



Office of Anticorruption and Integrity

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

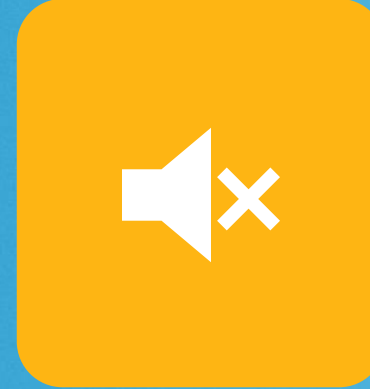
Reminders



The session is
being recorded.



Reserve
questions at the
end of the
presentation.



If online, please
remain
on mute if not
speaking.



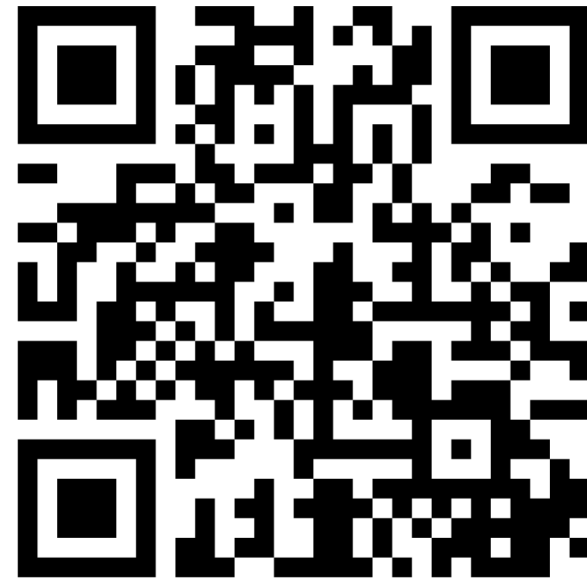
For Mentimeter,
scan the QR
Code or type
menti.com.

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.



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and enter code **7452 4256**

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
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Rural Roads Rehabilitation Project

Project Director

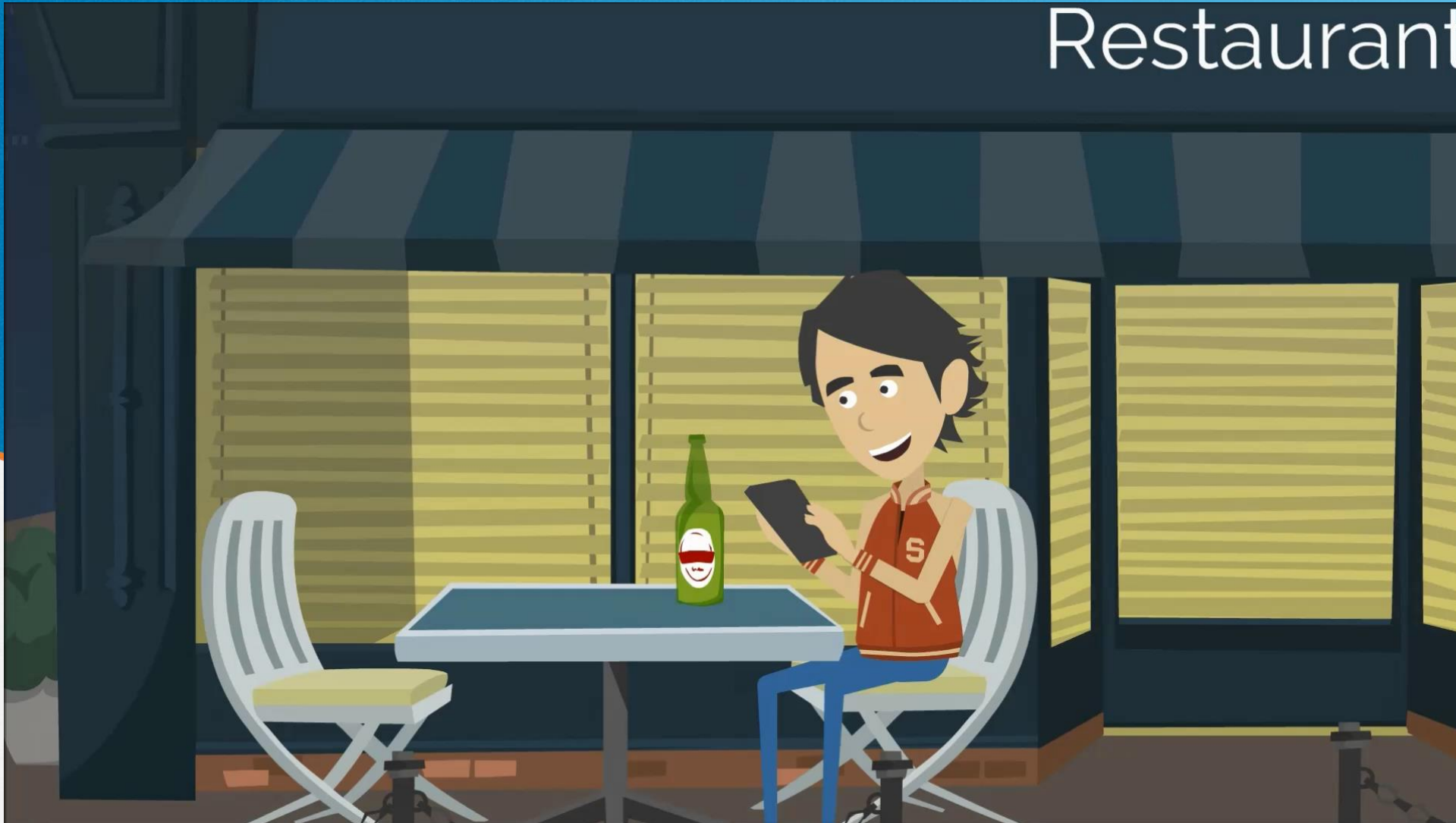


ADB Irrigation and Water Project **BIDDING IS NOW OPEN**





Restaurant



Invitation For Bids

Bidding Announcement



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

We hope you all find a nice holiday season and a big congrats to all of our people that returned from the Vietnam conflict. Thank you all once again for making it such a successful season and a lot of fun to be a part of the all staff. We need the your next Christmas who try with some smiling good people!

We have some exciting updates that we wanted to make sure that you guys knew about. The first one I will go over is the new and highly anticipated third round format. Yes, now you can really download your favorites and upload them

[illegible]

We hope you all had a nice holiday season and a big congrats to all of our likeable folk! Please contact us soon. Thank you all once again for making it such a successful season and a lot of fun to be a part of for the staff! We thank for your next chance to join big with some exciting great stuff!

[illegible]

Collusion



Integrity Violations

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**

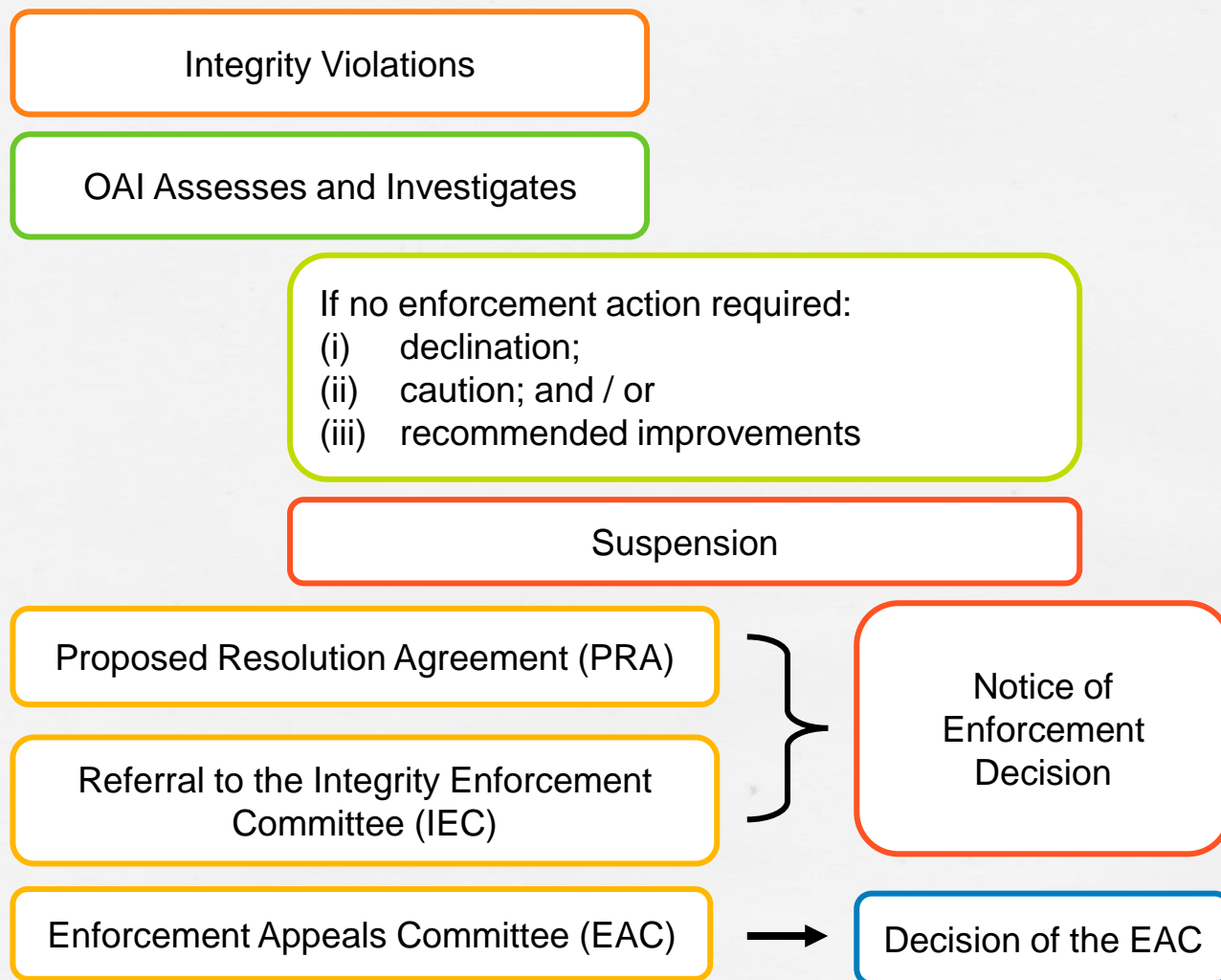


Failure to Adhere to
the Highest Ethical
Standards

III. Enforcement Actions and Impact

- 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

 <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
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- Subset of the ADB Debarment and Suspension register

AUTHORIZED USERS ONLY

Complete ADB Debarment and Suspension Register

[View Non-Publicly Disclosed Debarment](#)

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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.

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

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

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.

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.

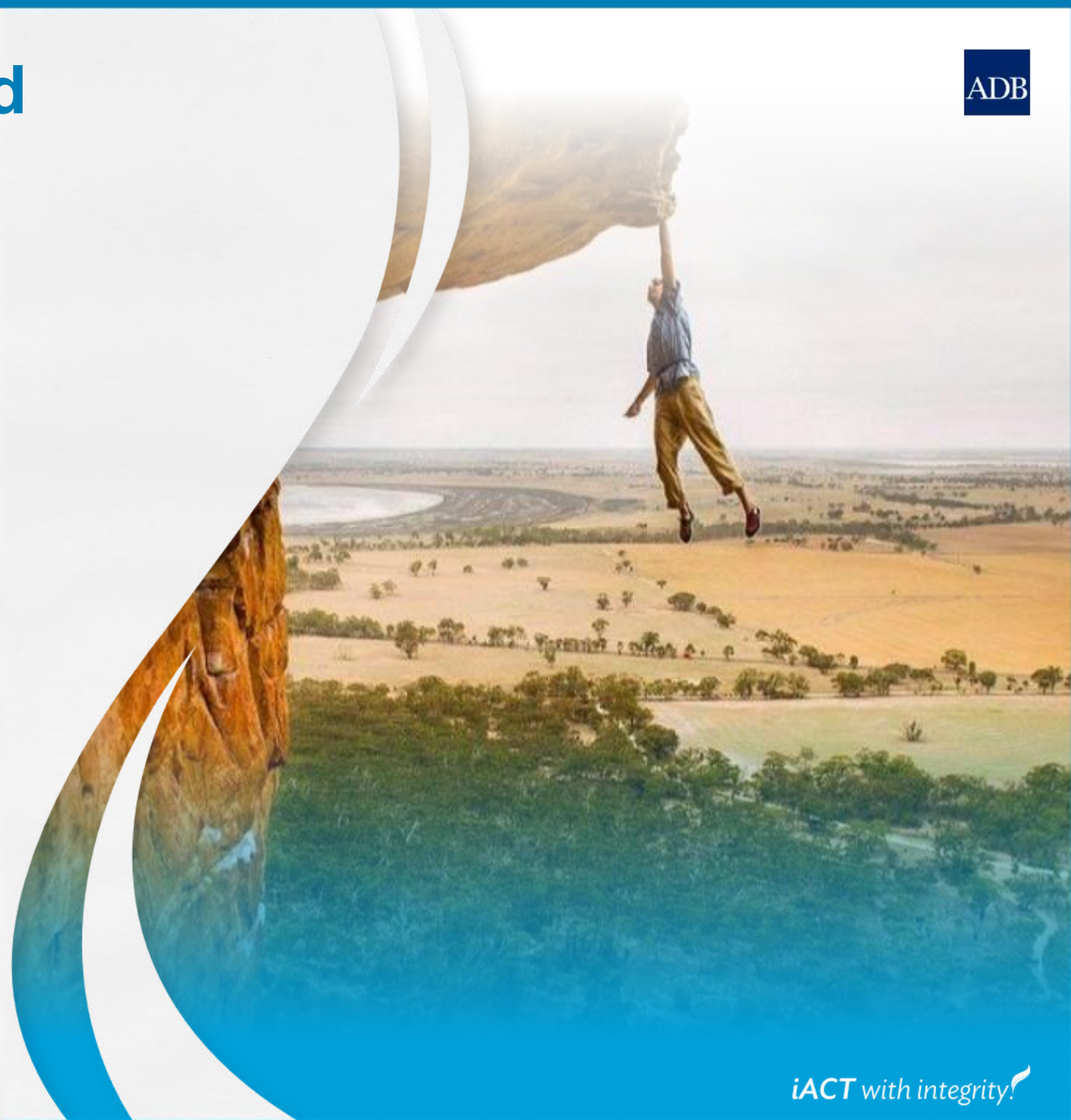


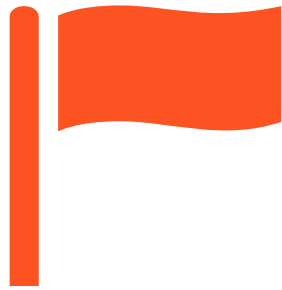
How is Integrity Risk related to Reputational Risk?

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



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

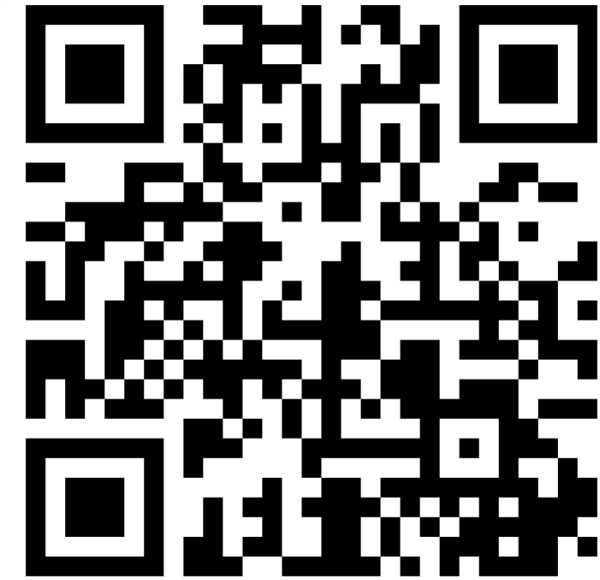
- You are a member of the bid evaluation committee for an ADB-financed project. The bid security submitted by one of the bidders for a civil works package had spelling errors, the bank's logo was distorted, and while there was a stamp, there was no signature of a bank official. You identified these as 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)

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

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



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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)

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.



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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)

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



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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)

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
menti.com and enter code **7452 4256**

Fake CVs or credentials



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

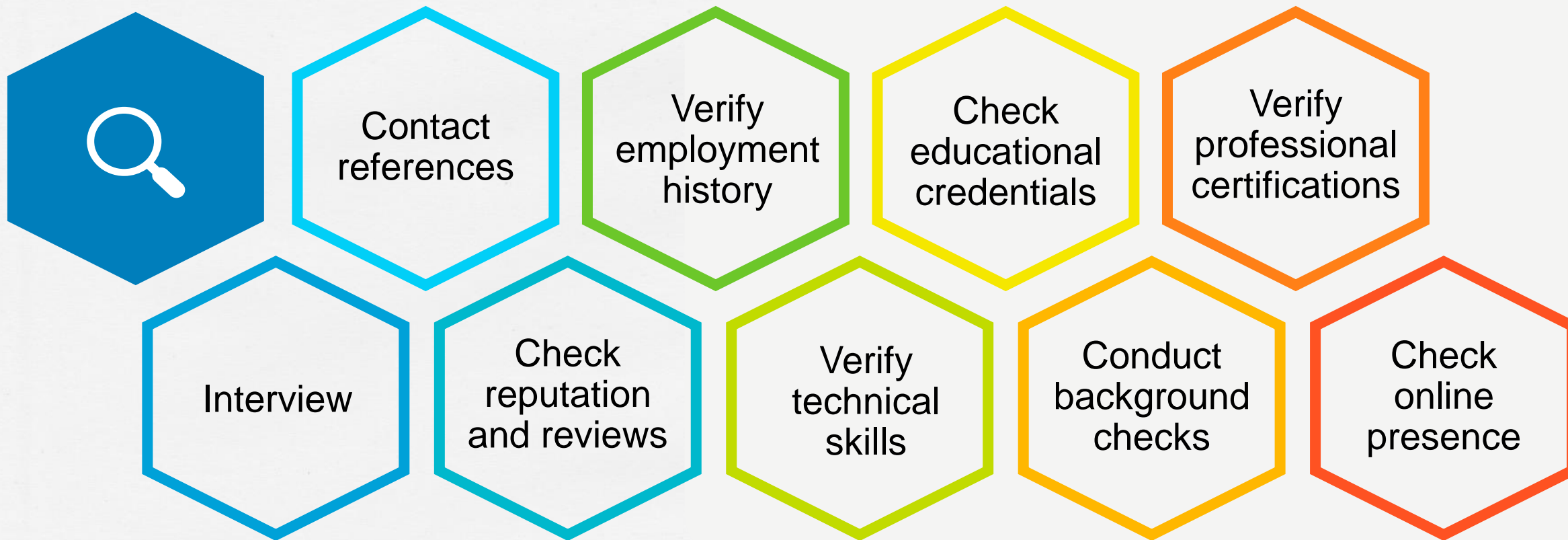


Approach to ethics
and compliance

Conduct Due Diligence



Conduct Due Diligence



Conduct Integrity Due Diligence

Potential Risk Flags



Bribery, corruption



Fraud, embezzlement



Money laundering, terrorist financing



Criminal convictions



Illegal or disreputable activities



Conducting Due Diligence: Debarment Checks

 <http://sanctions.adb.org>

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Conducting Due Diligence: Debarment Checks

 **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

 **United Nations**

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/ombudsperson/for res. 1267>
<https://www.un.org/securitycouncil/sanctions/de-listing/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 KAKOLELE 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:** Left the CNDP in January 2008. As of June 2011, resides in Kinshasa. Since 2010, Kakolele has been involved in activities apparently on behalf of the DRC government's Programme de stabilisation et Reconstruction des Zones Sortant des Conflits Armés (STAREC), including participation in a STAREC mission to Goma and Beni in March 2011. DRC authorities arrested him in December 2013 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 2015 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. IVAMUREMYE 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.:** 1) Byiringiro Victor Rumuli b) Victor Rumuli 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:** Former 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 Taganda's faction to Rwanda in March 2013. Fled 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:** na **DOB:** na **POB:** Goma, Democratic Republic of the Congo **Good quality a.k.a.:** Jérôme Kakwavu **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 25 March 2011, the High Military Court in Kinshasa opened a trial against Kakwavu 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:** na **DOB:** 28 Apr. 1978 **POB:** Mambasa, 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. Handed 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 for the duration of this 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)

<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)

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 **7452 4256**

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



@anticorruptionandintegrity



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ADB Anticorruption and Integrity



Report integrity violations :

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



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