



**World Bank Group Integrity Compliance Office:
Promoting Implementation
of Integrity Compliance Programs to
Advance Integrity Principles and Deter Misconduct**

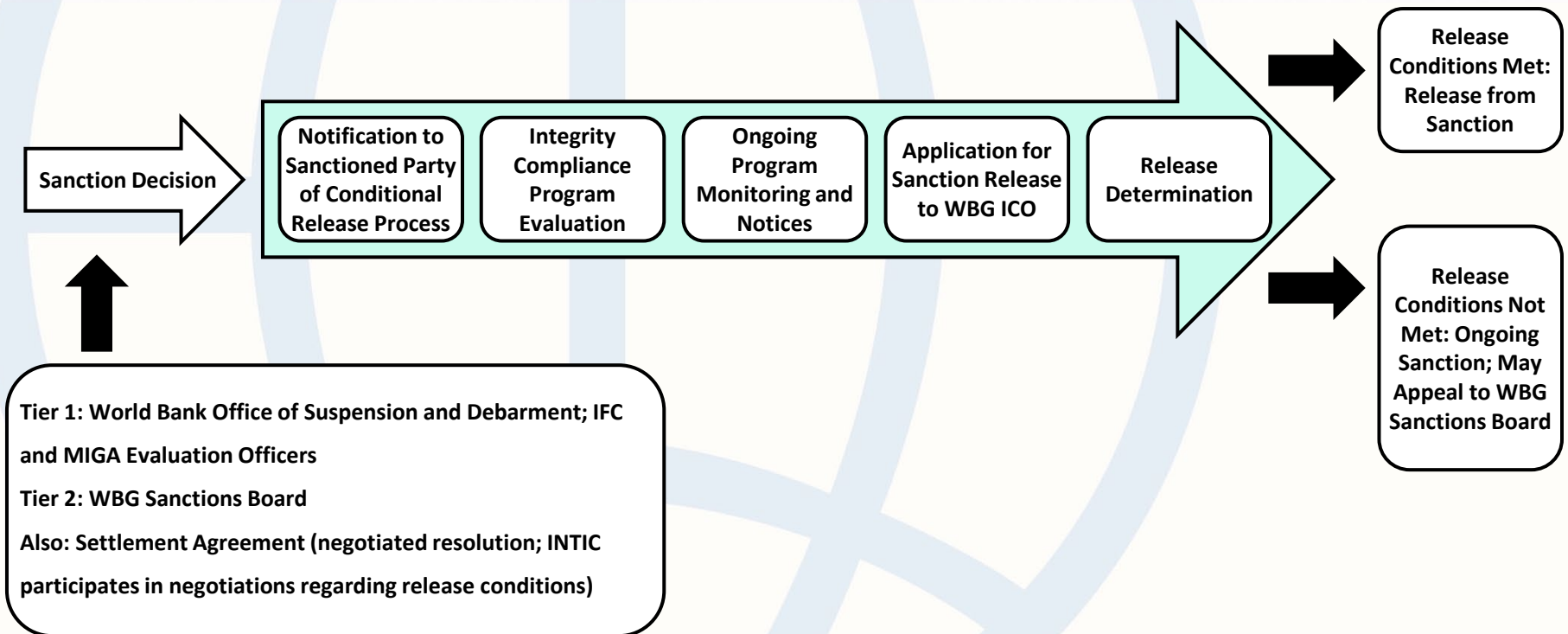
**WBG Integrity Compliance Office
March 2024**



Integrity Compliance as Part of World Bank Group Anti-Corruption Efforts

- Conditional Release as Baseline Sanction to Include Rehabilitative Aspects
- World Bank Group (WBG) Integrity Compliance Guidelines
- Independent Integrity Compliance Office (INTIC) located in Integrity Vice Presidency (INT)
- Integrity Compliance Officer (Head INTIC/ICO) administratively reports directly to INT Vice President
 - ICO functional and administrative reporting lines independent of INT external investigation and litigation units
 - ICO considers case solely on its merits and does not answer to or take instructions from WBG Management, member governments, etc.
 - Separate Code of Conduct for ICO

World Bank Group Conditional Release Process

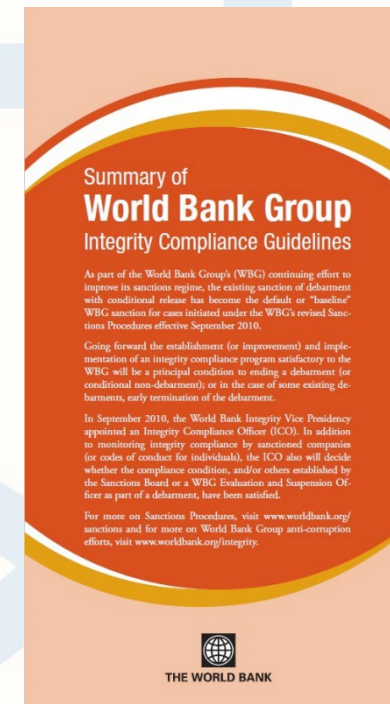


Release Conditions and Integrity Compliance Office Engagements

- Imposition of Integrity Compliance Measures Conditions (e.g., integrity compliance program, bid policies and procedures, training)
- Potential Use of Integrity Compliance Monitors/Experts
- Collaborative Relationships with Sanctioned Entities
- Desk Reviews and Site Visits
- Mentorship
 - Released Entities and Sanctioned Entities
 - Voluntary
 - Benefits for Mentor and Mentee

WBG Integrity Compliance Guidelines

- 1. Prohibition of Misconduct**
- 2. Responsibility** (leadership, individual responsibility, compliance function)
- 3. Program Initiation, Risk Assessment and Reviews**
- 4. Internal Policies** (vetting employees, conflict of interest, gifts, hospitality, entertainment, travel, political contributions, charity, facilitation payments, recordkeeping, and fraudulent, collusive and coercive practices)
- 5. Business Partners** (due diligence, informing partner of integrity program, reciprocal commitment, proper documentation, appropriate remuneration, monitoring/oversight)
- 6. Internal Controls** (financial, contractual obligations, decision-making processes)
- 7. Training & Communication**
- 8. Incentives** (positive, disciplinary measures)
- 9. Reporting** (duty to report, advice, whistle blowing/hotlines, periodic certification)
- 10. Remediate Misconduct** (investigating procedures, respond)
- 11. Collective Action**



MDB General Principles for Business Integrity Programmes

MDB General Principles for Business Integrity Programmes

Preamble

Recognizing that corruption undermines sustainable economic growth, on September 17, 2006, the African Development Bank Group, the Asian Development Bank, the European Bank for Reconstruction and Development, the European Investment Bank Group, the International Monetary Fund, the Inter-American Development Bank Group and the World Bank Group agreed to a harmonized strategy to fight fraud and corruption, the [Uniform Framework for Preventing and Combating Fraud and Corruption](#) (the Framework). The Framework also introduced a set of guidelines and principles to conduct investigations.¹

In furtherance of the Framework, the Multilateral Development Banks (MDBs) have adopted other agreements, principles and guidelines to harmonize features of their sanctions mechanisms and promote consistency. These include:

- **MDB Harmonized Principles on Treatment of Corporate Groups²** – a set of principles setting out common standards to impose sanctions against entities within corporate groups;
- **General Principles and Guidelines for Sanctions³** – a set of principles to ensure consistent treatment of entities and individuals in the determination of sanctions;
- **The Agreement for Mutual Enforcement of Debarment Decisions⁴** (the AMEDD or the Cross Debarment Agreement) of April 9, 2010, which enables participating MDBs to mutually recognize certain sanctions imposed by any of the signatory institutions against entities and individuals found to have engaged in Prohibited or Sanctionable Practices (i.e., fraudulent, corrupt, coercive, and collusive practices as defined therein); and
- **MDB General Principles for Settlements⁵** – a set of principles outlining the features considered by the MDBs for settlements that resolve cases of Prohibited Practices.

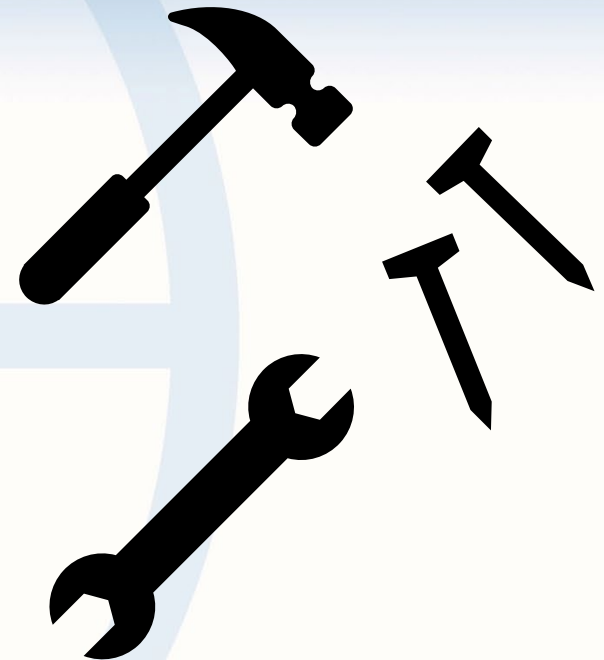
Design and Development of Integrity Compliance Program

- Primary Goals of Integrity Compliance Program
 - Prevent
 - Detect
 - Investigate
 - Remediate
- Ongoing Adaptation and Evolution
 - Tailored to company risk profile and circumstances (e.g., size, type, structure, sector, geography)
 - Maturation of program functions and processes
 - Incorporation of “lessons learned”
 - Adaptation to changed risks, etc.
- Engagement with Corporate Groups
 - Parent company involvement
 - Sanction follows acquisition/merger



Effective Implementation

- Demonstrated Development and Use of Program
 - Compliance staffing—sufficient numbers and requisite expertise
 - Employee and business partner due diligence statistics and records
 - Rejected/terminated employees, business partners, or projects due to identified integrity concerns
 - Expense reporting and recording (e.g., logs, approvals, denials, etc.)
 - Use of advice and reporting channels
 - Investigations and remedial actions taken
 - Internal and external communications
 - Training and certification—types and statistics



Outreach

- Outreach
 - Collective action during and after sanction
 - Initiatives with MDBs, international organizations, member governments, NGOs, etc.
 - *Integrity Compliance Knowledge Sharing Platform* (Funded by Korea-World Bank Partnership Fund):
<https://www.integritycomplianceknowledgehub.org/>
 - *Integrity Compliance Programs for SMEs - Practical Guidance and Resources* (Published with Ministry of Justice, Republic of Korea):
<https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099717003082422668/idu1a80129c3178a91493c1b3521418d07f88f2e>





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