OFFICE OF ANTICORRUPTION AND INTEGRITY
2022 | ANNUAL REPORT
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## Abbreviations

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<th>Abbreviation</th>
<th>Definition</th>
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<tbody>
<tr>
<td>ADB</td>
<td>Asian Development Bank</td>
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<tr>
<td>AML/CFT</td>
<td>anti-money laundering and combating the financing of terrorism</td>
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<td>APVAX</td>
<td>Asia Pacific Vaccine Access Facility</td>
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<tr>
<td>BPMSD</td>
<td>Budget, People, and Management Systems Department</td>
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<tr>
<td>COVID-19</td>
<td>coronavirus disease</td>
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<tr>
<td>CPF</td>
<td>countering proliferation financing</td>
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<tr>
<td>DMC</td>
<td>developing member country</td>
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<tr>
<td>IEF</td>
<td>Investigations and Enforcement Framework</td>
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<tr>
<td>IOC</td>
<td>Integrity Oversight Committee</td>
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<tr>
<td>MDB</td>
<td>multilateral development bank</td>
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<tr>
<td>OAI</td>
<td>Office of Anticorruption and Integrity</td>
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<tr>
<td>OECD</td>
<td>Organisation for Economic Co-operation and Development</td>
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<tr>
<td>PIR</td>
<td>proactive integrity review</td>
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<tr>
<td>SAC</td>
<td>Sanction Appeals Committee</td>
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About the Office of Anticorruption and Integrity

The Asian Development Bank (ADB) is entrusted with public funds to help achieve its vision of a prosperous, inclusive, resilient, and sustainable Asia and Pacific region. In ADB’s Strategy 2030, ADB emphasizes that sustainable growth for our developing member countries is dependent on institutions and governance that are devoid of corruption and other integrity violations. The Office of Anticorruption and Integrity (OAI) leads the integrity risk management initiatives of ADB through its investigation and enforcement activities and its prevention and compliance advisory function.

OAI is an independent office that reports directly to the President and, through the President, to the Audit and Risk Committee of the Board of Directors. OAI has full and unrestricted access to all information, documents, and records relating to ADB activities, personnel, and property to accomplish its mandate.

As part of its investigation responsibility, OAI is the initial point of contact for all allegations of integrity violations in any ADB-related activity by staff or third parties. Thereafter, it conducts independent and objective investigations of suspected integrity violations and misconduct and, as appropriate, recommends measures to address the investigative findings.

As part of its prevention and compliance mandate, OAI undertakes proactive integrity reviews, and advises on integrity risk identification and management on ADB-related activities. This includes promoting ADB’s integrity-related policies and standards in ADB operations through training and other capacity building activities. OAI also provides technical assistance on the adoption of international standards to prevent fraud and corruption and combat illicit financial flows through its programs on anti-money laundering, combating the financing of terrorism, and tax integrity.

OAI comprises the Office of the Head, the Investigations Division, and the Prevention and Compliance Division. In 2022, OAI comprised 49 staff: 1 head, 2 directors, 1 advisor, 17 international staff, 22 national staff, and 6 administrative staff. OAI hosted three interns and engaged expert consultants, contractors, and external investigation and audit firms to support its operations.

This publication presents OAI’s accomplishments in 2022.
Renewing Integrity Risk Management after the Pandemic

After a difficult start to 2022, restrictions from the coronavirus disease (COVID-19) pandemic finally eased. All personnel of the Office of Anticorruption and Integrity (OAI) resumed their work in headquarters from September onward, along with the rest of the Asian Development Bank (ADB). While the office amply demonstrated its ability to function effectively while working remotely, the reopening offered an opportunity to reconnect and to reinvigorate our efforts.

ADB has identified international tax cooperation as a key priority for developing member countries (DMCs) seeking to strengthen domestic resource mobilization and get back on track toward achievement of their Sustainable Development Goals. Now in its second year, the Asia Pacific Tax Hub continues to assist DMCs implement international tax transparency and integrity standards.

Trust in OAI’s investigative function depends on its ability to assess and investigate complaints objectively, independently, and expeditiously. In 2022, OAI received 194 new complaints and had 59 complaints under assessment from 2021. Capitalizing on a dedicated team and robust protocols developed in previous years, OAI reviewed 218 complaints during the year and had a record low of 35 complaints under active assessment at year-end. OAI closed 66 external investigations, making meaningful progress in resolving aging cases, with 44 of these received between 2018 and 2020. Of these, 33 cases resulted in debarments for 261 firms and 20 individuals; and 24 cases resulted in reprimands for 26 firms and 17 individuals and cautions for 7 firms and 1 individual. OAI closed six investigations related to alleged misconduct by ADB staff, with five cases referred for disciplinary or nondisciplinary action.

OAI must now continue its efforts to reduce the number of open investigations and introduced new methods in 2022 to achieve this while maintaining its usual high standards. When conducting investigations, OAI requires cooperation from entities and individuals under investigation to establish the facts of the case. In the past year, OAI pioneered the use of show cause letters that provide the subject/s of investigation an opportunity to explain or provide further information in relation to an investigation. Cooperation can be a mitigating factor when determining potential remedial action and typically leads to quicker resolution of an investigation. Also, over the past year, OAI resolved more matters using “conditional non-debarments,” which allow deserving entities to avoid debarment if they comply with agreed conditions. Noncompliance with these conditions will result in debarment of the entities. A conditional non-debarment encourages the subject/s of investigation to improve their integrity-related strategies and internal controls while maintaining the deterrent effect of a debarment.

Through the Asia Pacific Tax Hub and other initiatives, ADB stands ready to work with our developing member countries to help ensure strong domestic revenue streams. This will support our region to get back on a path to strong and lasting growth.

ADB President Masatsugu Asakawa
OAI’s collaborative efforts with the investigation and integrity offices of the other multilateral development banks (MDBs) resulted in the MDB agreeing to the *MDB General Principles for Business Integrity Programmes*. These principles represent the fundamental integrity standards that MDB contractual counterparties should follow. Accordingly, ADB now requires entities it has debarred to satisfactorily implement these standards before their eligibility to participate in ADB-financed, -administered, or -supported activities is reinstated. To establish that these required standards have been satisfactorily achieved, OAI requires independent verification from external monitors to be submitted for reinstatement requests.

In 2023, ADB anticipates the introduction of its Investigations and Enforcement Framework (IEF) to replace its Integrity Principles and Guidelines. The IEF will seek to strengthen the independence of ADB’s sanction process by having ADB’s first-tier sanctions body—the Integrity Oversight Committee (IOC)—and ADB’s second-tier sanctions body—the Sanction Appeals Committee (SAC)—comprise a majority of external members. The IEF will also expand on the checks and balances within the sanctioning process by increasing the scope of appeals that can be made from an initial decision and by having all sanctions reviewed and endorsed by the Chair of the IOC before they are implemented.

Legal, fiduciary, operational, and reputational risks arising from national sanctions increased in the wake of the Russian invasion of Ukraine. OAI led the development and implementation of a sanctions control framework that bolsters the bank’s internal controls to identify and manage these risks. The controls also strengthen ADB’s ability to prevent parties that are under ADB or United Nations Security Council sanctions from participating in ADB-financed operations. In 2022, OAI assessed and analyzed 1,644 cases with sanctions risk indicators.

OAI views awareness-raising and capacity building for ADB staff and developing member country entities as cornerstones of effective integrity risk management in ADB-related activities. In 2022, OAI reached over 10,000 participants via 124 learning events on fraud and corruption detection and prevention, and on combating illicit financial flows from money laundering, terrorism financing, and tax evasion and other illicit activities. These capacity building activities also support ADB’s operational priority on strengthening governance and institutional capacity under its long-term strategy, Strategy 2030.


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To change the world for the better, it is important that we balance our punitive tools—such as debarments—with the need to achieve positive and lasting change in our developing member countries.

OAI Head, John Versantvoort

To facilitate the introduction of the IEF, ADB established the Advisory Committee on Investigations and Enforcement Matters (Advisory Committee). Composed of five members, including the Deputy General Counsel serving as Chair, the Advisory Committee’s main role is to advise the President on the appointment of the IOC and SAC members.

OAI continued to conduct integrity risk management prevention and mitigation in 2022 by undertaking integrity due diligence on over 3,500 subjects and proactive integrity reviews, while advising key project stakeholders on integrity risks and mitigation measures.

To change the world for the better, it is important that we balance our punitive tools—such as debarments—with the need to achieve positive and lasting change in our developing member countries.
Investigating Integrity Violations and Staff Misconduct

OAI investigations help safeguard development funds and prevent integrity problems from recurring.

OAI serves as the initial point of contact for all allegations of integrity violations in projects and other activities of ADB. Integrity violations are defined in ADB’s Anticorruption Policy (1998, as amended to date) and the Integrity Principles and Guidelines (2015, as amended from time to time). Appendix 1 outlines the processes for complaints assessment, external investigations, and internal investigations.

Complaints Assessment
OAI screens complaints to ensure they relate to an integrity violation and involve ADB-related activities. OAI considers whether the complaints are

- within OAI’s mandate—relate to activities that OAI is authorized to investigate;
- credible—there is a reasonable possibility that a violation has occurred;
- verifiable—practicable options exist to obtain sufficient evidence to determine the truth of the allegations on the balance of probabilities; and
- material—the matter is of sufficient importance to justify the projected requirements of the investigation and any remedial action.

As a rule, complaints that meet all four criteria are converted into full investigations. Otherwise, the complaint is closed.

In 2022, OAI received 194 new complaints of alleged integrity violations on ADB projects or by ADB staff, 24% lower than the number of complaints received in 2021.

The 194 new complaints were reported by external parties (110) such as competing bidders or executing agencies, ADB staff (52), and anonymous complainants (32). Most complaints pertained to allegations of fraudulent practice, corruption, and collusion as set out in Figure 1. There was a 54% year-on-year reduction in allegations involving ADB staff, which OAI attributes to continued remote working, reduced mission travel, and the effectiveness of the 2020 update to ADB’s institutional framework for addressing workplace concerns, which also saw the establishment of ADB’s Office of Professional Ethics and Conduct.

At the beginning of the year, 59 complaints remained under review from the previous year. In 2022, OAI received 194 new complaints, resulting in 253 complaints being assessed in the year. Of these, 195 complaints were either converted for further investigation or closed.

Figure 1: Types of Complaints, 2022

Note: The category “Others” refers to other integrity violations under the Integrity Principles and Guidelines (2015) such as obstruction; complaints of other misconduct such as bullying, harassment, and abuse of authority; and complaints that are not integrity concerns.

Source: Office of Anticorruption and Integrity, ADB.
comprising all the 2021 complaints and 71% of those opened in 2022. A total of 62 complaints were assessed as requiring further investigation (58 external matters and 4 internal matters), and 133 complaints were closed because they did not warrant further investigation. Over the last 5 years, as a result of improved efficiency of case assessment, OAI has significantly reduced the number of open cases carried forward each year. The average time taken to assess a complaint in 2022 was 43 working days, slightly higher than 41 working days in 2021 (Figure 2).

Of the 133 complaints closed, 114 did not meet one or more of the prescribed assessment criteria. OAI issued a caution in 4 cases, a reprimand in 4 cases, and determined that sufficient other actions had been taken in 11 other cases, e.g., action taken by the subject of an allegation, by other ADB departments or executing agencies, or by the complainant (such as withdrawal of the complaint) (Figure 3).

After assessment, OAI considered 76 complaints not credible because the information provided as part of the allegations was found to be inaccurate. There were 14 complaints that were not verifiable as they lacked sufficient information or details to establish the veracity of the allegations. A total of 21 complaints were closed as the allegations were determined to be outside OAI’s mandate, while 3 complaints were assessed as not material. Examples of complaints closed by OAI in 2022 are presented in Appendix 2.

At year-end, 58 complaints remained open, of which 23 complaints were at the review stage. This leaves 35 active complaints assessments at year-end; OAI’s lowest number of active cases carried forward to date.
External Investigations

OAI considers an investigation external if the subject of investigation is not an ADB staff or another person covered under ADB’s Code of Conduct. External investigations are conducted in accordance with ADB’s Integrity Principles and Guidelines.

In 2022, 58 new cases against external parties were assessed by OAI as warranting further investigation. These cases pertained to alleged fraudulent practice, collusion, and corruption (Figure 4).

At the beginning of the year, OAI had 170 external investigations remaining open from previous years. It commenced 58 new investigations and closed 66 investigations. Of the closed investigations, 57 resulted in remedial action, with debarments imposed in 33 investigations, and cautions and reprimands issued in 24. OAI closed an investigation after determining that the firm involved, at the time of debarment, was no longer affiliated to the cross-debarred entity. Another investigation was closed as OAI was unable to identify the existence of entities alleged to have engaged in fraudulent practice. Seven investigations were also closed without remedial action as they were unsubstantiated or disproven. Figure 5 details these closed investigations.

At year-end, 162 external investigations remained open, including 7 investigations within their appeal period that require no further action. These open investigations also include 29 cases for which investigations have been concluded and the proposed remedial action is under review.
Remedial Actions

The 33 external investigations where remedial action was imposed resulted in debarment of 261 firms and 20 individuals (Table 1). The majority resulted from the acceptance of debarment conditions proposed by OAI. The remainder resulted from a decision of the Integrity Oversight Committee (IOC).

In three separate investigations, three firms and one individual accepted OAI’s proposed conditional non-debarment. A conditional non-debarment is imposed if the investigation determines that debarment is not required provided that specific actions are taken by a party within an agreed-upon time frame. In appropriate circumstances, this provides the firm with the opportunity to proactively improve their integrity-related strategies, internal controls, and implement remediation measures.

Examples of significant investigations completed by OAI during the period included:

(i) The IOC agreed with OAI’s findings that a representative of a firm engaged in corrupt practice by bribing an executing agency official in the Kyrgyz Republic to ensure the award of an ADB-financed contract. The IOC also agreed with OAI’s recommendation to debar the representative of the firm as an individual for 5 years and the firm for 7 years from participating in any activities financed, administered, or supported by ADB.

(ii) The IOC debarred a firm for multiple fraudulent practices in two ADB projects in Pakistan and Papua New Guinea. Following an OAI investigation, the IOC determined that the firm engaged in fraudulent practices by submitting altered curricula vitae of key experts without their consent in one bid, and misrepresenting that it had not paid fees to an agent in another bid. The IOC debarred the firm for 4 years, effective from the date of its temporary suspension on 31 May 2022.

(iii) A firm accepted OAI’s proposed debarment of 4 years with conditional reinstatement following a finding that it had engaged in multiple fraudulent practices in two projects in Bangladesh and Pakistan. While the firm’s actions were aggravated by the harm caused to ADB-related activities and a lack of oversight, OAI considered the firm’s degree of cooperation with OAI and steps taken to address the concerns as a mitigating circumstance.

Table 1: Remedial Actions for External Parties, 2022

<table>
<thead>
<tr>
<th>Remedial Action</th>
<th>Firms</th>
<th>Individuals</th>
<th>Total</th>
</tr>
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<tbody>
<tr>
<td>Debarred</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Accepted</td>
<td>242a</td>
<td>6</td>
<td>248</td>
</tr>
<tr>
<td>Integrity Oversight Committee (IOC) – imposed</td>
<td>15b</td>
<td>9</td>
<td>24</td>
</tr>
<tr>
<td>Sanctions Appeal Committee – sanctions maintained</td>
<td>4</td>
<td>5</td>
<td>9</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>261</td>
<td>20</td>
<td>281</td>
</tr>
<tr>
<td>Temporarily suspended</td>
<td>1</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Reprimanded</td>
<td>26</td>
<td>17</td>
<td>43</td>
</tr>
<tr>
<td>Cautioned</td>
<td>7</td>
<td>1</td>
<td>8</td>
</tr>
<tr>
<td>Cross debarred</td>
<td>199</td>
<td>19</td>
<td>218</td>
</tr>
</tbody>
</table>

a This includes 225 branches, subsidiaries, or affiliates who were debarred to avoid the circumvention of the sanction by their parent.
b This includes four branches, subsidiaries, or affiliates who were debarred to avoid the circumvention of the sanction by their parent.

Source: Office of Anticorruption and Integrity, ADB.

2 ADB’s Published Sanctions List is available online. This list is a subset of ADB’s Complete Sanction List. It contains the names of debarred entities and individuals who are uncontactable, have been cross debarred by ADB because of a debarment by another MDB, or have engaged in a second or subsequent integrity violation.

3 The IOC, an independent committee at ADB, determines the appropriate sanctions and other remedial actions for integrity violations. The IOC has three members, two internal and one external. Other remedial actions consist of reprimands, restitution and/or remedy, and cautions. ADB. 2015. Integrity Principles and Guidelines. Manila. para. 86.

4 One of these investigations remained open at the end of 2022.
(iv) A firm entered conditional non-debarment with OAI following a finding that it had engaged in multiple fraudulent practices in a project in Nepal. The company self-identified these integrity violations and reported them to OAI. Thereafter, it agreed to a conditional non-debarment including conditions that the firm demonstrate that it has initiated a risk-based fraud and corruption prevention strategy.

(v) A firm and its representative accepted OAI’s findings that they engaged in fraudulent practice by submitting false work experience documents to qualify for the work experience requirements in a bid for an ADB-financed contract in Pakistan and agreed to OAI’s proposed debarment for a period of 4 years.

(vi) The IOC debarred a firm and its representative for 3 years for engaging in a corrupt practice in an ADB project in Mongolia. The IOC found that the firm and its representative had paid a bribe to personnel from the implementing agency to improperly influence the implementing agency not to terminate its ADB-financed contract.

(vii) The IOC debarred a firm for 6 years for the fraudulent practice of submitting false work experience documents in its bid for an ADB-financed project in Mongolia. In imposing a 6-year debarment, the IOC considered the harm caused to the project and the firm’s failure to respond to OAI’s request for information.

(viii) The IOC debarred indefinitely an individual and three firms for their repeated submission of fraudulent documents that misrepresented their work experience and corporate profile and included fabricated audit reports in connection with 27 bids for ADB-financed contracts in Cambodia. The permanent debarment was a consequence of the firms’ and individual’s repeated integrity violations spanning several years and ADB-financed contracts. Due to the exceptional nature of the fraudulent conduct, the IOC further determined that the debarment decisions should be published.5

(ix) A firm and its former employee accepted OAI’s findings that they engaged in fraudulent practice by falsifying the test reports for critical equipment needed to undertake an ADB-financed contract in an ADB member country. The firm and its former employee agreed to OAI’s proposed sanction of 4 years with an option for early reinstatement after completion of a minimum period of 3 years, if they can demonstrate compliance with the conditions set by OAI.

(x) A firm accepted OAI’s proposed debarment of 3 years with an option for early reinstatement after completion of a minimum period of 2 years following a finding that it had violated its previous sanction and engaged in misrepresentation when it submitted a bid for an ADB-financed contract in the People’s Republic of China. As this was a second integrity violation by the firm, the debarment was posted on ADB’s public website.6

Appendix 3 provides further examples of external investigations and remedial actions undertaken in 2022.

Temporary Suspension
In 2022, the IOC suspended the eligibility of two firms to be awarded ADB-financed contracts in two different cases pending completion of OAI’s investigation. In the first matter, a firm was suspended for a total period of 360 days.7 In the second, a firm was suspended for 180 days. Both investigations have now been completed with both firms subsequently debarred.

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5 Asian Technical Assistance Co., Ltd.; Branch of Canada Construction Cooperation Limited; Branch of Royal Road Limited; Pyramid E&C Co. Ltd. (formerly PMA Property Management Agent Co., Ltd.); and KimChhean Yim. ADB. Anticorruption and Integrity. Published List.

6 China National Heavy Machinery Corporation (CHMC). ADB. Anticorruption and Integrity. Published List.

7 The initial period was for 180 days, extended for another 180 days.
Appeals
In 2022, three firms and two individuals lodged appeals against the IOC’s debarment decisions in three separate cases. A further appeal received in 2021 and involving a firm and individual was assessed in 2022. The appeals in all four cases were not referred to the SAC as they failed to meet the requirements for SAC consideration.8

Reinstatement of Debarred Parties
After assessing applications for reinstatement, ADB reinstated 13 firms and 5 individuals.9 OAI also removed 172 firms and 29 individuals debarred by other MDBs from ADB’s sanctions list following their reinstatement by the respective MDBs.

Cross Debarments
ADB submitted for cross debarment 10 firms and 4 individuals that ADB debarred. Based on other MDBs’ notices of debarment, ADB cross debarred 195 firms and 15 individuals. This is pursuant to the Agreement for Mutual Enforcement of Debarment Decisions (Cross Debarment Agreement) and in line with sanctions imposed by the other MDBs participating in the agreement.10

Whistleblower Protection in Office of Anticorruption and Integrity Investigations
Administrative Order 2.10: Whistleblower and Witness Protection, which was amended in 2021, protects, to the extent possible, the identities of whistleblowers and witnesses acting in good faith to ensure they are not subjected to retaliation. Whistleblowers may remain anonymous or request confidentiality.

In 2022, OAI received three complaints from whistleblowers requesting protection or confidentiality. These cases did not result in any findings of retaliation.

OAI also issued a report to a complainant staff who alleged he had been retaliated against due to his role as a whistleblower.

Internal Investigations
OAI is responsible for investigating allegations of ADB staff misconduct. Misconduct, as defined in ADB’s Administrative Order 2.02, Code of Conduct, includes the failure of ADB staff to observe Staff Regulations, ADB’s Administrative Orders, the Code of Conduct, or other duties of employment.

On 1 January 2022, eight investigations into ADB staff misconduct were ongoing—four pertaining to integrity violations and four pertaining to other misconduct. During the year, OAI opened one new investigation into an alleged integrity violation and three into other misconduct.

OAI closed six investigation cases into ADB staff. In one case, OAI found insufficient evidence to substantiate the allegations. In the other five cases, OAI found that staff had engaged in integrity violations and/or other misconduct.

In 2022, OAI submitted five investigation reports to the Budget, People, and Management Systems Department (BPMSD), covering six internal investigation cases involving five staff. OAI also issued one remedial report to a complainant staff who alleged that they had been retaliated against due to their role as whistleblower. The type of findings of an integrity violation and other misconduct in these five cases are set out in Figure 6.

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9 Includes seven subsidiaries, branches, and affiliates.
10 The MDBs are African Development Bank, European Bank for Reconstruction and Development, Inter-American Development Bank, and World Bank. Read more details about the Cross Debarment Agreement.
In every case, OAI ensured full due process, enabling the subject staff to meaningfully respond to the findings prior to arriving at its conclusion. Where possible, OAI submitted its investigation reports to BPMSD or closed the investigation within 12 months of OAI notifying the staff that they were under investigation.

In 2022, BPMSD imposed disciplinary action in eight internal investigations for one investigation report submitted in 2022 and in seven cases for reports submitted in 2020 and 2021. Disciplinary measures imposed included dismissal, suspension without salary for a prescribed period, salary reduction for a prescribed period, no access to ADB information technology (IT) systems and ADB premises while on suspension, ineligibility for promotion for a prescribed period, and/or permanent ineligibility to be engaged using ADB funds.

At year-end, OAI had six open internal investigations.

During 2022, OAI substantively supported an ADB cross-sectional team to address sexual exploitation, abuse, and harassment matters under an ADB-financed project and supported ADB’s efforts in preparing guidance to address these risks proactively and reactively in ADB-financed projects. OAI also participated in ADB’s efforts to communicate its stance on domestic violence. OAI continues to liaise closely with ADB’s Office of Professional Ethics and Conduct regarding allegations of staff misconduct, and similarly with BPMSD and ADB’s Office of the General Counsel, as appropriate.

Examples of Internal Investigations Cases with Disciplinary Actions in 2022

The following are representative summaries of internal investigations cases completed in 2020, 2021, and 2022, with disciplinary actions imposed in 2022.

(i) Seven staff members were found to have transmitted inappropriate media using ADB IT resources.

Action: A combination of disciplinary measures was imposed against the seven staff, including dismissal, suspension without salary for a prescribed period, salary reduction for a prescribed period, no access to ADB IT systems and ADB premises while on suspension, ineligibility for promotion for a prescribed period, and permanent ineligibility to be engaged using ADB funds.

(ii) A staff member engaged in misconduct by disclosing confidential information to an unauthorized individual while in a conflict-of-interest situation.

Action: The staff was suspended without salary for a prescribed period, with no access to ADB IT systems and ADB premises while on suspension, and ineligibility for promotion for a prescribed period.

Source: Office of Anticorruption and Integrity, ADB.
Prevention and Compliance

Integrity Due Diligence
OAI conducts due diligence on ADB’s projects, provides advisory support to other departments in areas of integrity including anti-money laundering and combating the financing of terrorism (AML/CFT), bribery and corruption, tax integrity, and reputational risk. OAI continues to work across ADB to ensure that integrity risks are detected, mitigated, and disclosed as appropriate.

The volume of integrity due diligence and complexity of projects with heightened risk factors reflected the emergence of new risk factors like sanctions in the wake of the Russian invasion of Ukraine as well as an upturn in economic activity as the impact of the global coronavirus disease (COVID-19) pandemic eased and supply chains opened.

In 2022, OAI reviewed 1,159 entities for integrity due diligence, which increased from 2021. Of these, 757 (65%) were entities involved in transactions under ADB’s nonsovereign and sovereign operations, while the remaining 402 (35%) involved reviews on vendors, guest speakers to ADB’s events, counterparties for partnership or affiliation, counterparties of the Treasury Department, and so on (Figure 7).

Sanctions Risk Management
ADB adopted an Approach Paper on Sanctions Management in ADB Operations, which sets forth the internal sanctions control framework to strengthen the identification, assessment, and management of legal, fiduciary, and operational risks arising from national sanctions regimes. The framework also strengthens ADB’s ability to prevent parties that are under ADB or United Nations Security Council sanctions from participating in ADB-financed operations.

As part of these controls, OAI assessed and analyzed 1,644 cases with sanctions risk indicators. Most of these cases could be resolved through enhanced due diligence and risk mitigation measures. A total of 22 cases were referred to OAI’s investigations division for a potential breach of existing ADB sanction conditions. Such a breach may constitute an integrity violation and may lead to additional remedial action such as an extension of the minimum debarment period.

The Russian invasion of Ukraine led to increasing waves of sanctions on individuals, corporations, sectors, and products with a real or potential Russian nexus. These sanctions, while not materially impacting ADB’s general business activity, resulted in closer scrutiny of integrity risks posed to ADB operations and heightened risk monitoring activity. Major counterparts and
stakeholders are increasingly scrutinized by ADB and may be required to implement appropriate arrangements to avoid or minimize the operational, legal, fiduciary, and reputational risk to ADB operations.

**Pre-Employment Screening**
OAI conducted pre-employment screening on 399 individuals in 2022, an increase of 14% compared to 2021. The increase is attributed to the continued post-pandemic easing of travel restrictions and increased relocation opportunities.

**Know-Your-Customer Requests**
In an environment of increasing focus in analyzing counterparty risk, ADB itself is also the subject of due diligence from counterparties, notably financial institutions. OAI responded to 114 “know your customer” requests including due diligence calls, an 8% increase from 2021. OAI saw an increase in the depth and breadth of information sought, reflecting the continued importance that ADB’s counterparties are placing on generally heightened standards.

**Proactive Integrity Reviews**
OAI conducts proactive integrity reviews (PIRs), special PIRs, and follow-up reviews on selected ongoing ADB-financed or -administered sovereign projects to assess integrity risks related to the controls in place for financial management, procurement, asset management, and institutional capacity (Appendix 4 details the PIR process flow). OAI continued to conduct special PIRs, follow-ups, and internal reviews in 2022, mostly through virtual methods utilizing in-country resources where possible. OAI resumed on-site assessments once pandemic protocols eased. Appendix 5 has the key results of integrity-related reviews completed in 2022.

OAI completed an internal review relating to specific elements of ADB sanctions control for 37 active sovereign projects and internally issued three reports outlining findings and recommendations. The review highlighted that specific executing and implementing agencies had insufficient awareness of several ADB sanctions control requirements, such as the requirement to access ADB’s complete sanctions list and the need to check entities against it at certain milestones throughout a project’s life cycle.

OAI published its follow-up review report on the Tuvalu water-transport project, *Outer Island Maritime Infrastructure Project: Follow-Up Review of Proactive Integrity Review Recommendations*. OAI independently assessed the implementation of recommendations relating to four PIR findings, with the assessment concluding that the executing agency implemented adequate controls to mitigate integrity risks relating to incorrect payments and enhancement of payment request controls, contract award to unqualified bidders, inadequacy of project supporting documents, and enhancing the bid evaluation financial management.

**Integrity Risk Management Reviews of Projects**
OAI provides integrity risk advice on ADB-financed or -administered sovereign projects during various stages of the project life cycle, including conceptualization, design, and implementation.

Upon the request of regional and other departments, OAI reviewed and provided integrity risk advice for 217 preapproval packages that included concept papers, technical assistance reports, memos in change in scope and/or implementation arrangements, and reports and recommendations of the President to the Board of Directors, among others. OAI also reviewed 42 completion reports and 11 other documents, including policy papers.

OAI provided support to ADB’s regional departments in assessing corruption risks and developing mitigation measures for governance risk assessments prepared as part of the country partnership strategies for India, Kazakhstan, the Kyrgyz Republic, and the Lao People’s Democratic Republic (Lao PDR).
Asia Pacific Vaccine Access Facility Projects
OAI continued to provide integrated assistance on Asia Pacific Vaccine Access Facility (APVAX) projects. Specifically, OAI supported four APVAX projects in Bangladesh, Bhutan, Maldives, and Tajikistan, providing guidance to ADB’s respective project teams to undertake integrity-related due diligence, identify integrity risks and controls, recommend mitigation measures, and include anticorruption and integrity clauses in contractual obligations. The number of APVAX projects, which were a critical priority during 2021, has naturally reduced year on year as the demand for support reduced from the peak of the pandemic.

Other Integrity Risk Advisories
In support of ADB operations in 2022, OAI handled 787 integrity advisories, covering cofinancing and partnership agreements, conflicts of interest in operations and institutional contracts, contract variations for debarred and temporarily suspended entities, and standard and project-specific bidding documents.

Throughout the year, OAI worked closely with the Office of the General Counsel and operations departments in key discussions with various United Nations agencies on anticorruption and integrity clauses to ensure compliance with ADB’s investigative mandate and internal controls framework. ADB finalized several project-specific agreements, and work continued in finding mutually agreed and workable solutions to address issues identified during negotiations.
Knowledge Sharing and Collaboration

In 2022, OAI continued its role in promoting ADB as a thought leader and role model of integrity risk management in development banking through its outreach work.

OAI creates and shares knowledge products and services that help identify and manage integrity risks for both internal and external stakeholders, including ADB staff and personnel, DMC government executing and implementing agencies, and other partner institutions.

Knowledge Products

In 2022, OAI published 15 videos, including eight from its newly launched iACT iTalk Shorts series delivering bite-sized insights from integrity experts, the International Anticorruption Day 2022 joint MDB message, two videos for the 2021 OAI Annual Report (a full video and teaser video), and two each for its continuing video series, iACT iTalk and Integrity by the Numbers.

iACT iTalk video series. iACT iTalk features anticorruption and integrity thought leaders who offer actionable solutions to fighting corruption, fraud, and other governance-related issues. OAI produced two videos in 2022, with one on the impacts of development bank sanctions and another highlighting sanctions management in ADB operations for internal stakeholders. Moreover, OAI produced eight episodes of iACT iTalk Shorts, featuring insights from anticorruption and integrity champions.

Integrity by the Numbers video series. OAI produced two videos covering July–December 2021 and January–June 2022, showing how OAI continues to investigate allegations of integrity violations in the wake of the COVID-19 pandemic.

OAI also released the guide Frequently Asked Questions on ADB Sanctions in 12 languages.
**Knowledge-Sharing Events**

OAI conducted 124 knowledge-sharing sessions in 2022, a 36% increase from 2021, and for the second consecutive year reached over 10,000 participants, including DMC representatives and ADB personnel (Table 2). These sessions comprised of 121 online and hybrid synchronous sessions and 3 e-learning courses.

These sessions included awareness-raising briefings, workshops, and e-learning courses on ADB’s Anticorruption Policy, integrity due diligence, anticorruption and integrity, fraud detection and prevention in ADB projects, AML/CFT, and tax transparency.

OAI’s three e-learning courses, Anticorruption and Integrity at ADB, which is mandatory for ADB staff to complete, Combating Money Laundering and Terrorist Financing, and the bank’s first gamified e-learning course—Are You an Integrity Champion?—continued to run for both ADB and external learners.

**Table 2: Learning Sessions and Participants, 2022**

<table>
<thead>
<tr>
<th>Activity</th>
<th>DMC Development Partners</th>
<th>ADB Personnel</th>
<th>Both DMC and ADB</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sessions conducted</td>
<td>88</td>
<td>33</td>
<td>3</td>
<td>124</td>
</tr>
<tr>
<td>Participants reached</td>
<td>8,553</td>
<td>1,586</td>
<td>359</td>
<td>10,498</td>
</tr>
</tbody>
</table>

ADB = Asian Development Bank, DMC = developing member country.

Source: Office of Anticorruption and Integrity, ADB.

**International Anticorruption Day**

On 9 December 2022, ADB celebrated International Anticorruption Day in a hybrid event at headquarters. With keynote speeches and discussions among integrity experts from three ADB member countries, the celebration raised awareness on how integrity, transparency, and trust are building blocks to facilitate recovery and rebuilding in the Asia and Pacific region in the post-pandemic environment; and emphasized the significance of individual roles in ensuring integrity in ADB projects and activities.

**Marking International Anticorruption Day.** President Masatsugu Asakawa (top left) emphasized that ADB must have zero tolerance for corruption and be transformational by learning from the integrity challenges encountered in ADB projects. The cornerstone event included key sessions from two of the US State Department’s 2021 Anticorruption Champions—ProTenge.KZ Founder Jamilya Maricheva (top middle) and Anti-Corruption Organization of Thailand Executive Committee Member Torplus Yomnak (top right)—and from former Undersecretary General for UN Internal Oversight Services Heidi Mendoza (bottom left). They shared insights and experiences on how to foster trust in post-pandemic rebuilding. The event was moderated by the director of OAI’s Prevention and Compliance Division, Lisa Kelaart-Courtney (bottom right). (Photos by Edsel Roman and graphics by Ryan Dael.)

**Building Through Integrity Training**

Nearly 2,600 participants with oversight involvement in ADB-financed projects attended 15 virtual sessions specifically tailored for executing and implementing agencies and project management units to increase awareness and understanding of ADB’s anticorruption and integrity framework, due diligence, detection of red flags, and integrity violations.

Appendix 6 lists the knowledge products and services produced by OAI in 2022.
Anti-Money Laundering and Combating the Financing of Terrorism

OAI actively implemented the regional technical assistance on AML/CFT for DMCs by developing guidelines/manuals, risk assessment methodology and tools, providing policy advice, conducting capacity building activities, and assisting on preparations for country evaluations against international standards in the Kyrgyz Republic, the Lao PDR, Nepal, Tajikistan, and Thailand. These include the following guidance documents and corresponding capacity building activities:

(i) **Methodological Guidance on Conducting Sectoral Money Laundering/Terrorism Financing Risk Assessment for the Banking Sector and Payment Service Providers** for the Financial Intelligence Unit of the Kyrgyz Republic;

(ii) **Guidelines on Financial Investigations of Money Laundering and Confiscation by Law Enforcement** for the Department of Anti-Money Laundering Investigation of Nepal;

(iii) **Handbook on the AML/CFT/Countering Proliferation Financing (CPF) Inspection Manual, User Guide on AML/CFT/CPF Risk Assessment for Reporting Entities, and User Guide on AML/CFT/CPF Risk Assessment for Supervisory Bodies** for the National Bank of Tajikistan; and

(iv) Implementing guideline to the draft Beneficial Ownership Registration Act, for the Anti-Money Laundering Office of Thailand.

Enhancing Tax Transparency and Integrity

In 2022, OAI expanded its tax integrity technical assistance support to 21 DMCs in Asia and the Pacific. Under the auspices of the Asia Pacific Tax Hub launched in May 2021, OAI continued to provide virtual and in-person technical assistance support to guide selected DMCs in drafting their laws, regulations, and processes to implement international tax transparency and integrity standards. In coordination with key development partners, OAI co-hosted four tax policy dialogues and participated in eight other events hosted by development partners to raise awareness on ADB’s tax integrity initiatives during 2022.

Together with the Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum), OAI conducted two mock on-site reviews to support the efforts of Mongolia and Thailand in preparation for their Global Forum peer reviews. OAI supported efforts of Armenia, Maldives, Mongolia, Papua New Guinea, and Vanuatu in improving the information security framework to receive and maintain treaty-protected data. OAI also conducted experience-sharing workshops on effective compliance regimes related to automatic exchange of financial account information for Pakistan and Viet Nam.

OAI supported the Philippines and Samoa in enhancing their administrative and domestic rules in resolving treaty-related disputes. Furthermore, OAI delivered capacity building workshops on transfer pricing to Azerbaijan, the Kyrgyz Republic, Pakistan, and Samoa. OAI also engaged with Fiji, Tajikistan, and Viet Nam in delivering trainings relating to the Base Erosion and Profit Shifting minimum standards. OAI hosted the first in-person meeting of the International Tax Pacific Initiative launched in October 2020, with more than 50 senior officials from 13 Pacific DMCs, to discuss the two-pillar solution to address the challenges arising from the taxation of the digital economy endorsed by the Group of Twenty (G20). OAI also provided support on this topic to Armenia, Indonesia, Maldives, Pakistan, Thailand, and Viet Nam.

OAI further contributed to 13 in-country and 12 regional in-person and virtual capacity building events, in collaboration with development partners including the Global Forum and Organisation for Economic Co-operation and Development, benefiting over 3,800 tax officials.

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11 Armenia, Azerbaijan, Cambodia, Cook Islands, Federated States of Micronesia, Fiji, Georgia, Indonesia, Kyrgyz Republic, Maldives, Marshall Islands, Mongolia, Pakistan, Palau, Papua New Guinea, Philippines, Samoa, Tajikistan, Thailand, Vanuatu, and Viet Nam (DMCs added in 2022 are in **bold**).

12 OAI resumed in-person missions following the easing of regional travel restrictions in July 2022.

Regional Consultation on International Tax Matters for Asia and the Pacific held 5–6 December 2022 at ADB Headquarters. This hybrid event brought together over 230 senior tax officials from 47 jurisdictions, including 40 DMCs and 7 regional and international organizations, to discuss challenges surrounding taxation of the digitalized economy (photo by ADB).
Acknowledgments

Appendix 1: Complaints and Investigations in ADB

The Office of Anticorruption and Integrity (OAI) registers complaints independently and objectively assesses allegations and investigates these if warranted. If an alleged integrity violation meets the complaints assessment criteria, OAI converts the complaint into an investigation. If it does not meet the criteria, OAI closes the complaint and may refer it to another Asian Development Bank (ADB) department. OAI may also close the complaint if remedial action was taken or for other relevant considerations (Figure A1.1).

If an external investigation finds that an integrity violation has occurred, OAI presents its findings to the subject of investigation for response or agreement to the proposed sanctions. If the subject of investigation agrees with OAI’s findings and, if applicable, the proposed sanction, the case is closed. If the findings or the proposed sanctions are disputed, OAI submits the case to the Integrity Oversight Committee for review and to determine the appropriate remedial actions (Figure A1.2).

If an internal investigation finds that a staff member has engaged in misconduct, OAI presents its findings to the staff member for response. If the response does not alter OAI’s finding of misconduct, OAI submits a report to the Budget, People, and Management Systems Department to determine whether disciplinary or non-disciplinary action is warranted against the staff member. Where there is no finding of misconduct, the case is closed (Figure A1.3).

ADB = Asian Development Bank, OAI = Office of Anticorruption and Integrity.
Note: This flowchart is not intended to, and does not replace, modify, supersede, or amend, ADB’s Integrity Principles and Guidelines (2015) AO 2.02 (2022), AO 2.04 (2020), and AO 2.10 (2021).

* OAI may also close the case if there are other relevant considerations to do so, e.g., whether the matter may be effectively addressed through other options available to ADB.

Source: Office of Anticorruption and Integrity, ADB.
Figure A1.2: Process of External Investigations

1. OAI investigates the allegation.
   - Caution
   - Reprimand

2. Is there a finding?
   - Y: OAI presents its investigative findings to subjects of interest.
   - N: Investigation closed

3. Subject of interest accepts OAI's findings?
   - Y: OAI proposes a sanction.
     - Accepted?
       - Y: Investigation closed
       - N: OAI refers its investigative findings to IOC.
     - N: No sanction → Investigation closed

4. Sanction is subject to appeal before the Sanction Appeals Committee.
   - Sanction lifted or reduced
   - Sanction upheld
   - Returned to OAI for reinvestigation
   - Investigation closed

Figure A1.3: Process of Internal Investigations

1. OAI investigates the allegation.
   - Investigation closed

2. Is there a finding?
   - Y: OAI reports its investigative findings to BPMSD for consideration of any appropriate action.
   - N: Investigation closed

3. In consultation with OGC, BPMSD reviews OAI's report and takes measures in accordance with AO 2.04: Disciplinary Measures and Procedures.

4. Decision is subject to administrative review and appeal.

AO = administrative order; BPMSD = Budget, People, and Management Systems Department; OAI = Office of Anticorruption and Integrity; OGC = Office of the General Counsel.

Note: This flowchart is not intended to, and does not replace, modify, supersede, or amend, ADB’s Integrity Principles and Guidelines (2015), AO 2.02 (2022), AO 2.04 (2020), and AO 2.10 (2021).

a This includes investigations of allegations referred to OAI by the Office of Professional Ethics and Conduct.

b If staff initiates an administrative review of BPMSD’s decision, the review and appeal will be in accordance with AO 2.06 (2020).

Source: Office of Anticorruption and Integrity, ADB.
## Appendix 2: Examples of Office of Anticorruption and Integrity Complaints Closed in 2022

<table>
<thead>
<tr>
<th>Disposition and Summary</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Not Credible</strong></td>
<td></td>
</tr>
<tr>
<td>An anonymous complaint alleged collusive practice in an executing agency-administered technical assistance project, where the executing agency project director allegedly lobbied for a favored bidder to win a contract ahead of the first-ranked firm because of their alleged established relationship in previous contracts, despite alleged poor performance of the favored firm.</td>
<td>Closing notices were sent to the project officer and complainant; no further action was required.</td>
</tr>
<tr>
<td>OAI’s procurement review found that the evaluation ranking resulted in two other firms leading the technical and financial evaluations, and not the alleged favored firm. OAI did not find any red flags of collusive practice that suggests unfair evaluation or biases toward any of the bidders.</td>
<td></td>
</tr>
<tr>
<td>The case was closed because the complaint was not credible.</td>
<td></td>
</tr>
<tr>
<td>The complaint alleged that a contractor engaged in fraudulent practice when it submitted a fake payment claim for personnel mobilization expenses.</td>
<td>Closing notices were issued. OAI issued the firm with a caution reminding it to be more vigilant when preparing and submitting payment claims to ensure that only correct information is included.</td>
</tr>
<tr>
<td>OAI determined that not all personnel listed were mobilized and that some of them were always intended to be engaged on another ADB-financed project. OAI noted that the contractor did not file a duplicate claim and financial adjustment between the two ADB-financed projects had been completed.</td>
<td></td>
</tr>
<tr>
<td>The case was closed as not credible as the contractor’s conduct was not tantamount to fraudulent practice but was the result of carelessness or negligence.</td>
<td></td>
</tr>
<tr>
<td>The complaint alleged that a firm misrepresented its work experience included in two bids for ADB-financed contracts. During bid evaluation, the employer confirmed to the executing agency that the information in the completion certificate was incorrect.</td>
<td>Closing notices were issued. OAI issued the firm with a caution reminding them to ensure the accuracy of all information in bids for ADB-financed contracts.</td>
</tr>
<tr>
<td>OAI obtained independent verification from the employer that the completion certificate, as issued by their office, contained inaccurate information. The firm subsequently requested the employer to correct and re-issue the completion certificate. Given that the alleged work experience information in the bids were based on the false completion certificate provided by the employer, OAI determined that the firm’s actions were not tantamount to a fraudulent practice but were the result of carelessness and negligence.</td>
<td></td>
</tr>
<tr>
<td>The case was closed because the complaint was not credible.</td>
<td></td>
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</tbody>
</table>

*continued on next page*
An anonymous complaint alleged that an executing agency official took a bribe from a contractor to win a contract.

The information provided in the complaint was not sufficient for OAI to make any meaningful inquiries. Further, OAI could not obtain additional information from the complainant due to lack of contact details.

The complaint was closed as the allegation was not verifiable due to lack of specific and verifiable information in the complaint and lack of contact details of the complainant.

The complaint alleged that a local cooperative failed to share its profits with members in 2006. Based on inquiry with the project team, the potentially related project was closed 12 years ago.

Despite asking for further details such as the name of the specific ADB project and how the circumstances related to a possible integrity violation, the complainant did not revert to OAI with information that would allow for meaningful inquiries.

The case was closed because the complaint was not verifiable.

A complainant reported a vague concern alleging that unnamed government officials are involved in corrupt practices and that some unnamed ADB staff based in a resident mission are aware of the corrupt practices.

Despite requests, no other specific details were provided by the complainant to support the allegations.

Given the broadness of the allegations and lack of specificity that would allow further inquiries, the case was closed because the complaint was not verifiable.

The complaint alleged that an executing agency government official demanded that a firm engage in an improper arrangement related to subcontractors that would benefit the official. The firm allegedly did not agree to any arrangement and immediately reported the matter to OAI.

The subject is an executing agency government official, so it is outside OAI’s mandate and falls within the jurisdiction of national authorities to pursue. As the allegation was based on hearsay and no evidence was provided, OAI did not refer the matter to the project team or take further action.

The case was closed because the complaint was outside OAI’s mandate.

<table>
<thead>
<tr>
<th>Disposition and Summary</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not Verifiable</td>
<td>Closing notices were sent, and no further action was required.</td>
</tr>
<tr>
<td></td>
<td>Closing notices were sent, and no further action was required.</td>
</tr>
<tr>
<td></td>
<td>Closing notices were sent to the complainant and to the resident mission country director for their information, and action, as necessary.</td>
</tr>
</tbody>
</table>

Table continued
### Disposition and Summary

An anonymous complaint raised concerns relating to unreasonable bidding criteria and potential violation of ADB procurement rules.

OAI determined that the case is outside its mandate and is better addressed by the ADB project team and ADB’s procurement department, which addressed the complainant’s concerns.

The case was closed because the complaint was outside OAI’s mandate.

A complaint alleged that an individual transferred money to ADB to manage the conflicts of another individual in relation to a project allegedly financed by ADB.

The parties identified in the complaint were not awarded contracts and did not submit bids under any ADB-financed project. OAI was unable to identify any ADB-financed, -administered or -supported project related to the information provided in the complaint.

The case was closed as the complaint was outside OAI’s mandate.

### Other Relevant Considerations

A firm voluntarily disclosed to the ADB project team that it received a verbal allegation of potential leaking of confidential bidding documents for ADB-financed contracts by one of its staff. The firm took immediate appropriate action, including an internal investigation. The firm shared details of these actions with OAI.

The case was closed based on other relevant considerations following the actions taken by the firm to address the allegation.

An ADB representative office referred a complaint of a potential scam involving the use of ADB’s name in the form of a certificate of deposit that was utilized to defraud an individual.

OAI confirmed through its inquiries that the said certificate was fake and was created as part of an attempted scam.

The case was closed based on other relevant considerations, including updating ADB’s scam advisory page on ADB’s website, and providing advice to the complainant regarding the fake certificate of deposit and cease communications with the scammer.

### Action

Closing notice sent to the complainant and the matter was referred to the ADB project team and ADB’s procurement department.

Closing notices were sent, and no further action was required.

Closing notices were issued to the complainant and the ADB project team requesting the executing agency be reminded of the importance of confidentiality during ongoing procurements.

The complainant, representative office, and a relevant ADB department were advised of the scam and of actions taken to alert the public.

*continued on next page*
**Disposition and Summary**

An ADB service department referred to OAI an incident of a breach of security and misuse of an ADB privilege. The department immediately took appropriate actions, which were shared with OAI.

OAI determined that since the parties had a legitimate purpose in accessing the ADB premises and that immediate action had been taken to resolve the matter, OAI closed the complaint based on other relevant considerations.

<table>
<thead>
<tr>
<th>Disposition and Summary</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Closing notice was sent to the ADB service department and OAI reprimanded the parties, which put them on notice of ADB’s expectations of their future conduct.</td>
<td></td>
</tr>
</tbody>
</table>

**Not Material**

The complaint concerned the engagement of a debarred individual as a resource person for an ADB-financed project. Although the minimum debarment period lapsed over 10 years prior, to date the individual has not submitted a request to reinstate their eligibility to participate in ADB-financed, -administered, and -supported activity. As reinstatement is not automatic, the individual remains on the ADB’s sanctions list.

Given the circumstances, OAI determined that the allegation was not sufficiently material to ADB’s interests to warrant further investigation.

The case was closed because the complaint was not material.

<table>
<thead>
<tr>
<th>Disposition and Summary</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Closing notices were sent and OAI issued a Caution to the debarred individual reminding them that they remain debarred and inviting them to apply for reinstatement. OAI reminded the project team of the importance of integrity due diligence during the selection process.</td>
<td></td>
</tr>
</tbody>
</table>

The complaint alleged that an ADB staff member engaged in misrepresentation when the staff did not provide accurate information in response to inquiries related to an ADB-financed project.

OAI determined that the staff’s response to inquiries contained inaccuracies but determined that the staff had no intention to mislead or conceal considering that the information was previously presented, albeit not clearly. While the staff made a misleading statement in the response, the effect of the misleading statement is inconsequential.

The complaint was closed as not material as the staff’s action did not change or alter the outcome of actions related to the project.

<table>
<thead>
<tr>
<th>Disposition and Summary</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Closing notices were sent, and no further action was required.</td>
<td></td>
</tr>
</tbody>
</table>

A sanctioned firm and its sole proprietor violated their sanctions when they submitted bids for an ADB contract while on the second year of their 7-year debarment.

The firm’s sanction was earlier extended for 3 years, and the individual was debarred indefinitely due to a previous sanction violation. Both parties remain debarred to date as they have not applied for reinstatement. As their sanctions were already extended, with the individual being indefinitely debarred, and there was no indication that either subject party participated in any ADB-financed activity since, the case was closed as not material.

<table>
<thead>
<tr>
<th>Disposition and Summary</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Closing notice was sent to the complainant, and no further action was required.</td>
<td></td>
</tr>
</tbody>
</table>

ADB = Asian Development Bank, OAI = Office of Anticorruption and Integrity.
Source: Office of Anticorruption and Integrity, ADB.
## Appendix 3: Examples of External Investigations with Remedial Actions in 2022

<table>
<thead>
<tr>
<th>Remedial Action and Findings</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Caution</strong></td>
<td></td>
</tr>
<tr>
<td>OAI considered a firm’s failure to provide the requested documents despite repeated commitments as indicative of deficiencies in the firm’s record-keeping.</td>
<td>OAI recommended that the firm implement appropriate record-keeping for documentation of ADB-related projects and ensure the efficient and effective storage and accessibility of project files.</td>
</tr>
<tr>
<td>The investigation determined that a firm did not misrepresent functional values in its bid for an ADB-related project as opposed to the allegation that it manipulated data from the original equipment manufacturer to obtain an undue advantage in the technical aspect of the bid.</td>
<td>The firm was cautioned to ensure that information submitted to ADB is sufficient and responsive to requirements, to avoid any suspicion of fraud.</td>
</tr>
<tr>
<td><strong>Reprimand</strong></td>
<td></td>
</tr>
<tr>
<td>The investigation established that an individual provided false information regarding academic credentials submitted to ADB. The individual confirmed to ADB that the information previously provided was inaccurate.</td>
<td>With the individual’s voluntary disclosure of the misrepresentation, OAI issued a reprimand with a reminder to ensure the accuracy of information provided to ADB in the future.</td>
</tr>
<tr>
<td>A firm acknowledged its failure to disclose ongoing contractual commitments and pending litigations. OAI found this failure to be an isolated incident caused by lack of effective oversight.</td>
<td>The firm was reprimanded and is expected to disclose all pending litigations regardless of the amount involved, and all contractual commitments as required in the bidding documents. The firm was further required to strengthen its internal controls to ensure that the information submitted in its bids for ADB-financed contracts is complete and accurate.</td>
</tr>
<tr>
<td><strong>Proposed Debarment</strong></td>
<td></td>
</tr>
<tr>
<td>OAI established that a firm submitted falsified documents and misrepresented that it had the required work experience to comply with the bid requirements for two ADB-financed contracts.</td>
<td>The firm accepted OAI’s proposed debarment of 4 years with conditional reinstatement. The firm may qualify for early reinstatement subject to compliance with the conditions set by OAI.</td>
</tr>
<tr>
<td>While the firm’s actions were aggravated by the harm caused to ADB-related activities and the lack of oversight, OAI however, considered the firm’s degree of cooperation with OAI and steps taken to address the concerns as mitigating circumstances.</td>
<td></td>
</tr>
</tbody>
</table>

*continued on next page*
OAI’s investigation substantiated allegations that a firm engaged in fraudulent practice by misrepresenting its work experience to fulfill eligibility requirements in bids for two ADB-financed contracts. The firm accepted OAI’s findings of fraud through misrepresentation and agreed to OAI’s proposed sanction of the firm and its subsidiaries and branches for 6 years, with an option for early reinstatement after completion of a minimum period of 4 years if it can demonstrate compliance with the conditions set by OAI.

A firm voluntarily disclosed to OAI potential fraudulent practices it committed in relation to an ADB-financed project. After its investigation, OAI determined that fraudulent practices occurred and proposed a conditional non-debarment to the firm, which included conditions that the firm demonstrate that it initiated a risk-based fraud and corruption prevention strategy and implemented an integrity assessment program within a defined time frame. The firm accepted OAI’s proposed conditional non-debarment and demonstrated compliance with the conditions set forth in it.

An executing agency’s evaluation of the technical proposals which identified potential fraud in the submission of a firm prompted a resident mission’s report to OAI of a potential integrity violation. OAI’s investigation substantiated allegations that the firm and an individual engaged in fraudulent practice by misrepresenting the work experience of experts to fulfill eligibility requirements in proposals submitted for two ADB-financed contracts. The firm and individual accepted OAI’s findings of fraud and agreed to OAI’s proposed sanction of 4 years with an option for early reinstatement after completion of a minimum period of 2 years if they demonstrate compliance with the conditions set by OAI. The sanction includes the firm’s branches and subsidiaries.

OAI’s investigation found that a firm submitted falsified documents misrepresenting its work experience to comply with the bid requirements of an ADB-financed contract. In proposing a 2-year debarment with conditional reinstatement of the firm, which was accepted, OAI considered the firm’s cooperation and information provided to assist with the investigation.

### Integrity Oversight Committee (IOC) Debarment

OAI completed its investigation into an allegation that a firm and its proprietor violated a sanction previously imposed by ADB. OAI found that, on a balance of probabilities, a violation of sanction occurred. The IOC concurred with OAI’s findings and debarred the firm and its proprietor for an additional 5-year period. In determining the debarment period, the IOC considered the level of oversight, failure to respond, and degree of cooperation with OAI’s investigation as aggravating factors.

<table>
<thead>
<tr>
<th>Remedial Action and Findings</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>OAI’s investigation substantiated allegations that a firm engaged in fraudulent practice by misrepresenting its work experience to fulfill eligibility requirements in bids for two ADB-financed contracts.</td>
<td>The firm accepted OAI’s findings of fraud through misrepresentation and agreed to OAI’s proposed sanction of the firm and its subsidiaries and branches for 6 years, with an option for early reinstatement after completion of a minimum period of 4 years if it can demonstrate compliance with the conditions set by OAI.</td>
</tr>
<tr>
<td>A firm voluntarily disclosed to OAI potential fraudulent practices it committed in relation to an ADB-financed project. After its investigation, OAI determined that fraudulent practices occurred and proposed a conditional non-debarment to the firm, which included conditions that the firm demonstrate that it initiated a risk-based fraud and corruption prevention strategy and implemented an integrity assessment program within a defined time frame.</td>
<td>The firm accepted OAI’s proposed conditional non-debarment and demonstrated compliance with the conditions set forth in it.</td>
</tr>
<tr>
<td>An executing agency’s evaluation of the technical proposals which identified potential fraud in the submission of a firm prompted a resident mission’s report to OAI of a potential integrity violation. OAI’s investigation substantiated allegations that the firm and an individual engaged in fraudulent practice by misrepresenting the work experience of experts to fulfill eligibility requirements in proposals submitted for two ADB-financed contracts.</td>
<td>The firm and individual accepted OAI’s findings of fraud and agreed to OAI’s proposed sanction of 4 years with an option for early reinstatement after completion of a minimum period of 2 years if they demonstrate compliance with the conditions set by OAI. The sanction includes the firm’s branches and subsidiaries.</td>
</tr>
<tr>
<td>OAI’s investigation found that a firm submitted falsified documents misrepresenting its work experience to comply with the bid requirements of an ADB-financed contract.</td>
<td>In proposing a 2-year debarment with conditional reinstatement of the firm, which was accepted, OAI considered the firm’s cooperation and information provided to assist with the investigation.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Integrity Oversight Committee (IOC) Debarment</th>
</tr>
</thead>
<tbody>
<tr>
<td>OAI completed its investigation into an allegation that a firm and its proprietor violated a sanction previously imposed by ADB. OAI found that, on a balance of probabilities, a violation of sanction occurred.</td>
</tr>
</tbody>
</table>
An executing agency’s due diligence during bid evaluation identified potential fraud by a bidder and reported it to OAI. The investigation confirmed that the bidder submitted falsified work experiences and work experience certificates to meet the bid requirements.

The IOC concurred with OAI’s findings of fraudulent practice and debarred the firm for 2 years.

In determining the debarment period of 5 years for the local agent, the IOC considered the agent’s role in the fraud and lack of cooperation with OAI’s investigation as aggravating factors.

OAI’s investigation found that a firm submitted falsified bid documents that misrepresented its work experience to meet the bid requirements for an ADB-financed contract.

The IOC concurred with OAI’s finding and due to the significance of the firm’s role in the fraudulent practice and its failure to cooperate with OAI’s investigation as aggravating circumstances, debarred the firm for 5 years.

OAI completed its investigation into the allegation that a firm submitted fraudulent manufacturers’ authorizations with its bids for two ADB-financed contracts. OAI found that, on a balance of probabilities, the firm had engaged in fraud.

The IOC concurred with OAI’s findings and debarred the firm for an additional 4-year period. In determining the debarment period, the IOC considered the firm’s failure to respond, and lack of cooperation with OAI’s investigation as aggravating factors.

OAI’s investigation established that a firm engaged in multiple fraudulent practices under two ADB-financed projects by (i) submitting altered curricula vitae of key experts without their consent in one bid; and (ii) misrepresenting that it had not paid fees to an agent in another bid.

Based on OAI’s preliminary finding of fraudulent practice, the IOC temporarily suspended the firm prior to its debarment.

The IOC concurred with OAI’s findings of fraud and debarred the firm for 4 years for engaging in fraudulent practices. The firm’s debarment period commenced from the date of its temporary suspension.

<table>
<thead>
<tr>
<th>Remedial Action and Findings</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>An executing agency’s due diligence during bid evaluation identified potential fraud by a bidder and reported it to OAI. The investigation confirmed that the bidder submitted falsified work experiences and work experience certificates to meet the bid requirements.</td>
<td>The IOC concurred with OAI’s findings of fraudulent practice and debarred the firm for 2 years. In determining the debarment period of 5 years for the local agent, the IOC considered the agent’s role in the fraud and lack of cooperation with OAI’s investigation as aggravating factors.</td>
</tr>
<tr>
<td>OAI’s investigation found that a firm submitted falsified bid documents that misrepresented its work experience to meet the bid requirements for an ADB-financed contract.</td>
<td>The IOC concurred with OAI’s finding and due to the significance of the firm’s role in the fraudulent practice and its failure to cooperate with OAI’s investigation as aggravating circumstances, debarred the firm for 5 years.</td>
</tr>
<tr>
<td>OAI completed its investigation into the allegation that a firm submitted fraudulent manufacturers’ authorizations with its bids for two ADB-financed contracts. OAI found that, on a balance of probabilities, the firm had engaged in fraud.</td>
<td>The IOC concurred with OAI’s findings and debarred the firm for an additional 4-year period. In determining the debarment period, the IOC considered the firm’s failure to respond, and lack of cooperation with OAI’s investigation as aggravating factors.</td>
</tr>
<tr>
<td>OAI’s investigation established that a firm engaged in multiple fraudulent practices under two ADB-financed projects by (i) submitting altered curricula vitae of key experts without their consent in one bid; and (ii) misrepresenting that it had not paid fees to an agent in another bid. Based on OAI’s preliminary finding of fraudulent practice, the IOC temporarily suspended the firm prior to its debarment.</td>
<td>The IOC concurred with OAI’s findings of fraud and debarred the firm for 4 years for engaging in fraudulent practices. The firm’s debarment period commenced from the date of its temporary suspension.</td>
</tr>
</tbody>
</table>

ADB = Asian Development Bank, IOC = Integrity Oversight Committee, OAI = Office of Anticorruption and Integrity.

Source: Office of Anticorruption and Integrity, ADB.
Appendix 4: Proactive Integrity Review Processes

OAI conducts proactive integrity reviews and special proactive integrity reviews on selected ongoing sovereign projects to assess controls over processes that may give rise to integrity risks and make recommendations to mitigate such risks. Special proactive integrity reviews are similar to proactive integrity reviews with respect to execution and evaluation phases, but have an added flexibility of determining the thematic nature, scope, and breadth of an assessment.

Review outcomes further strengthen the accountability of project stakeholders and controls over processes, enhance transparency, and foster fairness in procurement processes. The following figure depicts proactive integrity review processes.

*Figure A4: Proactive Integrity Review Process Flow*

Preliminary Planning
- Identify projects based on selection
- Notify ADB stakeholders

Detailed Planning
- Understand the project and determine the review scope and procedures
- Recruit consultants
- Arrange mission logistics
- Inform stakeholders of review requirements

Fieldwork and Preliminary Analysis
- Review documentation and conduct interviews
- Inspect project assets
- Analyze and document preliminary findings and risk implications
- Discuss preliminary findings with the executing and/or implementing agency and ADB’s operation department
- Draft the findings and recommendations matrix and seek additional comments

Detailed Analysis and Reporting
- Draft the report and seek comments from the executing and/or implementing agency and ADB’s operations and other relevant departments
- Issue the final report to the executing and/or implementing agency and ADB’s operations and other relevant departments
- Publish the final redacted report on ADB’s website
- OAI addresses comments and feedback before finalizing the report.

ADB = Asian Development Bank, OAI = Office of Anticorruption and Integrity.
Source: Office of Anticorruption and Integrity, ADB.
## Appendix 5: Highlights of Completed Integrity-Related Reviews in 2022

<table>
<thead>
<tr>
<th>Project</th>
<th>Review Highlights</th>
</tr>
</thead>
</table>
| Outer Island Maritime Infrastructure Project: Follow-Up Review of Proactive Integrity Review Recommendations (Tuvalu) | The follow-up review assessed the implementation status of nine recommendations relating to the following findings from the 2021 proactive integrity review and evaluated the associated integrity risks:  
• Financial management: review prior to processing of payment invoices  
• Procurement: evaluate bidders’ financial capacity  
• Asset management: adequate performance security  
• Institutional capacity: records management |
| Internal Review Relating to ADB Sanctions | The review, which resulted in the issuance of three internal reports containing findings and recommendations, covered 37 sovereign projects, and disclosed that several executing and implementing agencies did not have access to ADB's complete sanctions list, which may indicate a lack of awareness of relevant ADB sanctions-related requirements. OAI recommended that ADB project officers should regularly remind and provide needed assistance to the executing and implementing agencies to ensure that they (i) designate person(s) with a need-to-know to gain access to ADB's complete sanctions list; (ii) check entities against ADB's complete sanctions list during key stages of a project’s life cycle, and (iii) understand where, how, and what to report if there is an integrity concern or allegations of integrity violation on an ADB-related activity. |

ADB = Asian Development Bank, OAI = Office of Anticorruption and Integrity.  
Source: Office of Anticorruption and Integrity, ADB.
Appendix 6: Knowledge Products and Services Developed in 2022

The following are knowledge products and selected services developed by OAI in 2022.

<table>
<thead>
<tr>
<th>Category</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document</td>
<td>Outer Island Maritime Infrastructure Project: Follow-Up Review of Proactive Integrity Review Recommendations</td>
</tr>
<tr>
<td>Publication</td>
<td>Office of Anticorruption and Integrity Annual Report 2021</td>
</tr>
<tr>
<td>Publication</td>
<td>Annual Report 2021—Highlights Brochure</td>
</tr>
<tr>
<td>e-Newsletter</td>
<td>Integrity e-Bulletin Issue No. 55</td>
</tr>
<tr>
<td>e-Newsletter</td>
<td>Integrity e-Bulletin Issue No. 56</td>
</tr>
<tr>
<td>e-Newsletter</td>
<td>Integrity e-Bulletin Issue No. 57</td>
</tr>
<tr>
<td>e-Newsletter</td>
<td>Integrity e-Bulletin Issue No. 58</td>
</tr>
<tr>
<td>e-Newsletter</td>
<td>Integrity e-Bulletin Issue No. 59 (internal email only)</td>
</tr>
<tr>
<td>e-Newsletter</td>
<td>Integrity e-Bulletin Issue No. 60</td>
</tr>
<tr>
<td>Publication</td>
<td>Frequently Asked Questions on ADB Sanctions (available in 12 languages)</td>
</tr>
<tr>
<td>Publication</td>
<td>Anticorruption Policy (Chinese)</td>
</tr>
<tr>
<td>Speech</td>
<td>Regional Consultation on BEPS: Addressing the Tax Challenges of Digitalization: Further Developments on the Two–Pillar Solution (Head, OAI, John Versantvoort)</td>
</tr>
<tr>
<td>Speech</td>
<td>International Tax Cooperation in Asia: Virtual Workshop (Head, OAI, John Versantvoort)</td>
</tr>
<tr>
<td>Speech</td>
<td>Global Forum Plenary Meeting 2022 (Head, OAI, John Versantvoort)</td>
</tr>
<tr>
<td>Speech</td>
<td>Regional Consultation on International Tax Matters for Asia-Pacific (Director, Prevention and Compliance Division, OAI, Lisa Kelaart-Courtney)</td>
</tr>
<tr>
<td>Video</td>
<td>#IntegrityByTheNumbers—Episode 5: Complaints and Investigations (July–December 2021)</td>
</tr>
<tr>
<td>Video</td>
<td>#IntegrityByTheNumbers—Episode 6: Complaints and Investigations (January–June 2022)</td>
</tr>
<tr>
<td>Video</td>
<td>iACT iTalk Shorts video series (8 episodes)</td>
</tr>
<tr>
<td>Video</td>
<td>iACT iTalk—Episode 14: Sanctions Management in ADB Operations (ADB-only access)</td>
</tr>
<tr>
<td>Video</td>
<td>iACT iTalk—Episode 15: Impacts of Development Bank Sanctions</td>
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continued on next page
Table A6.1 continued

<table>
<thead>
<tr>
<th>Category</th>
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<tbody>
<tr>
<td>Video</td>
<td>International Anticorruption Day 2022 Joint MDB Message</td>
</tr>
<tr>
<td>Video</td>
<td>Office of Anticorruption and Integrity: 2021 Annual Report (Full Video)</td>
</tr>
<tr>
<td>Video</td>
<td>Office of Anticorruption and Integrity: 2021 Annual Report (Short Video)</td>
</tr>
<tr>
<td>Website</td>
<td>Office of Anticorruption and Integrity 2021 Annual Report Microsite</td>
</tr>
<tr>
<td>Website</td>
<td>Approach Paper to Sanctions Management in ADB Operations (ADB-only access)</td>
</tr>
<tr>
<td>Website</td>
<td>International Anticorruption Day 2022—Building Trust, Igniting Integrity: Sustaining Relationships in Rebuilding Asia and the Pacific</td>
</tr>
<tr>
<td>Website</td>
<td>Episode 5: Complaints and Investigations (July–December 2021)</td>
</tr>
<tr>
<td>Website</td>
<td>Episode 6: Complaints and Investigations (January–June 2022)</td>
</tr>
<tr>
<td>Website</td>
<td>The Integrity Learning Series: People’s Republic of China Consulting and Contracting Firms, Trade Associations, and Advisory Firms</td>
</tr>
<tr>
<td>Website</td>
<td>The Integrity Learning Series: People’s Republic of China Executing and Implementing Agencies, and Project Management Units</td>
</tr>
<tr>
<td>Website</td>
<td>The Integrity Learning Series: Anticorruption and Integrity Training for the Executing and Implementing Agencies and Project Implementation Units of the Skills Development for a Modern Economy Project in Uzbekistan</td>
</tr>
<tr>
<td>Website</td>
<td>The Integrity Learning Series: Anticorruption and Integrity Training for the Central and West Asia Department (CWRD) Energy Sector</td>
</tr>
<tr>
<td>Website</td>
<td>The Integrity Learning Series: Anticorruption and Integrity Training for Loan 4166—Assam Skill University Project</td>
</tr>
<tr>
<td>Website</td>
<td>The Integrity Learning Series: Anticorruption and Integrity Training for CWRD Water Sector</td>
</tr>
</tbody>
</table>

ADB = Asian Development Bank, BEPS = base erosion and profit shifting, CWRD = Central and West Asia Department, MDB = multilateral development bank, OAI = Office of Anticorruption and Integrity.

Source: Office of Anticorruption and Integrity, ADB.
Table A6.2: Office of Anticorruption and Integrity Knowledge Services Summary, 2022

<table>
<thead>
<tr>
<th>Category</th>
<th>Title</th>
<th>Audience</th>
<th>No. of Sessions</th>
<th>No. of Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Workshop or seminar</td>
<td>Various workshops for ADB staff, consultants, and contractors</td>
<td>ADB personnel</td>
<td>33</td>
<td>1,586</td>
</tr>
<tr>
<td>Workshop or seminar</td>
<td>Various workshops under RETA 9703</td>
<td>External</td>
<td>15</td>
<td>2,589</td>
</tr>
<tr>
<td>Workshop or seminar</td>
<td>Various workshops under RETA 9706</td>
<td>External</td>
<td>3</td>
<td>94</td>
</tr>
<tr>
<td>Workshop or seminar</td>
<td>Various workshops under RETA 9433</td>
<td>External</td>
<td>63</td>
<td>4,858</td>
</tr>
<tr>
<td>Workshop or seminar</td>
<td>Regional Workshop on Advancing Beneficial Ownership Transparency</td>
<td>External</td>
<td>1</td>
<td>372</td>
</tr>
<tr>
<td>Workshop or seminar</td>
<td>APEC Workshop on Technology for Transparency</td>
<td>External</td>
<td>1</td>
<td>186</td>
</tr>
<tr>
<td>Workshop or seminar</td>
<td>Association of Certified Anti-Money Laundering Specialists</td>
<td>External</td>
<td>1</td>
<td>140</td>
</tr>
<tr>
<td>Workshop or seminar</td>
<td>Corruption: Global Solutions for a Global Problem</td>
<td>External</td>
<td>1</td>
<td>166</td>
</tr>
<tr>
<td>Workshop or seminar</td>
<td>ASEAN–Australia–New Zealand Free Trade Area Economic Cooperation Activity</td>
<td>External</td>
<td>1</td>
<td>24</td>
</tr>
<tr>
<td>Workshop or seminar</td>
<td>Promoting Regional Cooperation in Crime Prevention and Criminal Justice in Asia</td>
<td>External</td>
<td>1</td>
<td>108</td>
</tr>
<tr>
<td>Workshop or seminar</td>
<td>ADB Procurement Roundtable</td>
<td>External</td>
<td>1</td>
<td>16</td>
</tr>
<tr>
<td>E-learning</td>
<td>Anticorruption and Integrity in ADB</td>
<td>ADB personnel and external</td>
<td>1 ongoing</td>
<td>278</td>
</tr>
<tr>
<td>E-learning</td>
<td>Combating Money Laundering and Terrorist Financing</td>
<td>ADB personnel and external</td>
<td>1 ongoing</td>
<td>6</td>
</tr>
<tr>
<td>E-learning</td>
<td>Are You An Integrity Champion?</td>
<td>ADB personnel and external</td>
<td>1 ongoing</td>
<td>75</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>124</td>
<td>10,498</td>
</tr>
</tbody>
</table>

ADB = Asian Development Bank, APEC = Asia-Pacific Economic Cooperation, ASEAN = Association of Southeast Asian Nations, RETA = regional technical assistance

Source: Office of Anticorruption and Integrity, ADB.
Table A6.3: iACT iLearn: Office of Anticorruption and Integrity Knowledge-Sharing Series Summary, 2022

<table>
<thead>
<tr>
<th>Title</th>
<th>No. of Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>iACT iLearn! Access to AIID data</td>
<td>30</td>
</tr>
<tr>
<td>iACT iLearn! Brownbag on the New Governance Assessment Staff Guidance</td>
<td>55</td>
</tr>
<tr>
<td>iACT iLearn! On OneADB Today Updates</td>
<td>60</td>
</tr>
<tr>
<td>iACT iLearn! On Negative News Screening</td>
<td>21</td>
</tr>
<tr>
<td>iACT iLearn! On Social Media Use with the Office of Professional Ethics and Conduct</td>
<td>61</td>
</tr>
</tbody>
</table>

ADB = Asian Development Bank, AIID = Investigations Division, Office of Anticorruption and Integrity.
Source: Office of Anticorruption and Integrity, ADB.
If you have information about possible violations to ADB’s Anticorruption Policy, please contact the Office of Anticorruption and Integrity:

Tel        +63 2 8632 5004  
Fax        +63 2 8636 2152  
E-mail    integrity@adb.org or anticorruption@adb.org  
Web        www.adb.org/integrity

Connect with us on social media:

ADB Anticorruption and Integrity
@anticorruptionandintegrity
@ADB_OAI
ADB Integrity
Office of Anticorruption and Integrity Annual Report 2022

This report provides an overview of the accomplishments of the Asian Development Bank’s Office of Anticorruption and Integrity (OAI) during 2022. It explains how OAI has led ADB’s integrity risk management initiatives through its investigation and enforcement activities and its prevention and compliance advisory function. OAI’s work included, for example, complaints assessments and investigations, proactive integrity reviews, and integrity due diligence on over 3,500 subjects. The report also highlights OAI’s knowledge and outreach activities, which reached over 10,000 participants through 124 learning events covering a wide range of topics, such as detecting fraud and corruption.

About the Asian Development Bank

ADB is committed to achieving a prosperous, inclusive, resilient, and sustainable Asia and the Pacific, while sustaining its efforts to eradicate extreme poverty. Established in 1966, it is owned by 68 members—49 from the region. Its main instruments for helping its developing member countries are policy dialogue, loans, equity investments, guarantees, grants, and technical assistance.