



WORLD BANK GROUP
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Sanctions Board Insights

DECEMBER • 2024

NOTE FROM THE CHAIR & EXECUTIVE SECRETARY



We are delighted to share the highlights of the Sanctions Board and Sanctions Board Secretariat (SBS) activities for the first half of FY25.

The Sanctions Board continued to review contested cases of sanctionable misconduct occurring in World Bank Group (WBG) projects. It also met with counterparts of other Multilateral Development Banks' (MDBs) administrative sanctions regimes to engage in interactive dialogue, discuss harmonized standards and definitions, and share experiences and lessons learned.

With respect to SBS' activities, knowledge sharing and engagement with the global anti-corruption community remain central to its mission. Over the past few months, SBS actively liaised with their peers at MDBs, collaborated with representatives from member countries on integrity matters, and presented to anti-corruption professionals on the global stage. These efforts continue to strengthen partnerships, promote harmonization within the global anti-corruption framework, and support international actions against misconduct at the highest levels.

We invite you to explore these initiatives in this edition of Sanctions Insights. As 2024 ends, we also take this opportunity to extend our warmest wishes for a safe and joyful holiday season and a prosperous new year.

With warm regards,
Maria & Jodi

POLICY AND DECISIONS UPDATES

Update to the Sanctions Framework

In October 2024, the WBG issued new [Sanctioning Guidelines](#) that apply to sanctions cases going forward; this is the first time the document has been revised since 2011. The Guidelines are a key part of the sanctions framework; they describe what factors may affect the choice, severity, and proportionality of any sanction. The new version is based on the preceding version but seeks to better reflect the existing practice of the Sanctions Board and other decision-makers. The Guidelines also emphasize the flexibility accorded to judges in determining the appropriate sanction in individual cases.

Becoming a Better Knowledge Bank

Since 2012, the Sanctions Board has posted its decisions as public documents on the [Sanctions Board website](#), with direct references in the [Bank's sanctions/debarment listing](#). In addition, these decisions are now available via the WBG's public

[Documents & Reports](#) directory, along with other publications of the Sanctions Board (its periodic Law Digest and this Newsletter). To find the decisions and digests, use the Advanced Search option and type "Sanctions Board" in the Author field. To find this and other issues of this newsletter, using the basic search bar is sufficient - simply type "sanctions board insights" and click Enter!

COMMUNICATIONS UPDATES

WBG Sanctions System Annual Report for FY2024



FY24 WBG Sanctions System Annual Report

In October 2024, the WBG issued the [FY24 WBG Sanctions System Annual Report](#) highlighting the recent work and accomplishments of the Integrity Vice Presidency (INT), the Office of Suspension and Debarment (OSD), the Sanctions Board, and the Integrity Compliance Officer (ICO). The report underscored the role of the sanctions system as a pillar of the WBG's anti-corruption efforts. The annual publication also shared many examples of how these core departments work to build knowledge and share lessons learned with other stakeholders in international development.

#AntiCorruptionDay 2024: Committing Ourselves to Good Governance and Accountability



#AntiCorruptionDay 2024

To protect our funds from waste and misuse, the WBG relies on a rigorous Sanctions System, a two-tiered mechanism comprised of the OSD and the Sanctions Board. Together, the system upholds integrity standards for our financing and guarantees. It ensures that our funds reach their intended purposes by holding wrongdoers accountable through sanctions. But how prepared is this system for the challenges of tomorrow? Read [here](#) to find out how the Sanctions System is staying fit for purpose as the WBG sharpens its mission, vision, and strategic direction to meet the pressing demands of today and tomorrow.

Working with Our External Anti-Corruption Partners



Members of INT, OSD, SBS and EACC

Throughout the year, SBS collaborates with national anticorruption agencies to build networks and enhance the review and adjudication of misconduct cases beyond the WBG's own development projects. Two such opportunities occurred during the first half of FY25.

First, on September 19, 2024, SBS partnered with OSD to provide an overview of the WBG's two-tier sanctions process to members of the Fraud and Corruption Unit (FCU) of the Ministry of Foreign Affairs (MFA) of the Netherlands. Discussions focused on the sufficiency of evidence supporting misconduct cases, the range of sanctions, and the guiding principles to determine the appropriate and proportionate sanction to the offence. Second, on December 11, 2024, SBS and OSD provided an overview of the WBG Sanctions System to a high-level delegation from the Kenyan Ethics and Anti-Corruption Commission (EACC). The session was part of a series of knowledge and learning exchanges coordinated by INT. Discussions focused on the role accountability mechanisms play in establishing a culture of integrity and good governance and ensuring public funds are used for their intended purposes. The group also explored together the different types of sanctions used to deter and rehabilitate those who engage in sanctionable misconduct and the significance of upholding an independent and impartial adjudication process to ensure the prompt and fair disposition of contested cases.

International Law Institute Seminar

In September 2024, SBS led a seminar on Suspension and Debarment in Public Procurement. The seminar was attended by a delegation of 13 public officials, development agency staff, and financial sector leaders. These attendees came from Saudi Arabia, Ghana, South Korea, Mongolia, Côte d'Ivoire, and Uganda. The half-day seminar was part of a larger Procurement Integrity and Audit course, hosted by the International Law Institute in Washington, DC. During the seminar, participants learned about the WBG's approach to corruption risks. They also discussed how the Bank reaches final suspension and debarment decisions. The event highlighted the importance the institution places on transparency and due process.



Brazil - StAR Initiative Report: Survey on Direct Recovery of Assets



*Felipe Rocha dos Santos, Senior Counsel, SBS
at the G20 ACWG Meeting*

Under a cross-support arrangement with the [Stolen Asset Recovery \(StAR\) Initiative](#), SBS co-authored a [Report on Direct Recovery of Assets \(DRA\)](#) for the G20 Anti-Corruption Working Group (ACWG). The report was led by StAR and the Brazilian Attorney-General's Office (AGU). Based on a survey of 22 countries, this document analyzed legislative frameworks and practices related to DRA, promoting awareness of remedies outlined in Article 53 of the United Nations Convention against Corruption (UNCAC). The report was presented at the **G20 Anti-Corruption Working Group (ACWG) Meeting** that took place in Natal, Brazil, from October 22–23, 2024. The WBG was represented at the meeting by StAR and SBS.

Africa Year-End Event for the Global ACFE

SBS gave a capacity-building presentation for local and regional anti-fraud specialists in South Africa and Namibia. The training was held as part of the Africa Year-End Event for the global Association of Certified Fraud Examiners (ACFE), hosted by the ACFE's Namibia Chapter. At this event, certified fraud examiners, auditors and other integrity professionals learned about the ways in which development organizations work to prevent, detect, and counteract fraud and corruption. The participants received information about the WBG's Sanctions System, its mechanisms to promote integrity among private sector partners, and the development community's harmonized approaches to anti-corruption.



*Eugenia Pyntikova, Senior Counsel, SBS
at the Africa Year-End Event for the Global ACFE*



Board Members and Secretariats of the various MDBs Appellate Sanctions Bodies

SBS and the Chair of the Sanctions Board participated in the MDB Appellate Sanctions Bodies Conference hosted by the Inter-American Development Bank (IDB) in Washington, DC, on November 25–26, 2024. The invitation-only Conference brought together participants from seven MDBs and the Global Fund. The Conference served as a forum for independent decision-makers within the MDB administrative sanctions systems working at the final tier of review to discuss their experiences, exchange ideas, and identify forward-looking recommendations. Participants engaged in discussions on several topics of common interest relevant to the disposition of cases and the administration of justice, including reflections on due process, the independence and impartiality in the sanctions system's adjudication process, the future development and harmonization of institutional sanctions frameworks, and sanctions subject to conditions designed to aid in the rehabilitation of sanctioned parties.

OUTREACH, KNOWLEDGE & LEARNING

SBS Mission to Africa



*Eugenia Pyntikova, Senior Counsel, SBS with WBG staff
in Johannesburg, South Africa*

SBS held hybrid trainings for WBG staff in South Africa, Mozambique, Madagascar, Lesotho, Angola, Botswana, Comoros, Eswatini, Lesotho, Mauritius, Namibia, Seychelles, South Africa, and Zimbabwe. The trainings focused on the WBG's Sanctions System and the ways in which staff in operations or working on business development are instrumental contributors to the WBG's anti-corruption agenda. Participants learned about risks of fraud and the diverse tools at their disposal to prevent and react to potential misconduct in WBG Projects. SBS is grateful for the partnership of the Bank's Country Office in Johannesburg and IFC's Integrity Counsel in Pretoria, South Africa, in facilitating and supporting these sessions.

SBS Mission to Brazil

On October 24, 2024, SBS delivered an in-person presentation on the WBG's Sanctions System and Sanctions Board at the IFC office in Sao Paulo, with remote participation from staff at the Country Office in Brasilia. This outreach initiative engaged dozens of staff across various units in Brazil, raising awareness of fraud and corruption issues and highlighting the role of the Sanctions System in protecting WBG funds and ensuring accountability in our operations.



*Felipe Rocha dos Santos, Senior Counsel, SBS
at the IFC Office in Sao Paulo, Brazil*

STAFF PROFILES

From Classroom to Global Impact: An Extern's Experience at SBS



Jason Bugg II, 2024-25 Associate, SBS



Jason at the Marine Corps Marathon

This year, the WBG celebrates 10 years of collaboration with Howard University Law School for an exciting hands-on externship program that places top law students in key departments at the Bank. SBS is honored to be a part of this program. For an inside look at how it works, please check out the profile of our current Associate, Jason Bugg II, [here](#).

Thank you for your interest in the work of the Sanctions Board and the Sanctions Board Secretariat. [Learn more](#).

As always, we welcome any questions, reactions, or suggestions for future editions. Please reach out to us via sanctionsboard@worldbank.org.

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