Independent Advisory Board (IAB)

2010 Annual Report

January 2011
IAB – ANNUAL REPORT (2010)

This is the second annual report of the Independent Advisory Board (IAB) which covers: (1) Meetings since the last report; (2) Response to the IAB’s 2009 Annual Report; (3) Subsequent Developments; (4) INT in the year 2010; and (5) Key Policy Issues.

The IAB takes this opportunity to thank President Zoellick, Ms. Sri Mulyani Indrawati, Ms. Anne-Marie Leroy, Messrs. Juan Jose Daboub, the Audit Committee, Leonard McCarthy, Joachim von Amsberg and other senior management and World Bank Group staff who contributed to the rich discussions that helped the IAB deliberate, and then formulate the recommendations presented in this report.

1. MEETINGS SINCE THE LAST REPORT

The IAB met three times since its last report: (i) Audio-conference with the Audit Committee: April 28, 2010; (ii) Croatia: June 26-July 1, 2010; and (iii) Washington: November 27-29, 2010.

The activities that took place during these meetings are summarized below and include brief statements on the conclusions reached by the Board. Annexes 1 and 2 provide the program of work of these meetings and a list of the people the Board met.

Audit Committee – April 2010

The IAB discussed its 2009 annual report with the Audit Committee (AC) via conference call on April 28, 2010. During the discussions the IAB reported there had been significant improvement in the way INT manages its work load and much better relationships between INT and the Banks’ operational units. The IAB also noted there had been important developments with the Siemens settlement and the cross-debarment agreements with other multilateral development banks (MDBs). The IAB highlighted areas requiring further work such as agreement on the definition of misconduct, getting performance indicators (quantitative and qualitative) into place, and ensuring more analysis by the Prevention Services Unit (PSU) on areas of greater risk. The AC shared its concerns with the IAB regarding the quality control function of INT; how the PSU can maintain its independence while advising the Bank’s operational units; the roles of Poverty Reduction and Economic Management (PREM) and Operations Policies and Country Services (OPCS) in implementing the Governance and Anti-Corruption (GAC) agenda; preparedness for the cross-debarment initiative; and the number of pending INT cases and the need for INT better to prioritize its workload. The AC indicated that it looked forward to more interaction with the IAB.

Croatia – June 2010

The IAB met in Croatia between June 26 and July 1, 2010 and had productive sessions in the cities of Pula and Zagreb. In Pula the Board met county and municipal prosecutors and judges to discuss issues of governance and corruption and the significant challenge of organized crime that
capitalizes on Croatia’s geographic location. The Bank has a substantial engagement with the country focused on helping the judiciary meet the standards required to accede to the EU.

The Board noted that the dynamics and focus of the Bank’s efforts are very different than those they observed in Kenya in July 2009. Although justice processes are marred with constraints and delays, the IAB was informed that corruption cases are a high priority for the judiciary and that public intolerance of corruption is growing. In Zagreb, the IAB met the Prevention of Corruption and Organized Crime Agency (USKOK), H.E. the Prime Minister, H. E. the President and several senior officials of the Government of Croatia. The Board also met a group of non-governmental organizations (NGOs) keen to monitor the financing of politics and the accountability of the public service. Access to information is problematic notwithstanding the 2003 law on the *Right of Access to Information*. Nevertheless the NGOs were positive about the performance of USKOK. The latter is a beneficiary of World Bank support that should lead to better case management and supervision. On its part, USKOK underlined the problem of organized crime and mentioned cases that involve high ranking officials. A good deal of current corrupt practice seems to stem from the history and nature of the privatization process. USKOK added that the improvement of bilateral relations with Serbia will be essential to deal with organized cross-border crime.

Washington DC – November 2010

The IAB met most recently in Washington from November 27-30, 2010, where it continued the dialogue with INT on how best to improve the performance of the Vice Presidency. It also met for the first time Messrs. Joachim von Amsberg, Vice President, OPCS and Paul Bermingham, Director, OPCS, to discuss broader issues related to Bank operations and their impact on INT’s work. The issue of the Bank’s lending and the need to be vigilant about the use of funds, particularly Development Policy Operations (DPOs), constituted a main element of that discussion. The Board met Ms. Anne-Marie Leroy, Vice President, Legal and General Counsel (LEG) to be briefed on sanctions reforms and processes. The IAB also met Ms. Pascale Dubois, Evaluation and Suspension Officer and Mr. Fathi Kemicha, Chair and Ms. Elizabeth Lin Forder, Permanent Secretary of the Sanctions Board. During the session with Ms Sri Mulyani Indrawati, the Board discussed the World Bank’s GAC agenda, and issues related to the mandate/performance of INT. Ms. Indrawati indicated that she would welcome the involvement of the IAB on broader, strategic GAC issues.

This visit focused particularly on the sanctions process, its outcomes and improvements to it.

2. RESPONSE TO THE IAB’S 2009 ANNUAL REPORT

The annual report was submitted on January 5, 2010. The Terms of Reference stipulate that the IAB annual report will be publicly disclosed. This was done in August 2010. The IAB recognizes that, since this was its first Report, a web site and links had to be put in place. In the future, the IAB expects its reports will be published in a more timely manner. The IAB was pleased to receive a response to its findings and recommendations as follows: President’s
Zoellick’s letter of March 2, 2010; Mr. Juan José Daboub’s letter of June 4, 2010 and a status report from INT on June 26, 2010.

President Zoellick’s letter confirmed his agreement with the recommendations made by the IAB and highlighted some specific points: (i) progress in adjusting INT’s strategy to introduce mechanisms to prevent fraud and corruption and make lending choices; (ii) the importance for INT to distill lessons learned to inform the design of new projects and ways to address high-risk sectors and the greater appreciation of the preventive role of Detailed Implementation Reports (DIRs); (iii) the role of INT as an integral part of the Bank dedicated to supporting the focus on high-level strategic initiatives, particularly the need to maximize the Bank’s integrity safeguards during crises; and (iv) the need for INT to have performance measures that capture both the strategic impact of major cases and the preventive aspects of its work.

Mr. Daboub in his letter of June 4, 2010 reiterated his broad agreement with the IAB Report. He took the opportunity to seek advice from the IAB on matters covered during the wrap-up with him and subsequent communications and highlighted in this report. They include: (i) ways for the Bank to enhance cooperation with national authorities; (ii) how to make an integrity compliance function work best in practice; (iii) recommendations for a mechanism that would create closer investigative ties among the multilateral development banks (MDBs).

In its status report (June 26), INT indicated that IAB advice helped it shape a new strategy, redefine its role in the World Bank, embed the Volcker recommendations and provide better links between INT’s results and the broader development effectiveness agenda. The various points discussed below elaborate further the Board’s advice to INT.

3. SUBSEQUENT DEVELOPMENTS TO THE ANNUAL REPORT AND RESPONSE

(i) On September 15, 2010, the Bank issued new Sanctions Procedures including amendments to the Sanctions Board Statute. INT noted the following changes: (a) adoption of debarment with conditional release as the ‘baseline’ or default sanction; (b) introduction of a formal mechanism for the negotiated resolution of sanctions cases; (c) improved guidance on dealing with corporate groups; (d) automatic temporary suspension; and (e) updated sanctioning guidelines. In addition, the Legal Department is presently completing a protocol on the review of Notices that clarifies relevant standards and procedures.

(ii) In response to the matters raised by the IAB, INT prepared an information note on the issuance of referral reports. Presently, INT writes and directs a referral report to relevant member governments at the conclusion of any investigation for which a final investigation report (FIR) has been issued. INT monitors any actions taken by Referral recipients. It may seek assistance from the Executive Director for the country concerned to obtain information on actions taken.

(iii) On November 9 INT wrote to the IAB reporting on developments. In this letter, INT reported on progress made in the previous five months on issues mentioned in the IAB’s annual report and subsequent follow-up by the IAB. Progress has been achieved in all areas and new
developments have occurred such as establishing integrity compliance measures to be adopted and implemented by debarred parties. In addition, INT has initiated forensic sample audits and is seeking the support of Regional Vice-Presidents for unresolved referrals. Discussions are ongoing on a possible Restitution Fund. INT has been working closely with regional staff to provide support to key operations and to extract lessons learnt from previous investigations that would inform regional management. Finally, INT’s confirmation of its commitment to pursuing high-profile, multidimensional cases was welcomed by the IAB.

4. INT IN THE YEAR 2010

The IAB notes that the INT department has made important strides in building its relationships with internal and external partners and in raising its profile as an integral and valued component of the WB. Relationships internally have been strengthened by personal outreach to operations staff in Washington and the field, by expanded training activity led by its Preventive Services Unit, and by cross-posting and recruiting of personnel with operations experience.

The staffing of INT is nearing completion with approximately 100 professionals. The Preventive Services Unit is operating effectively in a number of areas and its potential for strategic impact has become clear. The IAB notes that the PSU remains stretched in terms of personnel to cover the demands for its activity, and reiterates its call for several additional professionals to be added to its roster.

During the year under review, INT has focused greater attention than in the past on exploiting opportunities for strategic impact in the struggle against corruption. The IAB notes that the April 2010 cross-debarment agreement among MDBs has already begun to operate in both directions; this is a milestone for the Bank. The IAB is pleased to see INT and sister departments working together to leverage the Bank’s policies through enhanced external relations and outreach to anti-corruption partners and sister institutions. This effort includes support of parallel investigations and cooperation agreements with other anti-corruption agencies and working to negotiate partial debarment settlements of major cases that may have been initiated elsewhere. The IAB believes that progress is being made on the number of referrals of cases to client governments for their follow up action. Public notice of referrals and of subsequent criminal investigations by national agencies is to be welcomed. (These topics are discussed in further detail below.)

Overall, the IAB finds that INT in 2010 is characterized by a refreshing commitment to proactive and forward-looking initiatives in the anti-corruption effort. The IAB believes that progress has been achieved in completing investigative reports and in moving a number cases forward into the sanctions process. It is clear, however, that considerable work remains to be done in clearing a still substantial caseload that has sometimes dragged on too long. Now that some progress has been achieved in sorting out procedural difficulties between INT, Office of Evaluation and Suspension (OES) and the Sanctions Board, this backlog needs to be cleared expeditiously.
5. KEY ISSUES

The IAB sees six key issues arising from these developments:

a. Referrals

INT has provided the IAB with an Information Note on the INT’s process for the issuance of referral reports which reports progress in the area. In several cases investigations or legal proceedings have been initiated and in a few even completed. In others, the response to the referrals is still uncertain. INT anticipates it will follow-up on these referrals.

Obviously, referrals will not always be successful in triggering law enforcement action immediately. Difficulties have been encountered not only with victim countries of the abuses; sometimes also law enforcement agencies in host countries of suspected bribers have been slow to react to allegations, even where domestic laws (implementing the UN Convention against Corruption of 2003 or the OECD Convention of 1997) clearly require such action. Finally, third parties, countries hosting suspect intermediaries or financial institutions involved in bribery, have not been proactive enough.

In its Annual Report of 2009 the IAB advocated a graduated response:

A staged approach could start with immediate contacts between INT and local law enforcement, escalating the notification, if need be, with diplomatic means, using the regular contacts of Country Directors with their local counterparts (typically the Minister of Finance). Public disclosure of the referral is not excluded but should be used very carefully, taking into account, both, law enforcement and political considerations.

Within the Bank, failure to react to referrals should lead to reporting to the Audit Committee, in order to bring the difficulties to the attention of the Executive Directors.

Serious lack of political will could lead to more robust measures like the suspension of lending within a certain sector and, in the extreme case, suspension of lending in a country altogether (see the IAB’s Annual Report 2009).

As far as suspected bribers are concerned, it would be helpful to accept the offer of the Working Group on Bribery of the OECD to share information with the Bank. On the one hand such information sharing could allow the Bank to shorten its own procedures against companies already convicted for bank related offences by national courts; on the other hand referrals to host countries of suspected bribers via the OECD, after a Notice of Sanctions Proceedings (NOSP) has been filed, would make use of the OECD’s monitoring mechanisms (especially the Tour de Table) to ensure that cases are followed up.

b. Multilateral Cooperation

The IAB has been briefed about the recent conclusion of a “cross-debarment” agreement with the other major MDBs\(^1\). The IAB welcomes this development, even if the fine procedural detail needs to be further refined.

The scope of organisations involved could be extended to include key subsidiary organisations of the UN, like the UNDP and additional IFIs, like the European Investment Bank (EIB).

The IAB considers the agreement also a useful starting point for a wider information sharing agreement for investigative purposes.

It is understood, however, that sharing database information with other organisations raises legitimate concerns since such investigations are confidential. There would have to be a clear understanding of the use to which this information should be put. Protections for persons under investigation need to be foreseen.

c. Sanctions

In our 2009 Annual Report the IAB recommended as follows:

“It is in the interest of INT and WBG that cases sent to the OES are prepared to the highest possible standard. To do that we recommend that INT, OES and the Bank’s Legal Department clarify and agree on the elements of misconduct that need to be established and work from agreed definitions.”

It was clear to the IAB that disagreements over the necessary elements to prove a sanctionable practice had led to delays in dealing with a number of sanctions cases. These disagreements meant that a high number of cases referred to the OES by INT were returned.

The IAB is pleased that its 2009 recommendation was taken up. The Legal Vice Presidency (LEGVP) has now given rulings that clarify the points at issue. These rulings will be included in the sanctions manual so that INT, OES and indeed those under investigation are clear as to the matters that need to be proven to establish a sanctionable practice.

The Board has discussed the progress with INT, OES and LEGVP. Both INT and OES accept the rulings of LEGVP. Now that this is resolved we expect outstanding cases to be finalized expeditiously. They should be presented to the satisfaction of OES or, in the event that there is not enough material to do so, they should be closed.

A new World Bank sanctions procedure was adopted on September 15, 2010. This amplifies the procedure in relation to “conditional non-debarment” and “debarment with conditional release” (Article IX). To take advantage of these sanctions a party may be required to adopt and implement an integrity compliance program to be monitored by the “Integrity Compliance Officer” (ICO). In the event the ICO determines there has been non-compliance then debarment may follow or continuing debarment will occur instead of early release. A respondent may appeal the decision of the ICO to the Sanctions Board.

Although the IAB was not consulted in advance about the new sanctions procedure, the Board welcomes it since it provides a framework to implement compliance programs that are designed to lead to changed behavior and improved conduct in the future.
The ICO is to be lodged in the INT. In the IAB’s view the level of supervision required for the monitoring of compliance programs will be beyond the capability of one single officer. In some cases it will require at least one person (sometimes more) to supervise just one program for a large international company. The Board suggests there be an approved panel of people who could be asked to operate as dedicated external compliance monitors in particular cases to report back to the ICO. The IAB draws attention to the fact that there are already international standards established for such programs by other bodies which aim to fight corruption. The Board suggests the international standards be adopted and applied.

Under the new sanctions procedures a case may be settled at any time by agreement subject to the review of the Evaluation and Suspension Officer who is required “to ensure that the terms of the agreement do not manifestly violate the factors to be taken into account in determining an appropriate sanction” (Article XI, Section 11.02(b)). The Evaluation and Suspension Officer is not the person with jurisdiction to hear sanctions cases. That task falls to the Sanctions Board. It may be that the Sanctions Board should formally review and endorse a settlement. We understand that this sanctions procedure will be reviewed in a year’s time. The IAB recommends that as part of that review consideration be given to referring settlements to the Sanctions Board rather than the Evaluation and Suspension Officer. We believe the matters to be taken into account, however, should remain the same as set out in Section 11.02(b).

d. Policy considerations on Financial Settlements

The IAB endorses the use of financial settlements as a complement to debarment. The Board recommends that the Bank develop guidelines on how they should be administered.

The IAB takes the view that funds which are paid as part of the settlement of a sanctions case should be administered by an independent body. It is not acceptable for a party that has engaged in a sanctionable practice to administer a financial settlement itself. This gives it the opportunity to use what should be a punishment for its own advantage.

In some cases it may be appropriate to use funds paid under a financial settlement for rectification. In other cases it may be appropriate to fund a program of public interest – such as education against, or measures to combat, corruption. Independent outsiders will not think that the party paying the settlement is the party best placed to determine where the funds are applied.

e. Multiplicity of oversight mechanisms

There are multiple oversight bodies2 in the World Bank Group. The creation of these entities demonstrates numerous initiatives by the Bank to combat corruption and promote good governance.

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2 The descriptions of the various oversight bodies were adopted almost verbatim from available World Bank documents, with citations omitted.
External bodies include:

- Inspection Panel (IPN)
- Independent Advisory Board (IAB)
- External Advisory Group (EAG)

Bodies within the Bank include:

- Independent Evaluation Group (IEG)
- Integrity Vice Presidency (INT)
- Internal Audit Vice Presidency (IAD)

**Inspection Panel (IPN)**

“The Inspection Panel (IPN) was established by the Executive Directors of the International Bank for Reconstruction and Development (IBRD) and the International Development Association (IDA) on September 22, 1993. The Resolution establishing the Inspection Panel specifies that the Panel has jurisdiction with respect to operations (projects/programs) supported by the IBRD and the IDA. The Panel consists of three members (of different nationalities) who are appointed by the Board for non-renewable periods of five years. In addition to the three Panel members, an Executive Secretariat assists and supports all Panel activities. The Panel is independent of Bank Management and is provided with separate resources to discharge its functions.” The IPN, as an external fact-finding body, is mandated to determine whether the Bank is complying with its own policies and procedures, which “are intended to ensure that the projects and program it finances provide social and economic benefits and avoid harming people and the environment”.

**Independent Advisory Board (IAB)**

“An independent panel review of Integrity Vice Presidency (INT), chaired by Mr. Paul Volcker, concluded that it was necessary to set up the Independent Advisory Board (IAB) to help protect the independence and strengthen the accountability of INT. The World Bank Group created the Board and appointed its members on September 18, 2008, one year after the Volcker Panel made its recommendation. The IAB provides advice on a range of governance and anti-corruption measures, including how to help protect the independence and strengthen the accountability of INT. In that context, the IAB advises on: (1) policies and procedures; and (2) INT’s relations with the WBG.

The IAB seeks to complement and strengthen existing governance structures and responsibilities within the WBG and enhance the credibility of WBG efforts in fighting corruption both within and outside the Bank.”
External Advisory Group (EAG)

The World Bank Group approved in 2007 “both a new strategy for addressing the Governance and Anti-Corruption (GAC) dimensions of development, and a plan for its implementation.” The External Advisory Group (EAG), composed of seven members, was established in the fall of 2008 and met the first time in December 2008. “The purpose of the EAG is to provide a mechanism whereby the selected eminent persons can:

(i) Provide feedback to WBG management on the extent of progress, lessons, learned, and guidance for the way forward in implementing the GAC strategy, and

(ii) Communicate to external stakeholders what they observe as to the effectiveness with which WBG management is implementing the strategy.”

The members of EAG were “drawn from both developed and developing countries” and are considered “eminent public personalities and technical experts on governance issues”.

Independent Evaluation Group (IEG)

The Independent Evaluation Group (IEG) is an independent unit within the World Bank Group initially established as a department on July 1, 1973. Though an internal unit, it reports directly to the Board of Executive Directors. It “is responsible for the assessment of the relevance, efficacy, and efficiency of World Bank Group operational programs and activities, and their contribution to development effectiveness. The Director-General, Evaluation (DGE), oversees all independent evaluation work, appraises other World Bank Group evaluation systems and methods, including self-evaluation methodologies, and discharges these responsibilities through the Independent Evaluation Group (IEG), which consists of entities in the Bank (IBRD/IDA), in the International Finance Corporation (IFC), and in the Multilateral Investment Guarantee Agency (MIGA).”

“An important part of this effort is to help countries build their own monitoring and evaluation systems. With such systems, governments and their development partners are able to prepare better national budgets and plans, manage their activities, and improve service delivery. These systems also help strengthen government accountability to civil society. Such capacity building is known in the international development community as Evaluation Capacity Development. IEG has been a strong advocate of such capacity development, and it is a part of IEG’s mandate. IEG provides capacity development advice and other support to countries and to operational areas within the Bank.”

Department of Integrity (INT)

The World Bank Group’s INT was created in April 2001. “In pursuing its mission of poverty reduction, the Bank strives to ensure that its own funds, and the funds entrusted to it, are used for their intended purposes. To this end, the Bank established the INT to help minimize fraud and corruption affecting Bank business, and to respond swiftly and effectively when fraud or
corruption occur.” Pursuant to the recommendations of the Volcker Panel, INT was elevated “from a Directorate to a Vice Presidency.” Mr. Leonard McCarthy was appointed on May 5, 2008 as INT’s first Vice President. Like the IEG, though it is the investigative arm of the WB, it is considered independent since its Vice President, unlike the regular Vice Presidents who report to a Managing Director, reports directly to the President and indirectly to the Audit Committee.

**Internal Audit Vice Presidency (IAD)**

The Internal Audit Vice Presidency (IAD) was established in 1974 for the purpose of providing “an independent and objective assurance and advisory function designed to add value to the WBG by improving the operations of the WBG organizations. It assists WBG in accomplishing its objectives by bringing a systematic and disciplined approach to evaluate and improve the effectiveness of the organization’s risk management, control, and governance process.”

“IAD’s work primarily focuses on determining whether the Bank Group’s risk management, control, and governance processes provide reasonable assurance that [inter alia]:

- Significant financial, managerial, and operating information is accurate, reliable, and timely.
- Actions of the organization are in compliance with policies, procedures, contracts, and applicable laws and regulations.”

Since the above-mentioned bodies were not created at the same time it is possible there is overlap and duplication. The IAB understands that the Board of Directors has mandated an independent review of five “Is” (IAD, INT, IEG, CAO3 AND IPN). The IAB believes it is important to review the functions and inner workings of these entities. We would also encourage Bank management to look at the other entities mentioned above. In terms of efficiency, such a study should ensure that there is no replication of work and that certain cases do not fall through the cracks. The study’s objective should be to rationalize and streamline the jurisdictions of these various oversight mechanisms to achieve maximum efficiency and effectiveness.

f. *Program Leading/Budget Support*

In its interactions with Bank management and staff, the IAB has periodically raised the question of whether the Bank’s anti-corruption efforts should be confined to fraud, misprocurement and bribery risks in specific lending operations (SILs) that are linked to individual projects. IAB members believe that preventing bribery related to overpriced lab equipment or over-invoiced vehicles – while important – should be held in perspective alongside much larger lending and consequent risk in relation to other Bank operations.

We are aware of the significant challenges and difficulties concerning efforts to investigate the extent, if any, of corrupt behaviors that may arise in connection with the implementation of DPOs (Development Policy Operations). However, the IAB believes that the Bank must be careful it does not overlook corruption risks related to DPO grants, credits, and loans that are

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3 Compliance Advisor Ombudsman (for IFC and MIGA).
used to support a wide range of governance and capacity building policies and programs undertaken by member governments. This is especially important in light of the significant share of Bank operations that take the form of DPOs (some 34% of total Bank operations over the past 6 years and over 40% in the case of middle income countries).

Bearing these factors in mind, the IAB encourages Bank management to consider ways and means of sharpening the criteria for DPO activities (and those of future RBLs (Results Based Lending)) to include explicit reference to anti-corruption policies and programs as a central component of “governance”. Such action could serve the positive goal of sensitizing both member countries and Bank staff to the centrality of the worldwide struggle against bribery and corruption.
Annex 1

List of People Met in 2010 by the Independent Advisory Board (IAB)

World Bank Staff

Juan Jose Daboub, Managing Director (via video conference)
Sri Mulyani Indrawati, Managing Director
Audit Committee (via conference call)
Anne-Marie Leroy, Senior Vice President and General Counsel, Legal (LEGVP)
Leonard McCarthy, Vice President, Institutional Integrity (INT)
Joachim Von Amsberg, Vice President, Operation Policy and Country Services (OPCVP)
Sanjay Pradhan, Vice President, World Bank Institute (WBIVP)
Fathi Kemicha, Chair, Sanctions Board Secretariat (SBU)
Pascale Helene Dubois, Evaluation and Suspension Officer, Office of Evaluation and Suspension (OES)
Jane Armitage, Country Director, South East Europe Country Unit, Europe and Central Asia Region (ECCU4)
Peter Harrold, Country Director, South Central Europe and the Baltic Countries, Europe and Central Asia Region (ECCU5),
Paul Bermingham, Director, Operations Services, Operation Policy and Country Services (OPCOS)
Galina J. Mikhlin-Oliver, Director, Strategy and Core Services, Institutional Integrity (INTSC)
Alfred Nickesen, Director, Central Operational Services, East Asia and Pacific Region (EAPCO)
Stephen Zimmermann, Director, Operations, Institutional Integrity (INTOP)
Andras Horvai, Country Manager, Croatia, Europe and Central Asia Region (ECCHR)
Wayne Nardolillo, Manager, Strategy and Core Services, Institutional Integrity (INTSC)
Michael Stefanovic, Manager, Operations, Institutional Integrity (INTOP)
Nicholas Paul Manning, Adviser, Public Sector Governance, Poverty Reduction and Economic Management (PRMPS)
Robert Saum, Adviser to Managing Director Sri Mulyani Indrawati
Elizabeth Lin Forder, Sr. Counsel and Secretary to the Sanctions Board, Sanctions Board Secretariat (SBU)
Amitabha Mukherjee, Lead Public Sector Specialist, Poverty Reduction and Economic Management, Europe and Central Asia Region (ECSP4)
Anders Hjorth Agerskov, Lead Specialist, Strategy and Core Services, Institutional Integrity (INTSC)
David Hawkes, Lead Specialist, Operations, Institutional Integrity (INTOP)
Navita Srikant, Lead Forensics Specialist, Strategy and Core Services, Institutional Integrity (INTSC)
Sanja Madzarevic-Sujster, Senior Country Economist, Croatia, Europe and Central Asia Region (ECSP2)
Paul Ezzeddin, Sr Policy Officer, Office of Evaluation and Suspension (OES)
Jamieson Smith, Consultant, Office of Evaluation and Suspension (OES)
Staff, World Bank Croatia Office

Croatia Government officials and people met in Croatia

H.E. Ivo Josipovic, President of Croatia
H.E. Jadranka Kosor, Prime Minister
H.E. Ivan Simonovic, Minister of Justice
Mr. Ana Garacic, Deputy Chief Justice
Mr. Drazen Bosnjakovic, State Secretary, Ministry of Justice
Mr. Mladen Bajic, State Attorney General
Mr. Dinko Cvitan, Head of Office for the Prevention of Corruption and Organized Crime (USKOK) and USKOK leadership team
Mr. Zeljko Jovanovic, National Council for Anticorruption
Ms. Mirijana Jelenic, County SAO, Istria County
Mr. Josip Miletic, deputy County SAO, Istria County
Mr. Aleksandar Puh, Municipal SAO, Pula Municipality
Ms. Doris Brnobic Rajlic, Deputy Municipal SAO, Criminal law department, Pula Municipality
Mr. Vedran Rubelj, Deputy Municipal SAO, Civil law department, Pula Municipality
Mr. Zorislav Petrovic, Transparency International
Ms. Sandra Pernar, NGO “Gong”
Ms. Marina Skrabalo, NGO “Gong”, H-Alter, ZamirNET
Annex 2

Visit of the Independent Advisory Board
Croatia
June 26-30, 2010

IAB Members: Mr. Peter Costello
Mr. Chester Crocker
Mr. Simeon Marcelo
Mr. Mark Pieth
IAB Secretariat: Ms. Denyse Morin, Senior Operations Officer, OPCIL

INT Representative: Mr. Leonard Frank McCarthy, Vice President
ECA Representatives: Mr. Peter Harrold, Country Director
Mr. Andras Horvai, Country Manager
Mr. Amitabha Mukherjee, Lead Public Sector Specialist
Ms. Sanja Madzarevic Sujster, Senior Country Economist

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<tr>
<th>Time</th>
<th>Venue</th>
<th>Meeting/Event</th>
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<tr>
<td><strong>Saturday, June 26</strong></td>
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<tr>
<td>19:30</td>
<td>Restaurant “Pod grickim topom”, Zakmardijeve stube;</td>
<td>Working dinner</td>
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<td></td>
<td>Zagreb Airport</td>
<td>Arrival of IAB members and transfer to the hotel</td>
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<td><strong>Sunday, June 27</strong></td>
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<td>9:00 am</td>
<td>Hotel Esplanade lobby</td>
<td>Check-out and departure to Pula by mini bus</td>
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<td>12:30</td>
<td>Hotel Histria Pula</td>
<td>Check-in</td>
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<td>13:00</td>
<td>Restaurant Taverna</td>
<td>Lunch</td>
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<td>14:30</td>
<td>Hotel Histria Pula, meeting room</td>
<td>Working afternoon</td>
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<tr>
<td>19:30</td>
<td>Restaurant “Valsabbion”</td>
<td>Dinner hosted by Mr. McCarthy</td>
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<td><strong>Monday, June 28</strong></td>
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<td>9:30-11:00</td>
<td>Municipal Prosecutor Office</td>
<td>Meeting with County and Municipal prosecutors</td>
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<td>11:30-13:00</td>
<td>Existing Courthouse (historic building)</td>
<td>Meeting with County and Municipal Judges</td>
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<td>13:15-14:30</td>
<td>Caffee Qupola (Zlatna vrata)</td>
<td>Light lunch</td>
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<td>19:30-20:30</td>
<td>WB premises</td>
<td>VC with IAB (Mr. Daboub)</td>
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<td><strong>Tuesday, June 29</strong></td>
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<tr>
<td>9:30-11:00</td>
<td>USKOK Office</td>
<td>Meeting with Mr. Dinko Cvitan, Head of Office for the Prevention of Corruption and Organized Crime (USKOK) and USKOK leadership team</td>
</tr>
</tbody>
</table>
| 12:30-14:30   | Restaurant “Klub knizevnika” Trg bana Jelacica | Lunch with:
|               |                                            | Mr. Zeljko Jovanovic, National Council for Anticorruption |
|               |                                            | Mr. Zorislav Petrovic, Transparency International          |
|               |                                            | Ms. Sandra Pernar, NGO “Gong”                             |
|               |                                            | Ms. Marina Skrabalo, NGO “Gong”, H-Alter, ZamirNET         |

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<table>
<thead>
<tr>
<th>Time</th>
<th>Location</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>15:00-16:00</td>
<td>WB premises Radnicka cesta 80/IX</td>
<td>Meeting with staff</td>
</tr>
<tr>
<td>19:30</td>
<td>Restaurant “Gallo”</td>
<td>Dinner with: Ivan Simonovic, Minister of Justice, Ana Garacic, Deputy Chief Justice, Mladen Bajic, State Attorney General, Drazen Bosnjakovic, State Secretary, Min.of Justice,</td>
</tr>
</tbody>
</table>

**Wednesday, June 30**

<table>
<thead>
<tr>
<th>Time</th>
<th>Location</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:20</td>
<td>Hotel lobby</td>
<td>Departure to the Office of the President</td>
</tr>
<tr>
<td>9:00-9:45</td>
<td>President’s Office</td>
<td>Meeting with H.E. Ivo Josipovic, President of Croatia</td>
</tr>
<tr>
<td>10:00-10:30</td>
<td>Government’s premises Markov trg 2</td>
<td>Meeting with H.E. Jadranka Kosor, Prime Minister</td>
</tr>
<tr>
<td>10:30</td>
<td>Hotel Esplanade</td>
<td>Departure to the hotel by cars</td>
</tr>
<tr>
<td></td>
<td></td>
<td>IAB internal meeting</td>
</tr>
</tbody>
</table>
INDEPENDENT ADVISORY BOARD (IAB) MEETING
November 29-30, 2010
Washington, DC

Monday, November 29, 2010 (MC 10-348)

0900       Arrival at the World Bank – Internal discussions

1030—1130: Meeting with Leonard McCarthy, Vice President, INT

1200—1245: Meeting with INT management and selected staff (to be determined)

1245—1400: **MC Private Dining Room G**
            Luncheon hosted by Joachim Von Amsberg, Vice President, OPCS
            Paul Bermingham, Director, OPCOS

1430—1730: IAB - Internal discussions including advice requested by President Zoellick (VP INT and
            managers available if necessary)

1900       **MC Private Dining Room F**
            Dinner hosted by Ms. Sri Mulyani Indrawati, Managing Directors
            with selected VPs/Directors

Tuesday, November 30, 2010

0930—1015: **MC6-313**
            Meeting with Ms. Anne-Marie Leroy, Vice President, Legal (LEG) and General Counsel

1100—1230: **MC10-348**
            Dr. Fathi Kemicha, Chair, Sanctions Board and Ms. Elizabeth Lin Forder, Secretary to the
            Sanctions Board

1300—1415: **MC Dining Room**
            Lunch hosted by Leonard McCarthy, Vice President, INT

1430—1530: **MC 12-787**
            Wrap—up meeting with Ms. Sri Mulyani Indrawati, Managing Director

1530—1700: **MC10-348**
            Internal wrap-up