

The Integrity Learning Series

Lao PDR: Anticorruption and Integrity Training

Marc Ayes

Senior Integrity Officer

13 March 2025
Hybrid Session

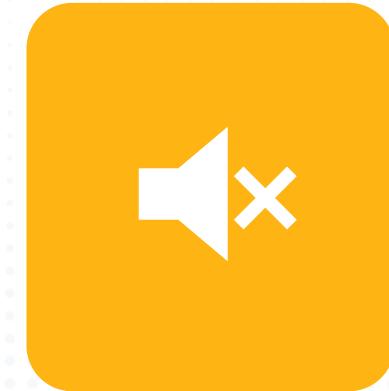
Reminders



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

- 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



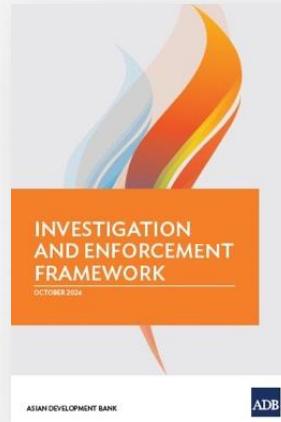
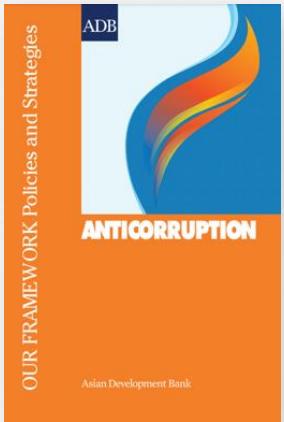
You find a wallet on the street. It has the owner's ID and \$1,000.

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

ADB



Examine



Assess



Decide

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

II. Recognizing and Reducing Risk

- Due Diligence
- **Red Flags**



Recognizing Risk: Red Flags in the Project Cycle

Goods and Works



Consulting Services



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-Envelope

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:

(a) 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
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Financial
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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
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Financial
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Consulting Services

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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
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Financial
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Consulting Services

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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	

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

Recognizing Risk: Red Flags in the Project Cycle

Goods and Works

Technical
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Financial
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Bid Evaluation

CERTIFICATE

Certified that

Sri/Su/



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

presented 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

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Consulting Services

Technical
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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 qualities 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

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

Manipulation

Contract Award

OFFICIAL RECEIPT		
RECEIVED FROM [REDACTED]		
ADDRESS: [REDACTED]		
FOR Rent a car payment for November 2014 DOLLARS \$ 800.00		
ACCOUNT	HOW PAID	
AMOUNT OF ACCOUNT	CASH <input checked="" type="checkbox"/>	
AMOUNT PAID	CHECK / C.C. <input type="checkbox"/>	
BALANCE DUE	MONEY ORDER <input type="checkbox"/>	
BY [REDACTED] Thank You!		

OFFICIAL RECEIPT		
RECEIVED FROM [REDACTED]		
ADDRESS: [REDACTED]		
FOR Rent a car payment for December 2014 DOLLARS \$ 800.00		
ACCOUNT	HOW PAID	
AMOUNT OF ACCOUNT	CASH <input checked="" type="checkbox"/>	
AMOUNT PAID	CHECK / C.C. <input type="checkbox"/>	
BALANCE DUE	MONEY ORDER <input type="checkbox"/>	
BY [REDACTED] Thank You!		

III. Integrity Violations and Debarments

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





Zero Tolerance ≠ Zero Occurrence

Integrity Violations



Remedial Actions



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

Mitigating
circumstances

Baseline period: 3 years

Aggravating
circumstances



Debarment

Temporary Suspension

Reprimand

Caution

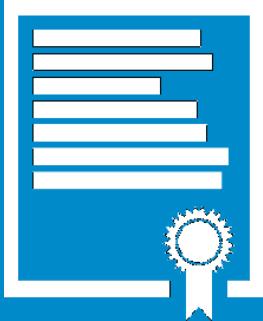
Case Study

- “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

- 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**

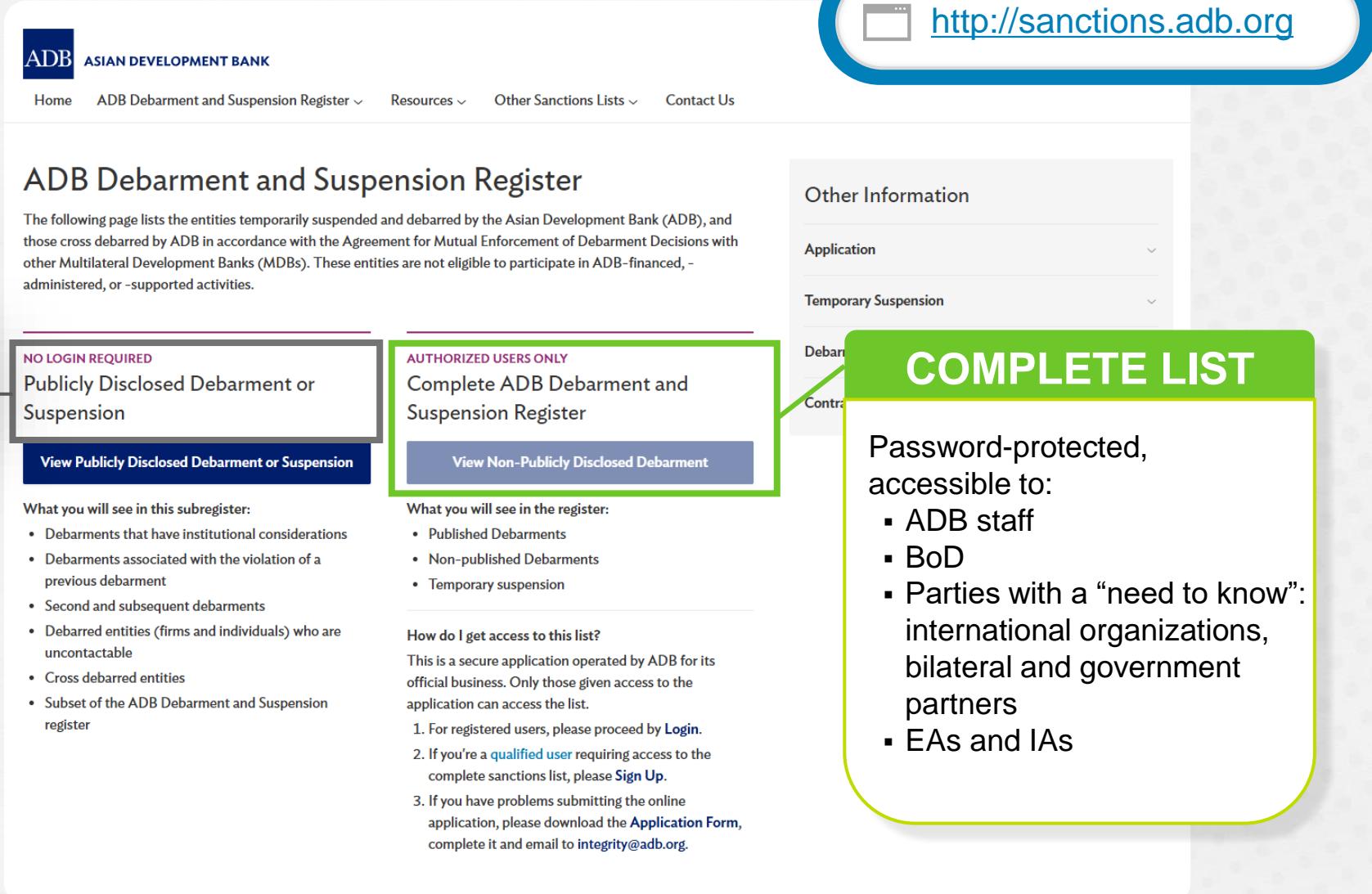


Debarment and Suspension Checks

ADB

PUBLISHED LIST

Accessible to the public



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.

 <http://sanctions.adb.org>

Other Information

Application

Temporary Suspension

Debar

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

ADB ASIAN DEVELOPMENT BANK

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

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<http://sanctions.adb.org>

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

ADB

ADB ASIAN DEVELOPMENT BANK

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

Complete ADB Debarment and Suspension Register

Entity Type	Name ↑	Address ↓	Sanction Type	Other Name / Logo	Nationality	Effect Date Lapse Date	Grounds ↓	Changes Made on
Entity Type 1	Name 1	Address 1	Sanction Type 1	Other Name / Logo 1	Nationality 1	Effect Date Lapse Date 1	Grounds 1	Changes Made on 1
Entity Type 2	Name 2	Address 2	Sanction Type 2	Other Name / Logo 2	Nationality 2	Effect Date Lapse Date 2	Grounds 2	Changes Made on 2
Entity Type 3	Name 3	Address 3	Sanction Type 3	Other Name / Logo 3	Nationality 3	Effect Date Lapse Date 3	Grounds 3	Changes Made on 3

Navigating: ADB Debarment and Suspension Register

ADB

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Complete ADB Debarment and Suspension Register

Search  Entity Type Sanction Type Nationality Cross-Debarred

Search Results

Entity Type	Sanction Type	Nationality	Cross-Debarred
Entity 1	Sanction 1	Nationality 1	Yes
Entity 2	Sanction 2	Nationality 2	No
Entity 3	Sanction 3	Nationality 3	Yes
Entity 4	Sanction 4	Nationality 4	No
Entity 5	Sanction 5	Nationality 5	Yes

Navigating: ADB Debarment and Suspension Register

ADB

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Complete ADB Debarment and Suspension Register

Search Bar

Filters

Entity Type	Name ↑	Address ↓	Sanction Type	Other Name / Logo	Nationality	Effect Date Lapse Date	Grounds ↓	Changes Made on
Entity Type 1	Name 1	Address 1	Sanction Type 1	Other Name / Logo 1	Nationality 1	Effect Date Lapse Date 1	Grounds 1	Changes Made on 1
Entity Type 2	Name 2	Address 2	Sanction Type 2	Other Name / Logo 2	Nationality 2	Effect Date Lapse Date 2	Grounds 2	Changes Made on 2
Entity Type 3	Name 3	Address 3	Sanction Type 3	Other Name / Logo 3	Nationality 3	Effect Date Lapse Date 3	Grounds 3	Changes Made on 3

Search: ADB Debarment and Suspension Register

ADB



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
Logo

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

ADB



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?

ADB

The screenshot shows the ADB website with a navigation bar at the top. The navigation bar includes links for News and Events, ADB Institute, Contact, and English. The 'WHO WE ARE' section is highlighted. Below the navigation bar is a secondary navigation menu with links for Home, Report Integrity Violations, Our Work (with a dropdown arrow), Advisories and Sanctions (with a dropdown arrow), Activities, and Cross Debarment. A search bar is also present. The main content area features a heading 'Report Integrity Violations' and a button labeled 'Submit an Online Complaint'. Below this are several questions with expandable arrows: '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'. To the right of the main content is a 'Related' sidebar 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'. At the bottom right is a 'Warning' box with the text 'Beware of scams using ADB's name' and a warning icon. Another box below it contains the text 'ADB Debarment and Suspension Register' with a document icon.

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

Integrity Risk Management is Everyone's Responsibility



Other Resources

ADB



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



@anticorruptionandintegrity



anticorruption@adb.org
integrity@adb.org



@adb_oai



+63-2-8632 5004



ADB Anticorruption and Integrity



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



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