



GOVERNMENT
PROCUREMENT

SESSION 3: ANTI-CORRUPTION

— FREE THREE-PART WEBINAR SERIES

New Directions in *International Development* Procurement

July 20 • 22 • 24, 2026

9:00 AM ET • 15:00 CET • 18:30 IST



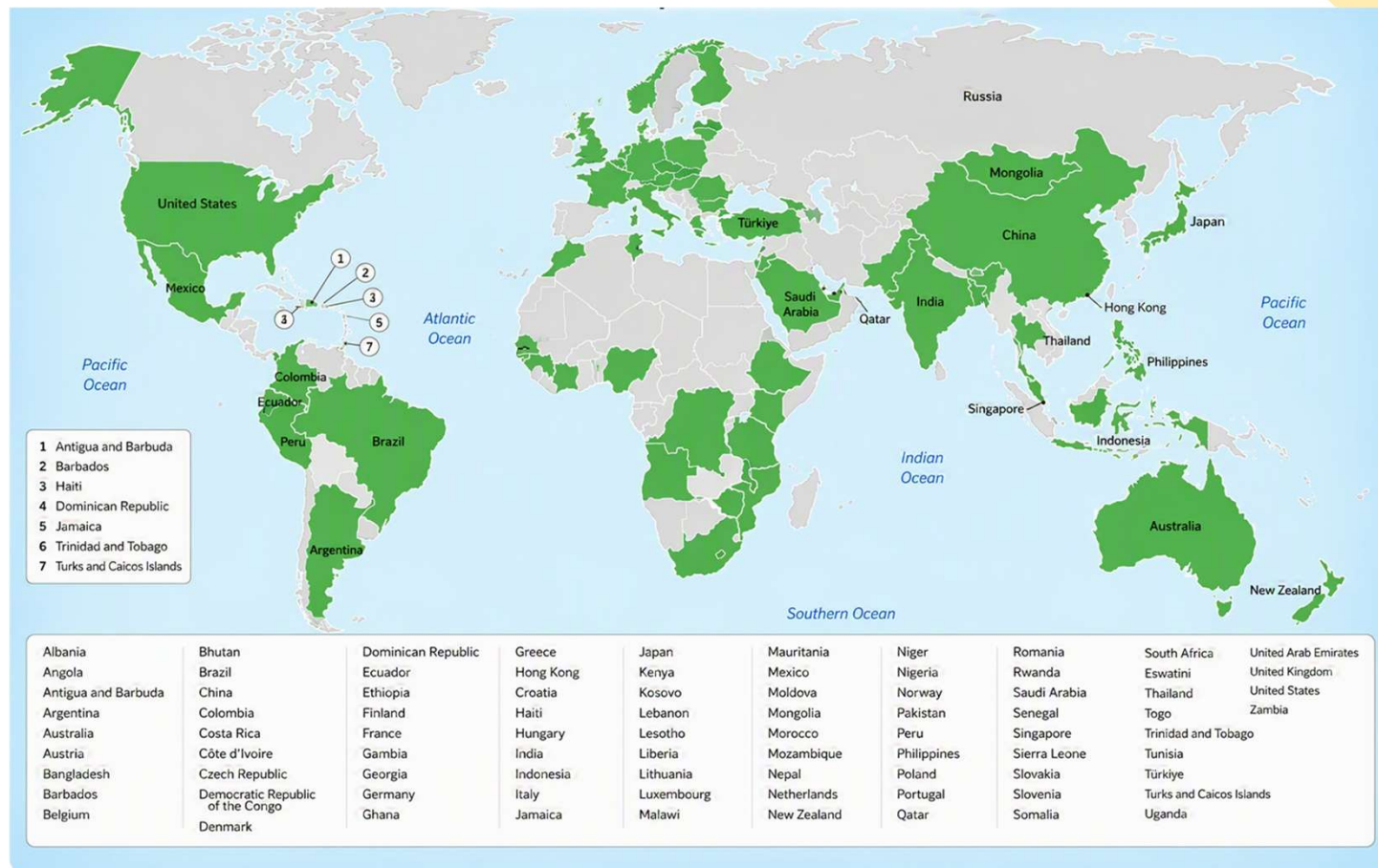
Welcome

Christopher Yukins (co-moderator)

**Lynn David Research Professor in Government Procurement Law
GW Law School – Government Procurement Law Program**

- **Recording will be available**
 - publicprocurementinternational.com
(with program materials)
 - *GW Law Government Procurement Law Program* YouTube page
- **Chat available**
- Speakers' statements are in their personal capacities





450+ registrants from 85 countries over six continents

Three Sessions

9 am ET- 15:00 CET

Monday, July 20

Introduction and Key Updates

Wednesday, July 22

Contracting in International Development

Friday, July 24

Anti-Corruption in International Development

Panelists



Benedetta Audia



Prabhat Garg



Benjamin Herisset



Jun Jin



Caroline Nicholas



Vinay Sharma



Jean-Jacques
Verdeaux



Sope Williams



Christopher Yukins



Co-Moderator Benedetta Audia

Benedetta Audia is the Principal of International Development LLC, a firm advising private sector companies in international development and business matters and providing counsel to multilateral organizations, non-governmental organizations and government entities.



International developments in anti- corruption law and enforcement

Professor Sope Williams



Overview

- Executive order on US Foreign Aid 20 January 2025
- Executive order on FCPA enforcement 10 February 2025
- New FCPA guidelines June 2025
- Consequences and implications
- International and domestic responses
- What has not changed



From Fighting Corruption to Designing Integrity

Prabhat Garg

Author: (forthcoming) *Demystifying International Public Procurement*

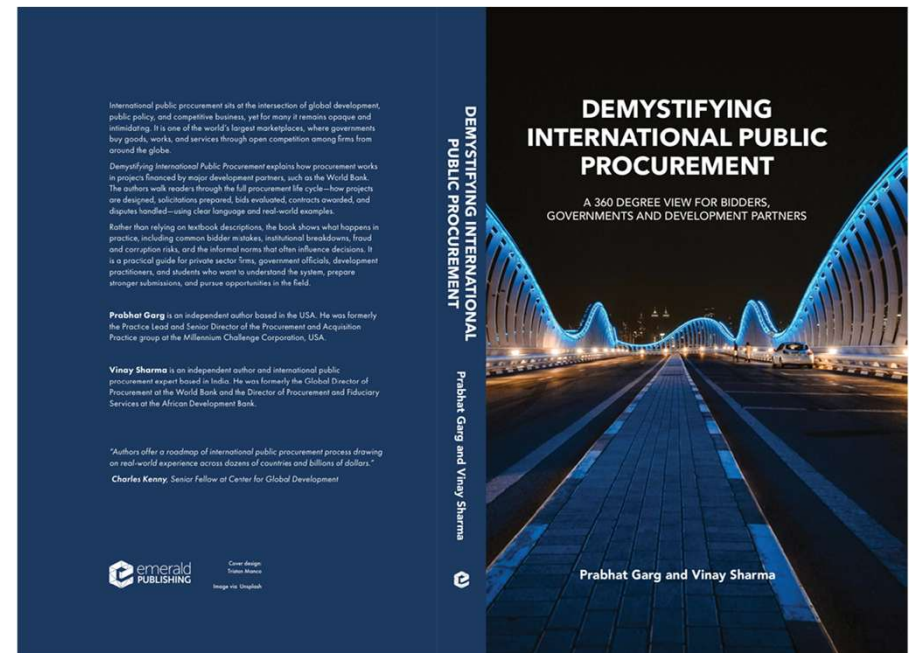
Former Senior Country Officer -- World Bank
Former Practice Lead and Senior Director -- Millennium Challenge Corporation (a US government foreign aid agency)

Forthcoming Book

Authors:

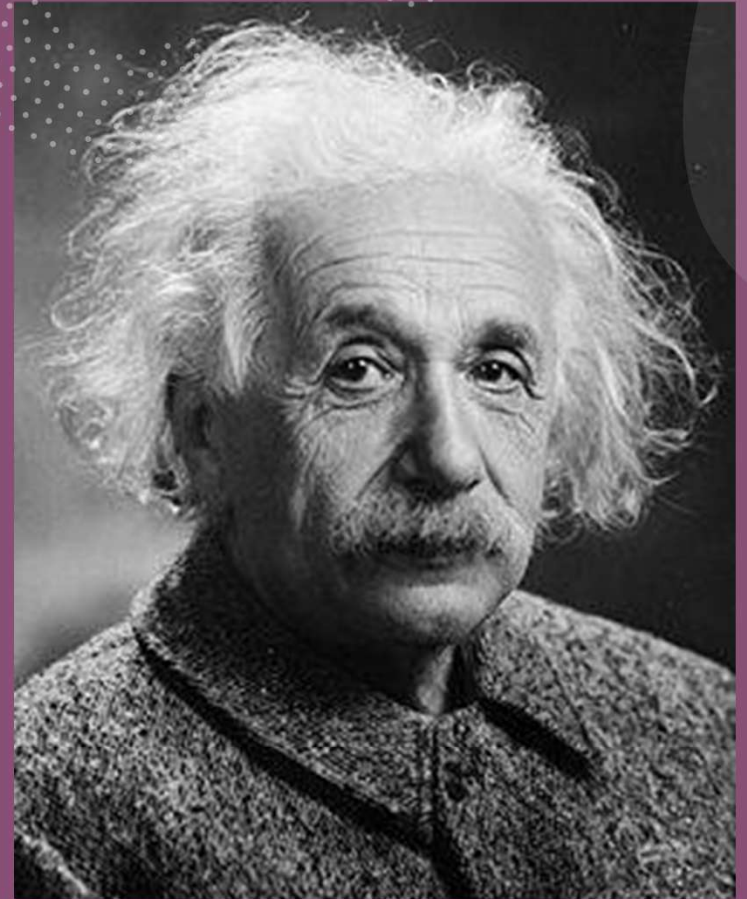
Prabhat Garg - prabhatgarg57@gmail.com

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Procurement is corrupt: the perception problem

- **Albert Einstein:** "So long as there are men, there will be wars":
 - **I would add to this: so long as there are men, there will be corruption**
- Some advocacy groups note that **up to 50%** money is lost to corruption in public procurement.
- In our experience, money lost to corruption under donor-funded procurements is **lower but not negligible**.
- **F&C risks will never be zero.**



Everyone knows procurement is corrupt: the perception problem

- All involved parties—the Buyers, the Bidders, and the Funding agencies—carry responsibility for reducing corruption and for delivering impactful development outcomes.



In our book, we demonstrate through real examples that F&C occurs across all parties:

- **Bidders:** winning the contract is the first step; therefore, influencing or manipulating the procurement process becomes a primary objective;
- **Buyers, the Governments:** opportunities to solicit or extract bribes by steering contracts and then by managing contracts to gain benefits.
- **Funding Agencies:** the authority to approve high-value procurement actions and contract deliverables—often far exceeding their own remuneration—creates incentives.

Strong oversight helps:
audit and inspection functions; independent integrity offices; protected whistle-blower lines, and clear procedures for handling allegations.

Real-life examples from our book: Buyer F&C

- Vehicle procurement in Central Africa, the specifications included snow tires despite the fact that it never snows there.
- Consulting procurement in Latin America, the TOR to replace a retiring government expert required experience and qualifications that only this person could meet.
- Software procurement in East Asia, request to Direct contract with an authorized dealer of a foreign company at \$30,000 cost estimate while the same software was available at less than \$1,000 all over the world.
- **The funding agency was able to detect and block these cases.**

Real-life examples from our book: Bidders' F&C

- F&C from bidders is pervasive and, in some markets, almost normalized. The spectrum includes:
 - Inflated or fabricated past performance;
 - Exaggerating roles on previous assignments;
 - Falsified CVs and degrees;
 - “Ghost” experts whose CVs are used without consent;
 - Forged, counterfeit, or collusively handled bid securities;
 - Attempts to bribe government and/or evaluation panels.

=> Corruption schemes are as numerous as the bidders themselves.

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- Real-life examples from our book:
Donor agency staff

- F&C is not common among donor staff due to strict oversight, but still exists:
 - Middle East water-well project: all looked good on paper; wells were constructed, inspected and approved, and invoices paid. In the end, not a single well existed—all money disappeared. Lack of proper supervision by the government and the funding agency.
 - Africa agriculture project: One funding agency staff collaborated with the government staff in siphoning money to his relatives in different countries.

=> These instances were caught through whistleblowers.

In Summary,

- Most effective integrity work is unglamorous. It consists of:
 - Procurement officers insisting on proper documentation;
 - Decision makers reading evaluation reports carefully, not just signing them;
 - Donor and government staff conducting site visits and informal cross-checks;
 - Evaluators taking conflict-of-interest declarations seriously;
 - Auditors sampling across both large and small contracts; and
 - The bidding community taking an “oath of integrity” seriously.

These everyday behaviors do not generate dramatic headlines, but they narrow the space in which serious F&C can thrive.

Prevention

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- **Real-life examples of F&C prevention measures from one Funding Agency:**

- Develop structured Anti-F&C risk registers for each country program.
- Ask program teams and country partners to:
 - “Put their fraudster hats on” and think creatively about how a determined bad-actor might manipulate specific processes;
 - Map out concrete risk scenarios across sectors and procurement stages;
 - Identify existing controls and their limitations;
 - Agree on additional mitigation measures;
 - Record all of this in a risk register, and keep this periodically updated.

Three Emerging Challenges

Beyond traditional bribery — the next decade's integrity frontiers.



Climate Finance

Greenwashing — false environmental claims obscuring procurement decisions



Digital Procurement

Cyber manipulation — systems compromise threatening bid integrity



AI Procurement

Algorithmic bias — opaque models embedding unfair advantage

Anti-Corruption Has Evolved

Traditional Focus

- Detect fraud
- Investigate
- Sanction
- Debar

Emerging Focus

- Prevent opportunities
- Increase transparency
- Improve competition
- Use technology
- Strengthen institutions



Competition Is the Strongest Anti-Corruption Tool

Reduces Discretion

Rules-based selection limits arbitrary decision-making

Exposes Inflated Prices

Market forces reveal unreasonable bids

Widens Participation

More bidders, more scrutiny, less collusion

Procurement is where governments convert public budgets into public delivery.



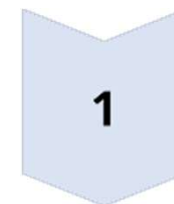


Artificial Intelligence in Reducing Corruption

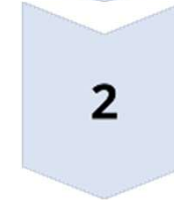
AI Identifies

- Unusual pricing patterns
- Supplier concentration
- Repeated change orders
- Collusive bidding patterns
- Conflicts of interest

A Fundamental Shift



**Random
Sampling**



**Continuous
Monitoring**

AI augments professionals — it does not replace them.

Integrity During Contract Management

Many losses occur **after award** — an area too often overlooked.



False Quantities

Billing for work not performed



Unnecessary Variations

Scope creep masking overpricing



Material Substitution

Inferior goods accepted without challenge



Supervision Collusion

Fraudulent progress certificates approved



Measuring Integrity

What does success look like?

Not This

- Number of investigations
- Number of sanctions
- Debarments issued

But This

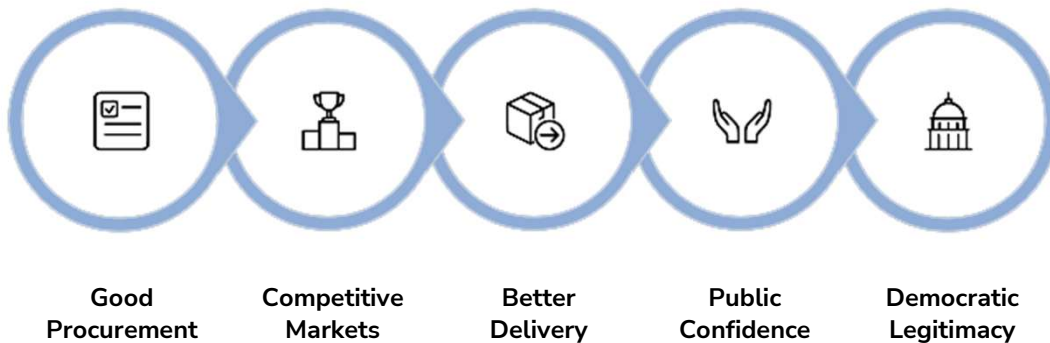
- More competition & first-time bidders
- Shorter procurement cycles
- Fewer complaints
- Better contract performance
- Greater public trust

 Integrity should be measured by healthier procurement markets.

Final Reflection:

So long there are men, there will be corruption.

Fraud and corruption have existed throughout history. The objective of modern procurement is not to eliminate them completely — but to reduce opportunities, increase the probability of detection, and ensure that integrity becomes the norm rather than the exception.



Forthcoming Book

International public procurement sits at the intersection of global development, public policy, and competitive business, yet for many it remains opaque and intimidating. It is one of the world's largest marketplaces, where governments buy goods, works, and services through open competition among firms from around the globe.

Demystifying International Public Procurement explains how procurement works in projects financed by major development partners, such as the World Bank. The authors walk readers through the full procurement life cycle—how projects are designed, solicitations prepared, bids evaluated, contracts awarded, and disputes handled—using clear language and real-world examples.

Rather than relying on textbook descriptions, the book shows what happens in practice, including common bidder mistakes, institutional breakdowns, fraud and corruption risks, and the informal norms that often influence decisions. It is a practical guide for private sector firms, government officials, development practitioners, and students who want to understand the system, prepare stronger submissions, and pursue opportunities in the field.

DEMYSTIFYING INTERNATIONAL
PUBLIC PROCUREMENT

DEMYSTIFYING INTERNATIONAL PUBLIC PROCUREMENT

A 360 DEGREE VIEW FOR BIDDERS,
GOVERNMENTS AND DEVELOPMENT PARTNERS

Prabhat Garg and Vinay Sharma

Book will be published in October

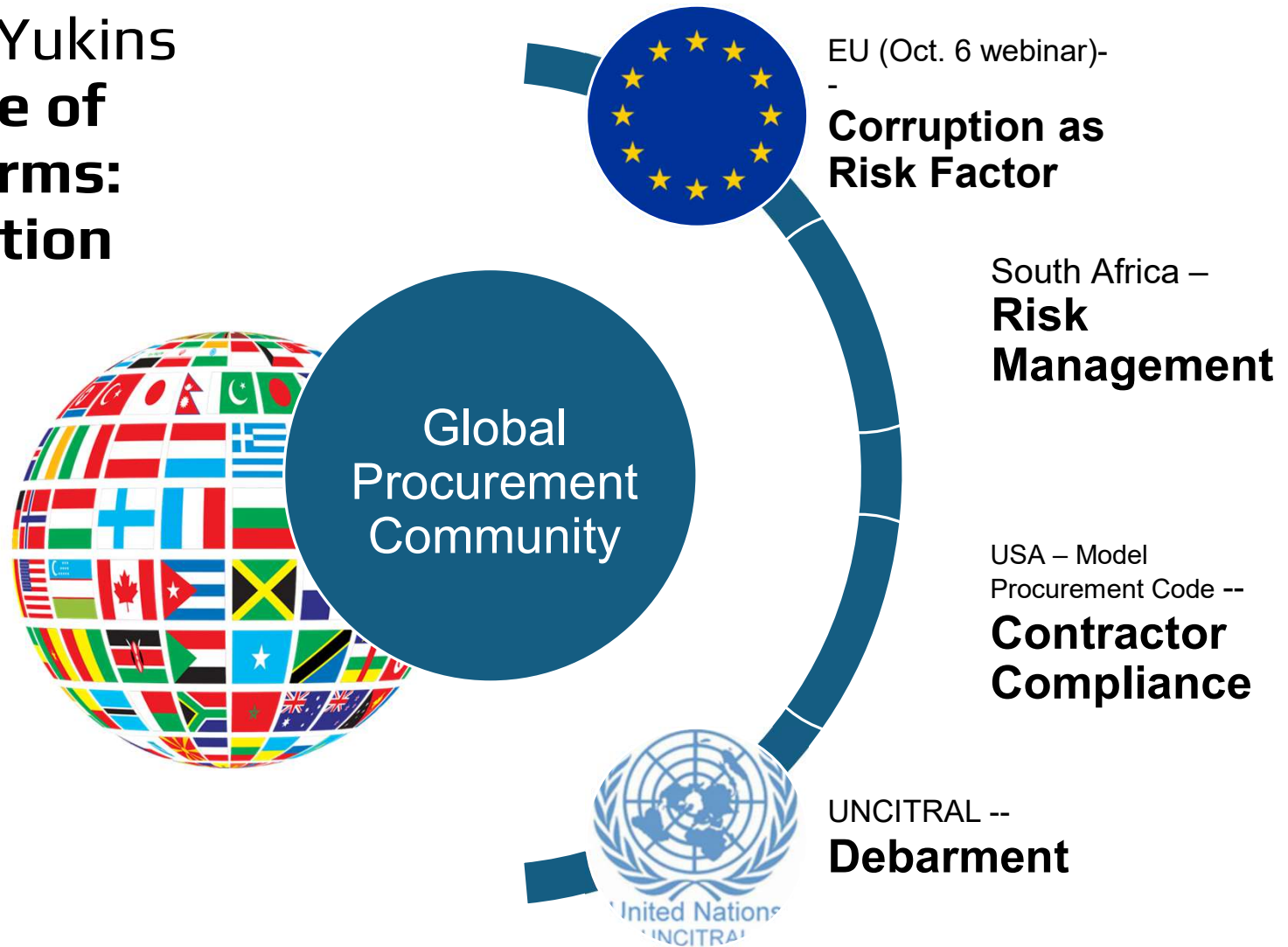
- Pre-order now at full-price, £80 (about \$107) through Amazon: [Demystifying International Public Procurement: A 360 Degree View for Bidders, Governments and Development Partners: Amazon.co.uk: Garg, Prabhat, Sharma, Vinay: 9781837420186: Books.](#)
- 30% discount to the participants of this webinar will be available in September. Please send a request to me at prabhatgarg57@gmail.com

Christopher Yukins

Convergence of Global Reforms: Anti-Corruption

OECD Public Governance Policy Papers

Managing risks in the
public procurement of
goods, services and
infrastructure



Questions and Discussion

Conclusion

Video recording of today's session will be available on GW Law – Government Procurement Law **YouTube Page** & **www.publicprocurementinternational.com**