1. INTRODUCTION

This is the fourth annual report of the Independent Advisory Board (IAB). It covers the work of the IAB in the calendar year 2012.

The IAB takes this opportunity to thank President Kim, Ms. Sri Mulyani Indrawati, Managing Director; the Audit Committee; Leonard McCarthy, Vice-President, Integrity Vice-Presidency (INT); Joachim von Amsberg, Vice-President, Operations Policy and Country Services (OPCS); and other senior management and staff who assisted the IAB through the year. The IAB has consulted widely within the Bank and with outside stakeholders who have assisted it to shape its views and formulate recommendations contained in this 2012 annual report. Annexes 1 and 2 provide more details on the IAB agenda and those it consulted during 2012.

2. MEETINGS SINCE LAST REPORT

The IAB has convened for two face-to-face meetings since its last report: (i) in Washington, DC from June 4 to 7, 2012 and (ii) in New Delhi, India from December 5 to 8, 2012.


The IAB convened its Washington meeting to coincide with the second biennial meeting of the International Corruption Hunters Alliance (ICHA) hosted by INT. The Board led and facilitated a dialogue with representatives of national anti-corruption authorities on how to create synergies between ICHA and national authorities to promote greater effectiveness. The dialogue: “Measuring the Results of Anti-Corruption Authorities: An Expert Panel by the World Bank’s Independent Advisory Board” attracted a very high level participation and was of mutual assistance to the Bank and national anti-corruption agencies.

The IAB reported to President Robert Zoellick during his de-brief before leaving Office at the end of June. The Board discussed with the Regional Vice-Presidents their relationships with INT and ways to improve its effectiveness. They met Ms. Anne-Marie Leroy, Vice-President, Legal Vice Presidency (LEG) and General Counsel and others to share their views on the Sanctions Review. The Board had the occasion to congratulate the new chair of the Sanctions Board, Mr. Yves Fortier, on his appointment and to share their perspectives on the sanctions process with him. Meetings included among others the Audit Committee and the Governance and Anti-Corruption (GAC) Steering group.
b. December – New Delhi, India

In December, the IAB held discussions with representatives from federal and state-level governments, development partners, civil society organizations and the private sector in India. They centered on the effectiveness of INT investigations and how to address fiduciary risks in projects and programs supported by the Bank. The Board travelled to Patna in the State of Bihar to visit the “National Vector Borne Disease Control Project” (value: SUS 521 million). The Board discussed challenges of project implementation with citizens, project staff and other stakeholders involved in the health sector. The dialogue centered on ways to improve transparency, accountability for the use of funds and how to ensure value-for-money and results in accordance with objectives and design.

Section 4 below presents in more detail the IAB’s views on some of the challenges faced both by INT and the Bank more broadly in working in a country where the needs and challenges are immense.

3. DEVELOPMENTS SUBSEQUENT TO THE 2011 ANNUAL REPORT

The 2011 Annual Report was submitted to President Zoellick on December 22, 2011 and disclosed as stipulated in the IAB’s Terms of Reference. President Zoellick responded positively in January 2012 to the IAB recommendations to improve the effectiveness of INT and the Bank’s Governance and Anti-Corruption agenda. He reaffirmed the role of INT as an integral part of the World Bank’s GAC efforts.

The IAB briefed the incoming President Jim Yong Kim by a letter dated July 9, 2012 affirming its commitment to continue to work closely with him on this important agenda. In particular the IAB emphasized: (i) the need for INT to be more strategic in its choice of investigations; (ii) its perspectives on the sanctions review and (iii) its continuing advocacy of “graduated” response to encourage countries to act on referrals. President Kim welcomed the IAB’s recommendations.

4. WORLD BANK ENGAGEMENT IN INDIA

The IAB visit to India in December 2012 took place five years after the controversy surrounding the 2008 Detailed Implementation Report (DIR) on fraud and corruption in the health sector. Members were impressed that Bank health projects are now—after many delays—operating again and having impact with good cooperation from officials at the State and District level. The visit to Bihar offered the opportunity to observe conditions and programs underway in several villages in the Vaishali District whose 3.5 million inhabitants are among the most affected in the nation by vector-borne diseases.
Nonetheless, the IAB members were struck by the scope of the INT case portfolio in India. In their meetings with central government officials as well as district and state level officials, representatives of civil society organizations, business leaders and donor agencies, the IAB was impressed by the frequent and open acknowledgement and assertions concerning the prevalence of corruption in the country. The problem affects various fields of activity including public procurement which accounts for up to 25% of GDP. While the problem is not new, attitudes and responses to it appear to be developing rapidly, especially in the public arena. Also striking is the range of official Indian institutions (see below) that have a role in receiving and investigating complaints of corruption and in prosecuting those found responsible. A major factor that arose in almost every conversation with the IAB is the increasingly assertive and critical climate of public opinion and media focus on these issues.

In this highly charged environment, the operations of INT are of special sensitivity. This is partly due to the complexity of governance in India’s democratic and federal system in which Bank officials operate. The Board heard estimates that there may be as many as 8,000 implementing agencies involved in donor-funded programs and projects.

Another factor that heightens INT’s challenge is the number of official entities that have some role in dealing with corrupt behavior at both federal and state levels, and their seemingly different attitudes and policies concerning the operations of INT. Some official bodies have a clearer and better informed understanding than others of the Bank’s own fiduciary obligations to safeguard assets that may be at risk in Bank-financed projects. While fully respecting Indian jurisdiction, Bank officials must be able to do their job in this regard, and they need the cooperation of Indian authorities as they do so. This set of circumstances creates serious operational challenges for both the Country Office and for INT.

A final aspect of the climate facing INT is the concern of central agency officials to ensure that their jurisdiction over the conduct of potential criminal investigations is respected and to restrict INT activities that they perceive might infringe on it. The parallel needs and roles of INT and host officials require best efforts on both sides to restore an acceptable level of mutual understanding and continuous efforts to improve communication.

Despite these serious issues, the IAB mission learned much that is useful in providing a sense of the context in which they could be resolved. At the Central Vigilance Commission (CVC), for example, the IAB was informed of the scope of its activity in receiving some 20,000 complaints each year and its role and relationship with the Corruption Bureau of India (CBI) in pursuing appropriate remedies. While the CVC mission relates to central government procurement operations only, it is a leader in
encouraging best practices including “e-governance” as a means of reducing the ‘human interface’ in such transactions. World Bank-related procurement is not treated separately in a silo distinct from other procurement, but is treated like other funding flows in the view of the CVC.

The IAB received briefings on the ways in which donors’ focus is evolving and ‘traditional’ development projects are being phased out. In the context of the overall economy the Bank’s financing programs are small (‘miniscule’ was a term used by one senior central government official). But the Bank has a role to play, along with other partners, in being a ‘catalyst’, a source of relevant technical expertise and a partner at the state and local levels. In sum, as India’s growth and global role evolves, the Bank will need to be sensitive to calibrate its role in accordance with the country’s needs and priorities and its partially decentralized governance systems. Preventing fraud and corruption in Bank-financed activities must remain a core responsibility of Bank officials, one that works best when the respective roles of Indian agencies and officials and those of the Bank are communicated as clearly as possible.

5. INT IN 2012

   a. INT’s overall performance

   INT’s performance during calendar year 2012 is reflected in a range of specific benchmarks. Most of these are captured in INT’s quarterly reports to the Audit Committee, and are not repeated here. It is especially noteworthy that significant progress is being made in clearing the backlog of past cases. According to data submitted to the Audit Committee, at the end of 2012 some eight investigation cases remained open longer than eighteen months, down from 11 at the end of June and 35 at the end of June 2011. Approximately half of today’s cases get resolved within 12 months.

   This is one of several important measures of performance. Another significant measure of performance concerns the debarment and cross-debarment of sanctioned entities. Some 199 cross-debarments have been registered to date bringing expanded recognition to the concerted effort being made by development banks to identify and sanction those found to be responsible for fraud and corruption.

   The IAB believes that statistical metrics of sanctions proceedings, negotiated resolutions, referrals and other actions are only one factor in assessing the World Bank Group’s performance in combating corruption. For example, the absolute number of referrals carried out in the most recent reporting periods is on a par with the number recorded in the past two years (FY 2011 and FY 2012). More important is to know what happens as a result of referrals: what actions are taken by responsible authorities with legal jurisdiction and what level of public awareness is fostered by taking a clear-cut case
to the relevant national authorities (see section 6 b below). Moreover, the IAB also notes that despite the evident need, the INT and other units within the sanctions system have yet to develop a standardized set of statistics for reviewing and reporting their caseload, a problem that weakens performance measurement and reflects some continuing strains in the working relationships between them.

The IAB attaches particular importance to assuring that INT devotes primary attention to making advances of strategic importance. Major sanctions cases and negotiated resolutions are one measure of such impact. INT’s outreach to sister institutions and partners in ICHA is another device for building the network of committed agencies favoring greater transparency. The IAB applauds INT’s purposeful networking with like-minded agencies such as the Financial Action Task Force and the OECD Working Group on Bribery in International Business Transactions. Publication of sanctions-related information can deepen awareness of the Bank’s activities in combating corruption related to its operations. The January 30, 2013 speech in Washington on Bank anti-corruption efforts by President Jim Yong Kim highlighted INT’s efforts, putting them front and center in his agenda. The IAB takes note of efforts to develop best practices in the Bank’s new compliance monitoring system (ICO), another method of strengthening the institution’s credibility and visibility in this area.

INT officials cite sectors such as roads, power, and education as fields where its work is likely to effect change even in the most challenging operating environments as people come to recognize that fraud or corruption will not go unnoticed. However, allegations of misconduct continue to be concentrated in particular sectors and regions, a pattern that requires Bank leadership to keep these vulnerabilities under particular scrutiny. That will be especially important as the Bank further defines INT’s role in assuring that its program-for-results (PforR) operations do not expose the institution to needless risk. The IAB is aware that the world’s premier development lending agency must be capable of identifying, managing and mitigating risk in its operations. At the same time, as President stated recently, “When corruption is discovered in our projects and activities, we have zero tolerance for it within the World Bank Group.”

There was improvement in 2012 in INT’s communication and interaction with the IAB enabling the latter to offer feedback and suggestions from time to time during the year. Having said this, the IAB continues to believe (as noted in last year’s report) that INT spreads itself thinly across a wide array of jurisdictions, sectors, complaints, and cases. Hence, there is a continuing need to think strategically, to select issues and targets for particular focus while building on recent achievements in broadening its base and standing both within and outside the Bank.
b. **Significant cases concluded in 2012**

The World Bank Sanctions System was able to conclude several high profile cases in 2012.

1. **The Alstom Settlement**

   Of particular importance is INT’s settlement with Alstom and its subsidiaries, concluded in February 2012. It sends a strong signal that the World Bank is serious in combating fraud and corruption and that even large corporations are not beyond the reach of justice.

   The press release of the Bank of 22 February 2012, described events in which Alstom, in 2002, made an improper payment of Euros 110,000 to an entity controlled by a former senior government official for consultancy services in relation to the World Bank-financed Zambia Power Rehabilitation Project. In the settlement Alstom accepted a three-year debarment for its subsidiaries Alstom Hydro France, Alstom Network Schweiz AG and their affiliates. The agreement also contained a conditional non-debarment of Alstom SA itself and all its remaining subsidiaries and required Alstom SA to pay restitution of US$ 9,542,230 for its admitted misconduct on two contracts, which is equivalent to 40% of the total value of these contracts. Alstom made its first payment in March 2012. Furthermore INT requested the other multilateral development banks to cross-debar the Alstom entities debarred by the World Bank Group. Finally, INT prepared a referral report to the Zambian authorities. The Bank is also considering whether it has jurisdiction to pursue intermediary entities used to funnel payments to the government official in question.

2. **The Padma Multipurpose Bridge Project in Bangladesh**

   In February 2012 the World Bank announced that it had credible evidence of executives of the Canadian engineering company SNC Lavalin and private individuals conspiring to bribe high ranking Bangladeshi government officials and intermediaries. Upon awarding of the construction supervision consultancy a percentage of the value of the contract would have been paid to certain persons. Initially the Bank decided to stop financing the project. After assurances were given by the Bangladeshi government to place all public officials suspected of involvement of corruption under investigation and to allow INT to appoint a special inquiry team within the Bangladesh Anti-Corruption Commission (ACC) and to provide full and adequate access to all investigative information to the panel appointed by the World Bank, comprised of internationally recognized experts, the Bank reconsidered its decision not to finance the bridge project. It resorted to a rarely used alternative, turnkey-style implementation approach to the project, since the importance of the bridge for the development of the entire region was widely recognized.
Since then, the Government of Bangladesh informed the World Bank that it is withdrawing its request for World Bank financing of the Bridge. The letter to the Bank, however, confirms the Authority’s intent to continue the investigation.

c. **Ongoing investigations**

INT is currently pursuing several high profile investigations. As the IAB focused on field work in India this year, we report more specifically on a major project, the Lucknow Muzaffarpur National Highways Project.

In 2005 the World Bank entered into a loan agreement with the Government of India and a project agreement to help fund a highway improvement project from Lucknow in Uttar Pradesh to Muzaffarpur in Bihar. The project aims to upgrade 483 km of an existing road from two lanes to a four-lane divided highway. The IBRD loan amount was initially US$ 620 million, with co-financing of US$ 186 million by the Government of India.

In 2009 the Supervision Consultants reported that the level of completion varied from 20 percent to 74 percent per contract. Overall the project ratings have ranged from unsatisfactory, moderately unsatisfactory, to moderately satisfactory. In October 2008 the World Bank Group President alerted INT to potential implementation failures under this project when it was reported that an overpass had collapsed. INT spent nearly 3 months in the field conducting inspection and forensic audit activities, it focused on the review of procurement, implementation, management and supervision arrangements.

INT identified compelling evidence of fraud, corruption and malfeasance on the part of companies it reviewed. INT has obtained evidence of fabricated invoices, misrepresented expenditures and corrupt payments to supervision consultants and project officials in excess of US$ 13 Million. Overall there is evidence of corrupt practices as well as of fraud. The findings were shared with the India Department of Economic Affairs, in order to allow the Government of India to run its own investigation. The Indian probe is currently conducted by the CBI.

6. **KEY ISSUES**

In 2012 the Board has paid particular attention to the ongoing sanctions review, referrals and e-government as a way to improve transparency, accountability and participation.

a. **Sanctions Review**

The Bank first implemented its sanctions process in 1998. Since then it has undergone substantial amplification and refinement. In 2001 the INT was established and given the role of investigating allegations of fraud and corruption and presenting its
findings to a sanctions committee. In 2004 the two tiered structure was introduced with the Evaluation and Suspension Officer (OES) reviewing cases in the first instance with the right for a respondent to refer matters to a Sanctions Board for review. In 2006 new Anti-Corruption guidelines were adopted. In 2009 a new procedure for temporary suspension was introduced. In 2010 debarment with conditional release was recognized as the baseline sanction with an Integrity Compliance Officer (ICO) established to implement an integrity compliance program which a debarred party has to meet before being released from debarment. Other developments at this time included a formal mechanism for negotiated settlements and the enforcement of debarment decisions by other multilateral development banks. In 2011 the Sanctions Board began publication of a law digest which included case summaries.

The development of the sanctions regime over this period has led to a much more extensive system where the rights and ability of parties accused of sanctionable conduct to contest proceedings have been amplified. The transparency of the system is much greater and, as a result, the accountability of decision-makers has been increased. As the rights of parties to contest proceedings have increased and as lawyers have represented parties to proceedings they have become more legalistic in nature.

The legal basis for the sanctions regime lies in the Articles of Agreement of the World Bank and in particular the fiduciary duty of the Bank to ensure that funds are used for intended purposes and that the Institution accounts to its shareholders in that regard. The sanctions proceedings were established as an administrative process. The developments since then have given it a more quasi-judicial appearance. This has partly been driven by a desire to ensure fairness, and, perhaps, also by external developments where the Bank has had to respond to developments under international and supra national conventions on human rights.

Whilst the IAB has welcomed increased independence and transparency in the sanctions process, the Board has also been concerned that the process is becoming much more complex and, as a result, time consuming. In its letter to the incoming President of the Bank in July 2012, the IAB raised its concern that “the Bank might run the risk of setting up an expensive and time consuming legal system which will tie up great resources without commensurate benefit to the operation and the mission of the Bank”. The IAB still believes this is a present risk. As the Bank continues to refine the operation of its sanctions regime it must bear this risk in mind.

It is not possible for the Bank to run a judicial system. It does not have the legal basis to do so, nor the sovereign power to enforce it. Its investigative arm, INT, has no coercive power to gather evidence in a way which would be required for a fully judicial system. The World Bank is not a law enforcement agency, it is not a judicial body, nor is it a sovereign state. It is a lending and development institution. It has a duty to make
sure that its funds are used for legitimate development and to prevent corruption from undermining that purpose. It has a responsibility to its shareholders to ensure that their money is properly used for the purposes for which it has been provided. It has a legitimate interest in preserving its reputation and adhering to the highest standards in its lending and development work.

During the course of the year the Board was approached by a Party to a proceeding seeking its (the Board’s) intervention on a particular matter. Our terms of reference do not run to intervening in relation to specific cases. We are directed to focus on systemic issues. As a result the IAB has not responded to that request. Specific cases should be determined by the OES and the Sanctions Board in accordance with current procedures. The IAB is satisfied that the current procedures will be able to resolve the issues in contest although they do highlight the fact that under the current system highly contested and litigious cases do stretch the capacity of the current arrangements and may lead to proceedings that consume a great deal of time and resources.

The sanctions system, which began purely as an administrative process, is now more hybrid. It could be streamlined. The Board recommends that the Bank carefully consider this issue and give weight to the need for a fair but efficient system – one capable of coming to sensible decisions expeditiously. The IAB will continue to monitor this issue and would be pleased to assist the Bank in considering any reform proposals.

It should be borne in mind that through December 31, 2012, 61% of cases have not been contested. These cases which can be resolved administratively should be disposed of with minimum delay. To the extent that procedural requirements, which have been put in place to deal with contested cases, are imported into and slow the conduct of uncontested cases this will lead to unnecessary cost and distraction for the Bank and its officers.

One issue that has been raised in a number of the IAB’s previous reports is the procedure for Early Temporary Suspension (ETS). Staff at the Bank are in a difficult position when they know a party is under investigation, but no proceeding has been issued. That party is under no ban on bidding for a new contract. If it is successful however it is still possible it could be debarred shortly thereafter for prior misconduct on other contracts. This raises a reputational risk to the Bank.

If INT believes there is sufficient evidence to support a finding of a Sanctionable Practice it can request a Temporary Suspension before it has concluded its investigation. The standard of proof “sufficient evidence” is the same standard as is required to present a concluded Statement of Accusation and Evidence (SAE). However the OES is required to have regard to a range of matters that may raise an even higher standard than is required for a concluded investigation.
Normally a temporary or interim penalty would not require a standard of proof higher than is required for a final penalty. There are precedents for lesser requirements to apply to interim steps in an investigative process – such as probable cause – that could be used here genuinely to allow temporary steps to be taken to protect the reputation of the Bank and resolve the uncertainty about the status of a bidder pending a final concluded investigation. The IAB recommends a careful consideration of this as a mechanism to improve the workability of early temporary suspension.

b. **Referrals**

As noted above the Bank does not have the powers of a sovereign nation and does not have the ability to prosecute a breach of national law. This does not mean that it is disinterested in the enforcement of measures against fraud and corruption. On the contrary, the Bank as a reputable institution is keen to cooperate with national law enforcement authorities where it is able to provide evidence of wrongdoing. As an international development agency, it has an interest in eliminating fraud and corruption which will otherwise compromise its mission and its ultimate objective as a development agency. The Bank has therefore developed a system of referring cases where fraud and corruption has occurred on Bank-financed projects to national authorities for follow up investigation and, if appropriate, prosecution. Again, as noted above, the Bank does not have coercive investigative powers so sometimes the material it refers may only be used by national authorities for further investigation rather than evidence in an admissible form. The material is nonetheless valuable to anti-corruption efforts.

In its lending activity the Bank generally interacts with Finance and Treasury Departments who negotiate loans and receive the disbursement of funds. In making a referral however it is necessary to bring the attention of potential fraud and corruption conduct to relevant law enforcement authorities. In many countries these will include national anti-corruption agencies or dedicated prosecution bureaux.

The Bank needs to be able to refer to and assist these relevant agencies. Some countries prefer one dedicated liaison agency to deal with the Bank in relation to lending and grant operations. This has obvious benefits from the point of view of coordination and technical expertise but on the conclusion of an investigation where relevant information has come to light that warrants referral, it is important that material also be referred to the premier agency with responsibility to act against fraud and corruption. The IAB recommends that the liaison agency be kept fully informed of the referral but that INT continue the practice of referring directly to national anti-corruption agencies.

c. **E-Government as a tool to fight corruption**

The World Bank is a strong proponent of the use of “e-government” as a tool in fighting corruption. It defines this as “the use by government agencies of information
technologies (such as Wide-Area Networks, the Internet, and mobile computing) that have the ability to transform relations with citizens, businesses, and other arms of government.” The Bank believes that the use of modern information technologies can result in less corruption, increased transparency, greater convenience, revenue growth, and cost reductions.

E-Government increases transparency and can be used for government systems, procedures, services and taxes/fees. And in this connection, “[t]here is strong empirical evidence correlating transparency with less corruption.” Also, “[c]orruption is most widespread in countries lacking transparency with processes, operations and laws (La Palombara, 1994; Tanzi, 1998).” Further, “[c]ountries that have invested more in e-government have also seen larger reductions in levels of corruption”.

Both developed and developing countries have been using E-Government as a tool to fight corruption. India is one of them. Among its e-government projects is the BHoomi project, the electronic land record project in Karnataka, India that has computerized almost 20 million records of land ownership of 6.7 million farmers. As a result, a printed copy of the record of rights, tenancy and crops (RTC) can be obtained online. Before the project, securing a copy of the RTC could take up to 30 days. Such delay provides the opportunity for corrupt officials in charge of custody and giving copies of the land records to extort bribes from farmers to expedite the release of the requested documents.

Anti-Corruption Agencies can also use E-Government to publicize their work and solicit assistance for their activities through electronic means. For example India’s CVC uses its website to describe important information such as:

a) the duties, objectives and programs of CVC;

b) the procedure on how to file a complaint against public officials with CVC; and

c) the list of public officials who have been charged or convicted of corruption – related offenses.

E-Government that promotes information and transparency and which empowers people who know of corruption to do something about it, is an important tool in the fight to end corrupt practices.

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7. ANTI-CORRUPTION – HOW IT FITS IN THE BANK GOING FORWARD

a. Governance and Anti-Corruption (GAC)

In March 2012, the Board of the World Bank approved the Updated Strategy and Implementation Plan. The updated strategy rests on six pillars: (i) scaling up and systematizing successes; (ii) supporting country institutions; (iii) focusing on results; (iv) managing risks; (v) improving global governance; and (vi) organizing for delivery. The approved document states that “despite significant progress made over the last few years, it is clear that the Bank needs to do even better in understanding issues of governance, institutions for development effectiveness, and ways to tackle corruption and malfeasance.”3 It is in that context that the IAB has worked to promote higher engagement between INT and Operations to foster greater effectiveness in addressing governance and anti-corruption challenges.

b. INT’s role in GAC

The Board has always sought to support INT in its role within the Bank and to represent legitimate concerns of the wider Bank staff back to INT. The IAB has promoted the integration of INT’s role within the evolution of the governance and anti-corruption policy.

The INT has been able to assist GAC on a wider basis by developing its preventative work in its Preventative Services Unit. It has been able to assist early detection and avoidance of harmful practice as was the case in the Padma Bridge Project. By co-operating with other sections of the Bank the INT has increased its effectiveness not diminished it and the IAB recommends this continue.

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Annex 1

List of Meetings

- Robert Zoellick, President
- Sri Mulyani Indrawati, Managing Director, MDI
- Mamta Murthi, Adviser, MDI

Audit Committee

- Ian H. Solomon, Acting Chairman, Executive Director (ED), United States
- Domingos Pedro, Acting Alternate (for Renosi Mokate, Chair of Audit Committee, ED, Angola, Nigeria, South Africa)
- Gian Paolo Ruggiero, Acting Alternate, (for Piero Cipollone, Vice Chair of Audit Committee, ED, Albania, Greece, Italy, Malta, Portugal, San Marino, Timor-Leste)
- In-Kang Cho, Alternate, (for John Whitehead, ED, Australia, Cambodia, Kiribati, Republic of Korea, Marshall Islands, Federated States of Micronesia, Mongolia, New Zealand, Palau, Papua New Guinea, Samoa, Solomon Islands, Tuvalu, Vanuatu)
- Mukesh Prasad, member, ED, Bangladesh, Bhutan, India, Sri Lanka
- Gunawan Pribadi, Acting Alternate (for Hekinus Manao, ED, Brunei Darussalam, Fiji, Indonesia, Lao People's Democratic Republic, Malaysia, Myanmar, Nepal, Singapore, Thailand, Tonga, Vietnam)
- Rogerio Studart, member, ED, Brazil, Colombia, Dominican Republic, Ecuador, Haiti, Panama, Philippines, Suriname, Trinidad and Tobago
- Anne Touret, Alternate (for Ambroise Fayolle, ED, France)

Institutional Integrity (INT)

- Leonard McCarthy, Vice President, INTVP
- Galina J. Mikhlin-Oliver, Director, Strategy and Core Services, INTSC
- Stephen Zimmermann, Director, Operations, INTOP
- Leonard Orens Newmark, Senior Investigator, INTOP

Legal (LEG)

- Anne-Marie Leroy, Senior Vice President and General Counsel, LEGVP
- Frank Fariello, Lead Counsel, Operations Policy, LEGOP

Operations Policy and Country Services (OPCS)

- Joachim von Amsberg, Vice President, OPSVP
- Paul Bermingham, Director, Operational Risk Management, OPSOR
Regions (RVP)

- Colin Bruce, Director, Strategy and Operations, Africa Region, AFRVP
- Pamela Cox, Vice President, East Asia and Pacific, EAPVP
- Philippe H. Le Houerou, Vice President, Europe and Central Asia, ECAVP
- Hasan A. Tuluy, Regional Vice President, Latin America and Caribbean, LCRVP
- Laura Tuck, Director, Strategy and Operations, Middle East and North Africa, MNAOS
- Isabel M. Guerrero, Vice President, South Asia, SARVP

Poverty Reduction and Economic Management (PRM)

- Otaviano Canuto, Vice President, PRMVP
- Graham Teskey, Senior Adviser, Public Sector Governance, PRMPS

Office of Evaluation and Suspension (OES)

- Pascale Helene Dubois, Evaluation and Suspension Officer
- Paul Ezzeddin, Senior Policy Officer
- Jamieson Smith, Senior Counsel

Sanctions Board (SBS)

- L. Yves Fortier, Chair, the World Bank Group Sanctions Board
- Elizabeth Lin Forder, Senior Counsel and Secretary to the Sanctions Board

INDIA (December 5-9, 2012)

World Bank Staff

- Onno Ruhl, Country Director for India, SACIN
- Jill Armstrong, Country Program Coordinator, Indian Anchor, SACIA
- Christopher Juan Costain, Principal Regional Team Leader, Water & Sanitation Program, TWISA
- Michael Haney, Operations Advisor, SACIN
- Roland Lomme, Governance Advisor, SACIN
- Abduljabbar Hasan Al Qathab, Lead Procurement Specialist, SARPS
- Shanker Lal, Senior Procurement Specialist, SARPS
- Manoj Jain, Lead Financial Management Specialist, SARFM
- Leslie Kojima, Senior Financial Specialist, SARFM
- Ashish Khanna, Lead Energy Specialist, SASDE
- Ramesh Govindaraj, Lead Health SpecialistSASHN
- Preeti Kudesia, Senior Public Health Specialist, SASHN
• William Starbuck, Senior Operations Officer, SASHN
• Arnab Bandyopadhyay, Senior Transport Engineer, SASDT
• Pratap Tvgssshrk, Senior Transport Specialist, SASDT
• Vikram Menon, Senior Public Sector Specialist SASGP

Government Officials

• Mr. Shaktikanta Das, Additional Secretary, Department of Economic Affairs, (DEA), Ministry of Finance (MoF)
• Mr. Prabodh Saxena, Joint Secretary, DEA, MoF
• Mr. Nilaya Mitash, Director, DEA, MoF
• Mr. C. Kandasamy, Director General, Road Development and Special Secretary, Ministry of Road Transport and highways, MoRTH
• Mr. A.K. Awasthi, Deputy Comptroller and Auditor General, CAG
• Mr. Pradeep Kumar, Central Vigilance Commissioner, Central Vigilance Commission, CVC
• Mr. Shri R. Sri Kumar, Vigilance Commissioner, CVC
• Mr. K. Subramaniam, Officer on Special Duty, CVC
• Mr. A.K. Sinha, Chief Secretary, Government of Bihar, Patna

Development Partners

• Ms. Cristina Albertin, Representative for South Asia, United Nations Office on Drugs and Crime, UNODC
• Ms. Sumita Banerjee, Head of Democratic Governance, United Nations Development Programme, UNDP
• Ms. Renu Deshpande, Governance Adviser, Department for International Development, UK-DFID
• Ms. Emma Spicer, Deputy Head, and head of MDG Programme Team, DFID
• Mr. Bernd Dunzlaff, Head, Economic and Development, Embassy of Germany
• Ms. Madumita Gupta, Director - Office of Special Activities, Governance and Education, United States Agency for International Development, USAID
• Mr. Hun Kim, Head, Asian Development Bank, ASDB
• Mr. Oskar von Maltzan, Director, KfW
• Mr. Gopi Menon, Country Manager (India and South Asia Programs), Australian Agency for International Development, AusAID
• Mr. Arno Schafer, Operations Head, Delegation of the European Union to India
• Mr. Hiroshi Suzuki, Senior Representative, Japan International Cooperation Agency, JICA

Representatives of Think Tanks and Civil Society Organizations (CSOs)

• Mr. Shailesh Gandhi, former Central Information Commissioner
• Prof. Shekhar Singh, Coordinator, National Campaign for Right to Information
• Mr. P.S. Bawa, Chairman, Transparency International India
• Mr. P. Sinha, former Central Vigilance Commissioner
• Mr. Anupam Kulshreshtha, former Deputy Comptroller and Auditor General
• Mr. Rajiv Tikoo, Director and Editor Chief, One World Foundation, South Asia
• Ms. Yamini Aiyar, Director of Accountability Initiative, Centre for Policy Research
• Mr. Mohan Gopal, Chairman of the Rajiv Gandhi Institute of Contemporary Studies, former Bank staff (Chief Counsel)
• Mr. Fali S. Nariman, Advocate, Supreme Court

Private Sectors Representatives
• Mr. Salil Singhal, Past Chairman Confederation of Indian Industry (CII), and Chairman & Managing Director, PI Industries
• Mr. S.Y. Siddiqui, Chief Operating Officer - Administration - HR, Finance, IT & COSL, Maruti Suzuki India Ltd.
• Mr. Deepak Gupta, Executive Director, PricewaterhouseCoopers
• Ms. Anupama Arya, Managing Director, Hatch Fund and President Y!
• Mr. Shailesh Pathak, President, Srei Infrastructure Finance Ltd
• Mr. Nalin Kohli, Group Chairman & CEO, Araina Enterprises
• Mr. Bharat Wakhlu, Resident Director, TATA Services Limited
• Mr. Ajit Jha, Director, Corporate Affairs, SAB Miller India
• Mr. Rohit Mahajan, Partner, Head, KPMG
• Mr. Gagan Palta, Country Compliance Officer, Alstom India
• Mr. S. Sen, Principal Adviser, CII
Independent Advisory Board Meetings
Washington, DC
June 4 -7, 2012

Agenda

**Monday June 4**

<table>
<thead>
<tr>
<th>Time</th>
<th>Meeting</th>
<th>Venue</th>
</tr>
</thead>
<tbody>
<tr>
<td>0930-1000</td>
<td>Leonard McCarthy, Vice President, INT</td>
<td>MC11-500</td>
</tr>
<tr>
<td>1000-1030</td>
<td>Coffee</td>
<td></td>
</tr>
<tr>
<td>1030-1115</td>
<td>Internal meeting and administrative issues</td>
<td>MC11-500</td>
</tr>
<tr>
<td>1115-1215</td>
<td>Leonard McCarthy, Steve Zimmermann and Galina Mikhlin-Oliver, INT</td>
<td>MC11-500</td>
</tr>
<tr>
<td>1230-1400</td>
<td>Lunch with INT staff Host: Leonard McCarthy, VP, INT</td>
<td>INT office</td>
</tr>
<tr>
<td>1400-1500</td>
<td>Internal discussions and preparation for visit to India</td>
<td>MC11-500</td>
</tr>
<tr>
<td>1500-1630</td>
<td>Regional Vice Presidents Chair: Joachim von Amsberg, VP, OPCS</td>
<td>MC11-500</td>
</tr>
<tr>
<td>1630-1800</td>
<td>Internal Discussions</td>
<td>MC11-500</td>
</tr>
<tr>
<td>1900</td>
<td>Dinner Host: Sri Mulyani, Managing Director</td>
<td>Taberna del Alabardero</td>
</tr>
</tbody>
</table>

**Tuesday June 5**

<table>
<thead>
<tr>
<th>Time</th>
<th>Meeting</th>
<th>Venue</th>
</tr>
</thead>
<tbody>
<tr>
<td>0930-1145</td>
<td>ICHA conference – Opening Remarks</td>
<td>IMF Auditorium</td>
</tr>
<tr>
<td>1150-1230</td>
<td>Preparation for ICHA IAB session</td>
<td>MC11-500</td>
</tr>
<tr>
<td>1230-1400</td>
<td>Lunch ICHA</td>
<td>WB</td>
</tr>
<tr>
<td>1400-1545</td>
<td>ICHA – IAB on panel of experts</td>
<td>JB1-80</td>
</tr>
<tr>
<td>1730-1800</td>
<td>President Robert Zoellick</td>
<td>MC12-750</td>
</tr>
<tr>
<td>1900</td>
<td>Open</td>
<td></td>
</tr>
</tbody>
</table>
### Wednesday, June 6

<table>
<thead>
<tr>
<th>Time</th>
<th>Meeting</th>
<th>Venue</th>
</tr>
</thead>
<tbody>
<tr>
<td>0915-1015</td>
<td>Anne-Marie Leroy, General Counsel, LEGVP on Sanctions Review</td>
<td>MC6-313</td>
</tr>
<tr>
<td>1015-1045</td>
<td>Coffee</td>
<td></td>
</tr>
<tr>
<td>1045-1230</td>
<td>Internal discussions and preparation for India</td>
<td>MC11-500</td>
</tr>
<tr>
<td>1230-1400</td>
<td>Lunch with the Audit Committee</td>
<td>MC Dining Room F</td>
</tr>
<tr>
<td>1400-1530</td>
<td>GAC Steering Group (PREM, OPCS, INT)</td>
<td>MC11-500</td>
</tr>
<tr>
<td></td>
<td>Graham Teskey, PRMPS (chair), Paul Bermingham, OPCS, Galina Mikhlín-Oliver, INT</td>
<td></td>
</tr>
<tr>
<td>1600-1700</td>
<td>Yves Fortier, Chair of the Sanctions Board and Elizabeth Forder, Secretary, Sanctions Board</td>
<td>MC11-500</td>
</tr>
<tr>
<td>1715-1815</td>
<td>Debriefing with Sri Mulyani, Managing Director</td>
<td>MC12-765</td>
</tr>
<tr>
<td>2000</td>
<td>Dinner</td>
<td>Bourbon Room</td>
</tr>
<tr>
<td></td>
<td>Host: Leonard McCarthy, Vice President, INT</td>
<td>2800 Pennsylvania Ave</td>
</tr>
</tbody>
</table>

### Thursday, June 7

<table>
<thead>
<tr>
<th>Time</th>
<th>Meeting</th>
<th>Venue</th>
</tr>
</thead>
<tbody>
<tr>
<td>1030-1115</td>
<td>Meeting with Pascale Dubois, OES</td>
<td>MC11-500</td>
</tr>
<tr>
<td>1115-1130</td>
<td>Coffee</td>
<td></td>
</tr>
<tr>
<td>1130-1230</td>
<td>Preparation for December visit to India and debriefing with VP INT</td>
<td>MC11-500</td>
</tr>
<tr>
<td>1245-1400</td>
<td>Lunch</td>
<td>Kinkead's</td>
</tr>
<tr>
<td></td>
<td>Host: Paul Bermingham for Joachim von Amsberg, OPCS. Ms. Anne-Marie Leroy, LEG, Leonard McCarthy, INT</td>
<td></td>
</tr>
</tbody>
</table>
Independent Advisory Board Meetings  
India  
December 5 - 8, 2012  

Agenda  

**Wednesday, December 5 – Delhi**  

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.30 am</td>
<td>Pick up by office van</td>
</tr>
</tbody>
</table>
| 9:00 – 11:30 pm | Meeting with World Bank Country Team  
(Venue: World Bank, New Delhi Office)                 |
| 11.30 – 11.45 am | Transfer to South Block                                                                            |
| 12.00-12.45 pm | Meeting with Mr. Pulok Chatterji, Principal Secretary in the Prime  
Minister’s Office  
(Venue: Gate No. 5, South Block)                       |
| 12.45 – 1.00 pm | Transfer to Confederation of Indian Industry (CII)                                                  |
| 1.00 – 2.30 pm | Meeting and Lunch at CII with representatives of the private sector  
(Venue: CII House, 23, Institutional Area, Lodi Road) |
| 2.30 – 3.00 pm | Transfer to North Block                                                                             |
| 3.00 – 5.00 pm | Meeting with Mr. Shaktikanta Das, Additional Secretary (EA), Department of Economic Affairs (DEA), Ministry of Finance  
(Venue: Ministry of Finance, North Block) |
| 7.45 pm       | Transfer to India International Centre (IIC) main Building                                         |
| 8:00 pm       | Dinner with Representatives of Think Tanks and Civil Society Organizations  
(Venue: Private Dining Hall, Ist Floor, IIC Main Building) |

**Thursday, December 6 – Delhi/Patna**  

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
</table>
| 8:30 – 10:00 am | Working Breakfast with Donors  
(Venue: Parliament, ‘The Chambers, Taj Mansingh Hotel) |
| 11.30 am      | Transfer to CAG Headquarters                                                                       |
| 12.00 – 1.00 pm | Meeting with Mr. A.K. Awasthi, Deputy, Comptroller and Auditor General  
(CAG)  
(Venue: Deen Dayal Upadhyay Marg, Near ITO)          |
| 1.30 – 2.30 pm | Lunch at Hotel Taj Mansingh (Internal IAB & INT)  
(Venue: Machan coffee shop)                          |
<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.00 pm</td>
<td>Depart for Central Vigilance Commission (CVC) Headquarters</td>
</tr>
</tbody>
</table>
| 3.15-4.15 pm | Meeting with Mr. Pradeep Kumar, Central Vigilance commissioner  
Venue: Satarkata Bhawan, GPO Complex, INA                                                          |
| 4.30 pm    | Transfer to Domestic Airport                                                                        |
| 6.35 – 8.05 pm | Flight to Patna by AI 415                                                                             |
| 8.15 pm    | Transfer to Hotel Maurya                                                                             |
| 8.45 pm    | Dinner at Hotel Maurya Patna  
Venue: Dinning Hall, Hotel Maurya Patna                                                               |

**Friday, December 7 – Patna/Delhi**

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.30 am</td>
<td>Leave Hotel for Field trip</td>
</tr>
<tr>
<td>8:30 – 3:30 pm</td>
<td>Field trip to the Vector Borne Disease Project</td>
</tr>
<tr>
<td>4.30 – 4.45 pm</td>
<td>Transfer to CM’s residence</td>
</tr>
<tr>
<td>5.00 – 6.00 pm</td>
<td>Meeting with Mr. A. K. Sinha, Chief Secretary, Government of Bihar</td>
</tr>
<tr>
<td>6.15 – 7.00 pm</td>
<td>Light Supper at the Hotel</td>
</tr>
<tr>
<td>7.00-7.30pm</td>
<td>Transfer to Domestic Airport</td>
</tr>
<tr>
<td>8.40 pm – 10.25 pm</td>
<td>Flight to Delhi by AI 416</td>
</tr>
<tr>
<td>10.40pm</td>
<td>Transfer to Hotel Taj Mansingh</td>
</tr>
</tbody>
</table>

**Saturday, December 8 – Delhi**

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
</table>
| 10.00 – 11.00 am | De-briefing meeting (IAB, INT and Country Management Unit (CMU)  
Venue: Parliament, The Chambers, Taj Mansingh Hotel ) |
| 11.00 – 2.30pm | IAB internal meeting  
Venue: Parliament, The Chambers, Taj Mansingh Hotel ) |