"Truth never damages a cause that is just"
- Mahatma Gandhi -
# Acronyms and Abbreviations

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AML/CFT</td>
<td>Anti-Money Laundering/Combating Financing of Terrorism</td>
</tr>
<tr>
<td>AfDB</td>
<td>African Development Bank</td>
</tr>
<tr>
<td>CHRM</td>
<td>Human Resources Management Department</td>
</tr>
<tr>
<td>CII</td>
<td>Conference of International Investigations</td>
</tr>
<tr>
<td>CIMM</td>
<td>Corporate Information Management and Methods Department</td>
</tr>
<tr>
<td>CRMU</td>
<td>Compliance Review and Mediation Unit</td>
</tr>
<tr>
<td>CSVP</td>
<td>Corporate Services, Vice Presidency</td>
</tr>
<tr>
<td>ERBD</td>
<td>European Bank for Reconstruction and Development</td>
</tr>
<tr>
<td>EIB</td>
<td>European Investment Bank</td>
</tr>
<tr>
<td>FoSP</td>
<td>Findings of Sanctionable Practice</td>
</tr>
<tr>
<td>GECL</td>
<td>General Counsel and Legal Services Department</td>
</tr>
<tr>
<td>IACD</td>
<td>Integrity and Anti-Corruption Department</td>
</tr>
<tr>
<td>IADB</td>
<td>Inter-American Development Bank</td>
</tr>
<tr>
<td>IsDB</td>
<td>Islamic Development Bank</td>
</tr>
<tr>
<td>IDD</td>
<td>Integrity Due Diligence</td>
</tr>
<tr>
<td>OAGL</td>
<td>Office of the Auditor General</td>
</tr>
<tr>
<td>ORPF</td>
<td>Procurement and Fiduciary Services Department</td>
</tr>
<tr>
<td>ORQR</td>
<td>Quality Assurance and Results</td>
</tr>
<tr>
<td>RMC</td>
<td>Regional Member Country</td>
</tr>
<tr>
<td>SADC</td>
<td>South African Development Community</td>
</tr>
<tr>
<td>SAFAC</td>
<td>Southern African Forum Against Corruption</td>
</tr>
<tr>
<td>SEGL</td>
<td>Vice-Presidency Secretariat General</td>
</tr>
</tbody>
</table>
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Contact Us
IACD’s mandate is underpinned by the Bank’s zero-tolerance to corruption. It is aligned with the AfDB’s broader commitment to combating corruption and improving governance under its 2013-2022 strategic framework.

2013 was a landmark year for IACD, as the Bank’s new sanctions regime came into full operations. Findings of Sanctionable Practices (FoSP) based on our investigations are submitted to the Bank’s independent Sanctions Commissioner, who evaluates the evidence and imposes sanctions on entities that have been found to have engaged in sanctionable practices. Entities can appeal the decision of the Sanctions Commissioner to the Sanctions Appeal Board. The new regime separates the investigation function, the decision making function and the appeals function to ensure due process and transparency. In August IACD submitted four FoSPs for evaluation to the Sanctions Commissioner.

Another innovation of significance was the creation of the Integrity Risk Tool which is a platform on the Bank’s intranet that hosts a database of entities that may pose integrity risk to the Bank Group. Task Managers can consult that database and request integrity opinions from IACD in order to reduce integrity violations in Bank-financed activities.

In 2013, IACD introduced voluntary settlement agreements with respondents who admit the commission of sanctionable practices.

Africa has for far too long been viewed as a development challenge – a continent saddled with problems of bad governance, conflict and economic mismanagement. But today, a new image is emerging as the region is embracing social and economic reforms which will allow it to take advantage of its immense potential, thus making Africa the premier destination for economic growth and development in the next decade.

With around one-third of its countries growing by more than 6% on annual basis, Africa has become the world’s fastest-growing continent. Africa’s new economic dynamism could not have happened without sustainable improvements in governance. Effectively addressing corruption on the continent is a priority for development effectiveness. To be able to do this, we need the full support and collaboration of everyone including Bank staff, civil society organizations and government institutions. It is only through a concerted effort that we will be able to get rid of the scourge of corruption. An environment of Zero Corruption will enable Africa to achieve the development, growth and prosperity required for the continent to reach its full potential.

IACD will continue with its relentless effort in the fight against corruption.
1. About IACD

1.1 The Integrity and Anti-Corruption Department

The African Development Bank Group’s Integrity and Anti-Corruption Department (IACD), comprises two (2) divisions.

The Integrity and Prevention Division (IACD.1) supports the Bank Group’s mission to spur sustainable socioeconomic development on the African continent by developing proactive measures to reduce the potential for misconduct in operations and transactions financed by the Bank Group. The Investigative Division, IACD.2 builds upon this support by carrying out investigations into allegations of fraud, corruption and malpractices in Bank group financed operations. Together, IACD.1 and IACD.2 prevent, detect, and deter coercion, collusion, corruption, fraud, and obstruction (together, “Sanctionable Practices”) in operations financed by the Bank Group.
2. The 2013 Annual Report

1.1 2013 Annual Report

The 2013 Annual Report provides an overview of IACD’s activities between January and December 2013.

The report builds upon IACD’s previous progress reports, submitted to the Bank Group’s Board of Directors and outlines significant events in the reported year.

The rest of this report is divided into six sections outlining significant events of both preventive and investigative activities, and projections for 2014.
When we are "Transparent we build Trust"...
3. IACD’s Preventive Programmes

IACD implements the Bank Group’s preventive strategy by developing tools and proactive measures to minimise integrity risks in the Bank Group. In 2013, IACD coordinated and participated in campaigns and outreach programmes on integrity related concerns for both employees of the Bank Group and its partners. The division also provided expert integrity advice to optimise governance standards within the Bank Group. These activities are outlined below.

### 3.1 Training for Staff Members of the Bank Group

A core aspect of IACD’s proactive approach is to mainstream anti-corruption and integrity strategies within operations of the Bank Group.

IACD finds that training sessions with staff members provide ample opportunities to help incorporate these strategies in bank operations.

In 2013, IACD provided integrity themed training in ten (10) induction sessions for staff members at the temporary relocation agency in Tunisia and field offices. The department further provided enhanced integrity guidance to eight (8) staff members as part of the Office of the Ombudsperson’s Values Promotion Champions initiative.

IACD provided sessions on how Values Promotion Champions may work with the integrity function in promoting a grievance-free work environment.

### 3.2 Outreach Events in Regional Member Countries

As part of disseminating information on its work and providing an avenue for feedback on the implementation of projects by the Bank Group, IACD held various outreach programs with civil society organisations, government agencies and the private sector in 2013.

These included workshops held in collaboration with the Compliance Review Mediation Unit (CRMU), Quality Assurance and Results Department (ORQR), and the Vice-Presidency Secretariat General (SEGL) with over 127 participants in Ouagadougou, Burkina Faso and in Kampala, Uganda in March 2013. IACD and CRMU also held workshops in June 2013 in Pretoria, South Africa themed on optimising accountability and transparency in Bank Group financed projects. Participants included representatives from government agencies, project implementation units and civil society from Botswana, Lesotho, Namibia, Swaziland and South Africa. A similarly themed event, with emphasis on collaboration was held in Windhoek, Namibia in August 2013.

### 3.3 Tools to Mitigate Integrity Risk

As part of IACD’s mandate, IACD develops tools to mainstream anti-corruption initiatives and good governance into Bank Group operations and transactions. In 2013, IACD’s mainstreaming activities included the enhancement of due diligence practices within the Bank Group.
When we are “Partners against corruption, there is Integrity”...
3.3.1 Integrity Due Diligence Framework for Non-Sovereign Operations.

IACD worked within an inter-departmental group to create the Integrity Due Diligence (IDD) framework for the Bank’s non-sovereign operations. Building from two of the Bank’s operational priorities in the 2013 - 2022 Strategy, the IDD framework seeks to mitigate integrity risk in order to improve private sector development and optimise governance and accountability. IDD identifies, assesses, mitigates, manages and monitors the potential for loss and adverse reputational impact from the Bank’s investment decisions and projects. It is anticipated that the IDD framework will be approved by the Board of Directors in the first quarter of 2014.

3.3.2 Integrity Risk Tool.

In 2013, IACD, together with the Procurement and Fiduciary Services (ORPF) and with technical support from the Corporate Information Management and Methods Department (CIMM), created the Integrity Risk Tool. The tool is an intuitively designed platform that hosts a database of entities that may present integrity risk to the Bank Group. The database includes entities and persons debarred and cross-debarred by the Bank Group as well as by other leading multilateral institutions. In addition, the platform allows the Bank staff to formally request for integrity risk opinions in the Bank Group’s operations. The Integrity Risk Tool offers significant proactive benefits by minimising the potential for loss that may accrue to the Bank Group through contractual relationships that may pose reputational and operational risks. The platform is exclusively accessible through the Bank’s intranet pages.

3.4 Integrity Advisory Services

IACD’s core competences include expert advice on integrity risk management and policy support on integrity concerns. Some of the division’s policy support to units within the Bank Group on operational and project matters are highlighted below:

3.4.1 Integrity Opinions Requested through the Integrity Risk Tool.

IACD provided to Bank staff, 8 integrity risk opinions relating to proposed projects in the Bank. Recipients of these opinions included field offices, as well staff in public and private sector functions in Tunis, Tunisia.

3.4.2 Support on Internal Bank Group Documents.

As part of inter-departmental working groups, IACD contributed to the drafting of, and review of the Bank’s proposed Policy on Non-Sovereign Operations, led by the Strategy and Operational Policies Department (COSP), the Guidelines on the Cancellation of Approved Private Sector Loans led by the General Counsel & Legal Services Department (GCL), and policy documents related to the creation of the Bank’s Staff Integrity and Ethics Office (SIEO). IACD also advised on the draft of the Sanctions Procedures for the Bank Group’s Sanctions Office, the first-tier of the sanctions regime. Further policy contribution also went into the development of the Presidential Directive on the Security of Information and Appropriate Use of Communications Systems, which established principles for the use and management of the Bank’s data and information technology issues.

3.4.3 Opinions on General Integrity Issues.

In the year in review, IACD provided on behalf of the Bank Group and to third parties, opinions on the Bank’s Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) strategy, review mechanisms for anti-corruption and fraud measures, and controls around decentralisation reforms. In addition, IACD advised on the Bank Group’s Governance Strategy and Action Plan for 2014 - 2018, and on the draft standards bidding documents the corporate procurement.
AfDB adopts a “Zero Tolerance Against Corruption”...
4.1 Case Statistics

The primary role of the Investigations Division, IACD.2, is to investigate allegations of Sanctionable Practices and other malpractices in operations financed by the Bank Group. In 2013, IACD.2 caseload grew by 65.3% bringing the total cases to 81 from 49 as at December 2012.

The case statistics are outlined below:

<table>
<thead>
<tr>
<th>Case Description</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cases closed after preliminary inquiry</td>
<td>18</td>
</tr>
<tr>
<td>Completed investigations</td>
<td>12</td>
</tr>
<tr>
<td>Ongoing investigations</td>
<td>40</td>
</tr>
<tr>
<td>Cases carried over to 2014</td>
<td>11</td>
</tr>
</tbody>
</table>

4.2 Investigations Manual

During the year 2013, IACD reviewed its Investigations Manual; an extensive document that provides guidance for the conduct of internal and external investigations. The manual provides principles and standards for the conduct of investigations and builds on existing obligations of the Bank codified in a range of agreements including the Uniform Framework for Preventing and Combating Fraud and Corruption as well as the framework for the sanctions regime.

4.3 Information Governance Initiatives

In order to enhance its information management processes, IACD conducted an information audit of its files. As part of this process, IACD carried out a records retention schedule for business records and a comparative study on enterprise information management systems, as well as a reference visit to the International Criminal Court to evaluate the functionality, user experience and deployment for its information system. IACD has approved the acquisition of its enterprise information management system and will deploy and integrate this system at the IACD offices in Cote d’Ivoire in 2014.
“Your No Counts”...
5. Other Significant Developments

5.1 Modification of IACD’s Mandate

The Board of Directors of the Bank Group had in 2012, delegated investigations of staff misconduct unrelated to Sanctionable Practices to the Staff Integrity and Ethics Office (SIEO). The SIEO however became operational in November 2013. IACD continues to work with the SIEO guided by a protocol that enhances the comparative strengths of both oversight functions.

5.2 Appointments of Officials to the Sanctions Regime

On 11 February 2013, the Board of Directors approved the appointment of members of the Bank Group’s sanctions regime, including the Sanctions Commissioner and the alternate. The members of the Sanctions Appeal Board and their alternates were also appointed, giving effect to the efforts to ensure an efficient, effective and fair sanctions process against entities alleged to have participated in Sanctionable Practices.

5.3 IACD’s First Submissions to the Sanctions Commissioner

In a formal ceremony held on 20 August 2013, IACD submitted 4 Reports known as Findings of Sanctionable Practices (FoSP) to the Sanctions Commissioner as provided for under the Bank’s New Sanctions Regime. The Sanctions Commissioner will in turn evaluate the evidence and impose sanctions where appropriate.

Ms. Anna Bossman handing over the first batch of FoSP to the Sanctions Commissioner.

5.4 Cross Debarments

In 2013, IACD received and recognised 284 debarment decisions from Participating Institutions under the Agreement for Mutual Enforcement of Debarment Decisions. Of these, four (4) were from the Asian Development Bank, eight (8) from the Inter-American Development Bank, while 272 were from the World Bank Group.

5.5 Settlement Agreements

A significant innovation of the Bank Group’s sanctions regime is the introduction of settlement negotiations prior to the issuance of a decision by the Sanctions Commissioner or the Sanctions Appeals Board. Settlement proposals in accordance with Section 15 of the Bank’s Sanctions Procedures, are reviewed by the General Counsel of the Bank to ensure that they do not manifestly violate Bank policies, and also by the Sanctions Commissioner, to ensure fairness, transparency and credibility. In 2013, IACD entered into discussions on settlement agreements with a number of respondents and foresees potential resolutions in 2014.
5.6 Commemoration of the International Anti-Corruption Day

Between 9 December and 11 December, IACD joined international organisations in commemorating International Anti-Corruption Day. The 2013 campaign, themed "Zero Corruption - 100% Development" commenced with a formal statement by Dr Donald Kaberuka, President of the Bank Group in which he commented on the threat posed by corruption to democratic institutions and the rule of law. IACD also conducted training sessions with 65 staff members from the Transport and Information Communication Technology Department (OITCO), Private Sector Operations Department (OPSM) and Human and Social Development Department (OSHD), tailored for effective integrity strategies.
6. Collaboration and Development

6.1 Collaboration

6.1.1 Conference of International Investigators.

IACD on behalf of the AfDB, hosted the 14th Conference of International Investigators (CII) in Tunis, Tunisia. The CII is an annual event during which international investigators discuss issues on enhancing the global fight against corruption. The Franz-Hermann Brüner (FHB) Memorial Lecture was delivered by Professor Wole Soyinka, recipient of the 1986 Nobel Prize in Literature. In his highly appreciated lecture entitled “Hydropsis: Professor Soyinka likened corruption to a creature which was a cross between an octopus and the mystical multiheaded dragon as a representation of the endless and self-replicating ramifications of corruption.

6.1.2 Multilateral Development Banks’ Heads of Integrity Meeting and Private Sector Integrity Conference.

In May 2013 IACD participated in the annual Heads of Integrity Offices and Private Sector Integrity Conference hosted by ERBD. At the meeting, IACD contributed to discussions on enhanced harmonised approach to manage integrity risks in projects.

At the Private Sector Integrity Conference, IACD led a delegation of staff from the Bank’s integrity function, legal and private sector departments in reviewing issues ranging from challenges faced in optimising intelligence and other data from integrity due diligence in private sector operations, complications in executing IDD for convoluted structures.

During the discussions, participants agreed to consider standardised definitions of risks, as well as minimal standards in executing IDD.

6.1.3 Memoranda of Understanding to Enhance Collaboration.

In furtherance of exploration of mechanisms for mutually beneficial arrangements in the fight against corruption, IACD executed eleven (11) memoranda of understanding to govern formal frameworks with international institutions and independent oversight functions.

These memoranda now manage relationships between the parties and IACD, focusing on institutional capacity building initiatives, national, regional and international seminars; review and research activities, as well as development of peer-to-peer partnerships.

In this regards MOUs were concluded with the Islamic Development Bank, and independent oversight functions in the Democratic Republic of Congo, and members of the Southern African Development Cooperation (SADC) and Southern African Forum against Corruption (SAFAC).
## 6.2 Training and conferences

### External Events

<table>
<thead>
<tr>
<th>Theme</th>
<th>Convener / Trainer</th>
<th>Month</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>3rd Fraud and Corruption Africa Summit</td>
<td>MIS Training Institute</td>
<td>March</td>
<td>Johannesburg, South Africa</td>
</tr>
<tr>
<td>Optimal investigative strategies for sanctionable practices</td>
<td>Head of the World Bank’s Special Litigation Unit</td>
<td>May</td>
<td>Tunis, Tunisia</td>
</tr>
<tr>
<td>Contemporary insight in corruption theories and anti-corruption practices</td>
<td>International Anti-Corruption Summer Academy’s (IACSA)</td>
<td>July</td>
<td>Austria</td>
</tr>
<tr>
<td>Training Course for International Anti-Corruption Practitioners</td>
<td>Anti-Corruption and Civil rights Commission of Korea</td>
<td>July</td>
<td>Seoul, Korea</td>
</tr>
<tr>
<td>Conference of International Investigators</td>
<td>MDBs</td>
<td>September</td>
<td>Tunis, Tunisia</td>
</tr>
<tr>
<td>Effective Project Coordinator Training Course</td>
<td>Institute for International Research, Middle East</td>
<td>September</td>
<td>Dubai, United Arab Emirate</td>
</tr>
<tr>
<td>Certification for “Certified Integrity Officers”</td>
<td>Malaysia Anti-Corruption Commission</td>
<td>October</td>
<td>Johannesburg, South Africa</td>
</tr>
</tbody>
</table>

### Internal Events

<table>
<thead>
<tr>
<th>Theme</th>
<th>Malaysia</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Risk Management Training</td>
<td>Security Unit</td>
<td>May</td>
<td>Tunis, Tunisia</td>
</tr>
<tr>
<td>Identifying Procurement Fraud</td>
<td>ORPF</td>
<td>October</td>
<td>Tunis, Tunisia</td>
</tr>
</tbody>
</table>

*Participants of Oil conference held in Tunis*
### 7.1 Staff’s Strength

At the end of 2013, IACD’s had nineteen (19) staff with fifteen Professional Level staff and four General Services staff. Of these, One (1) Executive Level, two (2) professional level and two general support staff are women. Although the staff strength reduced by the departure of two (2) Principal Investigators, the recruitment of one Principal Forensic Accountant and a Senior Integrity and Prevention Officer kept the total number of staff at 19. The restructuring of the department was also made effective with delineation of the prevention and investigation functions.

<table>
<thead>
<tr>
<th>Staffing Level</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
<th>Projected Increase or decrease for 2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>Director</td>
<td>OIC</td>
<td>1</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>IACD.1</td>
</tr>
<tr>
<td>Division Manager</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Chief</td>
<td>-</td>
<td>2</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Principal</td>
<td>7</td>
<td>9</td>
<td>2</td>
<td>7</td>
</tr>
<tr>
<td>Senior</td>
<td>3</td>
<td>2</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>General Services</td>
<td>2</td>
<td>4</td>
<td>4</td>
<td>-</td>
</tr>
<tr>
<td>Total</td>
<td>12</td>
<td>18</td>
<td>19</td>
<td>-</td>
</tr>
</tbody>
</table>

*The positions for Division Managers for both divisions were advertised in 2013.*
IACD aims to consolidate the gains made in 2013 by improving upon its core competencies in supporting the Bank’s Group Ten-Year Strategy. In this regard, IACD has highlighted the core areas below to enhance its impact.

8.1 Enhanced Integrity Strategies

Building upon proactive tools created in 2013, IACD will develop additional innovative methods to mitigate integrity risk in the Bank Group and its operations. IACD will further explore existing partnerships with institutions in regional member countries to develop proactive tools in efforts to mitigate corruption and harmful practices. In support of the Bank Group’s business continuity processes during the return to the headquarters in Abidjan, IACD has commenced a review of its own inventory management systems to minimise confidentiality breaches.

8.2 Enhanced Partnership with Operational Departments

IACD will enhance its collaborative activities with operational units within the Bank Group. Beyond outreach events, IACD has already commenced discussions in providing tailored integrity services for operational requirements.

8.3 Case Management

While IACD’s case management cycle was significantly shortened in 2013, IACD will strive to further accelerate the process and reduce the backlog of cases. IACD hopes to make 12 submissions to the Sanctions Commissioner by the end of 2014.

Zero Corruption - 100% Development.
Bank staff and the general public may use IACD’s secured hotlines to report fraud, corruption, coercion, collusion or obstructive practices within the Bank or operations financed by the Bank Group.

**Telephone**

Complaints may be reported to the secured telephone numbers below:

<table>
<thead>
<tr>
<th>Country</th>
<th>Number 1</th>
<th>Number 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Angola</td>
<td>808 000 011</td>
<td>888 361 5810</td>
</tr>
<tr>
<td>Benin</td>
<td>102</td>
<td>888 361 5810</td>
</tr>
<tr>
<td>Egypt</td>
<td>2510 0200</td>
<td>888 361 5810</td>
</tr>
<tr>
<td>Ghana</td>
<td>0191</td>
<td>888 361 5810</td>
</tr>
<tr>
<td>Republic of Côte d’Ivoire</td>
<td>00 111 11</td>
<td>888 361 5810</td>
</tr>
<tr>
<td>Morocco</td>
<td>010 11 0011</td>
<td>888 361 5810</td>
</tr>
<tr>
<td>South Africa</td>
<td>0 800 99 0123</td>
<td>888 361 5810</td>
</tr>
<tr>
<td>Zimbabwe</td>
<td>00-899</td>
<td>888 361 5810</td>
</tr>
</tbody>
</table>

In all other cases, complaints may be made to +1 (770) 776-5658. Complaints will be handled by French-, English- and Portuguese-speaking interview experts.

**Facsimile Number**

You may send information to IACD’s secure fax numbers:

(225) 203 20141

Please note that this is not a toll-free number, and normal local or long distance telephone charges will apply.

**Email**

Emails may be sent to the Department’s secure email server:

investigations@iacd-adfb.org

**In Person**

You may visit us in person at the Bank’s Temporary Relocation Agency:

Division Manager, IACD2
21st Floor
CCIA Building
Avenue Jean Paul II
Abidjan Plateau
Côte d’Ivoire

**Mail**

Correspondence should be marked “CONFIDENTIAL” and sent to:

Director
Integrity and Anti-Corruption Department
21th Floor
CCIA Building
Avenue Jean Paul II
01 BP 1387,
Abidjan, 01
Côte d’Ivoire.