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World Bank Group Integrity Compliance Office: Promoting Business Integrity Through Knowledge Sharing

WBG Integrity Compliance Office
October 9, 2025

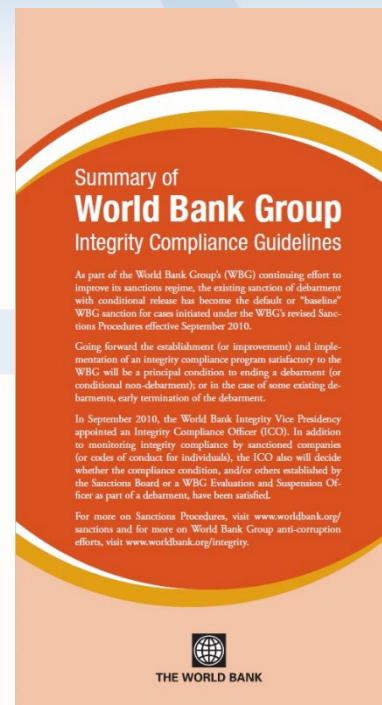


Integrity Compliance as Part of World Bank Group Anti-Corruption Efforts

- World Bank Group (WBG) Anticorruption Guidelines
 - Specify integrity-related expectations for participants in WBG-financed projects
 - Sanctionable practices: fraud, corruption, collusion, coercion, obstruction
 - Set out WBG inspection, audit, and sanction rights
- World Bank Procurement Regulations for Investment Project Financing Borrowers
 - Integrity is a core procurement principle
 - Require application of, and compliance with, World Bank Anti-Corruption Guidelines
 - Refer to World Bank inspection, audit, and sanction rights
 - Standard bidding documents with integrity-related provisions
- WBG Sanctions Framework with Conditional Release as Baseline Sanction
 - To include rehabilitative aspects for release from WBG sanction
 - Imposition of integrity compliance measures conditions for release (e.g., integrity compliance program, code of conduct, bid policies and procedures, financial controls, training)
 - Independent Integrity Compliance Office located in WBG Integrity Vice Presidency
 - WBG Integrity Compliance Guidelines
 - Multilateral Development Bank (MDB) General Principles for Business Integrity Programmes

WBG Integrity Compliance Guidelines

1. **Prohibition of Misconduct**
2. **Responsibility** (leadership, individual responsibility, compliance function)
3. **Initiation, Risk Assessment, Reviews**
4. **Internal Policies** (due diligence, conflict of interest, gifts and hospitality, travel, charitable/political contributions, facilitation payments, recordkeeping, prohibited practices)
5. **Business Partners** (due diligence, informing partner, reciprocal commitment, documentation, remuneration, payment, monitoring)
6. **Internal Controls** (financial controls, contractual obligations, decision-making processes)
7. **Training and Communication**
8. **Incentives** (positive, disciplinary)
9. **Reporting** (duty to report, advice channels, whistleblowing hotlines, periodic certification)
10. **Remediate Misconduct** (investigation protocol, response measures)
11. **Collective Action**



(<https://thedocs.worldbank.org/en/doc/06476894a15cd4d6115605e0a8903f4c-0090012011/original/Summary-of-WBG-Integrity-Compliance-Guidelines.pdf>)

MDB General Principles for Business Integrity Programmes

- Non-exhaustive, non-binding guidance relating to business integrity programs in context of multilateral development bank (MDB)-financed projects; can be used as guidance in contexts beyond such projects
- Provide harmonized approach participating MDBs may incorporate when imposing sanctions under respective sanctions systems
- Encourage companies to develop, and implement effectively, business integrity programs as standard business practice
- Intended to be adaptable to entities of all types and sizes, operating in various environments

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 \(the Framework\)](#).¹ 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 Groups**² – a set of principles setting out common standards to impose sanctions against entities within corporate groups;
- **General Principles and Guidelines for Sanctions**³ – a set of principles to ensure consistent treatment of entities and individuals in the determination of sanctions;
- **The Agreement for Mutual Enforcement of Debarment Decisions**⁴ (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 Settlements**⁵ – a set of principles outlining the features considered by the MDBs for settlements that resolve cases of Prohibited Practices.

(<https://thedocs.worldbank.org/en/doc/528f96bfd7a3991fba23747e20ed6dc0-0530012023/original/MDB-General-Principles-for-Business-Integrity-Programmes.pdf>)

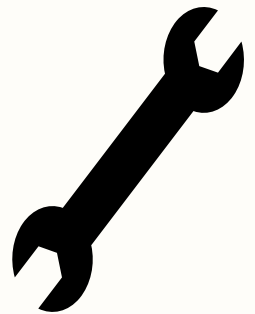
Integrity Compliance Program Design and Development

- Primary Goals of Integrity Compliance Program
 - Prevent
 - Detect
 - Investigate
 - Remediate
- Program Development
 - Based on comprehensive risk assessment of entity's operations
 - Tailored to company risk profile and circumstances (e.g., size, type, structure, sector, geography, culture)
 - Sets out entity's values, policies, and procedures to prevent, detect, investigate, and remediate prohibited practices in entity's operations
 - Addresses and includes provisions intended to minimize occurrence of identified risks and structured to accommodate changing circumstances and evolve over time
 - Must be capable of implementation



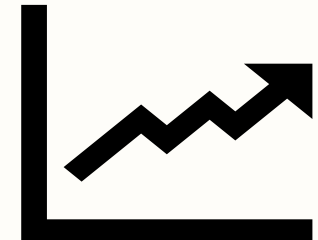
Effective ICP Program Implementation

- Compliance function (e.g., structure, independence, resources, requisite expertise, reporting)
- 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; patterns identified
- Issues detected
- Investigations and remedial actions taken
- Internal and external communications
- Training and certification—types and statistics
- Employee surveys, including changes over time
- Incorporation of lessons learned
- Program adjustment



Integrity Compliance Program Evolution

- Ongoing risk assessment
 - Adjustment based on incidents and lessons learned
 - Adaptation to changed risks (e.g., entry into new markets)
 - Reflection of changed legal environment
- Regular reviews
 - Consideration of impact on business operations
 - Identification of trends
 - Ongoing incorporation of “lessons learned”
 - Spot audits
- Communication and training on issues identified
- Maturation of program functions and processes
 - Resources: funding and personnel
 - Automation of processes
- Benchmarking



World Bank Group Integrity Compliance Office

Outreach Activities

- Awareness raising efforts
- Collective action during and after release from WBG sanction (e.g., mentorship program, workshops)
- Initiatives with MDBs, international organizations, government partners, NGOs, CSOs, business associations, academia, 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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