

Notice of Uncontested Sanctions Proceedings

July 29, 2025

**Sanctions Case No. 798
IDA Credit Number 5031-VN
IDA Credit Number 6071-VN
(Viet Nam Medium Cities Development Project)**

**Respondent:
Thi Son Company Limited**

1. On April 24, 2025, the World Bank's Chief Suspension and Debarment Officer (the "SDO") issued a Notice of Sanctions Proceedings (the "Notice") to Thi Son Company Limited (the "Respondent") pursuant to sub-paragraph 4.1(a) of Section III.A of the *Bank Procedure: Sanctions Proceedings and Settlements in Bank Financed Projects* issued by the Bank on November 30, 2023 (the "Sanctions Procedures").
2. The Statement of Accusations and Evidence (the "SAE") prepared by the Bank's Integrity Vice Presidency ("INT") and appended to the Notice contained INT's accusation that the Respondent engaged in a Sanctionable Practice (as defined in the Sanctions Procedures) in connection with the above-named project (the "Project"). The SAE also contained the evidence gathered by INT in support of this accusation.
3. The specific accusation made by INT in the SAE was that the Respondent engaged in an obstructive practice by refusing to provide the Bank with certain requested documents with an intent to materially impede the exercise of the Bank's inspection and audit rights in connection with the Project.
4. Based on a review of INT's SAE conducted in accordance with sub-paragraph 4.1(a) of Section III.A of the Sanctions Procedures, and pursuant to sub-paragraph 4.1(c), sub-paragraph 9.1, and sub-paragraph 9.4 of Section III.A of the Sanctions Procedures, with due consideration of the factors set forth in sub-paragraph 9.2 of Section III.A of the Sanctions Procedures and in the World Bank Group Sanctioning Guidelines, the SDO recommended in the Notice that the Respondent, together with certain Affiliates (as defined in the Sanctions Procedures) where so specified, be sanctioned as follows:

Thi Son Company Limited (“Thi Son”)

***Recommended Sanction: Debarment with Conditional Release
Minimum Period of Ineligibility of One (1) Year***

It is recommended that Thi Son (together with any entity that is an Affiliate directly or indirectly controlled by Thi Son) be declared ineligible (i) to be awarded or otherwise benefit from a Bank-financed contract, financially or in any other manner;¹ (ii) to be a nominated² sub-contractor, consultant, manufacturer or supplier, or service provider of an otherwise eligible firm being awarded a Bank-financed contract; and (iii) to receive the proceeds of any loan made by the Bank or otherwise to participate further in the preparation or implementation of any Bank-Financed Project; provided, however, that after a minimum period of ineligibility of one (1) year, Thi Son may be released from ineligibility only if Thi Son has, in accordance with sub-paragraph 9.3 of Section III.A of the Sanctions Procedures, materially complied with the Bank’s inspection and audit requests as set forth in INT’s [audit letter to Thi Son], as determined by the World Bank Group’s Integrity Compliance Officer.

In determining this recommended sanction, the SDO took into account, among other things, the nature of the obstructive misconduct that occurred. The SDO did not apply any aggravating or mitigating factors.

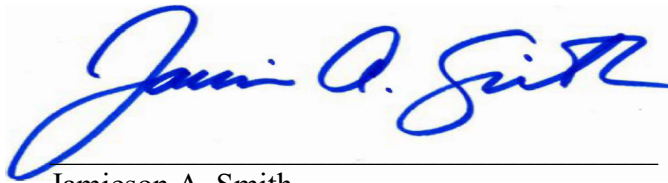
This declaration of ineligibility will extend across the operations of the World Bank Group, including IFC, MIGA, and the guarantee and carbon finance operations of the Bank.³

¹ For the avoidance of doubt, the declaration of ineligibility to be awarded a contract will include, without limitation, (i) applying for pre-qualification, expressing interest in a consultancy, and bidding, either directly or as a nominated sub-contractor, nominated consultant, nominated manufacturer or supplier, or nominated service provider, in respect of such contract, and (ii) entering into an addendum or amendment introducing a material modification to any existing contract.

² A nominated sub-contractor, nominated consultant, nominated manufacturer or supplier, or nominated service provider (different names are used depending on the particular bidding document) is one which has been (i) included by the bidder in its pre-qualification application or bid because it brings specific and critical experience and know-how that allow the bidder to meet the qualification requirements for the particular bid or (ii) appointed by the borrower.

³ Sanctions Procedures, . . . sub-paragraph 9.1(c) of Section III.A. For the avoidance of doubt, the declaration of ineligibility also extends to activities financed through trust funds administered by the Bank to the extent governed by the Bank’s Procurement Regulations (or either of the Regulations’ predecessor documents, the Procurement Guidelines and Consultant Guidelines) or Anti-Corruption Guidelines. *Id.*, sub-paragraph 1.1(c)(i) of Section III.A.

5. The Respondent did not submit an Explanation in accordance with sub-paragraph 4.2(b) of Section III.A of the Sanctions Procedures.
6. Sub-paragraph 4.4 of Section III.A of the Sanctions Procedures provides that if a respondent does not contest the accusation or the sanction recommended by the SDO in a Notice of Sanctions Proceedings by submitting a Response (as defined in the Sanctions Procedures) to the World Bank Group Sanctions Board (the “Sanctions Board”) within ninety (90) days after delivery of such Notice of Sanctions Proceedings, the sanction recommended by the SDO shall enter immediately into force.
7. No Response having been submitted to the Sanctions Board by the Respondent within the specified period, INT’s accusation in the SAE and the sanction recommended by the SDO in the Notice are deemed uncontested for purposes of sub-paragraph 4.4 of Section III.A of the Sanctions Procedures, and the recommended sanction set forth in paragraph 4 above has entered into force as of the date hereof.



Jamieson A. Smith
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Office of Suspension and Debarment (OSD)
The World Bank