



Office of Anticorruption and Integrity

The Integrity Learning Series

Marshall Islands: Anticorruption and Integrity Training

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5 March 2025
Hybrid Session

Reminders



The session is
being recorded.



Q&A after the
presentation.



Prepare your
devices.

Scenario

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

What would you do:

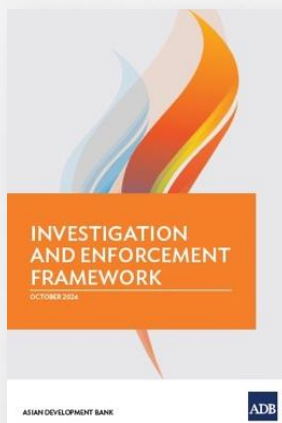
1. Keep the money: “Finders keepers!”
2. Turn in the wallet intact to the Lost and Found counter.
3. Contact the owner using the ID to return the wallet.



Scan the QR Code or go to menti.com and enter code **8999 1503**

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.





We must fight corruption on every level.

What to expect

- I. Integrity Violations
- II. Recognizing and Reducing Integrity Risk
- III. Enforcement Actions and Impact
- IV. Conflict of Interest in Projects

I. Integrity Violations

Quiz



Or go to **menti.com**
and enter code
8999 1503

Scan to participate

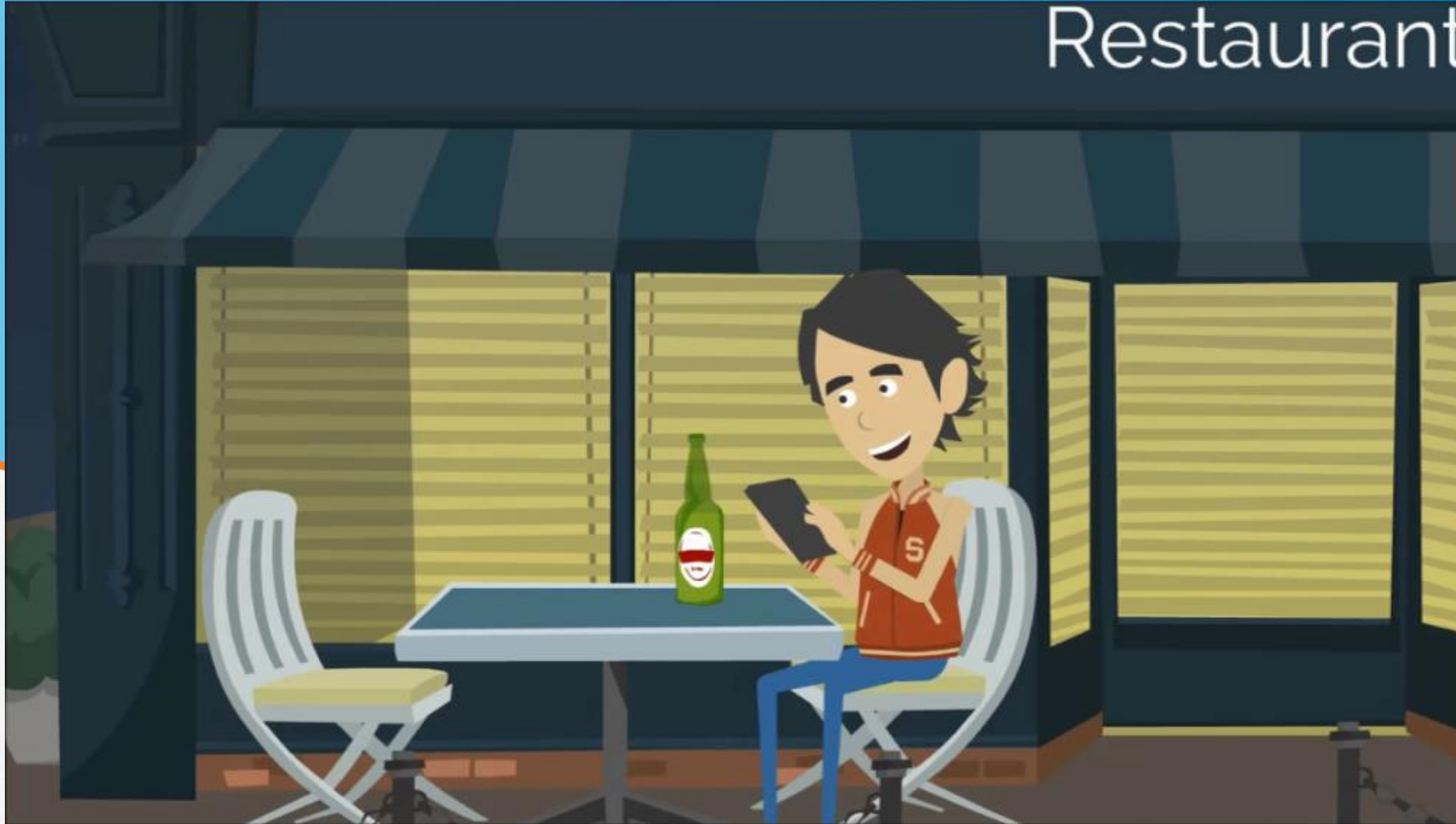


Rural Roads Rehabilitation Project





Restaurant



Invitation For Bids

Bidding Announcement

[illegible]

We have some exciting updates that we wanted to make sure that you guys knew about. The first one I will go over is the new and highly anticipated new look format. Yep, now you can easily download your favorites and upload them



New Download Feature

Now Decentralized Finance (DeFi) has come along to replace that too-much-to-type solution that has you going down a list of links to learn about the first one, and still go over to the same old, highly antiquated, non-highly-maintained Web page to find financial data. You can now easily decentralize your investment and replace them with a much more than an

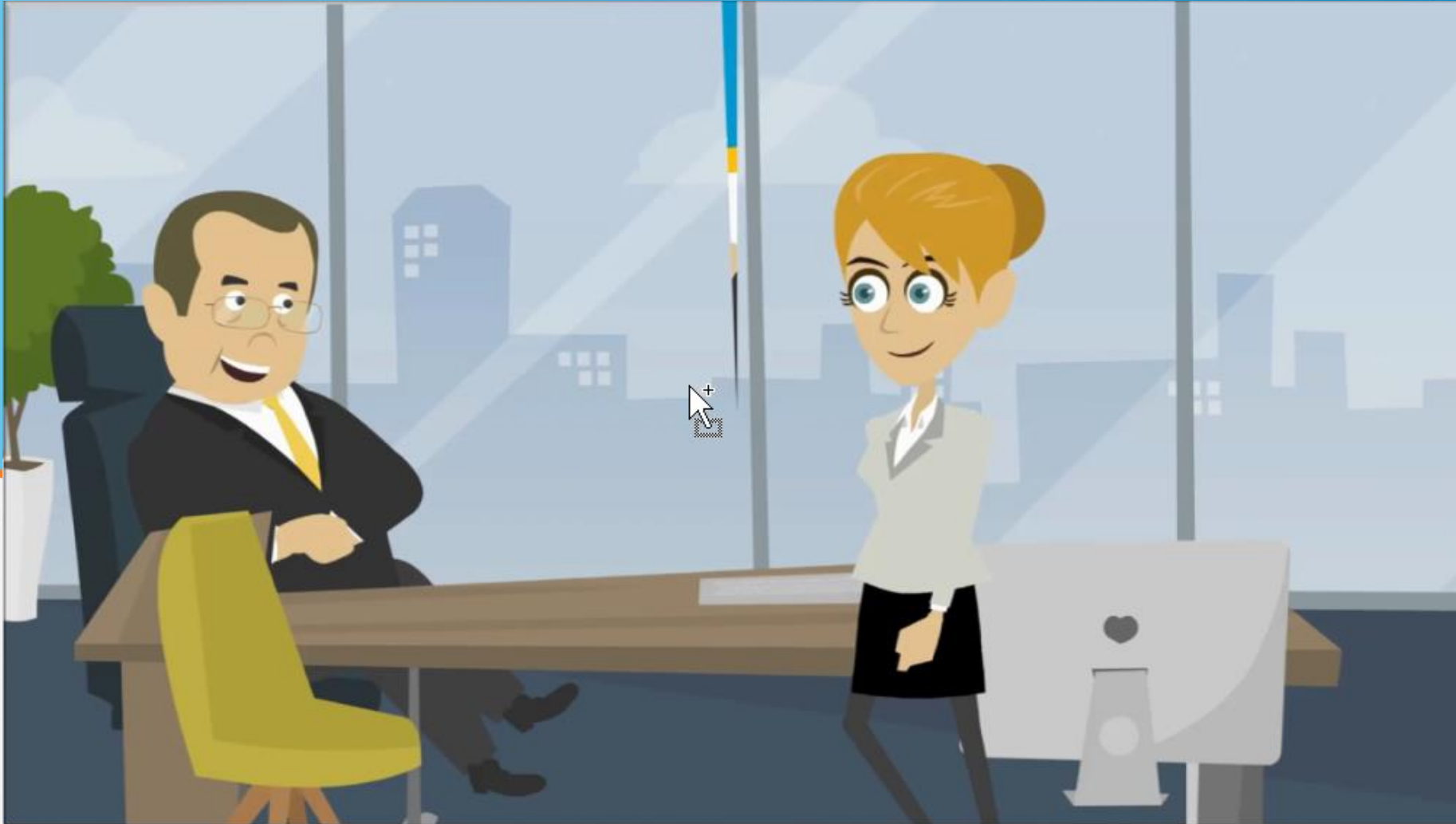
Contract No. and Title:
ICB No-XA/EA/1A/C2

We hope you all had a nice healthy summer and a big congrats to all of our Chicago staff. However, summer's over. Thank you all once again for making it such a successful summer and a lot of fun to be a part of the all the staff! We need for your word choice to select the staff some exciting great stuff!

We have never meeting
 explains that we wanted to
 make sure that you were
 aware of this. The first one I
 will go over is the new and
 highly anticipated...
 last month. Why, are you
 not really interested in
 creating and updating them.
 In practice, we have an

[illegible]

Collusion



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

II. Recognizing and Reducing Integrity Risk

- **Red Flags**
- Due Diligence

What is Integrity Risk?



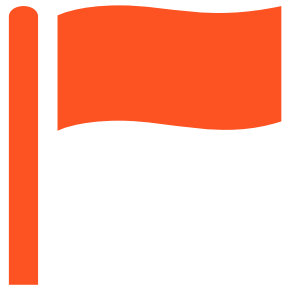
Integrity Risk

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.

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.











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 to support bidder's financial capacity.

Financial statements from different years have identical data. 




Unaudited financial statements without first establishing that the law in the bidders' countries/ jurisdictions did not mandate financial statements to be audited. By default, the bidding documents required submission of audited financial statements, while unaudited financial statements are allowed only on an exceptional basis.



Value of a bidder's cash and cash equivalents declared in the bidding form, which was higher than the value in the submitted audited financial 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



Represented years of experience based on submitted resume. ⚠
Using personnel from debarred entities.

Fake CVs or credentials



II. Recognizing and Reducing Integrity Risk

- Red Flags
- **Due Diligence**



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



Fraud, embezzlement



Money laundering, terrorist financing



Criminal convictions



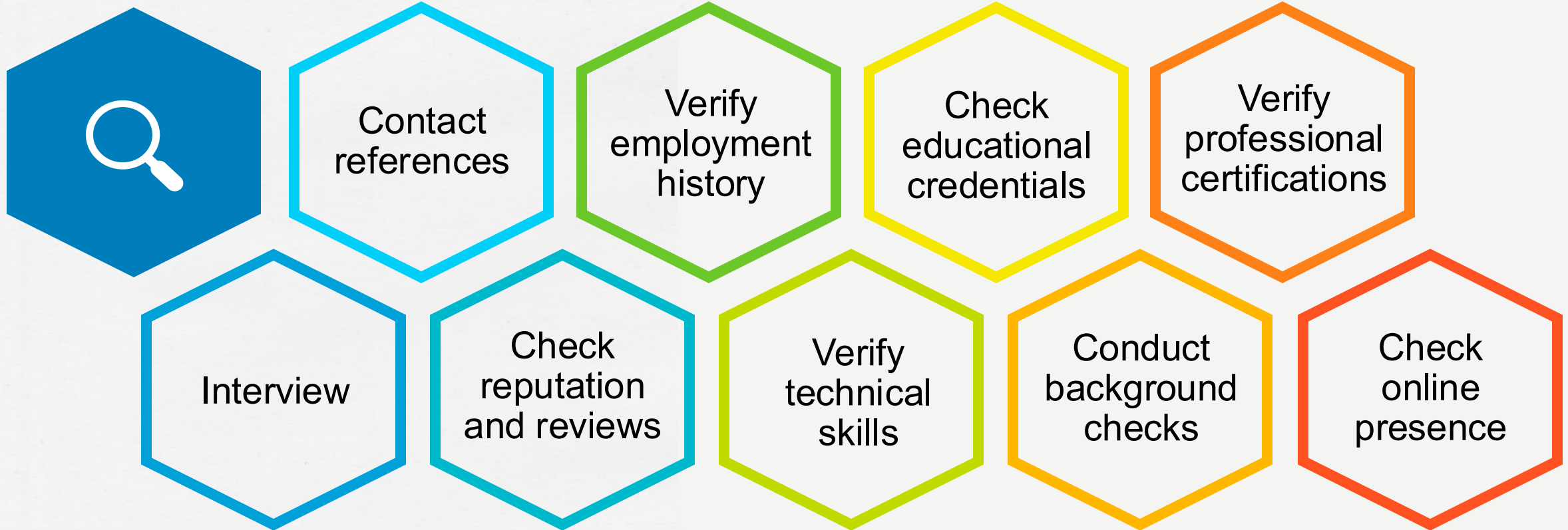
Illegal or disreputable activities



Due Diligence: Sources



Due Diligence: Some Steps



Search Techniques

Use:

Specific Keywords

Jonathan vs Jonathan **Mumbai engineer**

And

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

Quotation Marks

“Calcutta road project”

Or

education **OR** training

Minus Operator (-)

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

More Search Techniques



Asterisk (*)
as a wildcard



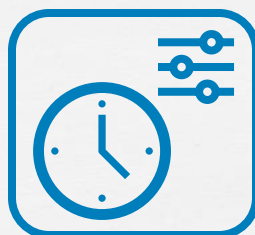
Site-specific
searches



Advanced
search options



Related
searches



Time filters



Google Scholar



Reverse image
search

Debarment and Suspension Checks

 <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.

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

 **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 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* Organization / Agency*

I.e. Deputy Secretary / Proj Officer 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

ADE

...rity!

United Nations Security Council Sanctions: Obligations



United Nations Security Council Sanctions

United Nations Security Council

EN X 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.

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:

- Individuals
- Entities and other groups

Information about de-listing may be found at:
<https://www.un.org/securitycouncil/ombudsperson/for res. 1267>
<https://www.un.org/securitycouncil/sanctions/de-listing> (for other Committees)
<https://www.un.org/securitycouncil/content/2231.html> (for res. 2231)

Individuals

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](#)

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 KAKORERE 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, resides in Kinshasa. Since 2010, Kakolele has been involved in activities apparently on behalf of the DRC government's Programme de stabilisation et Reconstruction des Zones Sortant des Conflits Armés (STAREC), including participation in a STAREC mission to Goma and Beni in March 2011. 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](#)

1. GASTON 2. IVAMUREMYE 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.:** a) Byiringiro Victor Rumuli b) Victor Rumuli c) Michel Byiringiro **Low quality a.k.a.:** Rumuli **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](#)

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 Taganda'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](#)

1. JÉRÔME 2. KAKWAVU BUKANDE 3. na 4. na
Title: na **Designation:** na **DOB:** na **POB:** Goma, Democratic Republic of the Congo **Good quality a.k.a.:** Jérôme Kakwavu **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. 2005 **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 25 March 2011, the High Military Court in Kinshasa opened a trial against Kakwavu 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](#)

1. GERMAIN 2. KATANGA 3. na 4. na
Title: na **Designation:** na **DOB:** 18 Apr. 1978 **POB:** Mambasa, Ituri 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 FARDC in December 2004. Handed 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 Ituri. [click here](#)

Search options

[Link to United Nations Security Council List](https://www.un.org/securitycouncil/content/un-sc-consolidated-list)

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

III. Enforcement Actions and Impact

- Consequences of Integrity Violations in ADB-supported Projects
- Enforcement Actions
- Impact While Under Debarment

Consequences of Integrity Violations in ADB-supported Projects



Debarment of firms or individuals



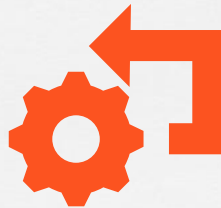
Suspension of loan or grant allocations



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

IV. Conflict of Interest in Projects

- ADB definition of conflict of interest
- Conflict of interest in projects
- Potential grounds for disqualification
- Managing conflict of interest

A situation in which a party has **interests** that could **improperly influence** that party's performance of official duties or responsibilities, contractual obligations, or compliance with applicable laws and regulations

**Conflict of interest is not corruption,
but if inadequately managed,
can result in corruption**





Conflict of interest in projects



May be a ground
for disqualification



May or may not be
an integrity violation

Potential grounds for disqualification



Drafting technical specifications for the package in question



Relationship with ADB staff or borrower personnel involved in the procurement



Bidders for the same package with common controlling shareholder

Managing conflict of interest



```
graph LR; A[Identify] --> B[Disclose]; B --> C[Mitigate];
```

Identify

Disclose

Mitigate

Identify

Disclose

Mitigate

4.3 A Bidder shall not have a conflict of interest. All Bidders found to have a conflict of interest shall be disqualified. A Bidder may be considered to be in a conflict of interest with one or more parties in the bidding process if any of, including but not limited to, the following apply:

(a) they have controlling shareholders in common; or

(d) they have a relationship with each other, directly or through common third parties, that puts them in a position to have access to material information about or improperly influence the bid of another Bidder, or influence the decisions of the Employer regarding this bidding process; or

(f) a Bidder, Joint Venture partner, associates, parent company, or any affiliated entity, participated as a Consultant in the preparation of the design or technical specifications of the works that are the subject of the Bid; or

(i) A Bidder that has a financial or familial relationship with Employer's personnel including personnel of project implementing/executing agency, or of a recipient of a part of the loan who: (i) are directly or indirectly involved in the preparation of the bidding documents or specifications of the contract, and/or the bid evaluation process of such contract; or (ii) would be involved in the implementation or supervision of such contract unless the conflict stemming from such relationship has been resolved in a manner acceptable to ADB throughout the procurement process and execution of the contract. [User Guide for Procurement of Works]

Identify

Disclose

Mitigate

We, our directors, key officers, key personnel, including any Subcontractors, consultants, subconsultants, manufacturers, service providers or Suppliers for any part of the contract, do not have any conflict of interest in accordance with ITB 4.3.

If there is any conflict of interest, please state details:

(i) Parties involved in the conflict of interest: _____

(ii) Details about the conflict of interest: _____

[Letter of Bid]

Identify

Disclose

Mitigate



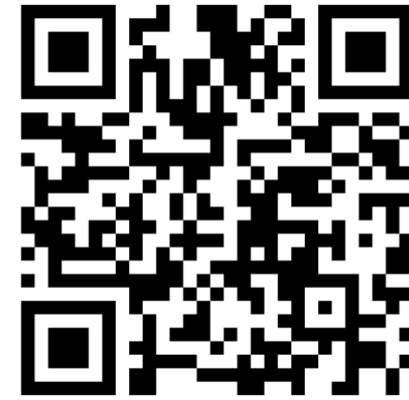
Implement mitigation
measures



If not possible, exclude from
bidding or reject a proposal
for contract award

Mentimeter Scenario

- The EA is hiring a Safeguards Coordinator who will support the 3 IAs of the project and monitor compliance with the safeguards requirements of the 3 subprojects.
- The consultant's tasks will be performed under the guidance of the IAs.
- The candidate is a close relative of the head of one of the IAs (IA-1 Head).
- The IA-1 Head is responsible for implementing a subproject under that particular IA.
- IA-1 and its Head were not involved in preparing the TOR nor in the selection process.
- The Safeguards Coordinator will report to the PMU Director. He/she will not report to IA-1 or its Head.



Scan the QR Code or go to menti.com and enter code **8999 1503**

Mentimeter Scenario

What will be your recommendation:

1. Hire the candidate. There is no conflict of interest.
2. Disqualify the candidate because there is conflict of interest.
3. Hire the candidate but implement mitigation measures to address the conflict of interest.



Scan the QR Code or go
to menti.com and enter
code **8999 1503**

As a possible integrity violation



Conflict of interest is one of the integrity violations that ADB investigates



It may be addressed through mitigation measures



May constitute an integrity violation if not disclosed and managed

Other Resources



Remember



Know the integrity violations.



Sign up to access the Complete List.



Identify and manage integrity risks.



Report suspected integrity violations to OAI.

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



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ADB Anticorruption and Integrity



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



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