

## RESTRICTIONS ON CURRENT AND FORMER BANK GROUP STAFF AND ELIGIBILITY OF BANK GROUP VENDORS

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**The Bank Group's Corporate Procurement Policies and Procedures contain the following policy regarding vendor eligibility of entities affiliated with current and former Bank Group staff:**

*Current and former Bank Group staff, regardless of appointment type held [including but not limited to Regular, Local Staff Regular, Open-ended, Term, Executive Director's Assistant, Special Assignment, Short Term Consultant (STC), Short Term Temporary (STT), Extended Term Consultant (ETC), Extended Term Temporary (ETT), and Junior Professional Associate (JPA)], are ineligible to be Bank Group vendors or subcontractors to Bank Group vendors, whether as sole proprietors or independent contractors, during their appointment and for a period of twelve months ("Cooling Off Period") from the termination date of their Bank Group appointment. This Cooling Off Period also applies to companies in which a current or former Bank Group staff member is an owner, principal, director or officer, or holds a financial interest. The Cooling Off Period also applies to companies with which close relatives (spouses, parents, full and half siblings, children, aunts, nieces, nephews and domestic partners) of current or former Bank Group staff are owners, principals, directors or officers, or hold a financial interest. In the context of the Cooling Off Period, "financial interest" does not include negligible stock holdings in entities listed on the S&P 1200.*

**The Bank Group's Staff Rules contain restrictions on current and former Bank Group Staff with respect to future employment with the Bank Group and future employers.**

### FREQUENTLY ASKED QUESTIONS REGARDING THESE POLICIES

**1. Are all appointment types subject to the Bank Group's staff rules and procurement policies?**

Yes, all appointment types including but not limited to Short Term Consultant (STC), Short Term Temporary (STT), Extended Term Consultant (ETC), Extended Term Temporary (ETT), Junior Professional Associate (JPA), Regular, Local Staff Regular, Open-Ended, Term, Executive Director Assistant and Special Assignments are subject to the Bank Group's staff rules and procurement policies.

**2. As a Short-Term Consultant (STC), am I a Bank Group staff member or an independent contractor?**

For the duration of your service as an STC, you are considered to be a Bank Group staff member subject to the Staff Rules and applicable Bank Group policies.

**3. I have never worked for the Bank Group until now. Are there time limits on my STC appointment?**

Under the current Bank Group Staff Rules, you may work for a maximum of 150 days in any Bank Group fiscal year (July 1-June 30). Note: if you are a Bank Group retiree, the limit is 190 days in a fiscal year.

**4. What is the reason for the 150 day / 190 day limitations??**

STC appointments are used to allow the Bank Group to obtain specialized skill sets for a limited duration. The Bank's Board decision to limit the number of days is intended to ensure the

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appropriate use of the STC appointment type. The limitation on the number of days is subject to change.

**5. I am a former Bank staff member and have been working in the Bank Group through an outside vendor. Are the days that I have worked at the Bank Group through this outside vendor counted towards the 150 day limit?**

Yes. You are limited to 150 days during any Fiscal Year whether you are working as an STC or through an outside vendor. However, after the end of the fiscal year in which you worked as an STC, you may work through an outside vendor at the Bank Group with no limit on the number of days. The Staff Rules, including the conflict of interest provisions of Staff Rule 3.02, para. 4.02, would also apply.

**6. I have reached the 150 (190) day on my STC appointment. May I continue working for the Bank Group by working through an outside vendor?**

No. The Bank Group's policies prohibit you from working beyond the 150/190 day limit in the same fiscal year whether as an STC or by working through an outside vendor.

**7. I have worked as an STC for the Bank for less than 150/190 days in this Fiscal Year. I would like my company to become a Bank group vendor. May I do this?**

Not immediately. To avoid any actual or perceived conflict of interest problem, Bank Group policy requires a 12 month cooling off period from the date your appointment terminates before an entity in which you are an owner, officer, partner or board member or have a financial interest is eligible to receive Bank Group contract awards. Subject to the Bank Group conflict of interest rules, you may, at the termination of your appointment, provide services to the Bank Group as an employee of an outside vendor without being subject to the twelve month waiting period.

**8. Does this cooling-off period also apply to vendors with which a relative is connected?**

The cooling-off period applies equally to entities where certain categories of relatives, including spouses, parents, full and half siblings, children, aunts, nieces, nephews and domestic partners are an owner, officer, partner or board member or companies where the relative has a financial interest.

**9. I am a current Bank Group staff member and my spouse is the owner of a company. May my spouse's company become a Bank Group vendor?**

No. Your spouse's company and any company in which you are an owner, officer, partner or board member or in which you have a financial interest, is ineligible to become a Bank Group vendor and / or receive a Bank Group contract award for a period of 12 months from the termination of your appointment.

**10. My sister owns stock worth \$10,000 (representing less than 2% interest in the company) in a billion dollar company listed on the S&P 1200. Is this company restricted from becoming a Bank Group vendor?**

Not by virtue of the fact that your sister owns \$10,000 in stock in this company. Although your sister has a financial interest in this company, the value and amount of stock she holds is considered negligible and would not, in and of itself, restrict the company from becoming a Bank Group Vendor. The company should consult Corporate Procurement's Vendor Kiosk for additional information on vendor eligibility criteria. ([www.worldbank.org/corporateprocurement](http://www.worldbank.org/corporateprocurement)).

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**11. I own stock worth \$15,000 in a company that is bidding on a World Bank Request for Proposal. May I participate in the selection process??**

No. The Corporate Procurement policies require staff to avoid real or apparent conflicts of interest with respect to the Bank Group's vendor relationships. Staff having financial, personal or professional interests in a Bank Group vendor or in a company that is bidding on Bank Group procurements have a duty to disclose such real or apparent conflict of interest to Corporate Procurement and their manager and to disqualify themselves from any involvement in the selection process and management of any vendor contracts.

**12. Does this cooling-off period also apply to non-profit organizations?**

Yes. The 12-month cooling-off period applies to non-profit organizations and non-profit corporations where a current or former Bank Group staff member is an officer or board member or has a financial interest in the organization or corporation.

**13. My STC appointment is ending next month and I want to register a firm that I am on the Board of. Are there any restrictions?**

Yes. Since you are on the Board of this firm, the firm is ineligible to receive Bank Group contract awards for a period of 12 months from the end date of your appointment. The firm can only register as a Bank Group vendor at the expiration of the 12 months.

**14. My son owns a firm that would like to do business with the Bank Group. Are there any restrictions?**

Yes. Your son's firm is ineligible to receive Bank Group contract awards for a period of 12 months from the termination date of your appointment.

**15. My STC appointment has just ended. May a company that I own be a subcontractor under a Bank Group contract with another vendor?**

No. The 12 month cooling off period applies to your firm as a direct contractor to the Bank Group and as a subcontractor to another Bank Group contractor.

**16. Does the Bank Group impose restrictions on subsequent employment I may wish to undertake outside the Bank Group after my Bank Group appointment ends?**

Yes. The Bank Group Staff Rules on conflict of interest impose a limitation on all current and former Bank Group staff, including STCs. Within two years after separation from Bank Group employment, former staff members may not perform services for any other entity or person related to an activity in which the Bank Group has an interest or is a party and in which they participated personally and substantially during their employment with the Bank Group. Questions regarding this policy should be directed to the Human Resources Department or the Office of Ethics and Business Conduct.

**17. My appointment has ended and I have waited out the twelve month cooling-off period. Are there any other requirements for my registering as a Bank Group vendor?**

Yes. You must meet the same eligibility qualifications that all Bank Group vendors must meet. At a minimum, you (i) must have been operating your business for a minimum of twelve months (ii) must have other clients in addition to the Bank Group (iii) must have in hand all necessary

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business licenses, registrations and insurances appropriate to the work you are seeking (iv) must be financially capable of carrying out the work you are seeking and (v) may not derive more than 20 percent of your annual revenue from the Bank Group.

***18. May I have more than one STC appointment at a time or sequential appointments for work within the Bank Group?***

Yes. Subject to the Bank Group conflict of interest rules, you may have concurrent or sequential STC appointments within the Bank. However, the total number of days combined from all such appointments may not exceed the 150 (190) day limit.

***19. May I be employed outside the Bank Group while holding an STC appointment?***

Yes, subject to two restrictions. First, you may not be concurrently employed by member governments or other entities to work on Bank Group-financed projects if the Bank Group-financed project and the concurrent work involve the same country. Second, you cannot be an employee of another public entity, including, but not limited to, governments and other international organizations, unless that entity has approved your concurrent work with the Bank Group.

***20. I currently hold an STC appointment. Can I also work for the Bank Group through a Bank Group vendor (that I have no ownership interest in)?***

No. During the period of your appointment, you may only provide services as an STC and cannot also work for the Bank Group through a vendor. This is to prevent an apparent or real conflict of interest.

***21. I am a former Bank staff member. I am not eligible under the Bank Group Staff Rules to be reappointed to the staff of the Bank Group. May I provide services to the Bank Group as a Bank Group vendor?***

No. If you are not eligible to be reappointed as a Bank Group staff member, you are also not eligible to provide services to the Bank Group in any vendor capacity.

***22. I'm working as an STC at the Bank. I am also an employee of another company where I work during the period when I am not working at the Bank Group. Can the company that I work for receive a Bank Group contract award?***

Provided that you and/or your close relatives (spouse, parent, full and half sibling, son/daughter, aunt, niece, nephew and domestic partner) are not an owner, officer, partner or board member and do not have a financial interest in the company, the company is eligible to apply for Bank Group vendor status.

***23. I'm currently working as an STC. I understand that the company that I own is not eligible to receive a Bank Group contract for a period of 12 months from the termination of my STC appointment. Can I market my company's services to the Bank Group while working at the Bank?***

No. This would be a conflict of interest and is not permitted under the Bank Group's policies.