



Office of Anticorruption and Integrity



The Integrity Learning Series

Anticorruption and Integrity Training

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Principal Integrity Specialist

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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

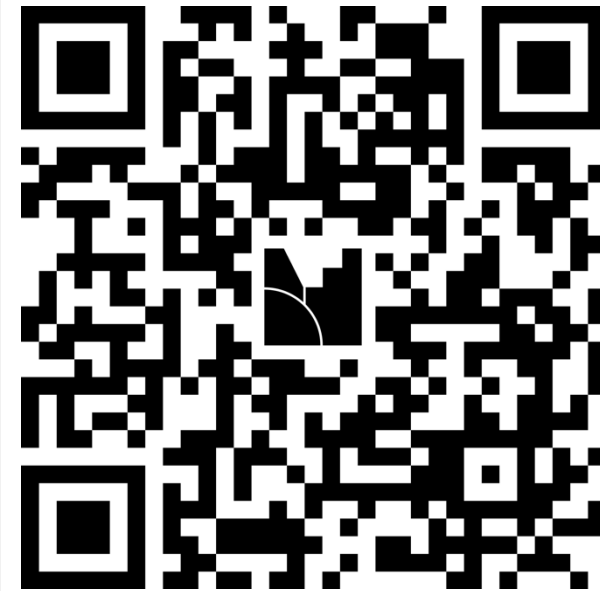
**3:45 PM to
4:45 PM**

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?



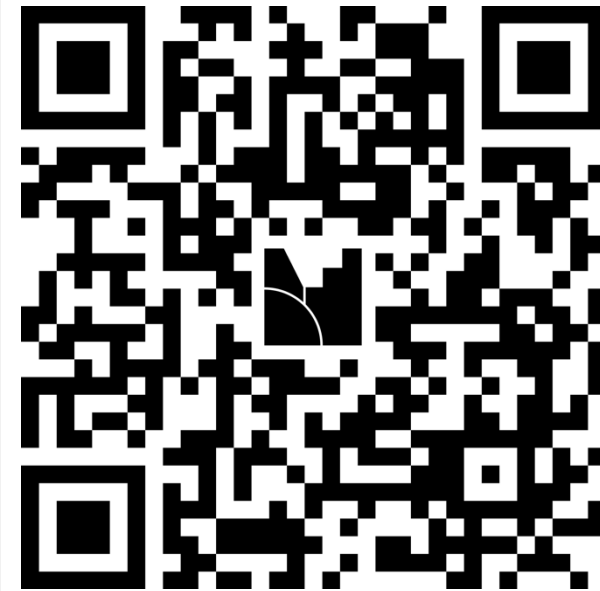
Scan the QR Code or go to menti.com
and enter code **6580 2480**

Mentimeter Scenario 1: RESULTS

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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

KYRGYZSTAN

Score

25/100

Rank

146/180

Score change



-1 since 2023

Roles and Responsibilities of different stakeholders

Government

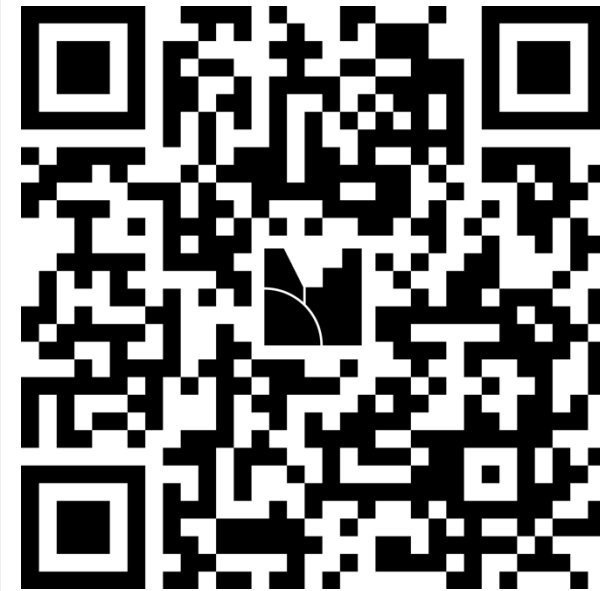


Enacting **laws**, fostering **transparency**,
enforcing **regulations**

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.

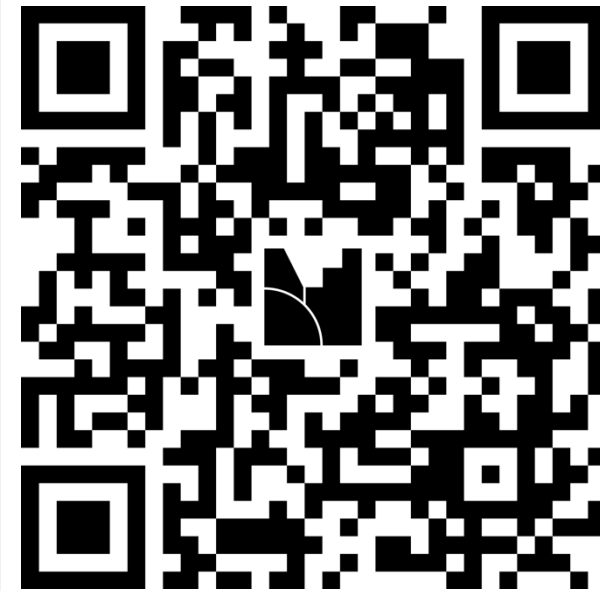


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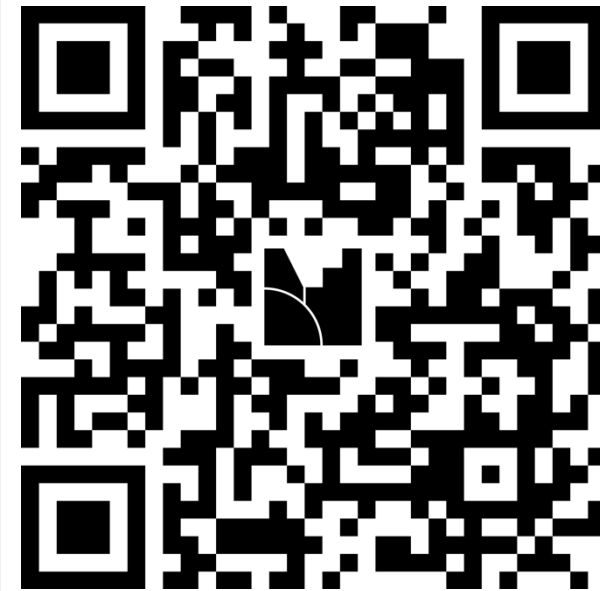


Raising **awareness**, **monitoring**,
advocating for reform

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.

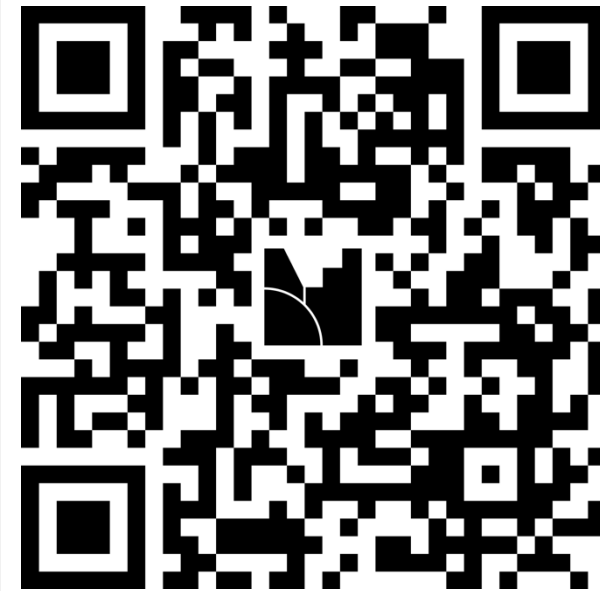


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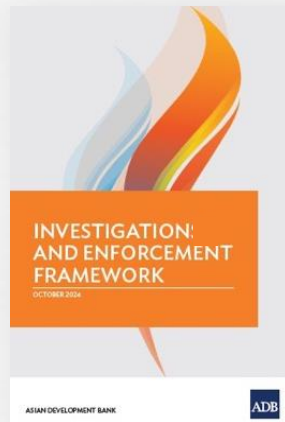
Reporting corruption



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

Bidding Announcement

We hope you all had a nice holiday season and a big congrats to all of our single life! However, some of you have a question for making it such a successful season and a lot of fun to be a part of the staff. We need the your own chance to win big with some exciting good stuff!

New Download Feature
We have some exciting updates that we wanted to make sure that you guys knew about. The first one I'll go over is the new and highly anticipated download button. Yep, now you can easily download your creations and upload them

[illegible]

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

We hope you all had a nice holiday season and a big congrats to all of our Chicago folk. Please contact us at a Thank you all once again for making it such a wonderful season and a lot of fun to be a part of for all the staff! Stay tuned for your next chance to win big with some exciting special prizes!

New Download Feature
We have some exciting updates that we wanted to make sure that you guys knew about. The first one I will go over is the new and highly anticipated download button. Yes, now you can easily download your creations and upload them to your site, save time on

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". Click on the button you will be to a skill. There is a fee for this feature and it does depend on the length of the video. However, the first download is automatically 70% off and subsequent downloads are only 50% off the second price! Let us illustrate this to all you that the first to call at 800-939-6262. The video is saved as mp4 #0064, 0306128, 6, 600 kbps, 20 frames per sec. the media on DVD, (34100Kb, 1280x800, stereo), in other words...it's very



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

Letter of Bid

NOTE

The bidder must

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 contractor'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]

We, the undersigned,

(a) We have

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 the services rendered for the last three years of exchange at the end of the year.

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

Form FIN – 1: Historical Financial Performance

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 the entire lot 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 or omission herein may lead to my disqualification or dismissal, if engaged.

2. _____ Date: _____
_____ or expert or authorized representative of the firm]⁹ Day/Month/Year

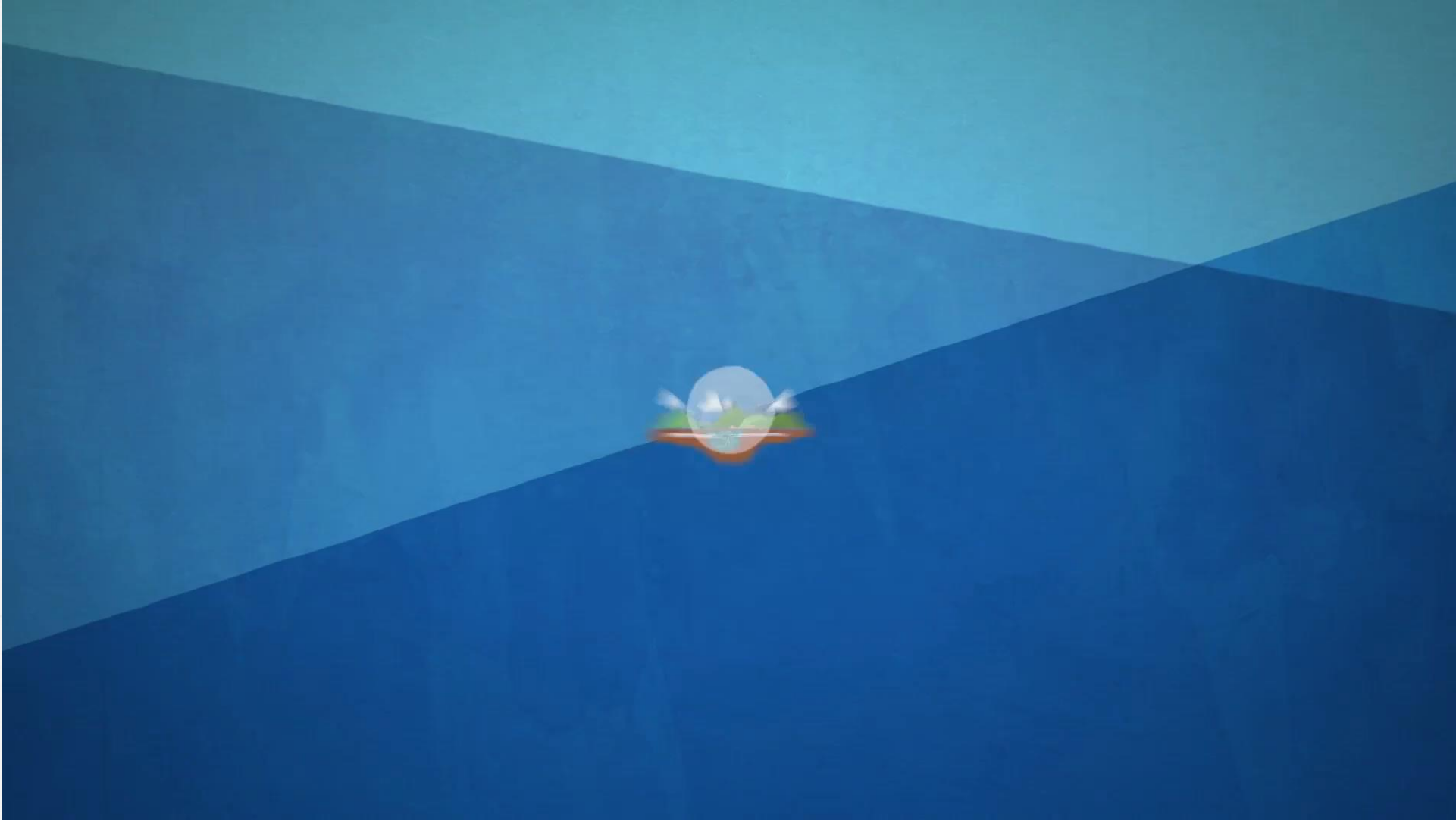
Full name of authorized representative

Proposed personnel/experts should be aware and available

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?

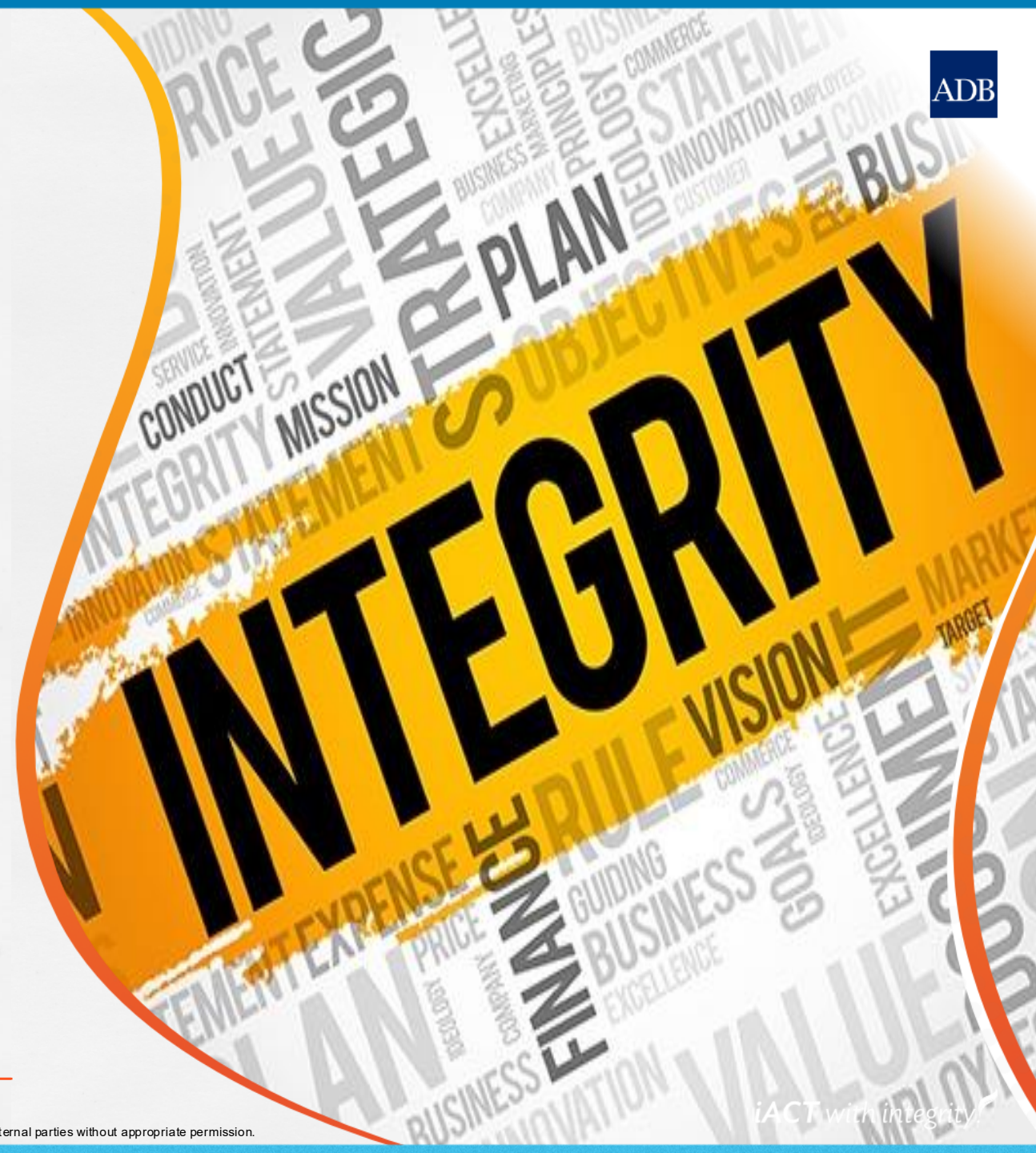
I. Recognizing and Reducing Risk

- Red Flags

- **Due Diligence**

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

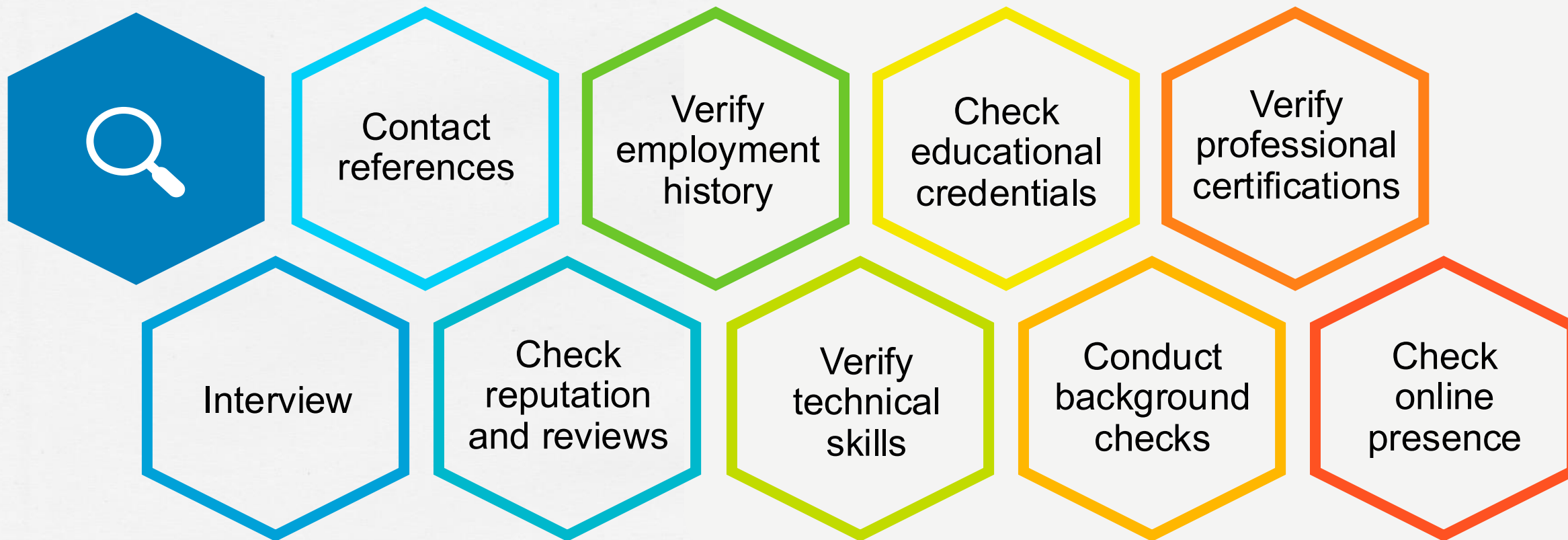


Approach to ethics
and compliance

Conduct Due Diligence



Conduct Due Diligence



Conduct Due Diligence: Searching Techniques

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

Others:



Asterisk (*)
as a wildcard



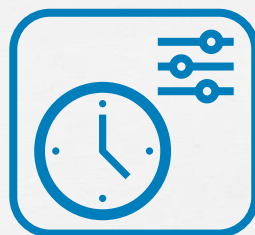
Site-specific
searches



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

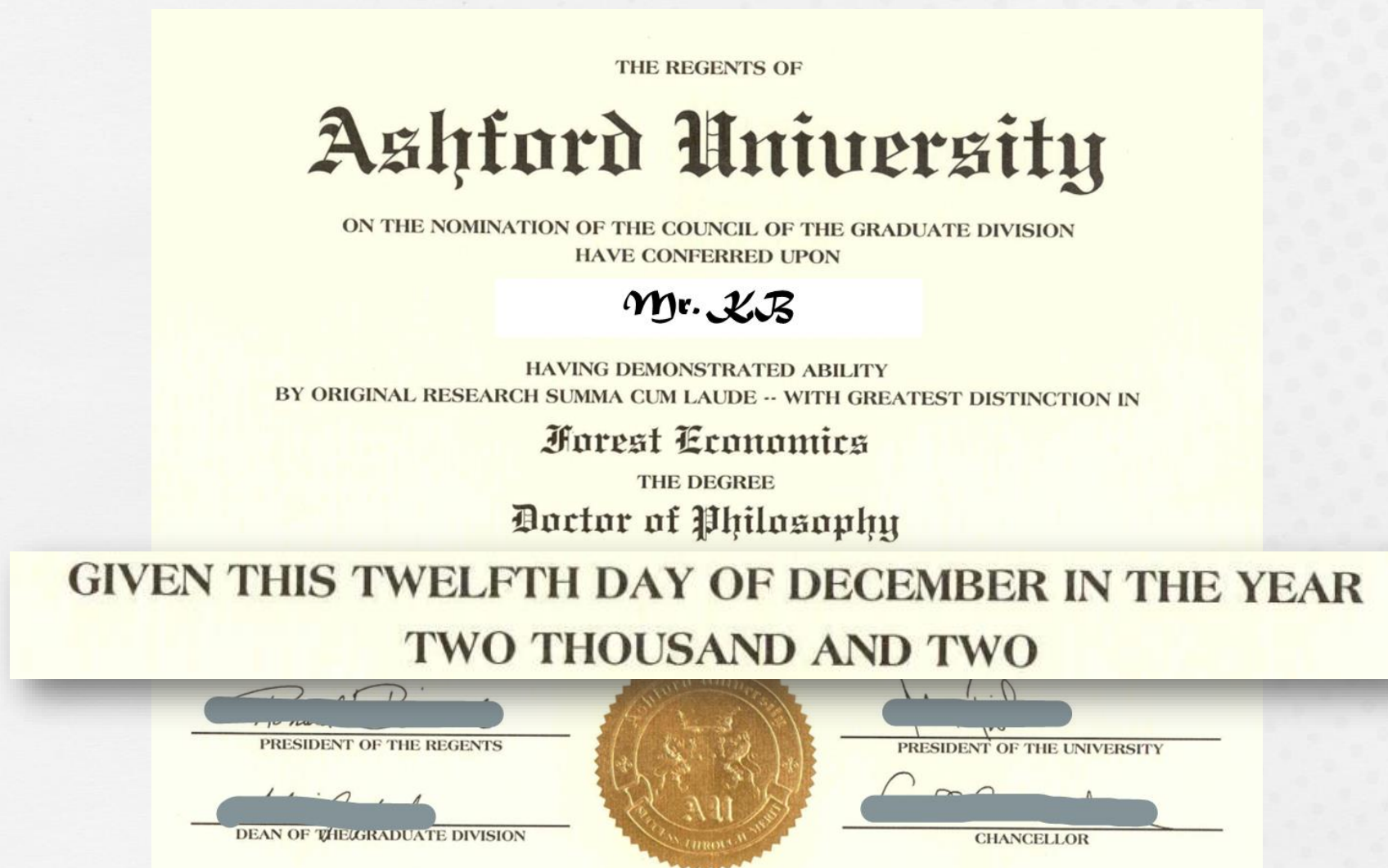


Illegal or disreputable activities

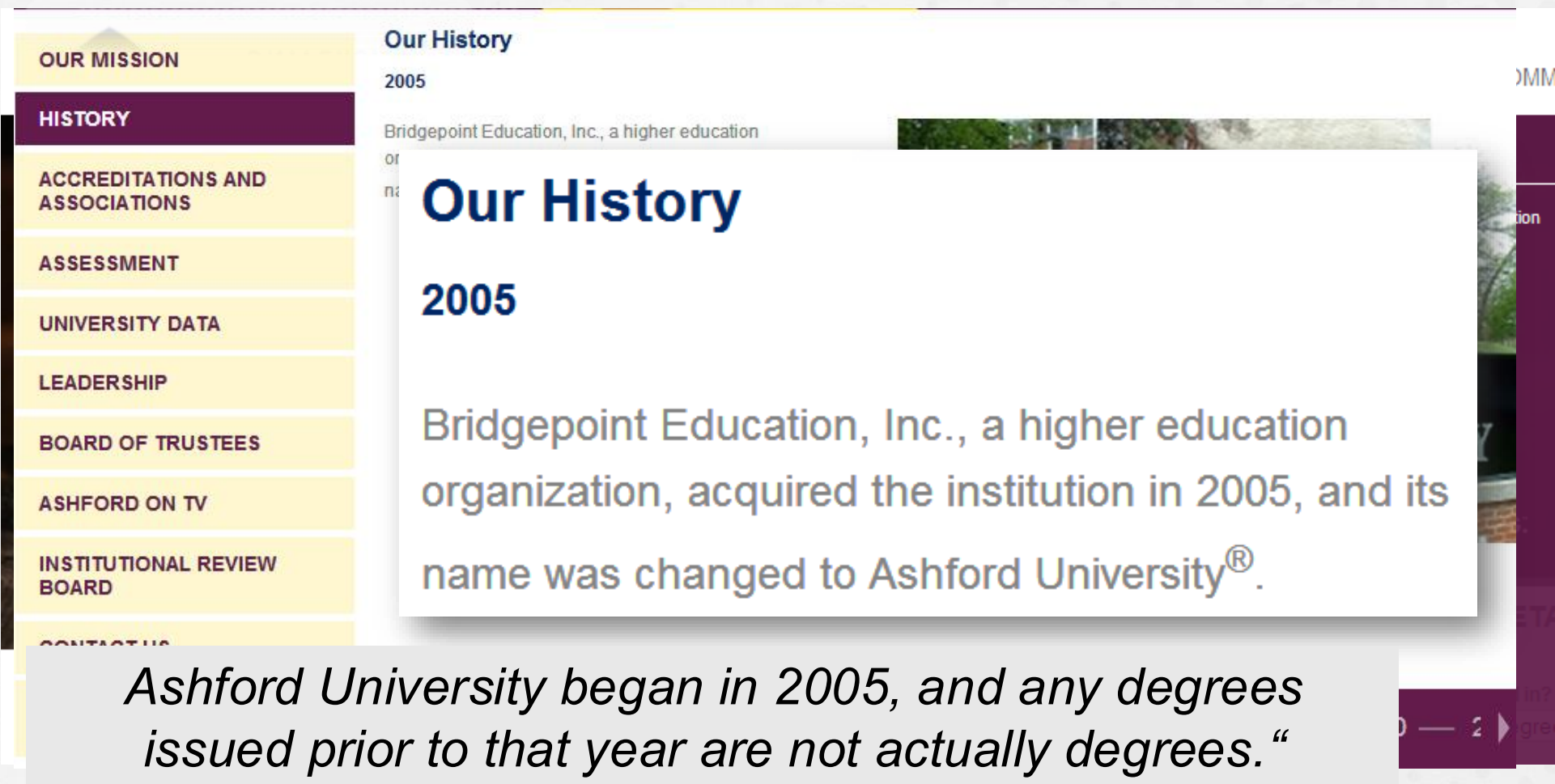


Break Time

(1 hour and 15 mins)



NO PhD programmes



The screenshot shows the Ashford University website. On the left is a navigation menu with links: OUR MISSION, HISTORY, ACCREDITATIONS AND ASSOCIATIONS, ASSESSMENT, UNIVERSITY DATA, LEADERSHIP, BOARD OF TRUSTEES, ASHFORD ON TV, INSTITUTIONAL REVIEW BOARD, and CONTACT US. The 'HISTORY' link is highlighted. The main content area is titled 'Our History' and features a section for the year '2005'. The text in this section reads: 'Bridgepoint Education, Inc., a higher education organization, acquired the institution in 2005, and its name was changed to Ashford University®.' There is a small image of a building to the right of the text.

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>

 **ASIAN DEVELOPMENT BANK**

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

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](#)

Other Information
[Application](#)
[Temporary Suspension](#)
[Debarment](#)
[Contract](#)

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.

PUBLISHED LIST


Accessible to the public

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

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Other Information

- [Application](#)
- [Temporary Suspension](#)
- [Debarment Period](#)
- [Contract Variations](#)

<http://sanctions.adb.org>

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

Search Functionality

ADB ASIAN DEVELOPMENT BANK

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

Complete ADB Debarment and Suspension Register

Entity Type	Name	Address	Sanction Type	Other Name / Logo	Nationality	Effect Date / Lapse Date	Grounds	Changes Made on
<div><div></div><div>Search names using the search bar</div></div> <div><div></div><div>Avoid including common terms when searching "Ltd", "Company", "LLC" Example: Use "A2Z" when searching for A2Z Waste Management</div></div> <div><div></div><div>Remove leading terms such as "M/S, or M/S." from company names</div></div>								

Page 1 of 1

United Nations Security Council Sanctions: Obligations





- ## 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.



[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

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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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

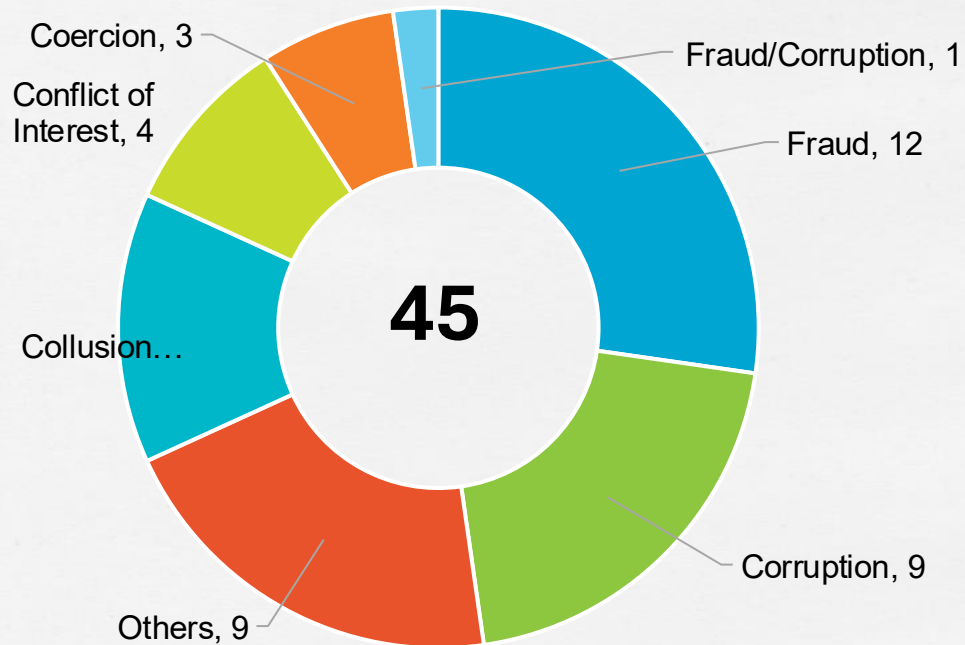
Break Time

(15 mins)

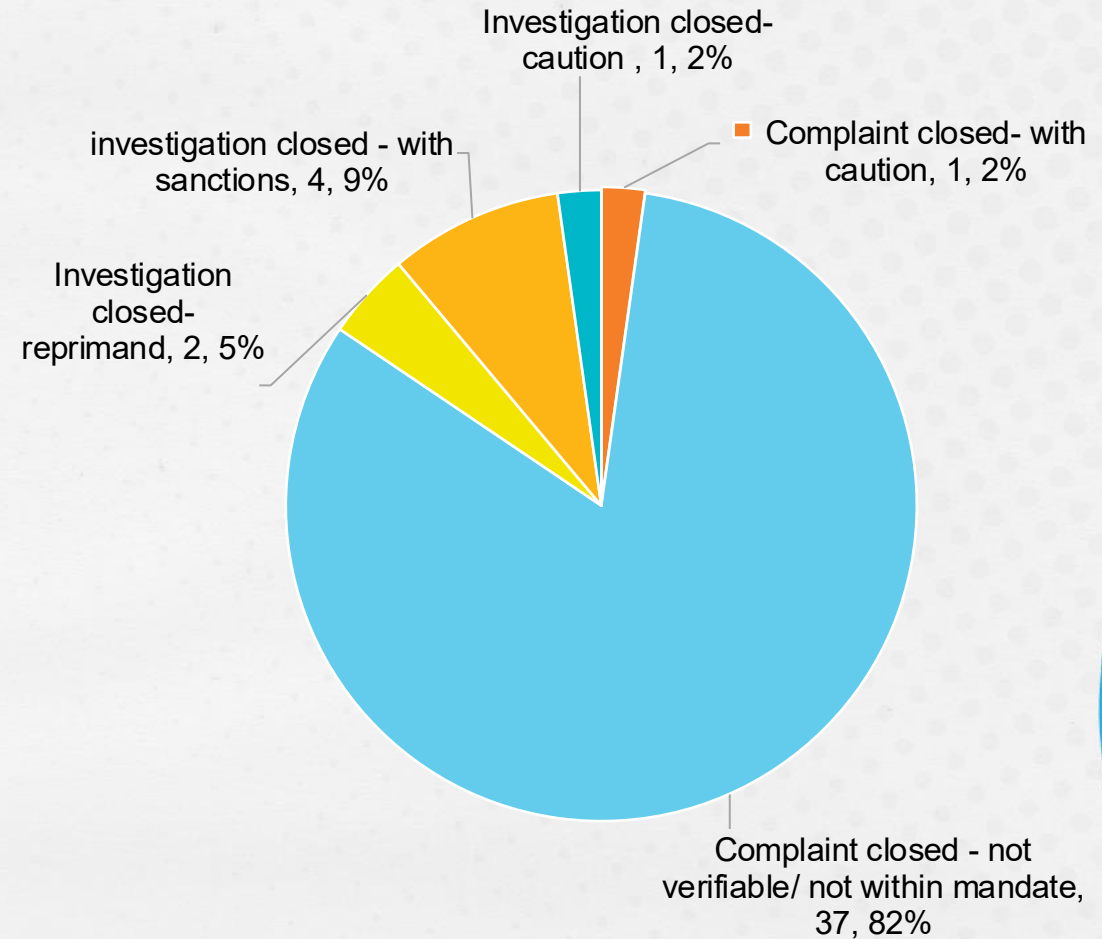
II. ADB Debarments and Suspensions

Completed OAI cases in Kyrgyz Republic 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

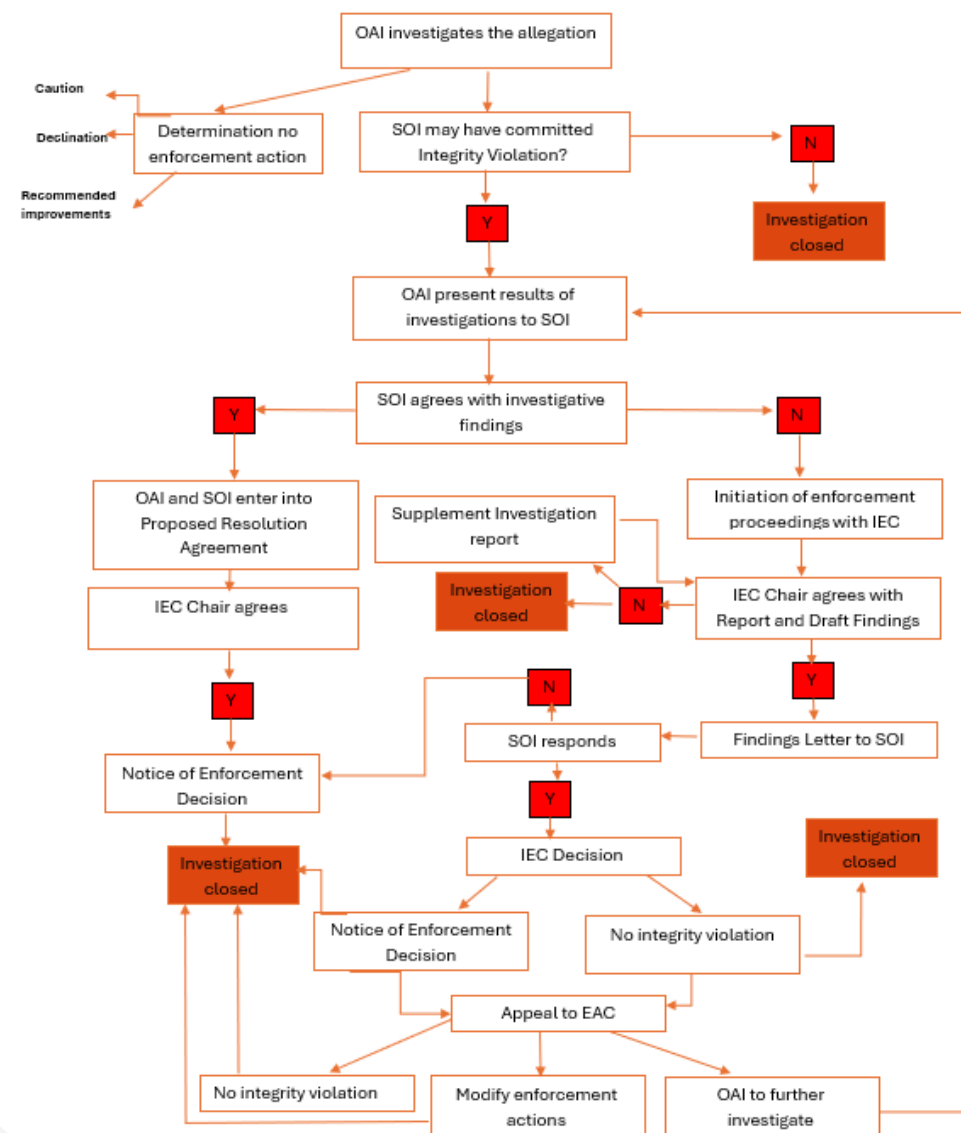
External Investigations Team (EIT)

- 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



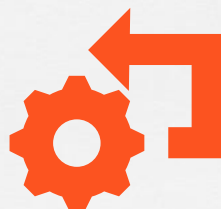
Suspension of the loan or grant allocations



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

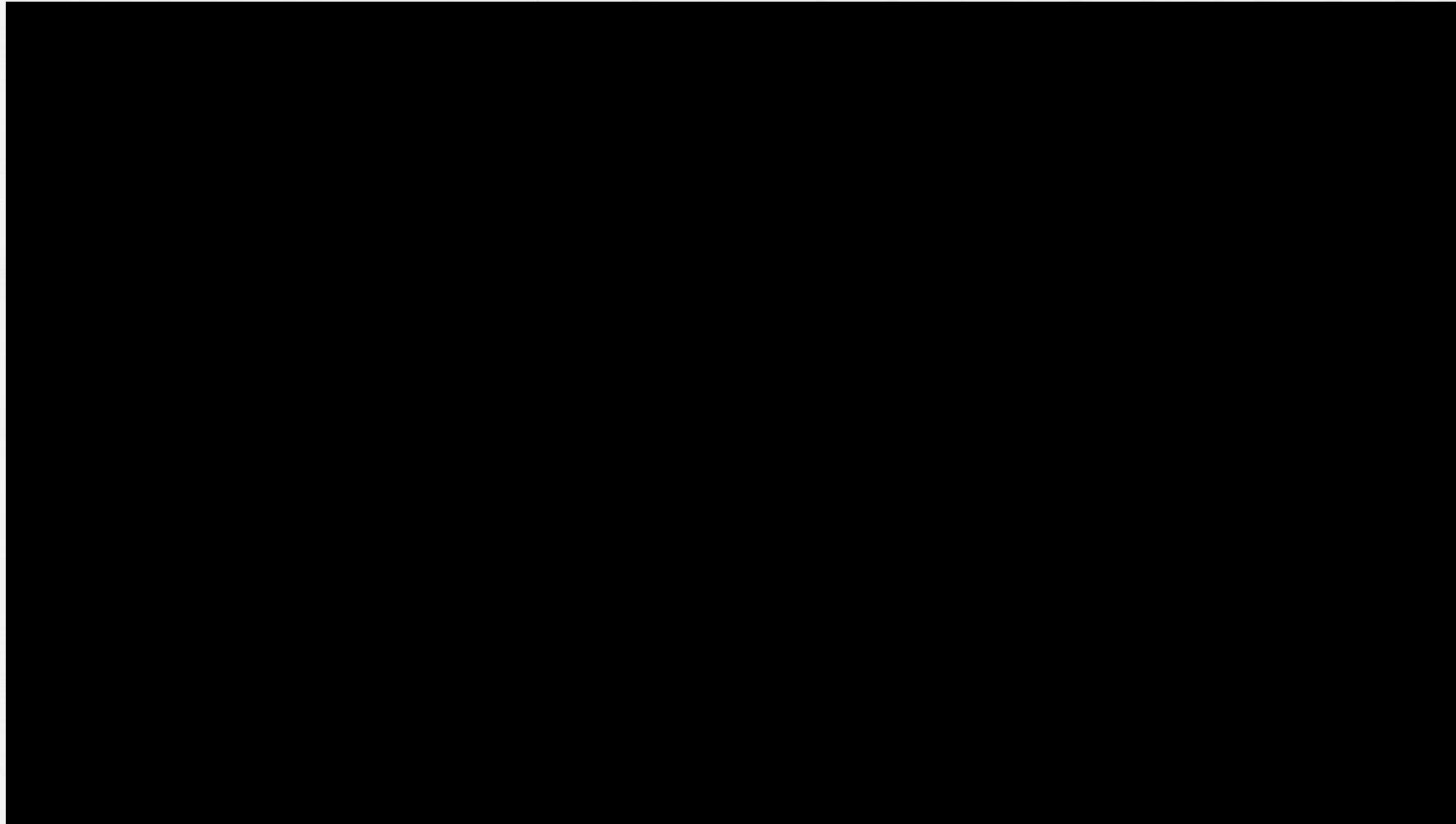
Each team will be provided time to:

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



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



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



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ADB Anticorruption and Integrity



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

Thank you!



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