PURPOSE OF TRAINING

- To equip our staff with the knowledge, values, policies and procedures in Diyokes Consultants Limited Integrity Compliance Programme (ICP) as well as the skills to be used to prevent, detect, investigate and remediate misconduct in our business operations. The ICP was developed with the assistance of the WBG ICO.

ADDRESSING THE MISCONDUCT THAT LED TO OUR COMPANY'S SANCTION BY THE WBG

Background and Project Context

- **Title: The NEWMAP Project & Abia State Engagement**
- **Project Overview:** The Nigeria Erosion and Watershed Management Project (NEWMAP) was a World Bank-assisted multi-sectoral program (2013–2022) aimed at addressing severe gully erosion and land degradation across 23 Nigerian states.

THE ENGAGEMENT:

- Diyokes Consultants Ltd (as Lead Partner of a JV) was contracted by the Abia State Project Management Unit (SPMU) in 2015 for "Engineering Design and Supervision of Works."

THE SANCTIONS CASE:

- Following a World Bank Sanctions Board hearing in December 2023, the firm and its Managing Director were debarred for a minimum of **1.5 years** due to **fraudulent practices**.

CORE ISSUES:

- Allegations involved misrepresenting the role of a JV partner, falsely confirming the availability of key staff, and unauthorized personnel replacement without notification.

COMMITMENT TO INTEGRITY COMPLIANCE

- **Immediate Mitigation Efforts & Engagement**
- **Active Cooperation:** The company is actively working with the World Bank Group Integrity Compliance Office (ICO) to meet all conditions for release from sanctions.

- **Resource Integration:** We have adopted the WBG Integrity Compliance Guidelines and utilized sample anti-corruption programs to overhaul our internal policies.

- **Transparency:** All requested corporate governance documents, including Financial Statements (2024), ESHS, Code of Conduct, and Articles of Association, have been submitted for review.

- **Policy Development:** A comprehensive **Integrity Compliance Program (ICP)** is currently being finalized, incorporating feedback from the ICO team to ensure global best practices.

CAPACITY BUILDING & PROFESSIONAL TRAINING

- **Leadership Training & Educational Milestones**
- **Certified Competency:** The Managing Director has successfully completed specialized integrity training through the World Bank's Open Learning Campus:
  - *Agents of Integrity* (Feb 2014)
  - *Agents of Integrity II: The Small Company Perspective* (Feb 2017)

- **Global Standards:** Completion of Transparency International UK's *"Doing Business without Bribery"* course (Feb 2019).
- **Knowledge Sharing:** The firm has integrated the WBG Integrity Compliance Knowledge Sharing Platform into its document library for continuous staff education.

- **Staff Readiness:** Draft training materials and plans on integrity compliance for both new and existing employees have been developed to ensure a company-wide culture of ethics.

Future Roadmap & Prevention of Recurrence

- **Strategic Ongoing Plans for Ethical Excellence**
- **Due Diligence & Selection:** Implementing rigorous vetting processes for all employees, sub-consultants, and Joint Venture partners to ensure technical and ethical alignment.

- **Operational Controls:** Establishing robust internal audits and **QA/QC processes** specifically designed to prevent data falsification or unauthorized personnel substitution.

- **Disclosure Protocols:** Commitment to 100% accuracy in MDB procurement disclosures and the implementation of strict document management and retention schedules.

- **Continuous Awareness:** Regular training cycles for new hires & existing staff referencing Nigerian Law (ICPC Act) and WBG Int. Compl. Guidelines to keep integrity at the forefront of our business operations.

- **Corporate Rebranding:** Utilizing the approved ICP to rebrand Diyokes Consultants Ltd as a leader in ethical engineering consultancy.