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<td>Asian Development Bank</td>
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<td>AML/CFT</td>
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<td>BPMSD</td>
<td>Budget, People, and Management Systems Department</td>
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<td>COVID-19</td>
<td>coronavirus disease</td>
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<td>developing member country</td>
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<td>Green Climate Fund</td>
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<td>integrity due diligence</td>
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<td>MDB</td>
<td>multilateral development bank</td>
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<td>new operating model</td>
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<tr>
<td>OECD</td>
<td>Organisation for Economic Co-operation and Development</td>
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<td>OPEC</td>
<td>Office of Professional Ethics and Conduct</td>
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<td>PIR</td>
<td>proactive integrity review</td>
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<td>PRC</td>
<td>People’s Republic of China</td>
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<td>SIDS</td>
<td>small island developing state(s)</td>
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About the Office of Anticorruption and Integrity

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

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.

ADB applies a three-lines-of-defense model for managing integrity risk and associated reputational impact. OAI performs the second-line-of-defense activities for integrity risk, including integrity risk review and challenge functions. In addition, OAI assesses and investigates reports of suspected integrity violations.

Consistent with this mandate, OAI undertakes its role within two core functional lines:

- **Prevention and compliance.** 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 (TA) on the adoption of international standards to prevent fraud and corruption and combat illicit financial flows through its programs on anti-money laundering and combating the financing of terrorism (AML/CFT), and tax integrity.

- **Investigations.** OAI is responsible for receiving and assessing reports of suspected integrity violations in 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.

OAI comprises the following 50 staff across three divisions (the Office of the Head, the Prevention and Compliance Division, and the Investigations Division): the head of the office, 2 directors, 2 advisors, 16 international staff (including 1 secondee), 22 national staff, and 7 administrative staff. OAI engages expert consultants, contractors, and external investigation and audit firms to support its operations.

This publication presents the 2023 accomplishments of OAI.
Integrity Risk Management in a Changing Asia and the Pacific: Toward a Risk-Based Approach

In 2023, ADB embarked on its most significant organizational change since 2002. In response to significant shifts in the development landscape, ADB adopted a new operating model (NOM). Under the NOM, ADB seeks to use its capabilities more effectively “... to offer more solutions to clients, scale up climate action, better support private sector development... and mobilize private financing, while becoming more client-centric by working more closely, innovatively, and collaboratively with clients.” The climate change mitigation and adaptation challenges facing the Asia and Pacific region form a key driver for the NOM.

Among other things, the NOM is calling for a wider application of risk-based approaches. As part of its transformation agenda, ADB’s approach to identifying and managing integrity risk is becoming more attuned and responsive to different risk levels and stakeholder needs. The approach aims to balance proactive (preventative) and reactive (investigative) approaches to integrity concerns along a three-lines-of-defense model that is implemented more consistently across the institution. This requires a bank-wide effort to strengthen policies, systems, and skills, for which OAI planted the first seeds in 2023.

Amid this transformation agenda, OAI continues to deliver on its core work across prevention and investigation activities. OAI’s core work observed the following key trends in 2023:

• A marked increase in the number of entities requiring integrity due diligence by ADB as a result of the emergence of risk factors associated with climate change projects in ADB’s nonsovereign operations.

• An increase in the number of referrals in sovereign operations during the second half of 2023 arising from changes to business process brought about by ADB’s NOM, which provides for OAI involvement at an early stage during project processing through the OneADB team.

It is our duty to ensure that all climate projects and initiatives supported by ADB are protected from corruption... We believe that transparency, integrity, and honesty are the foundation of strong relationships. These values are essential to achieve our vision of a prosperous, inclusive, resilient, and sustainable Asia and the Pacific.

Masatsugu Asakawa
ADB President
• A significant expansion in the number of cooperation and cofinancing agreements with United Nations (UN) agencies by reaching agreements on key integrity provisions to help prevent fraud and corruption through reporting and investigations.

• A 120% increase (33 cases) in the number of complaints of staff misconduct, potentially because of increased interpersonal conflicts as ADB personnel returned to the office after the coronavirus disease (COVID-19) pandemic.

In 2024, OAI will continue to develop and refine policies, processes, and systems for integrity risk management across ADB. OAI anticipates enhancing its tools for integrity risk management, including the development of technological aids to help identify, monitor, and manage integrity risks. This includes the expansion of the Sanctions Screening Portal (SSP) to cover a broader array of potential integrity risks on top of debarments, cross debarments, and UN Security Council and other national sanctions. By doing so, OAI seeks to fully leverage the monitoring capabilities the SSP can provide project teams.

OAI also looks forward to the implementation of the Investigations and Enforcement Framework to replace the Integrity Principles and Guidelines. The new framework will strengthen the independence of ADB’s sanctions process by introducing a first-tier sanctions body (i.e., the Integrity Enforcement Committee) and an appeals body (i.e., the Enforcement Appeals Committee), and expanding the grounds for appeal and the bases for publication of ADB debarment sanctions.

In November 2024, ADB, with OAI at the helm, will be hosting for the first time the Conference of International Investigators at its headquarters in Manila, inviting investigations professionals from international and multilateral agencies around the world to discuss collaboration, harmonization, and challenges in fraud and corruption investigations.

Integrity by the Numbers: Key Facts and Figures

Prevention and Compliance

• OAI reviewed 1,275 entities for integrity due diligence, a 10% increase from 2022. Of these, 827 (65%) were entities involved in transactions under ADB’s nonsovereign and sovereign operations, while the remaining 448 (35%) involved reviews on vendors, guest speakers at ADB events, counterparties for partnership or affiliation, and counterparties of the Treasury Department.

• OAI increased the total number of entities under continuous screening in the SSP to more than 163,000 entities, a 35% increase from 2022.

• OAI responded to 143 know-your-counterparty requests including due diligence calls, a 25% increase from 2022.

• OAI issued five special proactive integrity review reports on selected projects in the health, transport, and water and urban infrastructure and service sectors in India, the Lao People’s Democratic Republic, and the Philippines; and one follow-up review report for an education project in Bangladesh.

• OAI reached an audience of 5,916 representatives from ADB’s DMCs and ADB personnel through 84 knowledge-sharing sessions.
Investigations

- OAI received 196 new complaints and had 58 complaints undergoing assessment from 2022 of alleged integrity violations on ADB projects or by ADB staff. Of these, OAI completed an assessment of 150 complaints during the year, with a further 43 complaints pending endorsement or administrative closing, leaving 61 under active assessments at year-end.
- OAI closed 4 investigations related to alleged misconduct by ADB staff, with 3 cases referred for disciplinary or nondisciplinary action.
- In addition to 162 investigations from previous years, OAI commenced 55 new investigations involving external parties. OAI closed 42 external investigations, of which 29 resulted in remedial actions: debarments were imposed in 18 investigations, and cautions and reprimands were issued in 11.
- OAI debarred 372 firms and 10 individuals resulting from acceptance of OAI’s proposed debarment with conditions, and decisions made by the Integrity Oversight Committee (IOC).
- OAI reinstated the eligibility of 142 firms and 6 individuals to participate in activities financed, administered, or supported by ADB.

“\n
The fight against corruption is about more than legal norms, techniques, and methodologies. It is about a joint commitment to shared values. Values are often implicit, and sometimes it helps to articulate them so that we can remind ourselves and each other.

John Versantvoort
OAI Head
Prevention and Compliance

Integrity Due Diligence

To assist ADB in assessing and managing integrity risk, OAI conducts due diligence on ADB's projects and provides advisory support to other departments in areas of integrity, including AML/CFT, bribery and corruption, tax integrity, and related reputational risk. OAI works across ADB to ensure that integrity risks are detected, assessed, mitigated, and disclosed as appropriate.

In 2023, OAI reviewed 1,275 entities for integrity due diligence (IDD), a 10% increase from 2022. Of these, 827 (65%) were entities involved in transactions under ADB’s nonsovereign and sovereign operations, while the remaining 448 (35%) involved reviews on vendors, guest speakers at ADB events, counterparties for partnership or affiliation, and counterparties of the Treasury Department, among others (Figure 1).

The increase in volume of IDD for nonsovereign projects resulted from the increased complexity of ADB projects, with associated heightened and new risk factors. For example, comprehensive IDD analysis was required on ADB’s climate change projects for indications of forced labor in the solar supply chain.

Operational changes brought about by ADB’s NOM resulted in the requirement that OAI be included as a reviewer for sovereign projects. This enabled OAI to be involved at an early stage of project development along with the other members of the project’s OneADB team. As a result, OAI saw a significant increase in the number of referrals from sovereign operations during the second half of 2023.

OAI continued the implementation of the ADB Sanctions Controls Framework through the SSP, a tool created by OAI and the Private Sector Operations Department to provide staff the ability to screen and monitor counterparties for sanctions-related risks in ADB’s operations—i.e., ADB debarments, multilateral development bank (MDB) cross debarments, UN Security Council sanctions, and other national sanctions. During 2023, the total number of entities under continuous screening in the SSP grew to more than 163,000, a 145% increase since its launch in 2021 (Figure 2).

Reflecting the growing usage of the SSP across ADB, OAI responded to 293 integrity-related requests to provide advice on how to respond to risks identified from the SSP, an 81% increase from 2022 (Figure 3). Requests for advice included (but were not limited to) queries on the eligibility of counterparties with ongoing reprimands.
or cautions issued by OAI, and requests for clearance on payments to debarred entities with preexisting contracts.

OAI is expanding the SSP so that it screens for broader integrity risks beyond sanctions risk. This includes integrity risks associated with convictions relating to fraud, corruption, collusion, coercion, as well as adverse media that could impact ADB’s reputation. This will enable OAI to leverage the monitoring capabilities of the SSP to provide a comprehensive view of integrity risks.

OAI’s IDD team referred 34 suspected breaches of debarment conditions and/or possible integrity violations to OAI’s Investigations Division (a 55% increase from 2022) and 20 matters involving 11 debarred entities (including those for contract variations) that were identified as part of checks using the SSP to OAI’s Office of the Head for further analysis and advice. More than half of the referrals were related to counterparties in projects in the transport (21) and agriculture (16) sectors (Figure 4).
The Integrity Due Diligence Team of the Office of Anticorruption and Integrity Identifies Debarred Entity in Civil Works Contract Bid

The Integrity Due Diligence (IDD) team of the Office of Anticorruption and Integrity (OAI) received a request from a regional department project team to provide IDD screening of a bidder in a civil works contract funded by the Asian Development Bank (ADB).

The IDD team observed that an entity’s name closely matched that of an ADB debarred entity. On verification of further information, OAI confirmed that the entity had been debarred by ADB. The matter was referred to OAI’s Investigation Division, which completed an investigation into allegations of a sanction violation. This resulted in additional sanctions being applied to the debarred entity, including its name being published on ADB’s Sanctions List.

The case showed the importance of verifying ADB counterparties, including the transcription of foreign-language names.

Source: ADB (OAI).
Know-Your-Counterparty Requests

In an environment of increasing focus on counterparty risk, ADB itself is also the subject of due diligence from counterparties, notably financial institutions. During 2023, OAI responded to 143 know-your-counterparty requests, including due diligence calls, a 25% increase from 2022. 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) on selected ongoing sovereign projects financed and/or administered by ADB to assess key project integrity risks relating to procurement, financial management, asset management, and institutional capacity (Appendix 1 details the PIR process flow). In 2023, OAI fully resumed on-site assessments and issued reports for five PIRs and conducted a follow-up review of a previous PIR.

OAI issued five special PIR reports on selected projects valued at $1,657 million in the health, transport, and water and urban infrastructure and service sectors in India, the Lao People’s Democratic Republic, and the Philippines. Key findings pertained to deficiencies in bid evaluation, lack of access to ADB’s complete Sanctions List, absence of protocols to manage integrity-related complaints and violations, and inadequate accounting system controls. Appendix 2 highlights the key results of the PIR reports issued in 2023.

Health system enhancement. ADB supported the Department of Health in addressing the coronavirus disease pandemic by providing medical equipment to various hospitals in the Philippines (photo by the Office of Anticorruption and Integrity, ADB).

OAI also issued a follow-up review report on a multitranche financing facility program valued at $100 million in the education sector in Bangladesh. The review assessed the implementation status of recommendations relating to 12 PIR findings raised in the 2019 PIR and requested the executing agency to continue addressing OAI’s recommendations related to verification of payment milestones, fund management, and conflicts of interest management.
Integrity Risk Management Reviews of Projects

OAI provides integrity risk advice on sovereign projects financed and/or administered by ADB during various stages of the project lifecycle, covering project preparation, implementation, and evaluation. At the request of regional and other departments, OAI reviewed and provided integrity risk advice for 200 preapproval packages, including concept papers, TA reports, memos on change in scope and/or implementation arrangements, and reports and recommendations of the President to the Board of Directors. OAI also reviewed 27 project and TA completion reports and 11 other documents, including evaluation reports.

In 2023, OAI continued to support the ADB regional departments in assessing corruption risks and developing mitigation measures for governance risk assessments prepared as part of the country partnership strategies for Azerbaijan, Bhutan, Cambodia, Georgia, the Philippines, and Turkmenistan.

Sustainable cassava cultivation. Farmers lay out their cassava harvest to dry after receiving support from the ADB-assisted Sustainable Natural Resource Management and Productivity Enhancement Project in the Lao People’s Democratic Republic (photo by ADB).
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 reports of suspected integrity violations in ADB-related activity by staff or third parties. 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 3 outlines the processes for complaints assessment, external investigations, and internal investigations.

Complaints Assessment

OAI screens complaints to confirm that they are

- within OAI’s mandate—they 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 2023, OAI received 196 new complaints of suspected integrity violations on ADB projects or by ADB staff, two more than the number of complaints received in 2022. A further 52 complaints received were not considered as integrity-related complaints, such as contractual disputes between external parties, safeguarding and land disputes, and operational and procurement-related complaints. OAI referred these matters directly to other relevant ADB departments for handling (including 12 referrals to the Procurement, Portfolio, and Financial Management Department) and provided appropriate advice to the complainants.

The 196 new complaints were reported by external parties (105) such as competing bidders or executing agencies, ADB staff (60), and anonymous complainants (31). Most complaints pertained to allegations of fraudulent practice, corruption, and collusion as set out in Figure 5.

There was a 120% year-on-year increase in allegations involving ADB staff (33 cases), which OAI attributes to the post-pandemic work environment with the return of staff working at the ADB headquarters and resident missions, and increased mission travel. Moreover, the effective triage of workplace concerns and expanded outreach activities by ADB’s Office of Professional Ethics and Conduct (OPEC) resulted in 12 referrals of alleged staff misconduct to OAI (a 140% increase from 2022).

At the beginning of 2023, 58 complaints remained under review from 2022. In 2023, OAI received 196 new complaints, resulting in 254 complaints being assessed during the year. Of these, the assessment process for 150 complaints was fully concluded, with these matters either converted for further investigation (55 external matters and 12 internal matters) or closed (83 matters).
All complaints carried forward from 2022 and 47% of those opened in 2023 were fully assessed. The average time taken to assess a complaint in 2023 was 53 working days, higher than the 43 working days in 2022, which is attributed to personnel changes and recruitments during the year (Figure 6).

Of the 83 complaints closed, 70 did not meet one or more of the prescribed assessment criteria. OAI issued a caution in five cases and a reprimand in one case and determined that sufficient other actions had been taken in seven 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 7).

The OAI assessment determined that 53 complaints were not credible because the information provided as part of the allegations was found to be materially inaccurate. Five complaints were not verifiable as they lacked sufficient information or details to establish the veracity of the
allegations. Another 10 complaints were closed as the allegations were determined to be outside OAI’s mandate, while two complaints ceased to be material to warrant further investigation. Examples of complaints closed by OAI in 2023 are presented in Appendix 4.

At year-end, 104 complaints remained open, of which 61 were undergoing active assessment, and the remaining 43 complaints pending endorsement or administrative closing.

External Investigations

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

OAI’s external investigations are further classified and monitored according to fragile and conflict-affected situations (FCAS), small island developing states (SIDS), and non-FCAS and/or non-SIDS in line with ADB’s FCAS and SIDS Approach approved in April 2021.²

In 2023, 55 new complaints against external parties were assessed by OAI as warranting further investigation. These complaints pertained to alleged fraudulent practice, collusion, conflict of interest, and corruption (Figure 8). One new complaint fell under FCAS while two were under SIDS.

At the beginning of 2023, OAI had 162 external investigations remaining open from previous years. It commenced 55 new investigations and closed 42 investigations during 2023. Of the closed investigations, 29 resulted in remedial action, with debarments imposed in 18 investigations, and cautions and reprimands issued in 11.

Five investigations were closed after OAI found that the allegations, although confirmed, did not warrant further action as the issues raised were either resolved or mitigated.

In one investigation, OAI issued a declination notice as the subject was classified as FCAS and, given the fragile situation where the project was executed, OAI was constrained from conducting a full investigation into

the allegation. The declination notice included a condition prohibiting the subject from participating in any ADB-related activity for 3 years but does not affect the subject’s existing contractual obligations.

Seven investigations were also closed without remedial action as they were unsubstantiated or disproven. Figure 9 details these closed investigations.

At year-end, 175 external investigations remained open. These included 33 cases for which investigations had been concluded and the proposed remedial action was under review. Eight of the open investigations are under FCAS and five are under SIDS.
Remedial Actions

In 2023, 372 firms and 10 individuals (Table 1) were debarred after accepting OAI’s proposed debarment with conditions or as a result of decisions by the Integrity Oversight Committee (IOC). These debarments were in relation to 15 investigations; 11 of these cases were closed in 2023 and 4 remain open with administrative requirements relating to their remedial action being processed.

In one investigation, a firm accepted OAI’s proposed conditional non-debarment. A conditional non-debarment is imposed if the investigation determines that a 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 2023 included the following:

• ADB’s IOC concurred with OAI’s findings and imposed a debarment period of 6 years on a project adviser-cum-team leader, and 4 years on this individual’s sibling and the firm owned by the latter. The IOC also imposed a minimum debarment period of 3 years on three other firms and individuals. The debarred parties are required to comply with reinstatement conditions before they may apply for reinstatement of their eligibility to participate in activities financed, administered, or supported by ADB.

• A sole proprietor firm and its owner accepted ADB’s proposed debarment of 7 years with an option for early reinstatement after completion of a minimum period of 5 years and fulfillment of conditions set by OAI. Prior, ADB had debarred

| Table 1: Remedial Actions for External Parties, 2023 |
|-----------------|--------|--------|
| Remedial Action                           | Firm   | Individual | Total |
| Debarred                        | 372    | 10        | 382    |
| Office of Anticorruption and Integrity proposed debarment—accepted | 238$^a$ | 3        | 241    |
| Office of Anticorruption and Integrity proposed conditional non-debarment—accepted | 1    | 0        | 1      |
| Integrity Oversight Committee—imposed   | 133$^b$ | 7        | 140    |
| Reprimanded                      | 13     | 4        | 17     |
| Cautioned                       | 6      | 3        | 9      |
| Cross Debarred                  | 82     | 28       | 110    |

$^a$ This includes 231 branches, subsidiaries, or affiliates who were debarred to avoid the circumvention of the sanction by their parent.

$^b$ This includes 125 branches, subsidiaries, or affiliates who were debarred to avoid the circumvention of the sanction by their parent.

Source: Asian Development Bank (Office of Anticorruption and Integrity).

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3 This includes 356 branches, subsidiaries, or affiliates who were debarred to avoid the circumvention of the sanction by their parent.

4 ADB’s Published Sanctions List is available here: ADB. Anticorruption and Integrity. Published Sanctions List. This list is a subset of ADB’s Complete Sanctions 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.

5 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).
the sole proprietor for engaging in fraudulent practice. While debarred, the firm engaged in a fraudulent practice when it misrepresented its eligibility to participate in ADB-related activities in three bids for three ADB-financed contracts and signed one ADB-financed contract.

• OAI’s investigation found that a firm engaged in fraudulent practice by misrepresenting its work experience in its bids under two ADB projects. The firm accepted a proposed 4-year debarment with conditional reinstatement after a minimum of 3 years if it demonstrates compliance with reinstatement conditions, including to improve its bid proposal procedures and update its anticorruption-related policies and practices. The firm is ineligible to participate in ADB projects while debarred. The debarment 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. OAI proposed, and the firm accepted, a 2-year debarment from participating in any activities financed, administered, or supported by ADB, which extends to all its subsidiaries and branches, subject to reinstatement after completing a minimum period of 18 months and upon fulfillment of the conditions imposed by OAI.

• ADB’s IOC concurred with OAI’s findings that a firm engaged in fraudulent practice in its bid for an ADB-financed contract. The IOC determined that the firm submitted misrepresentations and falsified documents in response to the executing agency’s requests for information during the bid evaluation. The IOC considered the firm’s failure to cooperate with OAI’s investigation an aggravating factor and debarred the firm for 4 years.

Appendix 5 provides further examples of external investigations and remedial actions undertaken in 2023.

**Appeals**

In 2023, three firms and three individuals submitted appeals against the IOC’s debarment decisions in three separate cases. The appeals did not present new and relevant information, and thus failed to meet the requirements in the Integrity Principles and Guidelines for consideration by the Sanction Appeals Committee (Integrity Principles and Guidelines, para. 98).

**Reinstatement of Debarred Parties**

After assessing applications for reinstatement, ADB reinstated 142 firms and 6 individuals. OAI also removed 126 firms and 37 individuals debarred by other MDBs from ADB’s Sanctions List following their reinstatement by the respective MDBs.

In a continuing effort to streamline ADB’s Sanctions List, OAI sends a reminder to entities that have been debarred without reinstatement conditions after their minimum debarment period has lapsed and invites them to apply for reinstatement. In 2023, OAI sent reminders to 20 such entities.

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6 Includes 139 affiliates, branches, and subsidiaries.
Cross Debarments

Pursuant to the Agreement for Mutual Enforcement of Debarment Decisions,7 ADB submitted to other MDBs for cross debarment 5 firms and 2 individuals that ADB debarred, and cross debarred 82 firms and 28 individuals in line with sanctions imposed by the other MDBs.

Whistleblower Protection in the 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 2023, OAI received two complaints from whistleblowers requesting protection or confidentiality. One case did not result in any findings of retaliation, while the other case remained under investigation at year-end.

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. When an investigation finds that misconduct occurred, OAI submits an investigation report to the Budget, People, and Management Systems Department (BPMSD) for disciplinary or nondisciplinary measures.

On 1 January 2023, six investigations into ADB staff misconduct remained open, with five of these remaining under active investigation—two pertaining to integrity violations and three pertaining to other misconduct. In the sixth matter, while the investigation activities were completed, the closure process such as notifying the relevant parties of the outcome was ongoing.

During the year, OAI opened two new investigations into alleged integrity violations and 10 investigations into other misconduct.

In 2023, OAI submitted three investigation reports to BPMSD. Two investigation reports found misconduct against two staff who engaged in unprofessional conduct; both cases were originally referred to OAI by OPEC. The third investigation report found misconduct against a staff member who did not observe applicable laws and regulations and otherwise acted contrary to their responsibilities under ADB’s Code of Conduct.

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

At year-end, OAI had 14 open internal investigations, which included six cases alleging bullying and harassment; four relating to prohibited loans among staff; and one each relating to allegations of abuse of authority, conflict of interest, unsatisfactory conduct, and/or conduct otherwise not in line with ADB values.

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7 The MDBs are the African Development Bank, European Bank for Reconstruction and Development, Inter-American Development Bank, and World Bank. More details about the Cross Debarment Agreement can be found here: Cross Debarment. Agreement for Mutual Enforcement of Debarment Decisions.
BPMSD concluded its review of three OAI investigation reports submitted in 2022 and 2023 where OAI had found misconduct against three staff relating to harassment, unprofessional and disrespectful behavior, and misuse of personal information. In one case, BPMSD (i) issued a written censure to be maintained in the staff member’s personnel file for a prescribed period, (ii) made the staff member ineligible for award under the ADB recognition program for a prescribed period, and (iii) required the staff member to refrain from interacting with named individuals except when required by work and on official functions. In the other two cases, two staff separated from ADB and the disciplinary proceedings were closed.

In 2022, BPMSD remanded two investigations to OAI for further review. In 2023, OAI rescinded its finding of misconduct in these two investigations after considering additional relevant factors.

In all instances, OAI ensured that the subject staff were given full due process, allowing them sufficient time to respond meaningfully to the findings before arriving at a conclusion. Whenever feasible, 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 2023, OAI provided inputs to OPEC’s brochures on preventing sexual harassment and speaking up to report suspected integrity violations or misconduct. Additionally, OAI participated in ADB’s efforts to address domestic violence, including commenting on relevant guidelines and tool kits. OAI continues to liaise closely with OPEC regarding allegations of staff misconduct, and similarly with BPMSD and ADB’s Office of the General Counsel, as appropriate.

In all instances, OAI ensured that the subject staff were given full due process, allowing them sufficient time to respond meaningfully to the findings before arriving at a conclusion.
Integrity Risk Advisories

In support of ADB operations in 2023, OAI handled 717 integrity advisories, covering cofinancing and partnership agreements, conflicts of interest in operations and institutional contracts, contract variations for debarred and temporarily suspended entities, standard and project-specific documents, and institutional contracts (including the contractor’s complaints mechanism).

The year 2023 saw a record number of agreements reached with several UN agencies, built on efforts and lessons from prior years. Throughout the year, OAI collaborated closely with various departments within ADB. These included the operations departments; the Strategy, Policy, and Partnerships Department; the Procurement, Portfolio, and Financial Management Department; and the Office of the General Counsel. Together, they engaged in crucial dialogues with UN agencies regarding anticorruption and integrity clauses. These discussions were particularly significant for several novel financing approach projects in FCAS countries to ensure strict adherence to ADB’s Anticorruption Policy and its internal controls framework.

OAI played a significant role in the successful negotiation of key multilateral and bilateral cofinancing agreements that will enable mobilization of resources that are critical for ADB’s priorities in the areas of climate action, education, and infrastructure.8

The agricultural land under the wind power turbines in Huong Phung Commune, Huong Hoa District, Quang Tri Province, Viet Nam. ADB has implemented the Lotus Wind Power project to construct and operate three wind power farms, each boasting a capacity of 48 megawatts. During construction and operation, these farms have complied with international environmental and social standards, actively contributing to the improvement of livelihoods, gender equality, and socioeconomic development (photo by ADB).

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8 These are the legal documents and framework document for the International Finance Facility for Education, the Accreditation Master Agreement between ADB and the Green Climate Fund (First Amendment), and the Cofinancing Framework Agreement with the Asian Infrastructure and Investment Bank.
CASE STUDY 2

Office of Anticorruption and Integrity Prior Endorsement—A Crucial Requirement for Contract Variations Involving Sanctioned Entities

In 2023, an Asian Development Bank (ADB) project team belatedly requested that the Office of Anticorruption and Integrity (OAI) endorse a contract variation and/or variation order (current variation order) of a debarred firm that the executing agency had already implemented. The contract variation involved a 9% increase in cost and a third extension of time. Before this, the executing agency had approved two other extensions of time after the firm’s debarment without seeking OAI endorsement. The executing agency did not consider the contract variations as involving a “significant variation or contract amendment” and did not seek ADB approval.

Despite being given notice in OAI’s findings letter with proposed debarment, the debarred firm failed to seek OAI endorsement for the previous extensions of time and the current variation order, in violation of ADB requirements and the Integrity Principles and Guidelines.

Pursuant to the Integrity Principles and Guidelines, the matter was referred to the Investigations Division to determine if the firm had committed an integrity violation by circumventing the debarment sanction. Pending such a determination, OAI withheld endorsement of the current variation order and clarified the requirement of OAI endorsement for contract variations involving sanctioned entities with the project team.

As a result of the firm’s noncompliance, the ADB project experienced operational downtime and disruption as the ADB project team withheld processing the contract variation pending OAI determination of the integrity violation. As the request was not made before the variation order was effective and implemented, the debarred firm continued to work under its contract, and bore the risk of non-funding by ADB, should there be a finding of sanctions violation against it.

As of 31 December 2023, the complaint was undergoing further investigation.

Source: ADB (OAI).
Regional Technical Assistance Programs

OAI manages and implements three regional TA programs covering anticorruption and integrity standards, AML/CFT, and tax transparency and integrity. In 2023, the three regional TA programs continued to share knowledge and build capacity for DMCs in partnership with international partners such as the Organisation for Economic Co-operation and Development (OECD) and the Global Forum on Transparency and Exchange of Information for Tax Purposes, which benefited more than 4,300 participants (Table 2).

Capacity Building on Integrity Events

Table 2: Regional Technical Assistance Capacity-Building Sessions and Participants, 2023

<table>
<thead>
<tr>
<th>Item</th>
<th>DMC Development Partners</th>
<th>Both DMC and ADB</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sessions conducted</td>
<td>39</td>
<td>16</td>
<td>55</td>
</tr>
<tr>
<td>Participants reached</td>
<td>3,527</td>
<td>847</td>
<td>4,374</td>
</tr>
</tbody>
</table>

ADB = Asian Development Bank, DMC = developing member country.
Source: ADB (Office of Anticorruption and Integrity).

Under the regional TA, OAI organized 16 Integrity Learning Series events in 2023, reaching 847 participants primarily from implementing and executing agencies. The Integrity Learning Series comprises knowledge-sharing sessions organized by OAI to build capacity on integrity-related issues tailored to the specific needs of executing and implementing agencies.

During 9–11 May 2023, ADB and the OECD organized the 11th Regional Conference of the Anti-Corruption Initiative for Asia and the Pacific at the ADB headquarters. The conference and working groups, focusing on post-pandemic rebuilding, gathered more than 130 anticorruption policymakers, practitioners, experts, law enforcement, and private sector representatives in promoting transparency, integrity, and trust to build resilient economies.

ADB also signed a knowledge partnership agreement with the OECD to compile and share good practices to mitigate corruption and fraud risks in response to emergencies in Asia and the Pacific. Specifically, the project will research two topics related to public integrity and law enforcement: (i) promoting accountability, control, oversight, and management of economic stimulus packages and recovery funds; and (ii) strengthening law enforcement and investigation of corruption and fraud in emergency response activities. The findings will inform a regional policy response publication that will be used to build capacity in the region.

Table 2: Regional Technical Assistance Capacity-Building Sessions and Participants, 2023

The Capacity Building on Integrity regional TA seeks to increase the knowledge and capacity of ADB stakeholders in preventing and detecting integrity violations through trainings, eLearning, webinars, workshops, and conferences for ADB stakeholders in DMCs.9

9 ADB. Regional: Capacity Building on Integrity.
Anti-Money Laundering and Combating the Financing of Terrorism

The cluster regional capacity development TA, Developing Anti-Money Laundering and Combating the Financing of Terrorism Approaches, Methodologies, and Controls (or the AML regional TA), seeks to support the banking and finance sectors in ADB’s DMCs to improve the implementation of AML/CFT regulatory measures and strengthen the capacity of domestic banks and nonbank financial institutions to comply with the requirements of the Financial Action Task Force.¹⁰

In 2023, OAI assisted DMCs through this program by developing guidelines and manuals, providing policy advice, conducting capacity-building activities, and assisting on preparations for country evaluations against international standards. The AML regional TA developed AML supervisory manuals for legal professionals and accountants for the Ministry of Finance of Mongolia, and guidance notes on money laundering and terrorism financing risk assessment by real estate agents for the Financial Regulatory Commission of Mongolia. The AML regional TA also provided AML/CFT policy advice on activities relating to the mutual evaluation process by the Asia/Pacific Group on Money Laundering for the Lao People’s Democratic Republic, Marshall Islands, and Mongolia.

Enhancing Tax Transparency and Integrity

The regional TA on Enhancing Tax Transparency of ADB Developing Member Countries focuses on enhancing the capacity of DMCs to participate in international tax cooperation and adopt international tax standards, including exchange of information for tax purposes and international standards to avoid base erosion and profit shifting.¹¹

In 2023, this TA supported 21 DMCs in Asia and the Pacific to enhance domestic resource mobilization. Under the auspices of the Asia Pacific Tax Hub, OAI continued to provide virtual and in-person technical support to guide DMCs in improving their laws, regulations, and processes to combat cross-border tax evasion and aggressive forms of tax planning more effectively.

Notable highlights in 2023 included Fiji formally joining the Global Forum on Transparency and Exchange of Information for Tax Purposes, as well as the Philippines joining the OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting. As a prologue to these milestones, OAI, in close collaboration with the Public Sector Management and Governance Sector Office, played a pivotal role in assisting these DMCs to comprehensively grasp the merits and responsibilities associated with their participation in these initiatives, thereby facilitating their decision to become members.

Exchange of Information for Tax Purposes

Throughout 2023, OAI provided extensive technical support to several DMCs. This included aiding Cambodia, Georgia, and Palau in their preparation for their Global Forum on Transparency and Exchange of Information for Tax Purposes peer reviews, as well as assisting Armenia and Mongolia in strengthening their information security systems to receive and maintain treaty-protected data. OAI further conducted experience-sharing workshops on effective compliance regimes related to automatic exchange of financial account information and how to utilize data received via automatic exchange of information. Moreover, OAI provided tax auditor training in July 2023 for the Philippines, focusing on the utilization of exchange of information in tax audits.

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¹⁰ ADB. Regional: Developing Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) Approaches, Methodologies, and Controls.

¹¹ ADB. Regional: Enhancing Tax Transparency of ADB Developing Member Countries.
Furthermore, in July 2023, OAI held beneficial ownership training in collaboration with the Global Forum on Transparency and Exchange of Information for Tax Purposes at the ADB headquarters, which was attended by 31 senior officials from 18 jurisdictions, including 14 DMCs.

**Base Erosion and Profit Shifting**

To stop revenue leakages through aggressive cross-border tax planning strategies resulting in base erosion and profit shifting, OAI delivered capacity-building workshops on the base erosion and profit shifting minimum standards and transfer pricing for Fiji, the Kyrgyz Republic, the Philippines, Thailand, and Viet Nam.
A workshop on tax treaty guidelines was also conducted for Armenia in December 2023. OAI also provided support to Cambodia, Indonesia, Papua New Guinea, and Thailand to build capacity on the two-pillar solution to address the challenges arising from the taxation of the digital economy. Together with the World Bank, OAI cohosted an international taxation workshop as part of a G20 Presidency initiative attended by 41 tax officials from 18 DMCs.

In November 2023, OAI held a regional consultation on international tax matters for Asia and the Pacific at the ADB headquarters. Over 125 senior tax officials from 39 jurisdictions, including 33 DMCs and 4 regional and international organizations, attended this hybrid event. The event built on the outcomes of the previous regional consultations for Asia and the Pacific, providing updates on the progress of the two-pillar solution to address the tax challenges of the digitalization of the economy and other international tax priorities, such as the restructuring of tax incentives and value-added tax on e-commerce.
We act with integrity

Through its unwavering commitment to integrity, ADB strives to empower communities by supporting farmers to produce high-quality crops, providing access to quality education, improving health care, and ensuring equitable access to energy sources (photos by ADB).
Knowledge Sharing and Outreach

In 2023, OAI developed and shared knowledge products 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. OAI also organized or participated in knowledge-sharing events to disseminate integrity-related information on ADB and international standards.

Knowledge Products

Publications
In the first half of 2023, OAI released six knowledge products: Integrity Risks and Red Flags in Projects, a new publication series covering the energy; education; agriculture, natural resources, and rural development; water; transport; and health sectors.

OAI published the brochure Enhancing Tax Transparency in Asia and the Pacific, which provides an overview of how ADB is helping its members enhance tax transparency and counter tax evasion and aggressive tax planning.

OAI also published the article on Stronger Partnership to Prevent Corruption during Crises and the summary report on Identifying Red Flags and Mitigating Integrity Risks in Projects, which discusses lessons on mitigating integrity risks.

To share learning materials from OAI-led events in 2023, 14 new online pages were developed for participants and the interested public, with 11 of these new pages for the Integrity Learning Series.

Videos
In 2023, OAI produced six knowledge-sharing videos, including the OAI 2022 Annual Report highlights, #IntegrityByTheNumbers—Episode 7: Complaints and Investigations (July–December 2022), and #IntegrityByTheNumbers—Episode 8: Prevention and Compliance (July–December 2022).

Two episodes of iACT iTalk, a video series delivering insights from integrity champions, feature Heidi Mendoza, former undersecretary general for the UN Office of Internal Oversight, and Torplus Yomnak of the Anti-Corruption Organization of Thailand.


iACT iTalk video series. iACT iTalk features insights from anticorruption and integrity champions. In 2023, OAI produced episodes with Torplus Yomnak and Heidi Mendoza (photo by Ryan Justin Dael, ADB).
Knowledge-Sharing Events

OAI conducted 29 knowledge-sharing sessions in 2023. These sessions comprised 25 synchronous sessions and 4 eLearning courses. The knowledge-sharing sessions cumulatively reached an audience of more than 1,500 DMC representatives and ADB personnel (Table 3), of which 323 were eLearning participants.

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

<table>
<thead>
<tr>
<th>Item</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>4</td>
<td>21*</td>
<td>4</td>
<td>29</td>
</tr>
<tr>
<td>Participants reached</td>
<td>475</td>
<td>744*</td>
<td>323</td>
<td>1,542</td>
</tr>
</tbody>
</table>

ADB = Asian Development Bank, DMC = developing member country.
* Includes three sessions for 40 participants that were conducted by the regional technical assistance for capacity building on integrity.

Source: ADB (Office of Anticorruption and Integrity).

OAI’s eLearning courses Anticorruption and Integrity at ADB, which is mandatory for ADB staff; Combating Money Laundering and Terrorist Financing; and the bank’s first gamified eLearning course—Are You an Integrity Champion?—continued to run for both ADB and external learners. Detecting and Preventing Integrity Violations in ADB Projects: An Online Course for Executing and Implementing Agencies was launched in 2023.

Asia Pacific Anticorruption and Integrity Forum Co-organized with the Xiamen National Accounting Institute

On 29–31 August 2023, the Xiamen National Accounting Institute and ADB organized the Asia Pacific Anticorruption and Integrity Forum in Xiamen, People’s Republic of China (PRC). The forum’s objective was to raise awareness among PRC contracting entities and government bodies of the importance of sound integrity risk management practices and adherence to ADB standards in public procurement, asset and financial management, and environmental and social safeguards, for the successful participation and delivery of outputs in ADB projects.

With 254 participants, including senior representatives from ADB, the Asian Infrastructure and Investment Bank, PRC companies, and the Xiamen National Accounting Institute, the event demonstrated how MDBs and PRC companies could mutually learn from shared experiences to further knowledge and understanding on anticorruption and integrity issues.

Green Climate Fund Integrity Forum

Recognizing how corruption threatens climate finance, OAI represented ADB at the Second Integrity Forum of the Green Climate Fund (GCF) held in Bangkok in September 2023. Focused on the theme “Partnering for Integrity in Climate Action,” ADB and other development partners shared experiences, knowledge, and best practices on various topics such as integrity within climate-financed projects, conflict of interest, proactive integrity reviews, and business integrity programs with delegates from 35 GCF Direct Access Entities from across the globe, including those from ADB’s DMCs.
OAI also explored future collaboration with the GCF’s Independent Integrity Unit in developing tailored capacity-building measures. These are aligned with ADB’s goals as the climate bank for Asia and the Pacific and the restatement of ADB–GCF’s Accreditation Master Agreement in July 2023 that allows ADB to continue accessing GCF funds to support its climate mitigation and adaptation initiatives in the region.

Conference of International Investigators

In November 2023, OAI participated in the Conference of International Investigators, hosted by the European Bank for Reconstruction and Development at its headquarters in London. During this annual conference, 58 international organizations discuss integrity issues and address common challenges in responding to fraud and corruption in their programs. ADB chaired and participated in panels on conducting investigations in fragile states, providing whistleblower protection, and incorporating artificial intelligence into investigations. ADB will host the Conference of International Investigators at its headquarters in November 2024.

Appendix 6 lists the knowledge products and services produced by OAI in 2023.

International Anticorruption Day

ADB marked International Anticorruption Day, with the theme “Green and Clean: Protecting Climate Finance from Corruption.” OAI launched an interactive exhibit on 5 December 2023 and held a knowledge-sharing session on 7 December 2023. More than 180 people attended the in-person event.

ADB–Green Climate Fund agreement. On 14 July 2023, ADB and Green Climate Fund signed the Agreement on Climate Funds Access (photo by ADB).
“As the climate bank for Asia and the Pacific, ADB has raised its ambition to provide $100 billion in cumulative climate finance from 2019 to 2030. As we pursue this ambition, we must remain vigilant, so that fraud and corruption do not undermine our efforts.”

Masatsugu Asakawa
ADB President

“To cure fraud and corruption, transparency is often the best remedy.”

John Versantvoort
OAI Head

“Climate finance is the cornerstone of our global strategy to combat climate change. The Asian Development Bank has been at the forefront, committing to ambitious climate investment targets for 2030. The success of such initiatives, however, hinges on the assumption that every dollar is used as intended: to create a sustainable and resilient future for all...”

Bradley Hope
New York Times bestselling co-author, Pulitzer Prize finalist, and former reporter for The Wall Street Journal
APPENDIX 1

Proactive Integrity Review Processes

The Office of Anticorruption and Integrity conducts proactive integrity reviews on ongoing sovereign projects to assess key integrity risks and provide recommendations to strengthen integrity risk management. Special proactive integrity reviews are similar to proactive integrity reviews with respect to execution and evaluation phases but have the added flexibility of determining the thematic nature, scope, and timing of an assessment.

Review outcomes further bolster project stakeholders’ accountability and control over processes, improve transparency, and foster fairness in procurement processes. Figure A1 depicts the proactive integrity review process.

Figure A1: Proactive Integrity Review Process Flow

<table>
<thead>
<tr>
<th>Define</th>
<th>Plan</th>
<th>Execute</th>
<th>Report</th>
<th>Evaluate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identify emerging risks</td>
<td>Conduct due diligence</td>
<td>Execute and periodically recalibrate work program</td>
<td>Draft preliminary conclusion memo and/or report and circulate to relevant stakeholders for comments</td>
<td>Assess execution and results against key performance indicators</td>
</tr>
<tr>
<td>Determine review focus</td>
<td>Identify and assess risks</td>
<td>Conduct due diligence, as needed</td>
<td>Incorporate feedback received</td>
<td>Reevaluate strategy</td>
</tr>
<tr>
<td>Collect relevant data</td>
<td>Develop work program (i.e., scope, sample review procedures)</td>
<td>Conduct risk assessment, as needed</td>
<td>Issue conclusion memo and/or report</td>
<td>Enhance overall strategy and work program to replicate in similar PIRs</td>
</tr>
<tr>
<td>Design review strategy (i.e., approach and report outputs)</td>
<td></td>
<td>Document results</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Determine key performance indicators</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

PIR = proactive integrity review. Source: Asian Development Bank (Office of Anticorruption and Integrity).
### APPENDIX 2

#### Highlights of Proactive Integrity Review Reports Issued in 2023

<table>
<thead>
<tr>
<th>Project</th>
<th>Review Highlights</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Supply and Sanitation Sector Project: Special Proactive Integrity Review (Lao People’s Democratic Republic)</td>
<td>OAI’s review of the PCU’s FMD processes determined that controls were generally in place to mitigate key integrity risks. However, OAI noted inadequate accounting system controls and insufficient implementation of ADB’s integrity requirements and recommended that the PCU seek technical assistance to enhance its FMD controls. Further, OAI advised ADB and the executing agency to organize anticorruption and integrity training for the PCU finance team to strengthen the application of integrity controls in FMD processes.</td>
</tr>
</tbody>
</table>
| Health System Enhancement to Address and Limit COVID–19: Special Proactive Integrity Review (Philippines) | OAI evaluated key integrity risks in the project’s contract and asset management processes. Although controls were generally in place, the review identified the following issues impacting integrity:  
  - deficient performance security,  
  - gaps in progress reporting, and  
  - lack of access to ADB’s complete Sanctions List.  
To mitigate the identified integrity risks, OAI recommended that the project implementation unit enhance contractors’ compliance with performance security requirements, strengthen project monitoring and reporting, and implement procedures for checking ADB’s complete Sanctions List at required contract milestones. |
| Skills for Employment Investment Program—Tranche 2: Follow-Up Review of Proactive Integrity Review Recommendations (Bangladesh) | OAI assessed the implementation status of 23 recommendations relating to the 2019 PIR findings. The follow-up review determined that the implementing agency had continuously improved its controls. However, the areas noted below required the implementing agency’s further action to mitigate residual integrity risks:  
  - selection and accountability of PTCs, monitoring over PTC activities;  
  - validation of key training information linked to project payments;  
  - compliance of PTCs to specific financial management requirements; and  
  - conflict of interest management.  
OAI recommended further control enhancements, including updating and implementing memoranda of understanding templates, carrying out procedural enhancements in trainee registration, and undertaking substantive implementing agency monitoring visits and review of supporting documents. |

continued on next page
### Rajasthan State Highway Investment Program – Tranche 2: Special Proactive Integrity Review (India)

OAI noted that controls were generally adequate to mitigate integrity risks in key phases of the executing agency’s procurement process. However, the following areas required enhancements to adequately mitigate integrity risks:

- lapses in the bid evaluation,
- lack of access to ADB’s complete Sanctions List, and
- absence of protocols to assess and escalate integrity-related complaints or violations.

OAI recommended for the executing agency and ADB to (i) organize targeted trainings for BEC members and enhance controls to apply the lessons learned from the trainings; (ii) gain access to and check ADB’s complete Sanctions List; and (iii) require its personnel to assess whether complaints received include allegations of integrity violations and, if so, to refer those to OAI.

### Chhattisgarh Road Connectivity Project: Special Proactive Integrity Review (India)

The review examined key areas in the executing agency’s procurement process and established that controls to mitigate primary integrity risks were generally adequate and in line with ADB requirements. However, the following areas required enhancements to adequately mitigate integrity risks:

- failure to detect errors and red flags during bid evaluation,
- inconsistent notice to ADB on bid evaluation matters requiring its prior review,
- absence of protocols to report integrity complaints, and
- lack of access to ADB’s complete Sanctions List.

OAI recommended for the executing agency and ADB to conduct targeted procurement training for BEC members; and for the executing agency to comply with ADB’s review process for specific procurement documents and decisions, reporting of allegations of integrity violations, and Sanctions List checking.

### Karnataka State Highways Improvement III Project: Special Proactive Integrity Review (India)

OAI noted that controls were generally adequate to mitigate integrity risks in key activities of the executing agency’s procurement process. However, the following areas required enhancements to adequately mitigate integrity risks:

- inconsistent application of evaluation criteria for expressions of interest,
- lack of access to ADB’s complete Sanctions List, and
- absence of protocols to assess and escalate integrity-related complaints or violations.

OAI recommended for the implementing agency to (i) ensure that requests for expression of interest contain clear instructions on the submission requirements; (ii) gain access to and check ADB’s complete Sanctions List; and (iii) require its personnel to assess whether complaints received include allegations of integrity violations and, if so, to refer those to OAI.

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**Source:** ADB (OAI).
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 A3.1).

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 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 appropriate remedial actions (Figure A3.2).

If an internal investigation finds that an ADB 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 nondisciplinary action is warranted against the ADB staff member. Where there is no finding of misconduct, the case is closed (Figure A3.3).

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), Administrative Order 2.02 (2022), Administrative Order 2.04 (2020), and Administrative Order 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: ADB (OAI).
**Figure A3.2: Process of External Investigation**

1. **OAI investigates the allegation.**
   - Caution
   - Reprimand
   - Is there a finding?
     - Y: OAI presents its investigative findings to subjects of interest.
   - N: Investigation closed

2. **Subject of interest accepts OAI’s findings?**
   - Y: OAI proposes a sanction
     - Accepted?
     - Y: Sanction is subject to appeal before the Sanction Appeals Committee
       - Sanction lifted or reduced
       - Investigation closed
     - N: Sanction upheld
       - Returned to OAI for reinvestigation
       - Investigation closed
   - N: OAI refers its investigative findings to IOC.

**Figure A3.3: Process of Internal Investigation**

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

2. **In consultation with OGC, BPMSD reviews OAI’s report and takes measures in accordance with ADB’s AO 2.04: Disciplinary Measures and Procedures**

3. **Decision is subject to administrative review and appeal.**

ADB = Asian Development Bank; 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 (2020), 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 an ADB staff initiates an administrative review of BPMSD’s decision, the review and appeal will be in accordance with AO 2.06 (2020).

Source: ADB (OAI).
APPENDIX 4
Examples of Office of Anticorruption and Integrity Complaints Closed in 2023

<table>
<thead>
<tr>
<th>Disposition and Summary</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>The complaint alleged that members of a municipal government project management office were involved in corrupt and fraudulent practices, including data manipulation, falsification of reports, and financial impropriety. OAI determined that the complaint lacks evidence and specific information, such as the names of the individuals involved and their respective actions, to support the allegations. The complainant also failed to respond to OAI’s multiple requests to provide additional details. The case was closed because the complaint is not credible.</td>
<td>Closing notices were sent to the complainant and the ADB project officer, and no further action was required.</td>
</tr>
<tr>
<td>The complaint alleged that a debarred entity violated its sanction when it submitted a bid for an ADB-financed contract. OAI determined that the debarred entity did not participate in the procurement process, only its affiliate. Moreover, the debarment did not extend to the entity’s affiliate(s). As such, the sole participation by the affiliate in the procurement process is permitted. The case was closed because the complaint is not credible.</td>
<td>Closing notices were sent to the complainant and the ADB project officer, and no further action was required.</td>
</tr>
<tr>
<td>The complaint alleged that executing agency staff committed a corrupt practice when they asked a consulting firm for a kickback to release due payments under the contract. OAI determined that the complaint lacks evidence and specific information, such as the names of the individuals involved and their respective actions, to support the allegations. Moreover, OAI determined that the underlying issues related to the consulting firm’s performance, which were resolved with ADB oversight with payments agreed based on output. The case was closed because the complaint is not credible.</td>
<td>Closing notices were sent to the complainant and the ADB project officer, and no further action was required.</td>
</tr>
</tbody>
</table>

continued on next page
<table>
<thead>
<tr>
<th>Disposition and Summary</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Not Verifiable</strong></td>
<td></td>
</tr>
<tr>
<td>A self-disclosed complaint alleged that a subconsultant of a consulting firm engaged on an ADB-financed contract was approached by unnamed individuals who attempted to solicit payments to ensure the award of a consulting contract. Neither the subconsultant nor the consulting firm agreed to make any payments. OAI determined that the complaint lacks clarity of required information, such as the names of the individuals involved in the alleged solicitation. The case was closed because the complaint is not verifiable.</td>
<td>Closing notices were sent to the consulting firm and the subconsultant, and no further action was required.</td>
</tr>
<tr>
<td>The complaint alleged that the selected firm for an ADB-financed contract and the officials of the implementing agency engaged in corrupt practices as the firm allegedly transferred money to the officials. While the complaint appears to be credible given the accuracy of the procurement details provided, OAI determined that the case was not verifiable because of lack of specific information on the alleged transfer of money and the secretive nature of bribery.</td>
<td>Closing notices were sent to the complainant and the ADB project officer, and no further action was required.</td>
</tr>
<tr>
<td>The complaint alleged a potential scam of an email to ADB requesting a wire transfer, for the attention of a named individual and purportedly sent from the ADB President. OAI determined that the identity of the complainant is also identified by the same e-mail address used on the scam e-mail. The complaint did not confirm if the matter was reported as a scam attempt, nor did they request ADB to investigate. OAI requested further information and advised the complainant that the e-mail was not from ADB or the ADB President. OAI did not receive a reply. Given the lack of clarity, the case was closed because the complaint is not verifiable.</td>
<td>Closing notice was given to the ADB staff member who referred the matter to OAI, and no further action was required.</td>
</tr>
<tr>
<td><strong>Outside Mandate</strong></td>
<td></td>
</tr>
<tr>
<td>An anonymous complaint alleged financial irregularities and corrupt practices by companies associated with a private equity fund with ADB investment. OAI determined that ADB funds were not used to invest in the private equity fund, and that the specific fund has taken steps to conduct an independent investigation of these internal matters. The case was closed because the complaint is outside ADB’s mandate.</td>
<td>Closing notice was sent to the ADB project officer requesting for OAI to be informed if ADB makes an investment in the private equity fund, and that they share the internal investigation report.</td>
</tr>
</tbody>
</table>

continued on next page
### Disposition and Summary

| The complaint alleged a possible sanction violation of an ADB debarred entity as its potential affiliate who participated as a subconsultant in a procurement financed by another multilateral development bank. |
| OAI confirmed that the affiliate is also an ADB-sanctioned entity; however, the bid submission was not for an ADB-financed contract. |
| The case was closed because the complaint is outside ADB’s mandate. |

| The complaint alleged that an implementing agency wrongfully and deliberately terminated a firm’s contract under an ADB-financed project. |
| OAI determined that there were no integrity issues relevant to the contract termination. The implementing agency presented the justifications for the contract termination, which ADB reviewed and provided no objection to. |
| The case was closed because the complaint is outside ADB’s mandate as the concern is contractual in nature. |

### Other Relevant Considerations

| The complaint alleged that personnel of an investee firm of a private equity fund that ADB invested in failed to disclose conflict of interest. |
| OAI determined that the investee firm, through a third party, conducted inquiries into the matter and imposed remedial actions on the personnel, as approved by the board of the equity fund. |
| Considering the remedial measures taken by the investee firm and equity fund, OAI closed the case based on other relevant considerations, with an issuance of caution to the investee firm. |

| The complaint of an executing agency’s findings alleged that a firm engaged under an ADB-financed contract paid illegal gratification and unofficial payments to various government authorities and included such expenditures in its claim under the contract. |
| OAI confirmed that the firm’s claim included payments and gratuities to government personnel potentially for the firm’s benefit. |
| However, the case was closed based on other relevant considerations because the executing agency had already taken corrective action, the amount involved was low, and these were historical claims. |

### Action

| Closing notice was sent to the multilateral development bank providing information relevant to the sanctioned entities, and no further action was required. |
| Closing notices were sent to the complainant and the ADB project officer, and no further action was required. |
| Closing notices were issued to the complainant and ADB project officer. OAI issued a caution to the investee firm putting it on notice of its future conduct by relaying that the personnel’s actions are not acceptable to ADB and advising it to prevent and mitigate the risk of recurrence by implementing appropriate, broader internal controls. |
| OAI issued a reprimand to the firm, putting it on notice of ADB’s expectations of its future conduct. A closing notice was sent to the ADB project officer advising of OAI’s findings and reprimand to the firm, and to update the executing agency. |

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### Disposition and Summary

<p>| | |</p>
<table>
<thead>
<tr>
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<tbody>
<tr>
<td>A complaint sought OAI’s confirmation on whether a document requesting a facilitation payment to release funds was legitimately issued by ADB as it contained ADB’s name and logo and was purportedly signed by an ADB staff member.</td>
<td>OAI confirmed the scam attempt and advised the complainant not to engage with the sender of the document as ADB does not issue certificates of deposit. Because of limited information, the scammer’s information could not be included on ADB’s scam advisory page. The case was closed based on other relevant considerations.</td>
</tr>
<tr>
<td>OAI confirmed said transfer and noted that ADB immediately requested corrective action from the fund. The transaction was reversed, and the funds were fully recovered. The executive director was dismissed from service and is subject to a state-led investigation.</td>
<td>The complaint ceased to be material to warrant further investigation.</td>
</tr>
<tr>
<td>The complaint alleged misrepresentation by a firm that provided false corporate and address information of their 2014 bid for an ADB-financed contract, and that a previous corruption case identified the firm’s address as a student dormitory and coffee shop.</td>
<td>Closing notices were sent to the complainant and ADB project officer, and no further action was required.</td>
</tr>
</tbody>
</table>

### Not Material

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<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>A complaint alleged that there was a state-led investigation of corruption involving a government credit guarantee fund that received funds from an ADB loan and on which an executive director processed an unauthorized transfer of about $1.5 million from a project subaccount to an unauthorized account.</td>
<td>No further action was required.</td>
</tr>
<tr>
<td>OAI confirmed that the firm’s address, as recorded on a 2022 site visit by a partner organization, is the same address used by the firm in the 2014 bid for an ADB-financed contract. Given the historical bid submission in 2014, the limited exposure to the firm, and the fact that the loan was closed in 2018, the complaint ceased to be material to warrant further investigation.</td>
<td></td>
</tr>
</tbody>
</table>

**ADB = Asian Development Bank, OAI = Office of Anticorruption and Integrity.**

*Source: ADB (OAI).*
## APPENDIX 5

### Examples of External Investigations with Remedial Actions in 2023

<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 determined that a firm was negligent when it failed to verify the correctness of information in documents submitted for an ADB contract.</td>
<td>OAI reminded the firm that it is responsible for ensuring the accuracy and authenticity of information and documents in its bids, including curricula vitae of experts proposed by its joint venture partners.</td>
</tr>
<tr>
<td>OAI found that the firm failed to conduct sufficient due diligence on its joint venture partner, which submitted altered financial statements in its bid.</td>
<td>The firm was cautioned and reminded that it (i) is responsible for ensuring that due diligence is conducted on firms and/or individuals that it may want to engage in future ADB projects, and (ii) has the obligation to respond to all OAI inquiries.</td>
</tr>
<tr>
<td><strong>Reprimand</strong></td>
<td></td>
</tr>
<tr>
<td>OAI established that a firm submitted a curriculum vitae of an expert that contained false information misrepresenting the expert’s qualifications. However, OAI determined that the integrity violation committed by the firm was minor and an isolated incident of lack of oversight by the firm.</td>
<td>OAI recommended that the firm review its bid preparation process and implement adequate controls to ensure that accurate information and genuine documents are submitted in its bids for ADB projects.</td>
</tr>
<tr>
<td>OAI also considered the executing agency’s timely identification of the inaccuracies in the curriculum vitae of the expert that resulted in the firm’s disqualification from the bid.</td>
<td></td>
</tr>
<tr>
<td>OAI found that a firm’s sanction violation and misrepresentation of eligibility when it submitted a bid for an ADB project while cross debarred were because of its lack of oversight rather than a deliberate act.</td>
<td>The firm was reprimanded with a reminder that it remains cross debarred by ADB until it is released from the World Bank debarment.</td>
</tr>
<tr>
<td>OAI determined that the firm’s acts were mitigated by (i) its responsiveness to OAI’s inquiries during the investigation, (ii) the admission of its mistake in participating in the procurement for the package, (iii) the remedial actions undertaken by the firm against the involved employees, (iv) corrective measures instituted to avoid the recurrence of a sanctions violation in the future, and (v) the fact that no harm was caused to the project. In addition, the acts did not result in a gain to the firm, as its bid was rejected by the executing agency.</td>
<td></td>
</tr>
</tbody>
</table>

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Remedial Action and Findings

<table>
<thead>
<tr>
<th>Proposed Debarment</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>OAI found that a firm engaged in fraudulent practice by submitting fraudulent compliance test certificates to meet the bid requirements for two ADB-financed contracts.</td>
<td>The firm accepted ADB’s proposed debarment of 2 years. The debarment extends to the firm’s branches and subsidiaries.</td>
</tr>
<tr>
<td>OAI’s investigation determined that a firm violated its sanction for a second time and engaged in a fraudulent practice when it submitted a bid for a contract while still debarred by ADB.</td>
<td>The firm accepted a conditional non-debarment including associated conditions for 2 years, subject to early reinstatement after completing a minimum period of 18 months.</td>
</tr>
<tr>
<td>Following an investigation by OAI, a firm accepted that it had engaged in fraudulent practice when it misrepresented its work experience through the submission of a fraudulent work certificate in its bid for an ADB-financed project.</td>
<td>The firm cooperated with the investigation and accepted a 2-year debarment, with the possibility of early reinstatement subject to the fulfillment of certain conditions set by OAI. The debarment extends to the firm’s subsidiaries and branches.</td>
</tr>
<tr>
<td>OAI received allegations that a joint venture had submitted falsified documents in its bid for an ADB contract. OAI’s investigation established that the lead firm of the joint venture had falsified the work experience certificates of the partner firm for the joint venture to appear to be responsive to the bid requirements of the contract. OAI also found that the lead firm, through its director and bid representative of the joint venture, had attempted to cover up the original fraud by submitting another falsified certification from the purported employer. OAI considered the level of concealment as an aggravating factor to the sanction in determining the proposed 4-year debarment with conditional reinstatement.</td>
<td>The firm and its director accepted OAI’s findings of fraudulent practice and the proposed minimum debarment period of 4 years, subject to reinstatement after compliance with reinstatement conditions. The debarred parties and their related entities are ineligible to participate in ADB-related activities while debarred.</td>
</tr>
</tbody>
</table>

IOC Debarment

<table>
<thead>
<tr>
<th>IOC Debarment</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>OAI’s investigation established that a firm engaged in multiple integrity violations under two ADB projects by (i) violating an ADB sanction when it participated in a bid with a joint venture partner that was debarred from participating in any ADB-related activity, and (ii) committing fraudulent practice when it submitted falsified work experience documents in a bid for an ADB-financed contract.</td>
<td>The IOC concurred with OAI’s findings of a sanction violation and fraudulent practice and debarred the firm for 4 years for engaging in multiple integrity violations. The firm’s debarment period commenced from the date of its temporary suspension on 22 December 2022.</td>
</tr>
<tr>
<td>ADB’s IOC concurred with OAI’s findings that a firm engaged in fraudulent practice in its bid for an ADB-financed contract.</td>
<td>The IOC considered the firm’s failure to cooperate with OAI’s investigation an aggravating factor and debarred the firm for 4 years.</td>
</tr>
</tbody>
</table>

The IOC determined that the firm had submitted misrepresentations and falsified documents in response to the executing agency’s requests for information during the bid evaluation.

ADB = Asian Development Bank, IOC = Integrity Oversight Committee, OAI = Office of Anticorruption and Integrity.
Source: ADB (OAI).
### APPENDIX 6

**Knowledge Products and Services Developed in 2023**

<table>
<thead>
<tr>
<th>Category</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Article</td>
<td>Identifying Red Flags and Mitigating Integrity Risks in Projects</td>
</tr>
<tr>
<td>Article</td>
<td>Stronger Partnership to Prevent Corruption during Crises</td>
</tr>
<tr>
<td>Newsletter</td>
<td>Integrity eBulletin Issue No. 61</td>
</tr>
<tr>
<td>Newsletter</td>
<td>Integrity eBulletin Issue No. 62</td>
</tr>
<tr>
<td>Newsletter</td>
<td>Integrity eBulletin Issue No. 63</td>
</tr>
<tr>
<td>Newsletter</td>
<td>Integrity eBulletin Issue No. 64</td>
</tr>
<tr>
<td>Publication</td>
<td>Enhancing Tax Transparency in Asia and the Pacific</td>
</tr>
<tr>
<td>Publication</td>
<td>Integrity Risks and Red Flags in Agriculture, Natural Resources, and Rural Development Projects</td>
</tr>
<tr>
<td>Publication</td>
<td>Integrity Risks and Red Flags in Education Projects</td>
</tr>
<tr>
<td>Publication</td>
<td>Integrity Risks and Red Flags in Energy Projects</td>
</tr>
<tr>
<td>Publication</td>
<td>Integrity Risks and Red Flags in Health Projects</td>
</tr>
<tr>
<td>Publication</td>
<td>Integrity Risks and Red Flags in Transport Projects</td>
</tr>
<tr>
<td>Publication</td>
<td>Integrity Risks and Red Flags in Water Projects</td>
</tr>
<tr>
<td>Publication</td>
<td>Speak Up! Guide to Safely Reporting Suspected Integrity Violations or Misconduct</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>Category</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Report</td>
<td>Office of Anticorruption and Integrity: 2022 Annual Report</td>
</tr>
<tr>
<td>Report</td>
<td>Office of Anticorruption and Integrity: 2022 Annual Report Highlights Brochure</td>
</tr>
<tr>
<td>Speech</td>
<td>Beneficial Ownership Seminar and Exchange of Information on Request Assessor Training (Lisa Kelaart-Courtney, Advisor, OAI)</td>
</tr>
<tr>
<td>Video</td>
<td>#IntegrityByTheNumbers – Episode 7: Complaints and Investigations (July–December 2022)</td>
</tr>
<tr>
<td>Video</td>
<td>#IntegrityByTheNumbers – Episode 8: Prevention and Compliance (July–December 2022)</td>
</tr>
<tr>
<td>Video</td>
<td>iACT iTalk – Episode 16: Citizen Engagement, Open Data, and Anticorruption</td>
</tr>
<tr>
<td>Video</td>
<td>iACT iTalk – Episode 17: Multilateral Development Banks and Supreme Audit Institutions</td>
</tr>
<tr>
<td>Video</td>
<td>International Anticorruption Day 2023: Protecting Climate Finance</td>
</tr>
<tr>
<td>Video</td>
<td>Office of Anticorruption and Integrity: 2022 Annual Report Highlights</td>
</tr>
<tr>
<td>Website</td>
<td>11th Regional Conference of the Anti-Corruption Initiative for Asia and the Pacific</td>
</tr>
<tr>
<td>Website</td>
<td>Asia Pacific Anticorruption and Integrity Forum</td>
</tr>
<tr>
<td>Website</td>
<td>International Anticorruption Day 2023—Green and Clean: Protecting Climate Finance from Corruption</td>
</tr>
<tr>
<td>Website</td>
<td>Integrity Learning Series (11 learning event sites)</td>
</tr>
</tbody>
</table>

OAI = Office of Anticorruption and Integrity.
Source: Asian Development Bank (OAI).
### Table A6.2: Office of Anticorruption and Integrity Knowledge Services Summary, 2023

<table>
<thead>
<tr>
<th>Category</th>
<th>Title</th>
<th>Audience</th>
<th>No. of Session(s)</th>
<th>No. of Participant(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>eLearning</td>
<td>Anticorruption and Integrity in ADB</td>
<td>ADB personnel and external</td>
<td>1</td>
<td>299</td>
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<tr>
<td>eLearning</td>
<td>Are You an Integrity Champion?</td>
<td>ADB personnel and external</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>eLearning</td>
<td>Combating Money Laundering and Terrorist Financing</td>
<td>ADB personnel and external</td>
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<td>7</td>
</tr>
<tr>
<td>eLearning</td>
<td>Detecting and Preventing Integrity Violations in ADB Projects</td>
<td>ADB personnel and external</td>
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<td>13</td>
</tr>
<tr>
<td>Workshop or Seminar</td>
<td>ADB Anticorruption Policy: A Briefer for Project Implementing Agencies</td>
<td>External</td>
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<td>13</td>
</tr>
<tr>
<td>Workshop or Seminar</td>
<td>Asia Pacific Anticorruption and Integrity Forum</td>
<td>External</td>
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<td>254</td>
</tr>
<tr>
<td>Workshop or Seminar</td>
<td>G20 Anti-Corruption Working Group Meeting</td>
<td>External</td>
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<td>154</td>
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<tr>
<td>Workshop or Seminar</td>
<td>GCF Integrity Forum Bangkok: Partnering for Integrity in Climate Action</td>
<td>External</td>
<td>1</td>
<td>54</td>
</tr>
<tr>
<td>Workshop or Seminar</td>
<td>iACT iLearn: OAI Knowledge-Sharing Series</td>
<td>ADB personnel</td>
<td>3</td>
<td>152</td>
</tr>
<tr>
<td>Workshop or Seminar</td>
<td>Various workshops for ADB staff, consultants, and contractors</td>
<td>ADB personnel</td>
<td>18</td>
<td>592</td>
</tr>
<tr>
<td>Workshop or Seminar</td>
<td>Various workshops under RETA 9433</td>
<td>External</td>
<td>37</td>
<td>3,443</td>
</tr>
<tr>
<td>Workshop or Seminar</td>
<td>Various workshops under RETA 9703</td>
<td>ADB personnel and external</td>
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<td>847</td>
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<tr>
<td>Workshop or Seminar</td>
<td>Various workshops under RETA 9706</td>
<td>External</td>
<td>2</td>
<td>84</td>
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<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td><strong>84</strong></td>
<td><strong>5,916</strong></td>
</tr>
</tbody>
</table>

ADB = Asian Development Bank, GCF = Green Climate Fund, OAI = Office of Anticorruption and Integrity, RETA = regional technical assistance. Source: ADB (OAI).
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
E-mail integrity@adb.org or anticorruption@adb.org
Web www.adb.org/integrity

Connect with us on social media:
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@anticorruptionandintegrity
@ADB_OAI
ADB Integrity
This report outlines the accomplishments of the Asian Development Bank’s Office of Anticorruption and Integrity (OAI) during 2023. It describes OAI’s role in leading integrity risk management initiatives through its prevention and compliance function and its investigation and enforcement activities. During the year, OAI’s work encompassed, among others, proactive integrity reviews, integrity due diligence, and integrity violation and misconduct investigations. The report also highlights OAI’s provision of regional technical assistance covering anticorruption and integrity standards, anti-money laundering and combating the financing of terrorism, and tax transparency and integrity, as well as OAI’s capacity-building, knowledge-sharing, and outreach activities.

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.