

Notice of Uncontested Sanctions Proceedings

SP efn6f-Stn6fntn66d.(JEMC 6EntnaJEMCe2sSP toSP0cocL3N3CO(1

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Respondent:
Ms. Gloria Beatriz Giraldo Laverde

1. On April 6, 2023, the World Bank's Chief Suspension and Debarment Offon

Gloria Beatriz Giraldo Laverde
(“Ms. Giraldo”)

Recommended Sanction: Debarment with Conditional Release
Minimum Period of Ineligibility of Two (2) Years and Four (4) Months

It is recommended that Ms. Giraldo, together with any entity that is an Affiliate directly or indirectly controlled by Ms. Giraldo, including but not limited to Inversiones Amber S.A.S., be declared ineligible (i) to be awarded or otherwise benefit from a Bank-financed contract, financially or in any other manner;¹ (ii) to be a nominated² sub-contractor, consultant, manufacturer or supplier, or service provider of a02 TdOBD1 (w)-3 (o ())3 (29.92 \$m)2 (anuf R3id to a8 (j(t)-/TT3 1 Tfp)i

(e.g., an integrity compliance program or elements thereof) to address the Sanctionable Practices.

In determining this recommended sanction, the SDO took into account, as aggravating factors, (i) Ms. Giraldo's repeated pattern of collusive practices and (ii) Ms. Giraldo's central role in the misconduct. Additionally, the SDO also considered, as mitigating factors, (i) INT's representations as to the extent of Ms. Giraldo's cooperation during the course of the investigation, noting in particular that Ms. Giraldo agreed to meet with INT and provided certain documents to INT; (ii) Ms. Giraldo's participation in limited integrity compliance training; (iii) Ms. Giraldo's voluntarily restraint from participating in Bank-financed projects since December 2020; and (iv) the passage of time since Ms. Giraldo's misconduct and the Bank became aware of it. The SDO did not apply any additional aggravating or mitigating factors.

This declaration of ineligibility will extend across the operations of the World Bank Group, including IFC, MIGA, and the guarantee and carbon finance operations of the Bank.³ The Bank will also provide notice of this declaration of ineligibility to the other multilateral development banks ("MDBs") that are party to the Agreement for Mutual Enforcement of Debarment Decisions (the "MDB Cross-Debarment Agreement") so that they may determine whether to enforce the declarations of ineligibility with respect to their own operations in accordance with the MDB Cross-Debarment Agreement and their own policies and procedures.⁴

5. In accordance with sub-paragraph 4.02(b) of Section III.A of the Sanctions Procedures, the Respondent submitted a written Explanation (as defined in the Sanctions Procedures). After consideration of the arguments and evidence presented by INT in the SAE appended to the Notice and the arguments and evidence presented in the Respondent's Explanation, the SDO determined that there was no basis for (i) a withdrawal of the Notice pursuant to sub-paragraph

³ *Sanctions Procedures, . . . sub-paragraph 9.01(c) of Section III.A. For the avoidance of doubt, the declaration of ineligibility also extends to activities financed through trust funds administered by the Bank to the extent governed by the Bank's Procurement Regulations (or either of the Regulations' predecessor documents, the Procurement Guidelines and Consultant Guidelines) or Anti-Corruption Guidelines. Id., sub-paragraph 1.01(c)(i) of Section III.A.*

⁴ *At present, the parties to the MDB Cross-Debarment Agreement are the Bank Group, the African Development Bank Group, the Asian Development Bank, the European Bank for Reconstruction and Development, and the Inter-American Development Bank Group. The MDB Cross-Debarment Agreement provides that, subject to the prerequisite conditions set forth in the MDB Cross-Debarment Agreement, unless a participating MDB*

4.03(a)(i) of Section III.A of the Sanctions Procedures; or (ii) a revision of the recommended sanction pursuant to sub-paragraph 4.03(a)(ii) of Section III.A of the Sanctions Procedures

6. Sub-paragraph 4.04 of Section III.A of the Sanctions Procedures provides that if a respondent does not contest the accusation or the sanction recommended by the SDO in a Notice of Sanctions Proceedings by submitting a Response (as defined in the Sanctions Procedures) to the World Bank Group Sanctions Board (the “Sanctions Board”) within ninety (90) days after delivery of such Notice of Sanctions Proceedings, the sanction recommended by the SDO shall enter immediately into force.
7. No Response having been submitted to the Sanctions Board by the Respondent within the specified period, INT’s accusation in the SAE and the sanction recommended by the SDO in the Notice are deemed uncontested for purposes of sub-paragraph 4.04 of Section III.A of the Sanctions Procedures, and the recommended sanction set forth in paragraph 4 above has entered into force as of July 20, 2023.

