

# The Integrity Learning Series

## Anticorruption and Integrity Orientation Program for Project Directors Sri Lanka Resident Mission

**Steven Wong**  
Senior Integrity Specialist

4 April 2025



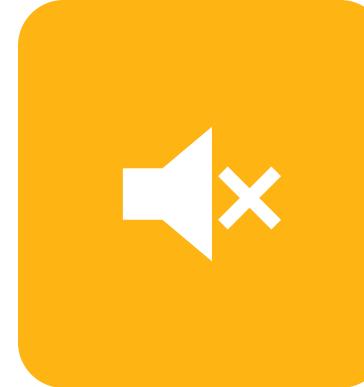
# Reminders



The session is  
being recorded.



Type in your  
questions through the  
chat box at any time.



Please remain on  
mute if not speaking.



## Question

**What is the most relevant responsibility of government in promoting integrity?**

- A. Develop and enforce clear laws and regulations against corruption.
- B. Foster transparency and accountability in public institutions.
- C. Provide adequate resources and training for ethical conduct in government.

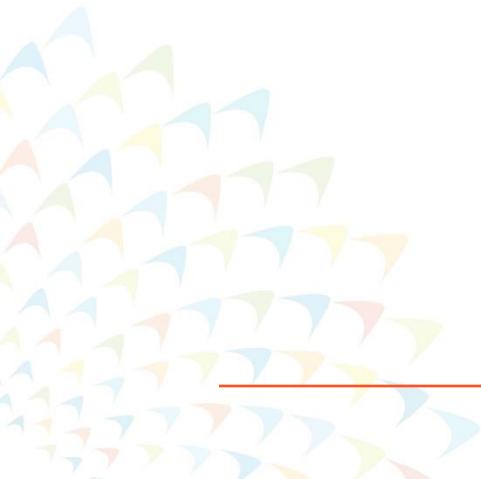


Scan the QR Code or go to [menti.com](https://menti.com) and enter code **1605 1770**

More than **5%** of global GDP

Every year, **\$1 trillion** is paid in bribes,  
while an estimated **\$2.6 trillion** is lost through  
corruption.

United Nations Security Council  
10 September 2018



“

Corruption is the  
**single greatest  
obstacle to  
economic and  
social  
development  
around the world.**

## Scenario

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

What would you do:

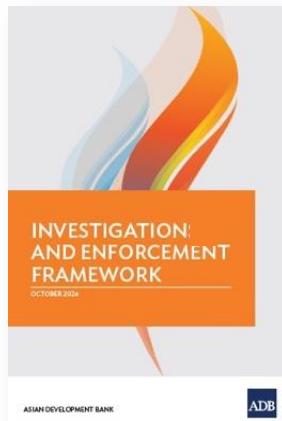
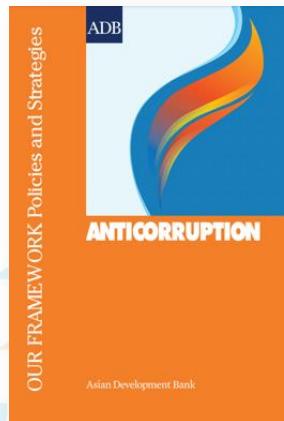
1. Keep the money: “Finders keepers!”
2. Turn in the wallet intact to the Lost and Found counter.
3. Contact the owner using the ID to return the wallet.



**Scan the QR Code or  
go to [menti.com](https://menti.com) and  
enter code 1605 1770**

# 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.



# What to Expect

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- I. Integrity Violations
- II. Recognizing and Reducing Integrity Risk
- III. Enforcement Actions and Impacts



# I. Integrity Violations

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# Quiz

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**Scan to participate**

Or go to **menti.com**  
and enter code  
**1605 1770**





# Rural Roads Rehabilitation Project



ADB Irrigation and  
Water Project

**BIDDING IS  
NOW OPEN**



ADB



ADB

# Restaurant



ADB

# Invitation For Bids

## Bidding Announcement

We hope you all had a nice holiday season and a big congrats to all of our single cell! **Blurred** **control** **systems**. Thank you all once again for making it such a wonderful season and a big thank you to all of you for all the staff! **Stay** **safe** **and** **have** **your** **own** **chances** **at** **winning** **next** **year**!

We have some  
expectations that you would  
make sure that you will  
have about the first  
and go over in the new  
highly anticipated  
book because they can  
only describe  
countries and typical



### Some Standard Terms

We have some  
updates that we wanted to  
make sure that you were  
aware about. The first will  
still go out in the next and  
highly anticipated show  
but because you can only download your  
creation and update from  
us you will see these

Contract No. and Title:  
ICB No-XA/EA/1A/C2

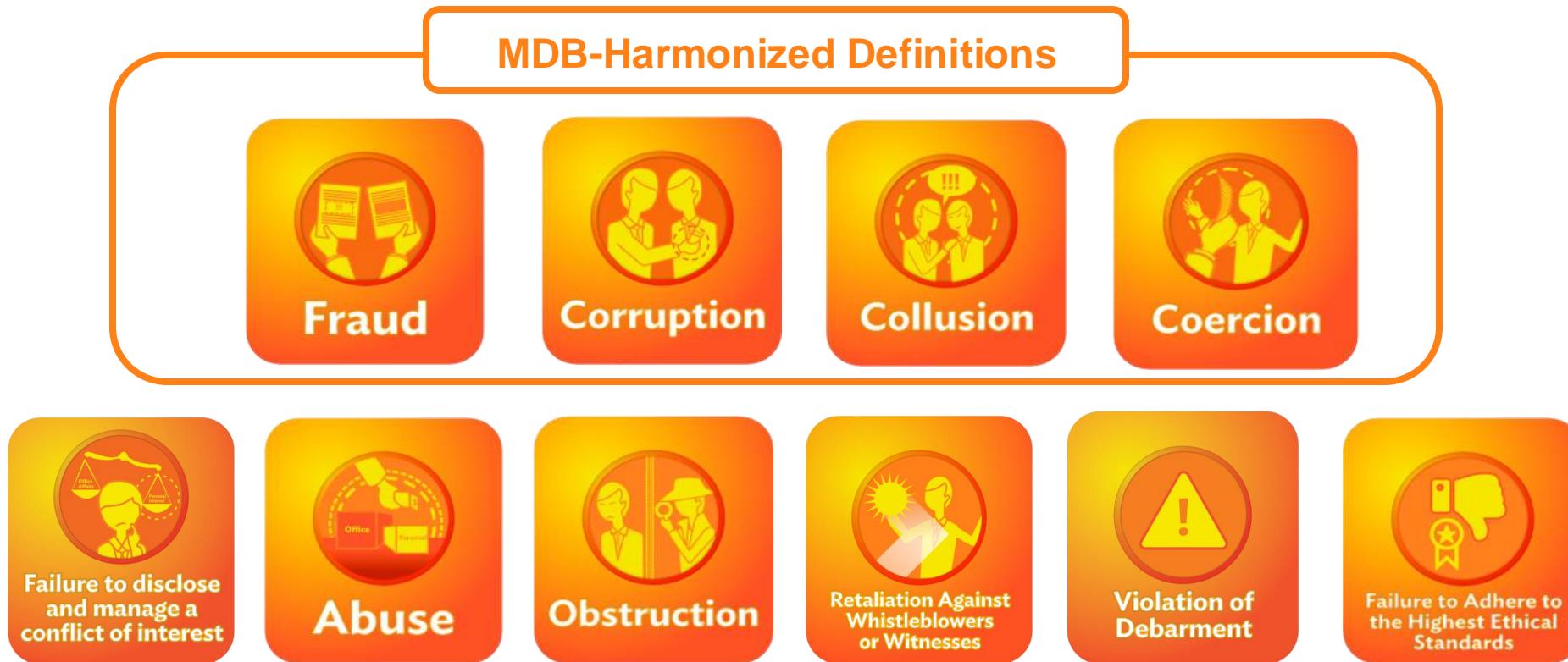
When you have selected the video you would like to download, understand it, you will see a large orange button that says "Download selected video". This is the button you will need to click. There is a box for this feature and it does depend on the length of the video. However, the first download is automatic (100%), and successive download





ADB

# Integrity Violations



## II. Recognizing and Reducing Integrity Risks

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- **Red Flags**
- Due Diligence



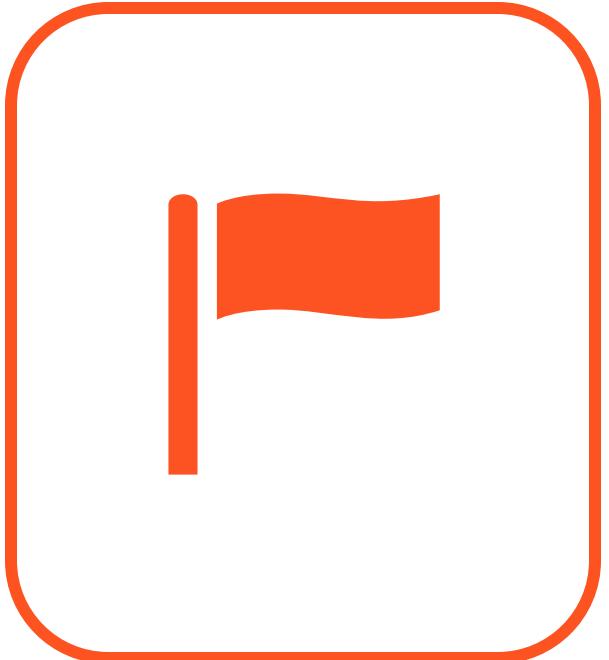
# What is Integrity Risk?



## 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.





**Be alert to the  
red flags of  
integrity risks.**



# Project Implementation Processes

## Procurement

- ─ **Bidding**  
Prequalification; bidding documents preparation; 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 2 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



**John Mark**  
Software Engineer

**Contact Details**

- Phone: +1 2345 67
- Email: example@gmail.com
- Address: #3 road, city/state - 00111

**Skills**

- Object-Oriented Programming
- Database management
- Web development
- Problem-solving
- Communication

**Languages**

- English: Fluent
- French: Intermediate

**Profile**

Experienced full-stack web developer proficient in Java, Python, and JavaScript, with 5+ years of industry experience. Skilled in React, Node.js, PostgreSQL, and AWS, and holds certifications in AWS and Oracle. Known for strong problem-solving skills and for developing highly scalable systems. Seeking a lead software engineer role in the finance, healthcare, or e-commerce industry.

**Work Experience**

**Senior Software Developer** (Jan 2021 – Dec 2022)  
Company – Country

- Develop and test software for XYZ product
- Collaborate with cross-functional teams to ensure product quality and timely delivery

**Web Developer** (Jan 2020 – Oct 2020)  
Company – Country

- Developed responsive and accessible web applications using HTML, CSS, and JavaScript frameworks such as Angular and React
- Collaborated with UX designers and back-end developers to ensure seamless integration of front-end and back-end functionalities

**Education**

**Masters in Software Engineering** (Jan 2009 – Dec 2020)  
Location

**Bachelors in Computer Science** (Jan 2015 – Dec 2018)  
Location



# ChatGPT

# CV

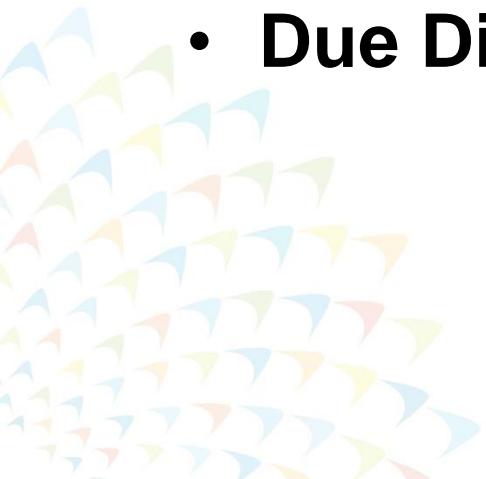


The image shows a fake CV for a ChatGPT AI model. The CV is presented on a light blue background with a dark blue header. The title 'ChatGPT' is in large white font, and 'CV' is in a large, bold white font. Below the title is a green square containing a white ChatGPT logo, which is a stylized, interlocking circular pattern.

## II. Recognizing and Reducing Integrity Risks

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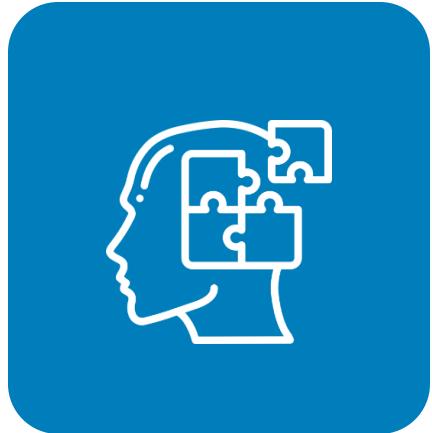
- Red Flags
- **Due Diligence**



# Perform integrity due diligence

Process of checking the accuracy of information of a business or individual prior to, during, and after engaging in a contract and informs risk mitigation





**WHY?**



**WHO?**



**WHEN?**



# Due Diligence: Some Factors



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

# Potential Risk Flags



Bribery, corruption



Criminal convictions



Fraud, embezzlement



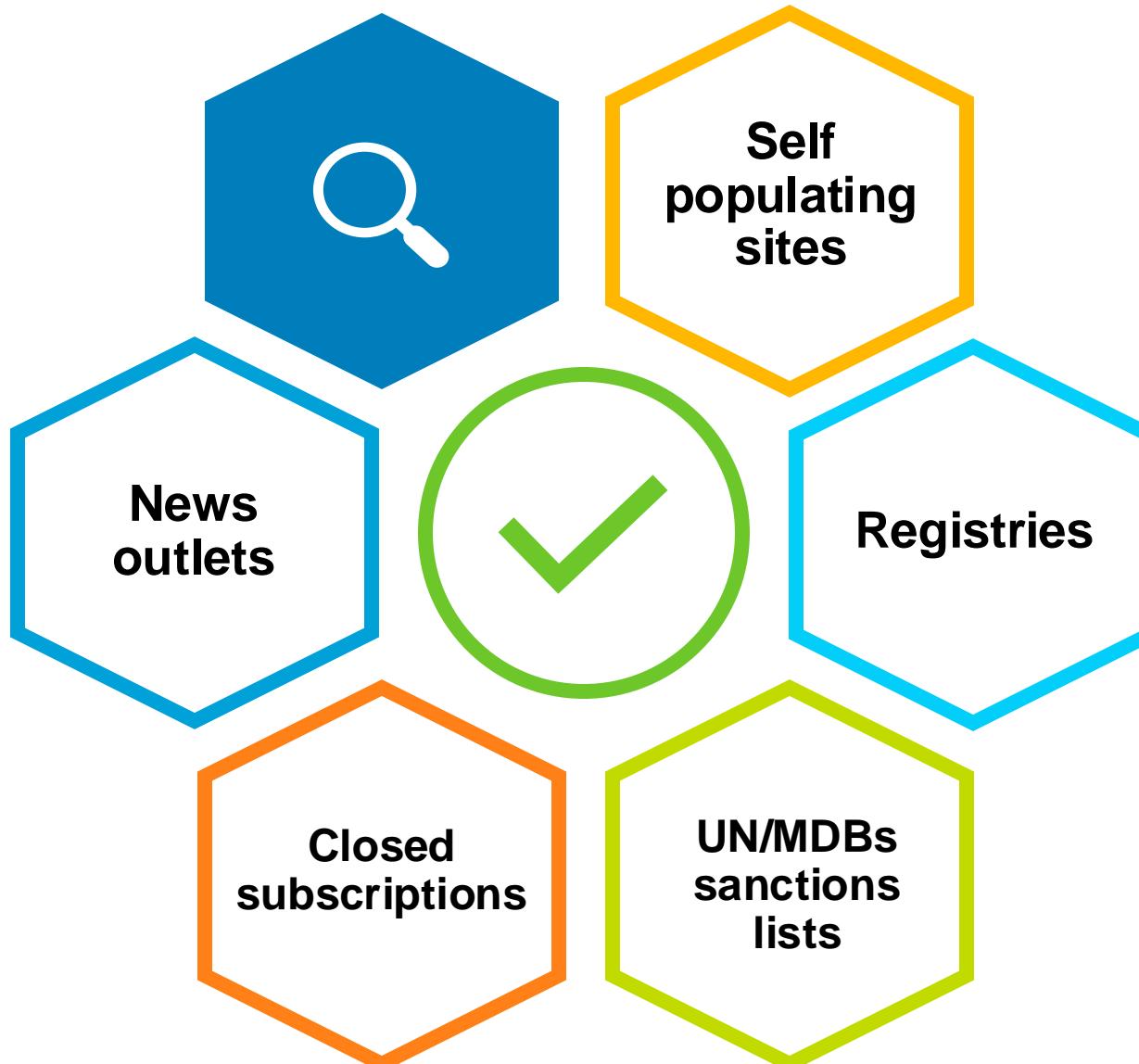
Illegal or disreputable activities



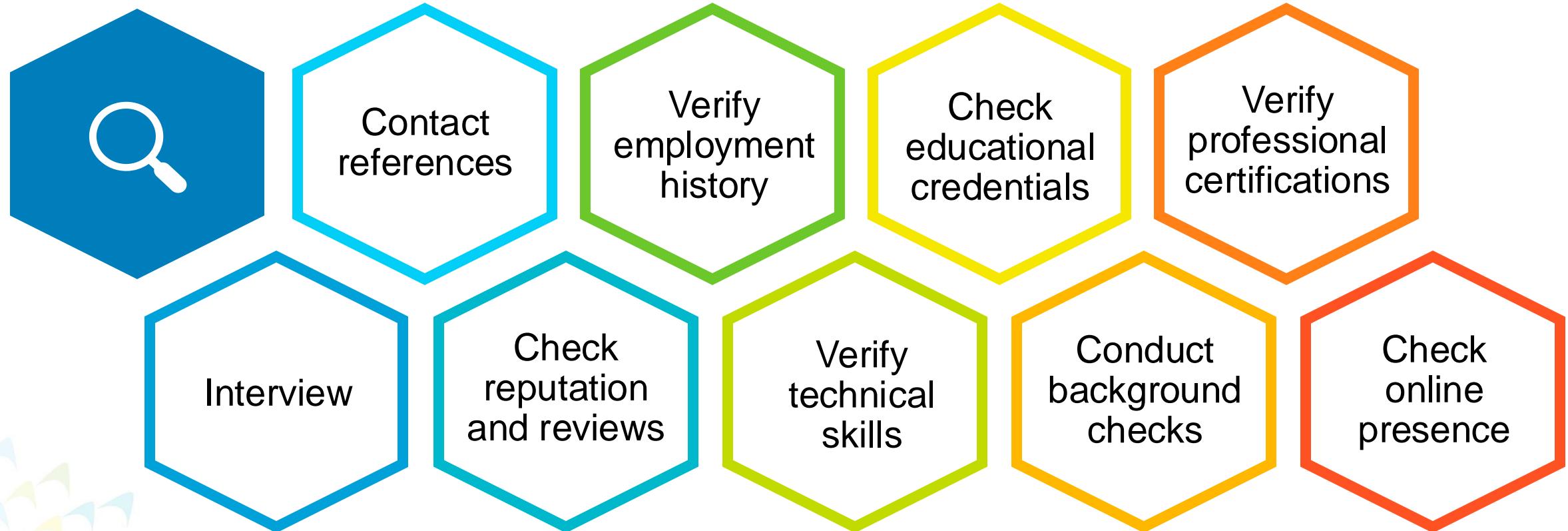
Money laundering,  
terrorist financing



# Due Diligence: Sources



# Due Diligence: Some Steps



# Search Techniques

## Use:

### Specific Keywords

Jonathan vs Jonathan **Colombo engineer**

And

“road construction” **AND** “environmental impact”

### Quotation Marks

“Badulla road project”

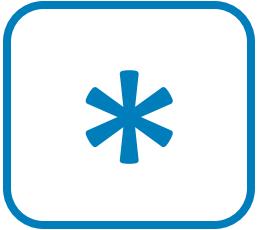
Or

education **OR** training

### Minus Operator (-)

“bridge construction projects” **-** “toll bridges”

# More Search Techniques



Asterisk (\*)  
as a wildcard



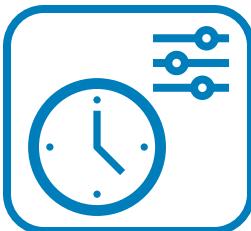
Site-specific  
searches



Advanced  
search options



Related  
searches



Time filters



Google Scholar



Reverse image  
search



# Debarment and Suspension Checks



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.

**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 uncontrollable
- 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).



<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



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

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Publicly Disclosed Debarment or Suspension

[View Publicly Disclosed Debarment or Suspension](#)

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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 ASIAN DEVELOPMENT BANK

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

## 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



# Search: 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



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

Page 1 of



# United Nations Security Council Sanctions: Obligations



# United Nations Security Council Sanctions



Security Council

EN

SEARCH

Search

FORCES DEMOCRATIQUES DE LIBERATION DU RWANDA



## 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).

To Save this page as a PDF document 1) click the "Print to PDF" button 2) Select desired printer Save to PDF or the option that your system provides 3) click the print button 4) Select the destination on your machine to save the pdf document

Print to PDF



United Nations Security Council Consolidated List

Generated on: 31 July 2024

Generated on refers to the date on which the user accessed the list and not the last date of substantive update to the list. Information on the substantive list updates are provided on the Council / Committee's website."

Composition of the List

The list consists of the two sections specified below:

A. Individuals

B. Entities and other groups

Information about de-listing may be found at:

<https://www.un.org/securitycouncil/ombudsman/> (for res. 1267)  
<https://www.un.org/securitycouncil/sanctions/decision/> (for other Committees)  
<https://www.un.org/securitycouncil/content/2231/list/> (for res. 2231)

A. Individuals

CD.001 Name: 1. ERIC 2. BADEGE 3. na 4. na

Title: na Designation: na DOB: 1971 POB: Good quality a.k.a.: na Low quality a.k.a.: na Nationality: Democratic Republic of the Congo Passport no: na National identification no: na Address: Rwanda as of early 2016 Listed on: 31 Dec 2012 (amended on 13 Oct 2016) Other information: He fled to Rwanda in March 2013 and is still living there as of early 2016. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals> click here

CD.002 Name: 1. FRANK KAKOLELE 2. BWAMBALE 3. na 4. na

Title: na Designation: FARDc General DOB: na POB: Good quality a.k.a.: a) FRANK KAKORERE b) FRANK KAKORELE BWAMBALE c) AIGLE BLANC Low quality a.k.a.: na Nationality: Democratic Republic of the Congo Passport no: na National identification no: na Address: Kinshasa, Democratic Republic of the Congo (as of June 2016) Listed on: 1 Nov. 2005 (amended on 13 Oct. 2016) Other information: Left the CNDP in January 2008. As of June 2011, reportedly, he was a member of the FARDC, including participation in STARD's mission to Goma and Beni. In November 2013, DRC authorities arrested him in December 2013 in Beni, North Kivu Province, for allegedly blocking the DDR process. He left the DRC and lived in Kenya for some time, before being called back by the DRC Government to assist them with the situation in the territory of Beni. He was arrested in October 2015 in the area of Mambasa for allegedly supporting a Mai Mai group, but no charges were brought and as of June 2016, he lived in Kinshasa. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals> click here

CD.003 Name: 1. GASTON 2. IYAMUREMYE 3. na 4. na

Title: na Designation: a) FDLR Interim President b) FDLR-FOCA 1st Vice-President c) FDLR-FOCA Major General DOB: 1948 POB: Musanze District, Northern Province, Rwanda Good quality a.k.a.: b) Byiringiro Victor Ruhumbi b) Victor Ruhumuri c) Michel Byiringiro Low quality a.k.a.: Ruhum Nationality: Rwanda Passport no: na National identification no: na Address: North Kivu Province, Democratic Republic of the Congo (as of June 2016) Listed on: 1 Dec. 2010 (amended on 13 Oct. 2016) Other information: INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals> click here

CD.004 Name: 1. INNOCENT 2. KAINA 3. na 4. na

Title: na Designation: Former M23 Deputy Commander DOB: (Nov. 1973 ) POB: Bunagana, Rutshuru territory, Democratic Republic of the Congo Good quality a.k.a.: Colonel Innocent KAINA Low quality a.k.a.: India Queen Nationality: na Passport no: na National identification no: na Address: Uganda (as of early 2016) Listed on: 30 Nov. 2012 (amended on 13 Oct. 2016) Other information: Became M23 deputy commander after the flight of Bosco Ntaganda's faction to Rwanda in March 2013. Fled to Uganda in November 2013. In Uganda as of early 2016. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals> click here

CD.005 Name: 1. JEROME 2. KAKWAVU BUKANDE 3. na 4. na

Title: na Designation: na DOB: Goma, Democratic Republic of the Congo Good quality a.k.a.: Jérôme Kakwava Low quality a.k.a.: Commandant Jérôme Nationality: Democratic Republic of the Congo Passport no: na National identification no: na Address: na Listed on: 1 Nov. 2009 Other information: Given the rank of General in the FARDC in December 2004. As of June 2011, detained in Makala prison in Kinshasa. As of 23 March 2011, the High Military Court in Kinshasa opened a trial against Kakwava for war crimes. In November 2014, convicted by a DRC military court to ten years in prison for rape, murder, and torture. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals> click here

CD.006 Name: 1. GERMAIN 2. KATANGA 3. na 4. na

Title: na Designation: na DOB: 23 Apr. 1946 POB: Lubumbashi, Katanga Province, Democratic Republic of the Congo Good quality a.k.a.: na Low quality a.k.a.: na Nationality: Democratic Republic of the Congo Passport no: na National identification no: na Address: Democratic Republic of the Congo (in prison) Listed on: 1 Nov. 2005 (amended on 13 Oct. 2016) Other information: Appointed General in the ARDC in December 2004. Handled over by the Government of the DRC to the International Criminal Court on 18 October 2007. Initially convicted on 23 May 2014 by the ICC to 12 years in prison for war crimes and crimes against humanity. The ICC Appeals Chamber reduced his sentence and determined that Katanga's sentence should be completed on 18 January 2016. Although he was detained in the Netherlands for the duration of his trial, Katanga was transferred to a DRC prison in December 2015 and charged for other crimes previously committed in 1998. click here

Search options

Link to United Nations Security Council List

<https://www.un.org/securitycouncil/i/content/un-sc-consolidated-list>

ADB

## III. Enforcement Actions and Impacts

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# Consequences of Integrity Violations in ADB-supported Projects



**Debarment** of firms or individuals



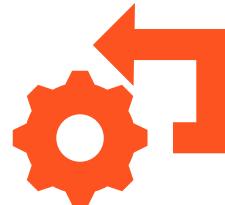
**Suspension** of loan or grant allocations



**Termination** of loan or grant allocations



**Return** of misused loan or grant resources to ADB



Changes of administrative arrangements



Request to **investigate or change** government staff



Cross debarment



# Enforcement Actions



**Debarment**



**Debarment  
with conditional  
reinstatement**



**Conditional  
Non-Debarment**



**Reprimand**



**Restitution and / other  
financial remedies**

# Impact While Under Debarment

Current contacts



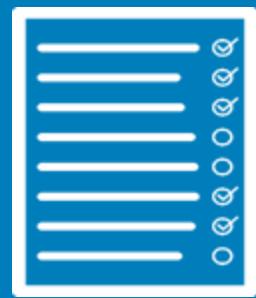
MAY  
CONTINUE

Contract  
variations



OAI  
ENDORSEMENT

Future tenders



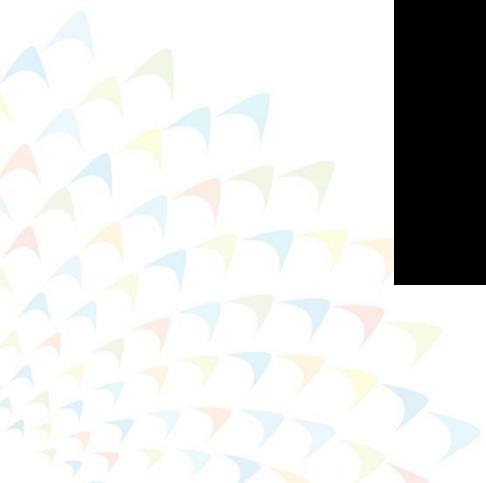
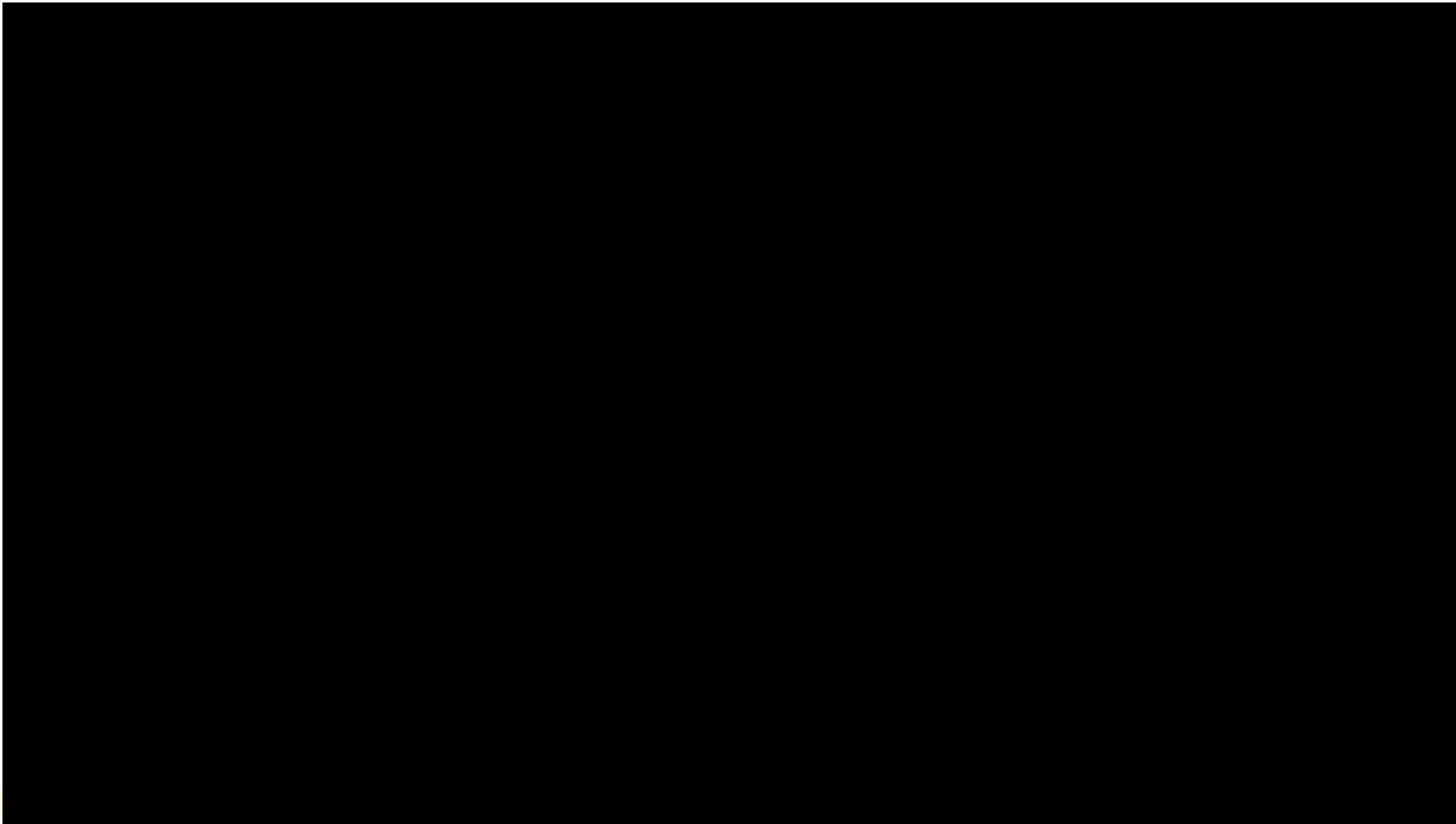
NOT PERMITTED

Reinstatement



NOT AUTOMATIC

# Integrity is everybody's business.



# Other Resources



# Remember



Know the integrity violations.



Sign up for access to the Complete List.



Do due diligence.



Manage integrity risks.

**If Everyone assumes that Someone is doing it, No one will end up doing it.**



**Report integrity violations to OAI**

# 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)



@anticorruptionandintegrity



anticorruption@adb.org  
integrity@adb.org



@adb\_oai



+63-2-8632 5004



ADB Anticorruption and Integrity



Report integrity violations :  
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