

The Integrity Learning Series

Georgia: Anticorruption and Integrity Training

Donabel Atienza

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.



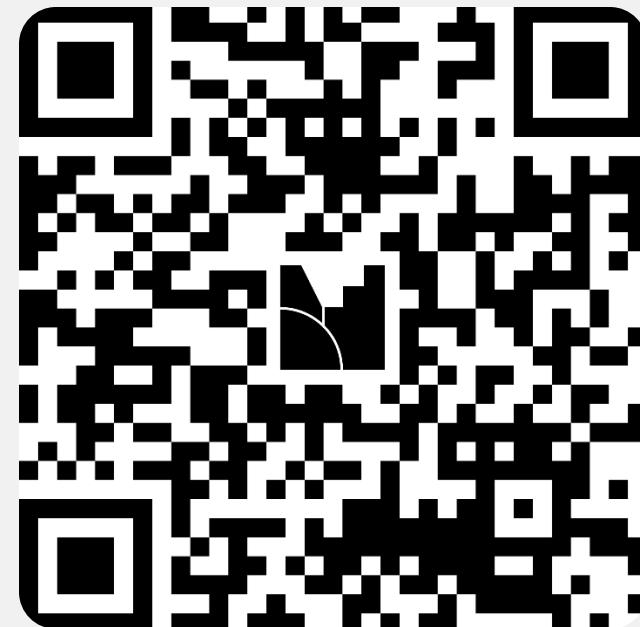
For Mentimeter, scan the QR Code or type menti.com.

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



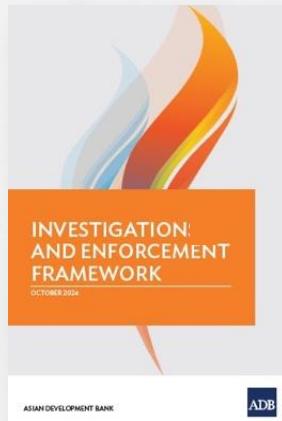
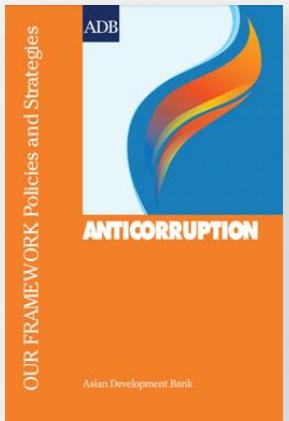
I. ADB's Anticorruption and Integrity Framework



ADB's Anticorruption and Integrity Framework

ADB

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



ADB Irrigation and
Water Project

**BIDDING IS
NOW OPEN**





Restaurant



Invitation For Bids

Bidding Announcement

We hope you all had a nice bidding season and a big congrats to all of our single bid! However, contract winners. Thank you all for a great year for making it such a wonderful season and a big thank to be a part of the all the staff! Stay tuned the year next comes to make big with your bidding great point!

New Download Feature
We have now created update that we wanted to make sure that you guys have access, like the first one will go over in the new and highly anticipated download feature. You can now easily download your bid document, your contract and upload them as you please, even those on



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

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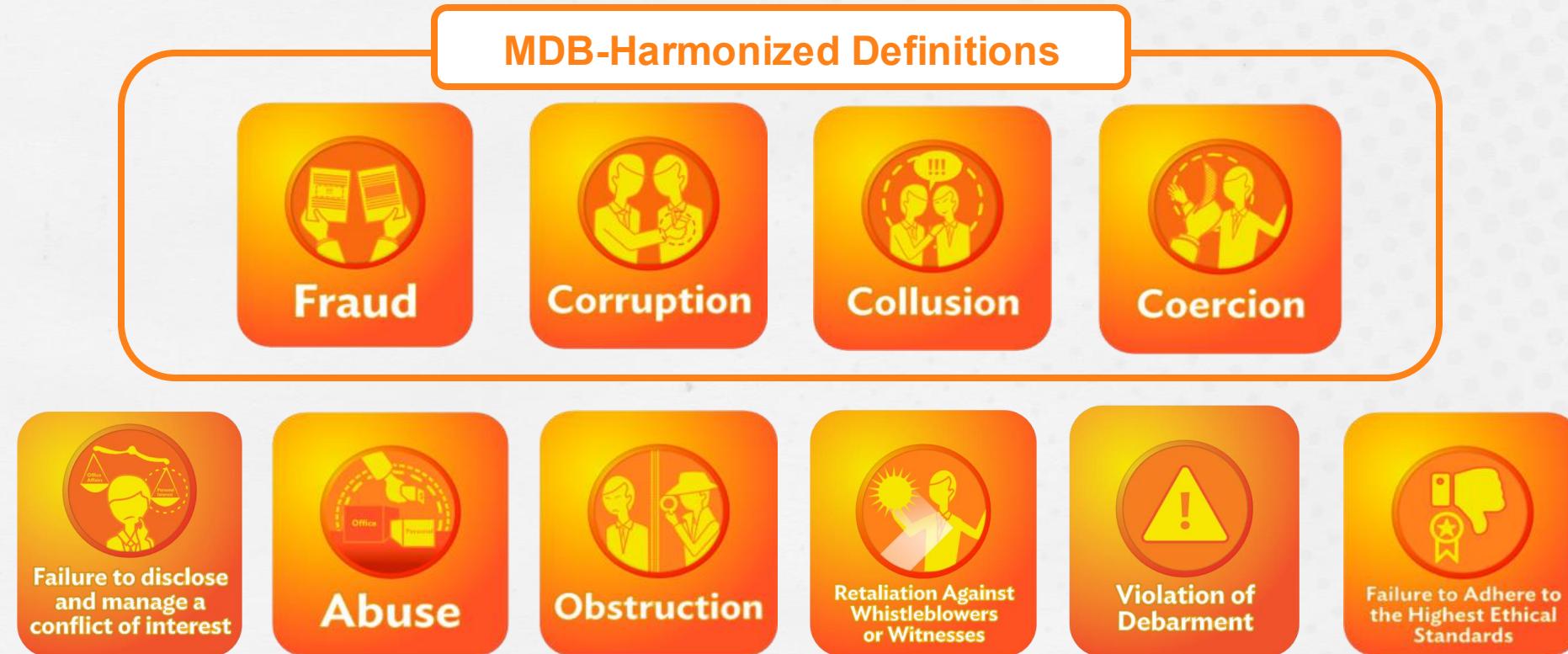
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Integrity Violations



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

ADB



Debarment of firms and individuals



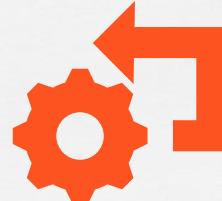
Suspension of the loan or grant allocations



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

ADB



Debarment



Debarment
with conditional reinstatement



Conditional Non-
Debarment



Reprimand



Restitution and / other
financial remedies

ADB Debarment and Suspension Register

ADB

PUBLISHED LIST

Accessible to the public

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.

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

ADB

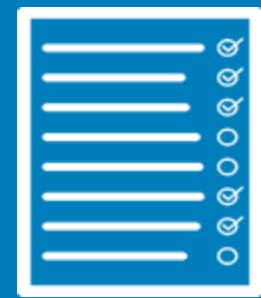
Current contacts



Contract variations



Future tenders



Reinstatement



MAY
CONTINUE

OAI
ENDORSEMENT

NOT PERMITTED

NOT AUTOMATIC

IV. Recognizing and Reducing Integrity Risk

- **Red Flags**
- Due Diligence





Integrity Risk

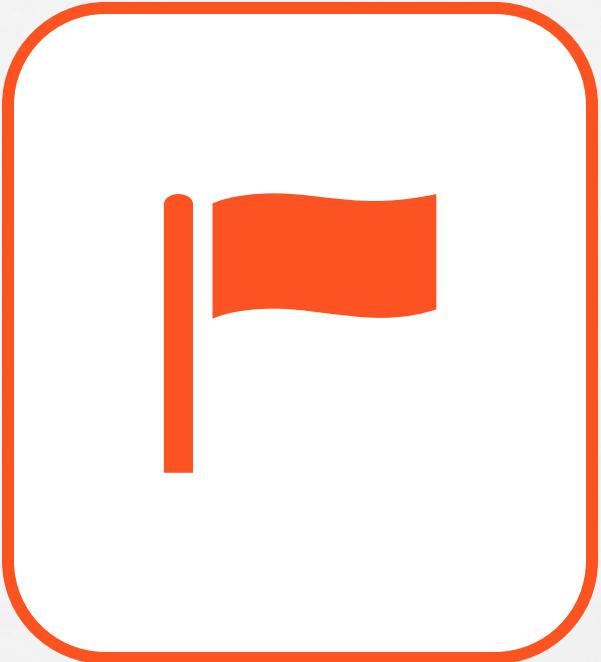
is the risk that a person or entity involved in ADB activities is implicated in financial or other ethical misconduct, resulting in potential adverse impacts on ADB.



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

ADB

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

ADB



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. !

🚩 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. 

🚩 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

ADB



Profile
Experienced full-stack web developer proficient in Java, Python, and JavaScript, with 5+ years of industry experience. Skilled in React, Node.js, PostgreSQL, and AWS, and holds certifications in AWS and Oracle. Known for strong problem-solving skills and for developing highly scalable systems. Seeking a lead software engineer role in the finance, healthcare, or e-commerce industry.

Work Experience

Senior Software Developer Jan 2021 – Dec 2022
Company – Country

- Develop and test software for XYZ product
- Collaborate with cross-functional teams to ensure product quality and timely delivery

Web Developer Jan 2019 – Dec 2020
Company – Country

- Developed responsive and accessible web applications using HTML, CSS, and JavaScript frameworks such as Angular and React.
- Collaborated with UX designers and back-end developers to ensure seamless integration of front-end and back-end functionalities.

Education
Masters in Software Engineering Jan 2019 – Dec 2020
Location

Bachelors in Computer Science Jan 2015 – Dec 2018
Location

Skills

- Object-Oriented Programming
- Database management
- Web development
- Problem-solving
- Communication

Languages
English: Fluent
French: Intermediate

ChatGPT
CV



Case Study 2

ADB

- 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.



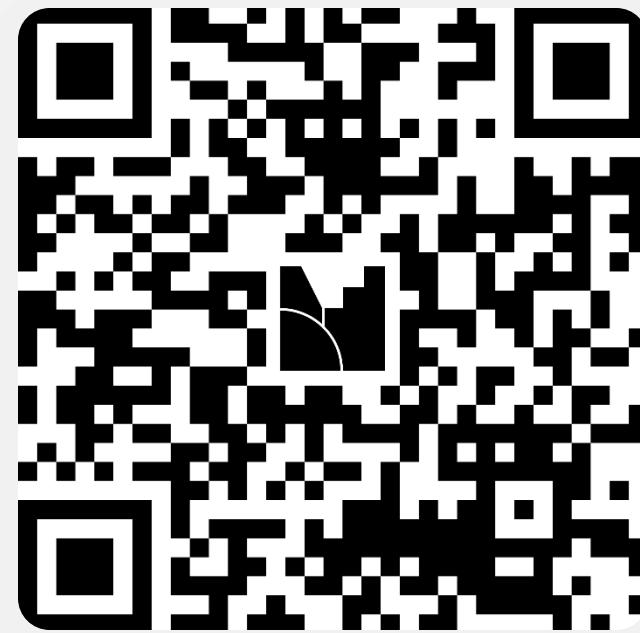
Case Study 2 (*Continuation*)

ADB

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.

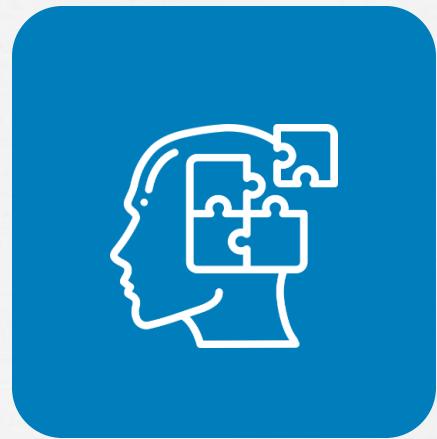


Scan the QR Code or go to
menti.com and enter code **4860 6489**

IV. Recognizing and Reducing Risk

- Red Flags
- Due Diligence





WHY?



WHO?



WHEN?



WHAT?

Factors in Conducting Due Diligence

ADB



Beneficial ownership



Financial background
and payment of contract



Competency of third party



Public records resources:
History of corruption
and adverse news



Reputation:
Commercial references



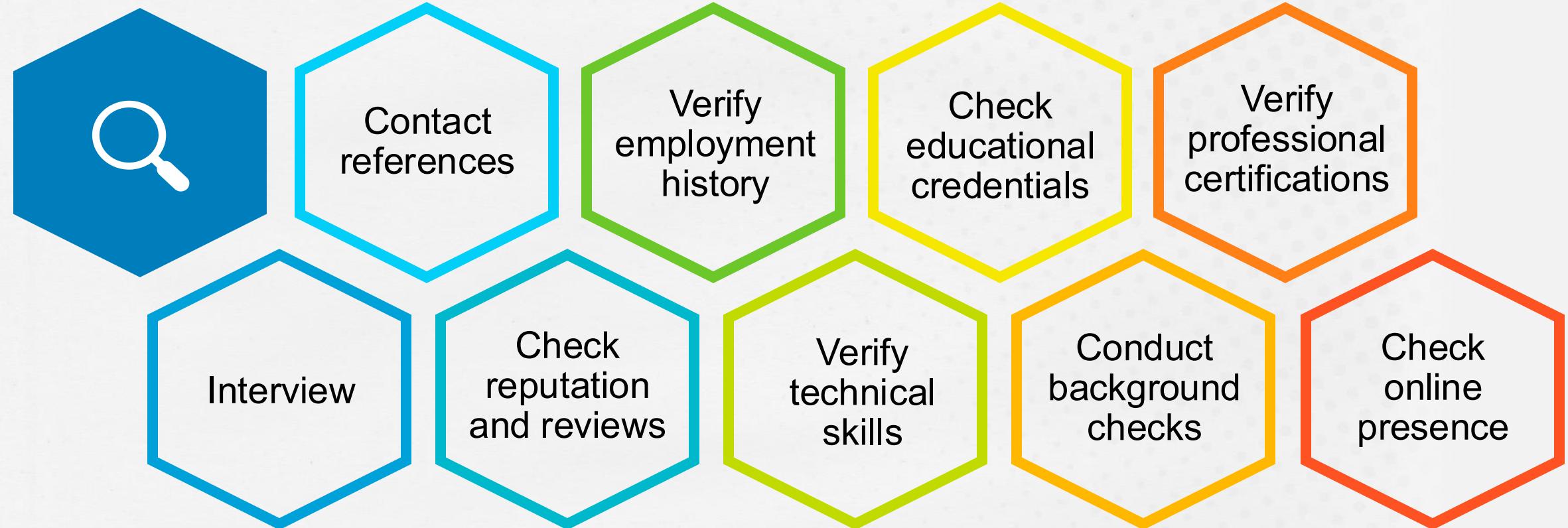
Approach to ethics
and compliance

Due Diligence: Sources



Conduct Due Diligence

ADB



Potential Risk Flags

ADB



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

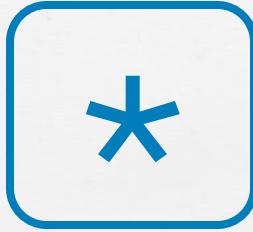
🔍 education **OR** training

Minus Operator (-)

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

More Search Techniques

ADB



Asterisk (*)
as a wildcard



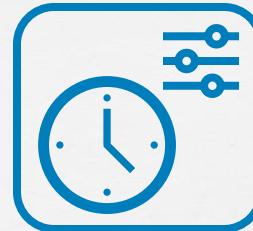
Site-specific
searches



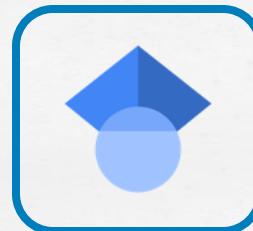
Advanced
search options



Related
searches



Time filters



Google Scholar



Reverse image
search

Debarment and Suspension Checks

ADB

PUBLISHED LIST

Accessible to the public

ADB Debarment and Suspension Register

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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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Sign-up here



Manual form
available

Sign up: ADB Debarment and Suspension Register

ADB

ADB ASIAN DEVELOPMENT BANK

Login Sign UP

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*
i.e. Deputy Secretary / Proj Officer Organization / Agency*
i.e. Organization, Ministry, Employer, etc

Address*
 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



United Nations Security Council Sanctions

ADB



Security Council

EN

X SEARCH

Search

FORCES DEMOCRATIQUES DE LIBERATION DU RWANDA



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

Xml

Html

List by Permanent Reference Number

Pdf

Xml

Html

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.

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Print to PDF



United Nations Security Council Consolidated List

Generated on: 31 July 2024

Generated on refers to the date on which the user accessed the list and not the last date of substantive update to the list. Information on the substantive list updates are provided on the Council / Committee's website.

Composition of the List

The list consists of the two sections specified below:

- Individuals
- Entities and other groups

Information about de-listing may be found at:

<https://www.un.org/securitycouncil/ombudsman> (for res. 1267)
<https://www.un.org/securitycouncil/sanctions/delisting/> (for other Committees)
<https://www.un.org/securitycouncil/content/2231.list> (for res. 2231)

Individuals

DI-001 Name: 1. ERIC 2. BADEGE 3: na 4: na
Title: na Designation: na DOB: 1971 POB: Good quality a.k.a.: na Low quality a.k.a.: na Nationality: Democratic Republic of the Congo Passport no: na National identification no: na Address: Rwanda as of early 2016 Listed on: 31 Dec. 2012 (amended on 13 Oct. 2016) Other information: He fled to Rwanda in March 2013 and is still living there as of early 2016. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices-View-UN-Notices-Individuals> click here

DI-002 Name: 1. FRANK KAKOLEE 2. BWAMBALE 3: na 4: na
Title: na Designation: FARDC General DOB: na POB: Good quality a.k.a.: a) FRANK KAKORERE b) FRANK KAKORERE BWAMBALE c) AIGLE BLANC Low quality a.k.a.: na Nationality: Democratic Republic of the Congo Passport no: na National identification no: na Address: Kinshasa, Democratic Republic of the Congo (as of June 2016) Listed on: 1 Nov. 2005 (amended on 13 Oct. 2016) Other information: He was born in 1970 and resides in Kinshasa, Democratic Republic of the Congo. He has had a career in activities apparently on behalf of the DRC Government. In December 2013 he established the Reconstruction des Zones Serrées des Confins Africains (RZSCA), including participation in a STAR-DRC unit. In March 2011 DRC authorities detained him in Beni, North Kivu Province, for allegedly blocking the DDR process. He left the DRC and lived in Kenya for some time, before being called back by the DRC Government to assist them with the situation in the territory of Beni. He was arrested in October 2013 in the area of Mambasa for allegedly supporting a Mai Mai group, but no charges were brought and as of June 2016, he is living in Kinshasa. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices-View-UN-Notices-Individuals> click here

DI-003 Name: 1. GASTON 2. IYAMUREMYE 3: na 4: na
Title: na Designation: a) FDLR Interim President b) FDLR-FOCA 1st Vice-President c) FDLR-FOCA Major General DOB: 1948 POB: Musanze District, Northern Province, Rwanda Good quality a.k.a.: b) Byiringiro Victor Rumali b) Victor Rumali c) Michel Byiringiro Low quality a.k.a.: Rumuli Nationality: Rwanda Passport no: na National identification no: na Address: North Kivu Province, Democratic Republic of the Congo (as of June 2016) Listed on: 1 Dec. 2010 (amended on 13 Oct. 2016) Other information: INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices-View-UN-Notices-Individuals> click here

DI-004 Name: 1. INNOCENT 2. KAINA 3: na 4: na
Title: na Designation: a) M23 Deputy Commander DOB: (Nov. 1973) POB: Bunagana, Rutshuru territory, Democratic Republic of the Congo Good quality a.k.a.: Colonel Innocent KAINA Low quality a.k.a.: India Queen Nationality: na Passport no: na National identification no: na Address: Uganda (as of early 2016) Listed on: 30 Nov. 2012 (amended on 13 Oct. 2016) Other information: Became M23 deputy commander after the flight of Bosco Tshabangu's faction to Rwanda in March 2013. Fleed to Uganda in November 2013. In Uganda as of early 2016. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices-View-UN-Notices-Individuals> click here

DI-005 Name: 1. JÉRÔME 2. KAKWAVU BUKANDE 3: na 4: na
Title: na Designation: a) DOB: na POB: Goma, Democratic Republic of the Congo Good quality a.k.a.: Jérôme Kakwava Low quality a.k.a.: Commandant Jérôme Nationality: Democratic Republic of the Congo Passport no: na National identification no: na Address: na Listed on: 1 Nov. 2005 Other information: Given the rank of General in the FARDC in December 2004. As of June 2011, detained in Makala prison in Kinshasa. As of 23 March 2011, the High Military Court in Kinshasa opened a trial against Kakwava for war crimes. In November 2014, convicted by a DRC military court to ten years in prison for rape, murder, and torture. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices-View-UN-Notices-Individuals> click here

DI-006 Name: 1. GERMAIN 2. KATANGA 3: na 4: na
Title: na Designation: a) DOB: na POB: na Katanga, Ituri Province, Democratic Republic of the Congo Good quality a.k.a.: na Low quality a.k.a.: na Nationality: Democratic Republic of the Congo Passport no: na National identification no: na Address: Democratic Republic of the Congo (in prison) Listed on: 1 Nov. 2005 (amended on 13 Oct. 2016) Other information: Appointed General in the ARDC in December 2004. Handled over by the Government of the DRC to the International Criminal Court on 18 October 2007. Initially convicted on 23 May 2014 by the ICC to 12 years in prison for war crimes and crimes against humanity; the ICC Appeals Chamber reduced his sentence and determined that Katanga's sentence should be completed on 15 January 2016. Although he was detained in the Netherlands for the duration of his trial, Katanga was transferred to a DRC prison in December 2015 and charged for other crimes previously committed in Ituri. click here

Search options

Link to United Nations Security Council List

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

Case Study 3

ADB

- 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.

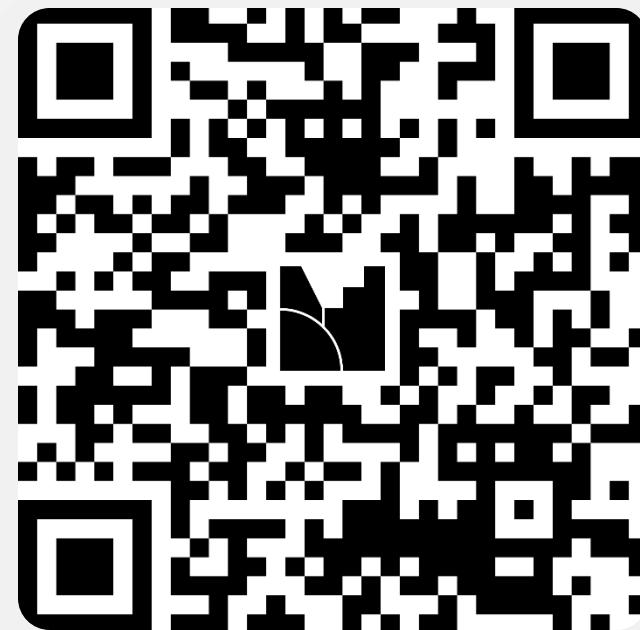


Case Study 3 (*Continuation*)

ADB

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

ADB



Remember

ADB



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.

