



Office of Anticorruption and Integrity

The Integrity Learning Series

Anticorruption and Integrity Training

January Sanchez
Principal Integrity Specialist

Maria Dionelle Facun
Senior Integrity Officer

20 June 2025
Astana, Kazakhstan

Reminders



Interact – the more you put in, the more you take away.



Safe and confidential environment for learning and sharing.



No penalties for asking questions or for incorrect answers.

Objectives



Understanding the cost of corruption and the roles and responsibilities of different stakeholders

**9:30 AM to
10:00 AM**



Identifying and mitigating integrity risks

**10:00 AM to
3:45 PM**



Building a culture of Integrity

**3:45 PM to
4:45 PM**

Mentimeter Scenario 1:

You find a wallet on the street containing a large sum of money and the owner's ID.

Would you:

1. Keep the money, justifying it as *"finders' keepers"*?
2. Report the wallet to the lost and found, hoping the owner claims it?
3. Contact the owner directly using the ID, prioritizing returning the money?



Scan the QR Code or go to menti.com
and enter code **8739 3466**

Every year, **\$1 trillion** is paid in bribes, while an estimated **\$2.6 trillion** is stolen annually through corruption.

A sum equivalent to more than **5%** of the global GDP.

United Nations Security Council 10 September 2018

“

Corruption is the **single greatest obstacle** to economic and social development around the world.

Corruption Perceptions Index

EASTERN EUROPE AND CENTRAL ASIA

KAZAKHSTAN


Score

40/100

Rank

88/180

Score change

 **+1** since 2023

Roles and Responsibilities of different stakeholders

Government



Enacting **laws**, fostering **transparency**,
enforcing **regulations**

Mentimeter Scenario 2:

What is the most relevant responsibility of government in promoting integrity?

- A. Develop and enforce clear laws and regulations against corruption.
- B. Foster transparency and accountability in public institutions.
- C. Provide adequate resources and training for ethical conduct in government.



Scan the QR Code or go to menti.com
and enter code **8739 3466**

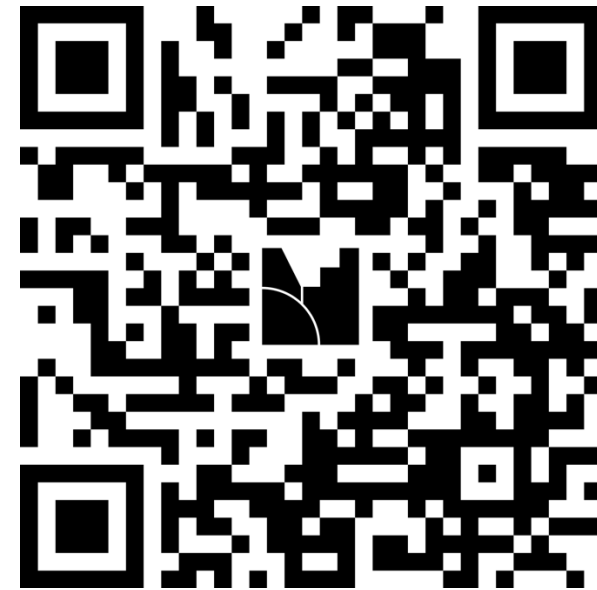


Raising **awareness**, **monitoring**,
advocating for reform

Mentimeter Scenario 3:

What is the most relevant responsibility of civil society in promoting integrity?

- A. Raise awareness about the importance of integrity and its impact on society.
- B. Monitor and advocate for ethical practices in government and businesses.
- C. Provide platforms for dialogue and collaboration on anti-corruption initiatives.



Scan the QR Code or go to menti.com
and enter code **8739 3466**



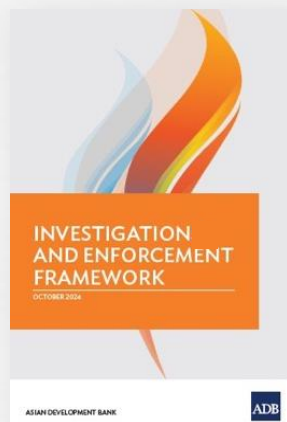
Reporting corruption



Conducting **ethical** business practices,
implementing integrity measures

ADB's Anticorruption and Integrity Framework

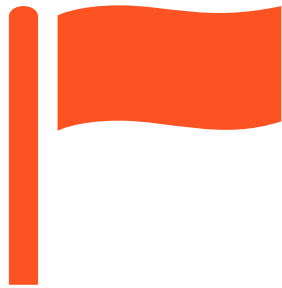
Applies to **executing and implementing agencies, contractors, consultants, suppliers, ADB staff, and anyone connected** to an ADB-financed, administered, or supported activity.



Identifying and Mitigating Integrity Risks

I. Recognizing and Reducing Risk

- **Red Flags**
- Due Diligence



Be alert to the
red flags of
integrity risks.

What are Integrity Risks?

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

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.

Group Activity on identifying Red Flags in Public Procurement and Donor-funded Projects

Each team will be provided 6 sets of documents. Each Team will go through the documents and:

1. Discuss among groups to identify:
2. red flag/s;
 - integrity violation/s in the given case/s
3. Share with the whole group (3 to 5 minutes)

Invitation For Bids

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

Bidding Announcement

We hope you all had a nice holiday season and are beginning to get back to work. We want to take a moment to thank you for your support of the American Cancer Society. We are grateful for your support and the donations you have made. We are grateful for the support of the American Cancer Society. We are grateful for the support of the American Cancer Society. We are grateful for the support of the American Cancer Society.

Now Download Feature
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 down-
load feature! Yes, now you
can easily download your
movies and upload them

[illegible]

We hope you all had a nice holiday season and a big congrats to all our Chicago 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 the last one!! We thank for your work chance to who big with some exciting opportunities.

New Universal Studios
 We have some exciting
 explains that we want to
 realize that you guys
 know about the first one
 will go over the new and
 highly anticipated theme
 land. Universal's new
 one really described your
 creation and explain how
 to possible, we'll have a

If there you have selected the video you would like to download, underneath it you will see a large orange button that says "Download this animation". This is the button you will want to click. There is a star for the feature and it stars depend on the length of the video. However, the first download is automatically 100% off and subsequent downloads are currently 75% off the normal price! Let us make this so that all you can get quality in CHEAPEST prices! The video is rated as PG-13. The video is made by SAGE (SAGE, 800-678-6, 800-678-6, 800-678-6, 800-678-6) the studio is SAGE (SAGE, 800-678-6, 800-678-6, 800-678-6, 800-678-6) in their words, it's very



NOTE

The bidder must

Letter of Bid

Bid Submission Sheet

NOTES

1. The bidder must accomplish the Bid Submission Sheet and address.

2. To be used for Single-Stage Bidding only.

To: [insert complete name and address of the bidder]

Date:

International Competitive Bidding (ICB) No.:

Invitation for Bid (IFB) No.:

Alternative No.:

[Insert identification no. if this is an alternative bid; if alternative bid is not permitted, delete this field]

We, the undersigned, hereby certify that we have no conflict of interest with participating firms.

(a) We have no conflict of interest with participating firms.

Review bid/proposals to identify potential or actual COI. BEC/CSC members should also ensure that they have no conflict with participating firms.

Bidder's Qualification

Form ELI – 1: Bidder's Information Sheet

Bidder's Information	
Bidder's legal name	
In case of a Joint Venture, legal name of each partner	
Bidder's address and country of constitution	

Information on incorporation documents, shareholders, owners and managers, authorized representative, JV partners, legal address and country of constitution should be in order

Evaluation and Qualification Criteria

Form LIT – 1: Pending Litigation and Arbitration

Each Bidder must fill out this form if so required under Criterion 2.1.2 of Section 3 (Evaluation and Qualification Criteria) to describe any pending litigation or arbitration formally commenced against it.

In case of a Joint Venture, each Partner's name below:

Joint Venture Partner's name below:

Form FIN – 2: Size of Operation (Average Annual Turnover)

Each Bidder must fill out this form.

The information supplied should be the Annual Turnover of the Bidder or each member of a Joint Venture of the amounts billed to clients for each year for work in progress or completed, converted to US dollars, of exchange at the end of the year.

Form FIN – 1: Historical Financial Performance

In case of a Joint Venture, each Partner's name below:

Each Bidder must fill out this form.

In case of a Joint Venture, each Partner must fill out this form separately and provide the Joint Venture Partner's name below:

Joint Venture Partner's name below:

Form EXP – 1: Contractual Experience

Fill out one (1) form per contract.

Contractual Experience

Contract No. of

Contract Identification

Form EXP – 2: Technical Experience

Fill out one (1) form per contract.

Technical Experience

Name of Product:

Should meet the bid qualification requirements

Bill of Quantities/List of Goods and Related Services

1. List of Goods and Related Services

The purpose of the List of Goods and Related Services (LGRS) is to briefly describe and identify the quantity of each of the Goods and Related Services that the Purchaser requires the Bidder to supply. As a part of the Schedule of Supply, the LGRS constitutes a Contract document and is a part of the Contract. The Purchaser must prepare the LGRS and include it as a part of the Schedule of Supply.

If the Goods and Related Services are grouped in lots, the Purchaser must state whether Bidders are permitted to submit Bids for individual lots or not.

[Alternative 1. Insert: “The Goods and Related Services are grouped in lots. Bids on individual lots are not permitted. Only Bids for lots can be accepted.”]

[Alternative 2. Insert: “The Goods and Related Services are grouped in lots. Bidders shall have the option of submitting Bids for one, any combination, or all of the lots. Lots shall not be further subdivided for the purpose of bidding.”]

BOQ/LGRS and bidding documents should be authentic

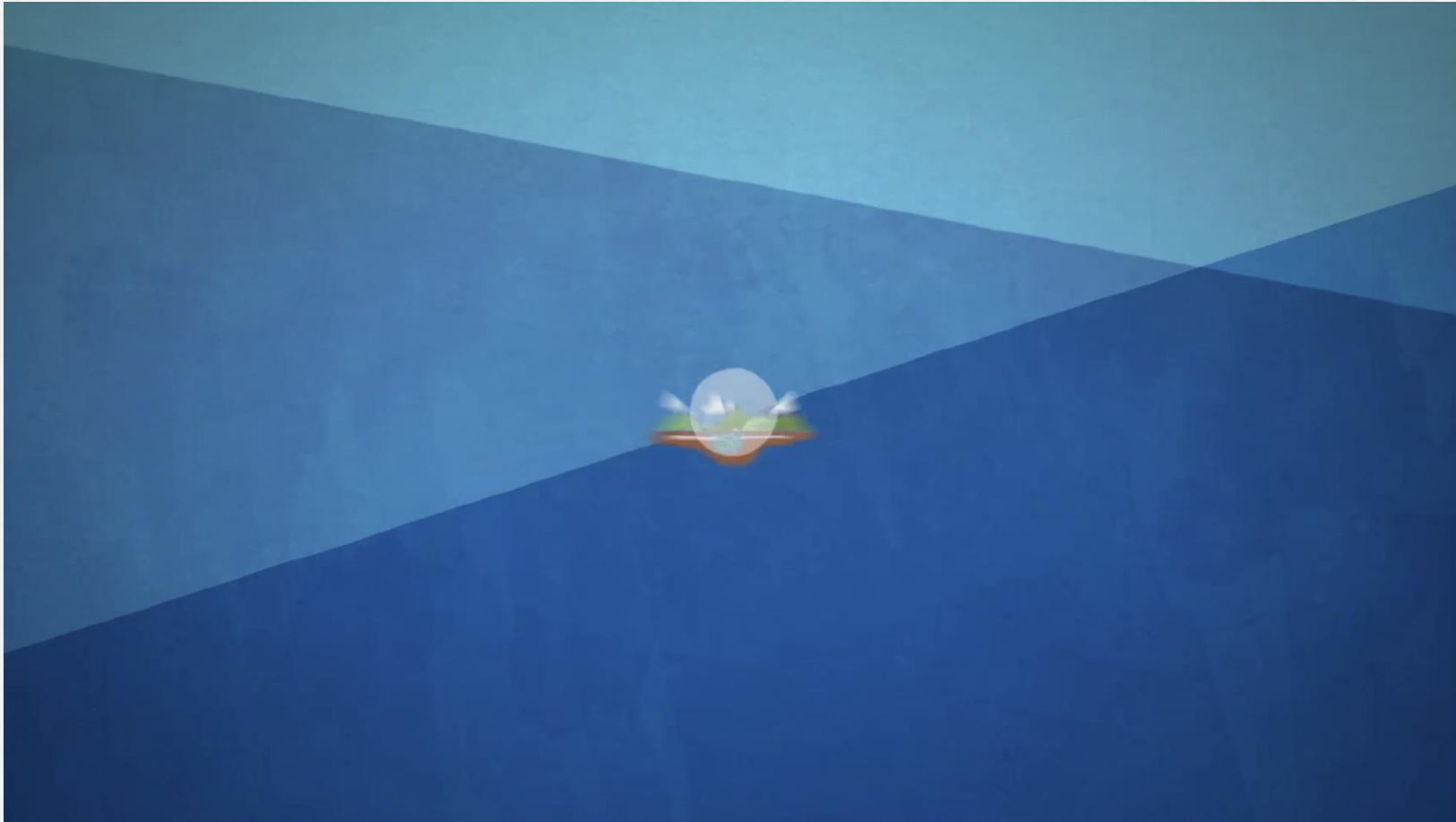
Proposed Personnel/Experts

FORM TECH-6B	
[Note to Consultant: Each Curriculum Vitae (CV) should have a maximum of five pages]	
CURRICULUM VITAE (CV) FOR INTERNATIONAL OR NATIONAL EXPERTS	
1.	I understand that any willful misstatement herein may lead to my disqualification or dismissal, if engaged.
2.	
<hr/>	
_____ [Signature of expert or authorized representative of the firm] ⁹	
Date: _____ Day/Month/Year	
Full name of authorized representative	

Fake CVs or credentials

Consider sample verification of submitted CVs with the experts





Break Time

(10 mins)



Identifying and Mitigating Risks

ADB's Anticorruption Framework



Promoting efficient, effective, accountable, and transparent public administration including good governance and capacity building



Supporting anticorruption efforts in the region through quality dialogue with the DMCs



Ensuring that ADB projects and staff adhere to the highest ethical standards



ADB defines **corruption** as the **abuse of public or private office for personal gain**

Steps in Performing a Risk Assessment



Conduct Integrity Due Diligence



Identify the Risk



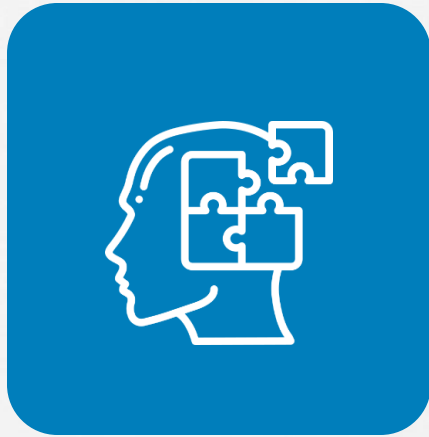
Can You Mitigate the Risk?

I. Recognizing and Reducing Risk

- Red Flags

- **Due Diligence**

Process of checking the accuracy of information of a business or individual prior to, during, and after engaging in a contract and informs risk mitigation



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

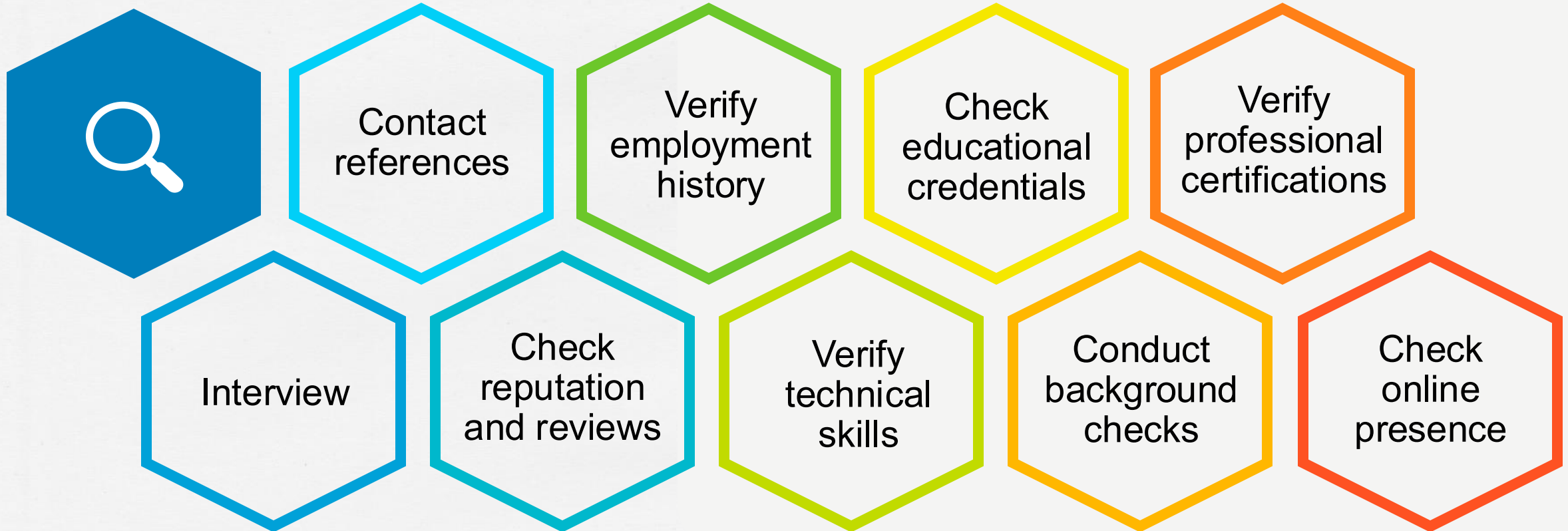


Approach to ethics
and compliance

Conduct Due Diligence



Conduct Due Diligence



Conduct Due Diligence: Searching Techniques

Use:

Specific Keywords

Jonathan vs Jonathan **Kazakhstan engineer**

And

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

Quotation Marks

“Kazakhstan road project”

Or

education **OR** training

Minus Operator (-)

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

Conduct Due Diligence: Searching Techniques

Others:



Asterisk (*)
as a wildcard



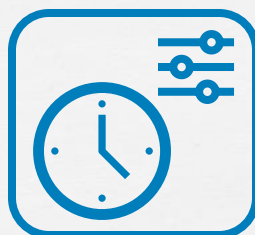
Site-specific
searches



Advanced
search options



Related
searches



Time filters



Google Scholar



Reverse image
search

Conduct Due Diligence: Important Areas

Potential Risk Flags



Bribery, corruption



Fraud, embezzlement



Money laundering, terrorist financing



Criminal convictions

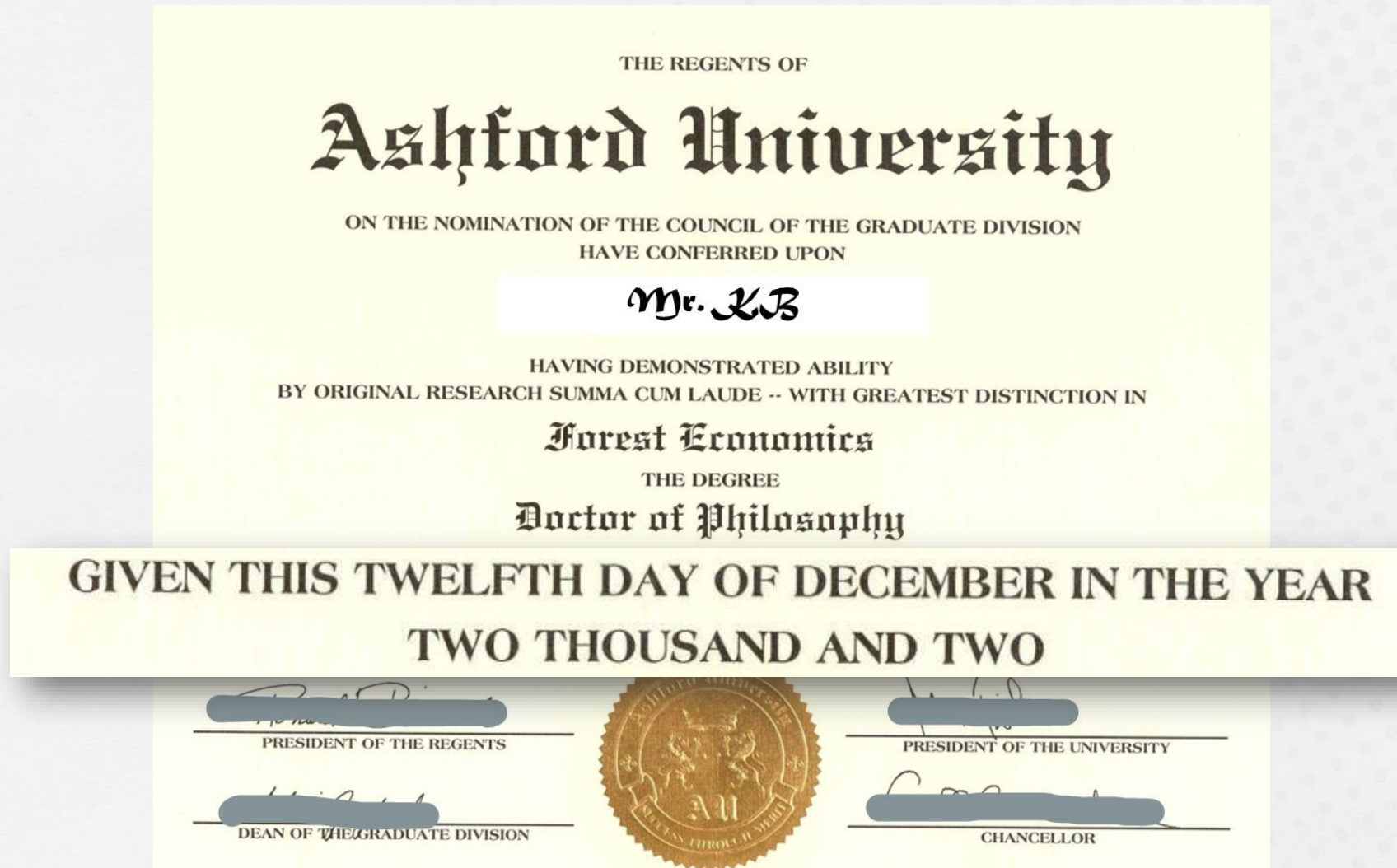


Illegal or disreputable activities



Break Time

(1 hour and 15 mins)





Ashford
UNIVERSITY™

ADB

NO PhD programmes

OUR MISSION

HISTORY

ACCREDITATIONS AND ASSOCIATIONS

ASSESSMENT

UNIVERSITY DATA

LEADERSHIP

BOARD OF TRUSTEES

ASHFORD ON TV

INSTITUTIONAL REVIEW BOARD

CONTACT US

Our History

2005

Bridgepoint Education, Inc., a higher education organization, acquired the institution in 2005, and its name was changed to Ashford University®.

Ashford University began in 2005, and any degrees issued prior to that year are not actually degrees.

Executing agencies (EAs) are Responsible for Sanctions Screening

Goods and Works

Prequalification

Technical BER

Financial BER

Contract
Award

Withdrawal
Applications

Contract
Variations/
Modifications

Consulting Services

Shortlisting

Technical
Proposals

Financial
Proposals

Contract
Award

Withdrawal
Applications

Contract
Variations/
Modifications

Conducting Due Diligence: Debarment Checks

 <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:

- 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.

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

Conducting Due Diligence: Debarment Checks

 **ASIAN DEVELOPMENT BANK**

[Home](#) [ADB Debarment and Suspension Register](#) [Resources](#) [Other Sanctions Lists](#) [Contact Us](#)

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3. If you have problems submitting the online application, please download the **Application Form**, complete it and email to integrity@adb.org.

 <http://sanctions.adb.org>

Other Information

- Application
- Temporary Suspension
- Debarment Period
- Contract Variations

Sign-up here

Manual form available

Conducting Due Diligence: Debarment Checks

ADB ASIAN DEVELOPMENT BANK

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

Login Sign Up

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

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

ADB



ASIAN DEVELOPMENT BANK

[Home](#)
[ADB Debarment and Suspension Register](#)
[Resources](#)
[Other Sanctions Lists](#)
[Contact Us](#)


Complete ADB Debarment and Suspension Register

Entity Type
Sanction Type
Nationality
Cross-Debarred

Entity Type	Name	Address	Sanction Type	Other Name / Logo	Nationality	Effect Date / Lapse Date	Grounds	Changes Made on
-------------	------	---------	---------------	-------------------	-------------	--------------------------	---------	-----------------




Search names using the search bar



Avoid including common terms when searching

"Ltd", "Company", "LLC"

Example: Use "A2Z" when searching for A2Z Waste Management



Remove leading terms such as "M/S, or M/S." from company names

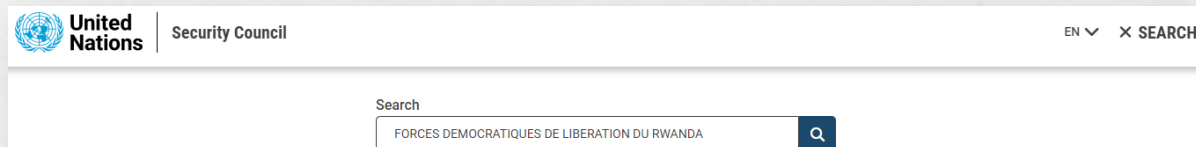
Page 1 of 3

<< < > >>

United Nations Security Council Sanctions: Obligations



United Nations Security Council Sanctions

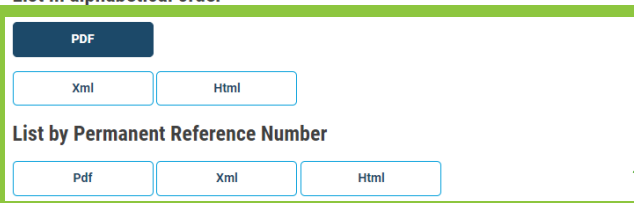


United Nations Security Council Consolidated List

- 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

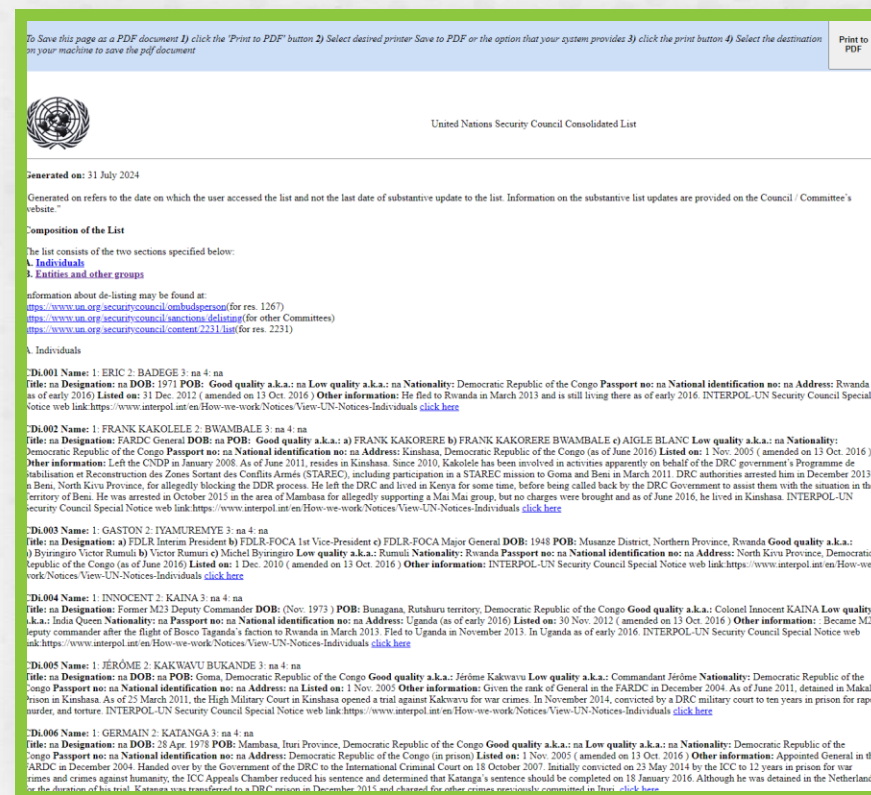
List in alphabetical order



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.



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>

Steps in Performing a Risk Assessment



**Conduct Integrity Due
Diligence**



Identify the Risk



**Can You Mitigate the
Risk?**

Risk Identified → Risk Mitigation

1. ADB debarred and UNSC sanctioned entities/individuals are trying to bid for a project

They are not eligible for contract, and bid will be rejected. OAI should be notified that an ADB debarred entity tried to bid for a project.

2. What if in your project, one contractor has adverse media relating to allegations of fraud/corruption in a previous project?

Enhanced monitoring and implementation of controls to ensure that corruption cannot happen in the project

Risk Identified → Risk Mitigation

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They are not eligible for contract, and bid will be rejected. OAI should be notified that an ADB debarred entity tried to bid for a project.

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Enhanced monitoring and implementation of controls to ensure that corruption cannot happen in the project

Group Exercises

Case study: The firm that prepared the project is in a COI situation



- A firm would like to submit an EOI for an EA-administered consulting assignment for detailed engineering design and project readiness support consulting services.
- The firm was part of a JV that ADB previously hired under a TA to develop and prepare the proposed project. Services rendered included preparing a feasibility level design for each subproject, and to prepare the TOR for the design and implementation consultants for the ensuing project.
- The consultant's key deliverables for the (new) consulting assignment include, among others, a review of available studies and preparing a concept design that improves, upgrades, and fills gaps in the existing feasibility studies.

Case study: The firm that prepared the project is in a COI situation

Issue: Whether or not there is COI considering the firm's involvement in preparing the project



Finding: There is COI

- Consultant was tasked under the new contract's TOR to review, assess, and evaluate the feasibility study prepared under a related TA
- The firm (if hired) will verify, update, improve, upgrade, and fill the gap in it's JV's work/output produced under the previous TA
- Firm is placed in a position where its interests could improperly influence its performance of its contractual obligations

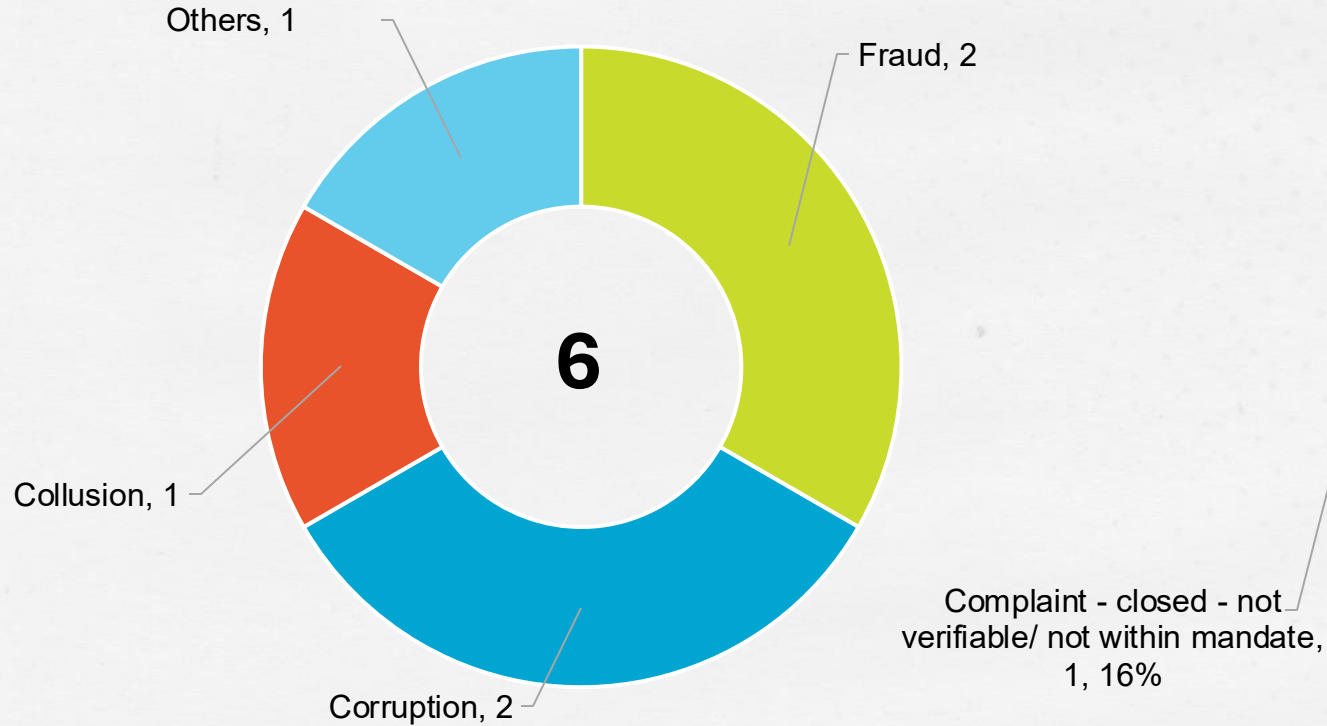
Break Time

(15 mins)

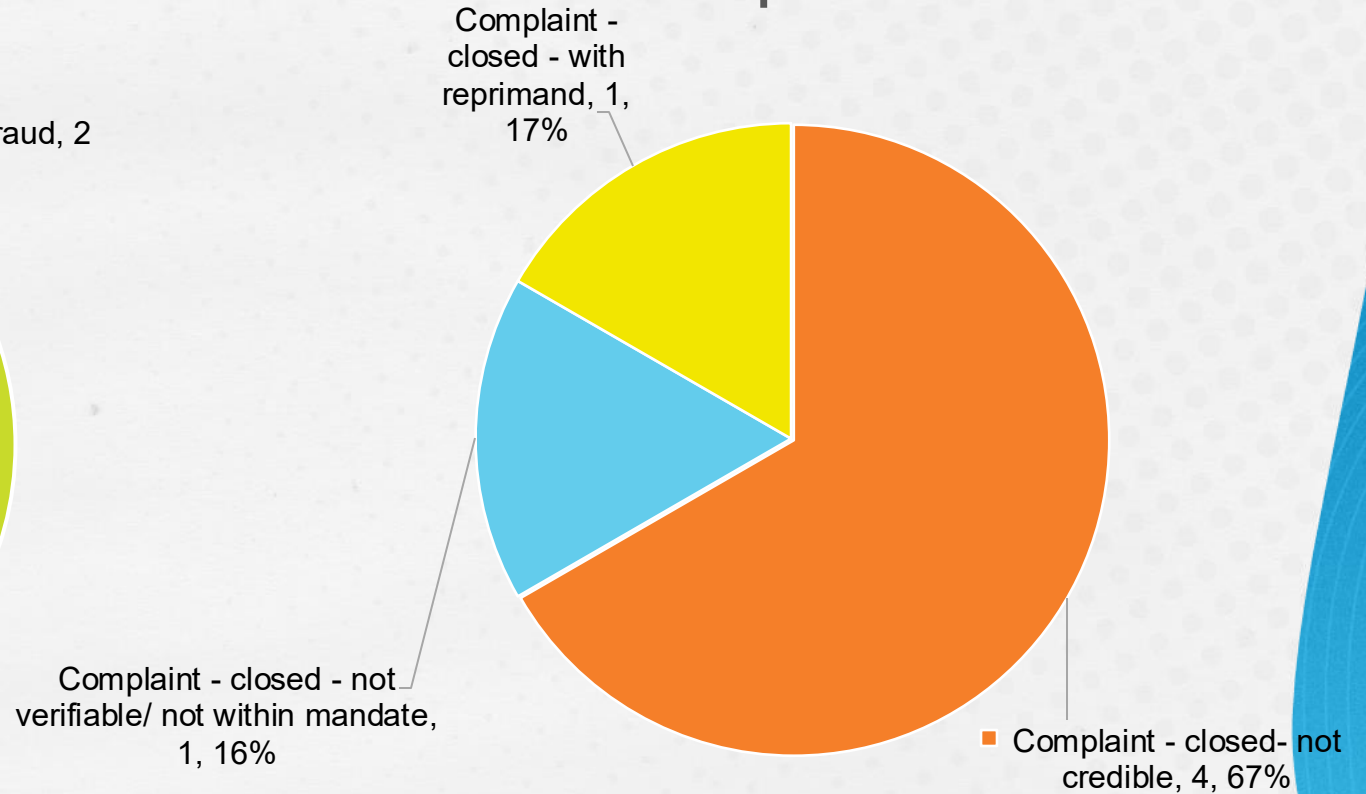
II. ADB Debarments and Suspensions

Completed OAI cases in Kazakhstan since 2014

By Integrity violation



Disposition



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

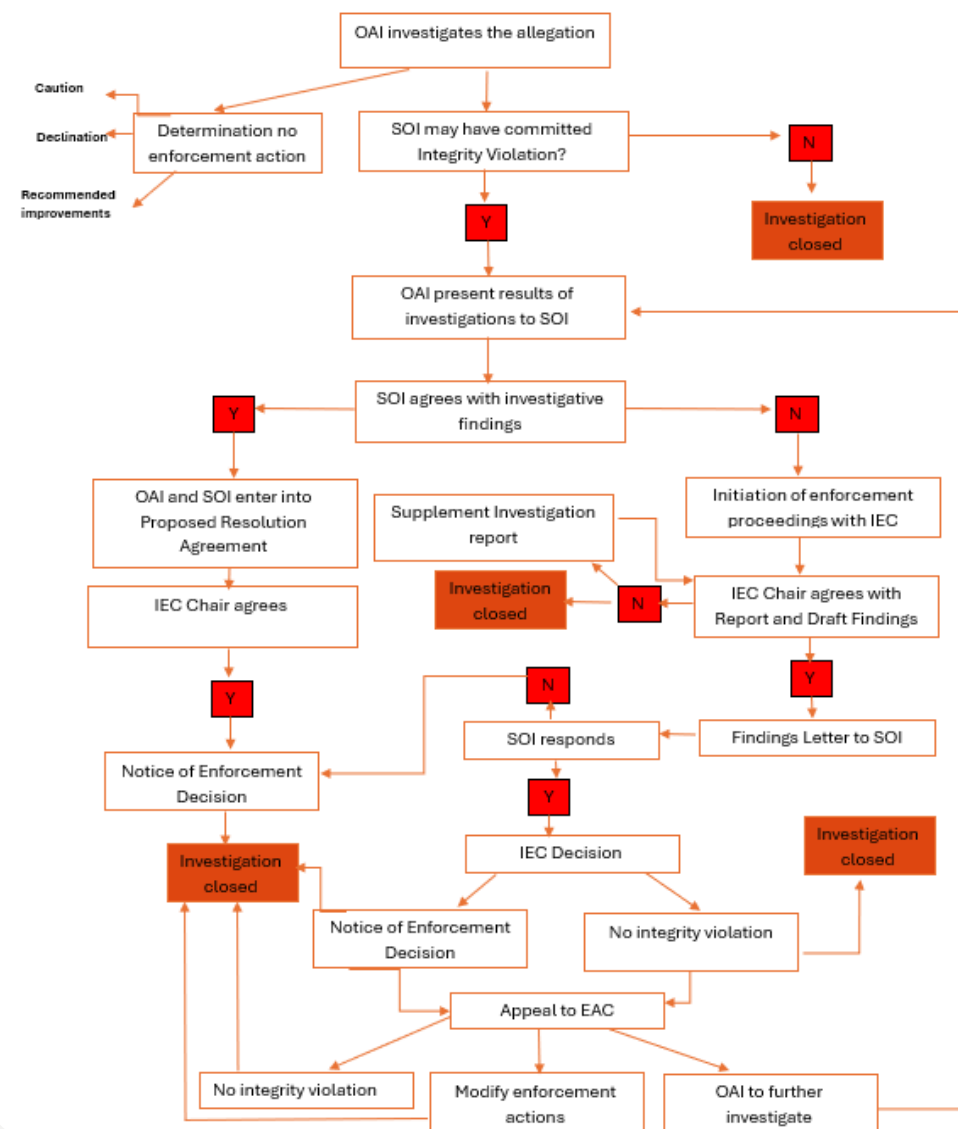
External Investigations Team (EIT)

- Dedicated team created in 2018
- Investigates integrity violations by external parties in ADB-related activities
- Engage retainers to conduct inquiries
- Issues show cause letters and investigation reports under the Investigation and Enforcement Framework, replacing previous findings letters and Integrity Oversight Committee memos
- Proposes/recommends remedial action to SOIs/IEC
- Shares knowledge
- Collaborates with and supports CIT and IIT
- Processes reinstatement applications
- Business integrity programs



External Investigation Process

- Conversion to conclusion – 18 months
- Outcomes could be caution, declination, recommended improvements, enforcement and disclosure actions, Unsubstantiated or disproven,
- Identification of local retainers
- Show cause letters, Investigation reports
- MDB guidelines on treatment of corporate groups



Impact While Under Debarment

Current
contacts



**MAY
CONTINUE**

Contract
variations



**OAI
ENDORSEMENT**

Future tenders



NOT PERMITTED

Reinstatement



NOT AUTOMATIC

Consequences of Integrity Violations in ADB-financed Projects



Debarment of firms or individuals



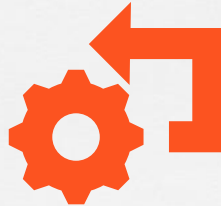
Suspension of the loan or grant allocations



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



III. Building A Culture of Integrity

Champion Anticorruption and Integrity



- Ensure counterparties are not **sanctioned**
- Verify at every step
- Raise integrity concerns where found

Group Activity: Develop Action Plans to Fight Corruption

Each team will be provided time to:

1. Identify areas where improvements can be made to fight corruption.
2. Determine the actions and resources required to improve these areas.
3. Identify opportunities where you and ADB can collaborate in the fight against corruption.



25 minutes

Integrity is Everybody's Business



3

Integrity is
everybody's business.

Integrity Risk Management is everyone's responsibility.



Do not assume that someone else is doing it.

Recap



Know your partner



Leverage technology for due diligence



Identify and mitigate risks, support your partner in mitigating risks



EAs/IAs to:

- i. Sign up for access to ADB's complete Debarment and Suspension Register
- ii. Do the sanctions checks



Report integrity violations to OAI

Other Resources



Frequently Asked Questions on ADB Sanctions

Scan the QR code to read



Integrity Risks and Red Flags Series

Scan the QR code or visit bit.ly/ADBintegritylessons



ADB eLEARN

Detecting and Preventing Integrity Violations in ADB Projects

Take the course now!

Scan the QR code or visit: bit.ly/ADB-DPIV

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.



English



Russian

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www.adb.org/integrity



@anticorruptionandintegrity



anticorruption@adb.org
integrity@adb.org



@adb_oai



+63-2-8632 5004



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Report integrity violations :

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

Thank you!



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