



Office of Anticorruption and Integrity

Integrity Learning Series

# ADB Anticorruption and Integrity Training

*Loan 4680-TUR: Post Disaster Municipal Services Improvement and Resilience (Sector) Project*

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Office of Anticorruption and Integrity

15 April 2026

iACT with integrity!



# Overview and Introduction

Welcome

# Some Housekeeping Rules



Build relationships



Participate



Be optimistic we can make a better world



Raise confidential queries after the session



Share the stage



Be present and focused



Session is being recorded



Be ready to be challenged and defer judgment

# Introduction

*You are in this room because you play an important role in contribution to how the public views and trusts our institutions*


## What this session covers?

1. ADB's anticorruption and integrity framework
2. Preventing integrity violations and corruption
3. What happens when integrity violations are detected
4. Strengthening a culture of integrity.

## By the end of this session, you will be able to:

1. Explain why integrity and reputational risks matter in Projects through ADB's anticorruption and integrity framework
2. Apply practical due diligence basics, and know when and how to report suspected integrity violations
3. Recognize common integrity violations and red flags, including remedial actions that can be taken by ADB.

# Who is in the room today?


 2 mins



1. Get ready to participate
2. We are going to put a statement on the next slide
3. Raise your hand when the statement applies to you

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



 2 mins

New to the Topic

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




🕒 2 mins

Somewhat Familiar

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



 2 mins

Experienced

# Scenario: Where is the line for integrity?

🕒 3 mins




*You find a wallet on the street containing a large sum of money and the owner's ID. What would you do?*

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*What would you do?*


 3 mins



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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?

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 3 mins

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3. Contribute to developing or refining the selection criteria for the role
4. Let the selector know that your friend is applying and provide a recommendation at the same time
5. Offer advice on how selection panels usually assess candidates, based on your experience

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# What does this tell us about Integrity?

We will focus on how to build your capabilities in **identifying, assessing, mitigating, and managing** integrity risks in ADB financed activities.



FRAUD



CORRUPTION



COLLUSION



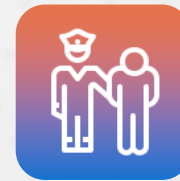
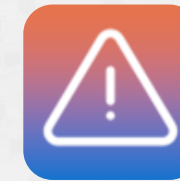
COERCION



OBSTRUCTION

FAILURE TO DISCLOSE AND  
MANAGE  
CONFLICT OF  
INTEREST

ABUSE

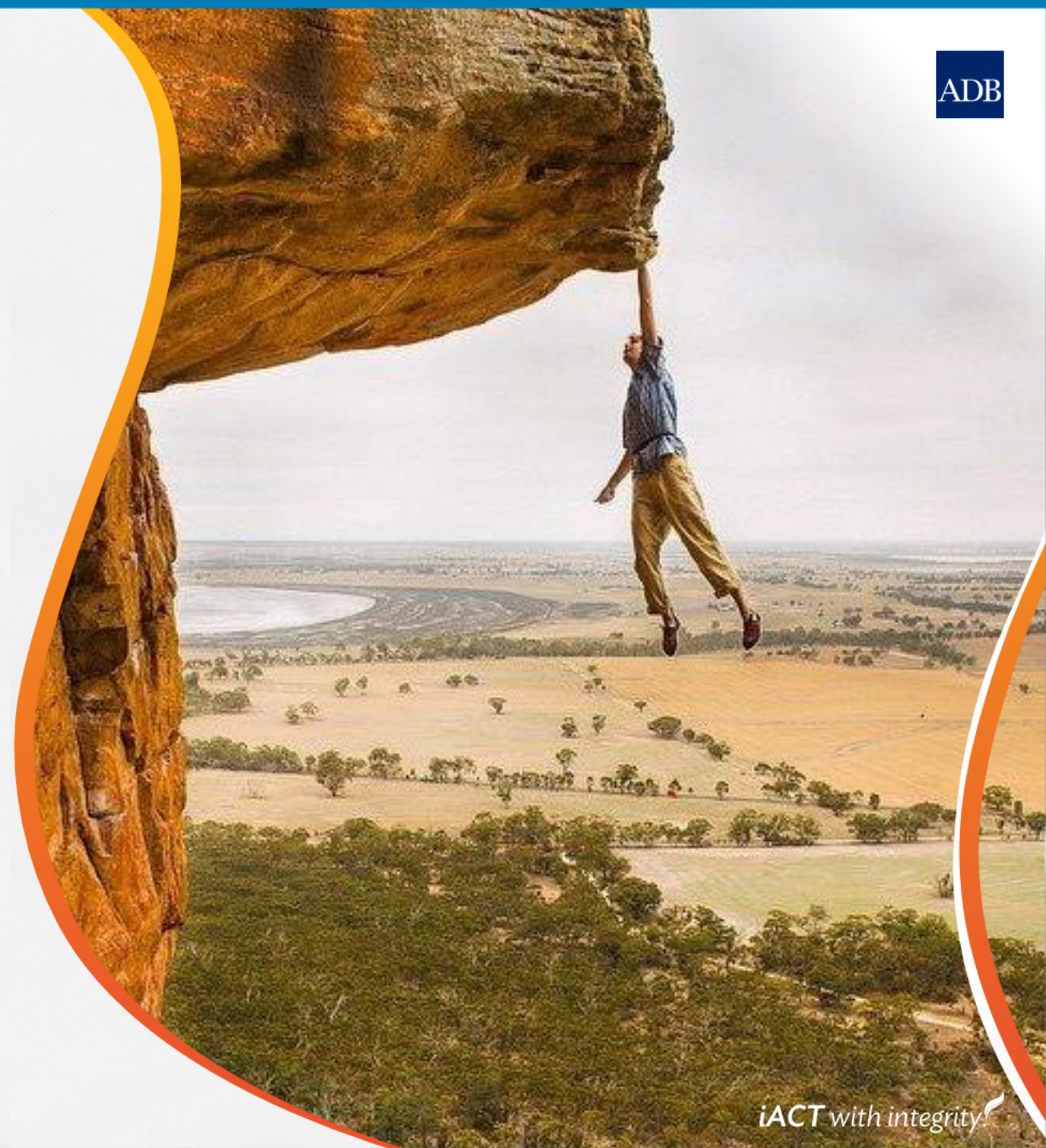
RETALIATION  
AGAINST  
WHISTLOWE  
RS OR  
WITNESSESVIOLATION OF  
DEBARMENTFAILURE TO  
ADHERE TO  
THE  
HIGHEST  
ETHICAL  
STANDARDS

# 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 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.



# Integrity, ADB and You

## Section 1

# Why do the Highest standards of integrity matter on ADB Projects?



It protects development impact .



It supports better decision making .



It strengthens trust .



It protects you and the institution .



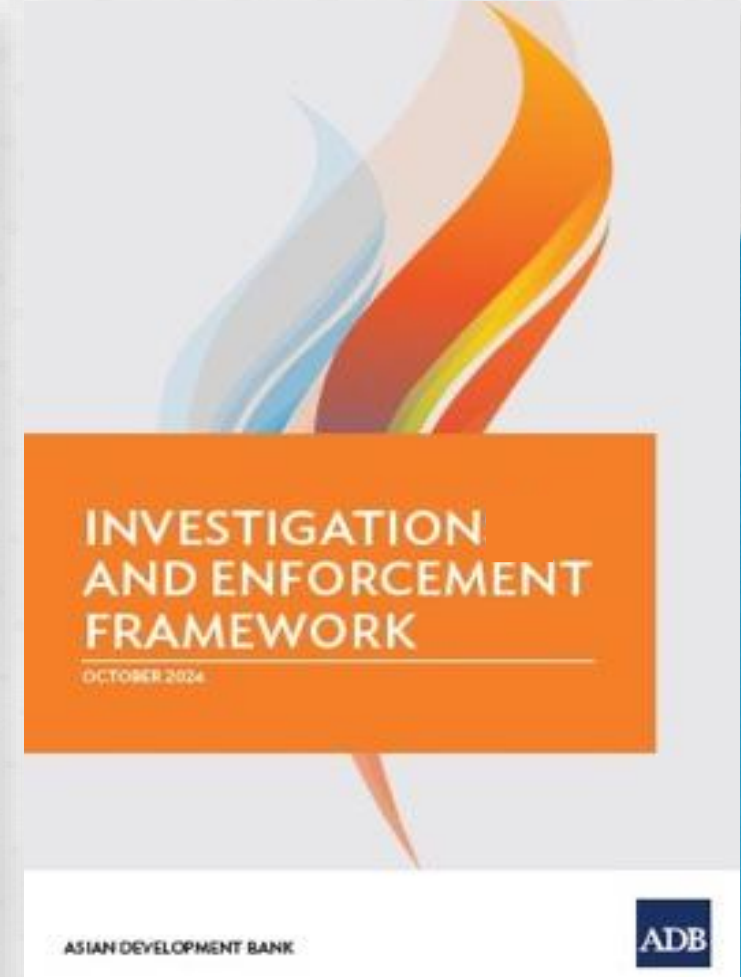
It saves time and effort .

# 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.

Find your copy on:

[adb.org/who-we-are/integrity](https://adb.org/who-we-are/integrity)



# ADB's Anticorruption and Integrity Framework



Promoting **effective and transparent** public administration including good governance and capacity building



Supporting efforts in the **region** through anticorruption quality dialogue with the DMCs



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



**Zero Tolerance**

ADB defines **corruption** as the **abuse of public or private office for personal gain**

# How does this relate to you?

## EAs/IAs involved in ADB-supported activities

Conduct integrity due diligence, spot red flags, manage integrity risk, and escalate to OAI where necessary

## ADB Project Team

Your first point of support for identifying and managing integrity issues on the ground

## Office of Anticorruption and Integrity (OAI)

Provides advisory support on integrity due diligence, investigations, and builds integrity capability

## Auditor General

Independent audit of ADB's integrity risk management



# Your Role as Executing and Implementing Agencies

This includes:



**Report suspected violations** to OAI when found in ADB projects.



**Support OAI** as partners to identify and manage elevated integrity risks



**Trust, but verify** - especially in areas prone to abuse (finance and administration, tax privileges, personal use of ADB resources)



**Cooperate** with OAI investigations



**Champion** strong integrity due diligence practices at your team level



**Encourage and participate in conversations** about integrity red flags and violations in your team

# Preventing integrity violations and corruption

## Section 2

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 CONFLICT OF INTEREST



ABUSE



RETALIATION AGAINST WHISTBLOWERS OR WITNESSES



OBSTRUCTION



VIOLATION OF DEBARMENT



FAILURE TO ADHERE TO THE HIGHEST ETHICAL STANDARDS

# We need a strong system to manage integrity risk

A system ensures that risks identified are assessed, mitigated, managed, and monitored, so that decisions are made in full knowledge of integrity risks, enabling informed, defensible, and transparent decision-making.

Many integrity risks can be managed or mitigated.

# We need a strong system to manage integrity risk

## Strong integrity due diligence process

A systematic, repeatable integrity due diligence process that:

- Uses good data;
- Maintains clear documentation and
- Enables defensible decisions.

## Spotting red flags early

Continuous processes to monitor and identify red flags.

Escalating a red flag is good risk management, not an accusation.

## Assessing and managing risk

Once a red flag is identified, it is important to:

- Understand what it may mean for the process or project
- Assess potential integrity risks
- Take proportionate risk-mitigation or preventive actions

## Escalation and reporting

Where there are significant allegations and indications that an integrity violation may have occurred, these must be escalated and reported to OAI.

## Investigations and enforcement action

Consequences may include contractual remedies, corrective actions, or strengthened controls that reinforce accountability and deter future misconduct.

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# Integrity Due Diligence in Practice

Structured process for identifying, assessing and monitoring Integrity Risk prior to decision making.



Identify  
(Screen)



Assess



Monitor

# Integrity Due Diligence in Practice

Screening is the first step to integrity due diligence.

# What risks do you need to screen for?



Weak Governance or  
Compliance Controls



Unclear Ownership or  
Source of Wealth



Political Connections or  
Influence Risks



Fraud or Corrupt  
Practices



Criminal or Financial  
Crime Indicators



Environmental or Social  
Harm Concerns



Regulatory Breaches or  
Legal Disputes



Sanctions or  
Restricted Party  
Exposure

# Sources of Integrity Due Diligence Information



Section 2

# Screening for debarments through ADB's complete debarment and suspension register

<http://sanctions.adb.org>

The screenshot shows the ADB Debarment and Suspension Register page. At the top, there is a navigation bar with links for Home, ADB Debarment and Suspension Register, Resources, Other Sanctions Lists, and Contact Us. The main heading is "ADB Debarment and Suspension Register". Below this, a paragraph explains that the page lists 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). The page is divided into two main sections: "Publicly Disclosed Debarment or Suspension" and "Complete ADB Debarment and Suspension Register".

**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.

**COMPLETE LIST**

Password-protected, accessible to:

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

Section 2

# Screening for debarments through ADB's complete debarment and suspension register

 <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.

**NO LOGIN REQUIRED**  
Publicly Disclosed Debarment or Suspension

**AUTHORIZED USERS ONLY**  
Complete ADB Debarment and Suspension Register

[View Publicly Disclosed Debarment or Suspension](#)

[View Non-Publicly Disclosed Debarment](#)

**Other Information**

- Application
- Temporary Suspension
- Debarment Period
- Contract Variations

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**Sign-Up Here**

**Manual Form Available**

Section 2

# Screening for debarments through ADB's complete debarment and suspension register



<http://sanctions.adb.org>

**Publicly Disclosed Debarment or Suspension**

This is ADB's publicly disclosed debarment or suspension register. It contains the names of entities who violated the sanctions while ineligible; entities who committed second and subsequent violations; debarred entities who are uncontactable; and [cross debarred entities](#).

Search:  Entity Type:  Sanction Type:  Nationality:  Cross-Debarred:

Entity Type	Name ↑	Address ↓	Sanction Type	Other Name / Logo	Nationality	Effect Date   Lapse Date	Grounds ↓	Changes Made on
Individual	...	...	...	...	...	...	...	...
Individual	...	...	...	...	...	...	...	...
Individual	...	...	...	...	...	...	...	...
Individual	...	...	...	...	...	...	...	...
Individual	...	...	...	...	...	...	...	...
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Individual	...	...	...	...	...	...	...	...
Individual	...	...	...	...	...	...	...	...

# Screening for debarments through ADB's complete debarment and suspension register

## Search Functionality

The screenshot shows the ADB Debarment and Suspension Register search page. At the top, the ADB logo and navigation menu are visible. The main heading is "Complete ADB Debarment and Suspension Register". Below this is a search bar with a magnifying glass icon and a search button. To the right of the search bar are four dropdown menus: "Entity Type", "Sanction Type", "Nationality", and "Cross-Debarred". Below the search bar is a table with columns: "Entity Type", "Name", "Address", "Sanction Type", "Other Name / Logo", "Nationality", "Effect Date | Lapse Date", "Grounds", and "Changes Made on". A green callout box with a magnifying glass icon points to the search bar and contains the text "Search names using the search bar".

**TO NOTE**

- 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

Section 2

# Screening for UN Security Council Sanctions

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).

 <https://main.un.org/securitycouncil/en/content/un-sc-consolidated-list>



# Verify Integrity Due Diligence Information Collected



# Integrity Due Diligence in Practice

The Integrity Due Diligence Process is not Static. It's a continuous activity, what you research can change and evolve over time .

# Detecting Integrity Violations and Reporting Them to ADB

## Section 3

# Detecting Integrity Violations

Understand how to spot, and how red flags may show up in your own work



These sub-processes reflect those assessed by OAI but do not necessarily reflect all sub-processes that exist within each process.

# Red Flags: Procurement

The following are illustrative examples only. Red flags are not definitive indicators of wrongdoing and should be assessed in context.



Procurement



Bidding



Bid evaluation



Contract award

## Bidding

- ▲ **Only one bid received**  
May indicate bid-rigging, pre-selection, or barriers that suppressed competition.
- ▲ **Identical or near-identical bid prices**  
Classic indicator of collusion - bidders may have agreed in advance who will win.
- ▲ **Specifications too vague or too narrow**  
Overly broad specs increase discretion; overly narrow ones may be tailored to favour one firm.

# Red Flags: Procurement

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Procurement

🚩 Bidding

🚩 Bid Evaluation

🚩 Contract award

## Bid Evaluation

- ▲ **Evaluation criteria changed after bids open**  
Post-submission changes undermine the integrity of the competition and may favor a particular bidder.
- ▲ **Winning bidder's qualifications unverifiable**  
Credential misrepresentation is common. Always cross-check CVs and company records independently.
- ▲ **Evaluator has undisclosed links to a bidder**  
Conflicts of interest must be declared. Recusal is the standard response; concealment is a red flag.

# Red Flags: Procurement

The following are illustrative examples only. Red flags are not definitive indicators of wrongdoing and should be assessed in context.



## Procurement

### 🚩 Bidding

### 🚩 Bid evaluation

### 🚩 Contract Award

## Contract Award

- ▲ **Scope expands significantly after award**  
May indicate the original bid was deliberately underpriced to win, with inflation planned for later.
- ▲ **Awarded firm on ADB Debarment Register**  
Automatic disqualifier. Debarment checks must be completed before award
- ▲ **Award overrides panel recommendation**  
Not automatically wrong, but must be clearly documented. Undocumented overrides are a red flag.

# Red Flags: Contract Administration

Understand how to spot, and how red flags may show up in your own work



## Contract & Asset Management



### Contract administration



### Output monitoring



### Asset control

## Contract administration

- ▲ **Repeated contract variations**  
Frequent or large variations without documented justification may indicate deliberate underpricing at bid stage.
- ▲ **Changes approved without oversight**  
Modifications to live contracts should go through the same rigor as the original award.
- ▲ **Debarred firm still seeking multiple variations**  
If a contractor becomes debarred during implementation, all contract modifications require OAI endorsement.

# Red Flags: Contract Administration

Understand how to spot, and how red flags may show up in your own work



## Contract & Asset Management

Contract administration

**Output Monitoring**

Asset control

## Output Monitoring

- ▲ **Deliverables reported complete; site says otherwise**  
Payment for undelivered work is one of the most common forms of project fraud. Independent site verification is essential.
- ▲ **Monitoring reports copy-pasted across periods**  
Verbatim repetition across reporting periods might suggest monitoring isn't actually happening.
- ▲ **Contractor blocks site access**  
Restricting monitoring access is itself a red flag and should be escalated.

# Red Flags: Contract Administration

Understand how to spot, and how red flags may show up in your own work



## Contract & Asset Management

🚩 **Contract administration**

🚩 **Output monitoring**

🚩 **Asset Control**

## Asset Control

- ▲ **Assets missing from inventory**  
Unaccounted-for project assets may indicate misappropriation. Regular physical checks are the primary control
- ▲ **Assets reassigned without authorization**  
Disposal or transfer of project assets should follow documented approval processes
- ▲ **No asset register maintained**  
Absence of an asset register makes accountability impossible and increases misappropriation risk.

# Red Flags: Financial Management

Understand how to spot, and how red flags may show up in your own work



## Financial Management



### Expenditure management



### Financial reporting

## Expenditure management

- ▲ **Payment requested before delivery**  
Advance payments without contractual basis or delivery confirmation are a common fraud vector. Verify delivery independently before approving.
- ▲ **Invoices from unverifiable firms**  
Firms with no physical address, employees, or track record may be shell entities created to siphon funds.
- ▲ **Payments split below approval thresholds**  
Deliberate structuring to stay under oversight limits is a red flag. Look for patterns of near-identical amounts.

# Red Flags: Financial Management

Understand how to spot, and how red flags may show up in your own work



## Financial Management

🚩 **Expenditure management**

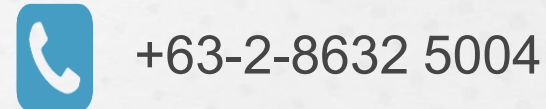
🚩 **Financial reporting**

## Financial reporting

- ▲ **Discrepancies between reports and field data**  
The gap between what is reported and what is observable on the ground is where misuse often hides
- ▲ **Audit findings repeated but unaddressed**  
Persistent unresolved audit findings may suggest either incapacity or deliberate non-compliance.
- ▲ **Project accounts commingled with other funds**  
Mixing project funds with other accounts makes tracking impossible and may indicate intentional obfuscation.

# Report Integrity Violations to ADB

Should you spot red flags, or something seems off, report them to ADB through the Office of Anticorruption and Integrity (OAI)



Report integrity violations:

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

# Consequences of Integrity Violations in ADB-Finance Projects



**Debarment** of firms or individuals



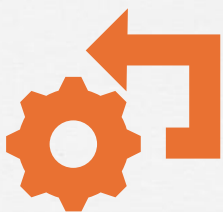
**Suspension** of the loan or grant allocations



**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

## INSTITUTIONS



# Impact While Under Debarment

Current contacts



MAY CONTINUE

Contract variations



REQUIRE OAI ENDORSEMENT

Future tenders



NOT PERMITTED

Reinstatement



NOT AUTOMATIC

# Strengthening a Culture of Integrity

## Section 4

# Small actions can help support Integrity



**Pause and question**  
when something feels  
unclear, rushed, or  
inconsistent



**Verify information,**  
even when it comes  
from trusted  
counterparts



**Declare conflicts**  
**early,** and step back  
when needed



**Document** decisions  
and approvals



**Speak up** and seek  
guidance



**Model integrity** in small  
things, because others  
take their cues from you

# Champion Anticorruption and Integrity

## Section 4



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.**

# 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



**Frequently Asked Questions on ADB Sanctions**

Scan the QR code to read



**Integrity Risks and Red Flags Series**

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



**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)

## 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**

# Thank you!



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



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ADB Anticorruption and Integrity



Report integrity violations :

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



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