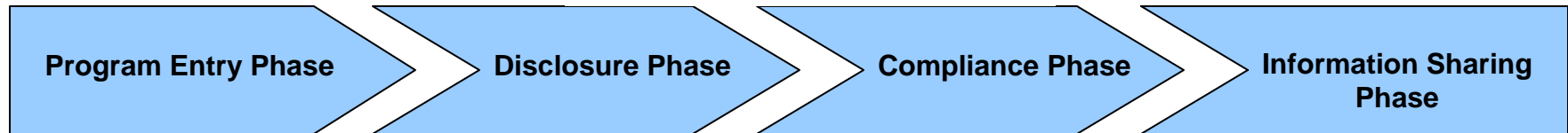




World Bank
Department of Institutional Integrity (INT)
Voluntary Disclosure Program (VDP)



VDP Overview Diagram



Participant Actions

- | | | | |
|---|--|--|---|
| <ul style="list-style-type: none"> • Initial contact to World Bank (through submission of the VDP Entry Request Form) • Complete Background Data Sheet • Accept the VDP Terms & Conditions | <ul style="list-style-type: none"> • Classify contracts in World Bank projects as tainted/untainted by misconduct • Conduct the Internal Investigation • Submit the Internal Investigative Report to the World Bank | <ul style="list-style-type: none"> • Implement a best-practice Compliance Program • Hire an independent Compliance Monitor | <ul style="list-style-type: none"> • Notify the World Bank of any misconduct • Take appropriate actions to resolve misconduct |
|---|--|--|---|

World Bank Actions

- | | | | |
|---|--|---|--|
| <ul style="list-style-type: none"> • Confirmation of the Background Data Sheet • Determine eligibility to enter into the VDP • Initial meeting with potential participant to explain VDP programmatic elements | <ul style="list-style-type: none"> • Sampling exercise of tainted/untainted contracts • Approve the participant's Internal Investigation Plan • Verification exercise of the results of the participant's Internal Investigation Report | <ul style="list-style-type: none"> • Identify additional ethics and compliance measures • Approve the Compliance Monitor • Annual review of Monitoring Reports | <ul style="list-style-type: none"> • Produce the Full Bank Report Based upon investigative findings • Produce Redacted Reports • Open cases of implicated firms and World Bank staff • Disclosure missions to World Bank member countries • Share results within World Bank • Share results with targeted external audiences (MDB's anticorruption NGOs) |
|---|--|---|--|