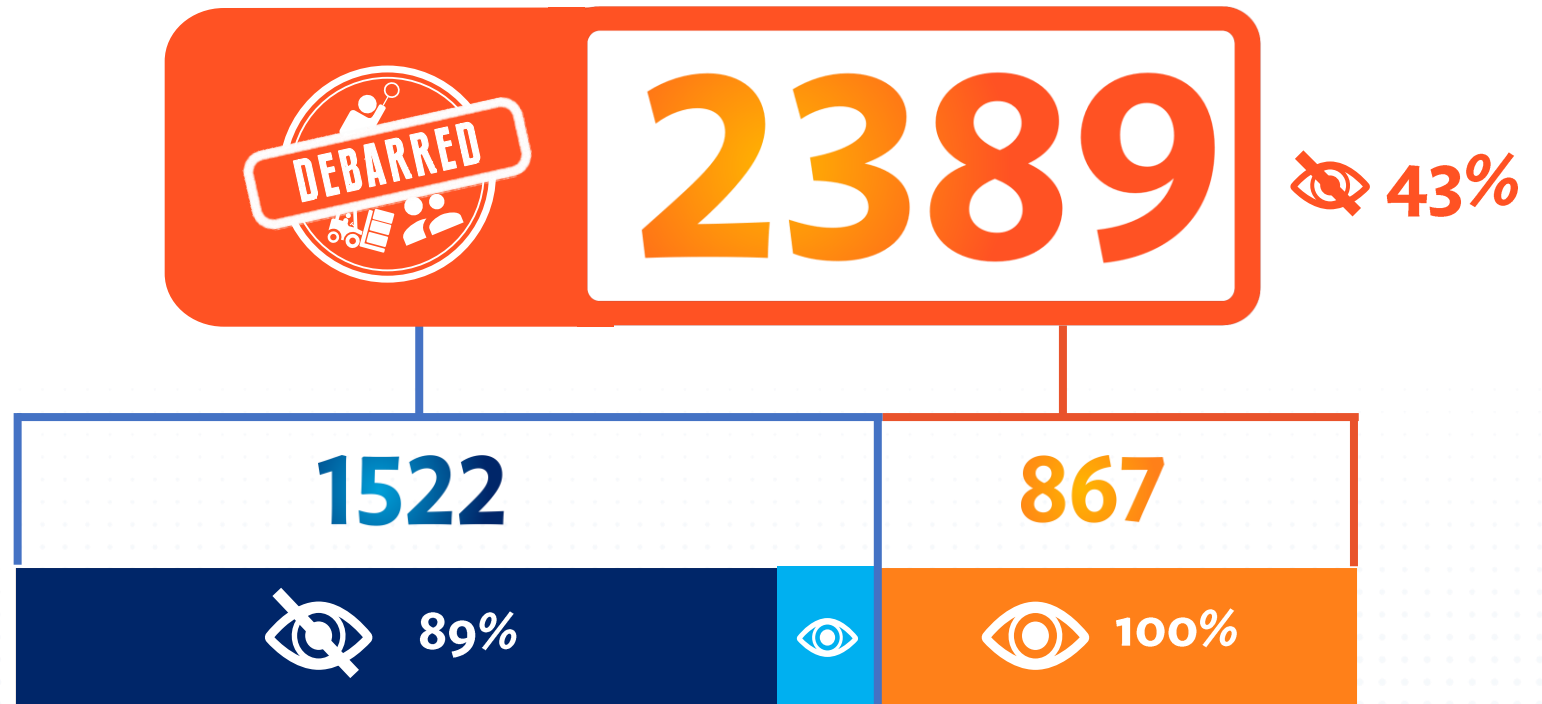


**Coercion**

# Consequences of a Debarment

To publish or not to publish:

1. ADB debarments are generally not published
2. Cross debarments are always published





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# EA/IA Responsibilities



**Jeff Taylor**

Director, Procurement Division 1  
Procurement, Portfolio, and  
Financial Management Department



**Rustam Abdukayumov**

Director, Procurement Division 2  
Procurement, Portfolio, and  
Financial Management Department



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# Why is sanction screening important?

## ADB's Procurement Policy

### VII. Integrity

10. ADB requires application of the highest standard of ethics during any procurement process subject to this Policy and use of funds, resources, assets, and authority in accordance with ADB's Anticorruption Policy and Integrity Principles and Guidelines (both as amended from time to time) (Anticorruption Guidelines).

## ADB's Procurement Regulations, paragraph 1.18 e)

- (e) A firm or individual sanctioned or temporarily suspended by ADB in accordance with ADB's Anticorruption Guidelines shall be ineligible to participate in or to be awarded an ADB-financed or ADB-administered contract or to benefit from an ADB-financed or ADB-administered contract, financially or otherwise, during the period of time determined by ADB.

**Financing agreement required EAs to comply with these eligibility requirements. They are reflected in all ADB's Standard Bidding Documents and Requests for Proposals and are applied to all stages of tendering process under ADB projects.**

# Executing agencies (EAs) are responsible for sanction screening

## Procurement of Goods and Works - Stages

Prequalification

Technical  
BER

Financial  
BER

Contract  
Award

Withdrawal  
Applications

Contract Variations/  
Modifications

## Procurement of Consulting Services

Shortlisting

Technical  
Proposals

Financial  
Proposals

Contract  
Award

Withdrawal  
Applications

Contract Variations/  
Modifications

# How should EAs undertake sanctions screening?

- Check bidders against the published UN Security Council Sanction List
- Request access to OAI's Sanction List and check against it
- Reflect the results of sanction screening in bid evaluation reports or recommendations for contract award (in case of direct contracting) submitted to ADB



# Special Considerations

- Under **post-review** (sampling), EA remains responsible for conducting sanctions screening at all stages of the procurement process before signing a contract
- For **non-sovereign operations**, ADB requires borrowers to demonstrate that procurement was transparent and preferably conducted through competitive bidding. EAs must confirm that the contracted entities are not on OAI sanction list.
- When ADB is participating in financing **PPP transactions**, entities on the ADB sanction list are not eligible to become project sponsors.

# Risks to EAs

- If an EA fails to conduct the required sanction screening at various stages before a contract is awarded, and a first-ranked bidder is found to be debarred or temporarily suspended by ADB, ADB will not issue its no objection to contract award recommendation.
- If an EA awarded and signed a contract with debarred or temporarily suspended (i.e. ineligible) entity, ADB will take appropriate action, including declaring misprocurement/noncompliance and canceling its financing.
- This represents reputational and contractual risk to EAs since contractors will demand payments. While contractors can terminate contracts if funding is not available but are still entitled to claim financing charges under “Delayed Payment” provisions.



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# Sanctions Screening: Lessons Learned and the 'How'



**Lisa Kelaart-Courtney**

Director, Prevention and Compliance  
Office of Anticorruption and Integrity



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# Sanctions Obligations

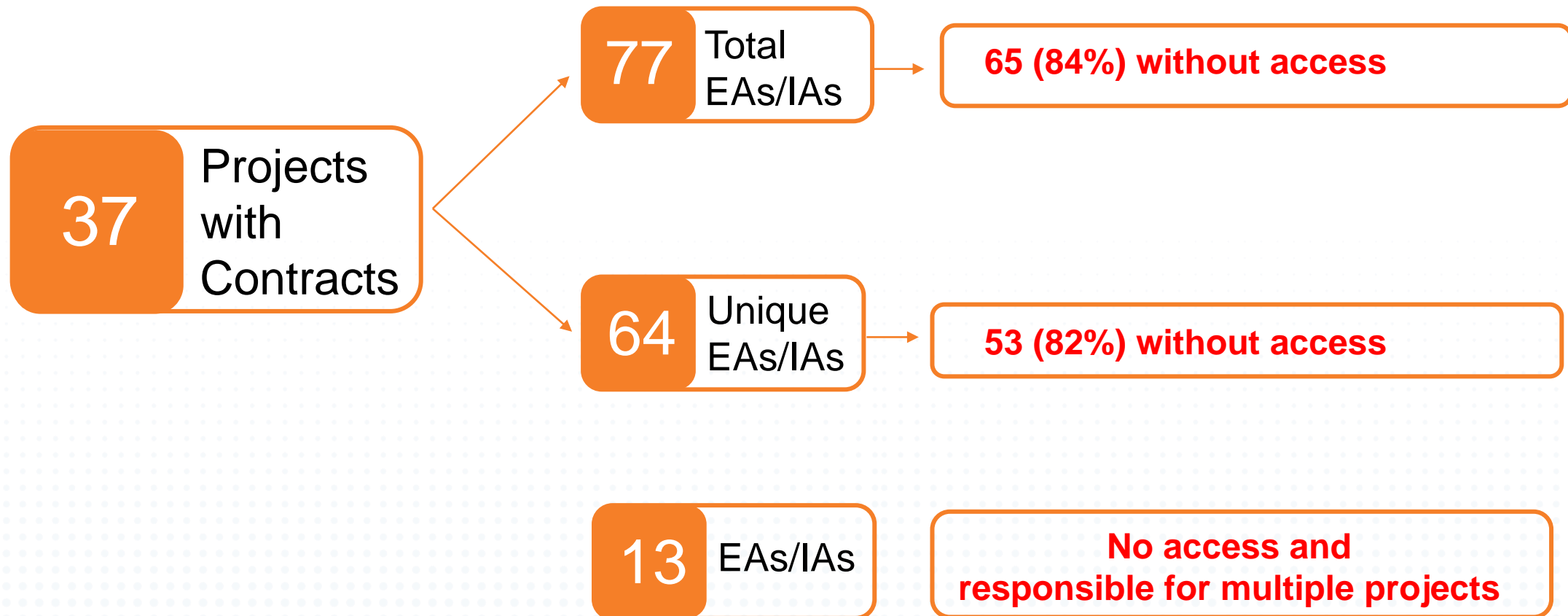


# Asian Development Bank Sanctions: Obligations



# OAI Thematic Review:






## EA and IA Access to ADB's Complete Sanctions List










# Escalations of Potential Violations: 2021 to Current

Potential debarment condition breaches detected and considered for investigation	<b>28</b>
--	-----------

Per sector		
	Agriculture, Natural Resources, and Rural Development (ANR)	<b>6</b>
	Education (EDU)	<b>3</b>
	Energy (ENE)	<b>1</b>
	Transport (TRA)	<b>12</b>
	Water and Other Urban Infrastructure Services (WUS)	<b>6</b>
Grand Total		<b>28</b>

Per region		
	Central and West Asia	<b>4</b>
	East Asia	<b>12</b>
	Pacific	<b>1</b>
	South Asia	<b>11</b>
	Southeast Asia	<b>0</b>
Grand Total		<b>28</b>

# EA and IA Access to ADB's Complete Sanctions List

## Sanctions List

The following page lists the entities sanctioned by the Asian Development Bank (ADB) and also those cross-debarred by all other Multilateral Development Banks (MDBs). These entities are not eligible to participate in ADB-financed, -administered, or -supported activities for violating the specified Anticorruption Policy.

### COMPLETE LIST

### PUBLISHED LIST Accessible to the public

#### Published List (No Login Required)

What you will see in the list:

- Sanctions violation while ineligible
- Second and subsequent violations
- Debarred entities who are uncontactable
- Cross debarred entities
- Subset of the complete list

[VIEW PUBLISHED LIST](#)

#### Complete List (For authorized users only\*)

What you will see in the list:

- Published List
- First violations

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

[VIEW COMPLETE LIST](#)

Password-protected, accessible to:

- ADB Staff
- BoD
- Parties with a “need to know”: international organizations, bilateral and government partners
- EAs and IAs

# Requesting Access

## Sanctions List

The following page lists the entities sanctioned by the Asian Development Bank (ADB) and also those cross-debarred by ADB from other Multilateral Development Banks (MDBs). These entities are not eligible to participate in ADB-financed, -administered, or -supported activities for violating the specified Anticorruption Policy.

### Published List *(No Login Required)*

What you will see in the list:

- Sanctions violation while ineligible
- Second and subsequent violations
- Debarred entities who are uncontactable
- Cross debarred entities
- Subset of the complete list

[VIEW PUBLISHED LIST](#)

### Complete List *(For authorized users only\*)*

What you will see in the list:

- Published List
- First violations

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

Are you a registered user?

[LOGIN](#)

Are you a qualified (non-ADB staff) user who needs access to the complete sanctions list?

[SIGN-UP](#)

#### Qualified users:

- Officially involved in an ADB-financed, -administered or -supported activity (e.g. Project Director, Deputy Project Director)
- Favorably endorsed by ADB Project Officer

If you have problems submitting the online application, please download the [Application Form](#), complete it and email to [integrity@adb.org](mailto:integrity@adb.org)

**Sign up here**

**Manual form  
available**

<http://sanctions.adb.org>



# Requesting Access

## Apply for access to Asian Development Bank full sanctions list:

\* - required fields

Your Name *	<input type="text"/>	<input type="text"/>	<input type="text"/>
	<i>First Name</i>	<i>Middle Name</i>	<i>Last Name</i>
User Name / Password *	<input type="text"/>	<input type="text"/>	<input type="text"/>
	<i>User Name</i>	<i>Password</i>	<i>Confirm Password</i>
Designation *	<input type="text"/>		
<i>(i.e. Deputy Secretary / Proj Officer)</i>			
Organization / Agency *	<input type="text"/>		
<i>(i.e. name of Organization, Ministry, Employer, etc)</i>			
Address *	<input type="text"/>		
Country *	<input type="text"/>		
Telephone Number *	<input type="text"/>		
Fax Number	<input type="text"/>		
Email Address *	<input type="text"/>		

### In connection with this application, I confirm that:

**I am involved in an ADB-financed, administered or supported activity in my capacity as:**

Designation *	<input type="text"/>
<i>(i.e. Project Director etc)</i>	
Project(s) *	<input type="text"/>
ADB Loan number(s) *	<input type="text"/>

### Project is being executed/implemented by:

Organization / Agency *	<input type="text"/>
-------------------------	----------------------

### ADB Project Officer's contact information:

Project Officer *	<input type="text"/>
Officer's ADB Email *	<input type="text" value="@adb.org"/>
Information on why access is required	<input type="text"/>

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

If granted access, I shall use the information in ADB Sanctions List 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.

The information will be granted without prejudice to the privileges and immunities conferred on ADB and its officers and

# Requesting Access

Your registration has been successfully submitted. You will receive an email after the approval process. Thank You.

[Back to Home Page](#)

# Managing the Access

IAs and EAs should

- Designate the appropriate person(s) from the organization/agency requiring access on a 'need-to-know' basis
- Not share user accounts or passwords – each user must apply for a unique user ID.
- Submit accurate, detailed information that allows the user ID to be identifiable to a single user
- Inform ADB ([integrity@adb.org](mailto:integrity@adb.org)) or ADB project officer if the user profile details have changed since the initial request or require deactivation (access no longer required or user no longer connected with the EA)



# Searches

Search: viet nam

GO

TIP: Use the \* for better search results. Type \*example\* to list all entities containing the text 'example' anywhere in the line.

33 documents for query "viet nam"

Page: 1 | 2

Name	Address	Sanction Type	Other Name/Logo	Effect Date   Lapse Date	Grounds
Viet Nam Industrial Commercial Investment and Development Joint Stock Company (Short name: Viet Nam Indetra Co., JSC)	No. 10, Cluster 17, Mai Dich Ward, Cau Giay District, Hanoi, VIET NAM  41 Nguyen Trung Ngan, Vinh City, Nghe An, VIET NAM	Debarred	Công ty cổ phần đầu tư thủy lợi và phát triển công nghiệp Việt Nam	16/Sep/2021   16/Mar/2025	Violated ADB's Integrity Principles and Guidelines 2A (ii).
Hoang Mai Construction Import and Export Joint Stock Company (Trade Register No.: 0103774823)	Xom Bo, Commune Thanh Liet, District Thanh Tri, Hanoi VIET NAM  Room 3016, Building B, Vinaconex Building Nguyen Xien (Phòng 3016 Tòa B Vinaconex 2 Nguyễn Xiển) Đại Kim Ward, Hoang Mai District (Phường Đại Kim, Quận Hoàng Mai) Hanoi 100000 (Hà Nội) VIET NAM  No. 14, TT6B Urban West Nam Linh Dam, Hoang Mai (Số 14, TT6B Khu đô thị Tây Nam Linh Đàm, Hoàng Mai) Hanoi 100000 (Hà Nội) VIET NAM	Debarred	Công ty CP xuất nhập khẩu xây dựng Hoàng Mai	17/Feb/2021   17/Aug/2025	Violated ADB's Integrity Principles and Guidelines 2.A(ii)

# Search Functionality

## Complete Sanctions List

Search: A2Z

GO

TIP: Use the \* for better search results. Type \*example\* to list all entities containing the text 'example' anywhere in the line.

Category: FIRMS INDIVIDUALS ALL ENTRIES

View by: Name Latest Update Cross Debarment Effectivity Nationality Cross-debarred Entities Sanction Type

Filter by: All A B C D E F G H I J K L M N O P Q R S T U V W X Y Z



Search names using the search bar



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

# Searches

Search: A2Z

TIP: Use the \* for better search results. Type \*example\* to list all entities containing the text 'example' anywhere in the

14 documents for query "A2Z"

Name	Address	Sanction Type	Other Name/Logo	Nationality	Effect Date   Lapse Date	Grounds
A2Z WASTE MANAGEMENT (LUDHIANA) LTD.	PLOT NO. B. 38, INSTITUTIONAL AREA, SECTOR -32, GURUGRAM- 122001, HARYANA, INDIA	Debarred		India	23/Jun/2021   11/Nov/2024	Cross-Debarment: WB
A2Z WASTE MANAGEMENT (ALIGARH) LTD.	PLOT NO. B. 38, INSTITUTIONAL AREA, SECTOR -32, GURUGRAM- 122001, HARYANA, INDIA	Debarred		India	23/Jun/2021   11/Nov/2024	Cross-Debarment: WB
A2Z INFRASERVICES LTD.	O-116, 1ST FLOOR, DLF SHOPPING MALL, ARJUN MARG, DLF PH-I GURUGRAM - 122002, HARYANA, INDIA	Debarred		India	23/Jun/2021   11/Nov/2024	Cross-Debarment: WB
A2Z POWERCOM LTD.	O-116, 1ST FLOOR, DLF SHOPPING MALL, ARJUN MARG, DLF PH-I GURUGRAM - 122002, HARYANA, INDIA	Debarred		India	23/Jun/2021   11/Nov/2024	Cross-Debarment: WB
RISHIKESH WASTE MANAGEMENT LTD. (FORMERLY KNOWN AS A2Z POWERTECH LTD.)	O-116, 1ST FLOOR, DLF SHOPPING MALL, ARJUN MARG, DLF PH-I GURUGRAM - 122002, HARYANA, INDIA	Debarred		India	23/Jun/2021   11/Nov/2024	Cross-Debarment: WB
A2Z INFRASERVICES LANKA PVT. LTD.	BOC MERCHANT TOWER, LEVEL 8, NO: 28 ST. MICHAEL'S ROAD, COLOMBO 3, SRI LANKA	Debarred		Sri Lanka	23/Jun/2021   11/Nov/2024	Cross-Debarment: WB
A2Z INFRA ENGINEERING LIMITED(Previously known as A2Z Maintenance & Engineering Services Limited)	PLOT NO. B-38, SECTOR 32, INSTITUTIONAL AREA, GURGAON - 122001, HARYANA INDIA	Debarred		India	8/Dec/2020   11/Nov/2024	Cross-Debarment: WB
A2Z WASTE MANAGEMENT (NAINITAL) PRIVATE LIMITED	PLOT NO. B-38 INSTITUTIONAL AREA, SECTOR 32, GURGAON, 122001, HARYANA, INDIA	Debarred		India	23/Jun/2021   11/Nov/2024	Cross-Debarment: WB

# Searches

AARON INGENIEROS CONSTRUCTORES & CONSULTORES E.I.R.L.*	JR. CHAUPIMAYO D-5 SANTA ANA – LA CONVENCIÓN, CUSCO Peru	Debarred	Non ADB Member Country 🇵🇪		Cross- Debarment: WB
Abdellatif, Cherkaoui	Nº3012 Av des Far Lachalé Dcheira Inezgane Morocco	Debarred	Non ADB Member Country 🇲🇦	21/Sep/2020   19/May/2023	Cross- Debarment: EBRD



# United Nations Security Council Sanctions: Obligations



# United Nations Security Council Sanctions

🏠 Welcome to the United Nations

عربي 中文 English Français Русский Español

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Sanctions

Members

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Home » About the Council » United Nations Security Council Consolidated List

## United Nations Security Council Consolidated List

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- [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

Search function



# UNSC Sanctions: Search

## United Nations Security Council Consolidated List Search

### Language

☐ العربية

☐ 中文

☒ English

☐ Français

☐ Русский

☐ Español

Select the language of the report

### FULL TEXT SEARCH

#### Enter keywords

A

You can enter more than one word to search separated by space.

For example:

case 1: if you enter **John Doe** the results shown will consist of individuals or entities that contain the word "John" or "Doe". If you are searching for an exact phrase include it between quotes "your phrase here". **The field is not**

**mandatory when Advanced search options are used.**

For best results search words entered must be at least 3 characters long.

Search

reset

For Advanced search options [click here](#)

# UNSC Sanctions: Advanced Search

## FULL TEXT SEARCH

Enter keywords

A

You can enter more than one word to search separated by space.

*For example:*

case 1: if you enter **John Doe** the results shown will consist of individuals or entities that contain the word "John" or "Doe". If you are searching for an exact phrase include it between quotes "your phrase here". **The field is not mandatory when Advanced search options are used.**

For best results search words entered must be at least 3 characters long.

Exclude

B

You can enter more than one word to exclude separated by space.

*For example:*

case 2: if the keywords entered in **A** are **John Doe** and you want to exclude all individuals or entities that contain "1987" from the search results of **A** then you would enter **1987** in **B**. Therefore the search results will show all the entries with John Doe that do not have 1987 (John Doe born in 1987 will be excluded).

Case 3: if you want to exclude individuals or entities that contain the word **Taliban** then you would leave **A** blank and enter **Taliban** in **B** (All entries that have the word Taliban will be excluded). If you want to exclude a phrase put it between quotes "your phrase". **The field is not mandatory.**

Date of Birth

FROM: Year  Month  Day  TO: Year  Month  Day

Choose only a year (e.g. **FROM 1987 TO 1990**) or a full date (e.g. **FROM 1987-01-01 TO 1990-01-01**).

Another case would be **FROM 1987 TO 1990-01-01** or **FROM 1987-01-01 TO 1990**.

If **TO** is completely blank then only **FROM** date will be selected. **The field is not mandatory.**



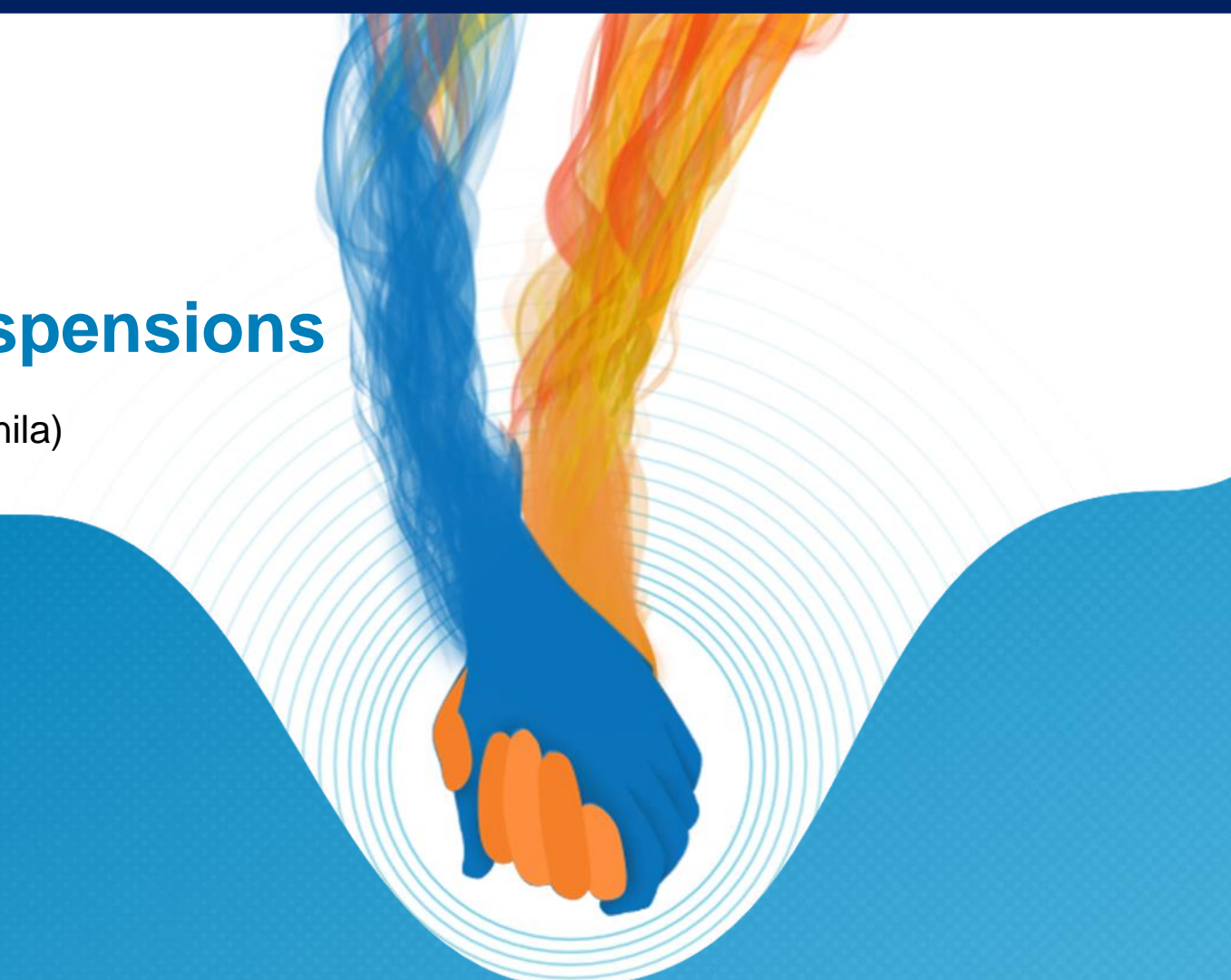


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# Q&A



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**David Binns**

Advisor and OIC, Investigations Division  
Office of Anticorruption and Integrity  
Asian Development Bank (ADB)

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Procurement, Portfolio, and Financial  
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Procurement, Portfolio, and Financial  
Management Department  
Asian Development Bank (ADB)



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Scan

## Survey QR Code

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.

# Office of Anticorruption and Integrity



[www.adb.org/integrity](http://www.adb.org/integrity)



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ADB Anticorruption and Integrity



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Due to the COVID-19 pandemic, please reach out to OAI via email. Report integrity violations through OAI's complaint form:

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

