

The Integrity Learning Series

# Anticorruption and Integrity in ADB Projects

## INDIA: Project Directors' Orientation Forum

**Maria Carmela S. Concepcion**  
Integrity Officer

22 April 2025  
Hybrid Session

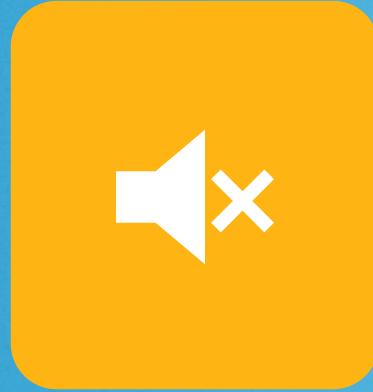
# Reminders



The session is being recorded.



Reserve questions at the end of the presentation.



If online, please remain on mute if not speaking.



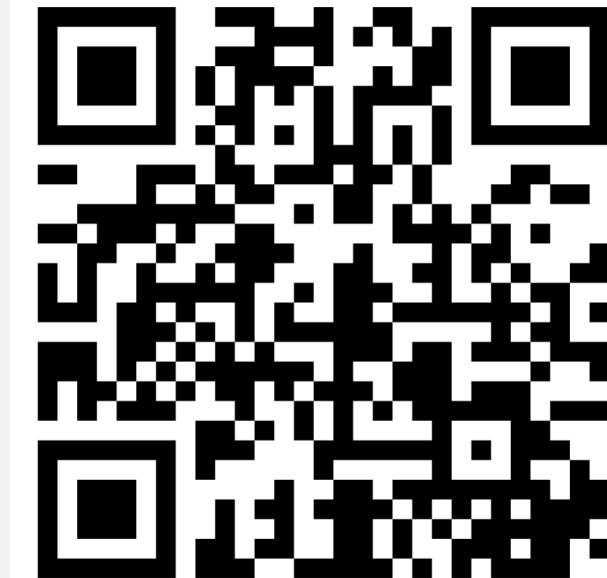
For Mentimeter, scan the QR Code or type [menti.com](https://menti.com).

## 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](https://menti.com) and enter code **7452 4256**

# What to expect

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



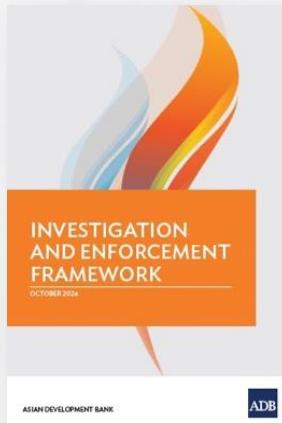
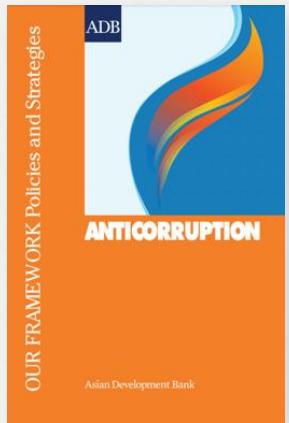
# I. ADB's Anticorruption and Integrity Framework



# 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](https://menti.com)  
and enter code  
**7452 4256**





# Rural Roads Rehabilitation Project



ADB Irrigation and  
Water Project

# BIDDING IS NOW OPEN



Failure to disclose  
and manage a  
conflict of interest



# 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, content remains. Thank you all for a great bidding season and a big effort to be a part of the bid. The staff truly enjoyed the year and thanks to the big bids, we are making great progress!

**New Download Feature**  
We have now created a feature that we wanted to make sure that you guys have access. The first one will go out in the next one highly anticipated download bid. You can now easily download your bid document, just click on download and upload them as you please, now these are



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

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# Integrity Violations

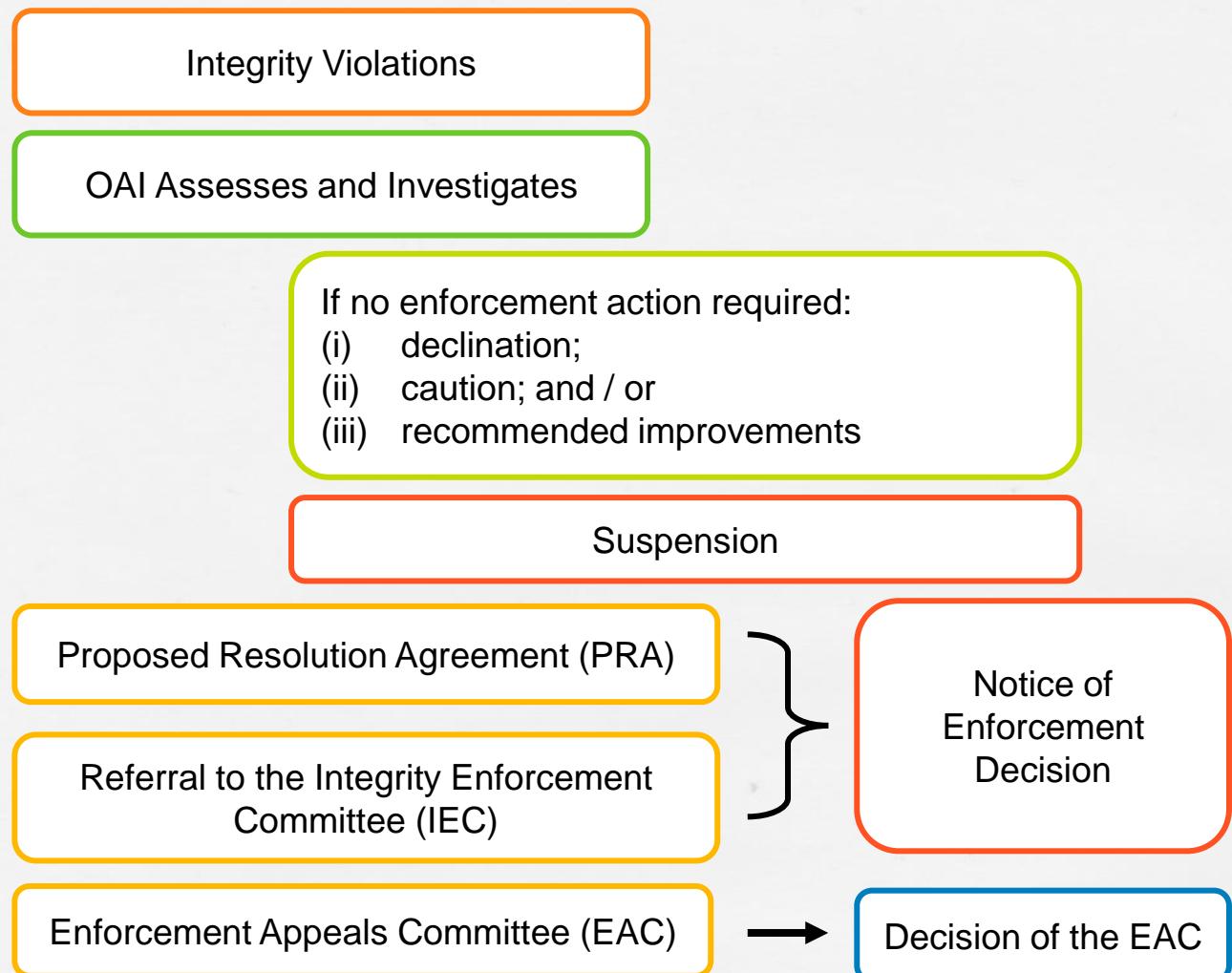


# III. Enforcement Actions and Impact

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



# Investigation and Enforcement Process



# Enforcement and Disclosure Actions



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

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**NO LOGIN REQUIRED**  
Publicly Disclosed Debarment or Suspension  
[View Publicly Disclosed Debarment or Suspension](#)

**AUTHORIZED USERS ONLY**  
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**What you will see in this subregister:**

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**How do I get access to this list?**

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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](mailto: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

<http://sanctions.adb.org>

# Consequences of Integrity Violations in ADB-financed Projects



**Debarment** of firms and individuals



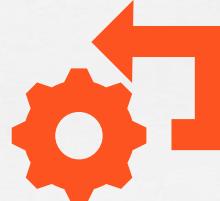
**Suspension** of the loan or grant allocations



**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



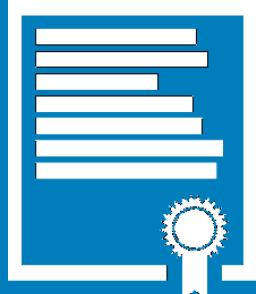
**Cross** debarment



# 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.

Such misconduct includes any act which violates ADB's Anticorruption Policy, namely corrupt, fraudulent, coercive, or collusive practice, and other integrity violations as defined.

Such misconduct also encompasses other improper activity, including money laundering, terrorist financing, tax evasion, and predicate offences as defined by international standards in relation to financial crime risks.

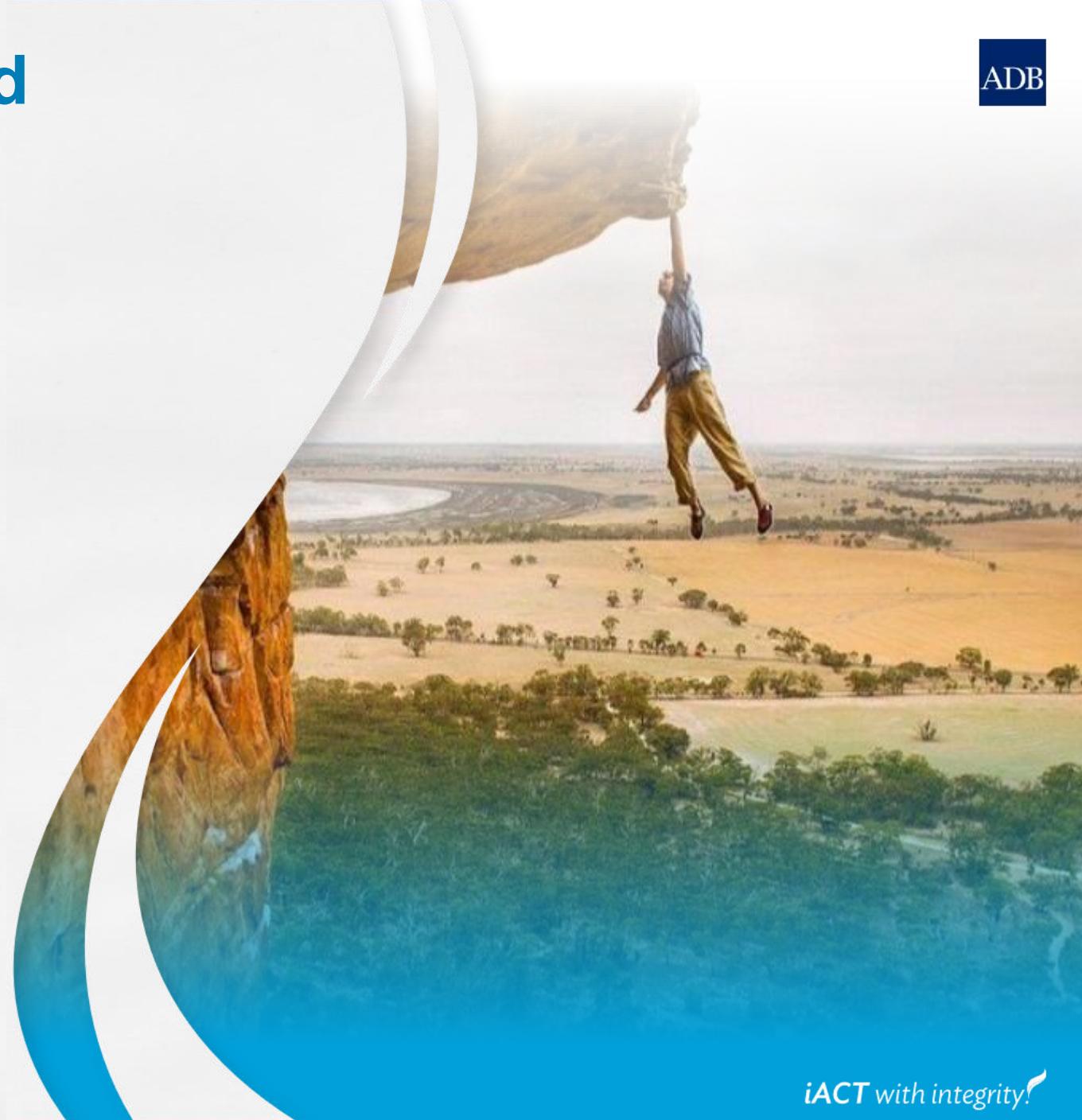


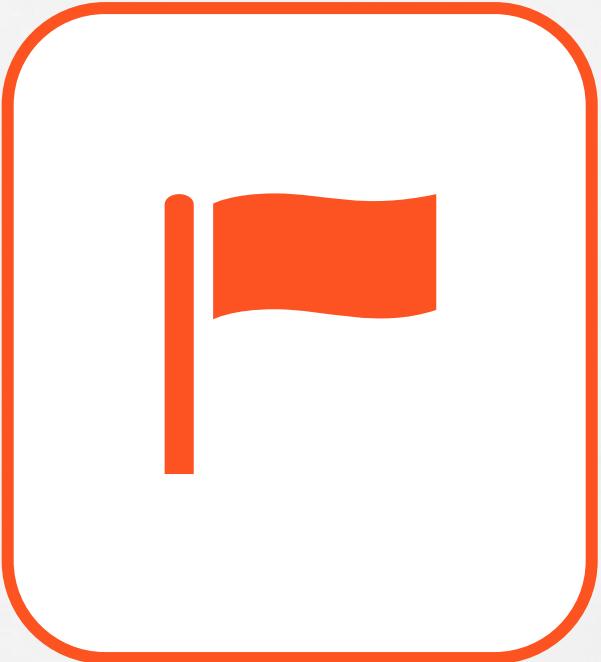
# How is Integrity Risk related to Reputational Risk?

ADB, executing and implementing agencies, and its personnel depend on its reputation to achieve its mandate.

Reputational risk may be considered as the risk that our stakeholders and/or the communities where we operate, lose confidence in, and respect for, us and our ability to achieve our development mission.

Our association with persons who may have engaged in financial or ethical misconduct (integrity incidents), even misconduct unrelated to ADB activities, can damage 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.

## Case Study 2

- You are a member of the bid evaluation committee for an ADB-financed project. The bid security submitted by one of the bidders for a civil works package had spelling errors, the bank's logo was distorted, and while there was a stamp, there was no signature of a bank official. You identified these as red flags.
- You then inquired with the supposed issuing bank whether the bid security submitted is real. The bank's response confirmed your suspicion.



## Case Study 2 (*Continuation*)

ADB

Which integrity violation do you think was committed in this case?

1. Fraudulent Practice
2. Collusive Practice
3. Corrupt Practice



Scan the QR Code or go to  
[menti.com](https://menti.com) and enter code **7452 4256**

# Case Study 3

- 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 3 (*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  
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## Case Study 4

- Shortly after the unannounced and unrecorded site visit, you noticed the head of the bid evaluation committee has started coming to the office in a new luxury vehicle.
- This surprised you and your other colleagues as he has been driving an old mid-level sedan for years. For you, this is a red flag for potential integrity violation. Putting two and two together, you suspect he received the luxury vehicle from the potential bidder he had met recently.

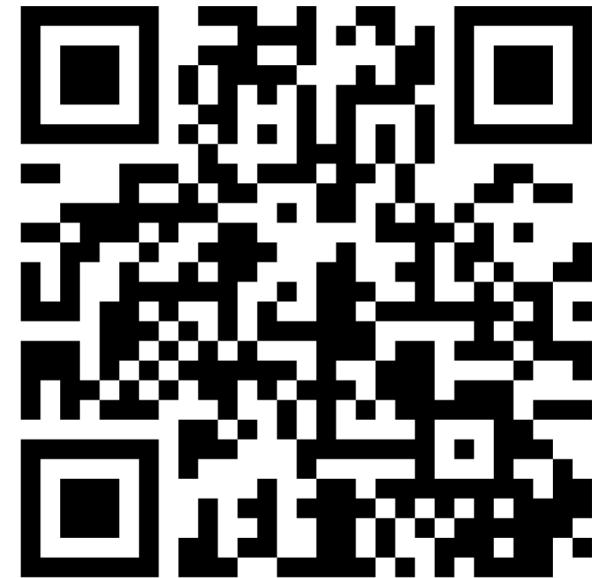


## Case Study 4 (*Continuation*)

ADB

If your suspicion is established to be true, which integrity violation do you think the head of your bid evaluation committee and the potential bidder may have committed in this case?

1. Conflict of Interest
2. Fraudulent Practice
3. Corrupt Practice
4. Abuse



Scan the QR Code or go to  
[menti.com](https://menti.com) and enter code **7452 4256**

# Case Study 5

- An executive of the largest supply company in your country is the daughter of the minister whose agency oversees several ADB-financed projects. One of your staff is a member of the procurement committee for one of the projects.
- Your staff received a bid for a project contract from the company of the minister's daughter. In its bid, the company did not disclose the connection between its executive and the minister. Also, shortly after, you received a call from the minister who ordered you to direct your staff to award the contract to his daughter's company, otherwise he will ensure that you are removed from your position. For you this is an obvious and glaring red flag.

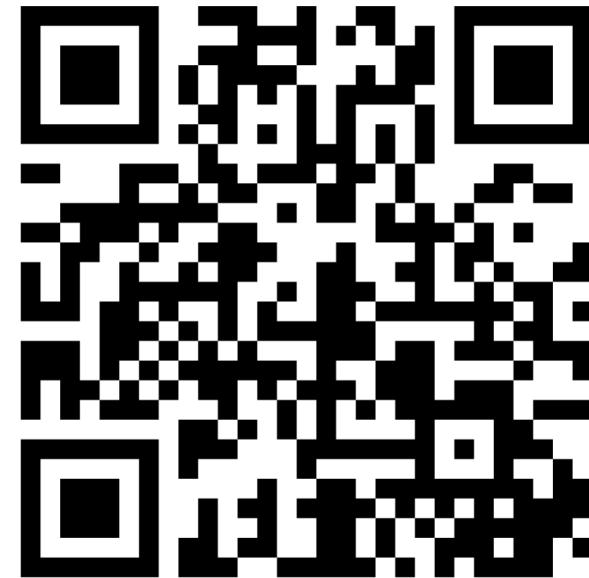


## Case Study 5 (*Continuation*)

ADB

Recognizing the red flag, what integrity violation(s) do you think was/were committed in this case? Select the best answer.

1. Conflict of Interest
2. Coercive Practice
3. Conflict of Interest and Coercive Practice
4. Conflict of Interest and Corrupt Practice



Scan the QR Code or go to  
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# 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

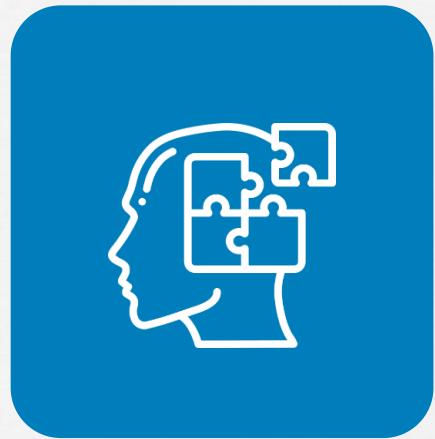
# ChatGPT CV



## II. 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



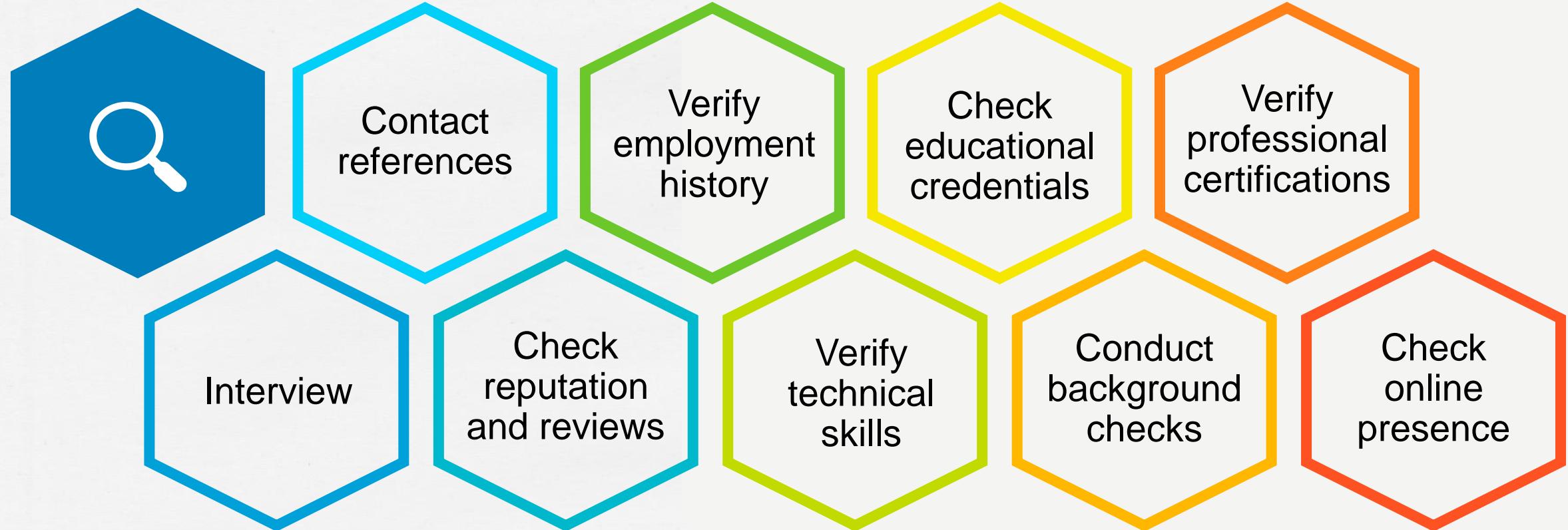
Approach to ethics  
and compliance

# Conduct Due Diligence

ADB



# Conduct Due Diligence



# Conduct Integrity Due Diligence

ADB

## Potential Risk Flags



Bribery, corruption



Fraud, embezzlement



Money laundering,  
terrorist financing



Criminal convictions

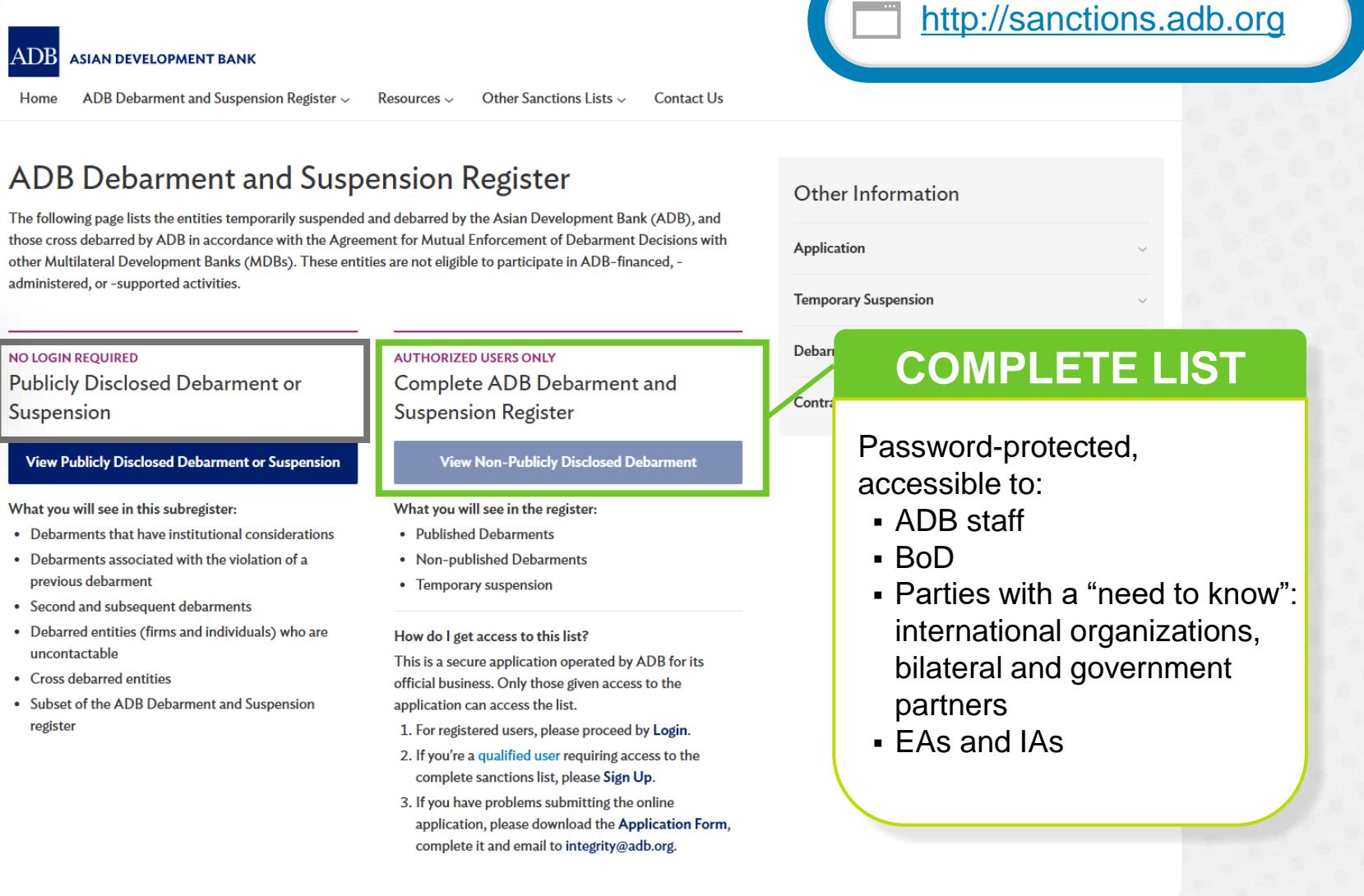


Illegal or disreputable activities



# Conducting Due Diligence: Debarment Checks

ADB



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Accessible to the public

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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](mailto:integrity@adb.org).

**COMPLETE LIST**

Password-protected, accessible to:

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

<http://sanctions.adb.org>

# Conducting Due Diligence: Debarment Checks

ADB

ADB ASIAN DEVELOPMENT BANK

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

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<http://sanctions.adb.org>

### Other Information

Application

Temporary Suspension

Debarment Period

Contract Variations

Sign-up here

Manual form available

# 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](mailto:sc-sanctionslists@un.org).

To Save this page as a PDF document 1) click the 'Print to PDF' button 2) Select desired printer Save to PDF or the option that your system provides 3) click the print button 4) Select the destination in your machine to save the pdf document

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:  
1. Individuals  
2. 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/](https://www.un.org/securitycouncil/content/2231_list/) (for res. 2231)

#### 1. 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 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  
status web link: <https://www.interpol.int/en/How-we-work/Notices-View-UN-Notices-Individuals> click here

**Di.002** Name: 1. FRANK KAKOLELE 2: BWAMBALE 3: na 4: na  
Title: na Designation: FARDC General DOB: 1970 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: a) 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 in the Democratic Republic of the Congo and resides in Kinshasa. He has been involved in activities on behalf of the DRC government. A Project de  
l'habitation et de Reconstruction des Zones des Confins Africain (PROICA), including participation in a STAR-DRC mission to Goma and Beni in March 2013. Fleed to 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 lived 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. IVANCUREMPE 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) Biringiro Victor Ruruli b) Victor Rururi c) Michel Biringiro Low quality a.k.a.: Ruruli 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: a) 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 Tshanganya'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 BUKANDJE 3: na 4: na  
Title: na Designation: a) DOB: (Apr. 1979) POB: Lubumbashi, Katanga Province, Democratic Republic of the Congo Good quality a.k.a.: Jérôme Kakwau Low quality a.k.a.: Commandant Jérôme Nationality: Democratic Republic of the  
Congo Passport no: National identification no: a) Address: Lubumbashi (as of early 2016) 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  
rue, and tower. 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: (Apr. 1979) POB: Lubumbashi, Katanga 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: National identification no: a) Address: Lubumbashi (as of early 2016) 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 18 January 2016. Although he was detained in the Netherlands  
as the duration of his trial, Katanga was transferred to a DRC prison in December 2015 and cleared for other crimes previously committed as from [click here](#)

## Search options

### Link to United Nations Security Council List

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

# Case Study 6

- 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.
- 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 6 (*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](https://menti.com) and enter code **7452 4256**

# Other Resources

ADB



# 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!



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Report integrity violations :  
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