ADB Office of Anticorruption and Integrity

The Integrity Learning Series

Anticorruption and Integrity Training

India

Sheeva S. Mercado
Senior Integrity Officer

Eliane C. Miranda
Associate Integrity Officer

4 February 2026
Online Session

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Reminders

The session is being recorded.

Reserve questions at the end of the presentation.

Please remain on mute if not speaking.

What to expect

I. India – Integrity Landscape
II. ADB's Anticorruption and Integrity Framework
III. Integrity Violations
IV. Enforcement Actions and Impact
V. Recognizing and Reducing Risks
   I. Red Flags
   II. Due Diligence
VI. Strengthening a Culture of Integrity

Objectives

Understanding the cost of corruption and the roles and responsibilities of different stakeholders

Identifying and mitigating integrity risks

Strengthen a culture of Integrity

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I. India – Integrity Landscape

ADB supports India’s sustained economic growth by financing robust and inclusive infrastructure, well-managed urbanization, efficient logistics, social investments, and green initiatives aligned with its climate action agenda.

Corruption Perceptions Index (2024)

INDIA

Score

38/100

Rank

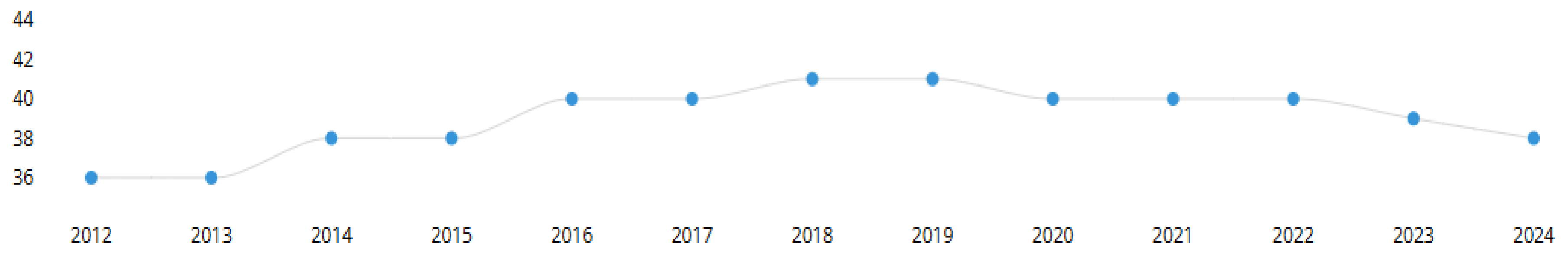
96/180

Score change

-1 since 2023

India may be losing up to **USD 15 – 20 billion** per annum to corruption.

Score changes 2012 - 2024



Corruption Sentiments (2024)

ADB

89%

Corruption in government is a problem.

39%

Paid a bribe in the last year.

56%

Citizens' actions can help curb corruption.

II. ADB's Anticorruption and Integrity Framework

ADB's Anticorruption and Integrity 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.**

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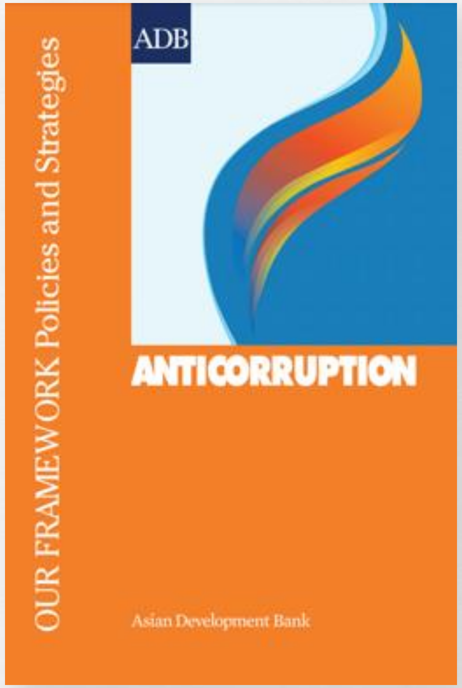
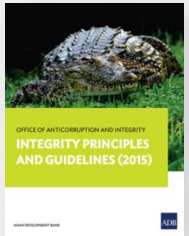
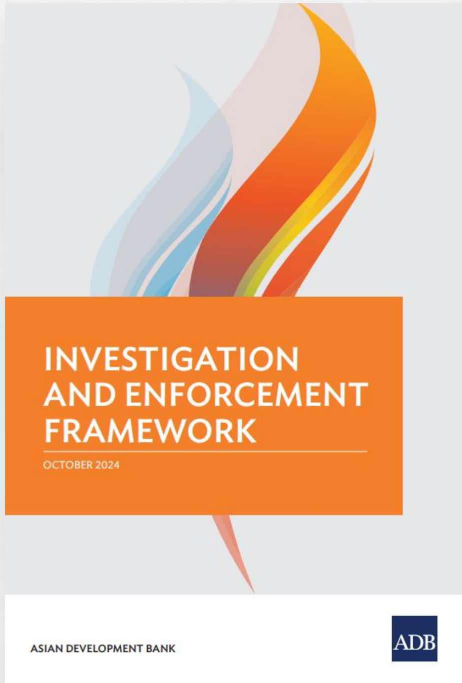
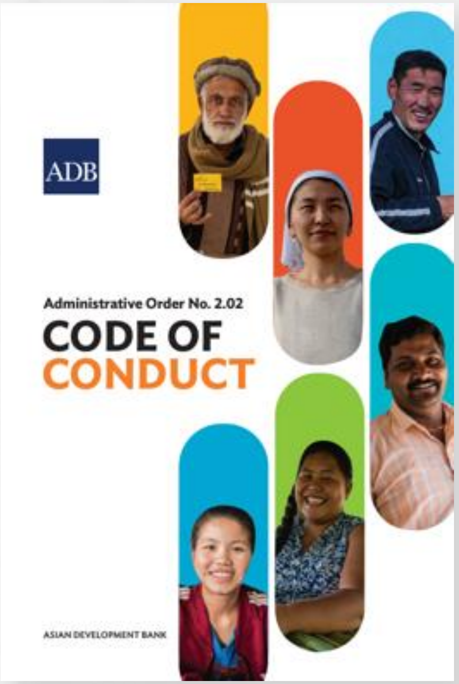
ADB's Anticorruption and Integrity Framework









Highest Ethical Standards

Zero Tolerance

What are Integrity Risks?

Integrity Risk

Is the risk that a person or entity involved in ADB activities is implicated in financial or other ethical misconduct, resulting in potential adverse impacts on ADB.

Such misconduct includes any act which violates ADB's Anticorruption Policy, namely corrupt, fraudulent, coercive, or collusive practice, and other integrity violations as defined.

Such misconduct also encompasses other improper activity, including money laundering, terrorist financing, tax evasion, and predicate offences as defined by international standards in relation to financial crime risks.

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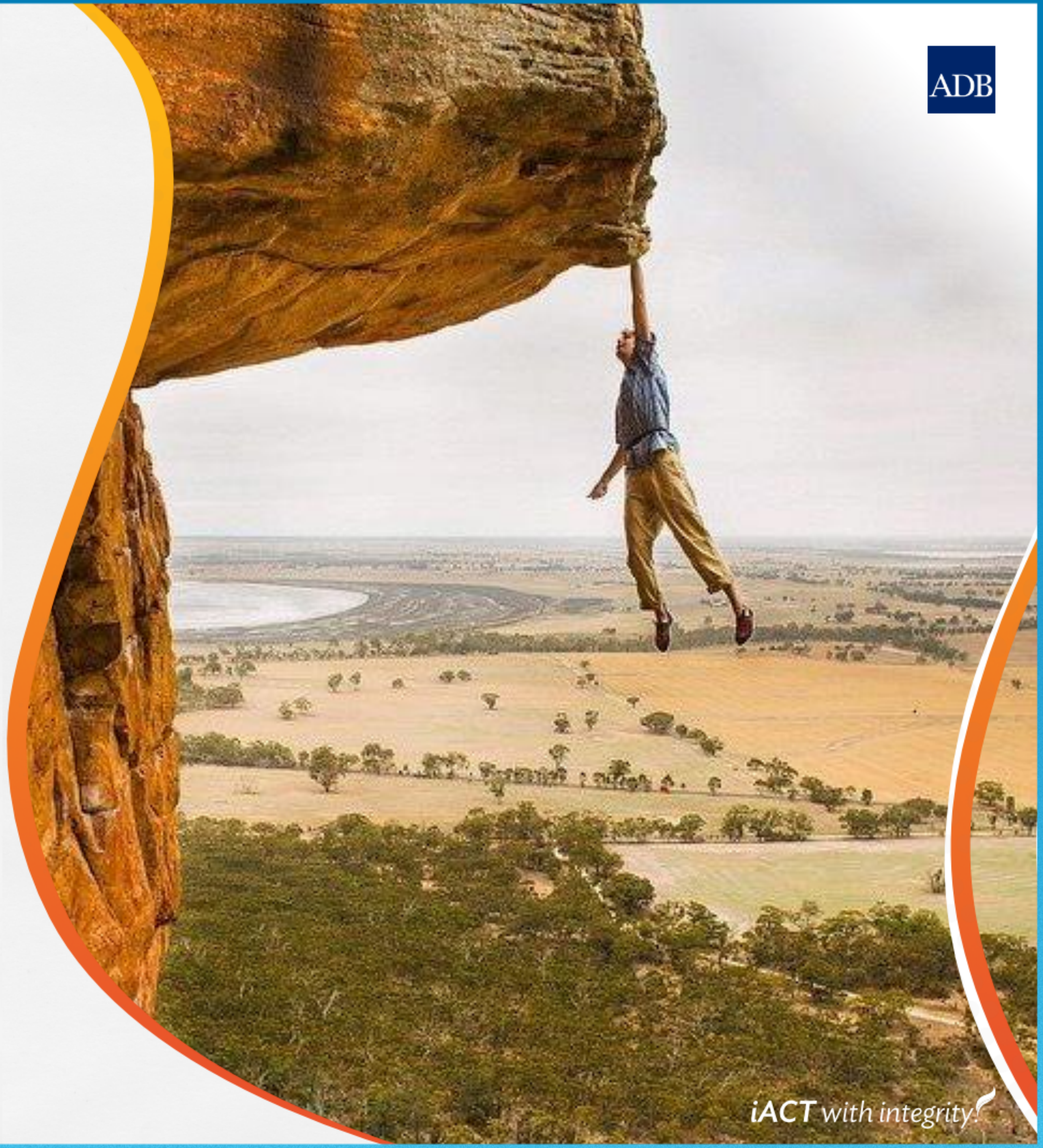
Reputational Risk and Integrity Risk

ADB depends on its reputation to achieve its mandate.

Reputational risk may be considered as the risk that ADB's stakeholders and/or the communities where ADB operates, lose confidence in, and respect for, ADB and its ability to achieve its development mission.

ADB's association with persons who may have engaged in financial or ethical misconduct (integrity incidents), even misconduct unrelated to ADB activities, can damage ADB's reputation.

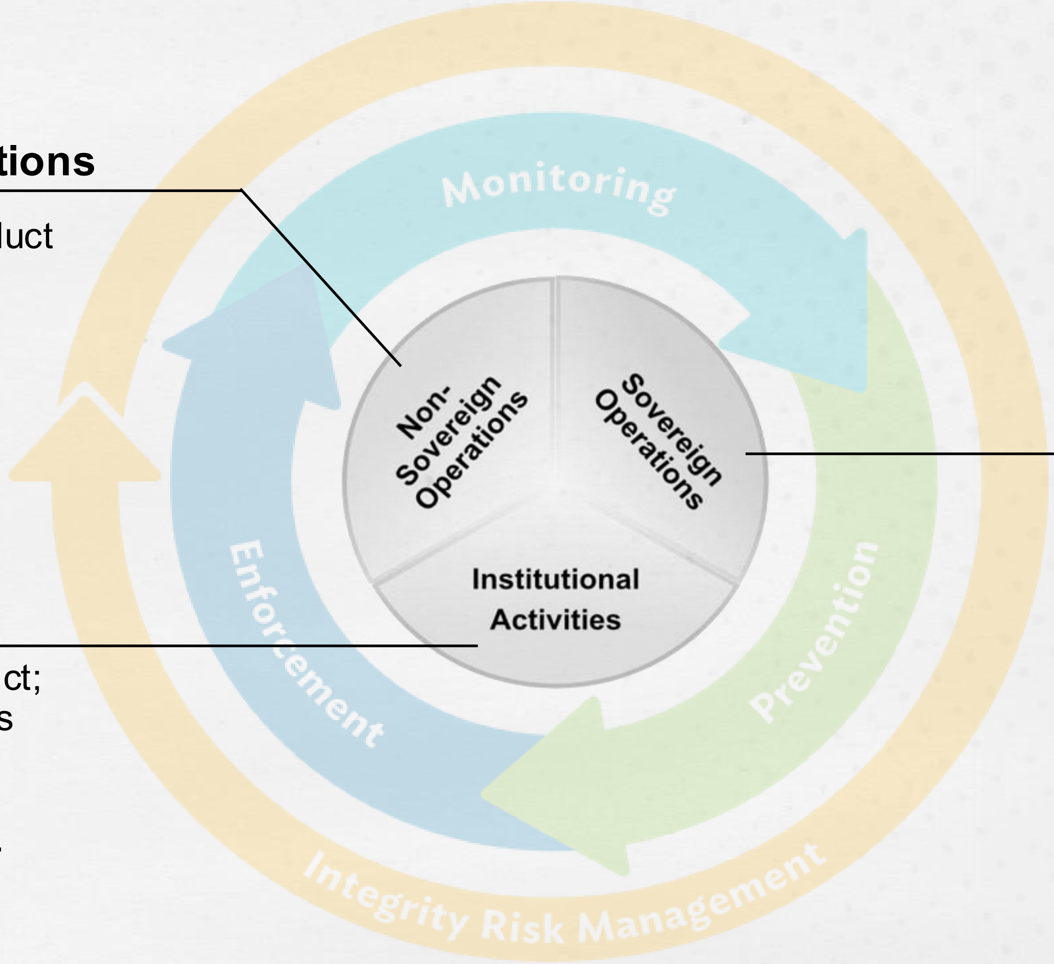


ADB’s Exposure to Integrity Risk

ADB's Exposure to Integrity Risk

ADB Non-Sovereign Operations

Financial or other ethical misconduct of ADB counterparties or their significant contracting entities



ADB Sovereign Operations

PEPs, conflicts of interest, limited integrity risk management capacity, poor internal control environment, weak tendering processes, poor personnel integrity of EAs/IAs

ADB Institutional Activities

Hiring practices; employee conduct; actions of contractors, consultants and vendors; conduct of treasury banks and local banking service providers; outreach activities; etc.

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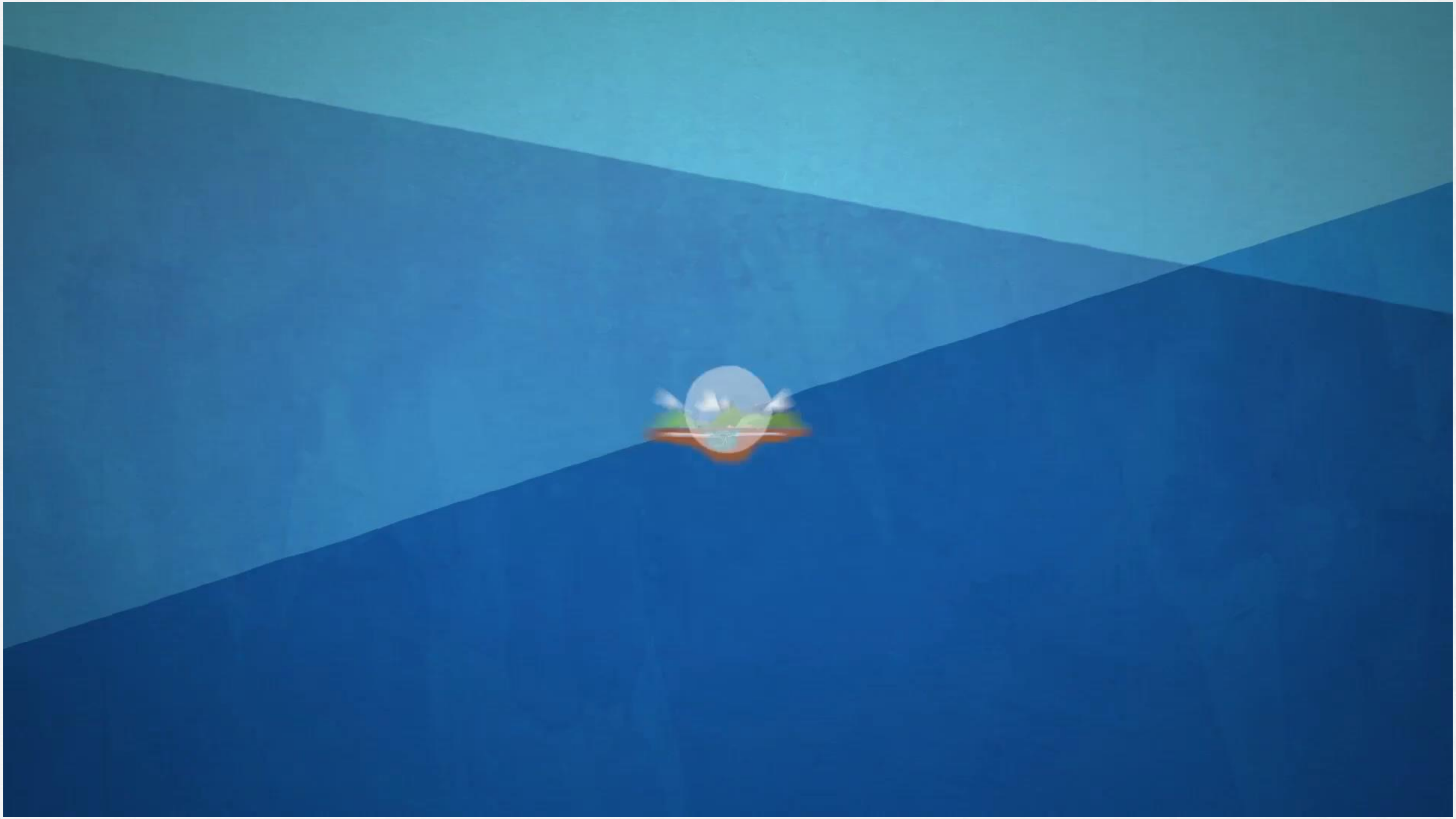
Zero tolerance does not mean zero occurrence

III. Integrity Violations



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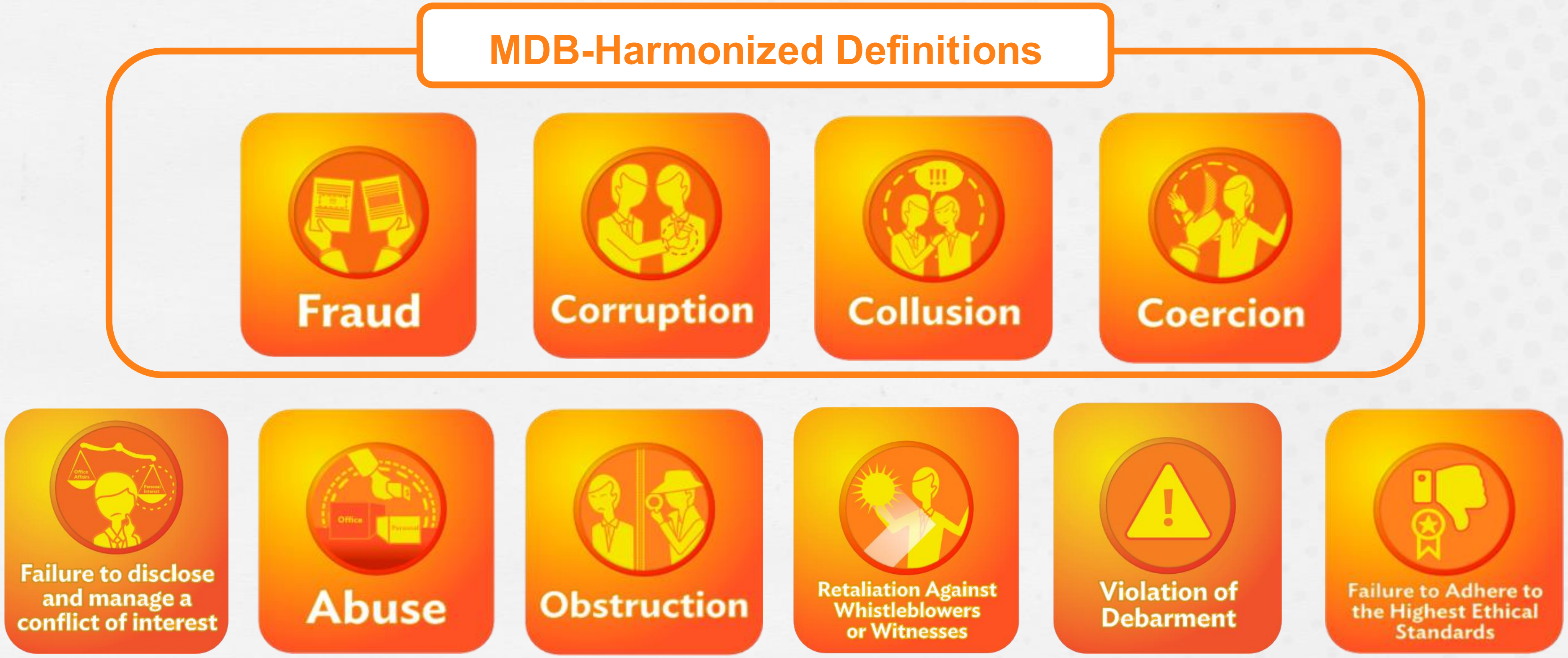
Integrity Violations



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IV. Enforcement Actions and Impact

- Enforcement and Disclosure Actions
- Consequences of Integrity Violations in ADB-supported Projects
- Impact while under Debarment

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

Enforcement and Disclosure Actions

Debarment

Debarment
with conditional reinstatement

Conditional Non-Debarment

Reprimand

Restitution and / other financial remedies

ADB Debarment and Suspension Register

ADB

http://sanctions.adb.org

ADB 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.

PUBLISHED LIST
Accessible to the public

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.

Other Information

- Application
- Temporary Suspension
- Debar
- Contr

COMPLETE LIST

Password-protected, accessible to:

- ADB staff
- BoD
- Parties with a "need to know": international organizations, bilateral and government partners
- EAs and IAs

Consequences of Debarment

Current contracts	Contract variations	Reinstatement	Future tenders
MAY CONTINUE	**OAI APPROVAL**	**NOT AUTOMATIC**	**NOT PERMITTED**

Investigations – ADB Projects in India

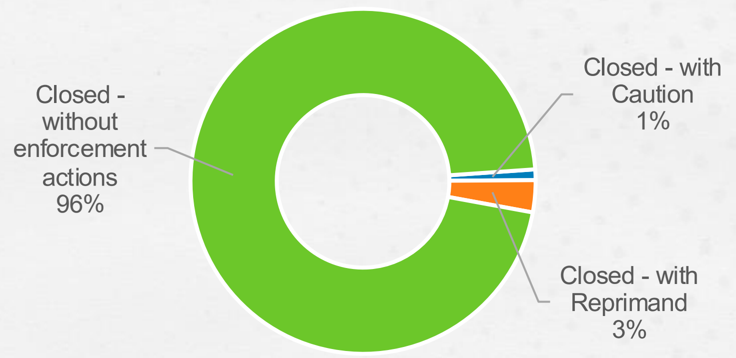
Volume of Complaints

2016 to 2025

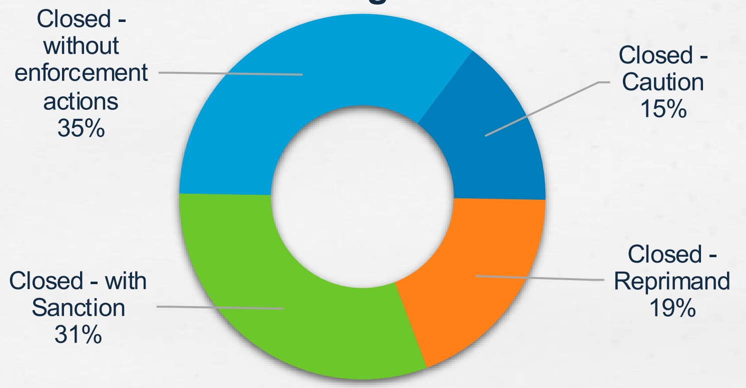
180
Complaints closed

42
Investigated further

Disposition - Closed Complaints



Disposition - Closed Investigations



As of 31 December 2025, there are 22 ongoing cases related to projects in India

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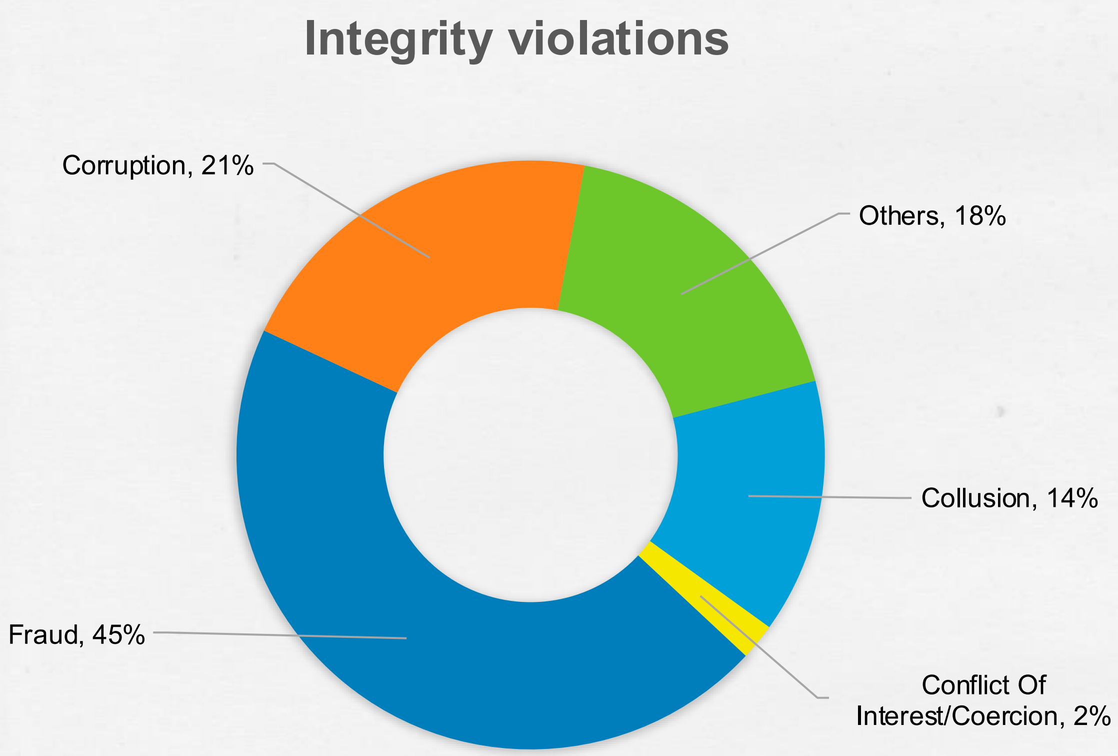
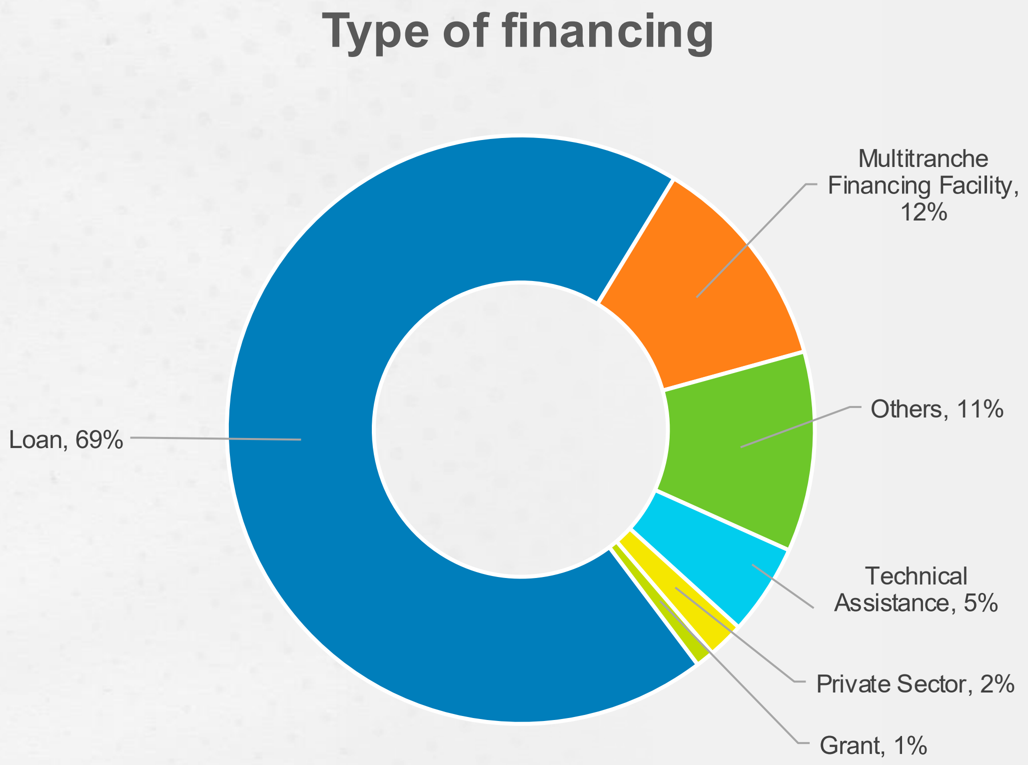
Investigations – ADB Projects in India





V. Recognizing and Reducing Risk

- **Red Flags**
- Due Diligence

Be alert to the **red flags** of integrity risks.

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Project Implementation Processes

ADB

Procurement

Bidding
Prequalification; preparation of bidding documents; 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.

Red Flags in Bidding

ADB

Ineligible Bidders

In a rebidding, the bid evaluation committee decided that three suppliers were substantially responsive to the bidding requirements.

However, ADB had **debarred** two of these suppliers.

The remaining supplier (i) appeared to be **related** to the two debarred suppliers, (ii) purchased bidding documents on the day of the bid submission deadline, and (iii) submitted a bid to create an illusion of competition.

Leakage of Confidential Information

Negotiations between the project management unit and the supplier were initiated two months before quotations from other suppliers were sought.

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Red Flags in Bid Evaluation

ADB

Financial Capacity

Outdated financial statements were submitted to support bidder's financial capacity.

Financial statements from different years have identical data.

Value of a bidder's cash and cash equivalents declared in the bidding form was higher than the value in the submitted audited financial statements.

Unaudited financial statements were accepted without first confirming whether the laws in the bidders' countries or jurisdictions required audited statements.

Unsupported credit lines.

Different bidders having identical credit lines.

Red Flags in Bid Evaluation

ADB

Pending Litigation

Bidder did not disclose its pending litigation as indicated in the notes to the financial statements. ⚠

Personnel

Using personnel from debarred entities.
More on the next slide… ⚠

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Fake CVs or credentials

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V. Recognizing and Reducing Risk

- Red Flags
- **Due Diligence**

WHY?

WHO?

WHEN?

WHAT?

Factors in Conducting Due Diligence

ADB

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

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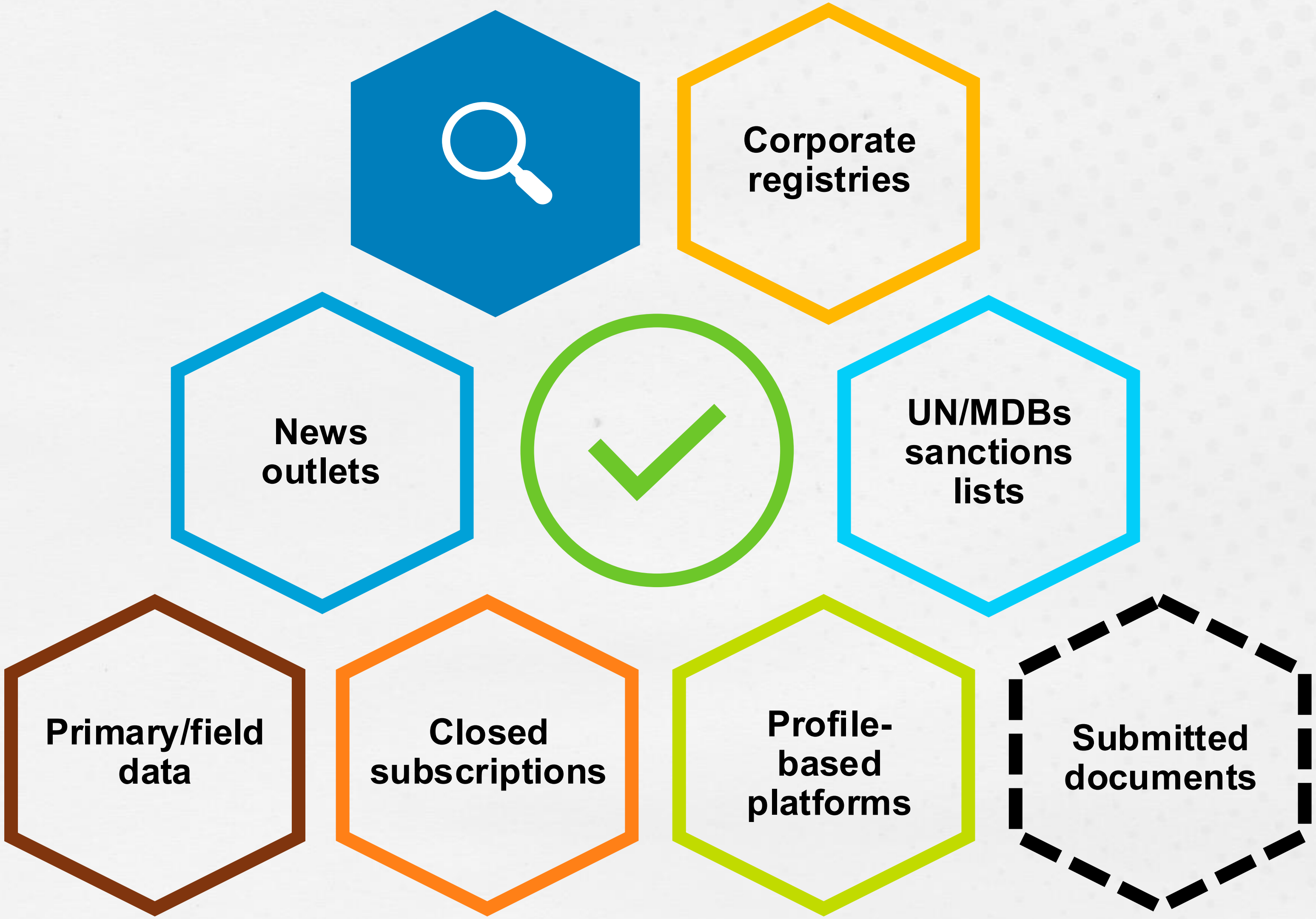
Conduct Due Diligence: Sources



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Conduct Due Diligence: Verification

- Contact references
- Verify employment history
- Check educational credentials
- Verify professional certifications
- Interview
- Check reputation and reviews
- Verify technical skills
- Conduct background checks
- Check online presence

Steps in Performing a Risk Assessment

Conduct Integrity Due Diligence

Identify the Risk

Can You Mitigate the Risk?

Due Diligence → Risk Assessment → Mitigation

Steps in Performing a Risk Assessment

ADB

Conduct Integrity Due Diligence

Identify the Risk

Identify potential threats that could impact project objectives, resources, or timelines.

Can You Mitigate the Risk?

Steps in Performing a Risk Assessment

Conduct Integrity Due Diligence

Identify the Risk

Can You Mitigate the Risk?

Reduce the likelihood or impact of identified risks by developing and implementing controls that minimize or eliminate them.

Risk Identified → Risk Mitigation

1. ADB-debarred or 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. You notice an unusually low bid (but still technically responsive) from a contractor.

   → Project evaluators should compare the bid price against the engineer's estimate, other substantially responsive bids, and prices from similar recent contracts to identify inconsistencies. Request clarification, evaluate the explanation, and decide on action.

Risk Identified → Risk Mitigation

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Access to the Debarment Register

ADB

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

Executing & Implementing Agencies are Responsible for Sanctions Screening.

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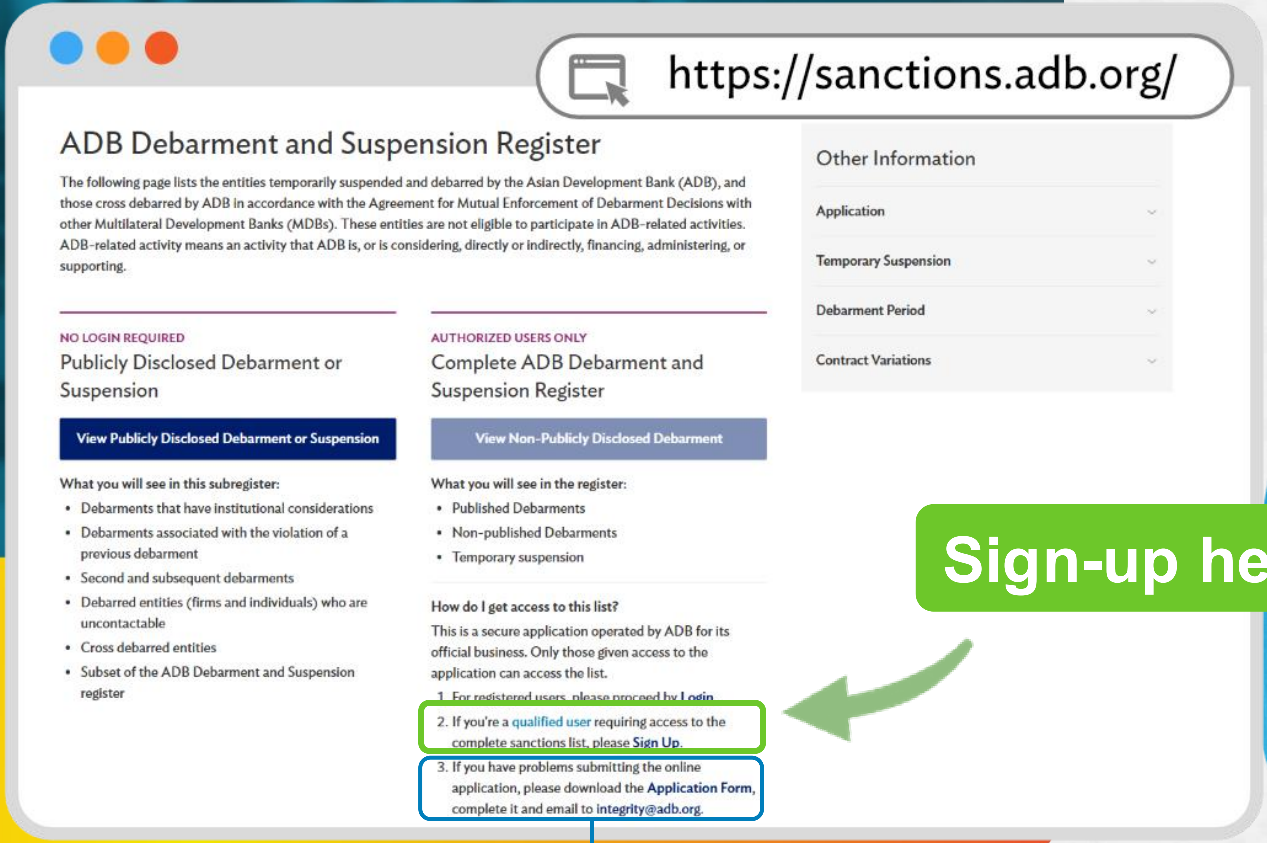
Conducting Due Diligence: Debarment Checks

ADB

Ensure that EAs/IAs have signed-up!

Sign up by visiting the site or scanning the QR code.



Sign-up here

Manual form available

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Conducting Due Diligence: Debarment Checks

ADB

Login Sign Up

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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.

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VI. Strengthening a Culture of Integrity

Champion Anticorruption and Integrity

Ensure counterparties are not **debarred.**

Verify at every step.

Raise integrity concerns if found.

Integrity Risk Management is everyone's responsibility.

Do not assume that someone else is doing it.

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Recap

Know your partner.

Leverage technology for due diligence.

Identify and mitigate risks, support your partner in mitigating risks.

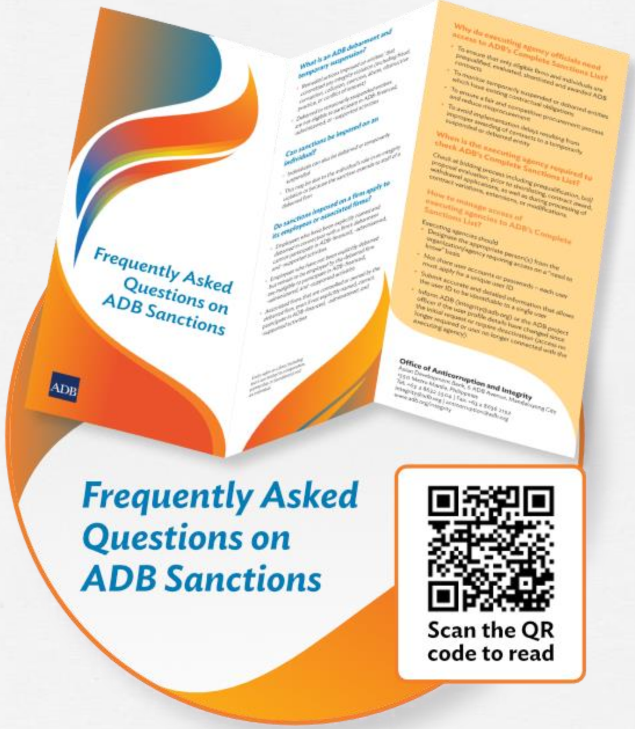
EAs/IAs to:

i. Sign up for access to ADB's complete Debarment and Suspension Register.

ii. Do the debarment checks.

Report integrity violations to OAI

Other Resources



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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

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ADB

Thank you!

www.adb.org/integrity

integrity@adb.org

+63-2-8632 5004

@anticorruptionandintegrity

@adb_oai

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.

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