

SANCTIONS SYSTEM DATA COMPANION

FISCAL YEAR 2024

**PURPOSE AND SCOPE OF THE
FY24 SANCTIONS SYSTEM DATA
COMPANION**

This document provides information on all individuals and entities sanctioned by the World Bank Group in Fiscal Year 2024 (FY24). It also presents data on the length of proceedings and diversity of cases considered and closed at the Sanctions Board level. It serves as a companion to the FY24 Sanctions System Annual Report. The tables in this document derive from published Sanctions Board decisions, uncontested determinations in sanctions cases, published terms of settlement, or public debarment listings. In case of any discrepancy, the published information governs.

The FY24 Sanctions System Data Companion was prepared by the World Bank Group Sanctions Board Secretariat and the World Bank Office of Suspension and Debarment.

Further Information

For further information on the World Bank Group’s sanctions system and links to useful documents, please visit:

- www.worldbank.org/integrity
- www.worldbank.org/sanctions
- www.ifc.org/anticorruption
- www.miga.org/integrity

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ACRONYMS AND ABBREVIATIONS

ADB	Asian Development Bank	IDA	International Development Association
AfDB	African Development Bank Group	IDB	Inter-American Development Bank Group
BANK	World Bank (IBRD and IDA)	IFC	International Finance Corporation
BANK GROUP or WBG	World Bank Group (IBRD, IDA, IFC, and MIGA)	INT	Integrity Vice Presidency
EBRD	European Bank for Reconstruction and Development	MDB	Multilateral Development Banks
FY15	Fiscal Year 2015	MIGA	Multilateral Investment Guarantee Agency
FY24	Fiscal Year 2024	OSD	Office of Suspension and Debarment
IBRD	International Bank for Reconstruction and Development	SBS	Sanctions Board Secretariat
		SDO	Chief Suspension and Debarment Officer

DEBARMENTS IMPOSED IN FY24

This table reflects all debarment sanctions imposed during FY24, whether via settlement agreement, an uncontested determination of the SDO, or a final decision of the WBG Sanctions Board. A debarment sanction necessarily includes a period of ineligibility, which can be of fixed length or indefinite and with conditional release, as noted in the table. Each entry identifies the sanctioned entity and/or individual and background information about the case, including type of misconduct and fixed/minimum length of debarment. The sanctions are presented in chronological order.

In **Fixed-Term Debarments**, the exact period of ineligibility is predetermined. **Debarment with Conditional Release** is a more flexible sanction — the “Length of Debarment” below is a minimum period and the entity can only exit debarment if they comply with certain conditions specific to their case. For the three entities sanctioned via **Debarment with Conversion**, the sanction was multi-part: an initial Fixed-Term Debarment for 10 months, followed by Conditional Non-Debarment for an additional 5 months, convertible to Debarment with Conditional Release in case of non-compliance.

Sanctions Pursuant to	Sanctioned Party	Country of Sanctioned Party	Project Country	Grounds for Debarment	Length of Debarment	Type of Debarment
SDO Uncontested Determination	Ms. Gloria Beatriz Giraldo Laverde	Colombia	Colombia	Collusion	2 years, 4 months	Debarment with Conditional Release
Settlement Agreement	Consultores en Ingenieria S.A. de C.V.	Honduras	Honduras	Fraud	1 year, 6 months	Debarment with Conditional Release
SDO Uncontested Determination	M/S Gul Construction Co.	Pakistan	Pakistan	Corruption and Fraud	3 years, 7 months	Debarment with Conditional Release
SDO Uncontested Determination	Mr. Modou Bousso Diop	Senegal	Democratic Republic of the Congo	Corruption	2 years, 6 months	Debarment with Conditional Release
Settlement Agreement	HTC Construction and Advanced Technology Joint Stock Company	Viet Nam	Viet Nam	Fraud and Obstruction	3 years, 5 months	Debarment with Conditional Release
Settlement Agreement	BETS Consulting Services Limited	Bangladesh	Bangladesh	Fraud and Corruption	1 year, 10 months	Debarment with Conditional Release
Settlement Agreement	Multi-Tech Consult (PTY) Ltd.	Botswana	Kenya, Tanzania, and Zambia	Fraud	3 years, 6 months	Debarment with Conditional Release
Settlement Agreement	Mr. Peter Lambileki	Tanzania	Kenya, Tanzania, and Zambia	Fraud	3 years, 6 months	Debarment with Conditional Release
SDO Uncontested Determination	Perfect Dredging Company Pvt. Ltd.	India	Myanmar	Collusion and Fraud	7 years	Debarment with Conditional Release
SDO Uncontested Determination	Mr. Arputharaj Job Robinson Devaraj	India	Myanmar	Collusion and Fraud	7 years	Debarment with Conditional Release
SDO Uncontested Determination	Xianjiang Communications Construction Group Co., Ltd.	China	Ukraine	Fraud	2 years, 4 months	Debarment with Conditional Release
Settlement Agreement	Africa Enablers GmbH	Switzerland	Somalia	Fraud	10 months	Debarment with Conversion
Settlement Agreement	Dr. Philipp Schuller	Germany	Somalia	Fraud	10 months	Debarment with Conversion
Settlement Agreement	Mr. Stephan Willms	Germany	Somalia	Fraud	10 months	Debarment with Conversion
SDO Uncontested Determination	Baraka Qurilish Servis LLC	Uzbekistan	Uzbekistan	Fraud and Obstruction	4 years, 9 months	Debarment with Conditional Release
Sanctions Board Decision	Diyokes Consultants Limited	Nigeria	Nigeria	Fraud	1 year, 6 months	Debarment with Conditional Release
Sanctions Board Decision	Engineer Innocent O. Diyoke	Nigeria	Nigeria	Fraud	1 year, 6 months	Debarment with Conditional Release
SDO Uncontested Determination	Mr. Akuboh Victor Uneojo	Nigeria	Nigeria	Corruption	2 years, 1 month	Debarment with Conditional Release
SDO Uncontested Determination	Cairo Consult	Egypt	Kenya	Fraud	4 years, 6 months	Debarment with Conditional Release
Settlement Agreement	Mr. Malik Nasir Hussain Tanoli	Pakistan	Pakistan	Fraud	3 years, 6 months, 24 days	Debarment with Conditional Release
Settlement Agreement	Solutions for Development Support (Pvt.) Ltd	Pakistan	Pakistan	Fraud	3 years, 6 months, 24 days	Debarment with Conditional Release

DEBARMENTS IMPOSED IN FY24 (CONT.)

SANCTIONS PURSUANT TO	SANCTIONED PARTY	COUNTRY OF SANCTIONED PARTY	PROJECT COUNTRY	GROUNDS FOR DEBARMENT	LENGTH OF DEBARMENT	TYPE OF DEBARMENT
Settlement Agreement	Community Resilience Initiative	Pakistan	Pakistan	Fraud	3 years, 6 months	Debarment with Conditional Release
Settlement Agreement	Taihan Electric Wire Co., Ltd.	Republic of Korea	Mongolia	Collusion, Fraud, and Obstruction	2 years, 6 months	Debarment with Conditional Release
Settlement Agreement	Mr. Bounlert Chanthasounthone	Lao People’s Democratic Republic	Lao People’s Democratic Republic	Fraud	3 years, 7 months	Debarment with Conditional Release
SDO Uncontested Determination	Computech Business Services Limited	Malawi	Malawi	Fraud	3 years	Debarment with Conditional Release
SDO Uncontested Determination	“Timir” LLP	Kazakhstan	Kyrgyz Republic	Fraud	2 years, 8 months	Debarment with Conditional Release
Settlement Agreement	Marseille for Engineering & Trading S.A.L. Offshore (doing business as MUE Group)	Lebanon and Jordan	Iraq	Corruption	2 years, 6 months	Debarment with Conditional Release
SDO Uncontested Determination	“İnteryer İnşaat” Məhdud Məsuliyyətli Cəmiyyəti	Azerbaijan	Uzbekistan	Fraud	2 years, 8 months	Debarment with Conditional Release
Settlement Agreement	Future Netwings Solutions Private Limited	India	India	Collusion	1 year, 3 months	Debarment with Conditional Release
SDO Uncontested Determination	Thanh Cong Construction and Investment JSC	Viet Nam	Viet Nam	Obstruction	1 year, 6 months	Fixed-Term Debarment
SDO Uncontested Determination	Construcciones del Siglo 21	Colombia	Colombia	Fraud and Collusion	3 years, 3 months	Debarment with Conditional Release
SDO Uncontested Determination	Mr. Orlando Fajardo Castillo	Colombia	Colombia	Fraud	2 years, 4 months	Debarment with Conditional Release
Settlement Agreement	Ernst & Young LLP	Kenya	Somalia	Fraud and Corruption	2 years, 6 months	Debarment with Conditional Release
SDO Uncontested Determination	Hoang Nhan Construction and Investement JSC	Viet Nam	Viet Nam	Obstruction	1 year, 6 months	Fixed-Term Debarment
SDO Uncontested Determination	Thang Long Construction Limited	Viet Nam	Viet Nam	Obstruction	1 year, 6 months	Fixed-Term Debarment

NON-DEBARMENT SANCTIONS IMPOSED IN FY24

This table reflects any non-debarment sanctions imposed in FY24. Non-debarment sanctions involve a finding of liability against a firm or individual without impact on their eligibility to bid or work on projects financed by the World Bank Group. The sanction of Conditional Non-Debarment involves a limited period of eligibility during which the respondent must demonstrate to the Bank Group its compliance with specified conditions **in order to avoid** conversion of the sanction to debarment.

SANCTIONED PURSUANT TO	FIRM/INDIVIDUAL NAME	COUNTRY OF RESPONDENT	PROJECT COUNTRY	GROUNDS FOR SANCTION	SANCTION IMPOSED
Sanctions Board Decision	TPF Getinsa Euroestudios, S.L.	Spain	Viet Nam	Corruption and Collusion	Conditional Non-Debarment 3 years, 9 months
Settlement Agreement	Nippon Koei Latin America – Caribbean Co., Ltd.	Japan	Argentina, Ecuador	Fraud	Conditional Non-Debarment 1 year, 5 months, and 9 days

CROSS-DEBARMENTS IMPOSED IN FY24

This table reflects debarments imposed by the World Bank Group in FY24, consistent with the Agreement for Mutual Enforcement of Debarment Decisions (2010), signed by WBG, ADB, AfDB, EBRD, and IDB. The table below provides information for each of those debarments, including the specific type of sanction initiated by the debarring institution as well as the original basis for sanction.

SANCTIONED PARTY	COUNTRY OF SANCTIONED PARTY	GROUND FOR ORIGINAL DEBARMENT	LENGTH OF DEBARMENT	TYPE OF SANCTION	DEBARRING MDB
Jiangxi Mingzheng Transformer Equipment Co., Ltd	China	Fraud	4 years	Fixed-Term Debarment	ADB
Bega Consulting Engineers Plc	Ethiopia	Fraud	1 year, 3 months	Debarment with Conditional Release	AfDB
Mr. Gidey Gebregziabher Gebremariam	Ethiopia	Fraud	1 year, 3 months	Debarment with Conditional Release	AfDB
JOYCOT GENERAL CONTRACTORS LIMITED	Kenya	Fraud	1 year, 3 months	Debarment with Conditional Release	AfDB
KS-Group LLP	Kazakhstan	Fraud	1 year, 6 months	Fixed-Term Debarment	EBRD
“Agidel-As” LLP	Kazakhstan	Fraud	3 years	Fixed-Term Debarment	EBRD
AQUA RIL S.A.C.	Peru	Fraud	2 years, 7 months	Fixed-Term Debarment	IDB
Mr. Pedro Alejandro Egusquiza Melendez	Peru	Fraud	2 years, 7 months	Fixed-Term Debarment	IDB
Mr. Albert Alejandro Ortiz Rincón	Colombia	Fraud	8 years	Fixed-Term Debarment	IDB
Proyectos de Ingeniería y Servicios para el Medio Ambiente S.A.S.	Colombia	Fraud	8 years	Fixed-Term Debarment	IDB
Mr. Farad dos Santos Mercês	Brazil	Fraud and Corruption	6 years	Fixed-Term Debarment	IDB
F.I. Comércio em Geral Eireli	Brazil	Fraud and Corruption	6 years	Fixed-Term Debarment	IDB
Futura Distribuidora e Comércio em Geral Eireli	Brazil	Fraud and Corruption	5 years	Fixed-Term Debarment	IDB
Futura Climatização Distribuidora Comércio e Serviços LTDA.	Brazil	Fraud and Corruption	6 years	Fixed-Term Debarment	IDB
Lícita Distribuidora Comércio e Serviços EIRELI	Brazil	Fraud	6 years	Fixed-Term Debarment	IDB
Mr. Frederico De Oliveira Rosa	Brazil	Fraud	6 years	Fixed-Term Debarment	IDB
JLM Distribuidora Comércio e Serviços EIRELI	Brazil	Fraud and Corruption	6 years	Fixed-Term Debarment	IDB
EGIS EAU S.A.S.	France	Fraud and Corruption	3 years	Debarment with Conditional Release	IDB
EGIS INTERNATIONAL S.A.S	France	Fraud and Corruption	3 years	Debarment with Conditional Release	IDB
EGIS COLOMBIA S.A.S.	Colombia	Fraud and Corruption	3 years	Debarment with Conditional Release	IDB

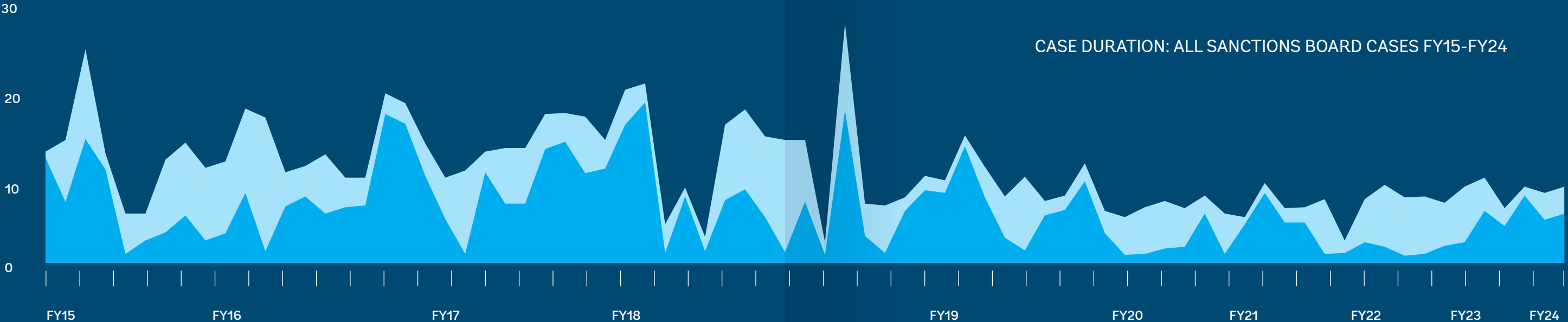
Full text of the Cross Debarment Agreement: [https://www.worldbank.org/content/dam/documents/sanctions/other-documents/osd/AgreementforMutualEnforcementofDebarmentDecisions\(4.9.2010\).pdf](https://www.worldbank.org/content/dam/documents/sanctions/other-documents/osd/AgreementforMutualEnforcementofDebarmentDecisions(4.9.2010).pdf)

SANCTIONS BOARD CASES: LENGTH OF PROCEEDINGS (FY15-FY24)

These charts provide information on the length of sanctions proceedings that reached the Sanctions Board, focusing on data between FY15 and FY24. Sanctions proceedings typically begin when a Notice is issued to a respondent and close when terminated via an uncontested determination of the SDO or a final decision of the Sanctions Board. The case timelines below include some key distinctions between case stages (before and after close of record) and case types (with or without a Sanctions Board hearing).

4.5 MONTHS
AVERAGE TIME FROM CLOSE
OF RECORD TO ISSUANCE OF
DECISION

Months



- Months between Appeal and Close of Record
- Months between Close of Record and Issuance of Decision

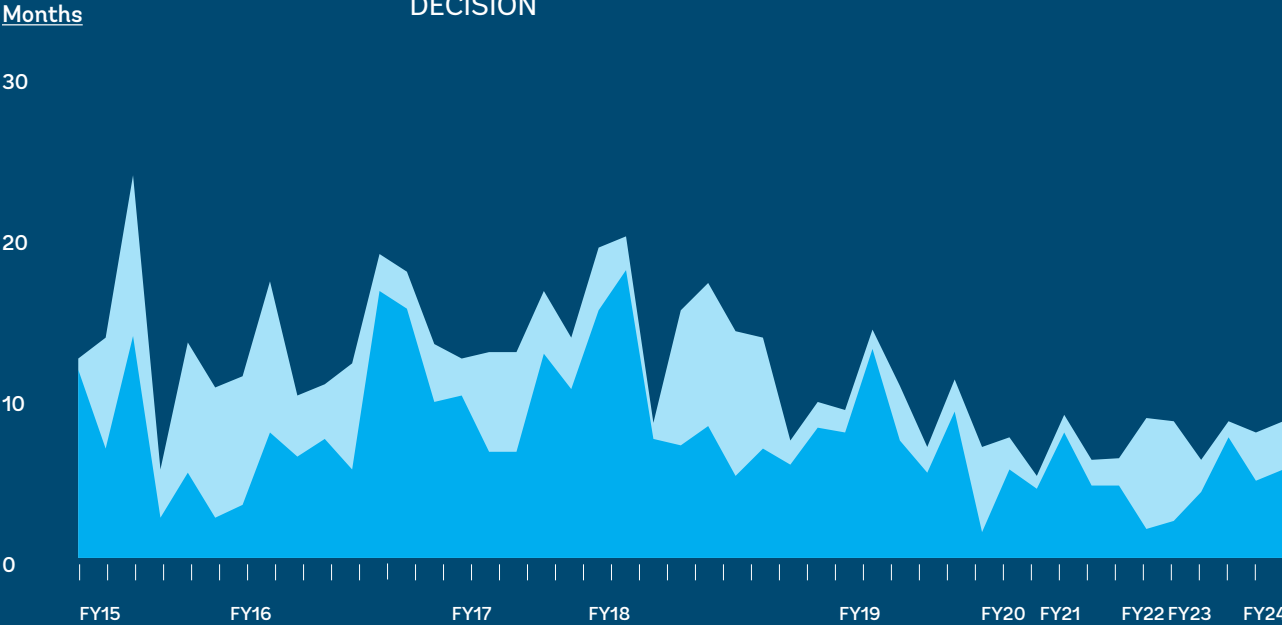
5.9 MONTHS
AVERAGE TIME FROM APPEAL
TO CLOSE OF RECORD

SANCTIONS BOARD CASES WITH HEARINGS (FY15-FY24)

Once a case is appealed to the Sanctions Board, either party may request a hearing, or the Sanctions Board Chair may call one at their discretion. The hearing forms part of the case record.

4.1 MONTHS

AVERAGE TIME FROM CLOSE OF RECORD TO ISSUANCE OF DECISION



- Months between Appeal and Close of Record
- Months between Close of Record and Issuance of Decision

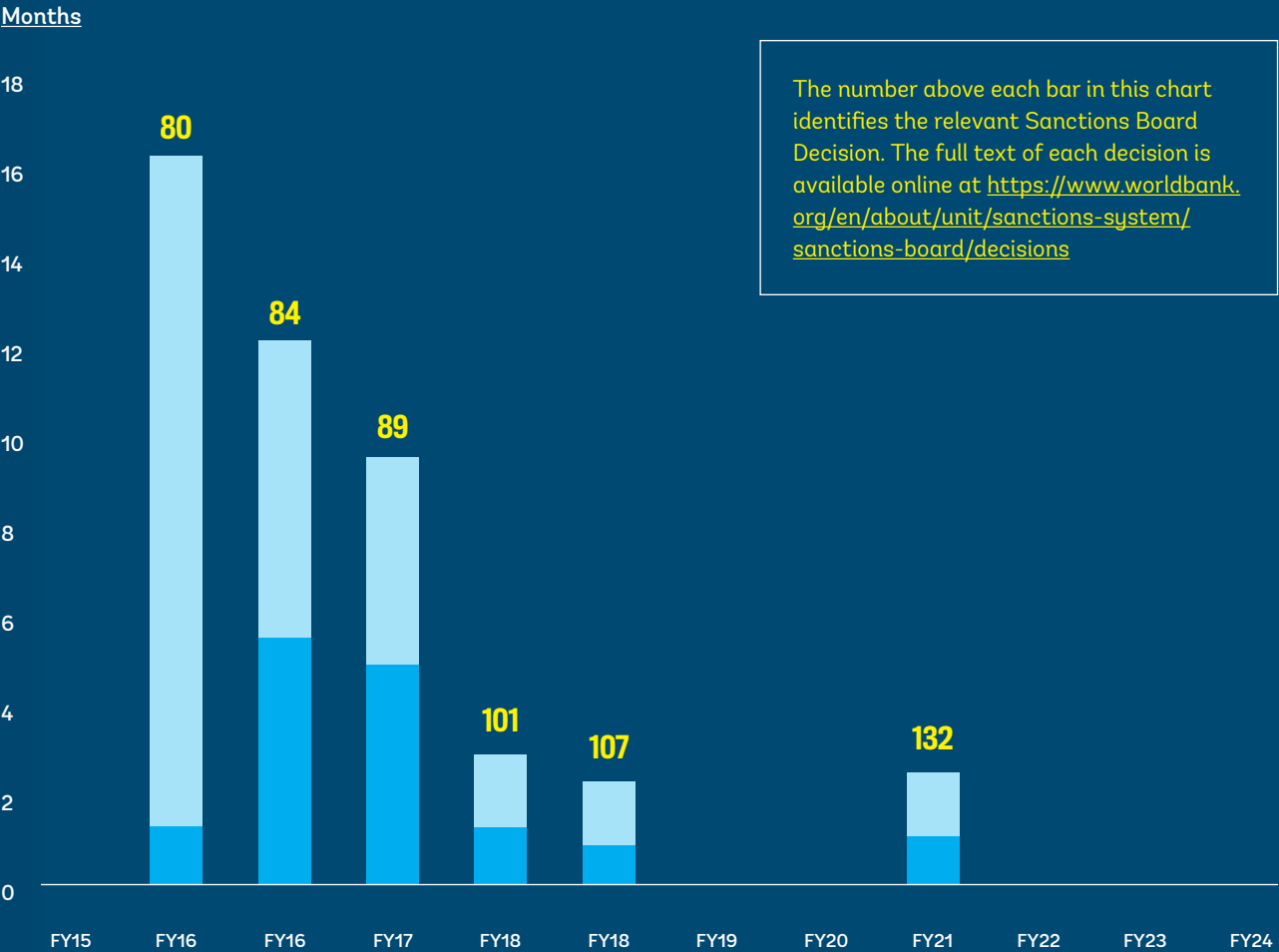
7.6 MONTHS

AVERAGE TIME FROM APPEAL TO CLOSE OF RECORD

BEYOND REGULAR APPEALS (FY15-FY24)

In addition to cases contested from the first tier of review, the Sanctions Board may consider several other types of cases, including requests for reconsideration of its own decisions and contested determinations by other decision makers. This chart provides the timelines for such cases over the past decade. Please refer to individual decisions, as noted, for more information.

SB CASES OUTSIDE REGULAR APPEALS: Requests for Reconsideration and Contested Successorship

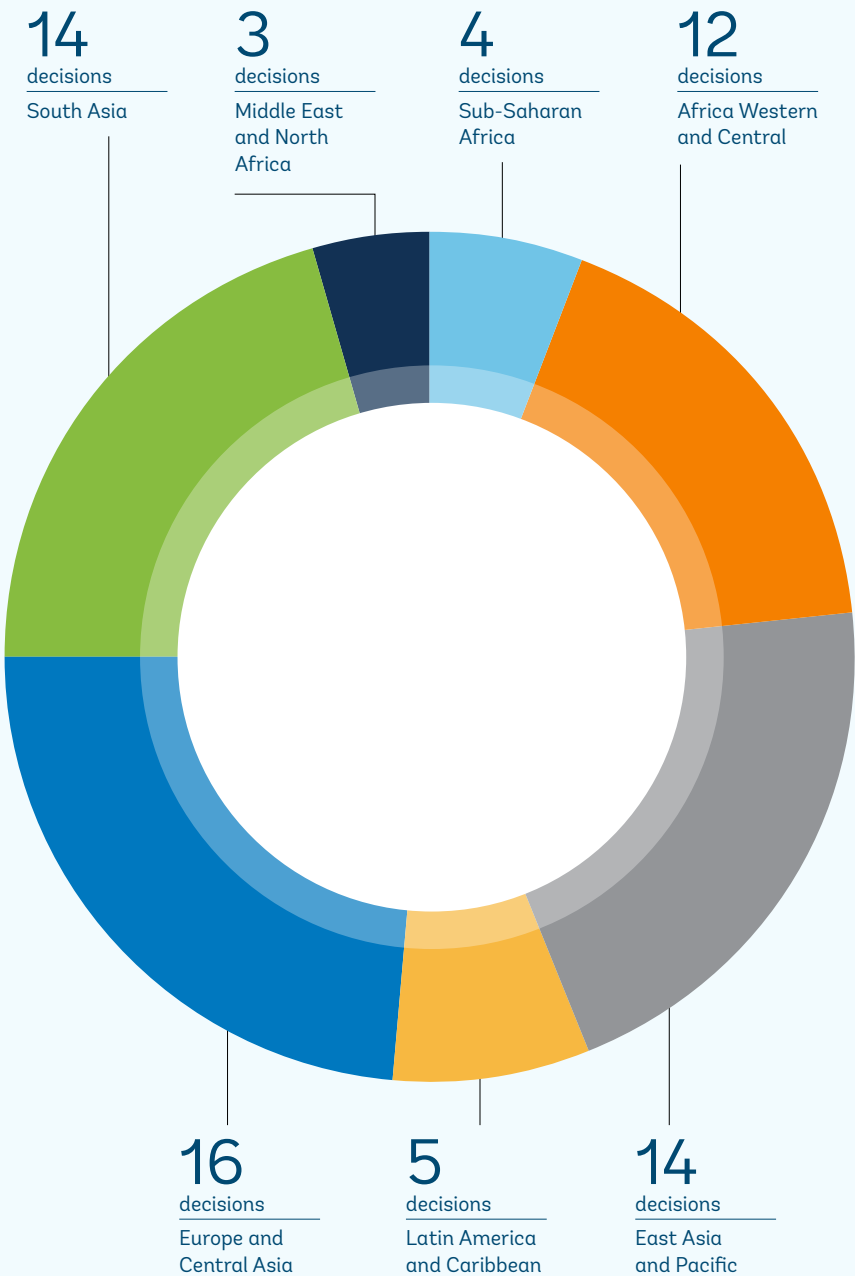


The number above each bar in this chart identifies the relevant Sanctions Board Decision. The full text of each decision is available online at <https://www.worldbank.org/en/about/unit/sanctions-system/sanctions-board/decisions>

- Months between Appeal and Close of Record
- Months between Close of Record and Issuance of Decision

SANCTIONS BOARD CASES: REGIONS OF AFFECTED PROJECTS (FY15-FY24)

These charts show the diversity of cases considered by the Sanctions Board and the number of decisions associated with each sector or region.



SANCTIONS BOARD CASES: INDUSTRY SECTORS OF AFFECTED PROJECTS (FY15-FY24)

Some Sanctions Board decisions involve multiple regions or multiple industry sectors.





Corruption is corrosive to development. The World Bank is committed to ensuring that its resources are used transparently, accountably, and only for their intended purposes.

If companies or individuals engage in corruption involving World Bank funds, the offices of the World Bank's sanctions system—the Integrity Vice Presidency, the Office of Suspension and Debarment, and the Sanctions Board—help ensure that they are held to account.

Scan the QR code above to learn more about how the World Bank's sanctions system works and how these offices help fight corruption in development.

All Sanctions Board decisions referenced in this Data Companion are public and available online at <https://www.worldbank.org/en/about/unit/sanctions-system/sanctions-board/decisions>

