

The Integrity Learning Series

Anticorruption and Integrity Training

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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.

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**

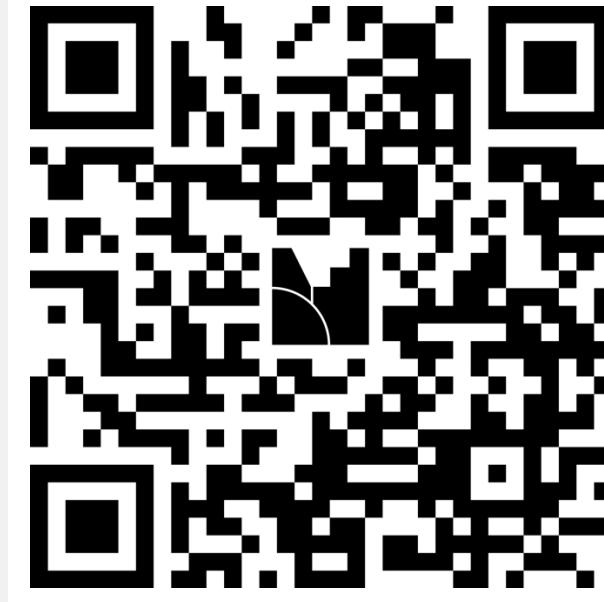


**Raising awareness, monitoring,
advocating for reform**

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

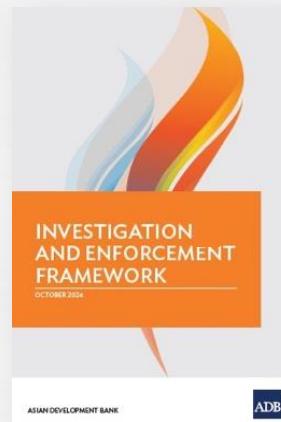
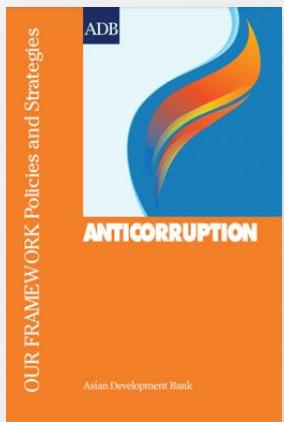


Conducting **ethical** business practices,
implementing integrity measures

ADB's Anticorruption and Integrity Framework

ADB

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



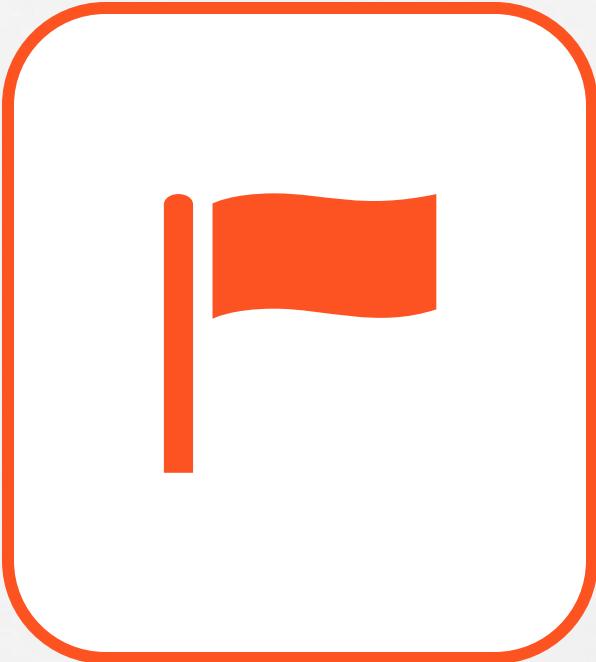
Identifying and Mitigating Integrity Risks



I. Recognizing and Reducing Risk

- **Red Flags**
- Due Diligence





Be alert to the
red flags of
integrity risks.

What are Integrity Risks?



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.

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

ADB

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)





Letter of Bid

NOTE
The bidder must

NOTES

1. The bidder must accomplish the Bid Submission Sheet and address.
2. To be used for Single-Stage Bidding.

To: [insert address]
We, the undersigned, declare that we have no conflict of interest with the bidder's complete name

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]

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	
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:

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's name below:

Joint Venture Partner:

Each Bidder must fill out this form separately and provide the Joint Venture Partner:

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

1. List of Goods and Related Services

The purpose of the List of Goods and Related Services (LGRS) is to briefly describe and identify 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. [Insert: “The Purchaser must state whether Bidders are permitted to submit Bids for individual lots or not. If Bids for individual lots are not permitted, the Purchaser must state whether Bidders are permitted to submit Bids for one, any combination, or all of the lots. Lots shall not be further subdivided for the purpose of bidding.”]

[Alternative 1. Insert: “The Goods and Related Services are grouped in lots. Bids on individual lots are not permitted. Only Bids for one, any combination, or all of the lots shall 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.”]

Proposed Personnel/Experts

ADB

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 misrepresentation or omission on this form or any document submitted in connection therewith may lead to my disqualification or dismissal, if engaged.

2.

[Signature of expert or authorized representative of the firm]¹⁹

Date: _____

Day/Month/Year

Full name of authorized representative

Proposed personnel/experts should be aware and available

Fake CVs or credentials

ADB



Consider sample verification of submitted CVs with the experts

John Mark
Software Engineer

Contact Details

- +1 2345 67
- example@gmail.com
- Address

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 2018 – Dec 2019
Company – Country

- Develop and test software for various clients.
- Collaborate with cross-functional teams to ensure quality and timely delivery.

Software Engineer Jan 2015 – Dec 2018
Company – Country

- Designed and 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

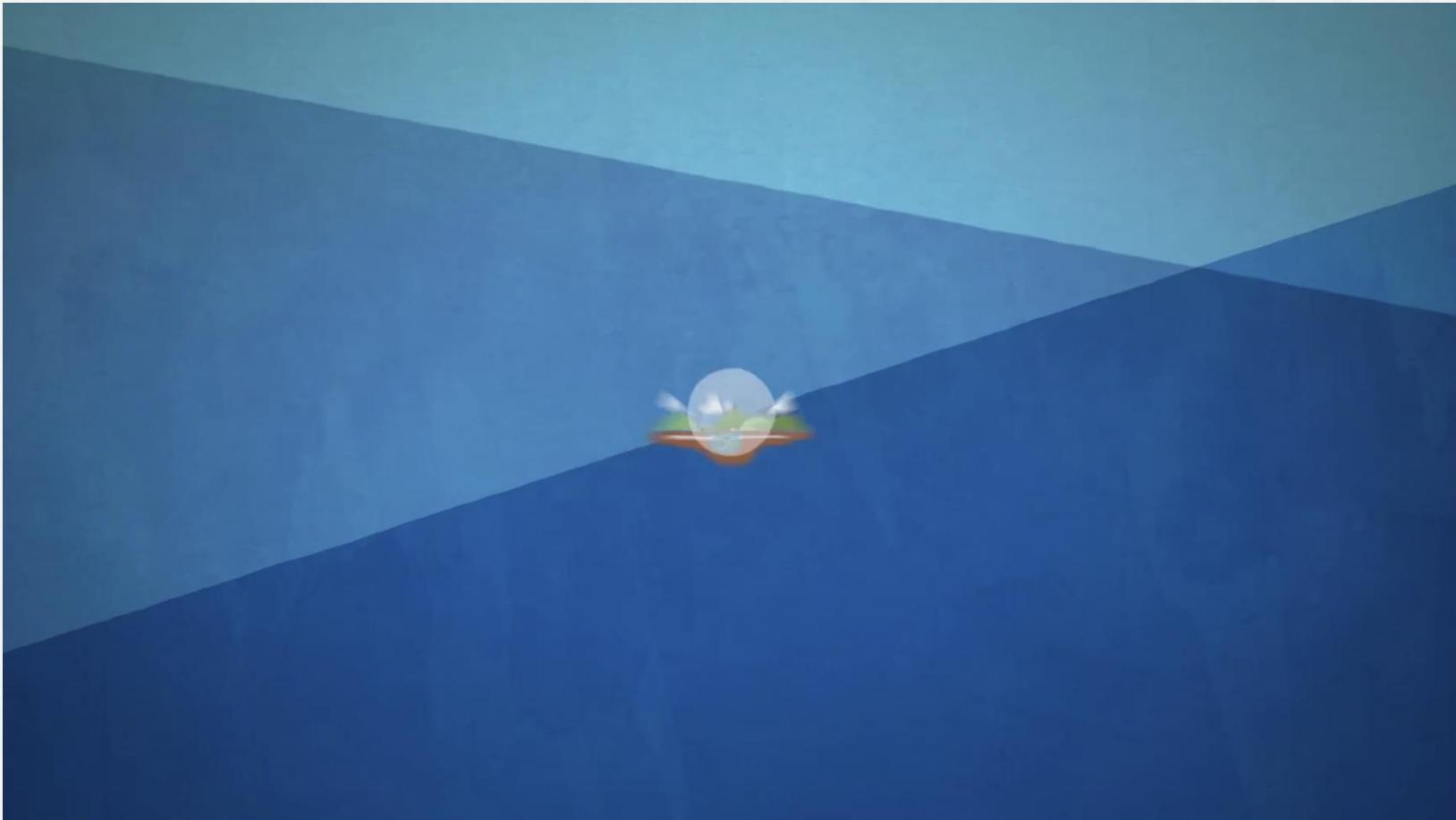
Masters in Software Engineering Jan 2009 – Dec 2010
Location

Bachelors in Computer Science Jan 2015 – Dec 2018
Location

Languages

- English: Fluent
- French: Intermediate





Break Time

(10 mins)





Identifying and Mitigating Risks

ADB's Anticorruption Framework

ADB



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

ADB



**Conduct Integrity Due
Diligence**



Identify the Risk



**Can You Mitigate the
Risk?**

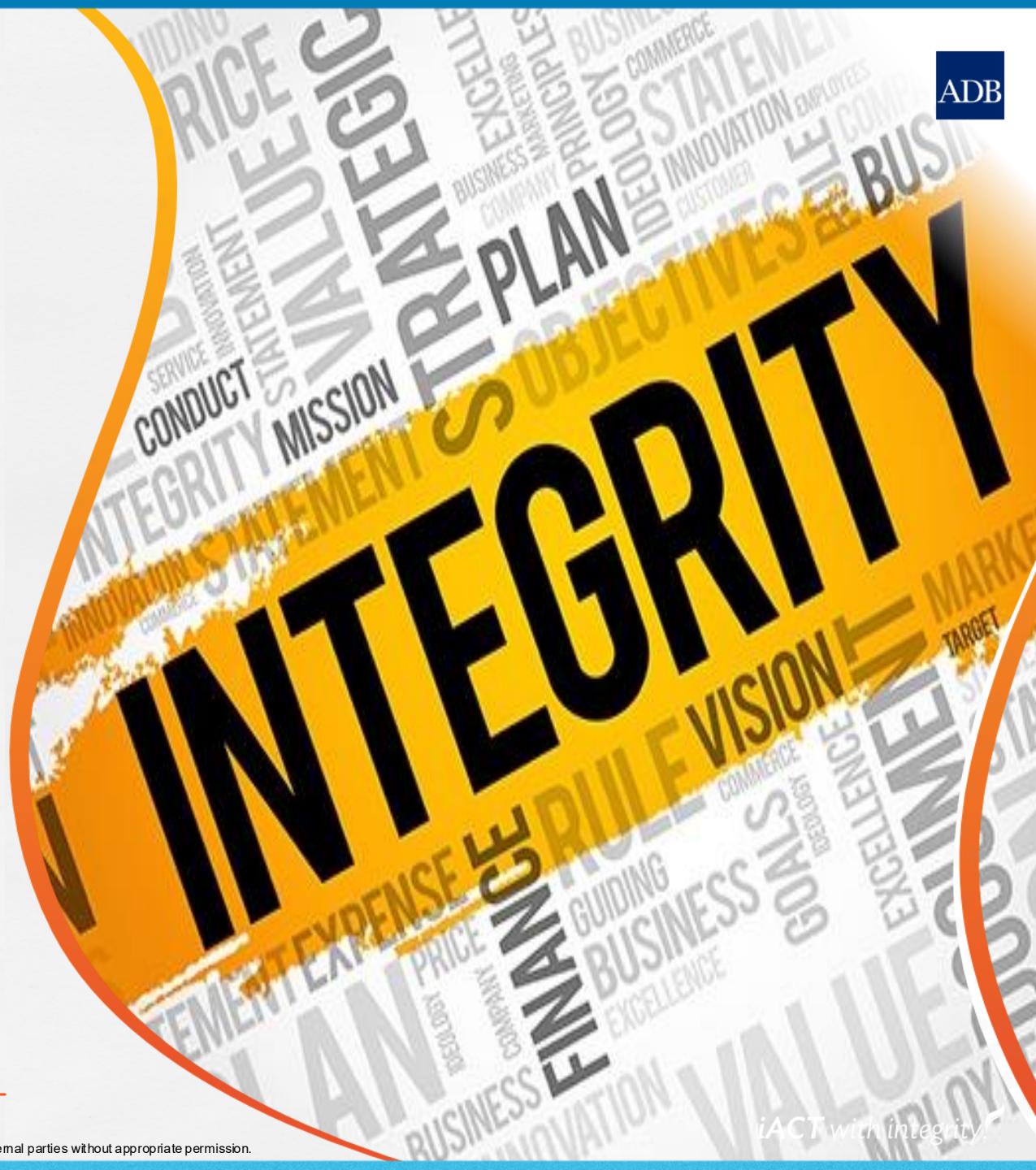
I. Recognizing and Reducing Risk

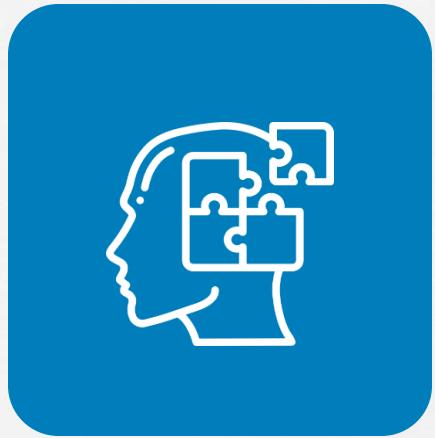
- Red Flags
- **Due Diligence**



Perform integrity 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

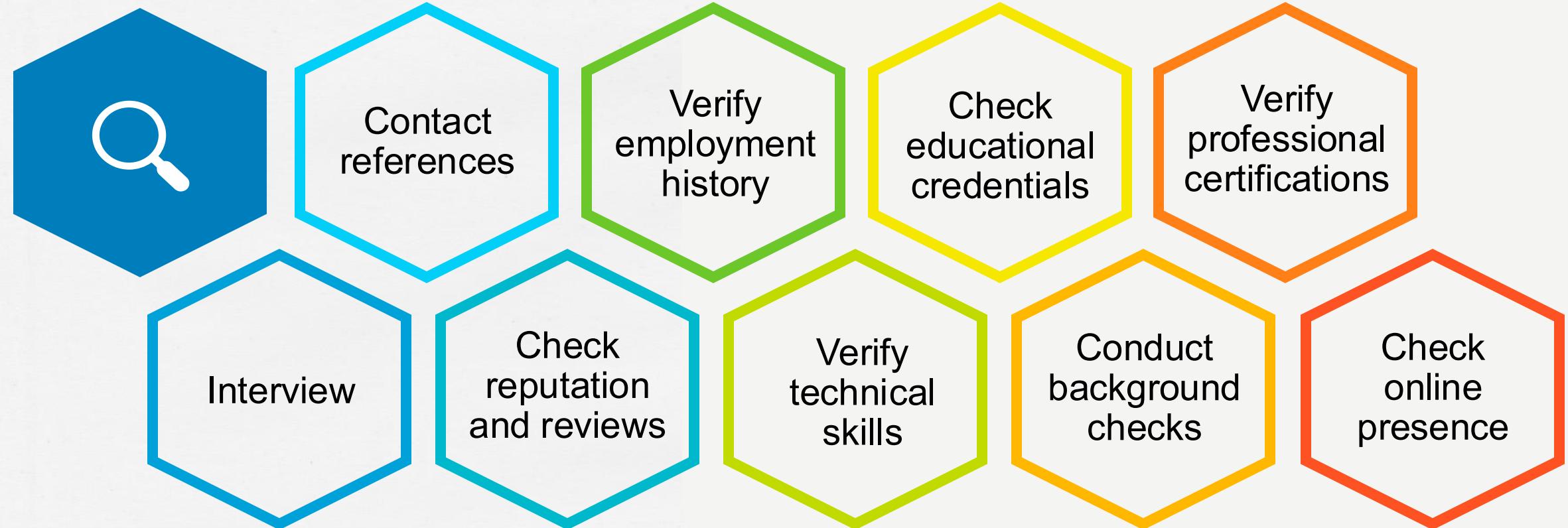
Conduct Due Diligence

ADB



Conduct Due Diligence

ADB



Conduct Due Diligence: Searching Techniques

ADB

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

ADB

Others:



Asterisk (*)
as a wildcard



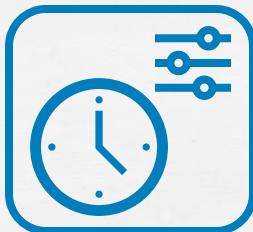
Site-specific
searches



Advanced
search options



Related
searches



Time filters



Google Scholar



Reverse image
search

Conduct Due Diligence: Important Areas

ADB

Potential Risk Flags



Bribery, corruption



Fraud, embezzlement



Money laundering,
terrorist financing



Criminal convictions



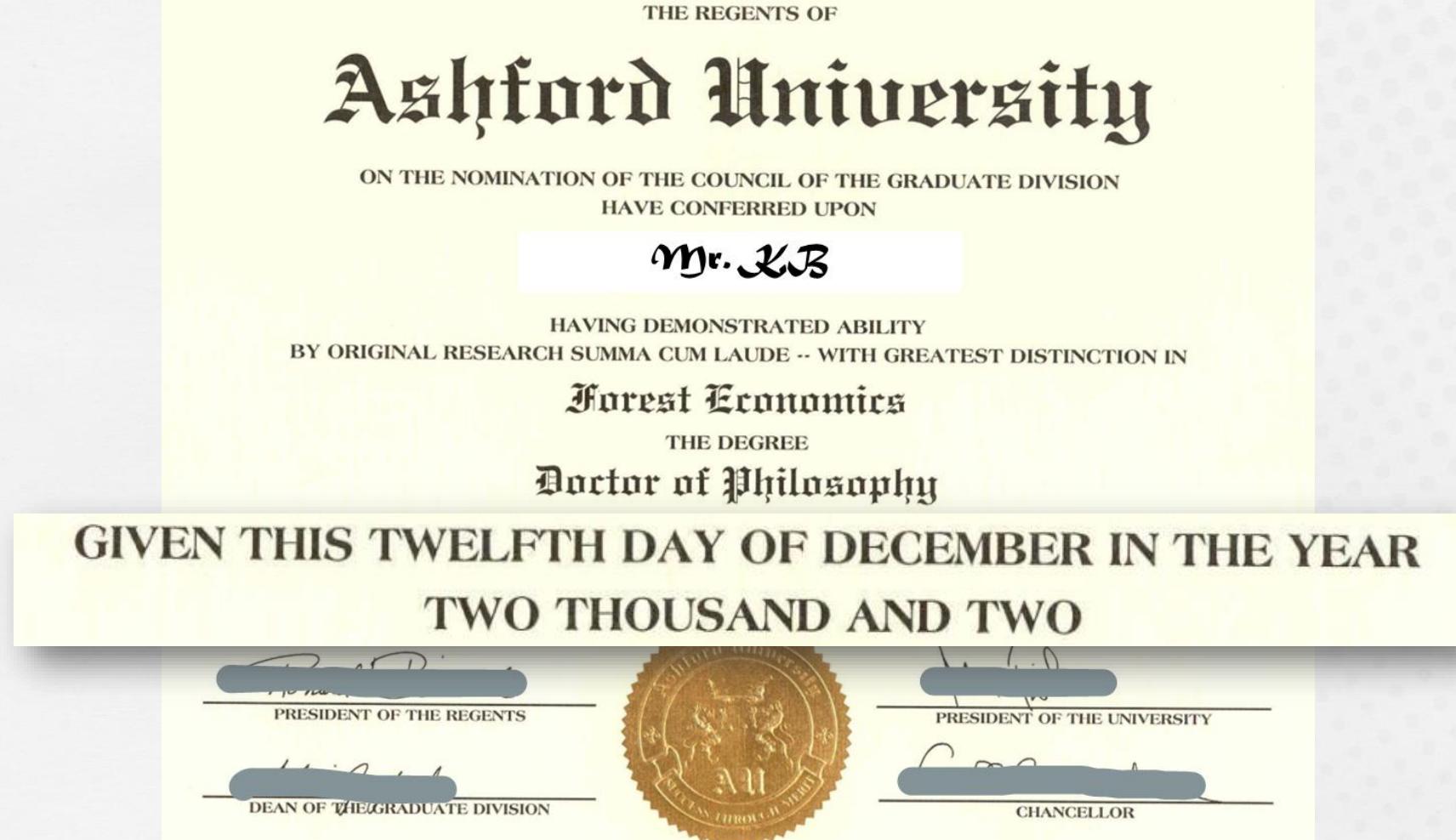
Illegal or disreputable activities



Break Time

(1 hour and 15 mins)







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

or

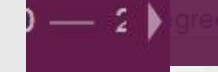
na

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



Consulting Services



Conducting Due Diligence: Debarment Checks

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](#)

AUTHORIZED USERS ONLY
Complete ADB Debarment and Suspension Register
[View Non-Publicly Disclosed Debarment](#)

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

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

<http://sanctions.adb.org>

Conducting Due Diligence: Debarment Checks

ADB

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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

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

Search Functionality

ADB

ADB ASIAN DEVELOPMENT BANK

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

Complete ADB Debarment and Suspension Register

Search Entity Type Sanction Type Nationality Cross-Debarred

Entity Type Name ↑ Address Sanction Type Other Name / 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 100 << < > >>

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.

Search options

[Link to United Nations Security Council 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

ADB

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

ADB

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

Group Exercises

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

ADB



- 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.

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 its 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)*



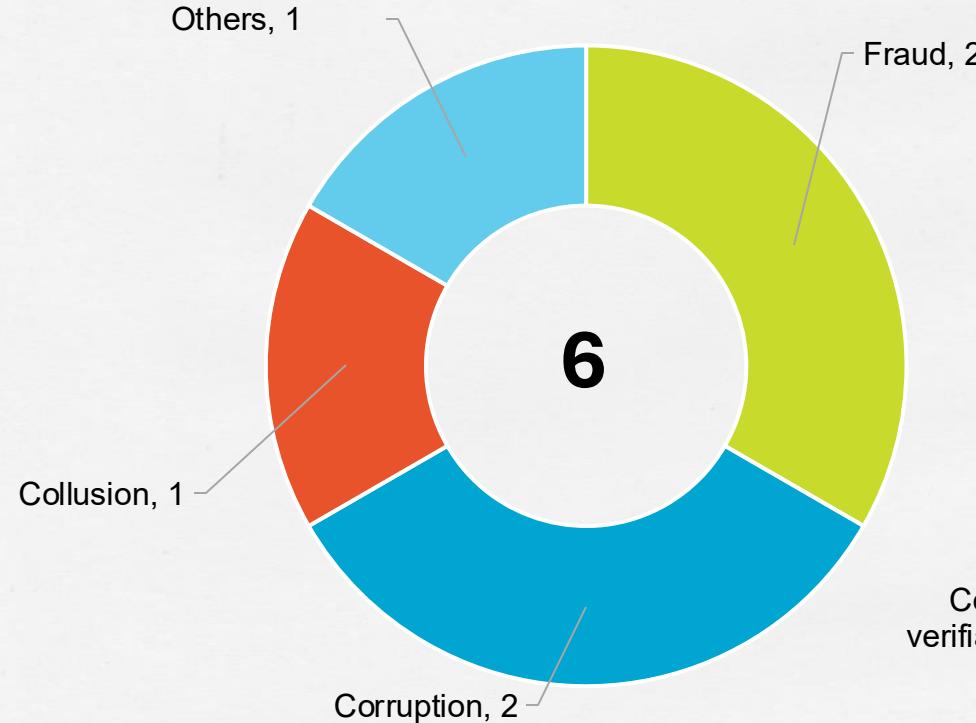
II. ADB Debarments and Suspensions



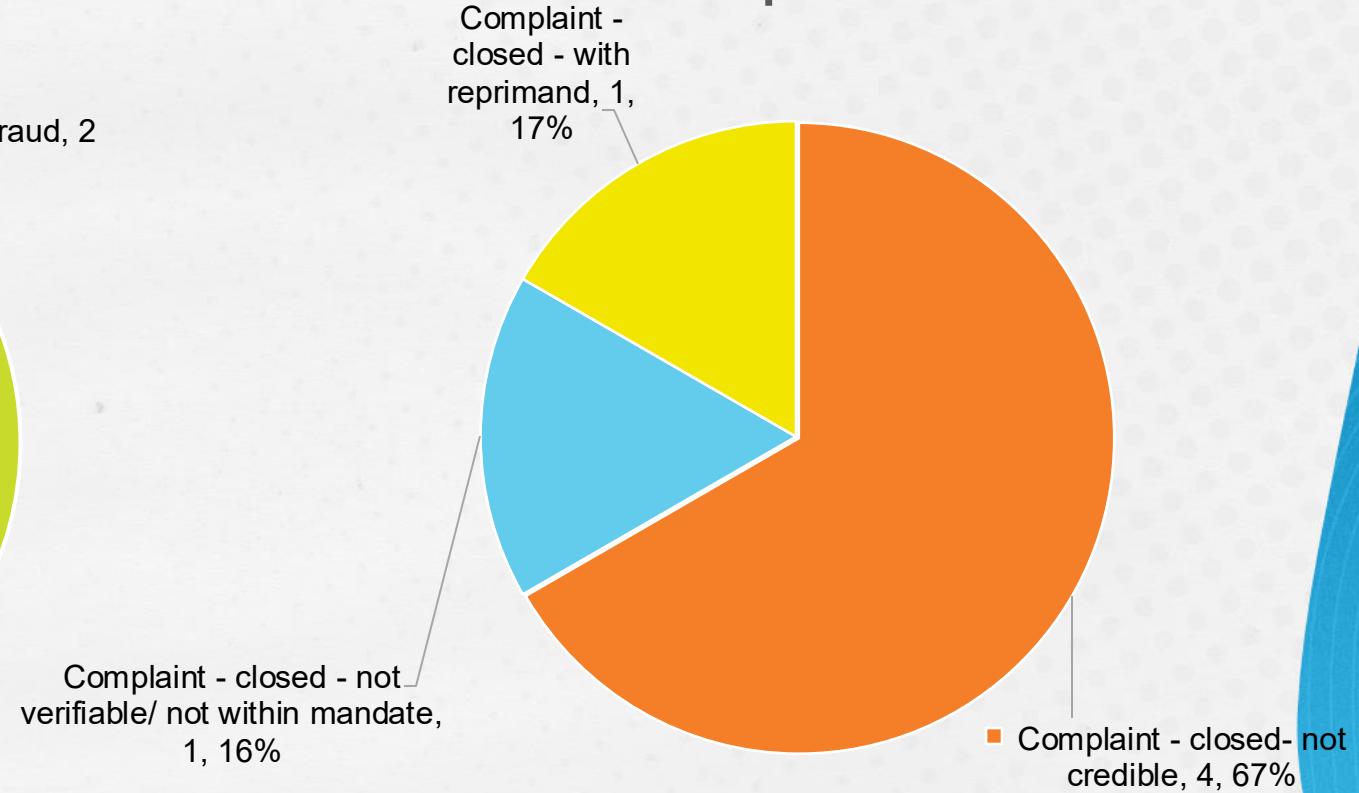
Completed OAI cases in Kazakhstan since 2014

ADB

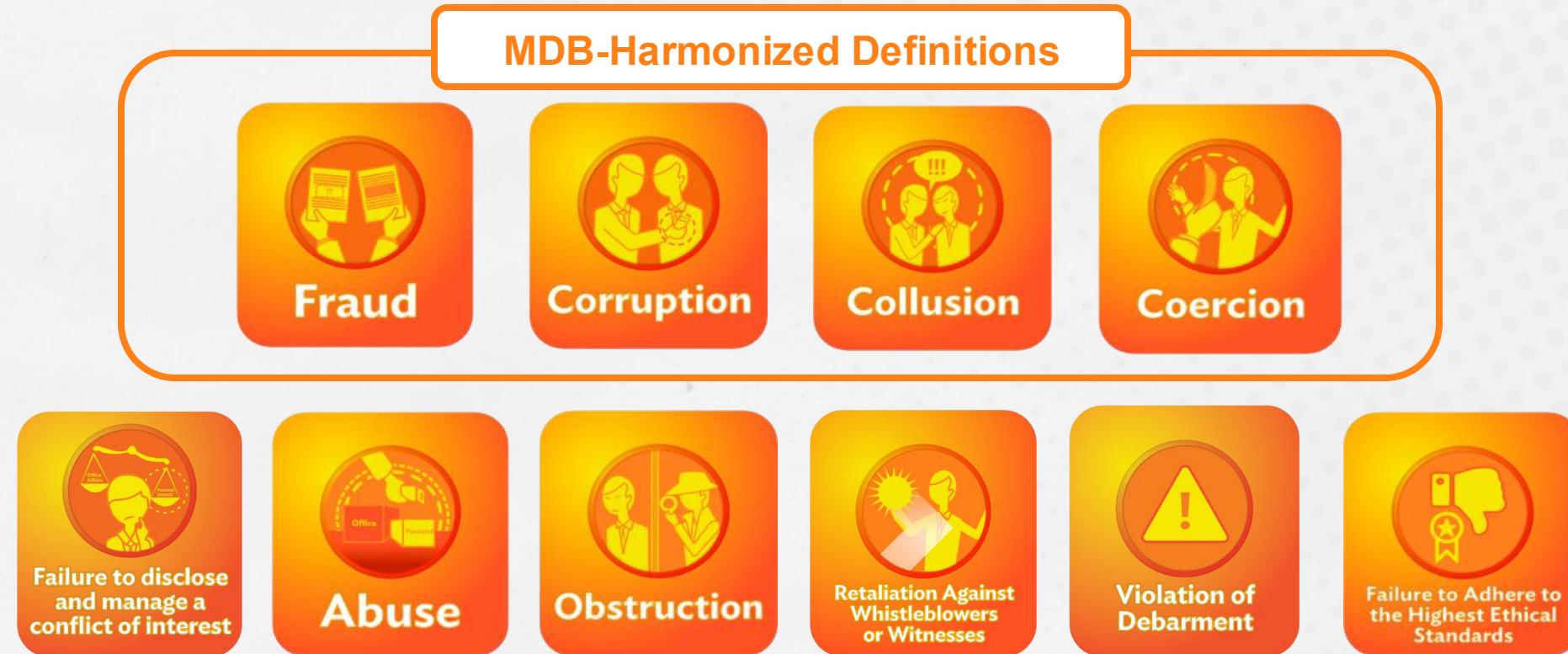
By Integrity violation



Disposition



Integrity Violations



External Investigations Team (EIT)

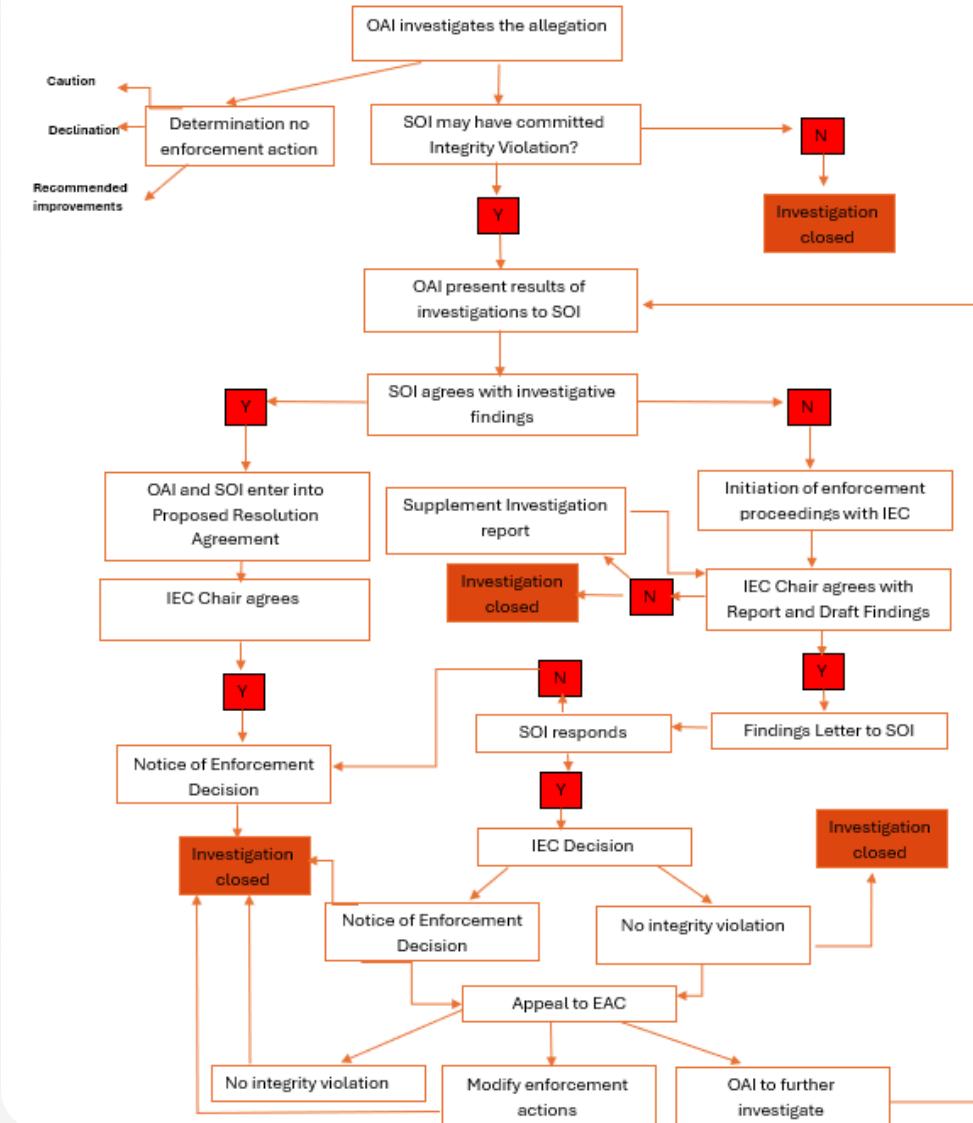
ADB

- 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

ADB

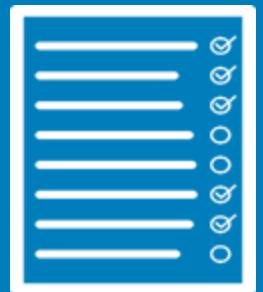
Current
contacts



Contract
variations



Future tenders



Reinstatement



MAY
CONTINUE

OAI
ENDORSEMENT

NOT PERMITTED

NOT AUTOMATIC

Consequences of Integrity Violations in ADB-financed Projects

ADB



Debarment of firms
or individuals



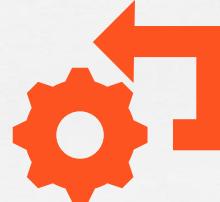
Suspension of the loan
or grant allocations



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



European Bank
for Reconstruction and Development



IDB
Inter-American
Development Bank



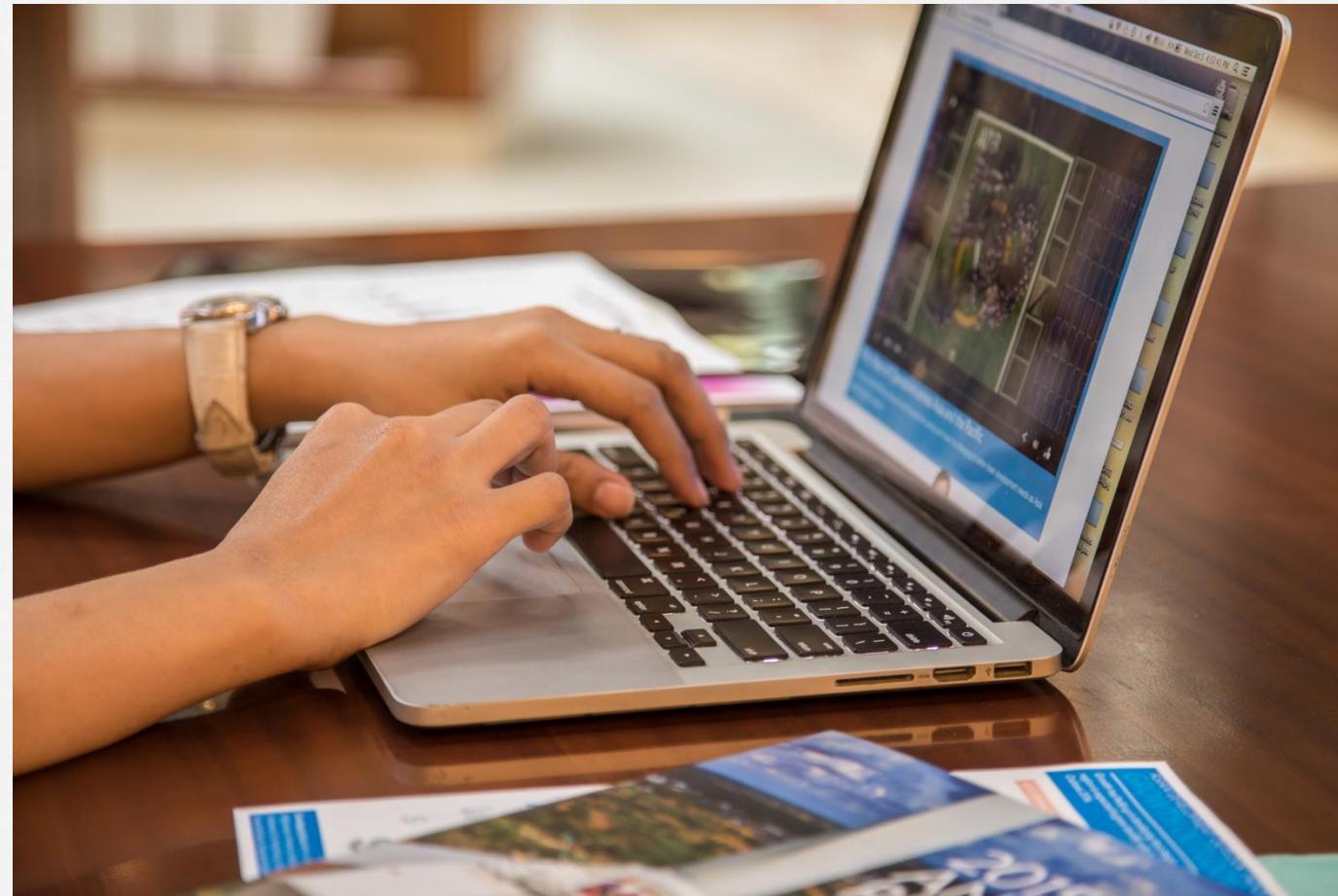
WORLD BANK GROUP

III. Building A Culture of Integrity



Champion Anticorruption and Integrity

ADB



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

Group Activity: Develop Action Plans to Fight Corruption

ADB

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.



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

The graphic features a yellow chevron shape pointing downwards. Inside the chevron, the ADB eLEARN logo is displayed, consisting of the letters 'ADB' in a white sans-serif font inside a dark blue square, followed by the word 'eLEARN' in a blue sans-serif font with a small blue square icon to its right. Below the chevron, the title 'Detecting and Preventing Integrity Violations in ADB Projects' is written in a large, bold, red sans-serif font. The background of the graphic is a stylized illustration of four diverse professionals (two men, two women) in business attire, standing against a background of orange and blue abstract shapes.

Take the course now!

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

ADB eLEARN

**Detecting and Preventing
Integrity Violations in
ADB Projects**

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

Scan

Office of Anticorruption and Integrity

ADB



www.adb.org/integrity



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ADB Anticorruption and Integrity



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



Thank you!



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