



Office of Anticorruption and Integrity

The Integrity Learning Series

Anticorruption and Integrity Training

India

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21 May 2026
Online Session

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

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 (2025)

INDIA

Score

39/100

Rank

91/182

Score change

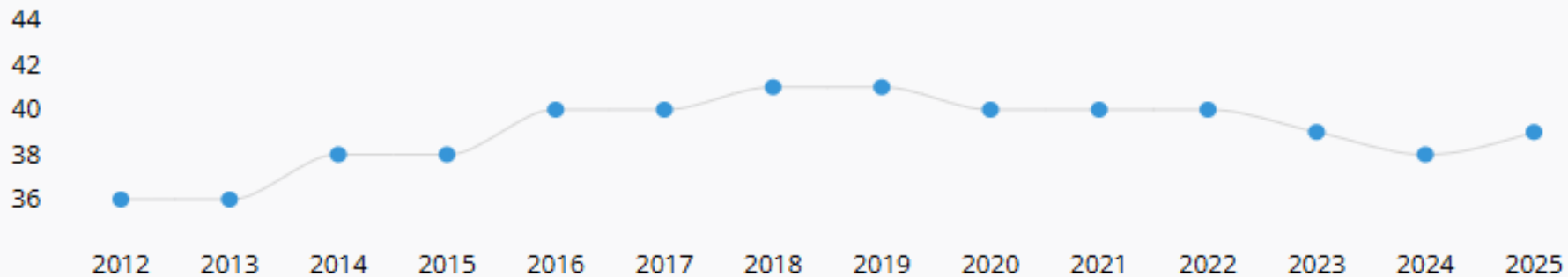


+1 Since 2024



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

Score changes 2012 - 2025



Corruption Sentiments (2025)



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



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

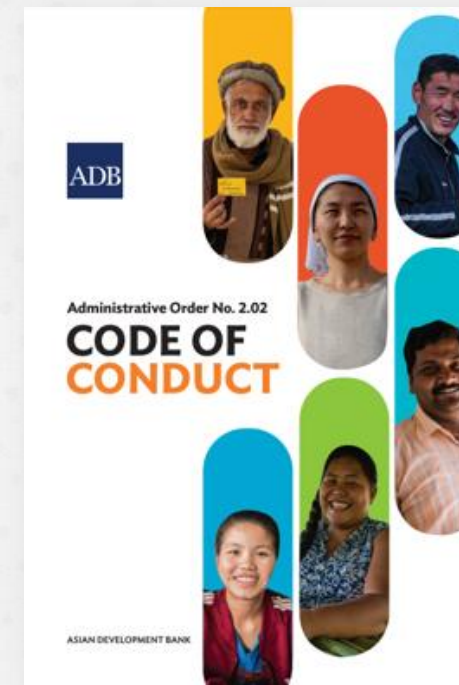
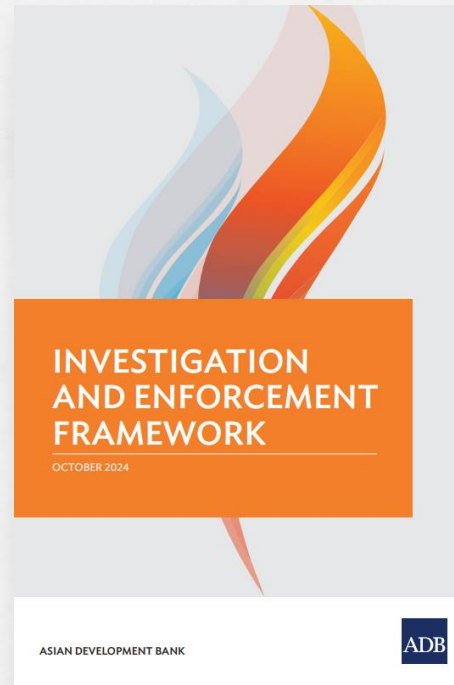


Ensuring that ADB projects and staff adhere to the highest ethical standards



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

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.

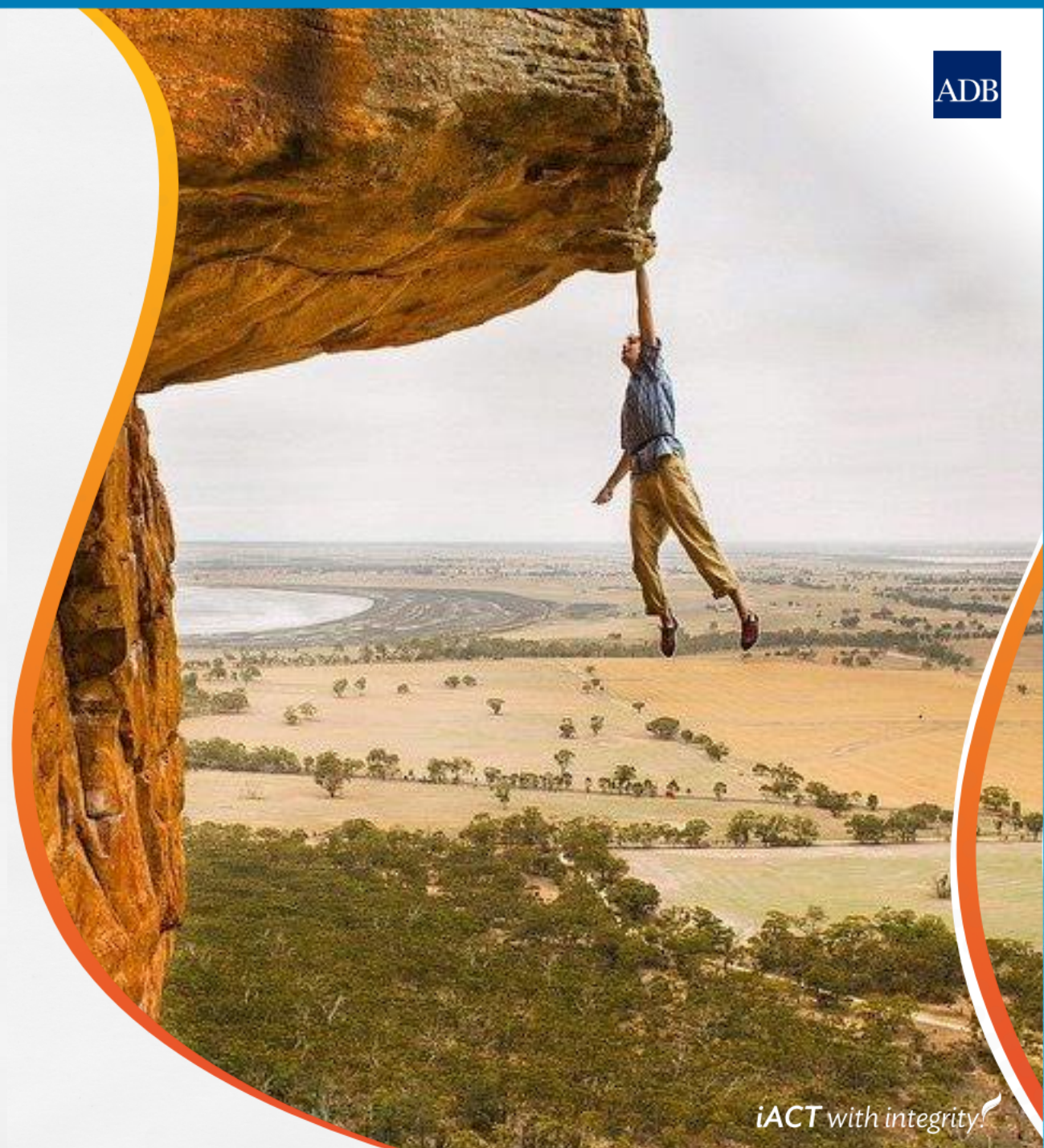


Reputational Risk and Integrity Risk

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



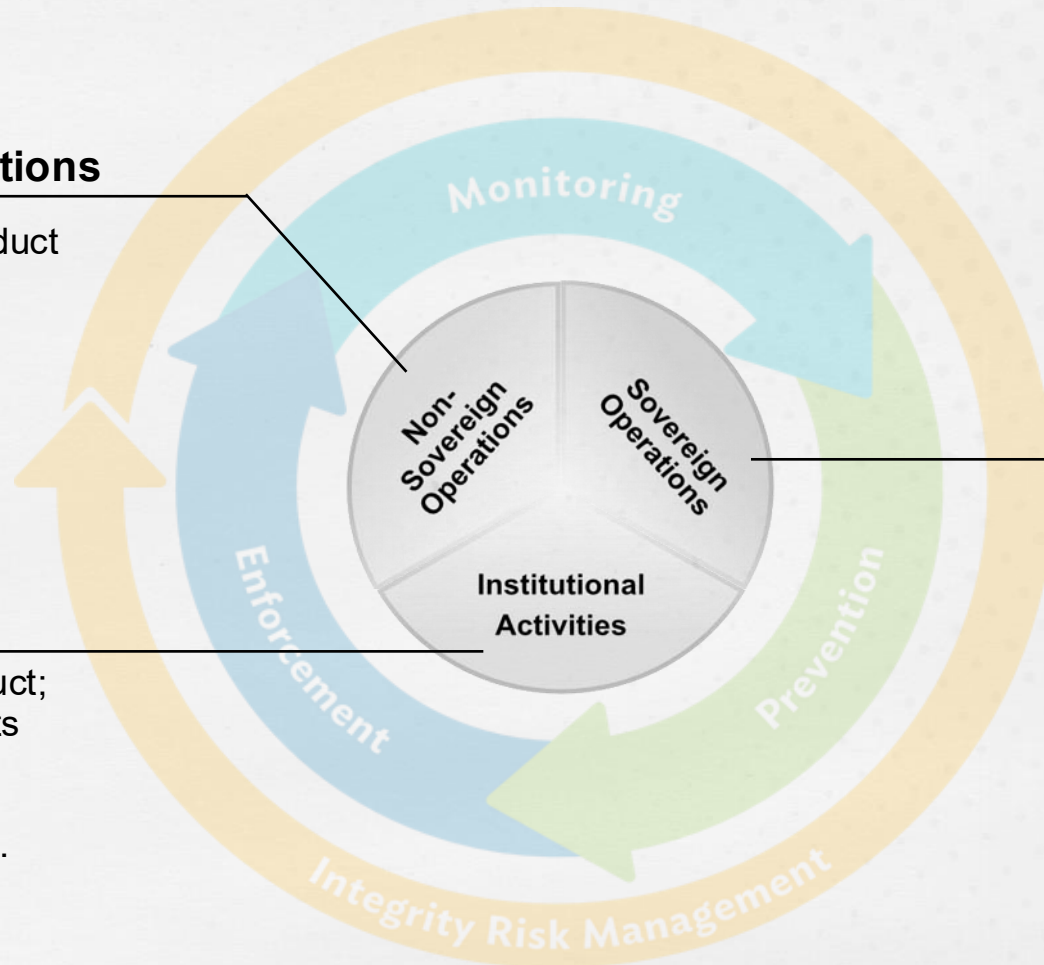
ADB's Exposure to Integrity Risk

ADB Non-Sovereign Operations

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

ADB Institutional Activities

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



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

Zero tolerance does not mean zero occurrence



III. Integrity Violations

Integrity Violations

MDB-Harmonized Definitions



Fraud



Corruption



Collusion



Coercion



Failure to disclose
and manage a
conflict of interest



Abuse



Obstruction



Retaliation Against
Whistleblowers
or Witnesses



**Violation of
Debarment**



Failure to Adhere to
the Highest Ethical
Standards

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



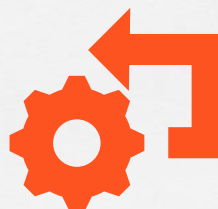
Suspension of the loan or grant allocations



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

 <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.

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:

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- 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 ▾

Debarment

Contract

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



**MAY
CONTINUE**

Contract
variations



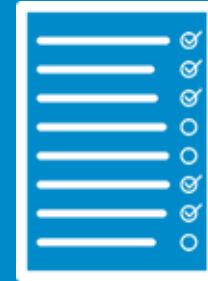
**OAI
APPROVAL**

Reinstatement



NOT AUTOMATIC

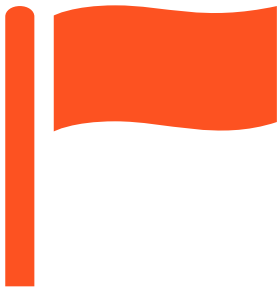
Future
tenders



NOT PERMITTED

V. Recognizing and Reducing Risk

- **Red Flags**
- Due Diligence



Be alert to the
red flags of
integrity risks.

Project Implementation Processes

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

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. 

Red Flags in Bid Evaluation

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

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... ⚠

Fake CVs or credentials



V. Recognizing and Reducing Risk

- Red Flags

- **Due Diligence**



WHY?



WHO?



WHEN?



WHAT?

Factors in Conducting Due Diligence



Beneficial ownership



Financial background
and payment of contract



Competency of third party



Public records resources:
History of corruption
and adverse news

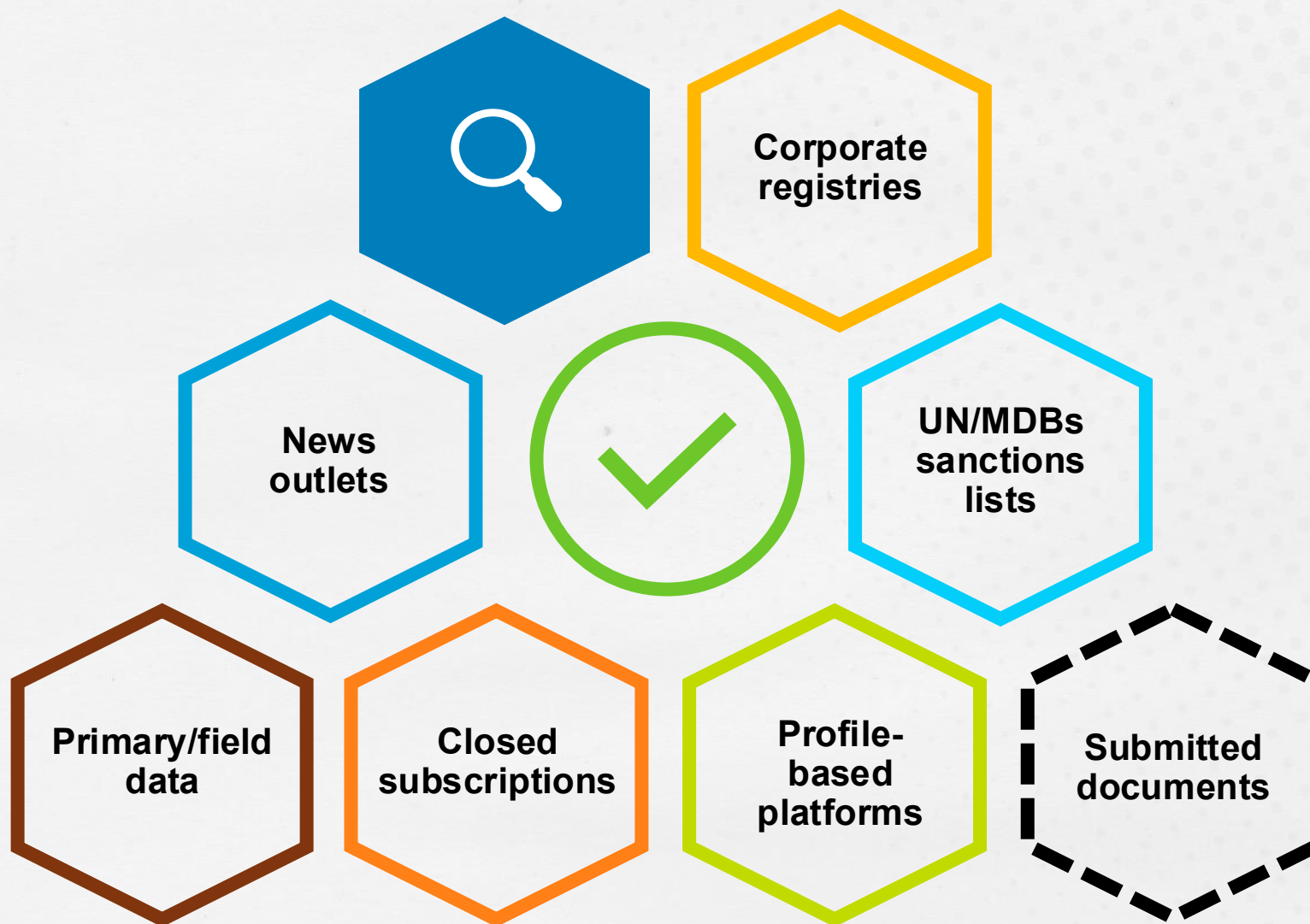


Reputation:
Commercial references

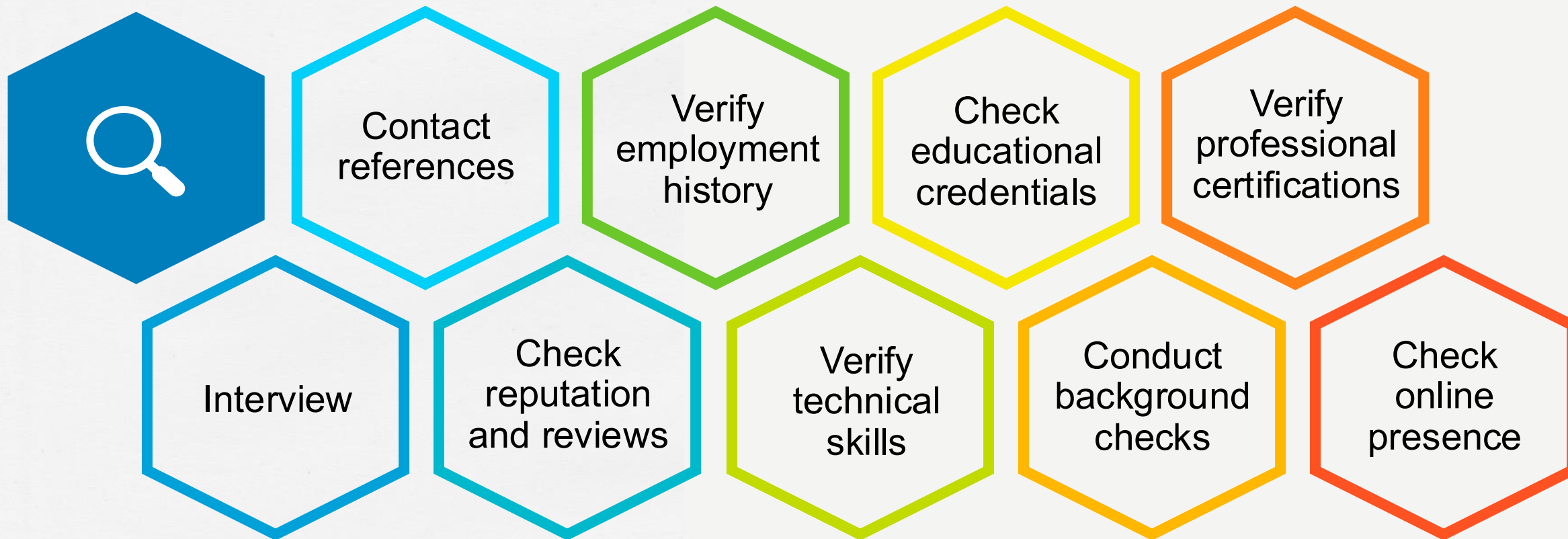


Approach to ethics
and compliance

Conduct Due Diligence: Sources



Conduct Due Diligence: Verification



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



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.

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Access to the Debarment Register

Goods and Works



Consulting Services



Executing & Implementing Agencies are Responsible for Sanctions Screening.

Conducting Due Diligence: Debarment Checks

Ensure that EAs/IAs have signed-up!

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



 <https://sanctions.adb.org/>

ADB Debarment and Suspension Register

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NO LOGIN REQUIRED

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Other Information

Application 

Temporary Suspension 

Debarment Period 

Contract Variations 

Sign-up here

Manual form available

Conducting Due Diligence: Debarment Checks

ADB ASIAN DEVELOPMENT BANK

Home ADB Debarment and Suspension Register Resources Other Sanctions Lists Contact Us

Login Sign Up

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.

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.

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



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



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ADB Anticorruption and Integrity



Report integrity violations :

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



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