

find it appropriate to cap any ineligibility at six months or less. In particular, the Sanctions Board declines to consider the outcome of INT's settlement with the First JV Partner as a benchmark. As INT asserts, the First JV Partner's settlement and resulting debarment arose from an unrelated case. More generally, the Sanctions Board has declined to consider the sanctions agreed between settling parties to bear upon its own determination of contested sanctions for respondents, as the final sanctions in settlements may be shaped by considerations extrinsic to the sanctioned party's relative culpability or responsibility for misconduct.³²

D. Determination of Liability and Appropriate Sanction

54. Considering the full record and all the factors discussed above, the Sanctions Board determines that the Respondent, together with any entity that is an Affiliate directly or indirectly controlled by the Respondent, shall be, and hereby declares that it is, ineligible to (i) be awarded or otherwise benefit from a Bank-financed contract, financially or in any other manner; (ii) be a nominated sub-contractor, consultant, manufacturer or supplier, or service provider of an otherwise eligible firm being awarded a Bank-financed contract; and (iii) receive the proceeds of any loan made by the Bank or otherwise participate further in the preparation or implementation of any Bank-Financed Project, provided, however, that after a minimum period of ineligibility of two (2) years and six (6) months beginning on the date of this decision, the Respondent may be released from ineligibility only if it has, in accordance with Section 9.03 of the Sanctions Procedures, adopted and implemented an effective integrity compliance program in a manner satisfactory to the World Bank Group. This ineligibility shall extend across the operations of the World Bank Group. This sanction is imposed on the Respondent for a corrupt practice as defined in Paragraph 1.15(a)(i) of the January 1999 Procurement Guidelines.

³² See Sanctions Board Decision No. 56 (2012) at para. 83 (declining to consider the outcome of a settlement with a JV partner as a benchmark).

