



Integrity in ADB Projects

Business Opportunities Seminar 2024

Jonathan Helliwell
Senior Integrity Specialist

Kathmandu, Nepal
24 September 2024

iACT with integrity.



Introduction

1. What do we do?

- Mitigate integrity risks (advice, training, reviews)
- Investigate integrity violations (zero tolerance)

2. Why are we here?

- Promote integrity & strengthen governance
- Increase awareness and built capacity

3. What can you do?

- Learn about ADB's Anticorruption Framework
- Perform Due Diligence & champion integrity



Project Success

ADB



Governments

**Contractors, consultants,
and suppliers**

Integrity Policy Framework



OAI's Toolkit

Raising awareness

Integrity Due Diligence

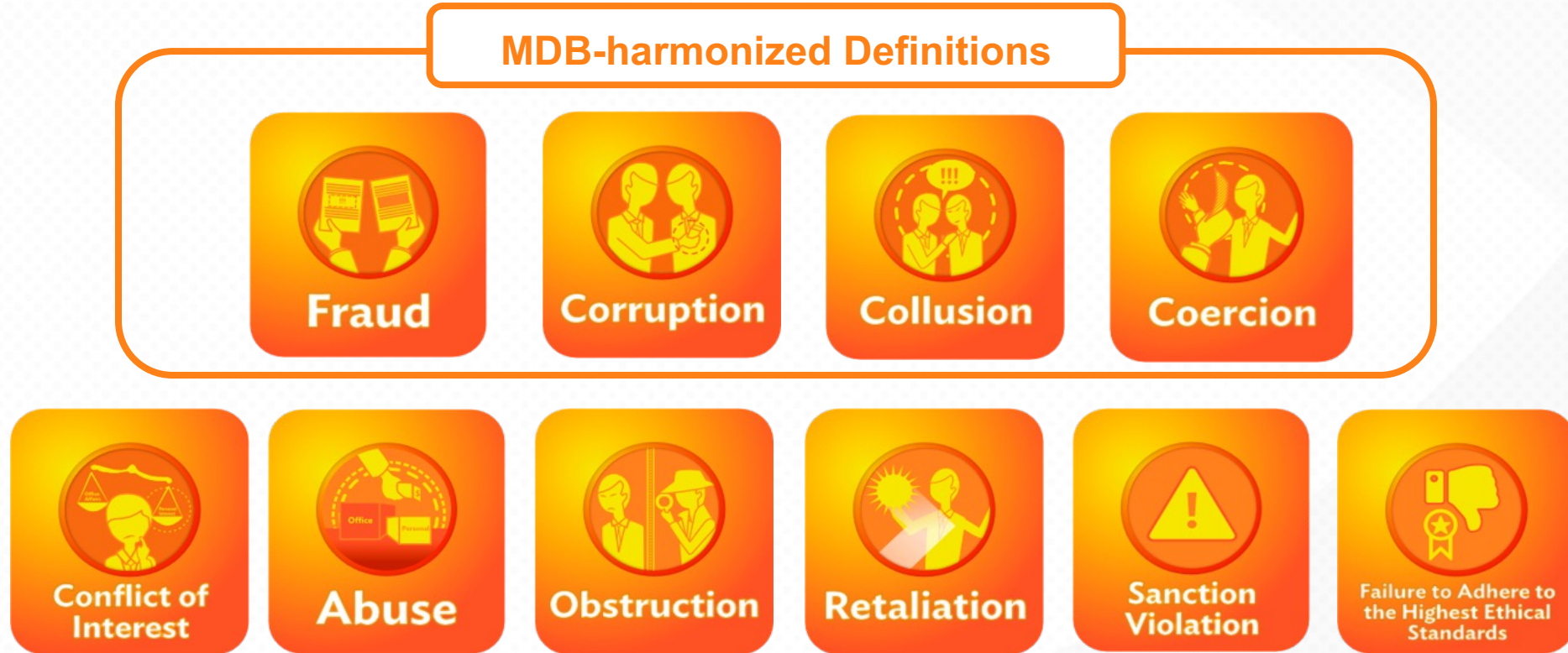
Proactive Integrity Reviews

Investigations

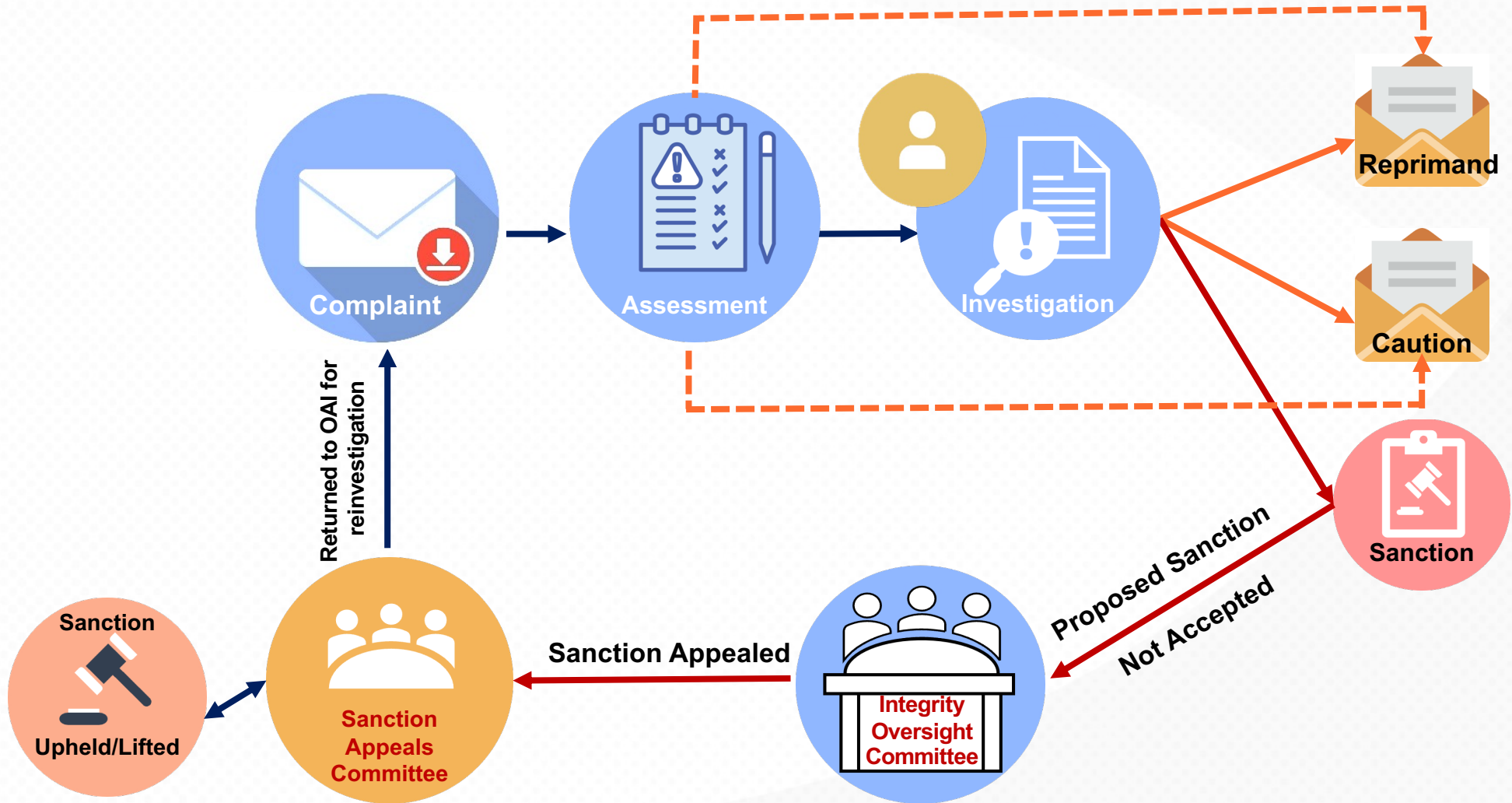
Zero Tolerance



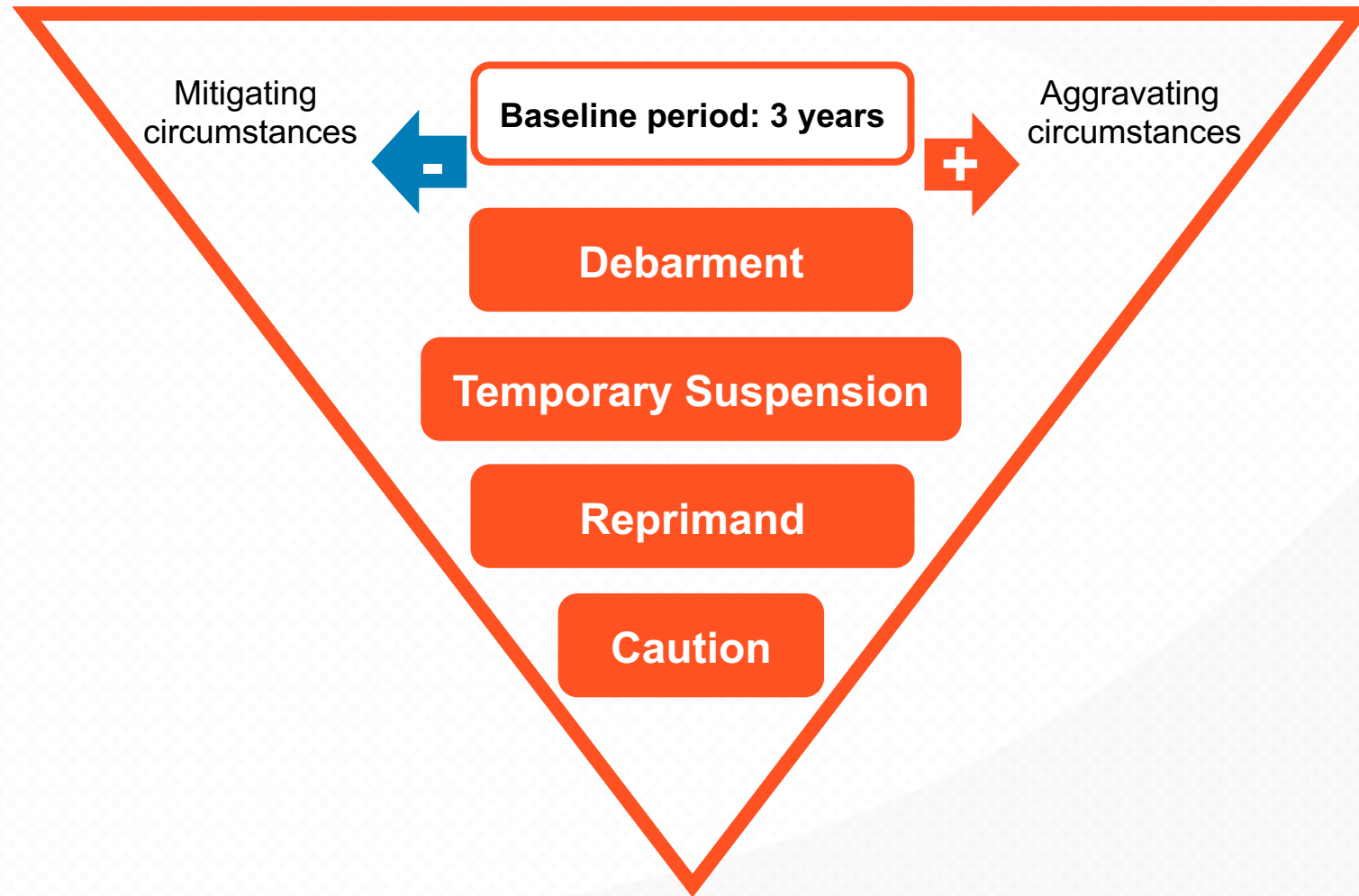
Integrity Violations



Investigation Process



Remedial Actions



Sanctioned Entities

(21 Sept. 2024)



Current Sanctions

2,263

852

Total Sanctions

4,026

1,205

Impact while under sanction



Cross Debarment

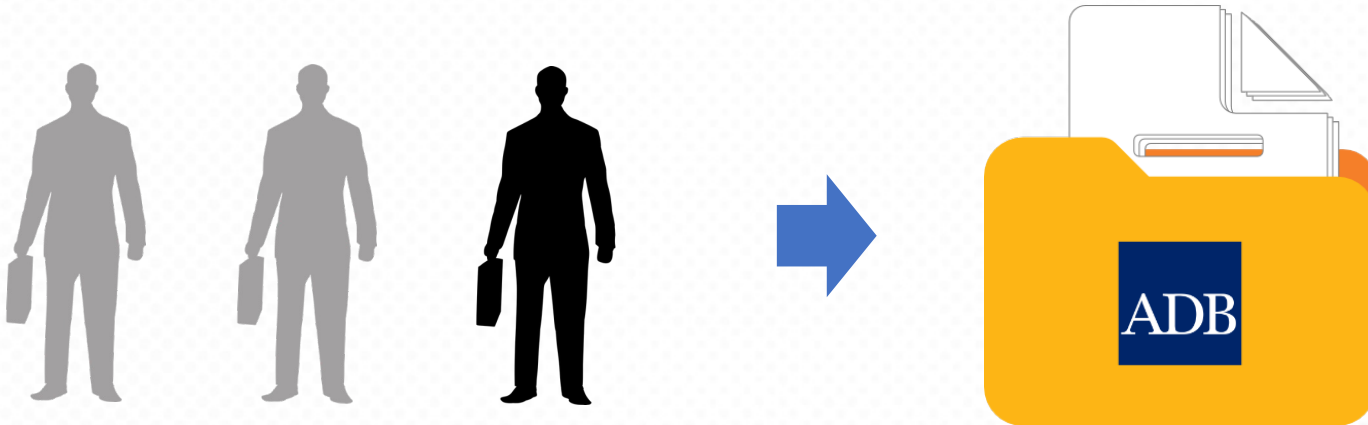


A party to the Uniform Framework (2006); not a party to the Cross Debarment Agreement.



Integrity Violations – Example 1

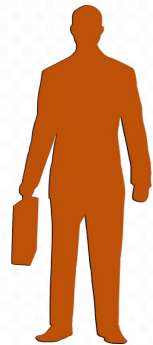
- Lead firm in Joint Venture misrepresented partner's engagement



Fraud & Obstruction

Integrity Violations – Example 1

- Lead firm in Joint Venture misrepresented partner's engagement
- Lead firm made false statements



Fraud & Obstruction

Integrity Violations – Example 1

- Lead firm in Joint Venture misrepresented partner's engagement
- Lead firm made false statements
- Lead firm failed to respond to OAI's findings



OAI



Fraud & Obstruction

Integrity Violations – Example 1

- Lead firm in Joint Venture misrepresented partner's engagement
- Lead firm made false statements
- Lead firm failed to respond to OAI's findings
- **Result** – 6-year sanction for lead firm and its director



Fraud & Obstruction

Integrity Violations – Example 2

- Firm and authorized representatives submitted bids for two ADB contracts while under Sanction for fraudulent practice
- **Result** – 3 additional years published sanction for firm and representatives



Violation of sanctions

Integrity Violations – Example 3

- Winning firm owned by Implementing Agency Officer



**Conflict of Interest &
Collusion**

Integrity Violations – Example 3

- Winning firm owned by Implementing Agency Officer
- Competing firms colluded to defraud ADB with false bids



**Conflict of Interest &
Collusion**

Integrity Violations – Example 3

- Winning firm owned by Implementing Agency Officer
- Competing firms colluded to defraud ADB with false bids
- **Result** – 7-year sanction for 2 firms and 3 individuals



Conflict of Interest &
Collusion

Conduct Due Diligence



It is your responsibility

Conduct Due Diligence



Partner Integrity



Accuracy

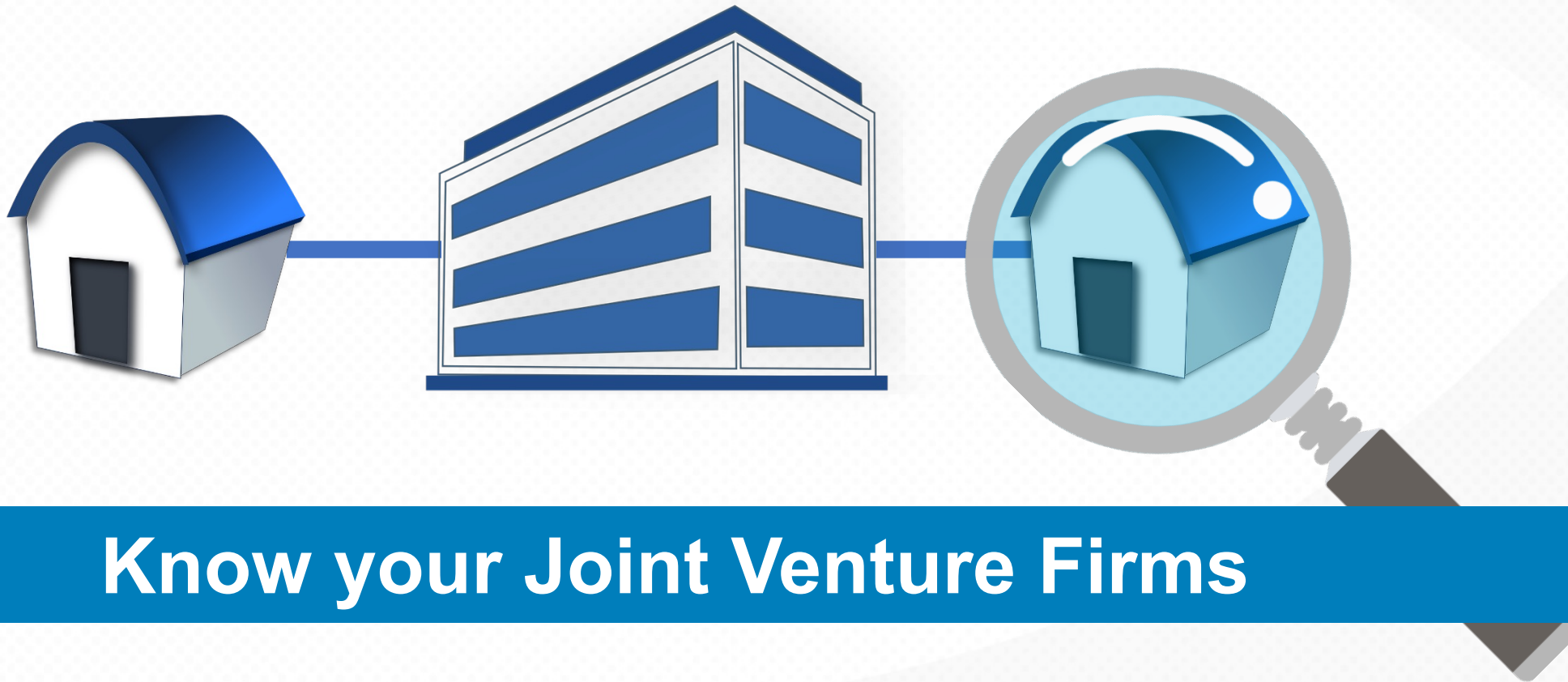


**Own
Reputation**



**Successful
Projects**

Conduct Due Diligence



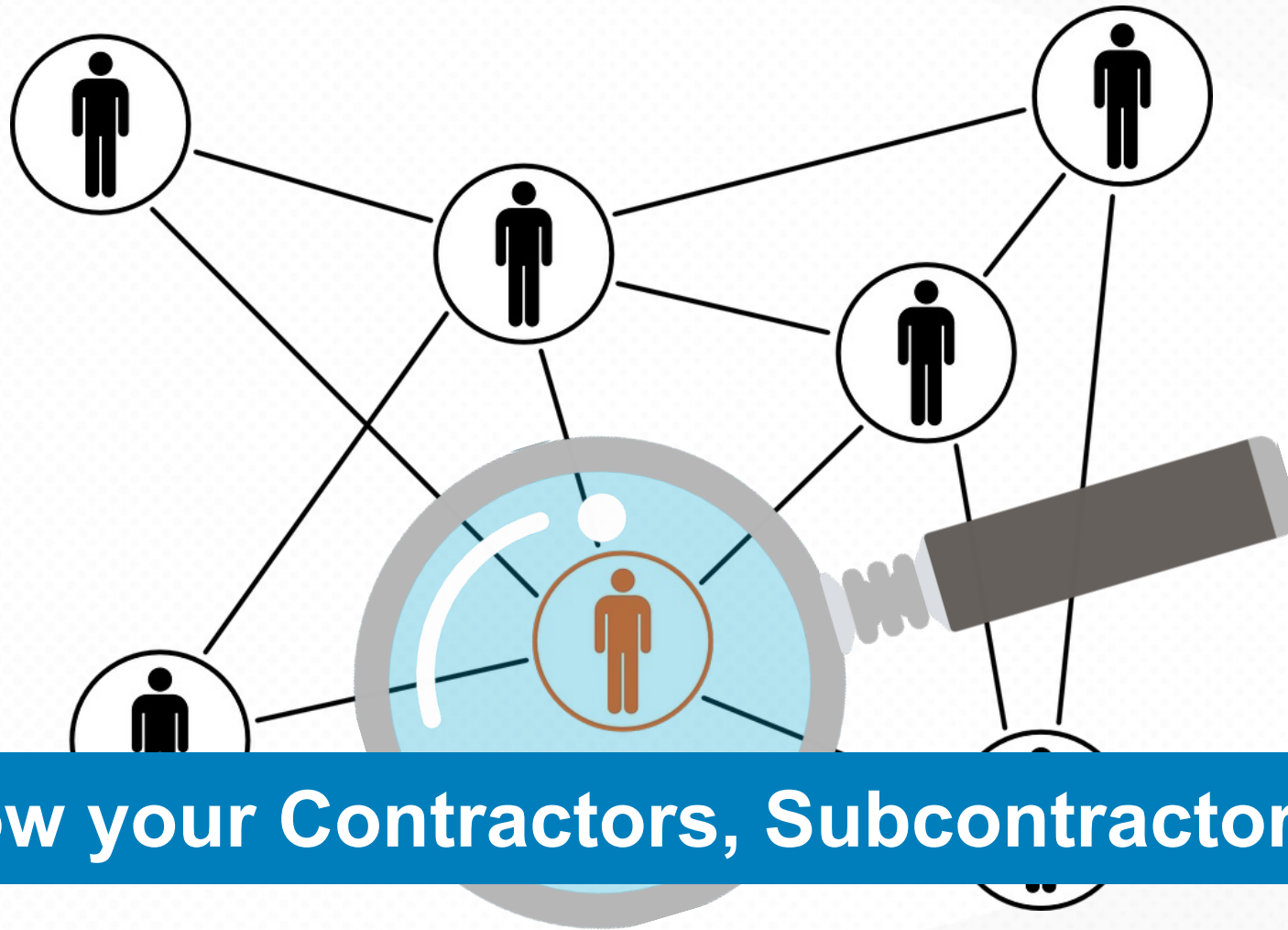
Know your Joint Venture Firms

Conduct Due Diligence



Know your Partners

Conduct Due Diligence



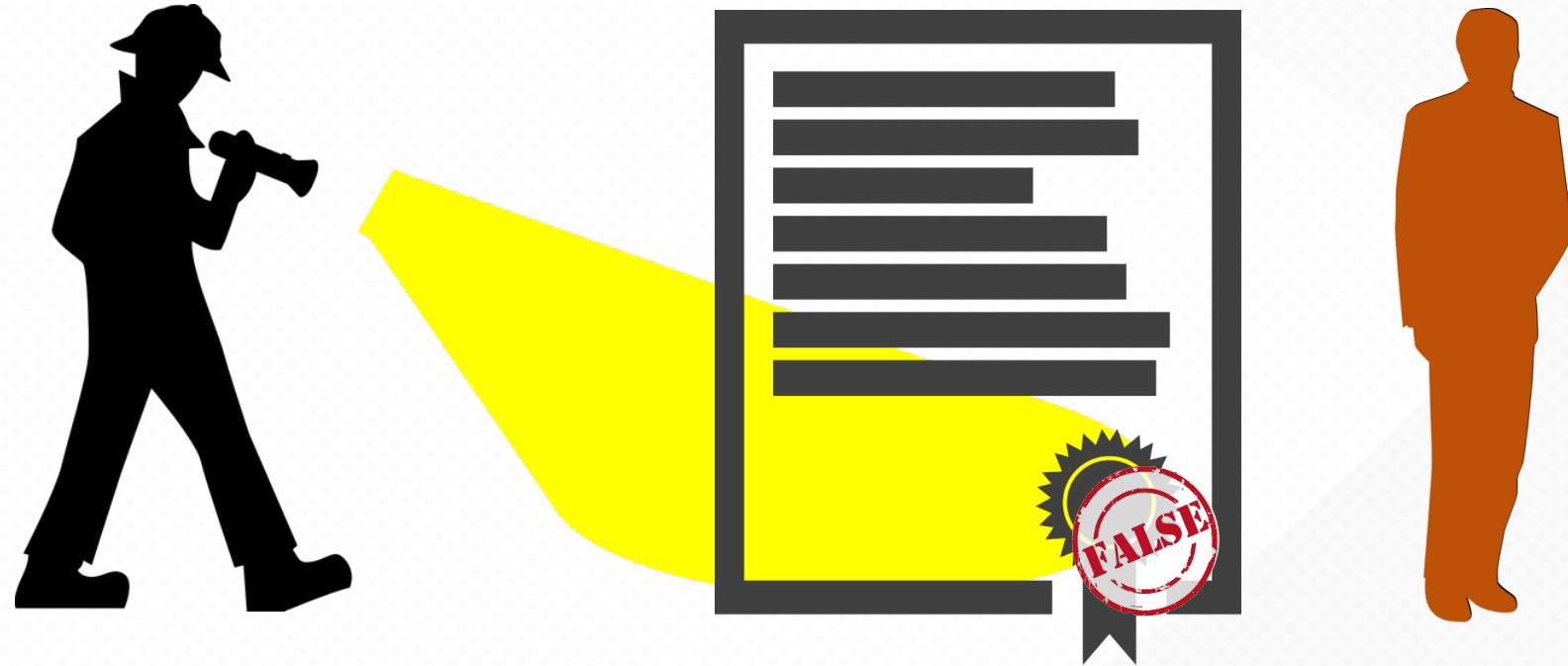
Know your Contractors, Subcontractors, Agents

Conduct Due Diligence



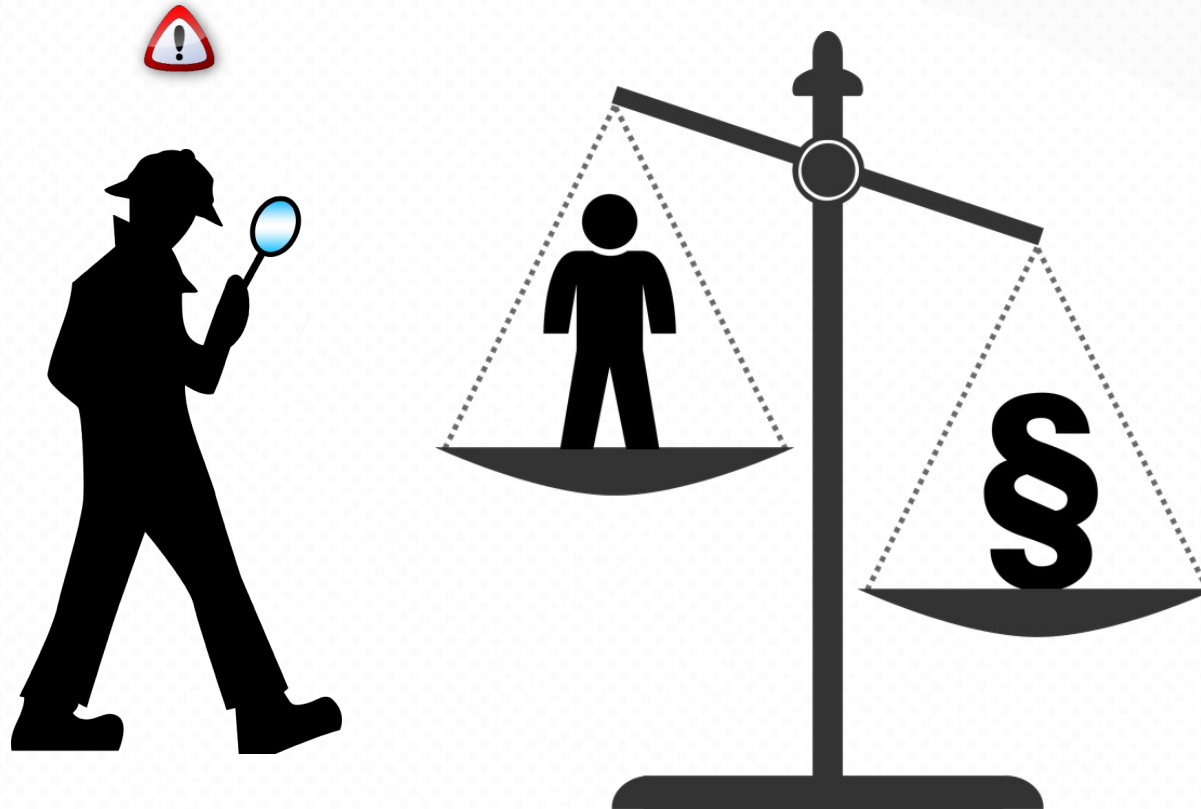
Know your Suppliers

Conduct Due Diligence



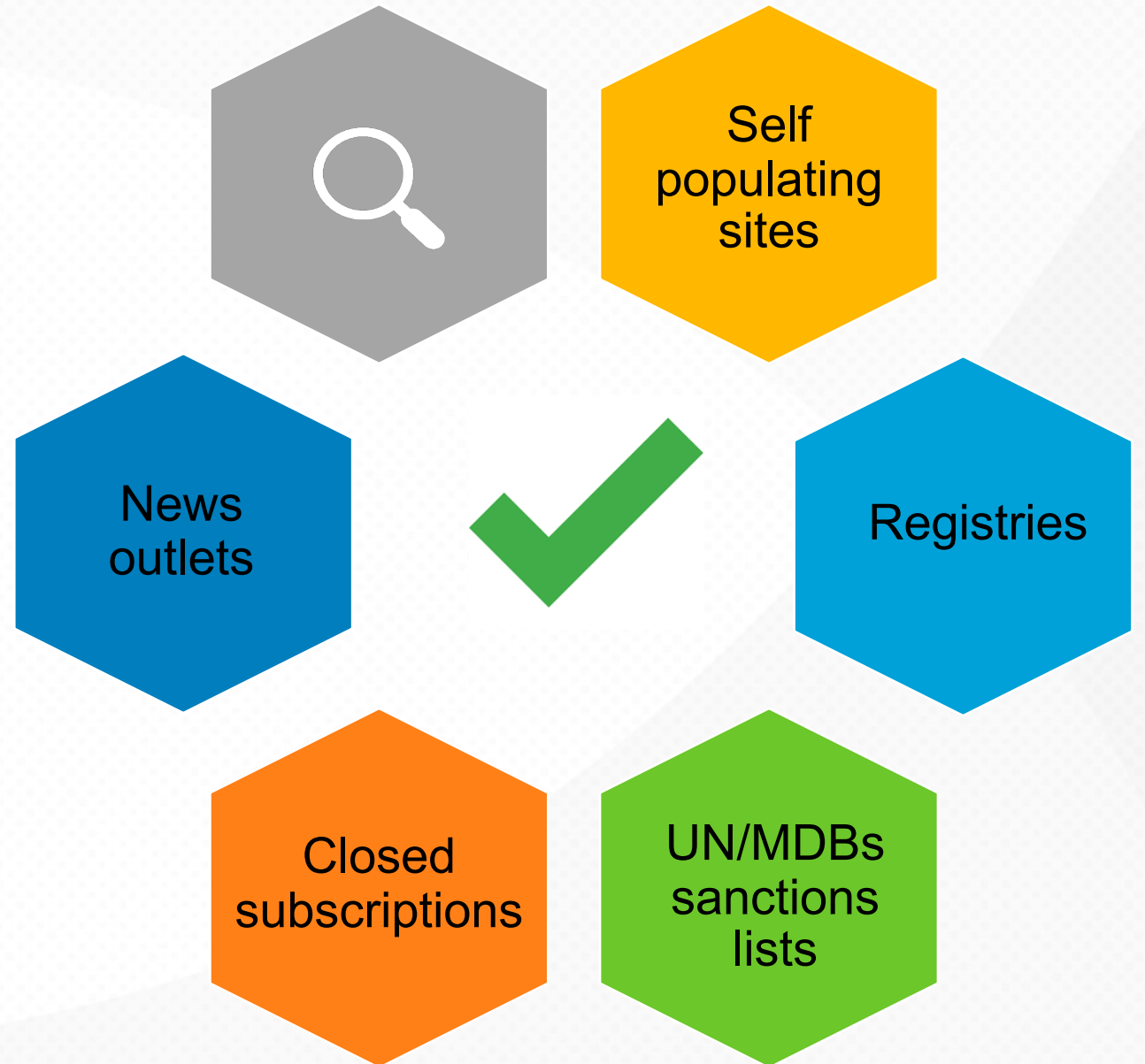
Check whether the firm has the right policies & procedures in place

Conduct Due Diligence



Check whether the firm has the right policies & procedures in place

Conduct Due Diligence



What you should be doing

- 1. Conduct due diligence on your partners



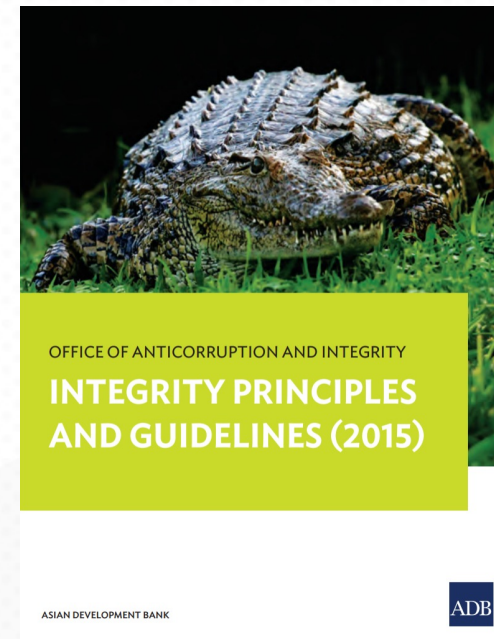
What you should be doing

- 2. Implement robust policies & procedures



What you should be doing

3. Train your staff on ADB's Integrity Principles & Guidelines



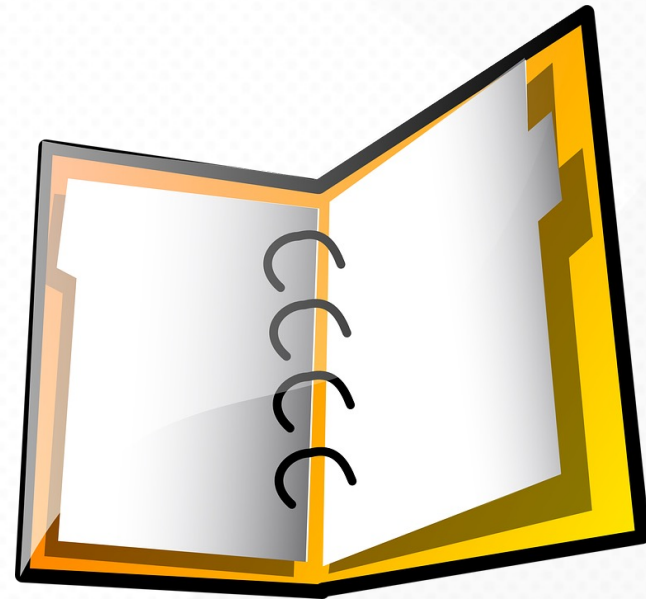
What you should be doing

4. Submit accurate bid documents



What you should be doing

- 5. Disclose requested information



What you should be doing

6. Report any integrity violation or concern

News and Events ADB Institute Contact English

ADB ASIAN DEVELOPMENT BANK

WHO WE ARE WHAT WE DO WHERE WE WORK WORK WITH US Search

Anticorruption and Integrity

Underpinned by ADB's zero tolerance for corruption, the Office of Anticorruption and Integrity aligns with ADB's commitment to strengthen governance across Asia and the Pacific as it mitigates integrity risks, investigates integrity violations, and promotes integrity among ADB's stakeholders.

Home Report Integrity Violations Our Work Advisories and Sanctions Activities

Who We Are > Anticorruption and Integrity > Anticorruption and Integrity: Report Inte...

Report Integrity Violations

Submit an Online Complaint

- What can I report to OAI? >
- What concerns are outside OAI's mandate? >
- How do I report a complaint? >
- What are my rights and responsibilities as a complainant? >
- What happens to my complaint? >
- Whistleblower and Witness Protection >
- Code of Conduct >

Related

- Anticorruption Policy
- Integrity Principles and Guidelines (2015)
- Anticorruption Policy: Enhancing the Role of the Asian Development Bank in Relation to Tax Integrity (Policy Paper)
- Online Course: Anticorruption and Integrity at ADB
- ADB-OECD Anti-corruption Initiative for Asia Pacific
- Frequently Asked Questions on Anticorruption and Integrity: A Guide for ADB Staff

Warning
Beware of scams using ADB's name

ADB Sanctions List
Accessible to authorized users only.

Cross debarred entities
Accessible to authorized users only.

What you should be doing

7. Be transparent with unethical behavior




Integrity is Everyone's Responsibility.



Do not assume that someone else is doing it.

Other Resources



Frequently Asked Questions on ADB Sanctions

Frequently Asked Questions on ADB Sanctions

Scan the QR code to read

Office of Anticorruption and Integrity
 100 Massachusetts Avenue, 5th Floor, Boston, MA 02115
 Tel: +1 617 352 1400 | Fax: +1 617 352 1401
 Email: iaact@adb.org | www.adb.org/iaact



Integrity Risks and Red Flags Series

Scan the QR code or visit bit.ly/ADBintegritylessons

Integrity Risks and Red Flags in Education Projects (January 2022)
 Integrity Risks and Red Flags in Energy Projects (February 2022)
 Integrity Risks and Red Flags in Health Projects (February 2022)
 Integrity Risks and Red Flags in Water Projects (March 2022)
 Integrity Risks and Red Flags in Transport Projects (January 2022)



ADB eLEARN

Detecting and Preventing Integrity Violations in ADB Projects

Take the course now!

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

Evaluation



Scan

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.

Office of Anticorruption and Integrity



www.adb.org/integrity



@anticorruptionandintegrity



integrity@adb.org
anticorruption@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.