



Office of Anticorruption and Integrity

The Integrity Learning Series

Georgia: Anticorruption and Integrity Training

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Senior Integrity Officer

11 September 2025
Hybrid Session

Reminders



The session is
being recorded.



Reserve
questions at the
end of the
presentation.



Please remain
on mute if not
speaking.



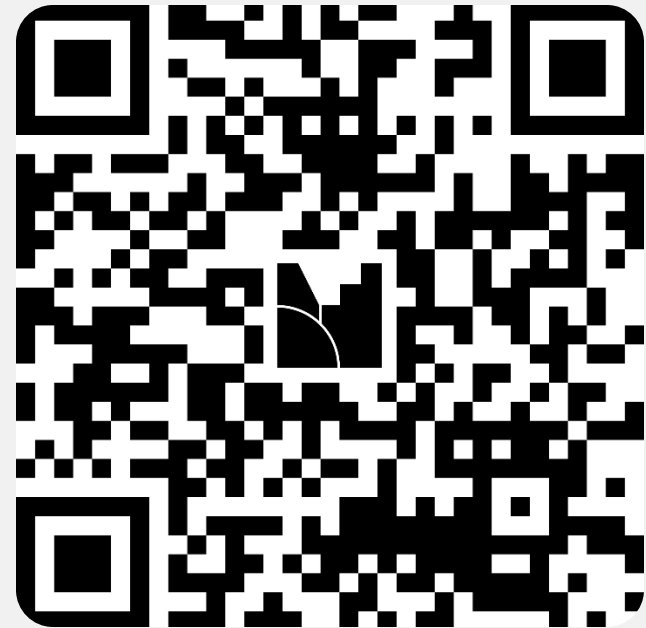
For Mentimeter,
scan the QR
Code or type
menti.com.

Case Study 1:

You find a wallet on the street. It has the owner's ID and \$1,000. What would you do?

Would you:

1. Keep the money: “Finders keepers!”
2. Turn in the wallet intact to the Lost and Found counter.
3. Contact the owner using the ID to return the wallet.



Scan the QR Code or go to menti.com
and enter code **4860 6489**

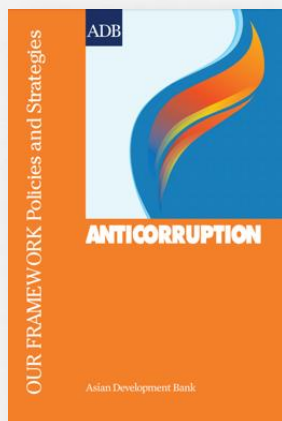
What to expect

- I. ADB's Anticorruption and Integrity Framework
- II. Integrity Violations
- III. Enforcement Actions and Impact
- IV. Recognizing and Reducing Risks

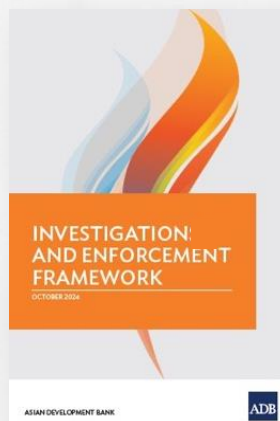
I. ADB's Anticorruption and Integrity Framework

ADB's Anticorruption and Integrity Framework

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



<https://www.adb.org/documents/anticorruption-policy>



<https://www.adb.org/documents/investigation-enforcement-framework>



II. Integrity Violations

Quiz



Scan to participate

Or go to **menti.com**
and enter code
4860 6489



Rural Roads Rehabilitation Project

Project Director

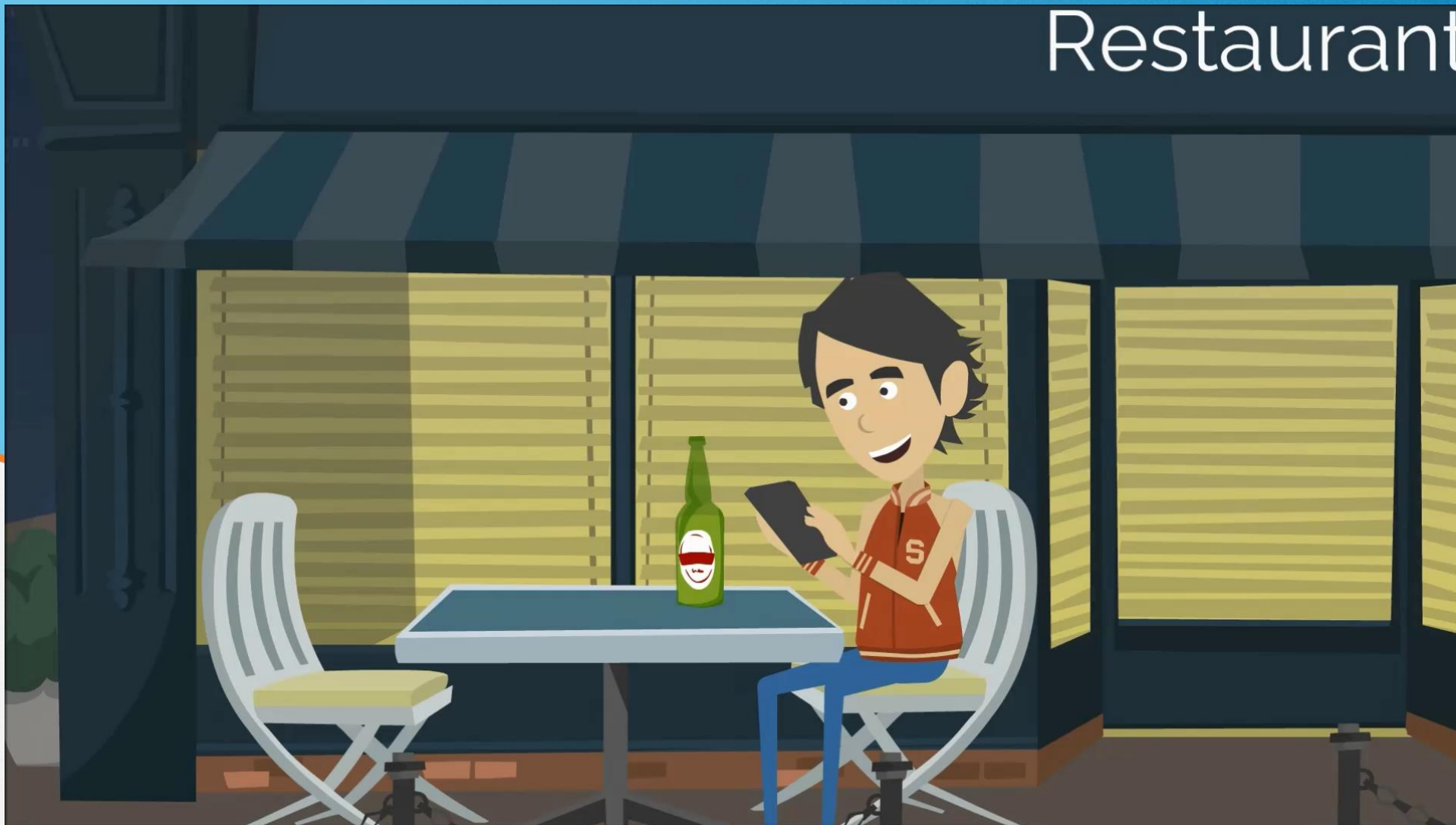


ADB Irrigation and Water Project **BIDDING IS NOW OPEN**





Restaurant



Invitation For Bids

Bidding Announcement



Contract No. and Title:
ICB No-XA/EA/1A/C2

We hope you all had a nice holiday season and a big congrats to all of our single Irish American women. Thank you all once again for making it such a successful event and a lot of fun to be a part of the all star staff. We need the your next chance to do big with some smiling good people!

New Thermal Pattern
We have some exciting updates that we wanted to make sure that you were aware of. The first one I will go over is the new and highly anticipated thermal pattern. Now, you can easily download your thermal and upload them

New Discount Prices
We have some exciting updates that we wanted to explain that you guys might see that the first one I will go over is the new and highly anticipated discount program! Now you can really discount your creation and spread them around. Here are the

We hope you all had a nice holiday season and a big congrats to all of our likeable folk! However, we are not done yet. Thank you all once again for making it such a successful season and a lot of fun to be a part of. We all the staff bring thank for your great chance to who big with some exciting great stuff!

of letters you have selected the values you would like to download, underneath it, you will see a large orange button that says "Download this selection". This is the button you will want to click. There is a fee for this feature and it does depend on the length of the video. However, the first download is automatically 100% off and subsequent downloads are only 50% off the next download. Let us offer the first to you! That's the beauty of CREATING quality. The video is now \$5.99 (reg. \$12.99). 100% off is \$0.00! Help a 2000+ person with the quality on DVD (4100hrs, 17000hrs, more) in other words... it's very



Collusion



MDB-Harmonized Definitions



Fraud



Corruption



Collusion



Coercion



Failure to disclose
and manage a
conflict of interest



Abuse



Obstruction



Retaliation Against
Whistleblowers
or Witnesses



**Violation of
Debarment**



Failure to Adhere to
the Highest Ethical
Standards

III. Enforcement Actions and Impact

- Consequences of Integrity Violations in ADB-supported Projects
- Enforcement and Disclosure Actions
- Impact While Under Debarment

Consequences of Integrity Violations in ADB-financed Projects



Debarment of firms and individuals



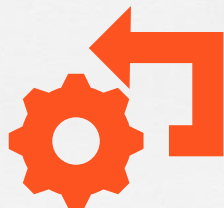
Suspension of the loan or grant allocations



Termination of loan or grant allocations



Return of misused loan or grant resources back to ADB



Changes of **administrative arrangements**



Request to **investigate or change** government staff



Cross debarment



Enforcement and Disclosure Actions



Debarment



Debarment
with conditional reinstatement



Conditional Non-
Debarment



Reprimand



Restitution and / other
financial remedies

ADB Debarment and Suspension Register

 <http://sanctions.adb.org>

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.

PUBLISHED LIST

Accessible to the public

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:

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- 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](#)

[Contract](#)

COMPLETE LIST

Password-protected, accessible to:

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

Impact While Under Debarment

Current
contacts



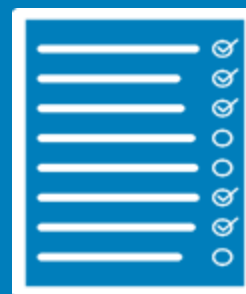
**MAY
CONTINUE**

Contract
variations



**OAI
ENDORSEMENT**

Future tenders



NOT PERMITTED

Reinstatement



NOT AUTOMATIC

IV. Recognizing and Reducing Integrity Risk

- **Red Flags**
- Due Diligence

What is Integrity Risk?



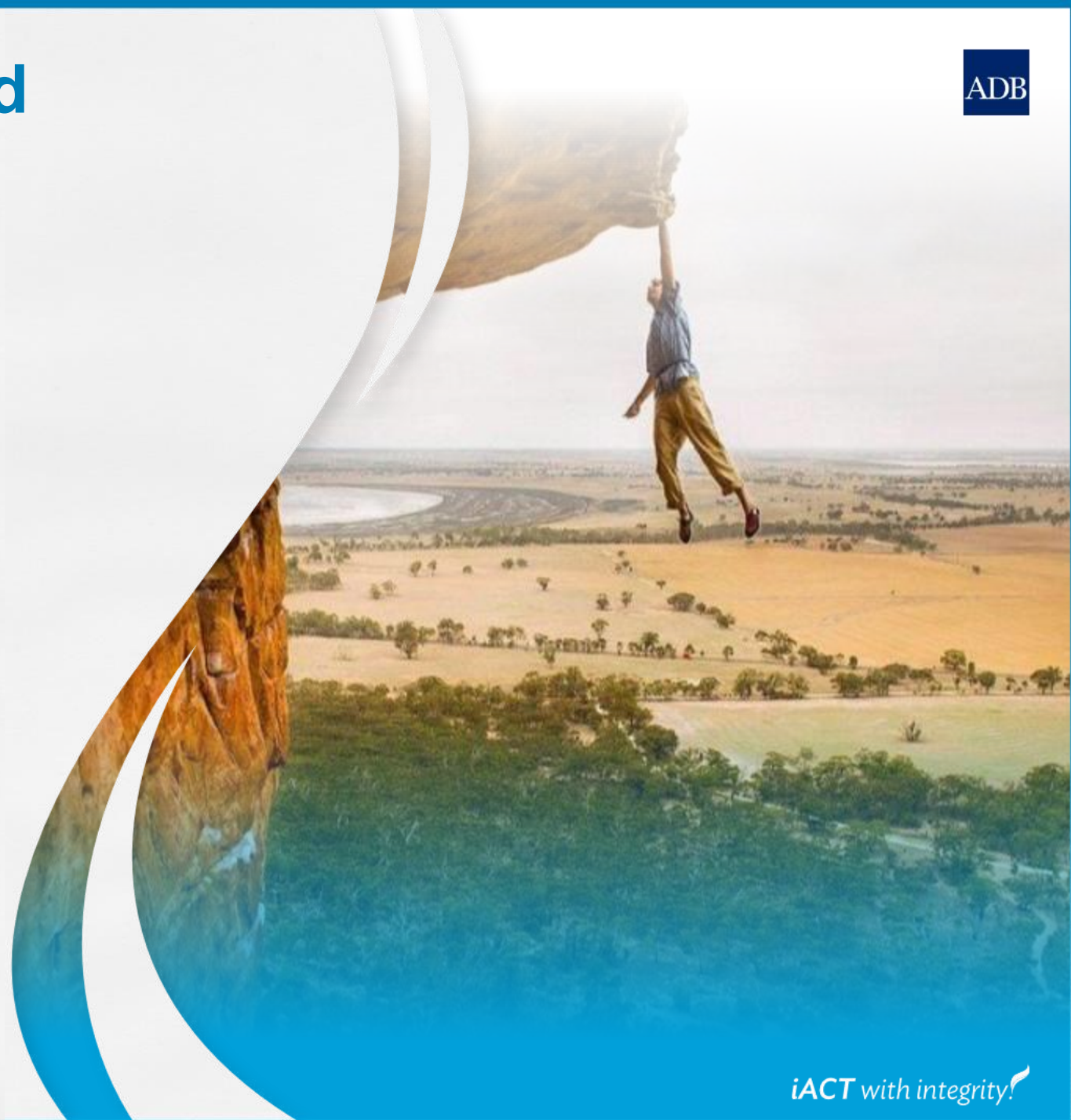
Integrity Risk

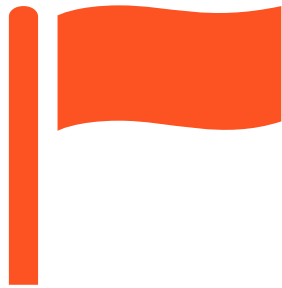
is the risk that a person or entity involved in ADB activities is implicated in financial or other ethical misconduct, resulting in potential adverse impacts on ADB.



How is Integrity Risk related to Reputational Risk?

- ADB and its partners rely on a strong reputation to fulfill their development mandate
- Reputational risk arises when stakeholders or communities lose confidence in ADB's integrity and effectiveness
- Association with individuals involved in financial or ethical misconduct—even outside ADB activities—can harm our reputation











Be alert to the
red flags of
integrity risks.

Project Implementation Processes



Procurement

-  **Bidding**
Prequalification; bidding documents preparation; and bid advertisement, submission, and opening
-  **Bid evaluation**
Assessment of bidders' compliance with bidding requirements, and preparation and approval of evaluation report
-  **Contract award**
Post-bid evaluation activities until contract is awarded and signed

Contract & Asset Management

-  **Contract administration**
The management of the day-to-day practicalities and administrative requirements under the contract
-  **Output monitoring**
Engagement with/supervision of contractors, consultants, and suppliers in relation to project outputs
-  **Asset control**
Safeguarding and maintenance of project assets including asset inventory


Financial Management

-  **Expenditure management**
Approval and processing of payments for project expenditures
-  **Financial reporting**
Project accounting and auditing


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

Red Flags in Bidding


Ineligible bidders

In a rebidding, the bid evaluation committee decided that three suppliers were substantially responsive to the bidding requirements. 

However, ADB had **debarred** two of these suppliers. 

The remaining supplier (i) appeared to be **related** to the two debarred suppliers, (ii) purchased bidding documents on the day of the bid submission deadline, and (iii) submitted a bid to create an illusion of competition. 

Leakage of Confidential Information

Negotiations between the project management unit and the supplier were initiated 2 months before quotations from other suppliers were sought. 

Red Flags in Bid Evaluation

Financial Capacity



Outdated financial statements were submitted to support bidder's financial capacity.

Financial statements from different years have identical data.




Value of a bidder's cash and cash equivalents declared in the bidding form was higher than the value in the submitted audited financial statements.



Unaudited financial statements were accepted without first confirming whether the laws in the bidders' countries or jurisdictions required audited statements.



Unsupported credit lines.
Different bidders having identical credit lines. 

Red Flags in Bid Evaluation

Pending Litigation



Bidder did not disclose its pending litigation as indicated in the notes to the financial statements. ⚠

Personnel



Using personnel from debarred entities.
More on the next slide... ⚠

Fake CVs or credentials



Case Study 2

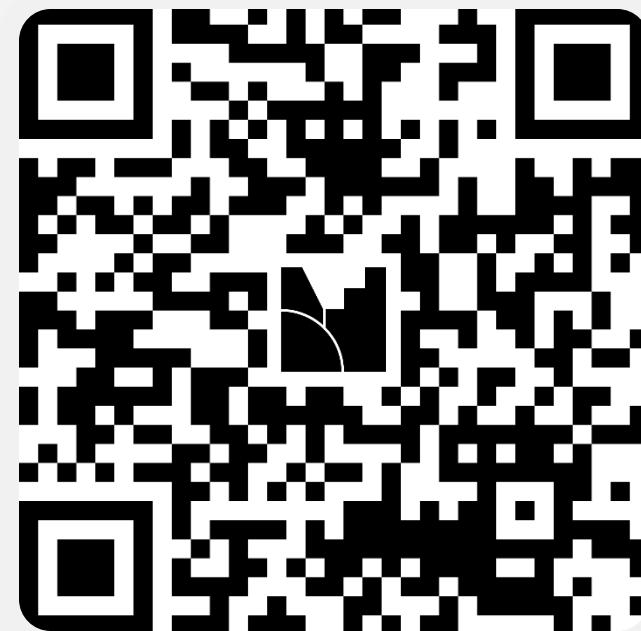
- A government agency recently advertised an invitation to bid for an ADB-financed construction of a hydroelectric dam.
- The head of the bid evaluation committee accompanied one of the potential bidders to visit the site where the dam will be constructed.
- This site visit was not announced beforehand. In addition, the site visit and the discussions were not recorded, nor were they shared with other potential bidders.



Case Study 2 (Continuation)

Which of these are red flags of Collusive Practice?
Select the best answer.

1. A site visit was conducted without prior announcement by the bid evaluation committee.
2. The site visit and discussions made during the site visit were not recorded.
3. The site visit and discussions made during the site visit were not shared with other potential bidders.
4. All of the above.
5. None of the above.



Scan the QR Code or go to
menti.com and enter code **4860 6489**

IV. Recognizing and Reducing Risk

- Red Flags
- **Due Diligence**



WHY?



WHO?



WHEN?



WHAT?

Factors in Conducting Due Diligence



Beneficial ownership



Financial background
and payment of contract



Competency of third party



Public records resources:
History of corruption
and adverse news



Reputation:
Commercial references

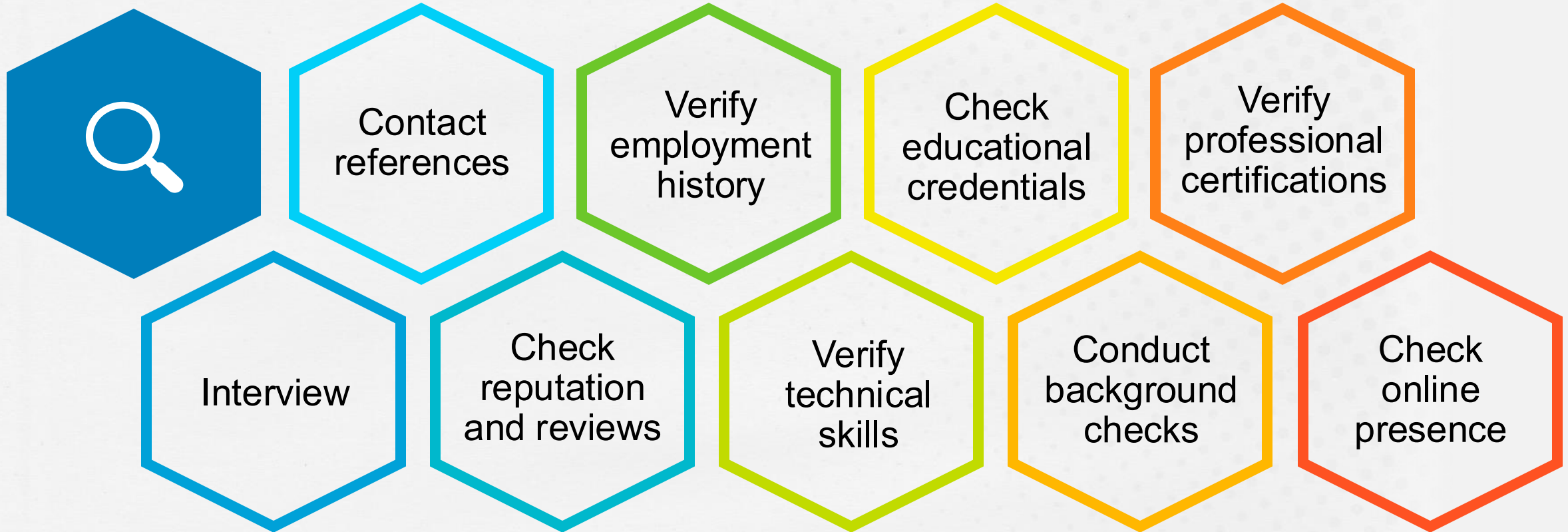


Approach to ethics
and compliance

Due Diligence: Sources



Conduct Due Diligence



Potential Risk Flags



Bribery, corruption



Fraud, embezzlement



Money laundering, terrorist financing



Criminal convictions



Illegal or disreputable activities



Use:

Specific Keywords

Jonathan vs Jonathan **Georgia engineer**

And

“road construction” **AND** “environmental impact”

Quotation Marks

“Georgia water project”

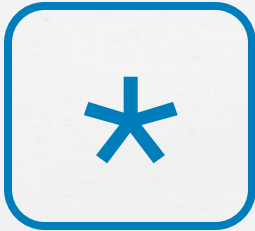
Or

education **OR** training

Minus Operator (-)

“bridge construction projects” **-** “toll bridges”

More Search Techniques



Asterisk (*)
as a wildcard



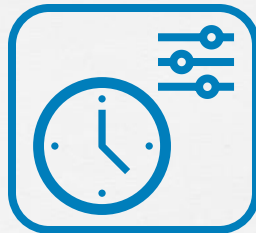
Site-specific
searches



Advanced
search options



Related
searches



Time filters



Google Scholar



Reverse image
search

Debarment and Suspension Checks

 <http://sanctions.adb.org>

ADB Debarment and Suspension Register

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Other Information

[Application](#) ▾

[Temporary Suspension](#) ▾

[Debarment](#)

[Contract](#)

COMPLETE LIST

Password-protected, accessible to:

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

Remind your EAs/IAs to sign-up!

Sign up by visiting the site or scanning the QR code.



<https://sanctions.adb.org/>

ADB Debarment and Suspension Register

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Other Information

Application

Temporary Suspension

Debarment Period

Contract Variations

Sign-up here

Manual form available

Sign up: ADB Debarment and Suspension Register

ADB ASIAN DEVELOPMENT BANK

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

Application Form

Apply for access to Asian Development Bank full sanctions list:

Your Name*

First name Middle name Last name

Email Address*

Designation* Organization / Agency*

I.e. Deputy Secretary / Proj Officer I.e. Organization, Ministry, Employer, etc

Address* Country

Select a country

Telephone Number*

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*

I.e. Project Director etc

Project(s)*

ADB Loan number(s)*

Project is being executed/implemented by:

Organization / Agency*

ADB Project Officer's contact information:

Project Officer* Project Officer's ADB Email*

Information on why access is required

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.

The information will be granted without prejudice to the privileges and immunities conferred on ADB and its officers and employees by the Agreement Establishing the Asian Development Bank and other applicable sources of law. ADB reserves the right to invoke its privileges and immunities at any time with respect to the information provided and in any administrative or other proceedings.

☐ Accept Term

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

United Nations Security Council Sanctions: Obligations





- 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

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.



[Link to United Nations Security Council List](#)

<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>

Case Study 3

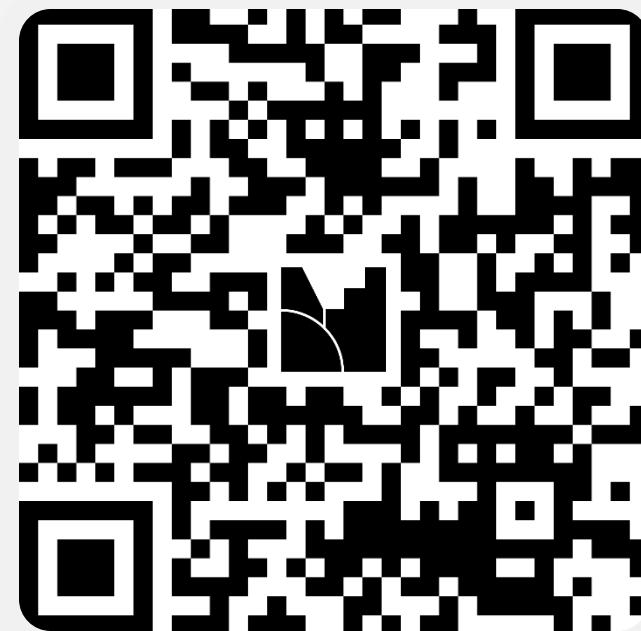
- Doubting the authenticity of the work experience certificate that a bidder submitted, the bid evaluation committee obtained confirmation from the previous employer who issued the work certificate.
- The previous employer confirmed that it did not issue the work experience certificate. The work experience certificate from the bidder is a fake document.



Case Study 3 (Continuation)

Which integrity violation did your due diligence help identify?

1. Fraudulent Practice
2. Conflict of Interest
3. Abuse
4. No, the bidder did not commit an integrity violation in this case.



Scan the QR Code or go to
menti.com and enter code **4860 6489**

Other Resources



Remember



Know the integrity violations.



Sign up to access the Complete List.



Identify and manage integrity risks.



Report suspected integrity violations to OAI.

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

Thank you!



www.adb.org/integrity



@adb_oai



integrity@adb.org



ADB Anticorruption and Integrity



+63-2-8632 5004



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



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