



## The Integrity Learning Series

# Anticorruption and Integrity Training

**January Sanchez**  
Principal Integrity Specialist

**Maria Dionelle Facun**  
Senior Integrity Officer

17 June 2025  
Bishkek, Kyrgyz Republic

# 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](https://menti.com) and enter code **6580 2480**

## Mentimeter Scenario 1: RESULTS

ADB

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](https://menti.com) and enter code **6580 2480**

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

ADB

EASTERN EUROPE AND CENTRAL ASIA

## KYRGYZSTAN

### Score

**25**/100

### Rank

**146**/180

### Score change

 -1 since 2023

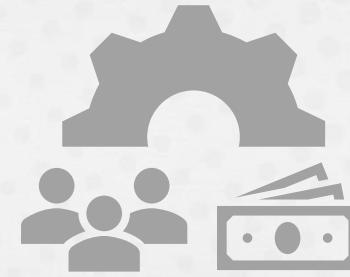
# Roles and Responsibilities of different stakeholders

---





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](https://menti.com) and enter code **6580 2480**

## Mentimeter Scenario 2: RESULTS

ADB

### 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](https://menti.com) and enter code **6580 2480**



**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](https://menti.com) and enter code **6580 2480**

## Mentimeter Scenario 3: RESULTS

ADB

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

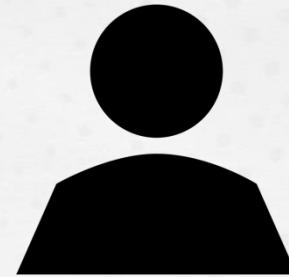
- A. Raise awareness about the importance of integrity and its impact on society.
- B. Monitor and advocate for ethical practices in government and businesses.
- C. Provide platforms for dialogue and collaboration on anti-corruption initiatives.



Scan the QR Code or go to [menti.com](https://menti.com)  
and enter code **6580 2480**



## Reporting corruption

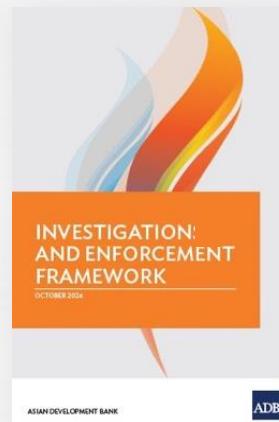
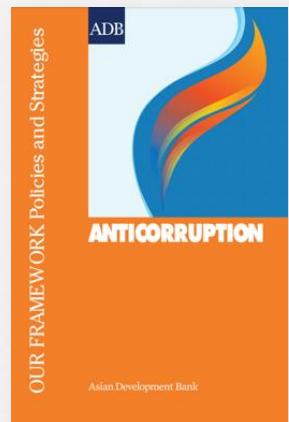


Conducting **ethical** business practices,  
**implementing** integrity measures

# 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.



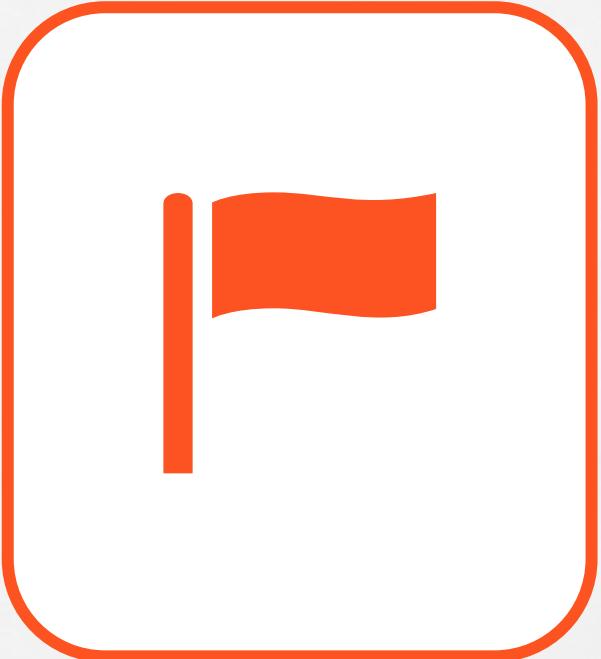
# Identifying and Mitigating Integrity Risks



# 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)

# 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, we need to make sure that you all have a safe and smooth bidding season. We hope that you all have a great time and a lot of fun to be a part of the bidding season. We hope that you all have a great time and a lot of fun to be a part of the bidding season.

**New Download Feature:**  
We have some exciting news for you! We have added a new feature to our website that allows you to download files directly from the website. You can now download files directly from the website without having to go through the bidding process. This makes it easier for you to download files and bid on projects.



**New Download Feature:**  
We have some exciting news for you! We have added a new feature to our website that allows you to download files directly from the website. You can now download files directly from the website without having to go through the bidding process. This makes it easier for you to download files and bid on projects.

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

We hope you all had a nice bidding season and a big congrats to all of our single bid. However, we need to make sure that you all have a safe and smooth bidding season. We hope that you all have a great time and a lot of fun to be a part of the bidding season. We hope that you all have a great time and a lot of fun to be a part of the bidding season.

We hope you all had a nice bidding season and a big congrats to all of our single bid. However, we need to make sure that you all have a safe and smooth bidding season. We hope that you all have a great time and a lot of fun to be a part of the bidding season. We hope that you all have a great time and a lot of fun to be a part of the bidding season.

ADB Irrigation and  
Water Project

**BIDDING IS  
NOW OPEN**



## 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

ADB

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

Bid-

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

constitution

Bidder's Information	
Bidder's legal name	
In case of a Joint Venture, legal name of each partner	
Bid-	
Information on incorporation documents, shareholders, owners and managers, authorized representative, JV partners, legal address and country of constitution should be in order	
constitution	

# 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:

## 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 the supply of goods and/or services in US dollars, converted into US dollars of exchange at the end of the financial 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's name below:

**Should meet the bid qualification requirements**

## 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:

## 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. The Purchaser must state whether Bidders are permitted to submit Bids for individual lots or not. 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 one, any combination, or all of the lots will 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 on this form or any other document submitted in connection therewith may lead to my disqualification or dismissal, if engaged.

2.

[Signature of expert or authorized representative of the firm]<sup>19</sup>

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

**Languages**

- English: Fluent
- French: Intermediate

**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 2020

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 2017

Company – Country

- Develop 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**

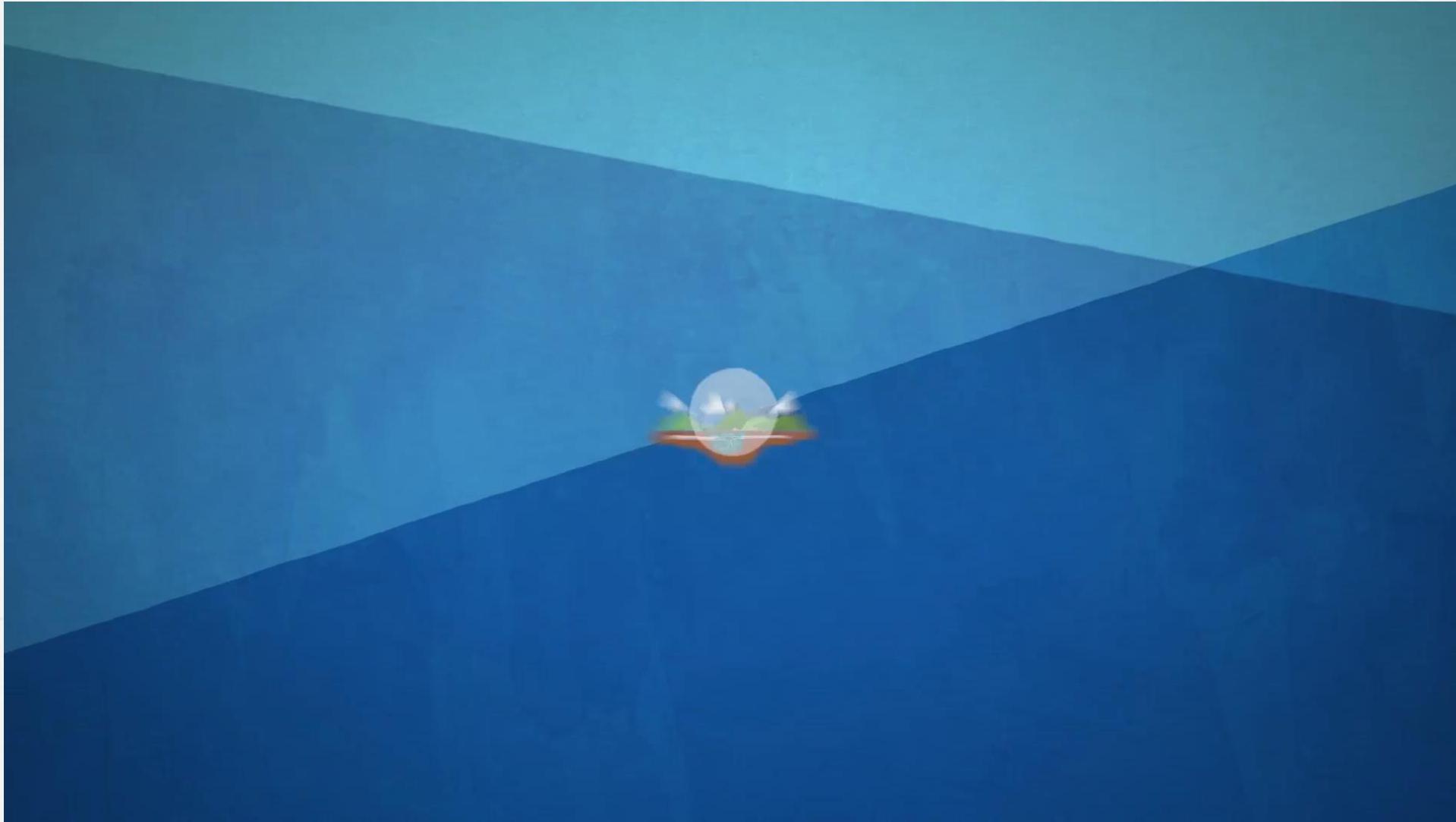
**Master's in Software Engineering** Jan 2019 – Dec 2020

Location

**Bachelor's in Computer Science** Jan 2015 – Dec 2018

Location





# 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?**

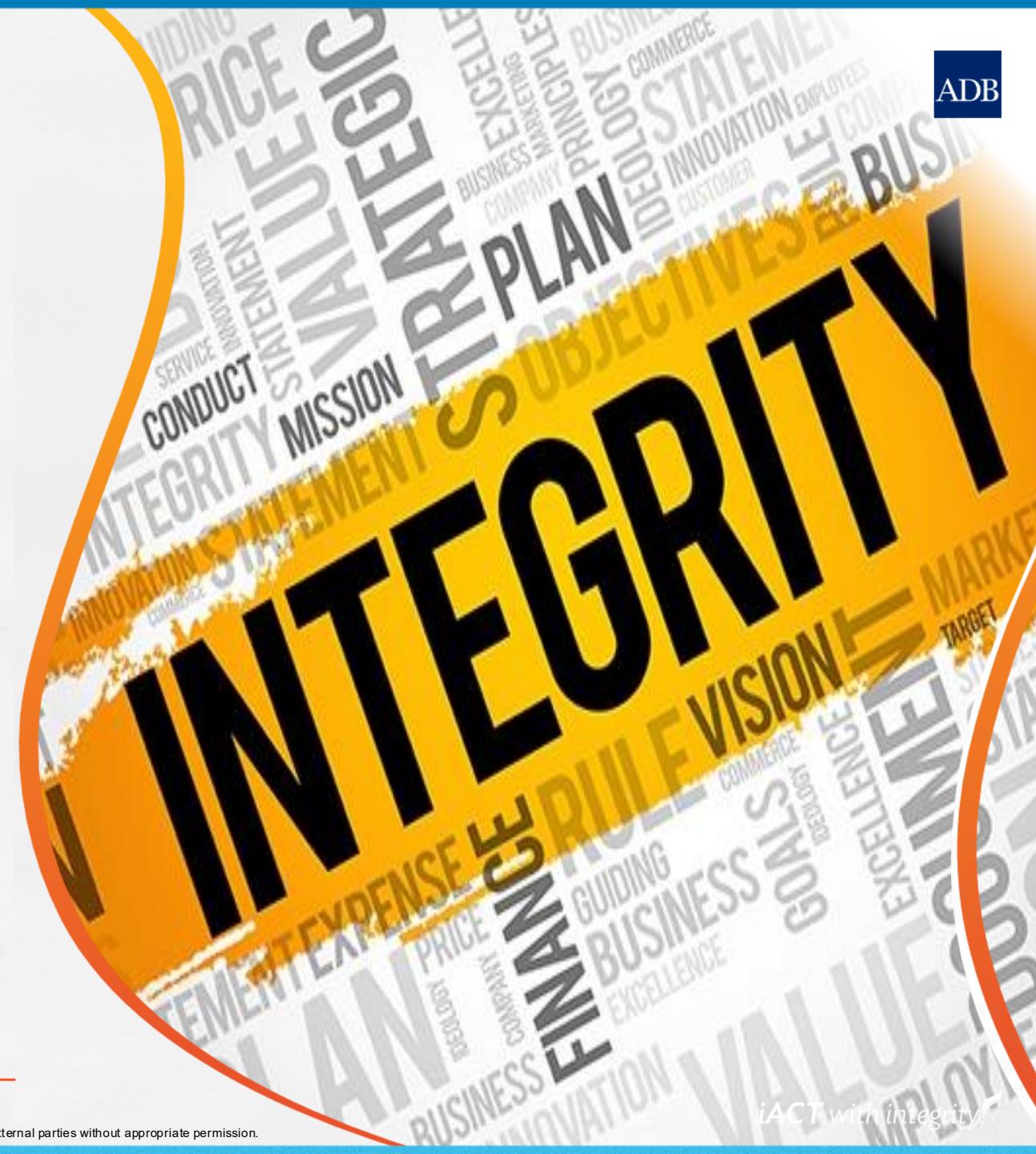
# I. Recognizing and Reducing Risk

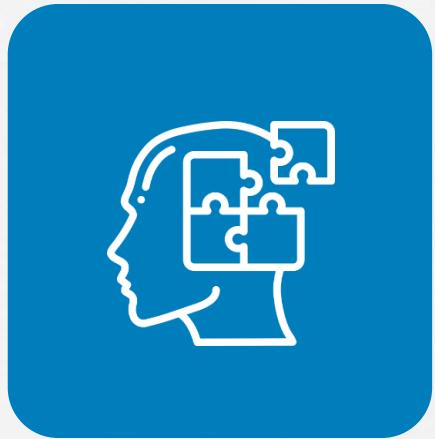
- Red Flags
- **Due Diligence**



# 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



# Conduct Due Diligence: Searching Techniques

ADB

## Use:

### Specific Keywords

Jonathan vs Jonathan **Kyrgyz engineer**

And

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

### Quotation Marks

“Kyrgyz road project”

Or

education **OR** training

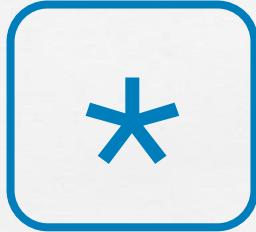
### Minus Operator (-)

“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



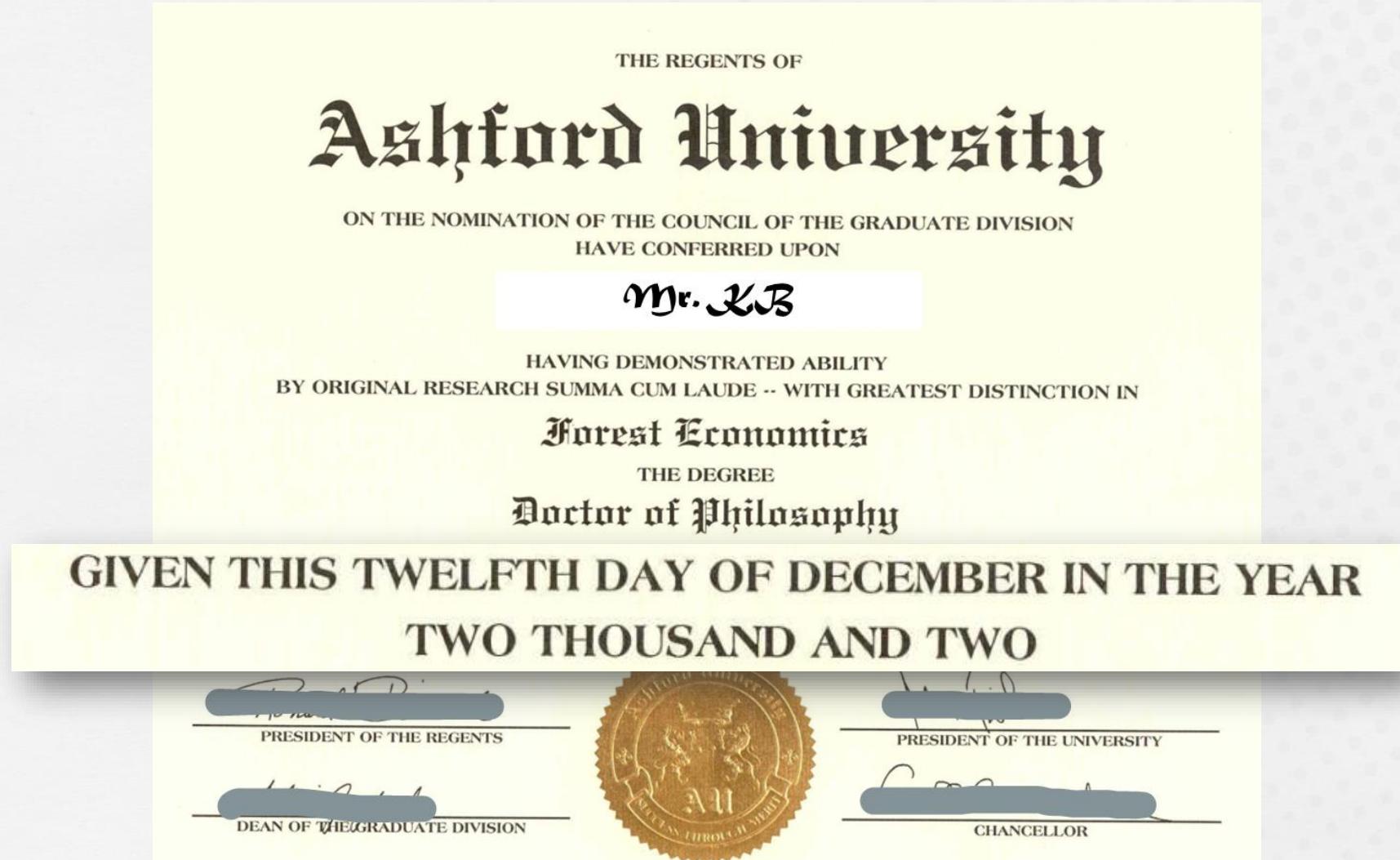
Illegal or disreputable activities



# 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

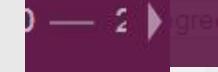
na

## 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](#)

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.

- For registered users, please proceed by [Login](#).
- If you're a [qualified user](#) requiring access to the complete sanctions list, please [Sign Up](#).
- 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).

# Conducting Due Diligence: Debarment Checks

ADB

**ADB Debarment and Suspension Register**

The following page lists the entities temporarily suspended and debarred by the Asian Development Bank (ADB), and those cross debarred by ADB in accordance with the Agreement for Mutual Enforcement of Debarment Decisions with other Multilateral Development Banks (MDBs). These entities are not eligible to participate in ADB-financed, -administered, or -supported activities.

**NO LOGIN REQUIRED**

Publicly Disclosed Debarment or Suspension

[View Publicly Disclosed Debarment or Suspension](#)

What you will see in this subregister:

- Debarments that have institutional considerations
- Debarments associated with the violation of a previous debarment
- Second and subsequent debarments
- Debarred entities (firms and individuals) who are uncontactable
- Cross debarred entities
- Subset of the ADB Debarment and Suspension register

**AUTHORIZED USERS ONLY**

Complete ADB Debarment and Suspension Register

[View Non-Publicly Disclosed Debarment](#)

What you will see in the register:

- Published Debarments
- Non-published Debarments
- Temporary suspension

How do I get access to this list?

This is a secure application operated by ADB for its official business. Only those given access to the application can access the list.

1. For registered users, please proceed by [Login](#).
2. If you're a [qualified user](#) requiring access to the complete sanctions list, please [Sign Up](#).
3. If you have problems submitting the online application, please download the [Application Form](#), complete it and email to [integrity@adb.org](mailto:integrity@adb.org).

**Sign-up here**

**Manual form available**

# Conducting Due Diligence: Debarment Checks

ADB ASIAN DEVELOPMENT BANK

Login Sign Up

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

## Application Form

Apply for access to Asian Development Bank full sanctions list:

Your Name\*  
First name \_\_\_\_\_ Middle name \_\_\_\_\_ Last name \_\_\_\_\_

Email Address\*  
\_\_\_\_\_

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

Address\*  
\_\_\_\_\_ Country  
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 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

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

##### 3. Individuals

**DI001** 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 Notice web link: <https://www.interpol.int/en/How-we-work/Notices-View-UN-Notices-Individuals> click here

**DI002** Name: 1: FRANK KAKOLEE 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: a 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 FARDC in January 2003 and became a member of the FARDC's 10th Division. He was accused of being a member of the FARDC's 10th Division and was arrested 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

**DI003** Name: 1: GASTON 2: IYAMUREMYE 3: na 4: na  
Title: na Designation: a) FDLR Interim President b) FDLR-FOCA 1st Vice-President c) FDLR-FOCA Major General DOB: 1948 POB: Musanze District, Northern Province, Rwanda Good quality a.k.a.: a) Biringiro Victor Rumali b) Victor Rumali c) Michel Biringiro 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

**DI004** 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: a National identification no: na Address: Uganda (as of early 2016) Listed on: 30 Nov. 2012 (amended on 13 Oct. 2016) Other information: Became M23 deputy commander after the flight of Bosco Tshabangu's faction to Rwanda in March 2013. Fleed to Uganda in November 2013. In Uganda as of early 2016. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices-View-UN-Notices-Individuals> click here

**DI005** Name: 1: JÉRÔME 2: KAKWU BUKANDE 3: na 4: na  
Title: na Designation: a) DOB: na POB: Goma, Democratic Republic of the Congo Good quality a.k.a.: Jérôme Kakwua Low quality a.k.a.: Commandant Jérôme Nationality: Democratic Republic of the Congo Passport no: a National identification no: na Address: na Listed on: 1 Nov. 2005 (amended on 13 Oct. 2016) 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 Kakwua 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

**DI006** Name: 1: GERMAIN 2: KATANGA 3: na 4: na  
Title: na Designation: a) DOB: na POB: na Nationality: 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: a National identification no: na Address: Democratic Republic of the Congo (in prison) Listed on: 12 Nov. 2005 (amended on 13 Oct. 2016) Other information: Appointed General in the FARDC in December 2004. Handled over by the Government of the DRC to the International Criminal Court on 18 October 2007. Initially convicted on 23 May 2014 by the ICC to 12 years in prison for war crimes and crimes against humanity; the ICC Appeals Chamber reduced his sentence and determined that Katanga's sentence should be completed on 15 January 2016. Although he was detained in the Netherlands for the duration of his trial, Katanga was transferred to a DRC prison in December 2015 and charged for other crimes previously committed in the DRC. click here

## 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

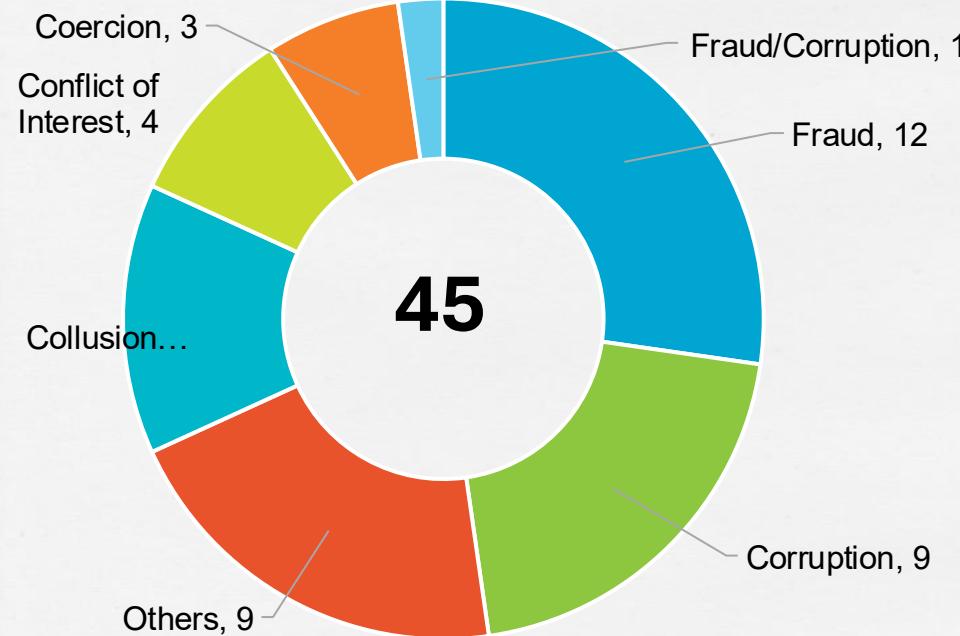
---



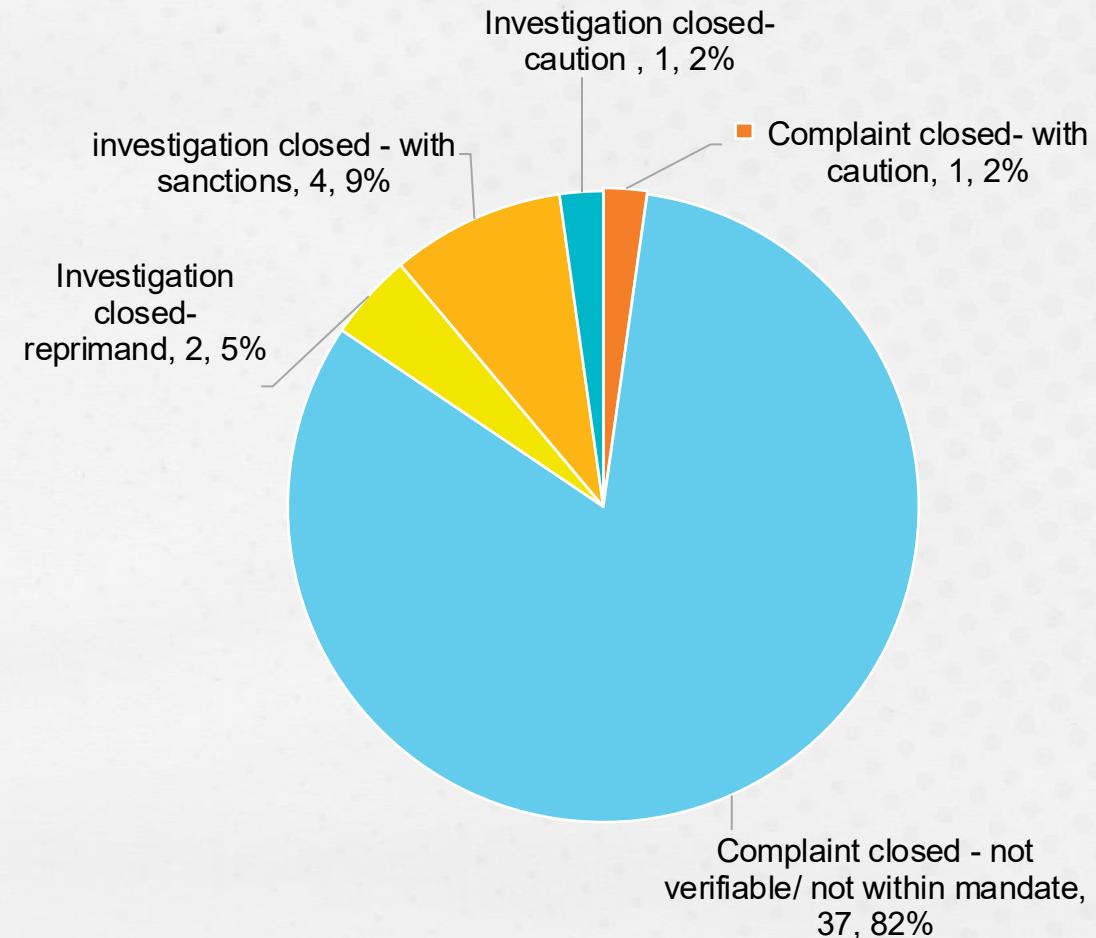
# Completed OAI cases in Kyrgyz Republic since 2014

ADB

## By Integrity violation



## Disposition



# Integrity Violations



# External Investigations Team (EIT)

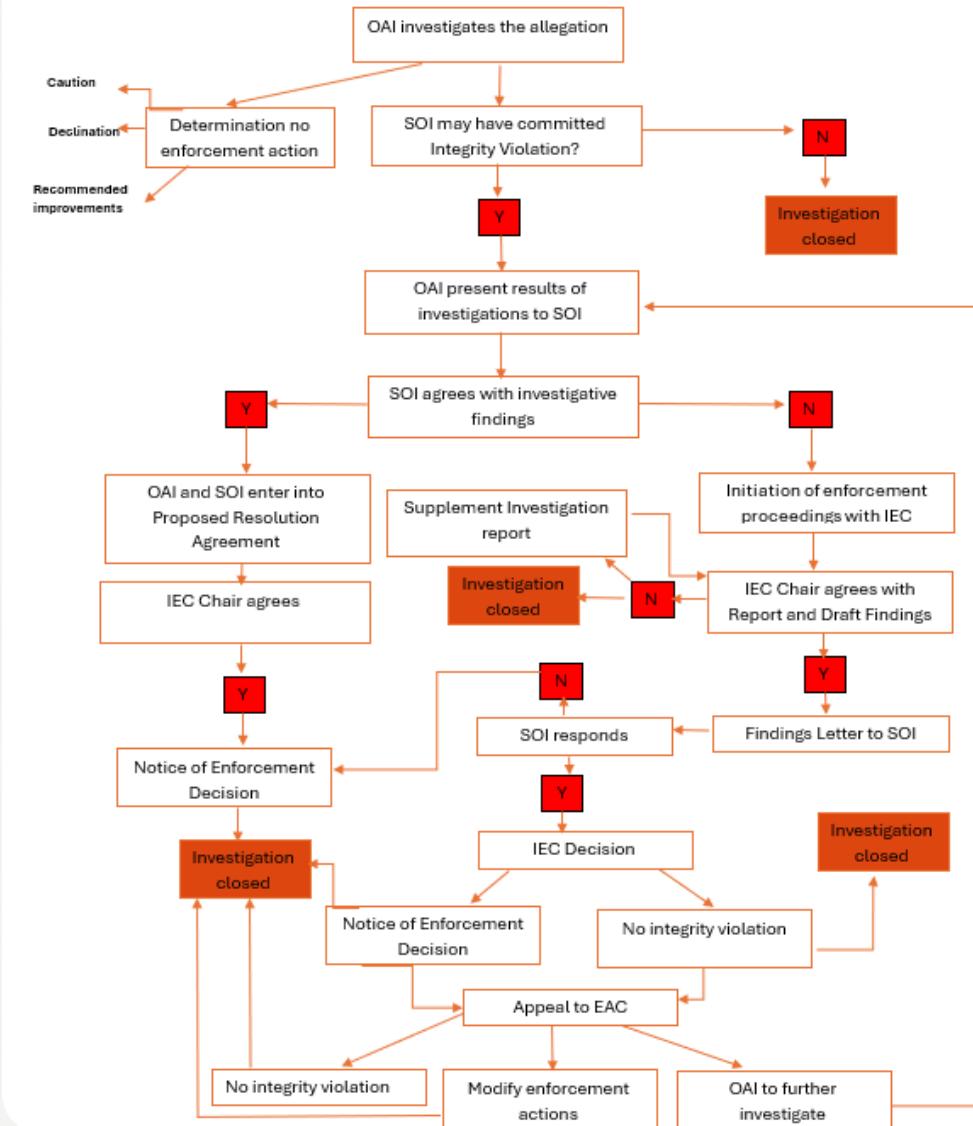
ADB

- 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



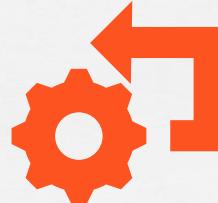
**Suspension** of the loan  
or grant allocations



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



## 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:

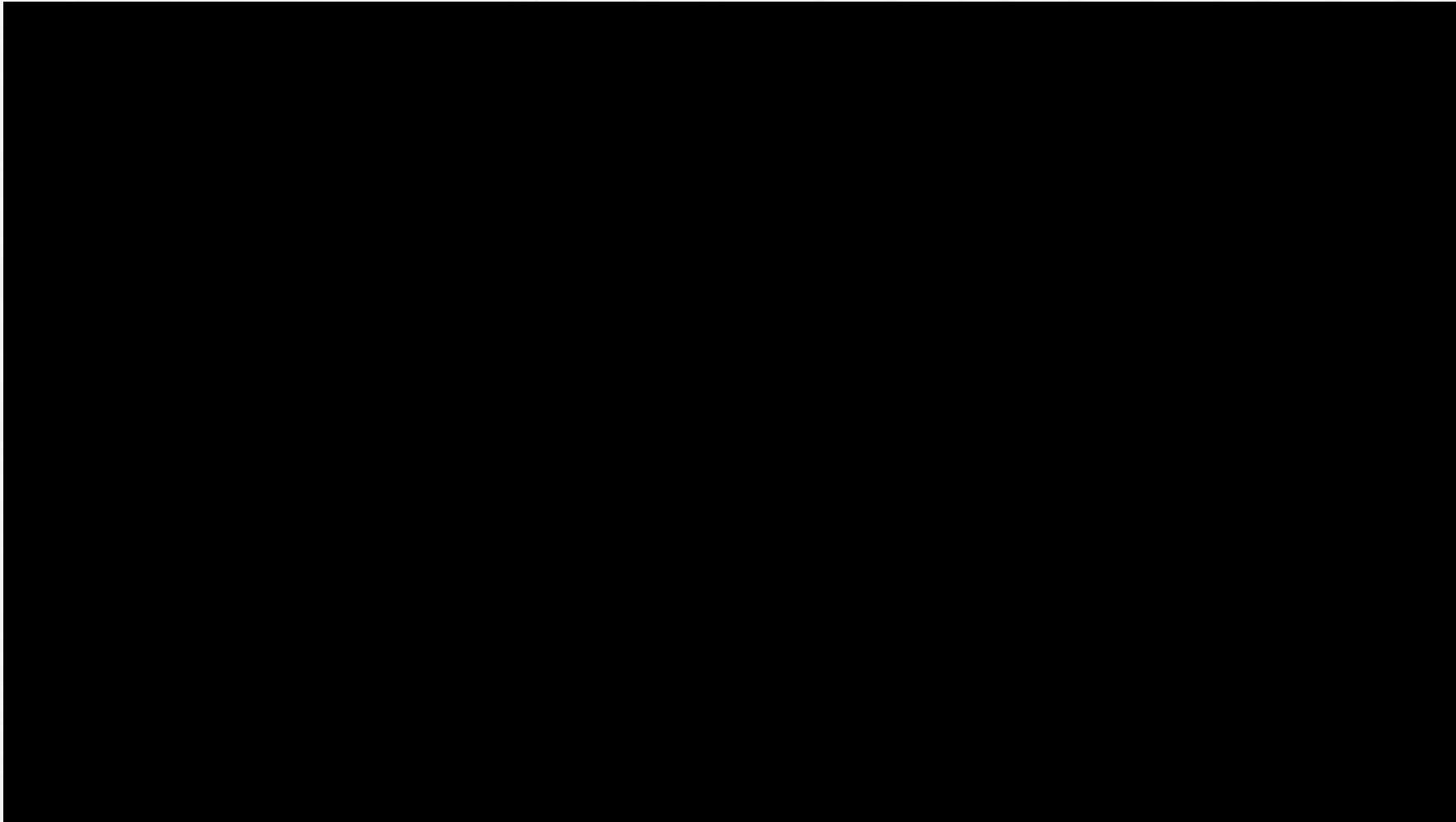
1. Identify areas where improvements can be made to fight corruption.
2. Determine the actions and resources required to improve these areas.
3. Identify opportunities where you and ADB can collaborate in the fight against corruption.



**25 minutes**

# Integrity is Everybody's Business

ADB



# 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

**Frequently Asked Questions on ADB Sanctions**

Scan the QR code to read



What is an ADB 'debarment' and 'ineligibility determination'?  
 1. Debarment is a decision by ADB to prohibit an entity from bidding on ADB-financed projects for a period of time. Debarment is a formalized administrative process, which is distinct from other administrative processes, such as suspension or termination of a contract, or removal of an employee from ADB. Removal is not a debarment, but it can lead to debarment.

Can sanctions be imposed on an individual?  
 Individuals can be debarred individually or collectively.  
 The right to sue the individual's legal entity is not affected by the individual's debarment.

Do sanctions imposed on a firm apply to its employees? What happens to the individual's role in the firm?  
 Employees who have been debarred individually cannot be employed by the firm. However, if the firm has been debarred, but not its employees, ADB deems that the firm's debarment is not the result of the employees' conduct, and the firm's debarment is not a result of the employees' conduct.

When is the 'existing' agency required to check ADB's 'Complete Sanctions List'?  
 Projects or bidding processes including prequalification, bid submission, and negotiations for awarding contracts, best contract, and contract verification, as well as monitoring and reporting, should be checked against the 'existing' agency's list of suspended entities.

How to manage access of existing agencies to ADB's 'Complete Sanctions List'?  
 Existing agencies should:  
 - Designate a appropriate person(s) from the 'existing' agency to respond to requests on the 'existing' agency's behalf.  
 - Make sure to apply for a unique user ID.  
 - Submit a document that identifies information that allow ADB to identify the 'existing' agency to a single point of contact or to the ADB Integrity Unit or the ADB Project Integrity Unit.  
 - If the 'existing' agency does not have a designated user, the user may request for own a longer connection with the ADB.

Office of Anticorruption and Integrity  
 Asian Development Bank (ADB) Headquarter  
 7011 Metro Manila, Philippines  
 Tel: +63 2 520 2344, Fax: +63 2 520 2352  
 Email: [adb.integrity@adb.org](mailto:adb.integrity@adb.org)

**Integrity Risks and Red Flags Series**



Scan the QR code or visit [bit.ly/ADBintegritylessons](http://bit.ly/ADBintegritylessons)

INTEGRITY RISKS AND RED FLAGS IN AGRICULTURE, NATURAL RESOURCES, AND RURAL DEVELOPMENT PROJECTS (JANUARY 2023)

INTEGRITY RISKS AND RED FLAGS IN ENERGY PROJECTS (JANUARY 2023)

INTEGRITY RISKS AND RED FLAGS IN ENERGY PROJECTS (JANUARY 2023)

INTEGRITY RISKS AND RED FLAGS IN WATER PROJECTS (JANUARY 2023)

INTEGRITY RISKS AND RED FLAGS IN TRANSPORT PROJECTS (JANUARY 2023)

**ADB eLEARN**

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

Take the course now!

Scan the QR code or visit: [bit.ly/ADB-DPIV](http://bit.ly/ADB-DPIV)



QR code: 

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](http://www.adb.org/integrity)



@anticorruptionandintegrity



[anticorruption@adb.org](mailto:anticorruption@adb.org)  
[integrity@adb.org](mailto:integrity@adb.org)



@adb\_oai



+63-2-8632 5004



ADB Anticorruption and Integrity



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



# Thank you!



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