



**Regional Consultation Meeting
on the Review of the World Bank Group Sanctions System
Consultation Feedback Summary**

Date: November 8, 2013, 10:00 a.m. – 11:00 a.m. (+0100 UTC)

Venue: World Bank, Berlin office, Germany (video-connection with Washington, D.C.)

Total number of Participants: 3

FEEDBACK FROM STAKEHOLDERS

General Comments

- Participants stressed the importance of looking at the demand side of corruption (the briber-taker), not only the supply side (the bribe-giver): ‘it takes two to tango’. Participants argued that government officials should not be immune from the sanctions system. In particular, participants mentioned that the Bank should do more to address one of the biggest challenges faced by the private sector: ie. those situations where public officials extort bribes for the timely performance of their duties.
- One participant mentioned that reporting these cases to the Bank (including name of the public official seeking payment of a bribe) would protect the company
- Participants invited the Bank to include clearer and stronger language in its General Conditions aimed at tackling the demand side of corruption
- Participants asked the Bank to intensify its efforts in corruption prevention (e.g. by making wider use of integrity pacts)
- Participants called for close coordination between the sanctions review and the procurement review. One participant also recommended that INT’s role be maintained strong notwithstanding the increased emphasis on country systems

Due Process

- Participants emphasized the importance that appropriate safeguards be in place to protect companies from malicious allegations and that respondents be given an opportunity to challenge these allegations when/if they are made

Efficiency of Investigations and Sanctions Proceedings

- Participants called for a reduction of investigative times, where appropriate, and suggested that the Bank should consider imposing deadlines for INT’s investigations

Voluntary Disclosure Program

- Participants perceived the requirements to access the VDP as onerous. As a result, VDP is not considered a viable option by most companies