

THE INTEGRITY LEARNING SERIES



Anticorruption and Integrity Training

2 June 2026
Islamabad



Welcome



Thank you for being here today! The workshop will begin shortly.

Please register by scanning this QR code before we begin!

WELCOME

Meet your facilitators



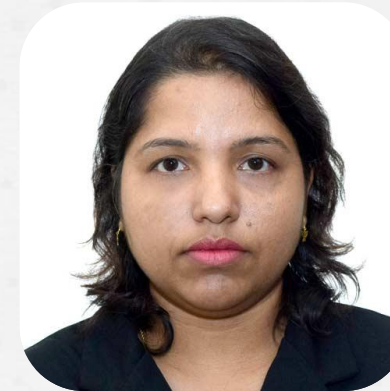
Chiawen Kiew

Advisor



Mark Rees

Principal Integrity Specialist



Jayneeta Prasad

Integrity Specialist

WELCOME

Some Housekeeping Rules



Be on time



Build relationships



Be optimistic we can make a better world



Share the stage



Use the tools



Raise confidential queries during breaks



Be present and focused



Be ready to be challenged and defer judgment

WELCOME

Objectives

-
- **Introducing** ADB's Anticorruption Policy and Investigation and Enforcement Framework **2:00–2:30 p.m.**

 - **Understanding** integrity violations and enforcement actions **2:30–3:15 p.m.**

 - **Identifying** issues in bid documents **3:15–4:30 p.m.**

 - **Building** a culture of Integrity **4:30–4:50 p.m.**

WELCOME

We will be using Mentimeter today

We will be using **Mentimeter** today because we would like to:



Hear from everyone

A simple way for the whole group to contribute



Learn from each other

See how colleagues across roles are thinking



Stay engaged

Short activities and check-ins support to reflection

WELCOME

About using Mentimeter

1. Use your phone to scan the QR code on the screen
2. Key in your response
3. Responses are anonymous



Scan the QR Code
Go to [menti.com](https://www.menti.com) and
enter code 7988 2996

WELCOME

Who is in the room today?



5 MINS



1. We are going to show a statement on the next slide, use Mentimeter to record your answers.

WELCOME

How long have you been collaborating on projects with ADB?



 5 MINS

New to the topic

Very experienced

WELCOME

How familiar are you with the topic of integrity violations on projects?



 5 MINS

New to the topic

Very experienced

WELCOME

Please choose the job description that best aligns with your current role

1. Senior Management
2. Middle Management
3. Technical Staff
4. Project/Program Staff
5. Administrative/Support Staff
6. Consultant/Contractor
7. Other



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WELCOME

Scenario: Where is the line for integrity?

There is an ongoing procurement for an MDB project; it is a National Competitive bidding. You work in Company A and are responsible for bid preparation. Your wife works in Company B and is also preparing their bid for the project. What should you do?

- A. Share the bid you have prepared and let your wife see how to best do it for Company B.
- B. Contribute to your wife's bid preparation as a dutiful husband.
- C. Let Company A know of the situation.
- D. Offer your wife guidance on how bids are prepared in Company A but share no bid information.
- E. Do nothing.



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01

Anticorruption and Integrity



SECTION 1

Anticorruption and Integrity

This session will cover:

- Importance
- Impact of Corruption
- Understanding ADBs Anticorruption Policy

SECTION 1



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


Featured Latest National News

NAB achieves record recovery of over Rs 4 billion in Kohistan Mega corruption case

2 Min Read

By Syeda Zarnab · January 29, 2026 · Save It

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SHARE

X

Summary

- The recovery stems from the Kohistan mega corruption scandal, in which the central accused, Qaiser Iqbal, allegedly used his frontman, Mumtaz Khan, a dumper driver, to siphon funds.
- After depositing Rs 4.05 billion in cash, assets, and vehicles into the treasury, Mumtaz Khan was released.
- Qaiser Iqbal is accused of using Mumtaz Khan to open bank accounts under a fake company's name, facilitating the transfer of substantial sums from the national treasury.

AI GENERATED SUMMARY

SECTION 1

Corruption Perception Index

ASIA Global Corruption Barometer

Score

28/100

Rank

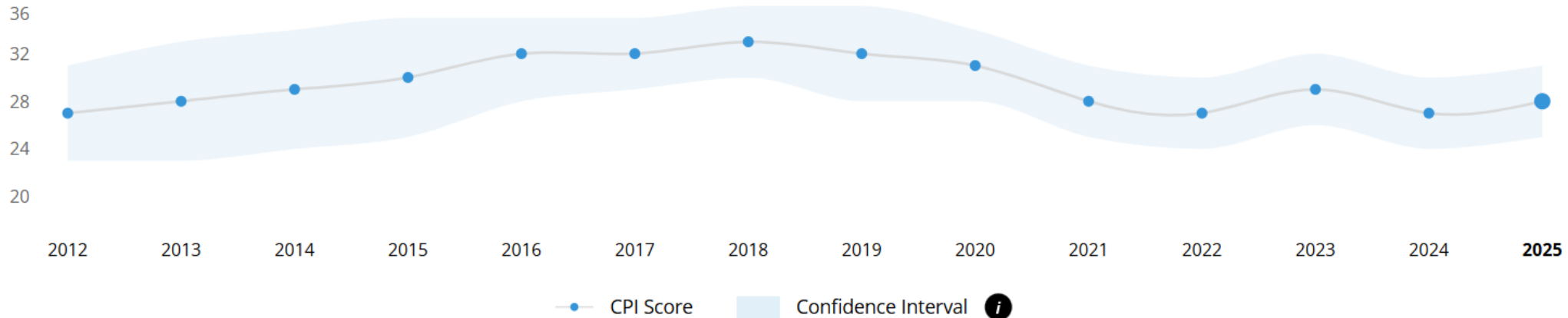
136/182

Score change

↑ +1 since 2024



NEARLY 1 IN 5 PEOPLE WHO USED A PUBLIC SERVICE IN THE PREVIOUS 12 MONTHS PAID A BRIBE



SECTION 1

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.

Download your copy from www.adb.org/integrity



SECTION 1

ADB's Anticorruption and Integrity Framework



Promote **effective and transparent** public administration, including good governance and capacity building.



Support efforts in the region through anticorruption dialogue with the DMCs.



Ensure that ADB projects and staff adhere to the **highest ethical standards**.

Corruption is essentially about giving or receiving something of value to influence a decision in an improper way.

SECTION 1

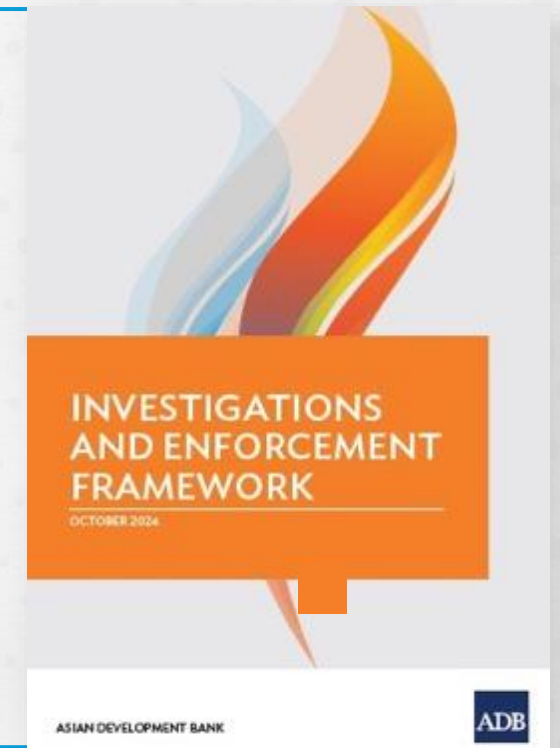
Investigation and Enforcement Framework

Contains the **principles and guidelines** that are used in the conduct of investigations. These rules are used by ADB's Office of Anticorruption and Integrity (OAI).

OAI assesses and investigates suspected violations of ADB's Anticorruption Policy committed in connection with an ADB related activity.

ADB related activity means an activity that ADB is, or is considering, directly or indirectly, financing, administering or supporting.

Specifies **enforcement and disclosure actions**, appeals process, reinstatement and release.



02

Understanding and Reporting Integrity Violations



SECTION 2

Integrity Violations

The following are integrity violations as defined by ADB:

MDB-Harmonized Definitions



Fraud



Corruption



Collusion



Coercion

Harmonized definitions enable mutual enforcement of debarment decisions across multilateral development banks.



Failure to disclose and manage a conflict of interest



Obstruction



Abuse



Retaliation Against Whistleblowers or Witnesses



Violation of Debarment



Failure to Adhere to the Highest Ethical Standards

SECTION 2

MDB Enforcement Actions



Debarment



Reprimand



Debarment with
conditional reinstatement



Restitution and / other
financial remedies



Conditional
Non-Debarment

SECTION 2

Consequences of Integrity Violations in ADB-financed Projects



Debarment of firms or individuals



Suspension of the loan or grant allocations



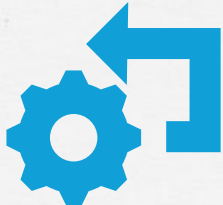
Termination of loan or grant allocations



Cross debarment



Return of misused loan or grant resources back to ADB



Changes of administrative arrangements



Request to **investigate or change** government staff

INSTITUTIONS



WORLD BANK GROUP

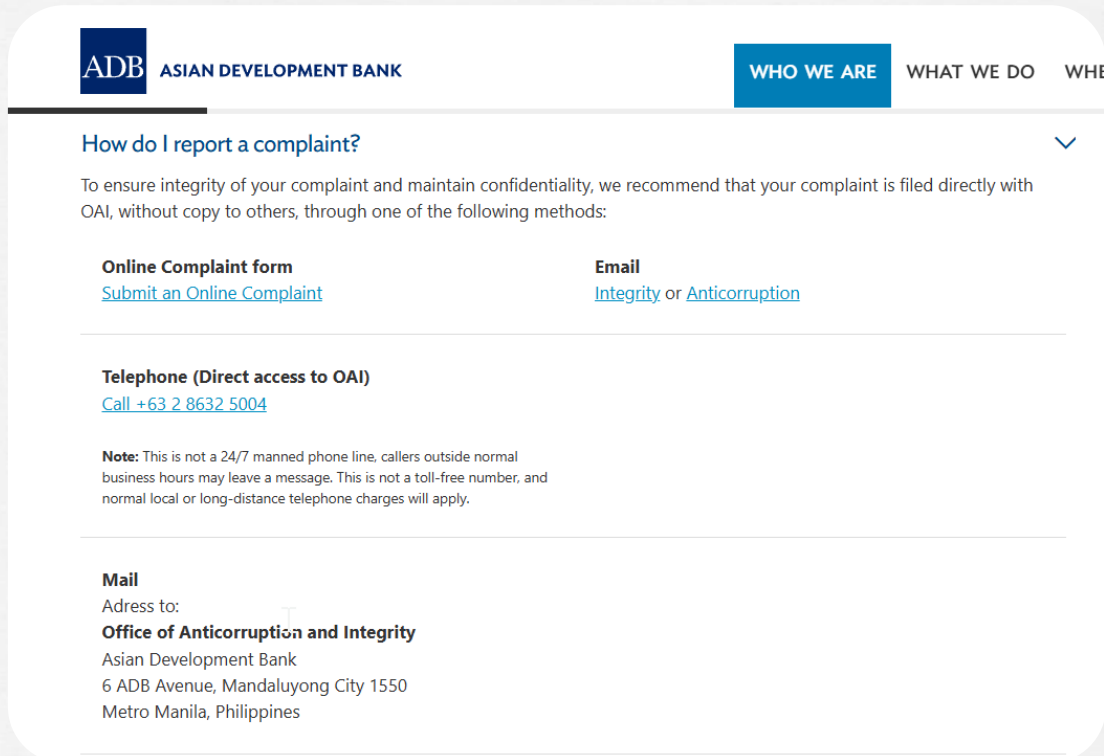
03

Reporting Integrity Concerns



SECTION 3

How do you report a suspected integrity violation?



ADB ASIAN DEVELOPMENT BANK WHO WE ARE WHAT WE DO WHE

How do I report a complaint? ▼

To ensure integrity of your complaint and maintain confidentiality, we recommend that your complaint is filed directly with OAI, without copy to others, through one of the following methods:

Online Complaint form
[Submit an Online Complaint](#)

Email
[Integrity](#) or [Anticorruption](#)

Telephone (Direct access to OAI)
[Call +63 2 8632 5004](#)

Note: This is not a 24/7 manned phone line, callers outside normal business hours may leave a message. This is not a toll-free number, and normal local or long-distance telephone charges will apply.

Mail
 Address to:
Office of Anticorruption and Integrity
 Asian Development Bank
 6 ADB Avenue, Mandaluyong City 1550
 Metro Manila, Philippines

Complaint Form

To report integrity violations, please provide as much information and detail as possible, including who, what, when, where, why, and how. For example:

- Who do you think committed the integrity violation? Who else might have been involved?
- What happened? Describe the events fully and using as much relevant detail as possible.
- When did it happen? Provide dates, time, and how many times.
- Where did it happen? Include the city and country, and, if possible, the actual address, the name of the building, and the office number.
- How does your allegation relate to ADB business? Was ADB staff involved?

If you have documents, photographs, or other physical and/or digital evidence of the alleged integrity violation, please send that information to OAI, via the Supporting Documents section below.

Contact Information

Allegations may be reported with attribution or anonymously. We encourage you, though, to provide us with some contact information so we may communicate with you. We assure you that all the information you will provide will be treated with utmost confidentiality.

<https://www.adb.org/who-we-are/integrity/report-integrity-violations#complaint>

SECTION 3

What should your report contain?



Related ADB activity - If your complaint relates to an integrity violation in an ADB project, identify the project (e.g., Loan XXXXX). You may also include the specific contract details, if known (e.g., Contract No. XXXXX).



Persons, entities involved - Indicate the names, designations, and contact information of the individuals and entities who committed the integrity violation, including their affiliation, if known.



Integrity violation - Identify what integrity violation occurred and describe how it happened. Account for all relevant details that are known to you. You may check the integrity violations and the examples listed under “What can I report to OAI?” reference.



Time and place - Provide the dates, times and addresses when and where the integrity violation occurred.



Supporting evidence - Along with your complaint, send evidence to support your allegations. If you are sending emails as evidence, we request that you send the original emails as an attachment. If your evidence is in a language other than English, we also request that you provide English translations as attachment when possible.

BREAK TIME (15 mins)

04

ADB Bid Declarations and Disclosure Obligations



SECTION 4

Why does the Letter of Bid matter?

A Letter of Bid is not boilerplate. It is a signed representation that may be relied upon for:

- a) Eligibility determinations
- b) Integrity and Sanctions screening
- c) Qualification and risk assessment (including pending litigation)
- d) Enforcement action if false or misleading

SECTION 4

Scenario

Company A, registered in Lao has decided to participate in an ADB financed Contract in Pakistan. This is the first time for Company A to bid for an ADB project. Company A engaged the services of a local Company B for \$15000 to help prepare its bid as it is unfamiliar with the local contexts and has been told that the local company will ease the bid preparation. Company A is very satisfied with the services of the local company and is interested in acquiring its services in the event it wins the contract. Company A is a reputable company with no sanctions against it by any MDB's, however in an administrative proceedings in Laos it was ordered to pay \$5 million for failing to execute a contract. Company A being aggrieved has appealed this decision and a decision is pending in Court.

SECTION 4

Instructions

In your assigned groups, use the provided ADB standard letter of bid and do the following:

- A. Discuss what additional steps each declaration requires you to do;
- B. What declaration you will be making as Company A; and
- C. Explain your reasons



30 minutes

SECTION 4

Eligibility and ADB Debarment Declaration

ADB's Letter of Bid template requires the bidder to declare (including JV partners and named third parties) that they are not subject to ADB debarment/suspension.

“Our firm, Joint Venture partners... [and] Subcontractors or Suppliers for any part of the contract who are named in the bid... are not subject to... a suspension or a debarment imposed by the ADB... or... enforced... under the Agreement for Mutual Enforcement of Debarment Decisions.”

Consequence of failure to declare: ADB's IEC has debarred an entity for 6 years for misrepresenting their eligibility and bidding while ineligible

SECTION 4

Sanction List Screening

ADB's Letter of Bid template includes a declaration that the bidder has screened relevant parties against ADB's sanctions register:

“We have checked all the parties mentioned... against ADB's Publicly Disclosed Debarment or Suspension Subregister accessed via <https://sanctions.adb.org/>.”

Practical meaning:

Screening should cover **your firm, JV partners, and named subcontractors/suppliers/service providers** as stated in the template

SECTION 4

Declaring Subconsultants and Agents

ADB's Letter of Bid template includes a declaration that:

"We have paid, or intend to pay, either directly or indirectly, the following commissions, gratuities, or fees with respect to the bidding process or execution of the Contract."

Practical meaning:

This declaration is a positive disclosure obligation, not a general integrity statement. It covers direct and indirect payments, including payments made through agents, intermediaries, consultants, or third parties.

SECTION 4

Pending Litigation Disclosure

ADB bidding documentation and forms require disclosure of pending litigation/arbitration, including per JV partner.

The requirement is to disclose pending litigation as specified, regardless of whether the party is a respondent or claimant. This includes declaring litigation that may not affect the bidder's capacity—whether it is 1% or 50%. If the form requires disclosure of all cases, then all cases must be declared.

Consequences of non-disclosure: ADB's IEC debarred an entity for four (4) years for non-disclosure, which constituted a fraudulent practice.

SECTION 4

Joint Venture Scope

ADB Letter of Bid template explicitly includes Joint Venture partners within the scope of integrity and sanctions declarations.

Operational implication:

The JV's signatory is effectively confirming that each JV partner (and named third parties) meet the declaration conditions.

Consequence of failure to declare: ADB's IEC has debarred an entity for 6 years for misrepresenting their eligibility and bidding while ineligible

SECTION 4

What should bidders do?

- Screen firm + JV partners + named subcontractors/suppliers against ADB's sanctions register.
- Confirm the bid forms covering subcontractors/suppliers are consistent with your declarations.
- Ensure litigation/arbitration forms are completed per bidder / per JV partner where required.
- Where the form asks for "if applicable, state details," treat that as a prompt to disclose, not a prompt to omit.

Consequence of failure to declare: ADB's IEC has debarred an entity for 6 years for misrepresenting their eligibility and bidding while ineligible

05

Business Integrity Programs



SECTION 5

Introduction to the MDB Harmonized Guidelines

- The MDB Harmonized Guidelines on Business Integrity Programmes were developed collaboratively by ADB, WB AfDB, EBRD, IDB and EIB
- The guidelines provide a non exhaustive principles for private sector entities involved in MDB financed projects.
- Aimed at encouraging the development and implementation of robust business integrity programs (BIPs).
- The guidelines are adaptable to entities of all sizes and help ensure that contractors and suppliers working on MDB-funded projects uphold high standards of integrity

SECTION 5

MDB Harmonized Principles on Business Integrity Programs

SCAN THE QR CODE



SECTION 5

Understanding MDB Harmonized Principles on Business Integrity Programs

- **Core Principles:** Risk assessment / Senior Integrity Function / Responsibility of Senior Management / Continuous Improvement
- **Internal Controls across Business Functions:** Employee compliance and management / Financial controls, approvals, and audits / High-risk transactions (i.e., gifts, political contributions, sponsorships) /
- **Reporting and Investigation:** Duty to Report / Whistleblower protection / Investigation and remediation measures
- **Business Partners:** Integrity due diligence / Contractual controls / Appropriate remuneration and payment



SECTION 5

ADB Reinstatement of Companies

- ADB requires sanctioned parties, as a condition for reinstatement/release from sanction, the adoption and implementation of a business integrity program
- OAI often requires engagement of monitors to help the companies develop and implement business integrity programs
 - OAI approves the selection of the monitor
 - OAI approves the scope of work and termination of the monitor
- OAI's Investigations Division reviews the Monitor's Periodic and Final Reports to determine compliance with requirements
- If OAI determines the company does not meet the requirements for reinstatement, the company can appeal the decision to the Investigations Enforcement Committee

Year	Total Entities reinstated
2018	108
2019	284
2020	264
2021	371
2022	221
2023	312
2024	125
2025	3
Total	1688

SECTION 5

Reinstatement Example

A major SOE and its 39 affiliates had been debarred for 2 years for fraudulent practice. In 2023, the firm was reinstated after it had completed its minimum debarment period and complied with the conditions of reinstatement:



It had **implemented a business integrity program, integrity related policies and protocols** across all its subsidiaries and branches;



Facilitated training to staff in relation to bid preparation and procurement procedures adhering to ADB's Anticorruption Policy and IPG; and



Disciplined staff members involved in the fraudulent practice.



Session Wrap-Up

SESSION WRAP-UP

Recap



Uphold highest ethical standards



Know your partner



Identify and mitigate risks, report and investigate misconduct.



Build awareness and capacity in your entity



Report integrity violations to OAI

SESSION WRAP-UP

What is one thing you will do differently after this training?



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SESSION WRAP-UP

References



OUR FRAMEWORK Policies and Strategies

ADB

ANTICORRUPTION

Asian Development Bank



INVESTIGATION AND ENFORCEMENT FRAMEWORK

OCTOBER 2024

ASIAN DEVELOPMENT BANK

ADB



Scan the QR code or visit bit.ly/ief-adb



Integrity Risks and Red Flags Series



Scan the QR code or visit bit.ly/ADBintegritylessons

SESSION WRAP-UP

Evaluation

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.

SCAN THE QR CODE



SESSION WRAP-UP

Connect with OAI.



www.adb.org/integrity



@anticorruptionandintegrity



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integrity@adb.org



ADB Anticorruption and Integrity



Report integrity violations:

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



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

Integrity is your responsibility, do not assume that someone else is doing it. Thank you for your commitment to integrity.

Together, we make a difference.