

Annual Report 2005

OFFICE OF INSTITUTIONAL INTEGRITY



Inter-American Development Bank



Inter-American Investment Corporation

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For **more information** or to **report or discuss a matter of concern**, please contact the Office of Institutional Integrity through any of the following means. Strict confidentiality is always maintained.

- International toll-free hotline: (877) 223-4551 (see page 32 for details)
- Secure and confidential e-mail: allegations@idbfc.org
- Secure and confidential fax: (202) 312-4029
- Web-based form that permits anonymous reporting: www.idbfc.org
- Postal address: Office of Institutional Integrity
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Washington, DC 20577 USA

Letter from the President

Development for all of us at the Inter-American Development Bank group is about more than numbers. It is building roads that will last, hospitals that will help to cure and schools that will serve to educate. It means helping countries create institutions to promote good governance and the rule of law, and helping the private sector integrate effectively in the development process. It is about building societies that are inclusive, democratic and transparent.

Corruption undermines these efforts and ultimately damages our core mission. It is a multifaceted problem that can hurt the organization, its projects and its borrowers. In short, our development objectives cannot fully succeed without integrity.

The Bank group has adopted a comprehensive strategy to attack the issue on several fronts, based on the principle of zero-tolerance for corruption. We owe it to all our member countries to lead by example.

The operational areas of the Bank group along with our borrowers invest considerable efforts in developing public sector institutions that are able to prevent and detect corruption. Our projects emphasize governance, promote accountability and support public sector reform that will enhance the rule of law.

We are increasing our presence as an international player in promoting anticorruption activities. In 2005, major steps were taken to create a harmonized approach to combat fraud and corruption within the multilateral development banks and the community of international organizations. The Bank group is a leader in this process and will maintain its commitment to achieve a consistent and coherent approach in fighting corruption and promoting transparency.

The Bank group's Office of Institutional Integrity (OII) plays a leading role in all of these initiatives. Although OII is barely two years old, it has already made major strides in grappling with the issues of integrity, corruption, and fraud in the projects the group finances throughout Latin America and the Caribbean, as well as within the institution.



Luis Alberto Moreno

As the numbers in this annual report show, OII received more allegations and consultations in 2005 than in the previous year. Clearly there is growing recognition of the role of the office. I am also encouraged that more staff are consulting with OII and beginning to use it as a resource to help prevent fraud and corruption before they occur.

OII statistics reveal an increased number of cases completed, including more sanctions of firms and individuals found to have violated our policies on fraud and corruption. As sanctions continue to be enforced, the message is clear that the Bank group is resolute in upholding its fraud and corruption regulations.

The Office of Institutional Integrity has also significantly expanded its outreach capacity, increasing efforts to educate our staff – as well as employees at executing agencies, and firms and consultants who do business with the Bank group – on its anticorruption initiatives.

As we look to the future, we must continue to lead in supporting the efforts of our borrowing countries to promote the rule of law and combat corruption. The work of the Office of Institutional Integrity is critical in helping to ensure that the Bank group's activities are conducted in accordance with the highest standards of integrity. For each of us at the Inter-American Development Bank group, integrity and development are inseparable.



Luis Alberto Moreno
President
Inter-American Development Bank

Introduction

The world has acknowledged that corruption, if condoned, will corrode trust and undermine the credibility of public institutions, distort economic incentives, and adversely affect development. In response, the international financial community – and the community of multilateral development banks in particular – has substantially expanded efforts to enhance integrity and combat corruption throughout all activities. Similarly, anticorruption measures are being implemented within countries, in government initiatives, and by the private sector.

The Inter-American Development Bank group (the Inter-American Development Bank, the Inter-American Investment Corporation, and the Multilateral Investment Fund) was among the first international financial institutions to recognize the importance of tackling fraud and corruption across all its operations. The Bank's desire for a comprehensive approach to ensuring integrity in all activities it finances, as well as supporting efforts by member countries, resulted in the Board of Executive Directors adopting the document *Strengthening a Systemic Framework Against Corruption for the Inter-American Development Bank* in 2001. The document provides a mandate for the Bank's integrity agenda in three closely related areas in order to:

- Ensure that Bank staff act in accordance with the highest levels of integrity and that internal policy and procedures support this goal.
- Support programs that will help borrowing countries strengthen good governance, enforce the rule of law, and combat corruption.
- Ensure that activities financed by the Bank are free of fraud and corruption and executed in a proper control environment.

Since adoption of the document, substantial progress has been made in each of these three areas. The Bank has taken significant steps toward ensuring that its staff adheres to the highest ethical standards by working to update the Code of Ethics and establishing senior management committees to implement integrity regulations.

This report is organized in six sections:

- The **first section** presents a summary of the evolution and mandate of OII, as well as its structure and budget.
- **Section II** contains an overview of OII's investigative processes.
- **Section III** summarizes the office's statistical information: How many allegations were received? How do the numbers compare to last year? How many allegations were substantiated?
- **Section IV** looks at various case studies that offer specific lessons learned.
- **Section V** outlines the growing number of preventive initiatives and outreach activities in which OII is involved.
- **Section VI** looks ahead to OII's goals for 2006.

The Bank continues to assist borrowers as part of its strategy to support modernization of the state activities at national and local levels. This strategy includes helping institutions responsible for promoting transparency, accountability, and the fight against corruption.

Finally, the Bank has also demonstrated its commitment to join with the international financial community in taking every possible action to keep all Bank operations free from fraud and corruption. In order to ensure that their funds are used for the purposes intended, these organizations must have as part of their corporate governance structure the capacity to act independently in detecting, investigating, sanctioning and preventing fraud, corruption and misconduct in the activities they finance. For this critical reason, all the major multilateral development banks have created specialized units to act as a focal point in these efforts.

For the Bank group, a key component of this strategy was the creation in 2004 of the **Office of Institutional Integrity (OII)**, an independent unit that reports directly to the President.

OII is required by its mandate to provide ongoing reports of its activities and significant findings to both the senior management of the Bank and the Audit Committee of its Board of Executive Directors. The office must also provide an annual public reporting of its activities, as contained in this report.

In 2005, OII received an increasing number of inquiries over previous years and completed a substantially larger number of cases, several of which have led to the imposition of sanctions. Additional key initiatives include the expansion of preventive activities and strengthening ties to other multilateral organizations. The office complemented its investigative responsibilities with prevention and outreach activities. In short, OII has become a valuable instrument of prevention via deterrence, training, and consultation, among other means.

The results of OII's efforts and the growing trust within the Bank for the office's work, as summarized in this report, demonstrate the Bank's commitment to integrity, implementation of an effective anticorruption program, and leadership within the broader multilateral development bank community on this fundamental subject. This report provides the Bank and the public with an overview of OII's activities and findings during 2005.

Evolution and Mandate



In March 2001, the Inter-American Development Bank created the **Oversight Committee on Fraud and Corruption** (OCFC), a senior management committee including the Vice President for Administration and Finance, the General Counsel, the Auditor General and chaired by the Executive Vice President. The OCFC provides critical monitoring and review in order to prevent, detect, and address fraud and corruption. In this role, the committee oversees investigations of alleged fraud and corruption and implements results from these investigations. The OCFC also recommends cases to the President to be forwarded to national authorities.

Initially, receipt of allegations was handled by the Secretariat to the OCFC, and the Auditor General was tasked with conducting investigations. As the work of the OCFC became more widely known, the number of allegations began to rise. The need for an independent office to conduct investigations became apparent. Consequently, the **Office of Institutional Integrity** was created within the President's office to serve as a focal point for matters related to fraud, corruption and misconduct in Bank-financed operations. OII began its operations in early 2004, assuming responsibility for conducting all investigations and for the work previously done by the Secretariat to the OCFC.

Throughout 2005, OII continued to recruit personnel, adding three professionals. During this period, the position of principal investigator became vacant, but a candidate has been selected and the position will be filled in early 2006. By the end of 2005, OII's permanent staff included six professionals, one administrative assistant and one office assistant.

During 2005, OII also implemented training activities for its staff to ensure they have the necessary knowledge of Bank operations to conduct their work. These activities included training by senior managers on the project cycle, training by the Legal Department on the legal framework of the Bank and attendance at the Bank's training seminar "New Procurement Policies for Goods, Works, and Consulting Services."

Jurisdiction of the Office of Institutional Integrity

The Office of Institutional Integrity is responsible for detecting, investigating and ultimately preventing violations of Bank policies prohibiting fraud, corruption or misconduct with respect to staff members or third parties, in connection with Bank-financed activities. Definitions of fraud and corruption are contained in the Bank's procurement policies (to see these policies go to: www.iadb.org/integrity/AR_links.cfm). Misconduct is considered to be any violation of the Code of Ethics or Staff Rule 323, "Respect in the Workplace."

Mandate of the Office of Institutional Integrity

OII's mandate, finalized in July 2005, gives OII responsibility to:

- Investigate allegations of fraud, corruption and certain alleged violations of the Code of Ethics and related regulations and staff rules.
- Report on investigative findings and lessons learned and provide advice and recommendations arising from those findings to the President, senior management, and appropriate Bank committees.
- Support the development and implementation of outreach and training activities to Bank staff and other relevant parties in order to disseminate lessons learned from investigative results and promote awareness of mechanisms, practices, regulations and policies that promote integrity and prevent fraud and corruption.
- Support the improvement of mechanisms, practices, regulations, and policies that promote an ethical working environment and enhance the integrity of the Bank's operations.
- Coordinate with the Office of Evaluation and Oversight, the Office of the Auditor General and other Bank offices responsible for risk management and internal control functions.
- Serve as the Secretariat for the Oversight Committee on Fraud and Corruption.
- Support the Bank's programmatic and lending activities that include anticorruption and integrity components.
- Coordinate with other international financial institutions and international organizations to share experiences and practices to prevent corruption, and develop integrity programs and strategies.
- Report on significant findings with regard to matters of fraud and corruption to the Audit Committee of the Board of Executive Directors and, as appropriate, to the Board at large and the Bank's external auditors.

OII's **budget** for 2004, its first fiscal year, was \$1.1 million. In 2005, the budget approved was \$1.5 million. For 2006, the budget approved by the Board of Executive Directors is \$1.9 million. The increase will primarily cover salaries of new staff added in 2005 and 2006.

Investigative Processes



All allegations received by OII are reviewed individually and initially reported to the OCFC. Specific details of the allegations and the identity of complainants are kept confidential.

Upon receiving an allegation, OII makes an initial determination whether the information available may concern an issue of fraud or corruption or whether it could be considered a case of misconduct. Issues of fraud or corruption are generally considered as **external** cases. Issues of misconduct are cases of alleged violations by staff of either the Code of Ethics or Staff Rule 323 and are treated as **internal** cases. Allegations of fraud or corruption against Bank staff are considered to be internal as well.

INTERNAL ALLEGATIONS PROCESS

If an internal allegation states facts that might – if proven to be true – constitute a violation of either the Bank's Code of Ethics or of Staff Rule 323, OII refers the allegations to the Chairman of the Ethics Committee or the Chairman of the Conduct Review Committee, as appropriate. Allegations of fraud or corruption by Bank staff, however, always remain within the OCFC's jurisdiction and are subject to investigation by OII. OII will only undertake an investigation of an internal allegation if requested to do so by either committee. Any investigation involving a Bank staff member is made according to the Rules for Bank Administrative Investigations. The results of an investigation into an internal allegation are reported to the committee that requested the investigation.

Internal allegations received by OII that do not state claims under either the Ethics Code or Staff Rule 323 are reviewed to determine if they should nonetheless be referred to the Human Resources Department or the appropriate senior manager. For example, some allegations, while not rising to the level of misconduct, may identify possible issues of irregularities in management or supervision, or violations of other Bank regulations.

Confidentiality

The Inter-American Development Bank's rules regarding confidentiality include:

- The Bank fully protects the confidentiality of complainants.
- All staff involved in an investigative process are obligated to preserve and protect the confidentiality of the investigative information, the subject, the witnesses, and all other parties concerned.
- Any staff member who compromises the confidentiality of a complainant is subject to disciplinary action.
- The Bank accepts anonymous allegations.

EXTERNAL ALLEGATIONS PROCESS

While OII retains the independent authority to determine whether an allegation of fraud or corruption warrants an investigation, the OCFC is advised of all allegations received as well as decisions to investigate. Moreover, the OCFC must approve any decision not to investigate or to close an investigation. In a **preliminary review**, OII analyzes each allegation that raises any concern of possible fraud or corruption. This initial analysis aims at gathering sufficient information to determine whether a full investigation is necessary and appropriate.

The preliminary review is set up to answer **three threshold questions**:

- Does the allegation concern any **Bank group-financed activity**?
- If the allegation is determined to be true, does it constitute a **violation** of the **Bank group’s prohibition against fraudulent or corrupt practices**?
- Does the allegation provide **sufficient credible information** to warrant an investigation by OII?

At this preliminary stage, only in those cases in which the answer is “Yes” to all three questions does OII undertake an investigation. In all other cases, the office submits a recommendation to the OCFC that the case be closed.

Allegations closed at the preliminary stage may nonetheless raise issues that are governed by other Bank policies and regulations. For example, allegations may contain claims of procurement policy violations, contract disputes, or a matter more appropriately addressed by those responsible for project supervision. In such cases, OII recommends that the matter be referred to the appropriate department or manager.

Full investigations into allegations of violations of the Bank’s anticorruption regulations generally involve contacting the staff responsible for supervising the project or activity at issue, including relevant Country Office staff. Upon completion of an investigation, OII submits a **report** of its investigative **findings** and **recommendations** to the OCFC.

Cases are classified as **substantiated** when the evidence has been found to be sufficient to conclude that a fraudulent or corrupt practice, as defined by the Bank, has occurred. **Unsubstantiated** cases are those in which the evidence is insufficient either to confirm or deny the allegations of fraud or corruption. Cases are classified as **unfounded** when the allegations are determined to be untrue.

Once the investigative process is completed, if OII concludes that the evidence is sufficient to support a finding that an act of fraud or corruption has occurred, it may recommend to the OCFC that a **sanction** be imposed, or other action be taken. Sanctions imposed by the Bank are administrative in nature and can include either the imposition of a period of ineligibility from participating in Bank-financed activities or issuance of a letter of reprimand.

Prior to imposition of any sanction, the subject of the investigation is sent a **notice of charges** informing the person or firm that a sanction may be imposed. The notice provides a description of the evidence gathered, and invites the party to respond by submitting any relevant information to the OCFC within a designated time period. The OCFC does not make a final decision on whether to impose a sanction until it has fully considered any information submitted by the party in response to the notice of charges.

When investigations into allegations against firms, private entities or individuals lead to a conclusion that the laws of a country have possibly been violated, OII may advise the OCFC to recommend that the President approve a **referral** of the findings to **national authorities**. Investigations can also result in findings that staff of executing agencies may have violated the Bank's anticorruption regulations. Although the sanctions process applies only to firms, private entities or individuals, the OCFC can also make referrals in such cases. Referrals are generally transmitted through the Executive Director to the Governor of the Bank for the country at issue.

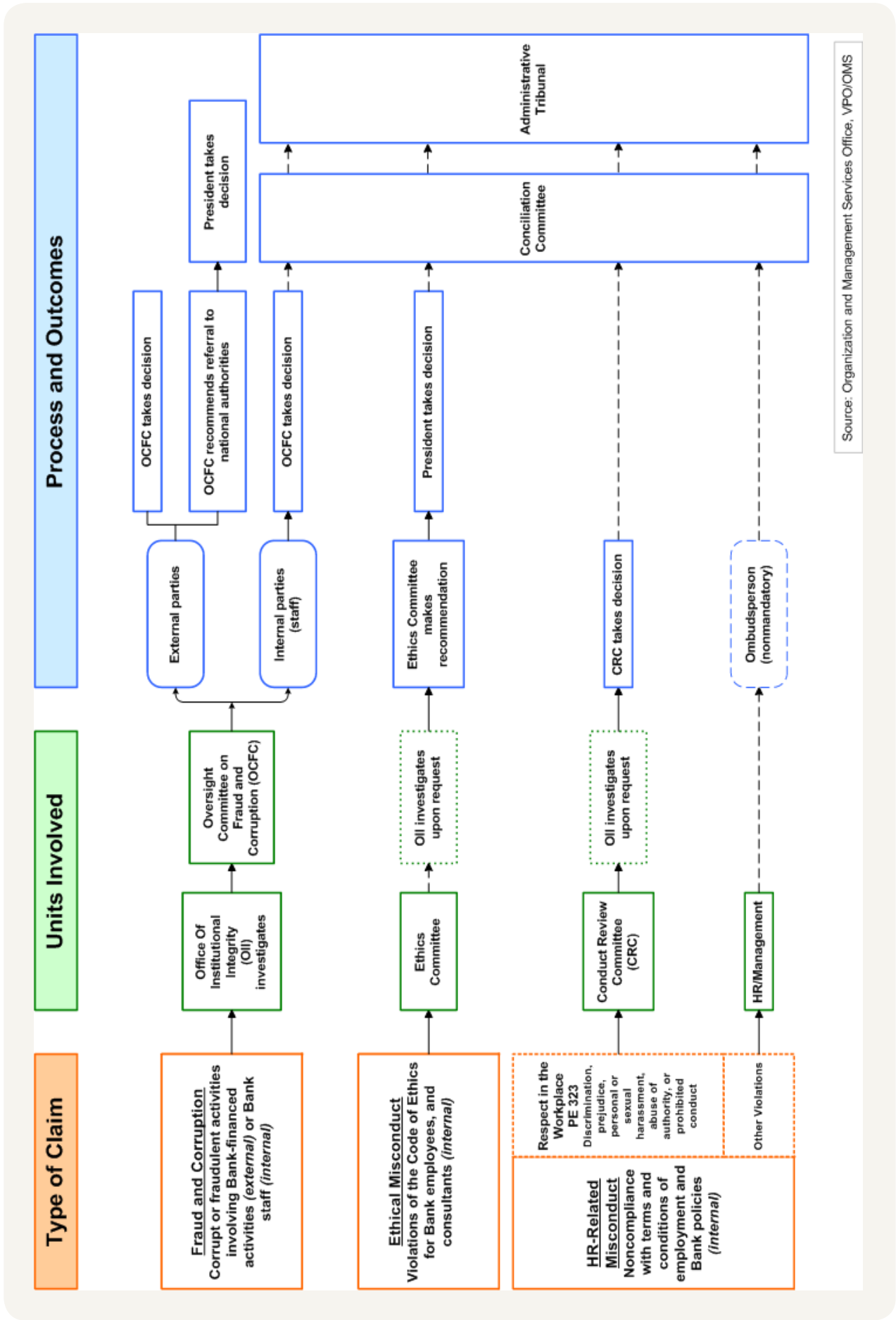
OII continues to seek to improve its investigative processes. It is anticipated that these processes will be further refined in 2006 through consultations with the Board of Executive Directors and senior management. The Board of Executive Directors will also consider updating the sanctions process.

Regulations and Sanctions

The key elements of the Bank's anticorruption regulations and sanctions process are contained in the standard loan documents and the *Policies for the Procurement of Works and Goods* and *Policies for the Selection and Contracting of Consultants*.

Go to: www.iadb.org/integrity/AR_links.cfm to see these policies.

Mechanisms for Investigations and Resolutions of Claims at the Inter-American Development Bank



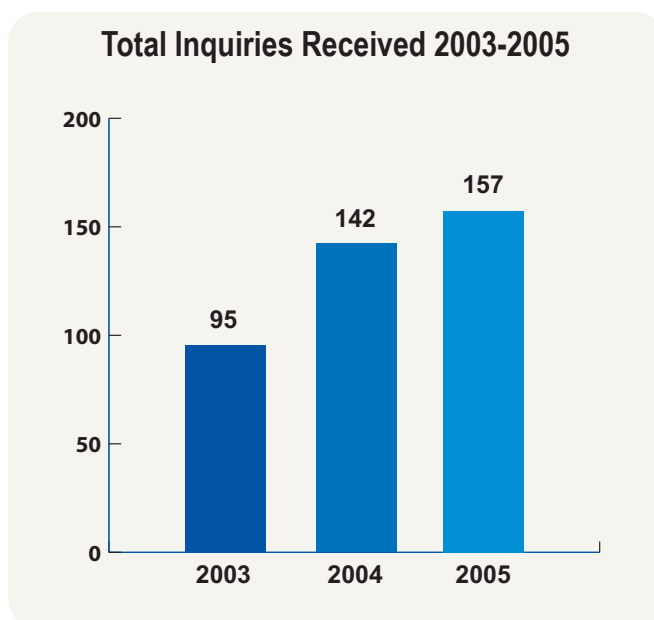
Source: Organization and Management Services Office, VPO/OMS

Statistics



The total numbers of inquiries received by the Office of Institutional Integrity has steadily increased over the past two years (see the figure below). This trend is not believed to be a sign of an increase in the amount of fraud or corruption in Bank-financed activities, but rather an indication of the quality of the mechanisms that the Bank has put into place – as well as growing public trust in those mechanisms.

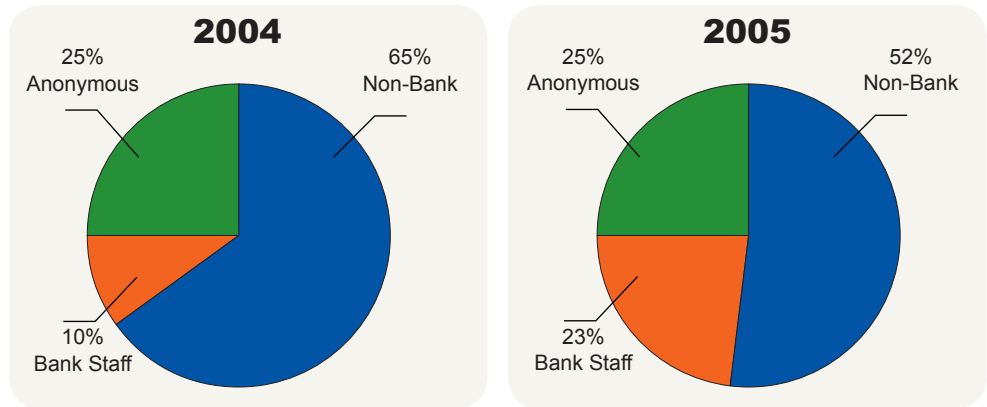
OII received a total of 157 inquiries in 2005; 138 were logged in as allegations, and 19 were categorized as consultations (which did not allege fraud, corruption or misconduct but did require further analysis or action by OII). Throughout the year, OII saw a significant increase in requests from Bank staff and third parties to consult on matters of integrity. OII has encouraged such consultations in order to identify potential issues early on and seek preventive measures that could preclude the need for investigations and sanctions.



NEW ALLEGATIONS

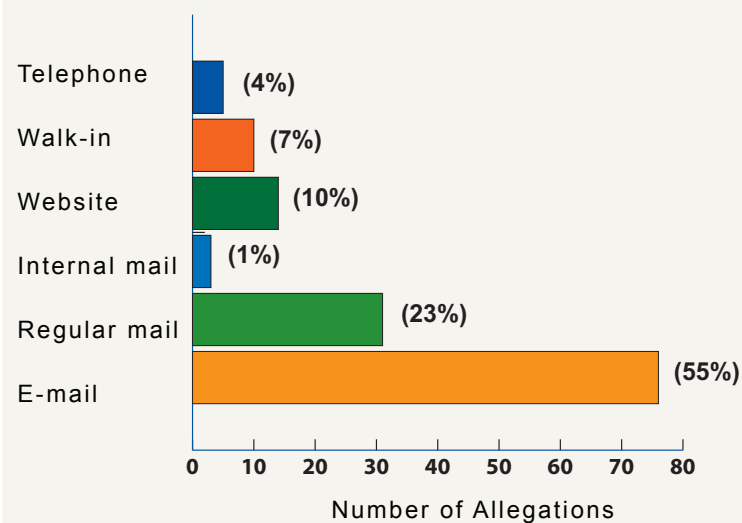
In 2005, the number of allegations reported by Bank staff more than doubled over the previous year, as can be seen in the figure below. The percentage of allegations made anonymously has remained steady at 25 percent.

Sources of Allegations in 2004 and 2005
(by percentage)



Complainants have continued to make use of the multiple portals that were set up to facilitate reporting to OII, as shown in the figure below.

How Allegations Were Submitted in 2005



INVESTIGATIONS COMPLETED

At the end of 2004, 117 cases remained under review. During 2005, OII gave priority to completing investigations of cases pending from the previous year, and, as described below, the majority of these older cases were resolved. The number of active cases from 2004, added to the 138 new allegations, led to a total of 255 cases under review in 2005. OII continued its efforts to complete investigations promptly and these efforts were met with success: investigations in 144 cases were completed – an increase of 64 percent over the number in 2004.

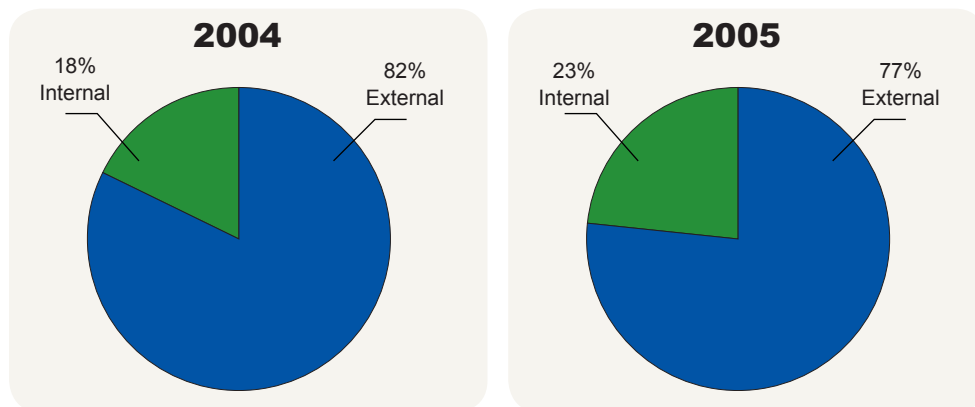
Case Flow: 2003 – 2005

	2003	2004	2005
Cases Pending from Previous Year	37	67	117
New Allegations	95	142	138
Total Active Cases	132	209	255
Investigations Completed	(65)	(92)	(144)
Cases Pending at Year's End	67	117	111

INTERNAL VS. EXTERNAL ALLEGATIONS

In 2005 there was a modest increase in the number of internal allegations, although the vast majority of allegations remained external, as can be seen in the figure below. Of the 142 new allegations made in 2004, 18 percent were internal and 82 percent external, compared to 23 percent internal and 77 percent external in 2005.

Percentages of Internal and External Allegations in 2004 and 2005



The figure below groups as internal or external the 255 active cases in 2005.

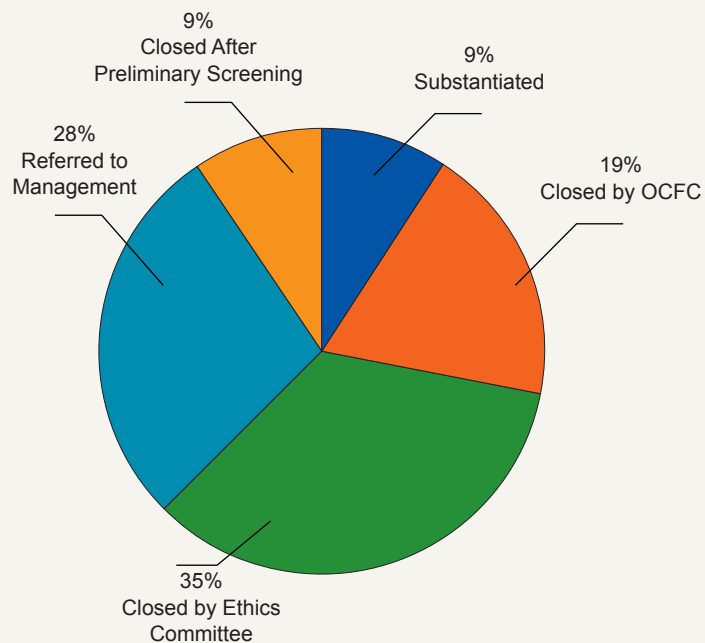
Active Cases in 2005

	Internal	External	Total
Cases Pending from Previous Year	14	103	117
New Allegations	32	106	138
Total Active Cases	46	209	255
Investigations Completed	(32)	(112)	(144)
Cases Pending at Year's End	14	97	111

INTERNAL CASES COMPLETED

At the start of the year, 14 internal allegations remained pending from the prior year. Throughout 2005, OII received 32 new allegations concerning the conduct of staff, for a total of 46 internal allegations under review during the 12 months. Of these, 32 cases were closed and 14 remained under review at the end of the year. The figure below shows the outcomes for the 32 internal cases completed in 2005.

Results of Internal Cases Completed in 2005



Examples of internal **substantiated** cases in 2005 include:

- A sector specialist in a Country Office manipulated a bidding process and provided fraudulent information to the Bank. The specialist's contract expired before the Ethics Committee could resolve the case, and her contract was not renewed. The final report from the Ethics Committee was placed in her file and she was debarred from future employment with the Bank based on the Ethics Committee's decision.
- A Bank employee was dismissed for embezzlement based on a decision by the OCF and the case was also referred to local criminal authorities. Local prosecution of the case was ongoing at the end of the reporting period.

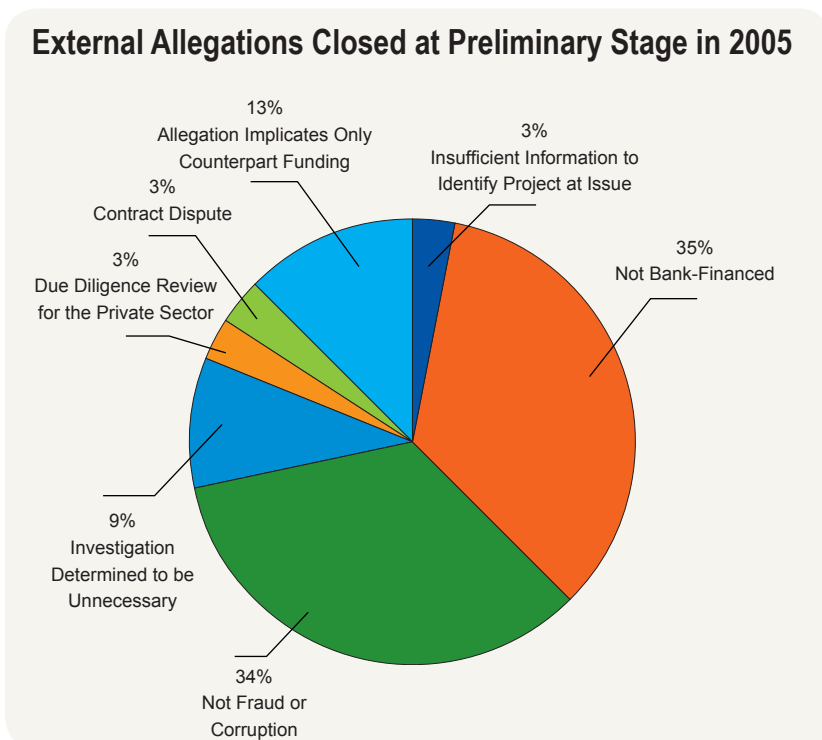
Internal **unsubstantiated** cases included:

- At the request of the Ethics Committee, OII conducted two separate investigations into allegations indicating staff misconduct in connection with the employment of G-5 domestic employees. In each case, OII concluded that the allegation was unsubstantiated and the Ethics Committee agreed.

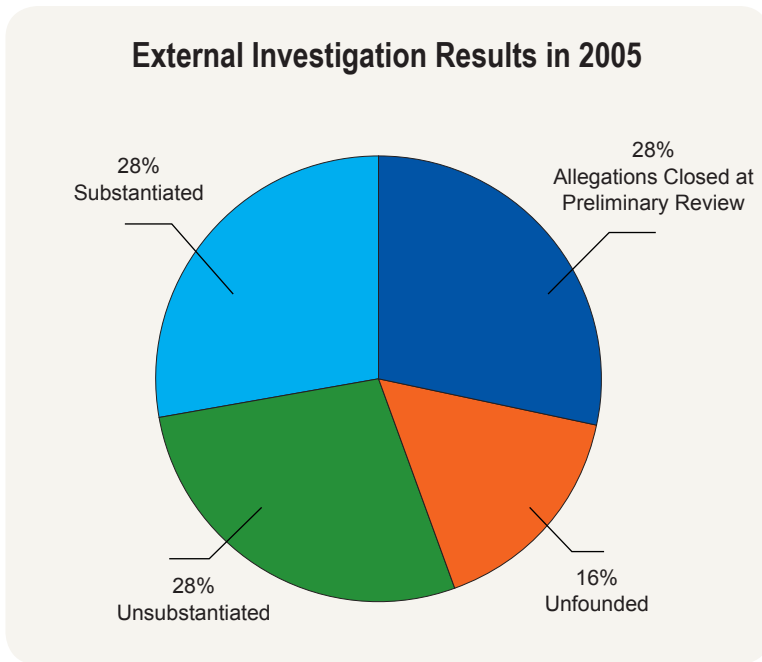
EXTERNAL CASES COMPLETED

As described above, all external allegations are preliminarily reviewed to determine if a full investigation is necessary. Approximately 28 percent of external cases were resolved and closed at the preliminary stage in 2005.

The figure below provides details of the 32 external allegations closed at the preliminary stage during 2005.



All told, OII completed 112 investigations of external cases during 2005. The results of these cases are summarized in the figure below.



SANCTIONS AND OTHER POST-INVESTIGATIVE ACTIVITIES

During 2005, the OCFC approved the issuance of notices of charges in 18 cases. These notices covered potential charges against 41 individuals and 20 firms. By the end of the year, the OCFC had imposed sanctions in five cases:

- A three-year period of ineligibility was imposed on one individual and one firm for directing contracts to a firm in which the individuals had a financial interest.
- A three-year period of ineligibility was imposed on five individuals and one firm for requiring consultants to give a portion of their fees as a kickback to the executing agency and also for directing a consultant to submit a false résumé.
- A one-year period of ineligibility was imposed on three individuals for submitting false résumés and university diplomas.
- Letters of reprimand were issued to two individuals and two firms for submitting fraudulent certificates of previous experience.
- A letter of reprimand was issued to a nongovernmental organization acting as an executing agency for the intentional submission of fraudulent or ineligible expenses.

Referrals to Member Governments

During 2005, nine referrals were passed on to member governments. These cases included evidence of:

- Embezzlement of Bank funds;
- Attempts to pass fraudulent Bank checks;
- Theft of personal checks from a Country Office;
- Improper manipulation of a tender offer by employees at an executing agency;
- A senior official at an executing agency directing the agency to rent office space that he owned;
- Fraudulent use of the Bank's name as part of a scheme to defraud potential investors; and
- Manipulation of terms of reference and hiring processes by executing agency staff to favor selection of certain consultants.

Assistance to the Private Sector Department

During 2005, OII received several requests for advice concerning integrity issues that arose in transactions involving the Bank's Private Sector Department. While these cases did not require traditional investigation by OII staff, they did call for careful review and analysis of integrity and due diligence issues. OII continues to work with the Private Sector Coordinator and a working group to develop procedures for evaluating integrity issues in future private sector transactions.

Investigative Results and Case Studies



During 2005, OII completed a number of investigations that led or were likely to lead to the imposition of sanctions. While sanctions can provide a strong deterrent, lessons can also be learned from investigations even when no fraud or corruption is found and no sanction imposed. For example, investigations can lead to evidence of violations of other Bank regulations, or can identify issues worthy of management's attention.

A number of examples of investigative results from 2005 are described below. Cases are organized according to the type of fraudulent or corrupt practice or misconduct involved.

FRAUDULENT PRACTICES

The single largest group of cases investigated involved fraudulent practices, including fraudulent claims of prior experience, forging or falsifying documents or résumés submitted to the Bank or to executing agencies, false representation in terms of reference, and misrepresentation of individuals participating in bids.

Claims of Prior Experience and Submission of Forged or Fraudulent Documents

Case 150:

An anonymous allegation was received claiming that a group of consultants had submitted falsified academic records. The allegation was reported by the executing agency, after a change in government and the appointment of new officials to head the executing agency. Moreover, audit reports for the project indicated, among other things, poor performance by some of the

same consultants. OII substantiated the allegation and was able to confirm that three consultants had provided false academic and professional records to obtain contracts with the executing agency.

Outcome: *The three consultants were declared ineligible for a period of one year. The fourth consultant, against whom the evidence was less compelling, received a letter of reprimand.*

Case 212:

During a review of a tender process, a sector specialist noticed that two certificates of prior work experience submitted by the winning bidder appeared to have been altered or forged. The investigation revealed that when the two certificates were physically placed one on top of the other, the signatures and seals were in exactly the same place on the page, suggesting they were photocopies. Moreover, when the firm at issue was asked for the original certificates, it submitted new certificates different from those that had been submitted with its bid. When pressed, the firm claimed that the original certificates of experience had been lost in a flood. It was further determined that the owner of the firm submitting the certificates had family ties to the firm that issued the fraudulent certificates.

Outcome: *Two firms and their managers were issued letters of reprimand.*

Case 251:

OII determined that a bidder fraudulently exaggerated prior experience to qualify for a Bank-financed contract. OII learned of the case because of the diligence exercised by the sector specialist in the Country Office supervising the project. OII contacted several public sector agencies for which the firm had allegedly done work. These agencies confirmed that the amount of experience claimed by the firm was, in fact, fraudulently inflated.

Outcome: *A notice of charges will be issued to the firm.*

Case 279:

An investigation was conducted into an allegation submitted by an executing agency that a firm had submitted forged documents in support of its bid. Investigation confirmed that the signature on a commitment letter and the contract had been forged. When the firm at issue was contacted, its representative admitted to the forgery and claimed he had done so in order to qualify for the project and that he believed the requirements of the terms of reference were excessive.

Outcome: *A notice of charges will be issued to the firm.*

Case 283:

An executing agency alleged that a firm had submitted forged documents in support of two bids. Investigation confirmed that a joint venture comprised of two firms had submitted at least three forged certificates of prior experience. The owners of each firm admitted submitting fraudulent documents. It was determined that the levels and dates of experience had been misrepresented. Moreover, the signatures verifying the experience had been forged.

Outcome: *Notices of charges will be issued to the firms.*

Case 259:

An executing agency submitted an allegation of fraud to the Bank. The investigation determined that a number of firms and individuals had submitted false and fraudulent documents in support of bids for Bank-financed contracts. One individual submitted numerous fraudulent contracts that falsely claimed he had completed certain work when the contracts had actually been issued to a different individual. Another individual submitted an altered certificate of completion that falsely claimed that work actually done in 1993 had been completed in 1998. A third bidder submitted forged certificates of work for projects in which the bidder had not participated. A fourth bidder submitted an expired certificate of enrollment in a particular registry with the expiration date altered to make it appear as though the certificate were current.

Outcome: *Notices of charges will be issued to the parties.*

Fraudulent Representations and Requests for Reimbursement

Case 186:

The complainant claimed that the executing agency had falsely inflated the tasks required by a terms of reference for a project to improve the registration of land titles. It was alleged that, in fact, the executing agency had already completed many of the tasks for which it was seeking financing from the Bank within a separate project financed by a bilateral development agency. The Bank project had not yet begun disbursements. The complainant claimed that the inflation of tasks was done intentionally to obtain funds from the Bank for unnecessary work. The investigation substantiated the allegation and the existence of inflated terms of reference. The land registry's inadequate filing system limited the ability to determine what land records had been fully registered.

Outcome: *Although no sanctions were issued, the results of the investigation were used by the Country Office to withhold payments until the executing agency submitted revised and accurate terms of reference and could demonstrate that it had implemented appropriate mechanisms to manage the project.*

Case 338:

A sector specialist noted that an executing agency financed by a technical cooperation grant had submitted a series of requests for reimbursement that were not supported by appropriate documentation. In some instances, these requests were for payments to consultants for contract extensions or fees over the amount stipulated in their contracts without a “no-objection” from the Bank. Because these are indicators of possible fraud and corruption, the sector specialist submitted a report of his findings to OII. While the investigation did not find sufficient evidence to conclude the existence of fraud or corruption, it was determined that a number of consultants had been paid amounts higher than those stipulated in their contracts and that the term of employment for several of these consultants had been extended without a “no-objection” from the Bank. Evidence of failure to follow Bank policies applicable to competitive hiring processes was also found.

Outcome: *The case was referred to Bank senior management for follow-up.*

Fraudulent Misrepresentation of Participants in Bidding Process

Case 257:

In this case, documentary evidence and statements of witnesses led to a finding that a group of firms participating in a bidding process submitted fraudulent or altered documents as part of their bids. These firms claimed that certain professionals were included in their bids when, in fact, these individuals said they were not aware that their names had been submitted. It was determined that the firms lacked their consent and had forged their signatures in the bid offer. At least one of the firms also falsified a public record allegedly indicating that it was certified to do business with the government.

Outcome: *The parties will be served with notices of charges.*

Misuse of the Bank’s Name and Forged Checks

Cases 176, 315, 234 and 307:

Several allegations identified the misuse of the Bank’s name or the name of high-ranking Bank officials, including the President, to defraud third parties. These schemes were often discovered when the potential victims contacted the Bank to check on claims by the perpetrators that they either represented the Bank or were acting on its behalf. In one case, an individual attempted to cash forged payroll checks.

Outcome: *Two of these cases were referred to national authorities, and one resulted in issuance of a notice of charges; in the fourth case the Bank issued a cease and desist letter.*

EXTORTION

In one case in which fraud was alleged, the evidence was insufficient to establish the existence of fraud, but evidence of extortion was found.

Case 191:

OII received an allegation that a firm had submitted fraudulent documents in a bidding process. Simultaneously, the accused firm submitted a protest to the executing agency claiming unfair treatment, which effectively stopped the contract award from moving forward while the protest was pending. Although the investigation could not confirm the allegation of fraud, it was determined that the owner of the firm had attempted to extort money from the executing agency in exchange for withdrawal of its protest.

Outcome: *The firm will be served with a notice of charges.*

CORRUPT MANIPULATION OF HIRING PROCESSES

This sample of cases involves efforts by executing agencies, individuals and in one case a Bank staff member to manipulate procurement processes for which they were responsible in order to direct the award of contracts to particular firms or individuals. A number of cases include findings that executing agencies created records of competitive processes, which in fact had not occurred. Several cases also include evidence of collusion, coercion and the use of fraudulent documents.

Case 175:

An investigation confirmed allegations by a former employee of an executing agency that the agency manipulated the hiring process in order to ensure candidates it favored were selected. The agency sought to fill a vacancy for an account executive. Initially, the terms of reference required a degree in accounting or business administration, but later were modified to permit a degree in engineering as well. The candidate who appeared to be favored by the agency was the only applicant with an engineering degree. A second position required candidates to hold a degree in accounting or business administration and five years of experience. Yet the position was awarded to a candidate with a pending degree and three years of experience. Moreover, the investigation could find no records of pre-qualification interviews of potential candidates. The OCFC concluded that the executing agency had deviated from acceptable contracting procedures in its effort to favor certain candidates, and at least one appeared not to meet the minimum qualifications.

Outcome: *The Country Office was directed to advise the executing agency of the findings.*

Case 190:

A complaint alleged that the mayor of a town had colluded with a firm to create the appearance of a competitive bidding process for a Bank-financed contract while ensuring that the firm at issue won the contract. Investigation confirmed that the mayor decided which companies would be invited to bid, and ultimately, he had the authority to decide on the winning firm. Moreover, the investigation determined that only the firm that had allegedly colluded with the mayor had actually received an invitation to bid. When the two other firms that had apparently participated in the bidding process were contacted, they stated they were completely unaware of the bidding process and that their firms had supposedly submitted bids. A review of the bidding documents for the two losing firms confirmed that the documents had been forged.

Outcome: *The case has been referred to national authorities.*

Case 271:

An OII investigation determined that an individual had obtained confidential information related to a tender process by falsely claiming to be a municipal employee. Still claiming to be a public employee, the individual then attempted to influence several public officials to award contracts to firms from which he hoped to obtain payments.

Outcome: *The case will be referred to national authorities and a notice of charges will be issued.*

Case 280:

An investigation was undertaken after OII received an anonymous complaint alleging manipulation of recruitment processes and short lists by an executing agency in order to provide unjustified preference to specific individuals. The investigation found indications of manipulation in the recruitment of at least three individuals, including manipulation of short lists to create a false appearance of competition. In several cases, the short lists contained names of individuals who had allegedly applied for the positions at issue, yet when contacted, these people said they had not been interviewed and did not even know they were on the short list. In several cases, the terms of reference required particular experience that only the favored candidates possessed, creating the appearance that the terms were intended to steer the contract to those individuals.

Outcome: *The Bank requested the executing agency to reimburse the Bank for disbursements related to the improperly conducted recruitment.*

Case 153:

A losing bidder submitted a complaint alleging manipulation of a bidding process to favor a firm that employed the wife of a staff member at an executing agency. Investigation failed to find evidence of fraud, corruption or favoritism. However, it was determined that the technical evaluation of bids had been altered so that each bidding firm would receive one contract. The motivation was discovered to be the desire for speedy project implementation; however, the conduct was found to be in violation of Bank procurement policies. Moreover, it was determined that the executing agency pressured the losing bidder to withdraw his complaint because of fears it would further slow project implementation.

Outcome: *No sanction was issued, but the case was referred to senior management for appropriate follow-up with the executing agency on proper compliance with Bank policies.*

Case 233:

A former employee of a nongovernmental organization acting as an executing agency submitted an allegation indicating that the program's director had colluded with an applicant to falsify his résumé to claim work experience he did not possess. Moreover, the director falsely claimed that a competitive selection process had occurred, when, in fact, several of the other candidates who supposedly had applied and been interviewed stated that they were not even aware of the existence of the position and had not interviewed for it. Three other hiring processes were randomly selected and reviewed. In each, evidence of manipulation was found, including findings regarding individuals who were never interviewed despite claims by the executing agency to the contrary.

Outcome: *Notices of charges will be issued against the executing agency and some of its officials.*

Case 252:

An anonymous allegation was submitted claiming that certain consultants were contracted by an executing agency without following Bank policies. The complainant claimed that one consultant was paid an "exorbitant sum" for a 30-day contract. OII did not find evidence of fraud or corruption. However, evidence did show that Bank procurement policies had not been followed in hiring and supervising the consultant. Moreover, it was determined that the consultant had failed to provide reports of his work, as stipulated in his contract.

Outcome: *It was agreed that the findings be sent to Bank senior management for further review and to determine what additional action is required.*

Case 263:

An allegation was received from the director of an executing agency claiming that a sector specialist approved hiring a consultant to work full time in the Country Office, even though the consultant was concurrently working full time for the executing agency on the same project. The complainant also alleged that the specialist had done the same with other consultants hired through the Bank. After receiving the allegation, the Country Representative terminated the consultant's contract because the consultant was unable to provide evidence of having delivered any work product. An investigation of the case was conducted at the request of the Ethics Committee. OII was able to determine that the specialist had submitted two résumés purportedly as proof of a competitive hiring process that included other candidates, when, in fact, neither had actually applied or been interviewed for the position.

Outcome: *A notice of charges will be issued to the consultant.*

CORRUPTION AND SELF-DEALING

This sample of cases involves evidence of self-dealing by individuals who took improper actions to benefit themselves, motivated by financial or other reasons.

Case 123:

A Country Office reported to OII that it had discovered indications of a possible conflict of interest between an adviser at an executing agency and a firm that had been awarded several contracts by that agency. During the course of the investigation, OII obtained evidence confirming that the subject under investigation had recommended the executing agency award contracts to a firm he owned. Moreover, in his role at the executing agency, the individual was responsible for receiving and approving bids, including those from his own firm, which he recommended be awarded contracts. He also submitted recommendations to the agency's executive director regarding payments to his firm. When confronted with the evidence, the individual admitted he owned the company at issue but asserted that his conduct was acceptable since his firm had presented a valid offer and had performed satisfactorily.

Outcome: *Upon disclosure of the evidence, the executing agency decided not to renew the subject's contract. After issuing the subject a notice of charges, the OCFC declared him and the firm ineligible from participating in Bank-financed operations for a period of three years.*

Cases 236 and 242:

In two related cases, allegations were submitted to OII claiming that an executing agency was renting office space in a building owned by the agency's director. It was also alleged that the director was using project resources and staff to support his campaign for elective office. An investigation determined

that the director had indeed rented an office building he owned to the executing agency. In an attempt to hide the transaction, he executed a sale of the property to a colleague, but several days later rescinded the sale through a “private” sales contract. Moreover, with one exception, the employees of the executing agency were all members of the director’s political party. Witnesses provided confidential statements indicating that they were required to help with the director’s political campaign as a condition of employment, and that project vehicles and office supplies were used for the campaign.

Outcome: *The results of the investigation were referred to national authorities.*

KICKBACKS AND EMBEZZLEMENT

These cases involve evidence of payment of kickbacks in one case and embezzlement of Bank funds in a second case.

Case 277:

An executing agency falsified several consultants’ résumés, misrepresenting their employment status so they would qualify to work on a project. Moreover, the investigation determined that the agency – a nongovernmental organization – demanded that consultants hand over a portion of their salaries to the agency in exchange for continued employment. The OII investigation also confirmed that the agency required the consultants to invoice both the Inter-American Development Bank *and* the World Bank for work done on the project, in an attempt to collect double payments for the same work.

Outcome: *The OCFC declared the executing agency and five of its senior officers ineligible from participating in Bank-financed activities for three years. It also approved referring the investigative findings to national authorities and the World Bank.*

Case 365:

A Bank employee noticed that payments to a consultant were being debited from an inactive accrual account, yet no supporting documentation had been submitted for the payments. Further investigation revealed that the Bank had not employed any such consultant and that the bank accounts receiving the payments on behalf of the fictitious consultant belonged to a staff member. It was determined that the employee had embezzled more than \$400,000 over a ten-year period.

Outcome: *The employee was fired and the case was referred to national authorities. The Bank has undertaken efforts to recover the embezzled funds and to review the internal mechanisms at issue.*

BANK'S G-5 POLICIES AND COMPLIANCE WITH NATIONAL LAW

Two cases involved allegations of violations of the Bank's policies on the G-5 visa program for household employees.

Cases 156 and 316:

These two cases dealt with allegations of potential misuse by staff members of the visa benefit for foreign household employees. OII completed two investigations into allegations related to the treatment of these employees, but did not substantiate the allegation in either case.

Outcome: *OII recommended that the Bank's current policy framework be reviewed and updated to include best practices. Specifically, OII recommended updating the regulatory framework and enhancing the monitoring functions of the Bank, in order to prevent situations that might lead to violations of the Code of Ethics or national laws.*

MOVING TOWARD PREVENTION: LESSONS LEARNED

While OII has completed investigations in more than 200 cases, the data collected thus far is anecdotal and still insufficient for detailed analysis and identification of trends. As more investigations mature and additional results become available, OII will be able to derive more robust conclusions from its investigations. Specifically, OII will explore the possibility of quantifying both the cost of corruption and the impact of the Bank's integrity mechanisms.

However, the available data does provide some opportunity for preliminary conclusions and recommendations to improve policies and practices so that the Bank can prevent fraud and corruption before they occur.

Certainly a strong deterrent available to all multilateral development banks is the effective imposition of sanctions within an appropriate system of internal controls. Debarring firms and individuals, either for a period of time or permanently, sends a clear message that the Bank will not tolerate fraud or corruption in the activities it finances.

Beyond deterrence, other opportunities also exist to improve Bank measures to reduce or eliminate the recurrence of common corrupt practices. As part of its mandate, OII will provide recommendations based on investigative findings to the President, senior management, and appropriate Bank committees.

Prevention Through Outreach and Other Initiatives



Growing priorities for OII in 2005 included an emphasis on prevention through education and training and improving the existing policies and integrity mechanisms. OII has sought to reach out to Bank staff – both at headquarters and in Country Offices – as well as to those responsible for executing Bank-financed projects, borrowing countries' own anticorruption enforcement mechanisms, and the broader international financial and development community.

Together, these initiatives form OII's prevention strategy consistent with the document *Strengthening a Systemic Framework Against Corruption for the Inter-American Development Bank*. This strategy includes not only ensuring the integrity of staff and keeping Bank-financed projects free of fraud and corruption, but also supporting programs that will help borrowing countries strengthen good governance, enforce the rule of law, and combat corruption. The activities described below were undertaken to help improve the Bank's ability to prevent fraud or corruption before it occurs, build member countries' capacity to do the same, and leverage the resources and policies of the international development community.

OUTREACH AND SUPPORT FOR STAFF AND THE BANK COMMUNITY

OII continues to give the highest priority to educating the Bank's staff, executing agencies, and others working with the Bank on its internal integrity mechanisms. Outreach efforts were expanded in 2005 to include executing agencies as well as firms and consultants involved in the execution of Bank-financed projects. Moreover, OII was able to use its expertise and insight from lessons learned to support improvements in due diligence in private sector lending and provide input to Bank operational departments on projects containing transparency and integrity components. OII hopes to dedicate an increasing percentage of its resources to these types of activities.

Revision of Code of Ethics

During 2005, OII, along with a number of other Bank departments, supported the Legal Department in developing a revised Code of Ethics and Procedures for the Ethics Committee.

OII also worked closely with the Bank's Office of Learning in the Human Resources Department to develop an ethics training course for Bank staff in anticipation of the release of the revised Code of Ethics in early 2006. The training program is designed to provide staff members with information on the content of the new Code, as well as basic guidance on how to request advice and report wrongdoing.

OII drafted a proposal for a new financial disclosure system to be implemented under the new Code of Ethics. The proposal – the result of an extensive assessment of national models and the experience of comparable organizations – will be implemented after the new Code is adopted.

Outreach and Education Activities for Staff and Borrowers

OII also expanded efforts to educate both Country Office staff and local partners on the Bank's integrity initiatives and on OII's mandate and work. When on mission, OII staff expanded outreach efforts to include presentations not only to Country Office staff but also to executing agencies, firms, and consultants working on Bank-financed projects. Presentations in 2005 were made in Brazil, Costa Rica, Guatemala and Uruguay.

OII regularly takes part in presentations in the Business Seminars Series organized by the Office of External Relations. Participants include firms and individuals who are current or potential contractors in Bank-financed activities. OII's presentations review the Bank's anticorruption regulations, particularly the mechanisms to prevent and report fraud and corruption.

OII routinely makes presentations at the mandatory entry seminar for new Bank staff, providing participants with a description of OII's work, an explanation of the rules and mechanisms to combat fraud and corruption in Bank-financed operations, and suggestions on how and when to seek OII's assistance.

Connecting with Operational Units in the Bank

OII staff members were asked on several occasions to participate in consultations with Bank operational units engaged in state modernization projects that had integrity components. For example, OII provided input to initiatives in Regional Operations Department II to enhance transparency and integrity components in projects under analysis. OII staff members were also requested to participate in a Quality at Entry exercise in two separate projects that included components to enhance transparency and effectiveness in the public sector.

Private Investment Due Diligence

OII worked closely with the Office of the Private Sector Coordinator to establish a working group within the Bank to develop due diligence procedures for the Bank's private sector operations. Implementation of the working group's recommendation is anticipated to take place during the first half of 2006. These procedures will most likely include an increased role for OII in the review of private sector transactions in which integrity issues arise.

SUPPORT FOR BORROWING COUNTRIES' INVESTIGATIVE CAPACITY

Much work has been done to measure the causes and impacts of corrupt activities. However, less emphasis has been placed on improving the processes by which allegations of corruption are received, investigated, and prosecuted by national authorities; and on identifying obstacles to carrying out each stage of an investigation successfully. An effective anticorruption program must have credible enforcement and deterrence mechanisms. To this end, during 2005, in coordination with other departments of the Bank, OII applied its expertise to developing and implementing training activities for member countries' prosecutors and investigators of fraud and corruption. It is anticipated that the Bank group's growing support for these types of activities will lead to substantial improvements in member countries' own anticorruption enforcement mechanisms.

Workshop on Investigation and Prosecution of Corruption

In March 2005, OII organized a workshop for prosecutors and investigators from 19 Latin American and Caribbean countries to improve their capacity to investigate fraud and corruption and to integrate Bank efforts with the work of national authorities. In developing the workshop and identifying participants, OII worked closely with staff at Bank headquarters and in Country Offices, including the Legal Department, the Sustainable Development Department, the Office of the Auditor General, and representatives from the State and Civil Society Divisions of each of the three Regional Operational Departments.

This event marked the first time a multilateral development bank had engaged in a discussion with public officials about honing their capacity to investigate corruption. During the three-day workshop, prosecutors and investigators – with the guidance of experts from other multilateral development banks, international organizations and national governments – analyzed a hypothetical case study of corruption to review the key elements of the standard investigative procedures: in-take of allegations, allegations from anonymous sources, witness protection, reporting results and obtaining international cooperation.

The workshop helped identify existing obstacles to effective investigations of corruption and possible solutions, a number of which may warrant future support from the Bank or other multilateral or bilateral development organizations. Participants expressed a strong desire to replicate the workshop on a sub-regional level and expand its contents. OII is continuing to work with other Bank units to develop these capacity-building activities.

Go to: www.iadb.org/integrity/AR_links.cfm for more information.

Seminars for Prosecutors on the United Nations Convention Against Corruption

OII has cooperated with other international organizations to promote the effective implementation of the United Nations Convention against Corruption. As part of this effort, OII co-organized two seminars with the United Nations Office on Drugs and Crime and the Organization for Economic Co-operation and Development, hosted in Buenos Aires by the Argentine government. Attendees included a number of participants from the training workshop organized by OII in March. The Bank provided logistical and financial support, permitting a number of local prosecutors to attend.

One seminar, “Training of Specialized Prosecutors and Investigators on Anticorruption Measures for Latin America,” covered various aspects of investigation and prosecution of corruption cases, including multilateral cooperation and assistance, and financial investigations. OII presented information on Bank mechanisms to prevent and investigate fraud and corruption in Bank-financed activities. The other seminar, “High-Level Anti-Corruption Seminar for Latin American and Spanish-Speaking Caribbean Countries,” sought to identify the legislative tools needed by the countries in the region to ratify and implement the United Nations Convention against Corruption.

Participants in these seminars underscored the need for continued training and capacity building, both on a national and sub-national level, as the region looks toward effective implementation of the convention and other legal instruments.

Go to: www.iadb.org/integrity/AR_links.cfm for more information.

JOINT INITIATIVES WITH OTHER INTERNATIONAL ORGANIZATIONS

In recent years there has been a groundswell of support among international organizations to tackle the problems of corruption. The effectiveness of this initiative can be greatly increased through a coordinated and cooperative approach. OII has taken a main role in supporting these efforts, representing the Bank group in various joint forums. A harmonized approach within the international community is key to ensuring sustainable improvements in fighting corruption in member countries.

Harmonization among the Multilateral Development Banks

On behalf of the Bank group, OII is taking a leading role in facilitating a dialogue among the multilateral development banks – including the African Development Bank, the Asian Development Bank, the European Bank for Reconstruction and Development, and the World Bank – to move toward a more harmonized approach to detecting and preventing fraud and corruption in Bank-financed activities.

Throughout 2005, a series of meetings were held (several were hosted by OII) to produce harmonized definitions of fraud and corruption as well as guidelines for investigations. These initiatives are currently under review by each of the respective institutions.

During 2005, OII participated in a number of roundtable discussions on the subject of ethics in international financial institutions. Topics included comparison of integrity policies and practices, such as codes of conduct, whistleblower regulations, and financial disclosure mechanisms.

Sixth Conference of International Investigators

In June, OII hosted the Sixth Annual Conference of International Investigators. The meeting served as a forum to identify best practices and exchange experiences on investigation of fraud, corruption and misconduct among international and multilateral organizations. The conference included discussions on such topics as policies on whistleblowers and complaint receipt, overlapping competencies and responsibilities, investigative due process, disclosure of interests, third-party accountability, open-source and database research, and referrals to national authorities.

The Chief of OII continues to serve as a member of the Conference Secretariat responsible for planning future annual conferences and improving international cooperation among integrity and anticorruption offices of international organizations.

Go to: www.iadb.org/integrity/AR_links.cfm for more information.

International Group of Anticorruption Coordination

OII represented the Bank at the Seventh Meeting of the International Group for Anticorruption Coordination. The meeting's goal was to identify ways to prevent and detect fraud and corruption in disaster and emergency relief operations. Based on experience gained from past relief efforts, the meeting explored recurrent patterns of alleged corruption, as well as prevention and control mechanisms. Also discussed were mechanisms to implement the United Nations Convention against Corruption and improvements in information exchange among international organizations.

Go to: www.iadb.org/integrity/AR_links.cfm for more information.

International Group of Experts on Corruption

In 2005 OII was invited to join the International Group of Experts on Corruption. The chief of OII attended the Sixteenth Meeting hosted by the Interpol Secretariat. The meeting focused on the completion of global standards for combating corruption in police forces and further planning for the creation of an Anticorruption Institute, whose two main goals will be to improve capacities to investigate and prosecute corruption crimes and to develop a competent core of anticorruption experts.

United Nations Congress on Crime Prevention and Criminal Justice

OII represented the Bank at the Eleventh United Nations Congress on Crime Prevention and Criminal Justice. The congress, which is held every five years, focused on strategic alliances in crime prevention and criminal justice, including threats and trends of corruption in the twenty-first century.

Go to: www.iadb.org/integrity/AR_links.cfm for more information.

PRESENTATION ON ACCESS TO INFORMATION

OII, along with the Office of External Relations and the Sustainable Development Department, organized the seminar “Development, Accountability and Access to Information.” The seminar, which took place in July at Bank headquarters, featured the presentation of the Organization of American States’ Annual Report of the Special Rapporteur on Freedom of Expression. The presentation included a discussion on the importance of access to information as a means of ensuring accountability. This was the first time the Special Rapporteur presented an annual report before a multilateral development bank.

The Road Ahead



The Office of Institutional Integrity will continue to build upon the results obtained in 2005 while working toward meeting the following strategic goals during 2006:

- Increase OII's capacity to manage cases and allegations within a reasonable time frame by finalizing implementation of an electronic management system, among other measures.
- Expand OII's efforts to prevent corruption by improving its capacity to analyze results and extract lessons learned from investigations and communicate these results effectively to relevant parties inside and outside the Bank.
- Develop proactive mechanisms to detect and prevent corruption, including detailed implementation reviews of project portfolios.
- Support implementation of the Bank's new integrity framework, including helping introduce the new Code of Ethics and the new financial disclosure system, and help design and implement the ethics training program for Bank staff.
- Develop a more robust communication strategy to increase awareness and understanding among staff and outside parties of the anticorruption strategy at the Inter-American Development Bank group.
- Continue to assist borrowing countries interested in increasing their capacity to investigate and prevent fraud and corruption through training and information-sharing activities.
- Maintain ongoing dialogue with the community of multilateral development banks and international organizations to explore ways to share and leverage experiences and harmonize practices.
- Work with other Bank departments to review and enhance the Bank's efforts to fulfill the mandate set forth in the document *Strengthening a Systemic Framework Against Corruption for the Inter-American Development Bank*.

Instructions for Making International Collect Calls:

- Dial the access code for the country you are calling from (see table).
- An operator or a voice message will answer and ask you to dial the number you would like to call.
- Dial **877-223-4551** (do not dial 1 or 0 before dialing this number).
- An operator will answer "Thank you for calling AT&T" and will connect your call to our office where you will hear an introductory message
- Then you will be asked to select the language of your preference: English, Spanish, French or Portuguese.

Country	Access Codes		
Argentina	0-800-555-4288	0-800-222-1288	0-800-288-5288
Austria	0-800-200-288		
Bahamas	1800-872-2881		
Barbados	1800-872-2881		
Belgium	0-800-100-10		
Belize	811	555	
Bolivia	800-101-110	800-101-111	
Brazil	0800-890-0288	0800-8888-288	
Canada	1-800-225-5288		
Chile	800-225-288	800-360-311	800-360-312
	800-800-311	800-800-312	800-800-288
Colombia	01-800-911-0010	01-800-911-0011	
Costa Rica	0-800-0-114-114		
Croatia	0-800-220-111		
Denmark	8001-0010		
Dominican Republic	11 22		
Ecuador	1-800-225-528	1-800-999-119	
El Salvador	800-1785		
Finland	0-8001-10015		
France	0800-99-00-11	0805-70-12-88	
Germany	0-800-2255-288		
Guatemala	99 99-190	138-126	138-120
Guyana	159		
Haití	183		
Honduras	800-0-123		
Israel	1-80-94-94-949		
Italy	800-172-444		
Jamaica	1-800-872-2881	872	
Japan	005-39-111	0066-55-111	0044-11-111
Mexico	01-800-288-2872	001-800-462-4240	01-800-112-2020
Nicaragua	1-800-0174	1-800-0164	
Netherlands	0800-022-9111		
Norway	800-190-11		
Panama	800-0109	800-2288	
Paraguay	008-11-800	Available only in the city of Asuncion.	
Peru	0-800-50-000	0-800-50-288	0800-70-088
Portugal	800-800-128		
Spain	900-99-00-11		
Suriname	156		
Sweden	020-799-111		
Switzerland	0-800-89-0011		
Trinidad & Tobago	1-800-872-2881		
United Kingdom	0800-89-0011	0500-89-0011	
United States	1-800-225-5288		
Uruguay	000-410		
Venezuela	0800-2255-288	0800-5526-288	

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