



Office of Anticorruption and Integrity

The Integrity Learning Series

# Lao PDR: Anticorruption and Integrity Training

**Marc Ayes**  
Senior Integrity Officer

13 March 2025  
Hybrid Session

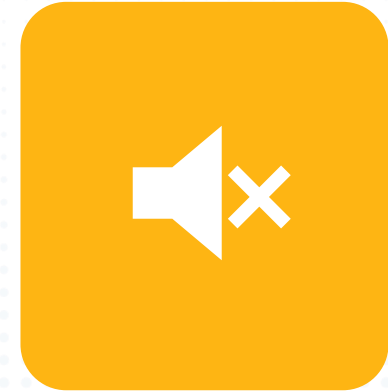
# Reminders



The session is being  
recorded.



Type in your  
questions through  
Q&A at any time.



Please remain on  
mute if not speaking.

# What to expect

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- I. ADB's Anticorruption and Integrity Framework
  - II. Recognizing and Reducing Risk
    - a. Due Diligence
    - b. Red Flags
  - III. Integrity Violations and Debarments
  - IV. Reporting an Integrity Violation
-



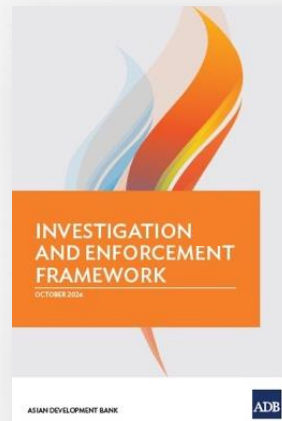
You find a wallet on the street. It has the owner's ID and \$1,000.

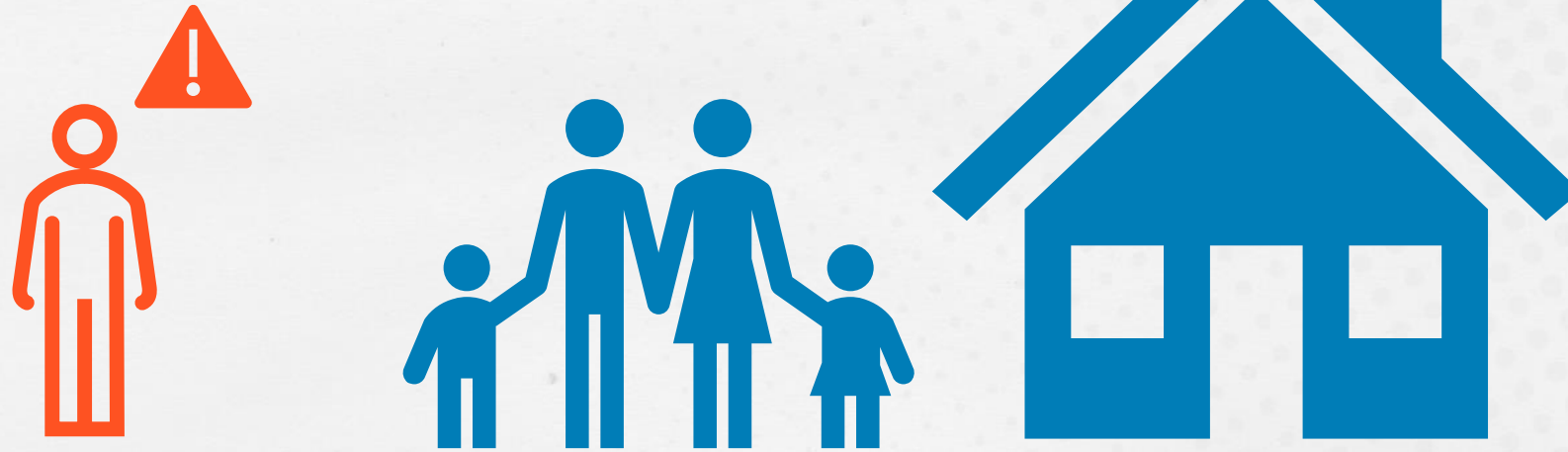
What would **you** do?



# ADB's Anticorruption & Integrity Framework

Applies to **executing** and **implementing agencies**, **contractors**, **consultants**, **suppliers**, **ADB staff**, and **anyone connected** to an ADB-financed, -administered, or -supported activity.





?

## Who do you invite to your house?



## II. Recognizing and Reducing Risk

- **Due Diligence**
- Red Flags

# Due Diligence



Examine



Assess



Decide



# 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

## II. Recognizing and Reducing Risk

- Due Diligence
- **Red Flags**

# Recognizing Risk: Red Flags in the Project Cycle

## 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



# Recognizing Risk: Red Flags in the Project Cycle

## Goods and Works

Technical  
BER

Financial  
BER



## Consulting Services

Technical  
Proposals

Financial  
Proposals



Bidding

Bid Evaluation

### Bid Submission Sheet

#### NOTES

1. The bidder must accomplish the Bid and address.
2. To be used for Single-Stage: One-En

### Letter of Bid

#### NOTE

The bidder must accomplish the Letter of Bid on its letterhead clearly showing the bidder's complete name and address.

Date: .....

ICB No.: .....

Invitation for Bid No.: .....

To: .... [insert complete name of the employer] .....

We, the undersigned, declare that:

(s) We have examined and have no reservations to the Bidding Documents, including Addenda issued in

# Recognizing Risk: Red Flags in the Project Cycle

## Goods and Works

Technical  
BER

Financial  
BER



## Consulting Services

Technical  
Proposals

Financial  
Proposals



Bidding

Bid Evaluation

**BEC members should also ensure that they have no conflict with participating firms.**

**Information on incorporation documents, shareholders, owners and managers, authorized representative, JV partners, legal address and country of constitution should be in order**

# Recognizing Risk: Red Flags in the Project Cycle

## Goods and Works

Technical  
BER

Financial  
BER



## Consulting Services

Technical  
Proposals

Financial  
Proposals



### Bid Evaluation

- ❏ A bid submission included bidder's experience which looks unreasonably large in comparison to the nature of works and contracted period.
- ❏ It appears that one digit was added to the contracted price in the supporting documents.
- ❏ Notes were attached in a local language. In the photocopy of the supporting document submitted as part of the bid, the numbering was not aligned in a straight line.



# Recognizing Risk: Red Flags in the Project Cycle

## Goods and Works

Technical  
BER

Financial  
BER



## Consulting Services

Technical  
Proposals

Financial  
Proposals



### Bid Evaluation

#### Form PER - 1: Proposed Personnel

Bidders should provide the names of suitably qualified personnel to meet the specified requirements for each of the positions listed in Section 3 (Evaluation and Qualification Criteria). The data on the experience should be supplied using the Form below for each candidate.

1.	Title of position	TEAM LEADER (ELECTRICAL ENGINEER)
	Name	[REDACTED]

- A bid submission included bidder's experience – **Team Leader , Electrical Engineer**

# Recognizing Risk: Red Flags in the Project Cycle

## Goods and Works

Technical  
BER

Financial  
BER



## Consulting Services

Technical  
Proposals

Financial  
Proposals



### Bid Evaluation

#### CERTIFICATE

Certified that

Sri/Sun



a student of

the Thangal Kunju College of Engineering, Kollam has attended all the courses

prescribed by the University of Kerala for the B. Tech./ B. Arch./ M. Tech./ M. C. C./ M. B. A. degree

Civil Engineering

Branch during the year 1995..... to 1997.....

His/Her conduct and character were found to be

Good

# Recognizing Risk: Red Flags in the Project Cycle

## Goods and Works

Technical  
BER

Financial  
BER



## Consulting Services

Technical  
Proposals

Financial  
Proposals



### Bid Evaluation

- ❏ The submitted bid included a set of photocopied bidder's invoices as supporting their experience. No official receipt, certification of works completion, or other documents issued by the client were submitted.
- ❏ In several bids over procurement of several packages, 70%-80% of unit price items in the bill of quantities were identical i.e., exactly the same unit price



# Recognizing Risk: Red Flags in the Project Cycle

## Goods and Works

Contract Award

Withdrawal Applications



## Consulting Services





Contract Award

Withdrawal Applications



### Contract Award

**Insufficient on-site monitoring and supervision of contracts, poor quality of works, services and goods**

-  Deviation from construction design or Terms of Reference
-  Submission of irregular interim and final performance certificates
-  Submission of irregular contract variations (exaggerated contract amount, scope of contract)
-  Manipulation of Bill of Quantities

# Recognizing Risk: Red Flags in the Project Cycle

## Goods and Works

Contract Award

Withdrawal Applications



## Consulting Services

Contract Award

Withdrawal Applications



### Contract Award

Manipulation

ACCOUNT		HOW PAID	
AMOUNT OF ACCOUNT		CASH	<input checked="" type="checkbox"/>
AMOUNT PAID	800 ✓	CHECK / C.C.	
BALANCE DUE		MONEY ORDER	

OFFICIAL RECEIPT DATE 11/5/14 NO. 9408  
 RECEIVED FROM [REDACTED]  
 ADDRESS: Eight Hundred 300/100 DOLLARS \$ 800.00  
 FOR Rent payment for November 2014  
 BY [Signature] Thank You!

ACCOUNT		HOW PAID	
AMOUNT OF ACCOUNT		CASH	<input checked="" type="checkbox"/>
AMOUNT PAID	800 ✓	CHECK / C.C.	
BALANCE DUE		MONEY ORDER	

OFFICIAL RECEIPT DATE 12/5/14 NO. 9410  
 RECEIVED FROM [REDACTED]  
 ADDRESS: Eight Hundred 300/100 DOLLARS \$ 800.00  
 FOR Rent payment for December 2014  
 BY [Signature] Thank You!

# III. Integrity Violations and Debarments

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- Integrity Violations
- Remedial Actions
- Case Study
- Impact While Under Debarment





# Zero Tolerance $\neq$ Zero Occurrence

# 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



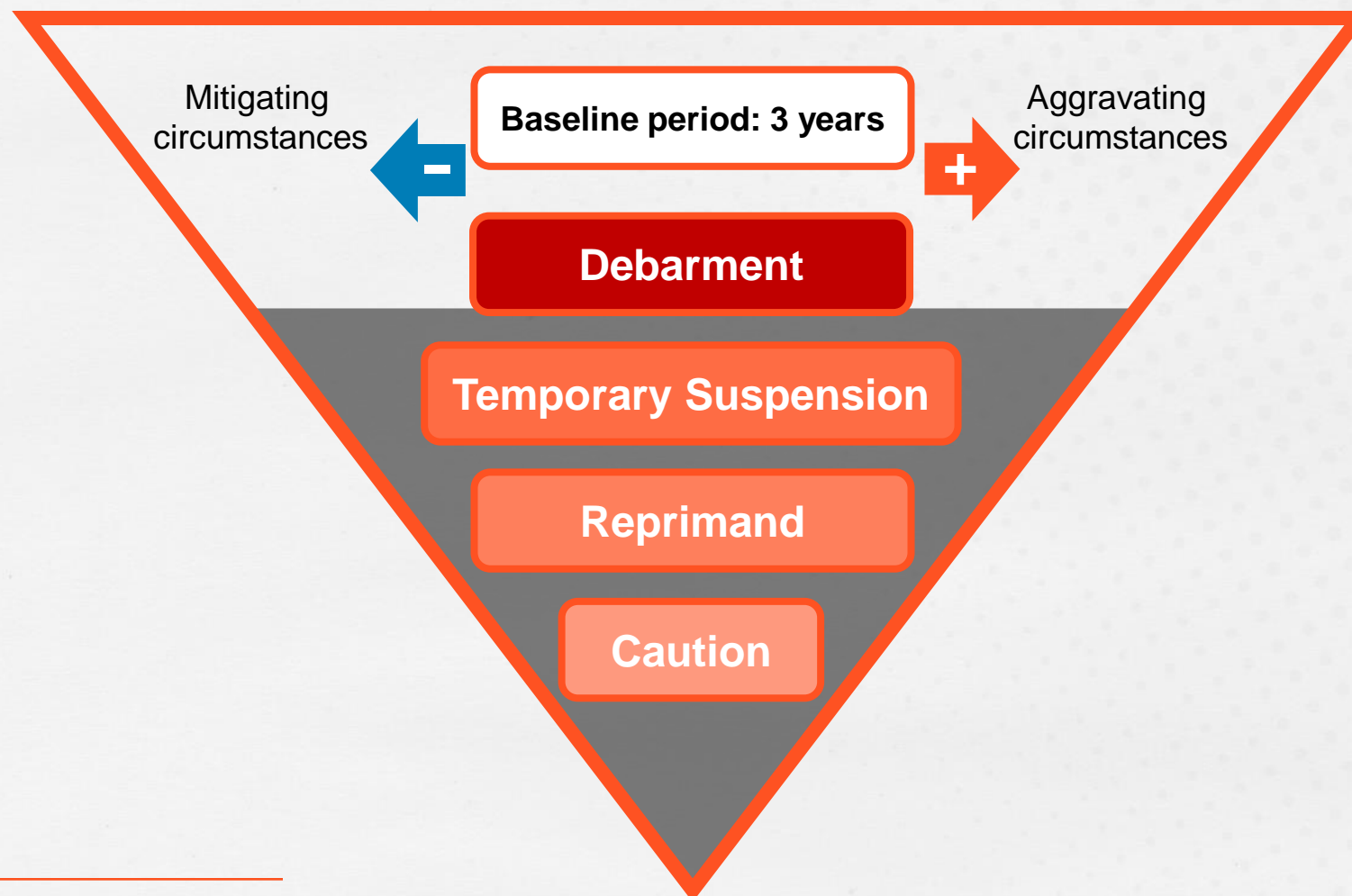
**Violation of  
Debarment**



Failure to Adhere to  
the Highest Ethical  
Standards



What are the **remedial actions** that ADB may impose on a party in relation to an investigation?





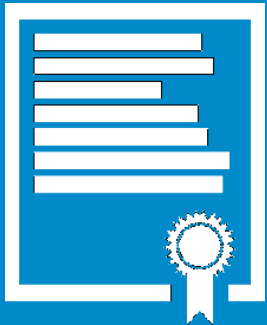
# Case Study

- “Ms.Thip”, a national of Laos, was debarred by the WBG for 43 months due to fraudulent practices related a project in Laos.
- Ms.Thip submitted a falsified consulting contract to negotiate an inflated salary and simultaneously claimed payments from both the Project and another project financed by ADB.
- As part of a settlement agreement, Ms.Thip did not contest culpability and agreed to meet specific compliance conditions for release from debarment.
- The debarment qualified for cross-debarment by other multilateral development banks under the Agreement for Mutual Enforcement of Debarment Decisions.



# Impact While Under Debarment

Current  
contracts



**MAY  
CONTINUE**

Contract  
variations



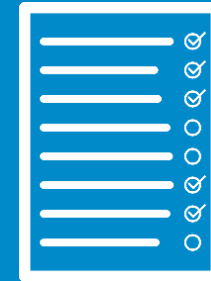
**OAI  
APPROVAL**

Reinstatement



**NOT AUTOMATIC**

Future  
tenders



**NOT PERMITTED**

# III. Reporting an Integrity Violation

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- Debarment and Suspension Checks
- ADB Debarment and Suspension Register
- How do you report a suspected Integrity Violation?
- Research Sources



# How can WE combat corruption?

- ✓ Promote **Zero** Tolerance
- ✓ Be alert to the **red flags** of integrity risks.
- ✓ **Report** suspicious activity



# Debarment and Suspension Checks

 <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:

- 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](mailto: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

# Sign up: ADB Debarment and Suspension Register

**ADB** ASIAN DEVELOPMENT BANK

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

 <http://sanctions.adb.org>

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Other Information

- Application ▾
- Temporary Suspension ▾
- Debarment Period ▾
- Contract Variations ▾

Sign-up here

Manual form available



# Sign up: ADB Debarment and Suspension Register

ADB

Login Sign Up



ASIAN DEVELOPMENT BANK

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

## Application Form

ADB Project Officer's contact information:

Project Officer\*

Project Officer's ADB Email\*

Information on why access is required

Make sure you fill in the name and email address of an ADB project officer who can verify your involvement in the project

# Navigating: ADB Debarment and Suspension Register



ASIAN DEVELOPMENT BANK

[Home](#) [ADB Debarment and Suspension Register ▾](#) [Resources ▾](#) [Other Sanctions Lists ▾](#) [Contact Us](#)

## Complete ADB Debarment and Suspension Register

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 ↕


# Navigating: ADB Debarment and Suspension Register



 **ASIAN DEVELOPMENT BANK**

[Home](#) [ADB Debarment and Suspension Register ▾](#) [Resources ▾](#) [Other Sanctions Lists ▾](#) [Contact Us](#)

## Complete ADB Debarment and Suspension Register

Search 







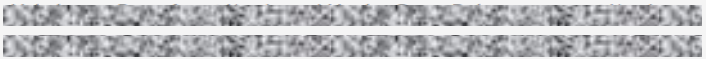


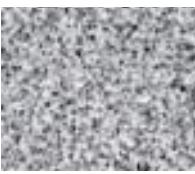








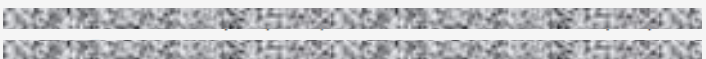
Entity Type ▾

Sanction Type ▾

Nationality ▾

Cross-Debarred ▾

Search Results



## ADB



# Search: ADB Debarment and Suspension Register

## Complete ADB Debarment and Suspension Register

Search  Entity Type  Sanction Type  Nationality  Cross-Debarred

Entity Type	Name ↑	Address ↕	Sanction Type	Other Name / Logo	Nationality	Effect Lapse



Search names using the search bar



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

# Conducting Due Diligence



Beneficial ownership



Financial background  
and payment of contract



Competency of third party



Public records resources:  
History of corruption  
and adverse news



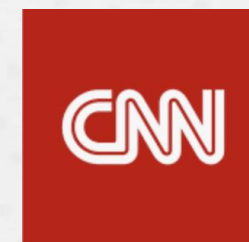
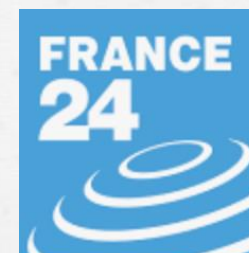
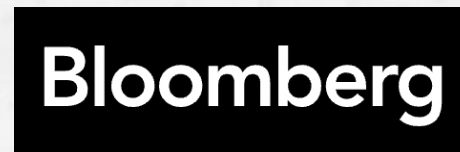
Reputation:  
Commercial references



Approach to ethics  
and compliance



# Research Sources



# 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 Sanctions List and
- ii. Do the sanctions checks



**Report integrity violations to OAI**



?

## Who do you invite to your house?



# How do you report a suspected Integrity Violation?

The screenshot shows the ADB website's 'Report Integrity Violations' page. At the top, the ADB logo and 'ASIAN DEVELOPMENT BANK' are on the left, and navigation links for 'News and Events', 'ADB Institute', 'Contact', and 'English' are on the right. Below this is a secondary navigation bar with 'WHO WE ARE' (highlighted in blue), 'WHAT WE DO', 'WHERE WE WORK', and 'WORK WITH US'. A search bar is also present. The main navigation bar includes 'Home', 'Report Integrity Violations' (highlighted), 'Our Work', 'Advisories and Sanctions', 'Activities', and 'Cross Debarment'. The breadcrumb trail reads: 'Home > Who We Are > Anticorruption and Integrity > Anticorruption and Integrity: Report Inte...'. The main heading is 'Report Integrity Violations', followed by a blue button 'Submit an Online Complaint'. Below this is a list of links with right-pointing chevrons: 'What can I report to OAI?', 'What concerns are outside OAI's mandate?', 'How do I report a complaint?', 'What are my rights and responsibilities as a complainant?', 'What happens to my complaint?', 'Whistleblower and Witness Protection', and 'Code of Conduct'. On the right side, there is a 'Related' section with links to 'Anticorruption Policy', 'Investigation and Enforcement Framework', 'Anticorruption Policy: Enhancing the Role of the Asian Development Bank in Relation to Tax Integrity (Policy Paper)', 'Online Course: Anticorruption and Integrity at ADB', and 'ADB-OECD Anti-corruption Initiative for Asia Pacific'. Below this is an orange warning box with a triangle icon and the text 'Warning: Beware of scams using ADB's name'. At the bottom right is a blue button 'ADB Debarment and Suspension Register'.

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

# Integrity Risk Management is Everyone's Responsibility



# Other Resources





# Questions?

## 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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[integrity@adb.org](mailto:integrity@adb.org)



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ADB Anticorruption and Integrity



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



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