



Office of Anticorruption and Integrity

Integrity Learning Series

ADB Anticorruption and Integrity Training

*Project 53118-004 GEO: Developing Resilient Infrastructure for Vibrant Economies (DRIVE)
Inception Mission*

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Office of Anticorruption and Integrity

13 June 2026

iACT with integrity!



Some Housekeeping Rules



Build relationships



Be optimistic we can make a better world



Share the stage



Session is being recorded



Participate



Raise confidential queries after the session



Be present and focused



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

The DRIVE Project

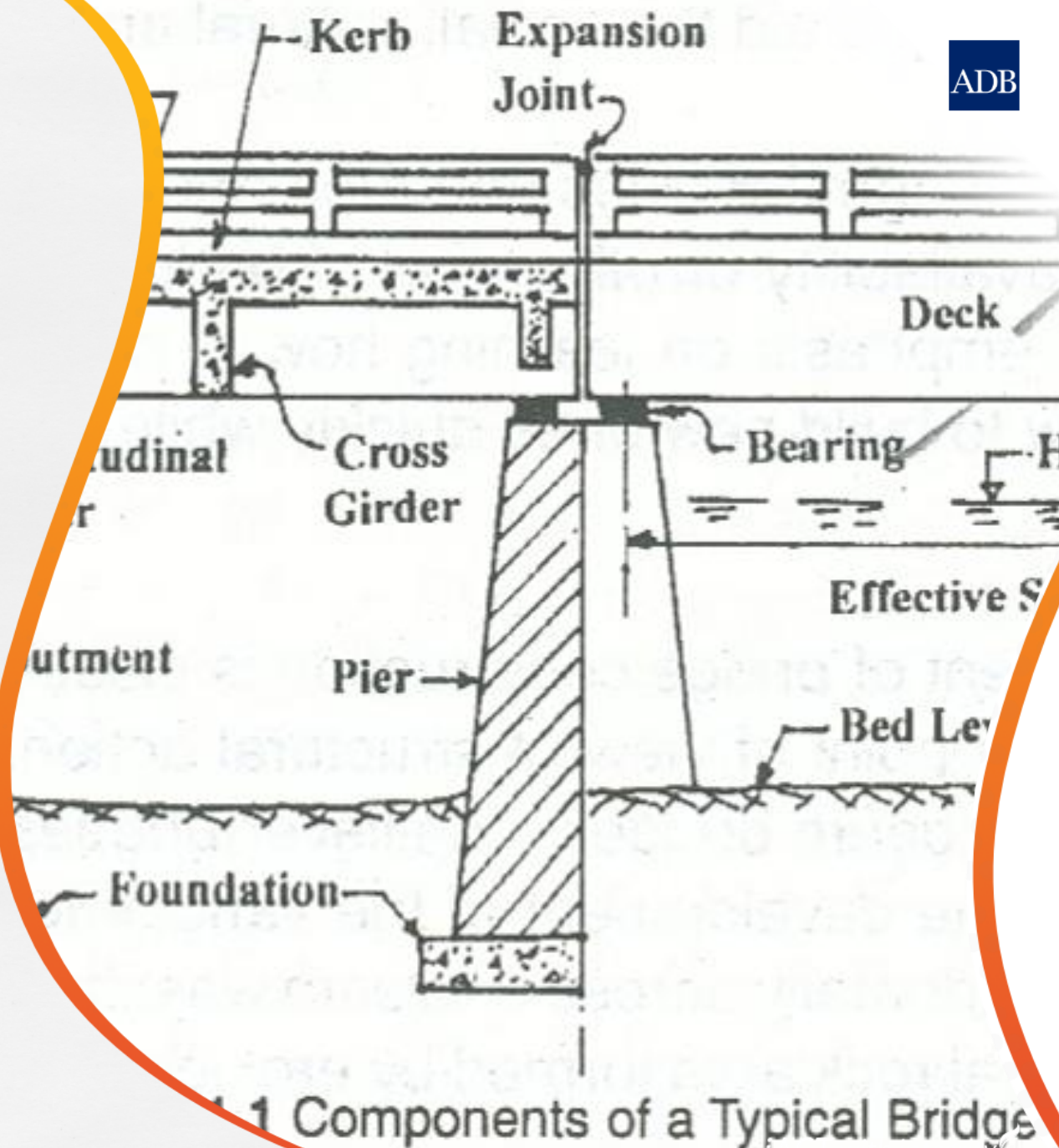
The project will finance the rehabilitation of cultural heritage assets (including heritage structures, surrounding streetscape, pedestrian paths, cultural trails) and urban upgrades for resilience (including green spaces, road rehabilitation, storm water drainage, engineering coastal protection, and multi-functional sport and recreation facilities) in high potential economic and tourism hot spots, including along the coastal areas of Georgia.



The DRIVE Project

In a project like this, these situations are normal:

- contractors need to be selected
- specifications need to be defined
- contracts will change during implementation
- works need to be verified on site
- payments depend on reported progress

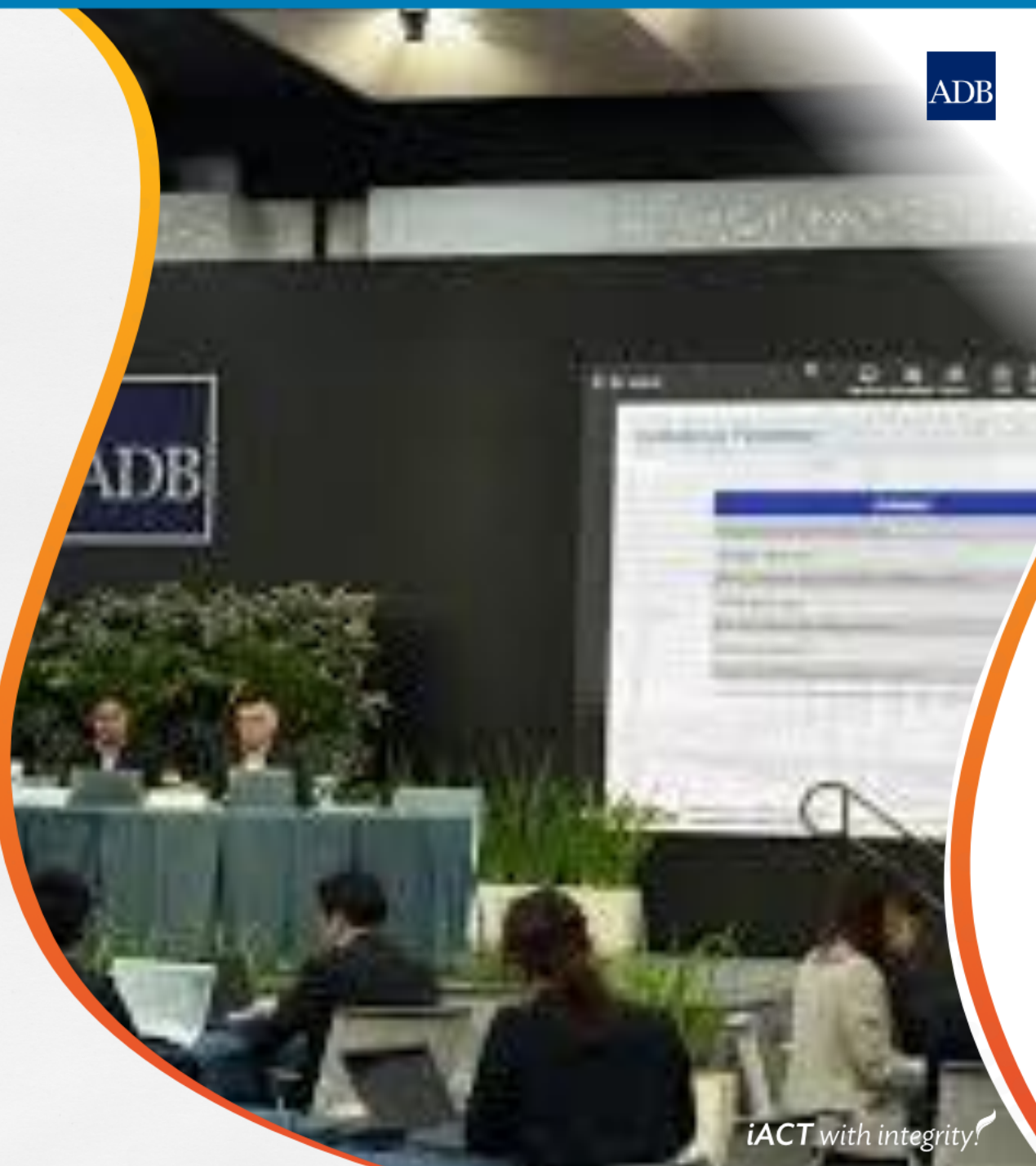


The DRIVE Project

In a project like this, these situations are normal:

- contractors need to be selected

▲ **Winning bidder's qualifications unverifiable**
Credential misrepresentation is common.
Always cross-check CVs and company records independently.



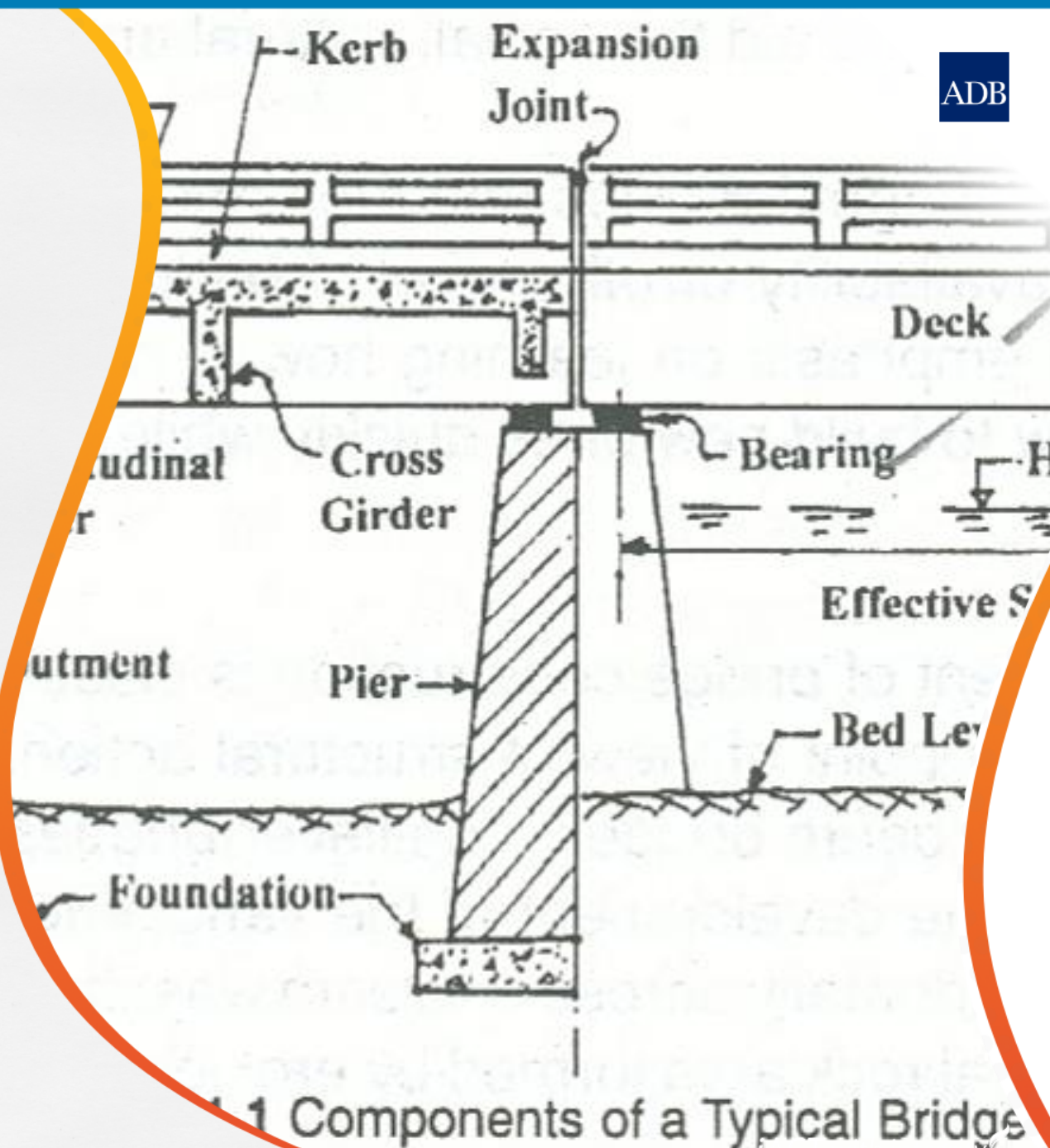
The DRIVE Project

In a project like this, these situations are normal:

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▲ Specifications too vague or too narrow

Overly broad specs increase discretion; overly narrow ones may be tailored to favor one firm.



The DRIVE Project

In a project like this, these situations are normal:

- contracts will change during implementation

▲ Repeated contract variations

Frequent or large variations without documented justification may indicate deliberate underpricing at bid stage.

CONTRACT MANAGEMENT

GUIDANCE NOTE ON PROCUREMENT

SEPTEMBER 2021

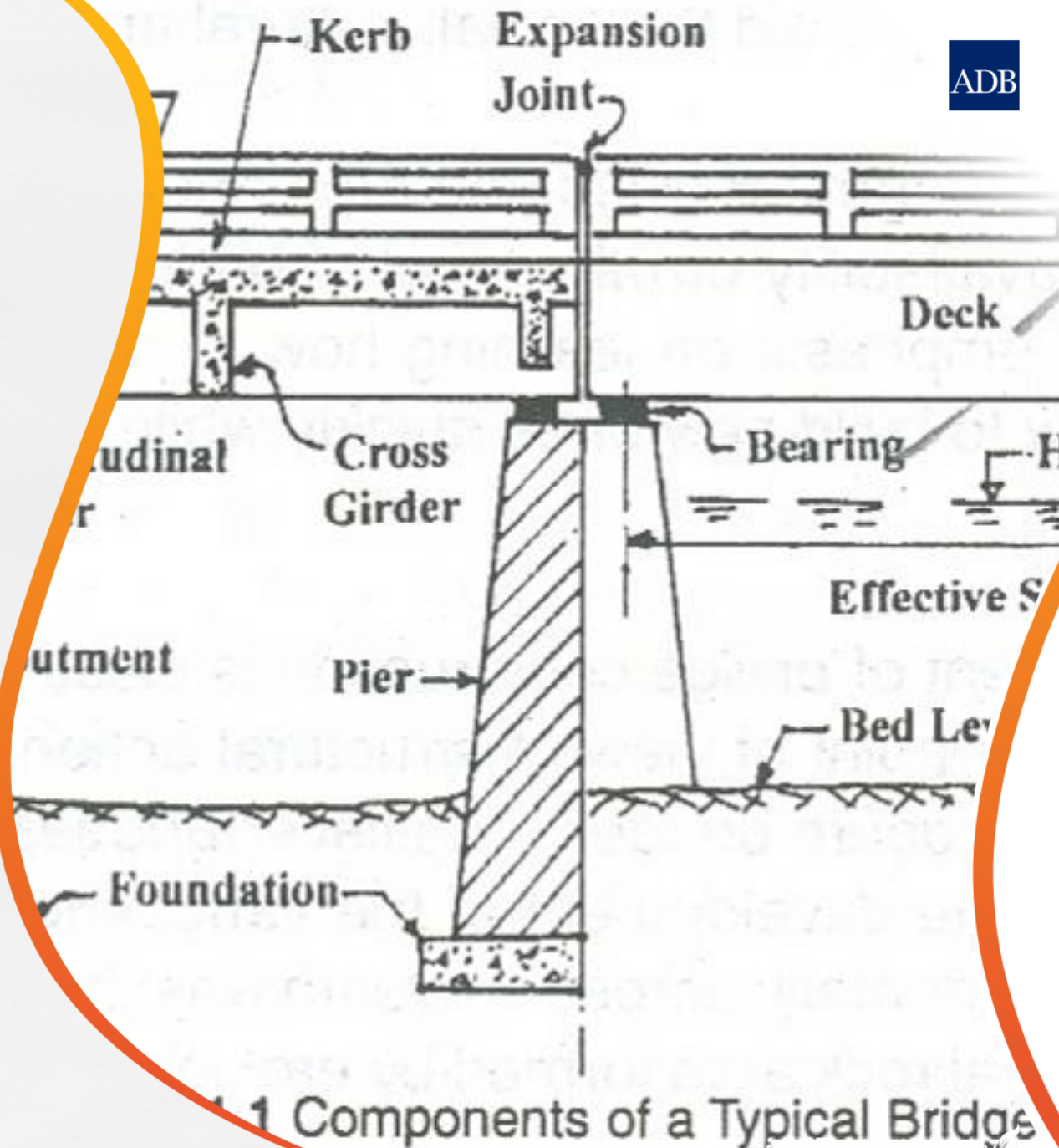
The DRIVE Project

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▲ **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.



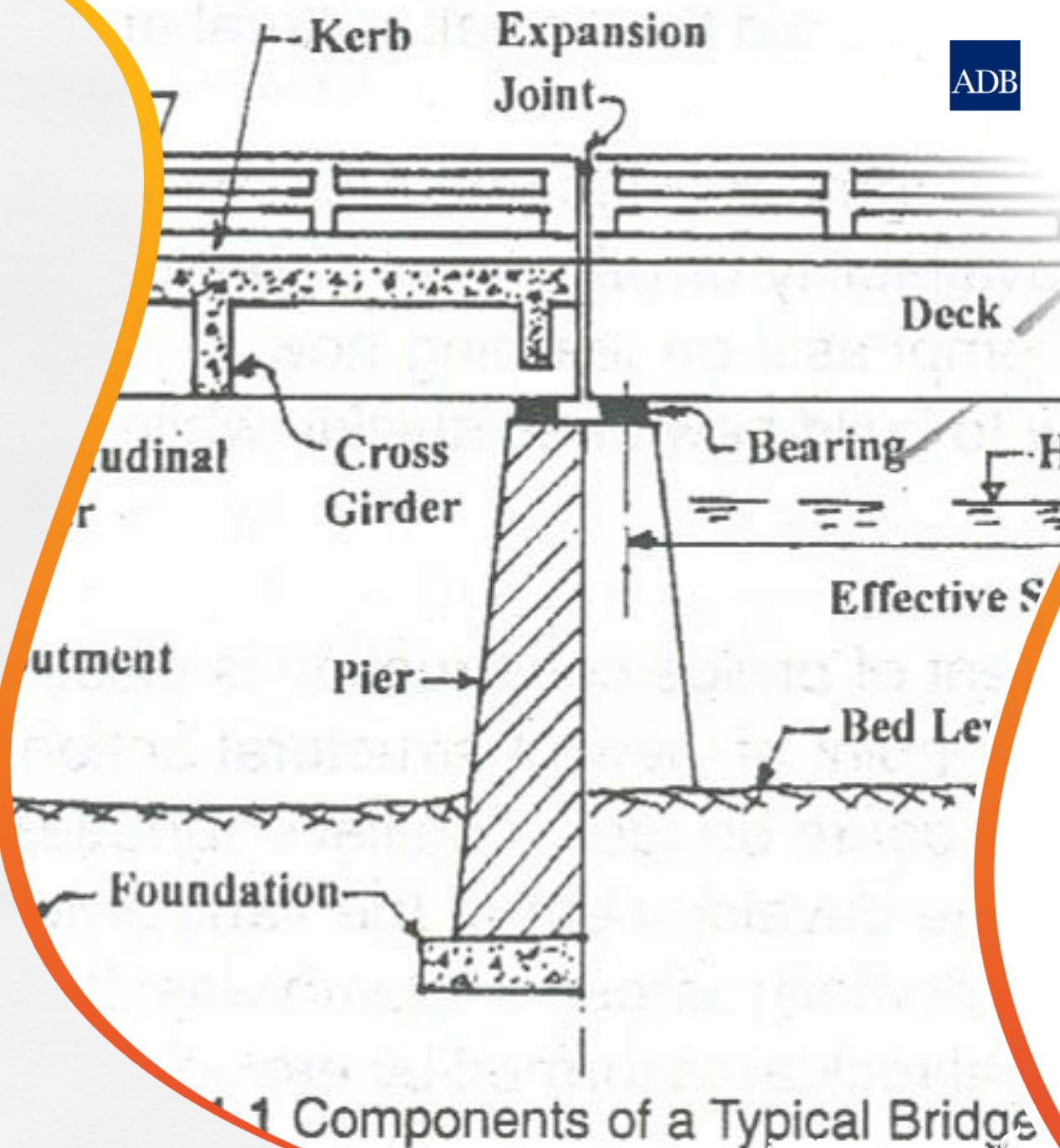
The DRIVE Project

In a project like this, these situations are normal:

- payments depend on reported progress

▲ **Payment requested before delivery**

Advance payments without contractual basis or delivery confirmation are a common fraud indicator. Verify delivery independently before approving.



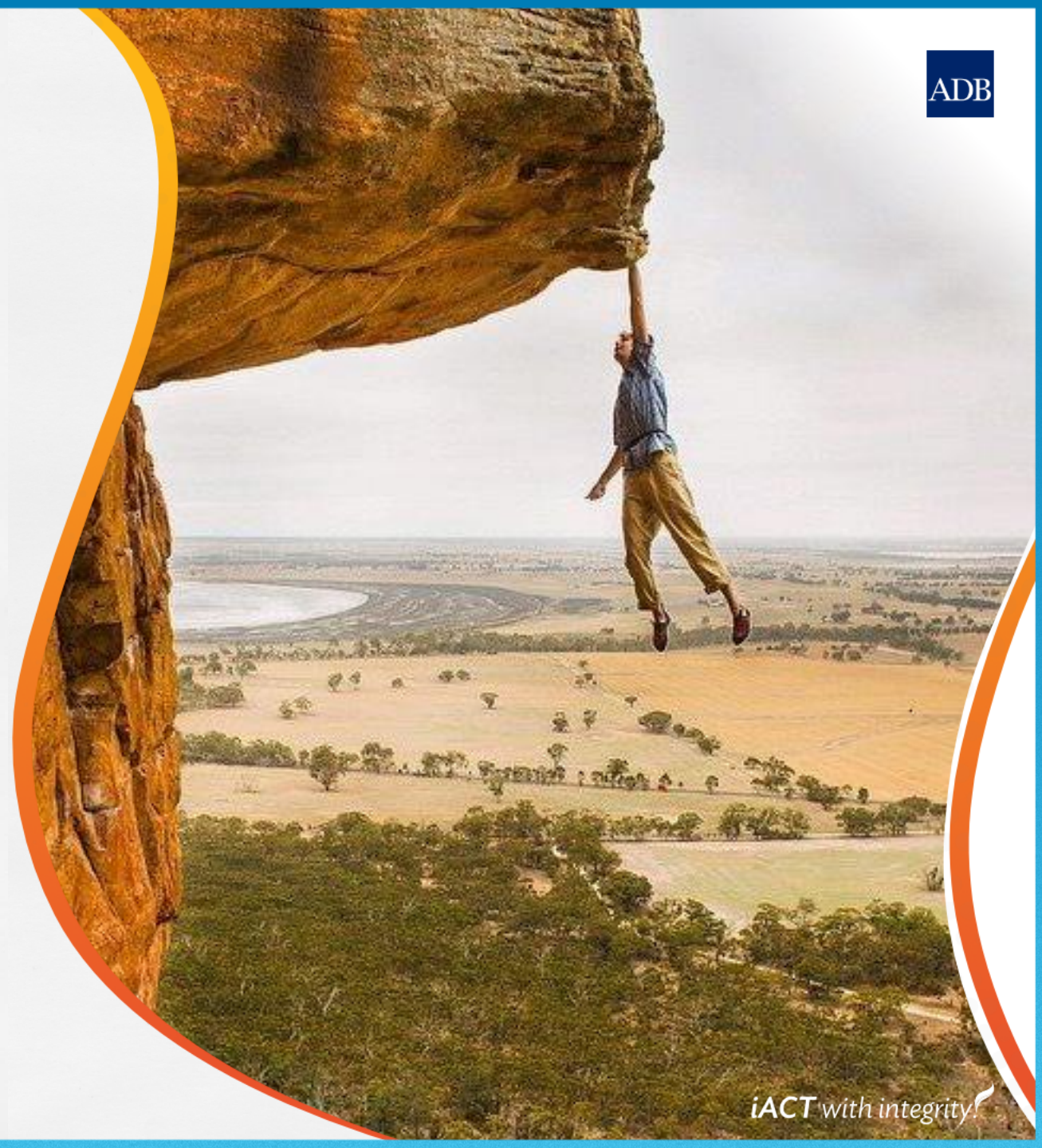
What do you see?

You are the closest to the process

ADB cannot see what happens on the ground all the time.

The Office of Anticorruption cannot see it.

But, YOU do.



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

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

How can you see problems more clearly?

Section 2

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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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

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

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.

Integrity Due Diligence in Practice

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



Identify
(Screen)

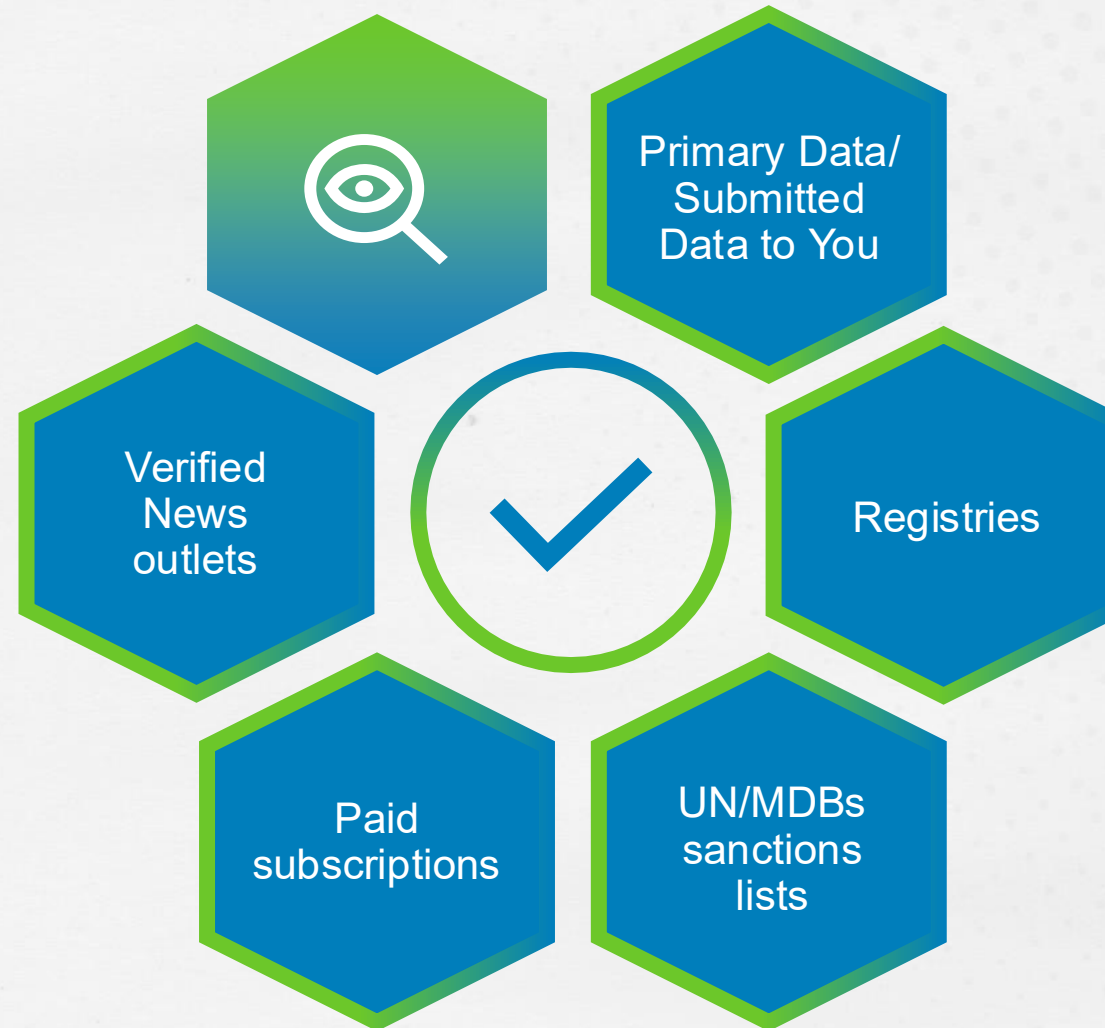


Assess



Monitor

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. It features a navigation bar with links to Home, ADB Debarment and Suspension Register, Resources, Other Sanctions Lists, and Contact Us. The main heading is "ADB Debarment and Suspension Register". Below it, 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). These entities are not eligible to participate in ADB-financed, -administered, or -supported activities.

Two main sections are highlighted with green boxes:

- NO LOGIN REQUIRED**: Publicly Disclosed Debarment or Suspension. A button labeled "View Publicly Disclosed Debarment or Suspension" is shown.
- AUTHORIZED USERS ONLY**: Complete ADB Debarment and Suspension Register. A button labeled "View Non-Publicly Disclosed Debarment" is shown.

Annotations on the left side of the screenshot:

- PUBLISHED LIST**: Accessible to the public (pointing to the "NO LOGIN REQUIRED" section).
- COMPLETE LIST**: Password-protected, accessible to:
 - ADB staff
 - BoD
 - Parties with a "need to know": international organizations, bilateral and government partners
 - EAs and IAs
 (pointing to the "AUTHORIZED USERS ONLY" section).

Below the highlighted sections, the page lists "What you will see in this subregister:" and "What you will see in the register:" with bulleted details. It also includes a section "How do I get access to this list?" with instructions for registered users, qualified users, and those with submission problems.

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



<http://sanctions.adb.org>

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](#)

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.

[Sign-Up Here](#)

[Manual Form Available](#)

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

Search Functionality

The screenshot shows the ADB Debarment and Suspension Register search page. A green box highlights the search bar and filter options. Below the search bar, a table of results is visible with columns: Entity Type, Name, Address, Sanction Type, Other Name / Logo, Nationality, Effect Date / Lapse Date, Grounds, and Changes Made on.

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

Search names using the search bar

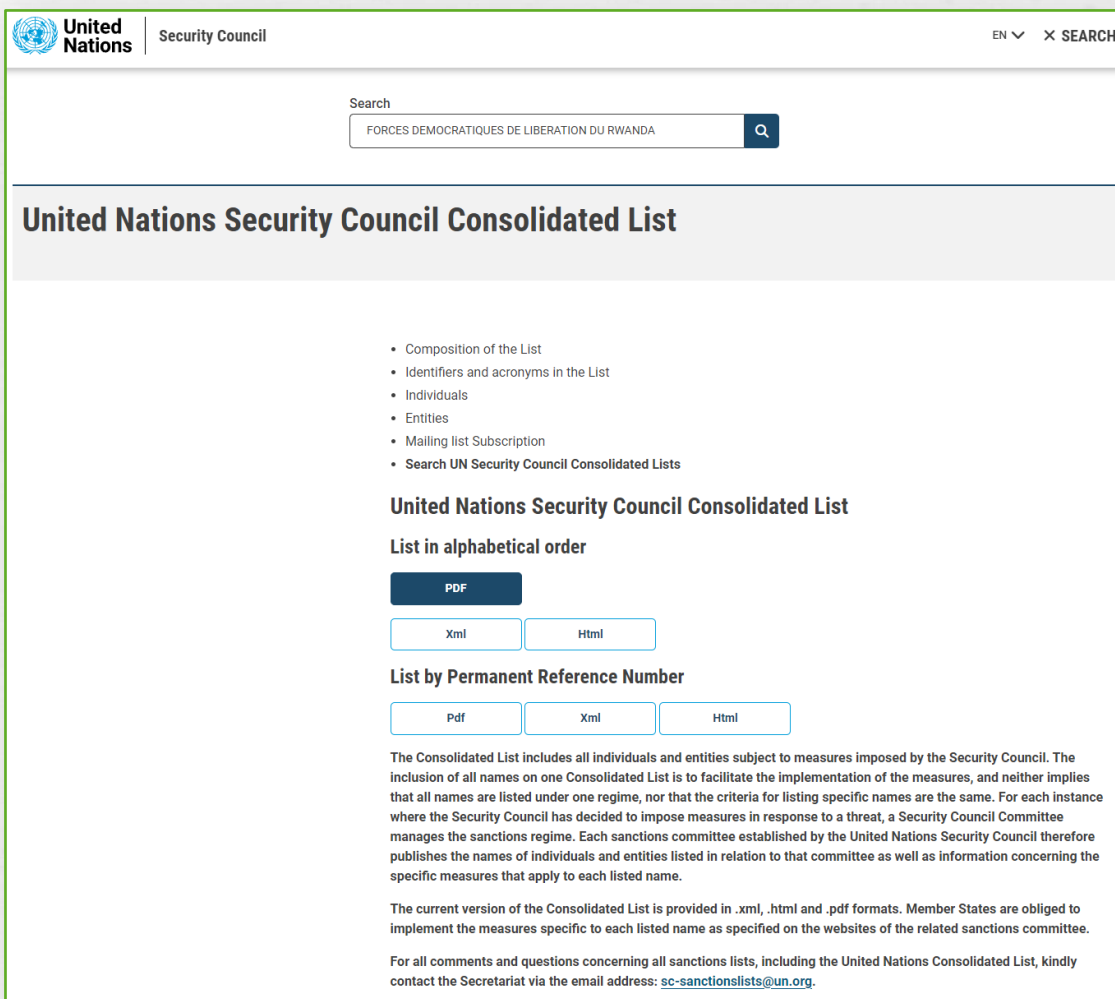
TO NOTE

- Avoid including common terms when searching. "Ltd", "Company", "LLC"
- Remove leading terms such as "M/S, or M/S." from company names

Example: Use "A2Z" when searching for A2Z Waste Management

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.

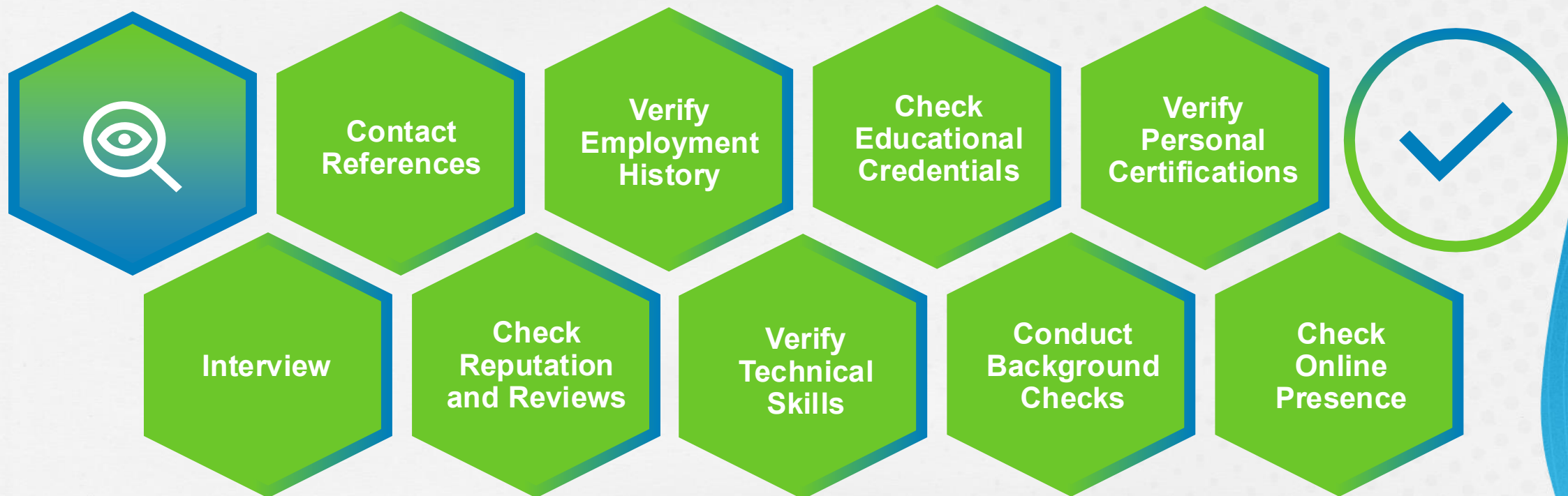
For all comments and questions concerning all sanctions lists, including the United Nations Consolidated List, kindly contact the Secretariat via the email address: sc-sanctionslists@un.org.



<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 .

What do you do when you see a problem?

Section 3

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 to OAI



anticorruption@adb.org
integrity@adb.org



+63-2-8632 5004



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



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



@anticorruptionandintegrity



integrity@adb.org



@adb_oai



+63-2-8632 5004



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.