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World Bank's Revised Integrity Compliance Guidelines: Key Takeaways

By Sam Eastwood, Johannes Weichbrodt, Kelly B. Kramer, Michel Sancovski, Edouard Gergondet, Paul Whitfield-Jones, Hormis Kallarackel and Elinam Odumala*

In this article, the authors review the revised Integrity Compliance Guidelines issued last year by the World Bank and explain that they are both a risk signal and an opportunity for entities participating in World Bank financed projects.

The World Bank last year issued the first full update of its Integrity Compliance Guidelines[1] in 15 years. The revised Guidelines set out the World Bank's standards and expectations of companies seeking conditional release from debarment. It also explores what is regarded as a credible integrity compliance programme for entities participating in World Bank financed projects.

In parallel, the World Bank's 2025 Annual Report reveals record levels of financing, a strategic focus on jobs and private sector mobilisation. Taken together, these factors suggest increased opportunity alongside the greater scrutiny for companies engaged in World Bank financed operations.

Whilst these Guidelines will not automatically apply to other multilateral development banks (MDBs), there is significant coordination and harmonisation among MDBs on integrity and sanctions standards, and many MDBs have mechanisms that result in close alignment.

For U.S.-headquartered groups and U.S.-listed issuers, these revisions also map closely onto familiar expectations around program effectiveness, third-party risk management, and investigation response. These are issues that can carry parallel consequences in U.S. enforcement and, for government-facing businesses, U.S. contracting, False Claims Act and related suspension and debarment risk.

The most important developments for businesses are:

- *Obstruction is to be addressed as an inherent risk.* Obstruction of audits

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1 https://documents1.worldbank.org/curated/en/099553012082564794/pdf/IDU-aa1f2ca2-33b5-4d3e-a56b-d76aba3ce93b.pdf.

or investigations is treated not only as a prohibited practice, but as a risk that must be addressed through policies, training and investigation protocols. Companies are expected to incorporate "no obstruction" principles into record keeping, audit response procedures, and staff guidance on interactions with MDB investigators.

- *Recurring risk assessments.* The Guidelines now explicitly call for regular (ideally annual) integrity risk assessments that cover business lines, geographies, third-party use, technology and lessons learned from incidents and enforcement. Ad hoc or one-off reviews are unlikely to be sufficient in higher risk sectors or markets.
- *Tighter controls on business development and bidding.* The Guidelines stress the accuracy of representations in bids and proposals, including CVs and past performance claims. Companies are encouraged to implement and document clear controls over who prepares, reviews, and approves submissions, with segregation of duties.
- *Technology and AI considerations.* Where technology (including AI tools or chatbots) is used for compliance guidance or screening, it should be subject to governance, tested and auditable. Technology risk should also be explicitly considered in risk assessments.
- *Expansions of provisions relating to whistleblowing, PEPs and "soft power" payments.* Reporting channels should extend to key third parties, with non retaliation protections. Definitions of public officials and Politically Exposed Persons (PEPs) have been broadened, and political donations, charitable contributions and sponsorships are treated as core compliance topics, subject to risk based due diligence, approvals and contractual safeguards.
- *More prescriptive third party and supply chain governance.* The Guidelines call for risk-based onboarding, robust contractual protections (including audit and termination rights), and ongoing monitoring of high-risk third parties, consortia, and joint ventures. They also call for evidence that controls work in practice.

These revisions to the Guidelines point to higher expectations from the World Bank for organisations seeking financing from the World Bank, particularly in the context of sustained sanctions activity, cross-debarment, and increased use of remedial action plans highlighted in the 2025 Annual Report. For organisations, a practical response should involve:

- Conducting a focused gap analysis of policies and procedures against the revised Guidelines;

- Tightening risk assessment processes, including technology and obstruction risk; and
- Enhancing business development, M&A and third party controls, supported by clear governance and documentation.

COMMENTARY AND ANALYSIS

The World Bank Group's revised Integrity Compliance Guidelines raise the bar for companies involved in World Bank financed projects. They sharpen expectations on programme design, implementation and testing, and sit alongside the World Bank Group Annual Report 2025, which highlights increased financing and continued reliance on sanctions, cross debarment and remedial action plans.

- *Obstruction and cooperation*. Obstruction of audits and investigations remains a prohibited practice, but is now also a programme-design issue. Companies should adopt clear prohibitions on obstructing World Bank and other MDB inquiries, robust document retention and legal hold procedures, investigation protocols for responding to MDB requests, and targeted training for project, finance, and client-facing staff. How a firm cooperates with MDB inquiries will be treated as a key indicator of programme maturity.
- *Integrity risk assessment*. The Guidelines call for comprehensive, regularly updated risk assessments covering the full workforce, affiliates, joint ventures and intermediaries, higher risk projects and markets, and lessons learned from incidents and enforcement. Boards and senior management are expected to engage directly. Organisations relying on sporadic or informal reviews will need structured, periodic assessments with documented outputs and follow through.
- *Culture, governance and "tone from the middle."* Formal policies are insufficient if incentives and behaviour diverge in practice. The Guidelines emphasise role modelling by middle management in commercial and operational roles, integrating integrity criteria into performance and promotion decisions, and regular, targeted communications that translate high level standards into concrete expectations. Compliance responsibilities, resourcing and reporting lines to senior management and the board should be clearly defined.
- *M&A and corporate development.* Acquisitions and other transactions are expressly in scope. Acquirers should assess targets' exposure to MDB financed projects, conduct risk based integrity due diligence (including MDB debarment checks and scrutiny of public sector

interactions), and implement post closing integration plans with clear ownership and milestones. Transaction documents for MDB financed deals are expected to include integrity representations, audit and information access rights, and mechanisms to adjust or exit where serious issues are identified, reflecting the increasingly group-wide treatment of MDB risk.

CONCLUSION

Overall, the revised Guidelines confirm that credible, well-governed integrity programmes are now central to accessing and maintaining eligibility for World Bank financed opportunities. For businesses, the revised Guidelines are both a risk signal and an opportunity. Those that proactively align policies, controls and culture with World Bank expectations—particularly around obstruction, risk assessment, bidding, M&A, and third-party governance—will be better placed to secure MDB financed work, manage investigations and preserve eligibility across global project portfolios.