



May 2023

# WORLD BANK

## Borrower Countries' Contracts to Businesses in the U.S. and to Entities Potentially on U.S. Sanctions or Other Lists of Concern

# GAO Highlights

Highlights of [GAO-23-105543](#), a report to congressional requesters

## Why GAO Did This Study

The United States is one of the largest contributors to the World Bank. The World Bank provides financing to low- and middle-income countries for a number of purposes such as for infrastructure and social and economic development projects. World Bank borrowers are responsible for managing projects in line with the World Bank's policies. The World Bank requires borrowers to use competitive procurement processes to award contracts for project implementation. Treasury leads U.S. engagement with and has oversight responsibility for the World Bank, and Treasury officials are stationed in the Office of the U.S. Executive Director, which represents U.S. priorities and concerns on the World Bank's board.

GAO was asked to review World Bank borrowers' contract awards. This report examines (1) the extent to which World Bank borrowers awarded contracts to businesses in the U.S. in comparison to businesses in other countries; and (2) the extent to which World Bank borrowers awarded contracts to entities that may have been on selected U.S. sanctions or other lists of parties of concern, and what actions, if any, Treasury took in response.

GAO analyzed World Bank data on borrower contract awards from World Bank FYs 2013 through 2022. GAO compared contract awardees from calendar years 2017 through 2021 against individuals and entities on selected U.S. sanctions and other lists of parties of concern. GAO also performed detailed reviews of records identified as part of the analysis. GAO interviewed World Bank and U.S. agency officials to understand the availability and limitations of their data.

View [GAO-23-105543](#). For more information, contact Latesha Love-Grayer at (202) 512-4409 or [LoveGrayerL@gao.gov](mailto:LoveGrayerL@gao.gov).

May 2023

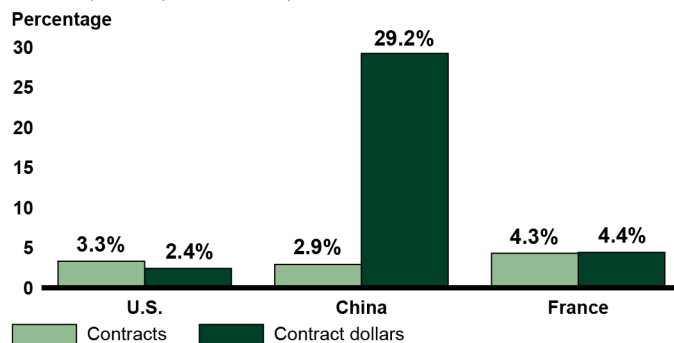
## WORLD BANK

### Borrower Countries' Contracts to Businesses in the U.S. and to Entities Potentially on U.S. Sanctions or Other Lists of Concern

## What GAO Found

World Bank data indicate that businesses in the U.S. were awarded a relatively small share of contract dollars, but were often successful when bidding. According to World Bank data, from World Bank fiscal years (FY) 2013 through 2022, borrower countries awarded on average around 21,000 contracts valued at \$15 billion per year to domestic and international businesses. Of those contracts awarded to international businesses, businesses in the U.S. were awarded the second-highest number of contracts (about 3 percent), but the ninth-highest contract dollars (about 2 percent). Businesses in China were awarded the third-highest number of international contracts (about 3 percent), but the most contract dollars (about 29 percent), as shown in the figure. Businesses in the U.S. bid on few contracts, but won about 70 percent of contracts when they bid, according to GAO's analysis of World Bank summary data from FY 2017 to October 2022.

**Figure: Percentage of World Bank Borrower International Contract Awards to Businesses in the U.S., China, and France, Fiscal Years 2013-2022**



Source: GAO analysis of World Bank data (as of 11/1/2022). | GAO-23-105543

Notes: The World Bank's fiscal year begins July 1st. The number and dollar amount of contracts awarded to businesses in the U.S. and other countries may be over or underestimated due to limitations in the World Bank's data. For example, borrowers identify contract awardees based on the country of business registration, which may not take into account beneficial ownership or other considerations that may affect determinations of nationality and ownership. The data also include contracts awarded to multilateral organizations such as the United Nations.

GAO's analysis found that from calendar years 2017 through 2021, World Bank borrowers awarded 28 contracts to entities that may have been on selected U.S. sanctions and other lists of parties of concern, such as export control lists. These 28 contracts—worth around \$76 million—were out of approximately 150,000 contracts worth around \$80 billion that GAO reviewed in its analysis covering the period. World Bank officials told us that all entities from all countries are eligible to bid for borrower contracts, except for certain entities debarred by the World Bank or sanctioned by the United Nations. Those officials also told us that the World Bank screens contract awardees against some U.S. sanctions lists and that it could confirm only six of the 28 contracts were awarded to entities on U.S. lists. Department of the Treasury (Treasury) officials told us that Treasury is not responsible for monitoring individual borrower contract awards, which occur after the World Bank board approves a project.

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## Abbreviations

AKA	also known as
API	Application Programming Interface
BIS	Bureau of Industry and Security
Commerce	Department of Commerce
Covered List	List of Equipment and Services Covered by Section 2 of the Secure Networks Act
FY	fiscal year
IPF	Investment Project Financing
MCA	Major Contract Awards
MEU List	Military End-User List
Non-SDN List	Consolidated Sanctions List
OFAC	Office of Foreign Assets Control
SDN List	Specially Designated Nationals and Blocked Persons List
STEP	Systematic Tracking of Exchanges in Procurement
Treasury	Department of the Treasury

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May 10, 2023

The Honorable Bill Hagerty  
Ranking Member  
Subcommittee on National Security and International Trade and Finance  
Committee on Banking, Housing, and Urban Affairs  
United States Senate

The Honorable Tom Cotton  
United States Senate

The Honorable Chuck Grassley  
United States Senate

The World Bank lends money and provides financial assistance to low- and middle-income countries for development projects aimed to reduce poverty.<sup>1</sup> In World Bank fiscal year (FY) 2022, the World Bank committed approximately \$71 billion to projects in more than 100 countries.<sup>2</sup> The World Bank requires borrower countries to use competitive procurement processes to award contracts to businesses to implement these World Bank-financed projects.<sup>3</sup> The U.S. is the largest shareholder in the World Bank and one of the largest contributing members. Congress has raised questions about the number of World Bank-financed contracts awarded by borrowers to businesses in the U.S.

World Bank borrower contracts may raise national security or foreign policy concerns for the U.S. For example, a World Bank borrower proposed awarding a contract to an entity that the Department of

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<sup>1</sup>The World Bank Group includes five institutions that carry out its mission to reduce poverty, increase shared prosperity, and promote sustainable development. These institutions include the International Development Association and the International Bank for Reconstruction and Development, which are known together as the World Bank. The other three institutions are the International Finance Corporation, the Multilateral Investment Guarantee Agency, and the International Centre for Settlement of Investment Disputes. This report focuses on the World Bank, rather than the World Bank Group more broadly.

<sup>2</sup>The World Bank's fiscal year begins July 1st. All references to fiscal years in this report are World Bank fiscal years, unless otherwise noted.

<sup>3</sup>Contracts may be awarded to both companies and individuals. In this report, we refer to companies and individuals collectively as businesses.

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Commerce (Commerce) determined posed a significant risk of involvement in activities contrary to the national security or foreign policy interests of the U.S. Specifically, as part of a World Bank-financed project, the Chinese telecommunications company Huawei Marine had the leading bid in a competition to lay an undersea cable that would connect Kiribati and the Federated States of Micronesia to a sensitive undersea cable used by the U.S. government and Guam. Commerce's Bureau of Industry and Security had previously listed Huawei Marine on the Entity List for posing a significant risk of involvement in activities contrary to the national security or foreign policy interests of the U.S.<sup>4</sup> In 2021, according to World Bank documentation, the Federated States of Micronesia canceled the procurement. Later, the State Department, in conjunction with the governments of Australia and Japan, announced its commitment to fund an undersea cable in the same region.

To identify entities that may pose national security or foreign policy risks, a number of U.S. agencies maintain sanctions lists and other lists of parties of concern to the U.S. government. These agencies include Commerce's Bureau of Industry and Security and the Department of the Treasury's (Treasury) Office of Foreign Assets Control. According to World Bank officials, neither the World Bank nor borrowers are prohibited from awarding contracts to entities on U.S. sanctions or other lists of parties of concern. However, the World Bank prohibits borrowers from awarding contracts to certain entities debarred by the World Bank or other multilateral development banks.<sup>5</sup>

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<sup>4</sup>According to financial news sources, at the time of the bid, Huawei Marine had recently divested from Huawei Technologies Ltd. and became majority owned by another Chinese firm. Huawei Technologies Ltd. was added to the Entity List in 2019. The Entity List identifies persons reasonably believed to be involved, or to pose a significant risk of being or becoming involved, in activities contrary to the national security or foreign policy interests of the U.S. 15 C.F.R. § 744.16. It includes names of certain foreign entities that are subject to specific license requirements for the export, reexport and/or transfer (in-country) of specified items. The entities on the Entity List are subject to licensing requirements and policies supplemental to those found elsewhere in the Export Administration Regulations. 15 C.F.R. Part 744, Supp. No. 4.

<sup>5</sup>The World Bank Group's Integrity Vice Presidency investigates allegations that an entity may have engaged in fraud, corruption, coercion, collusion or obstruction in connection with World Bank-financed projects. Under the World Bank's Sanctions System, based upon the results of an investigation conducted by the Integrity Vice Presidency, an entity may be temporarily suspended or debarred permanently among other administrative actions. According to the World Bank, only entities suspended or debarred by the World Bank or those subject to United Nations sanctions are ineligible to bid for World Bank-financed contracts. All other entities from all countries are eligible to bid.

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You asked us to review World Bank borrower contract awards to businesses in the U.S. and whether World Bank borrowers were awarding contracts to entities that potentially posed national and economic security risks to the U.S. This report examines: (1) the extent to which World Bank borrowers awarded contracts to businesses in the U.S. in comparison to businesses in other countries and (2) the extent to which World Bank borrowers awarded contracts to entities that may have been on selected U.S. sanctions or other lists of parties of concern, and what actions, if any, Treasury took in response.

To determine the extent to which World Bank borrowers awarded contracts to businesses in the U.S. in comparison to businesses in other countries, we analyzed World Bank borrower contract award data for FYs 2013 through 2022. We reviewed World Bank documentation and interviewed World Bank officials to understand how the World Bank captures and reports on borrower contract award data, including how it accounts for and addresses limitations in the data.<sup>6</sup> We subsequently analyzed the data using a number of variables, including the borrower country, country of contract awardee, number and amount of the awarded contract, and the procurement category.<sup>7</sup> We performed both manual and programmatic checks of the data to identify obvious errors and inconsistencies and discussed our findings with World Bank officials. We determined that, while there were errors in the borrower contract award data, they were sufficiently reliable for summarizing data on World Bank borrower contract awards and comparing World Bank borrower contract

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<sup>6</sup>The World Bank publishes two datasets on borrower contract awards. The Major Contract Awards dataset covers FYs up to 2016 and includes contracts that required additional World Bank review and approval, a process known as prior review. The Contract Awards in Investment Project Financing dataset covers FYs 2017 onward. The World Bank began collecting information on all contract awards beginning in FY 2017. During the course of our review, the World Bank changed the name of the Major Contract Awards dataset to Contract Awards in Investment Project Financing (since FY2001 – FY 2016). We refer to the dataset as Major Contract Awards to differentiate it from the Contract Awards in Investment Project Financing dataset that includes FYs 2017 onward.

<sup>7</sup>The World Bank reports on four procurement categories: civil works, goods, consultant services, and non-consulting services. The civil works category includes the construction and repair of structures, such as projects for road construction and transportation, infrastructure, waste management, and water system repair. The goods category includes the purchase of items, such as raw materials and machinery. The consultant services category includes advisory and professional services, such as financial advisory services and drafting sector policies. The non-consulting services category includes services that are normally bid and contracted on the basis of performance of measurable outputs and for which performance standards can be clearly identified and consistently applied, such as drilling or aerial photography.



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awardees against the names of entities on selected U.S. sanctions or other lists of parties of concern.<sup>8</sup>

To determine the extent to which World Bank borrowers awarded contracts to entities that may have been on selected U.S. sanctions or other lists of parties of concern, and what actions, if any, Treasury took in response, we took a number of steps. We compared the names and countries of registration of World Bank borrower contract awardees against the names and countries of entities on selected U.S. sanctions and other lists of parties of concern using both programmatic and manual reviews.<sup>9</sup> Where the programmatic review identified a potential name and country match, we manually reviewed the results to determine if the match was potentially valid and whether the potential match was awarded a contract while it was on a selected U.S. sanctions or other list of parties of concern. Our analysis identified some potential matches. We could not confirm that the contract awardees were the same entities identified on selected U.S. lists because additional identifying information needed to make a positive identification—such as beneficial ownership information, addresses, national documentation numbers, or dates of birth—is not included in the World Bank’s public data on borrower contract awards. We provided the results of our analysis to Treasury, Commerce, and the World Bank, and incorporated their responses in our report. We also discussed our findings with Treasury, Commerce, and the World Bank to determine whether they were aware of these awards and to identify any additional information or explanations that we should consider. See Appendix I for additional information on our scope and methodology.

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<sup>8</sup>In response to our identification of errors in the data, the World Bank also made corrections to its reporting of the data during the course of our review.

<sup>9</sup>For this analysis, we selected the following lists: (1) Commerce Bureau of Industry and Security (a) Entity List, (b) Military End User List, and (c) Unverified List; (2) Treasury Office of Foreign Assets Control (a) Specially Designated Nationals and Blocked Persons (SDN) List and (b) Consolidated Sanctions (non-SDN) List; (3) Federal Communications Commission List of Equipment and Services Covered by Section 2 of the Secure Networks Act (Covered List); and (4) General Services Administration System for Award Management Exclusions List. The Federal Communication Commission’s Covered List is a list of equipment and services produced by specific entities, and our analysis of that list focused on those entities’ names. We selected these lists based on whether the information they contained was (1) publicly available; (2) related to U.S. national security or foreign policy interests; (3) related to commercial, subnational entities such as individuals and businesses; and (4) whether there were any significant limitations to the data, such as availability. We limited our scope for this analysis to calendar years 2017 to 2021.

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We conducted this performance audit from November 2021 to May 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### World Bank Project Financing

The World Bank's main financing instrument for procurement is Investment Project Financing (IPF), which funds projects in sectors such as transportation, health, and information and communications technologies, among others. Under IPF, the borrower implements the project, executes procurement, and awards contracts in accordance with the World Bank's procurement policy and regulations.<sup>10</sup> In FY 2022, borrowers reported awarding around \$17.5 billion in IPF contract dollars.<sup>11</sup>

### World Bank Procurement Framework

The World Bank began implementing its current procurement framework in FY 2017. The framework provides detailed guidance for borrowers to execute procurement for IPF projects.<sup>12</sup> Under the procurement framework, the World Bank provides financing to borrowers, and borrowers carry out procurement for the project based on the criteria defined in bidding documents. The World Bank oversees the procurement to ensure that borrowers are complying with the framework.

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<sup>10</sup>According to World Bank officials, funds for IPF projects can also be used for project operating costs. The World Bank's other financial instruments are Development Policy Financing, which supports policy and institutional reforms, and Program-for-Results, which links disbursement of funds to project goals.

<sup>11</sup>The World Bank also directly awards contracts for goods, works, and services to support its own operations. This is known as corporate procurement. This report focuses on procurement implemented by World Bank borrowers as a part of World Bank-financed IPF projects.

<sup>12</sup>The Procurement Framework was preceded by the procurement guidelines, which had similar goals, but provided less flexibility to borrowers. According to World Bank officials, the procurement framework constitutes best practice among International Financial Institutions and comprises principles-based procurement policy and regulations that balance the risks of the borrower and contractors.

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The type of procurement approach available to borrowers depends on the contract value, but borrowers have a number of flexibilities in how to implement procurement based on World Bank thresholds.<sup>13</sup> For example, the World Bank's procurement framework generally encourages borrowers to seek international competition for awards, but in some instances, borrowers may apply their own open competitive national procurement procedures subject to standards defined by the World Bank. In addition, where international competitive procurement is used, a borrower may apply a preference for domestic businesses when evaluating bids subject to World Bank regulations and thresholds.<sup>14</sup>

The World Bank requires borrowers to record procurement information, including contract awards, in its information management system, Systematic Tracking of Exchanges in Procurement (STEP). Prior to STEP, the World Bank only collected data about contract awards that required additional World Bank review and approval, a process known as prior review.<sup>15</sup> The World Bank introduced STEP in FY 2016 as part of reforms that culminated in the new procurement framework. Under the new framework, the World Bank began collecting additional data from borrowers in FY 2017. According to World Bank officials, the World Bank transitioned borrowers to STEP between FYs 2017 and 2018, and,

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<sup>13</sup>The thresholds vary by country and procurement type. The World Bank sets thresholds for borrowers based on a number of factors, including country-specific market conditions and the complexity and risk of certain industries. See World Bank, *Thresholds for Procurement Approaches and Methods by Country*, OPSPF5.05-GUID.148 (Washington, D.C., Aug. 2016).

<sup>14</sup>World Bank borrowers, in specific instances, may apply a preference for domestic businesses, in line with specific regulations and formulas provided by the World Bank. See World Bank, *Procurement Regulations for IPF Borrowers Fourth Edition* (Washington, D.C.: Nov. 2020). For example, according to the World Bank, for international competitive procurements, a borrower may apply a margin of domestic preference of 15 percent for domestically manufactured goods. In addition, borrowers from countries below a specified threshold of per capita gross national income, that is set annually by the World Bank, may apply a margin of domestic preference of 7.5 percent when evaluating bids. According to the World Bank, where a borrower applies its own national procurement procedures, the borrower must still follow the World Bank principle of allowing all entities from all countries eligible to bid for World Bank-financed contracts except for those suspended or debarred from the World Bank or on United Nations sanctions lists.

<sup>15</sup>Contracts subject to prior review are those that exceeded a certain dollar amount threshold based on the type of procurement, the procurement activity, and the risk assessed by the World Bank. The thresholds may be lower for specific countries, sectors, or projects.

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beginning in FY 2019, borrowers were required to record all contract awards in STEP.

Borrowers are required to enter a range of details about contract awards into STEP, including the name and country of registration of the awardee. According to World Bank documentation, borrowers are not required to report on awards to subcontractors. According to World Bank officials, World Bank staff conduct quality assurance checks on the data entered by borrowers but do not manage the data in STEP.

The World Bank may declare entities as ineligible to participate in World Bank-financed contracts.<sup>16</sup> According to World Bank officials, the World Bank requires borrowers to screen bidders and contract awardees to determine whether they are eligible to participate in and be awarded World Bank-financed contracts. World Bank officials also told us that borrowers must follow the World Bank principle of allowing all entities from all countries eligible to bid for World Bank-financed contracts except for those suspended or debarred from the World Bank or on United Nations sanctions lists. Additionally, according to World Bank officials, the World Bank screens contract award recommendations by borrowers through its Anti-Money Laundering and Countering Financing of Terrorism and Sanction Screening Procedure.<sup>17</sup> Using this procedure, the World

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<sup>16</sup>According to World Bank documentation, the World Bank prohibits borrowers from awarding contracts to certain entities debarred by the World Bank or other multilateral development banks. Additionally, according to World Bank officials, the World Bank prohibits borrowers from awarding contracts to entities subject to United Nations sanctions.

<sup>17</sup>According to World Bank officials, the World Bank's Anti-Money Laundering and Countering Financing of Terrorism policies and procedures include screening against Treasury Office of Foreign Assets Control Specially Designated Nationals and Blocked Persons List and Consolidated Sanctions List as well as United Kingdom and European Union sanctions lists. This screening derives from practical concerns because the majority of World Bank payments flow through the U.S., United Kingdom, and European Union banks. However, according to World Bank officials, the World Bank's Articles of Agreement do not allow it to use national screening lists to determine eligibility to participate in World Bank-financed contracts since its Articles of Agreement require that all decisions be based solely on economic considerations. However, if the World Bank identifies an award recommendation to an entity that is on a sanctions list used in the World Bank's screening, the World Bank informs the borrower that 1) the World Bank is not able to issue a direct payment (on behalf of the borrower) to a potential awardee, and 2) the borrower may not be able to process the payment themselves. The borrower may make arrangements to pay the contract awardee. If the borrower cannot make arrangements, the borrower may request to revise its recommendation for the contract award and award the contract to the next-ranked bidder.

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Bank also screens all payments it makes including direct payments to a third party at the request of the borrower. However, World Bank officials told us that according to its Articles of Agreement, the World Bank is not subject to sanctions imposed under its member countries' laws and regulations.

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## U.S. Government Activities with the World Bank

Treasury's Office of International Affairs leads U.S. engagement with and has oversight responsibility for all multilateral development banks, including the World Bank. Treasury is the lead representative of the U.S. to the World Bank and the U.S. Executive Director represents U.S. priorities and concerns on the World Bank's board. Treasury officials are also stationed at the World Bank in the Office of the U.S. Executive Director. Treasury's Office of International Affairs also leads the Working Group on Multilateral Assistance, which reviews the policy implications of proposed World Bank projects and makes recommendations to the U.S. Executive Director to support or oppose those projects. Commerce's International Trade Administration also has a key role in U.S. and multilateral development bank relations, such as acting as a liaison for businesses in the U.S. that compete for World Bank borrowers' contracts and implementing relevant statutory requirements.<sup>18</sup>

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## Businesses in the U.S. Were Awarded a Small Share of Contract Dollars, but Were Often Successful When Bidding

From FYs 2013 through 2022, World Bank borrowers awarded an average of around \$15 billion in contract dollars per year. Businesses in the U.S. were awarded around one percent of total contract dollars during this period, and our analysis of World Bank summary data shows that businesses in the U.S. bid on about one percent of all World Bank-financed projects.<sup>19</sup> When businesses in the U.S. submitted bids, they were awarded contracts about 70 percent of the time, according to our analysis of World Bank summary data. Limitations to the World Bank's borrower contract award data, such as lack of beneficial ownership and subcontractor information, present challenges to fully understanding how often businesses in the U.S. compete for and are awarded borrower contracts.

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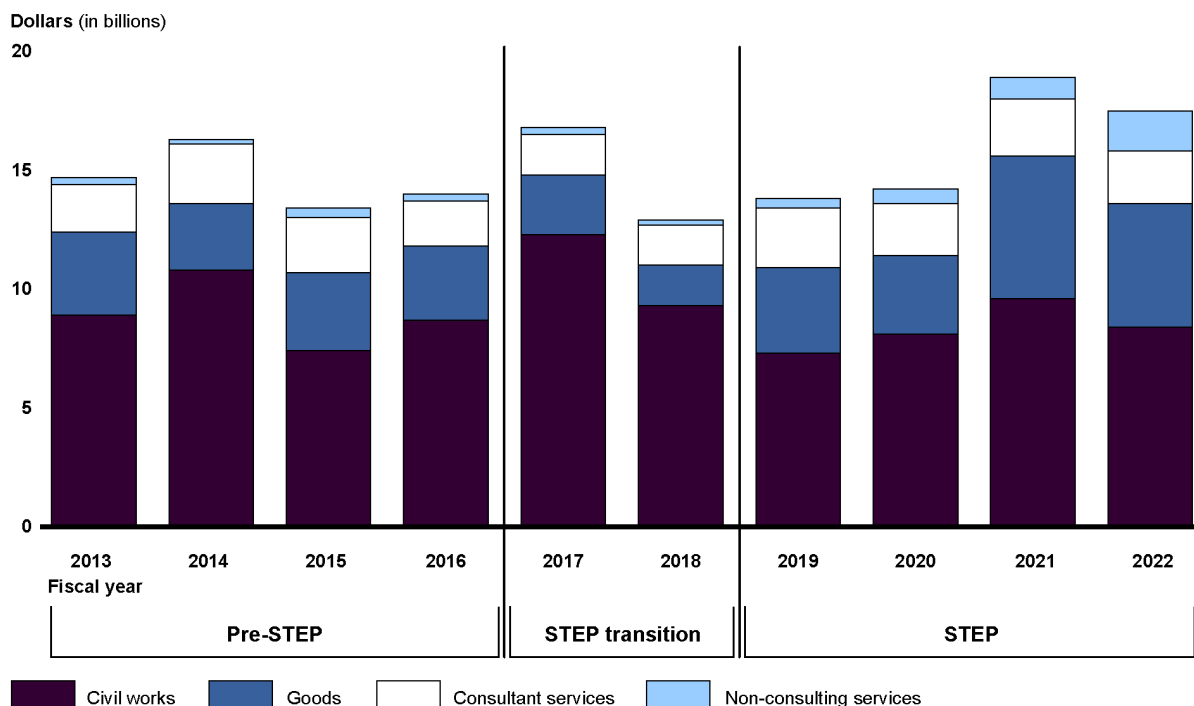
<sup>18</sup>22 U.S.C. § 262s-2.

<sup>19</sup>Throughout this report, we use the term "businesses in the U.S." to refer to businesses registered within the U.S., and "businesses in other countries" to refer to businesses registered in countries other than the U.S., as reported in World Bank data. According to the World Bank, the country of supplier registration reported in the World Bank data is the country where the supplier is incorporated, which may or may not reflect the actual country or countries of beneficial ownership.

## World Bank Borrowers Awarded an Average of Around \$15 Billion in Contract Dollars per Year from 2013 through 2022

From FYs 2013 through 2022, World Bank borrowers awarded an average of around \$15 billion per year in contract dollars to implement World Bank-financed projects. In general, in FYs 2013 through 2022, the majority of the total contract dollars each year was for civil works contracts, as shown in figure 1.

**Figure 1: World Bank Borrower-Awarded Contract Dollars by Procurement Category, FYs 2013-2022**



Legend: Systematic Tracking of Exchanges in Procurement = STEP.

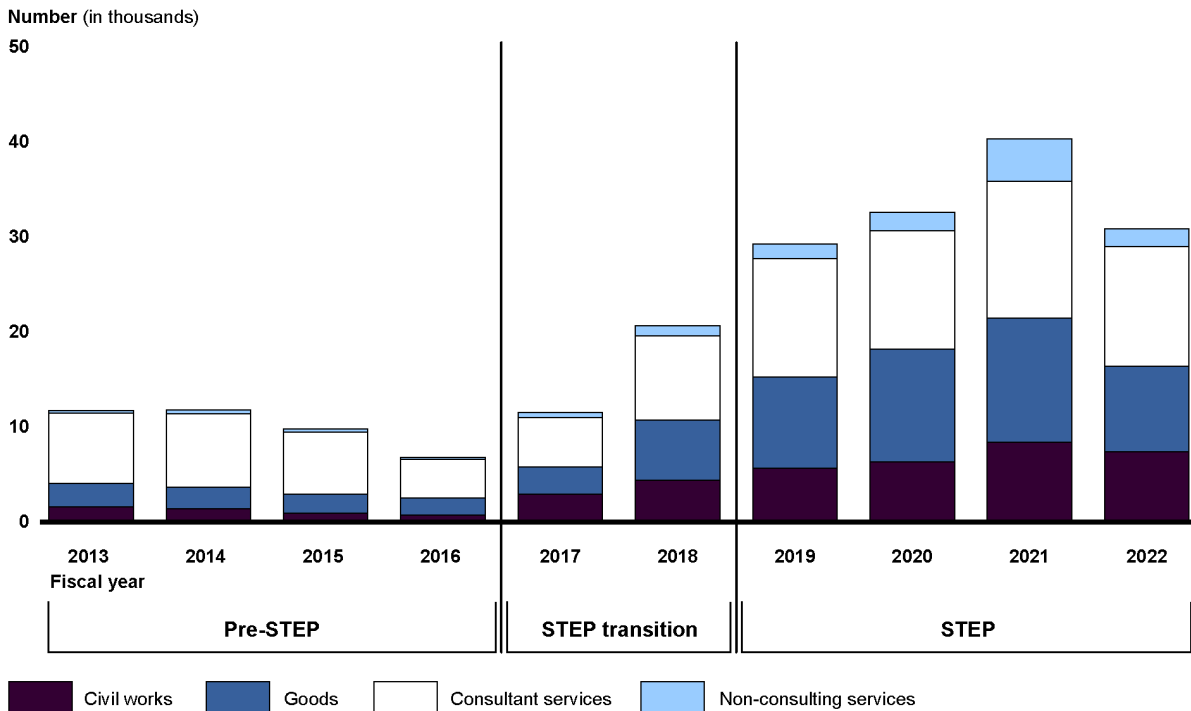
Source: GAO analysis of World Bank data (as of 11/1/2022). | GAO-23-105543

Note: Contracts may be awarded to both companies and individuals. The World Bank's fiscal year (FY) begins July 1st. The World Bank reports data on four major procurement categories: civil works, goods, consultant services, and non-consulting services. The World Bank tracks borrowers' contract award data in STEP, an information management system. Borrowers enter all data into STEP. According to World Bank officials, they began transitioning borrowers to STEP in FY 2017, and all borrowers used STEP beginning in FY 2019. Prior to STEP, World Bank officials said they only collected data on prior-reviewed awards. As a result, data from FY 2018 and earlier lack information on an unknown number of contracts and contract dollars. Contracts subject to prior review are those that exceeded a certain dollar amount threshold based on the type of procurement, the procurement activity, and the risk assessed by the World Bank. The thresholds may be lower for specific countries, sectors, or projects. World Bank borrowers may update STEP data, and the public dataset changes frequently. Our analysis uses publicly available data as of November 1, 2022.

From FYs 2013 through 2022, World Bank borrowers awarded an average of around 21,000 contracts per year. Over the same period, the

number of contracts awarded ranged from around 7,000 in FY 2016 to around 40,000 in FY 2021.<sup>20</sup> The most frequent number of contracts awarded each year were for consultant services, as shown in figure 2.

**Figure 2: Number of World Bank Borrower-Awarded Contracts by Procurement Category, FYs 2013-2022**



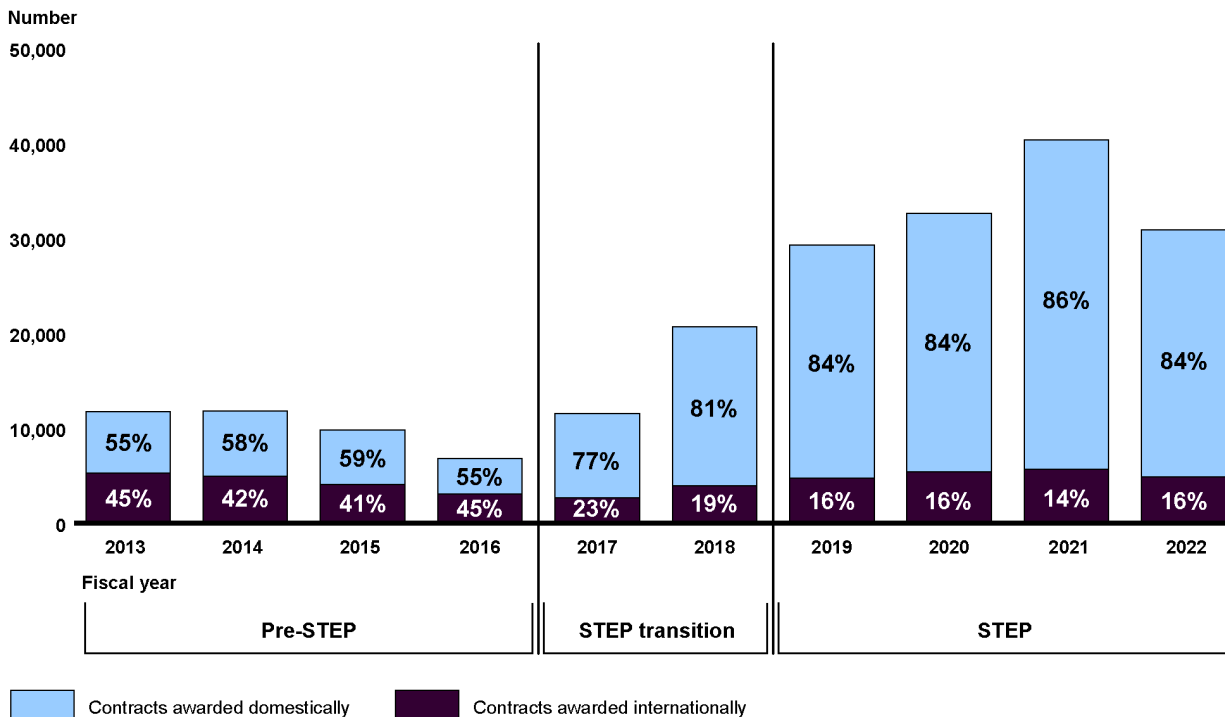
Note: Contracts may be awarded to both companies and individuals. The World Bank's fiscal year (FY) begins July 1st. The World Bank reports data on four major procurement categories: civil works, goods, consultant services, and non-consulting services. The World Bank tracks borrowers' contract award data in STEP, an information management system. Borrowers enter all data into STEP. According to World Bank officials, they began transitioning borrowers to STEP in FY 2017, and all borrowers used STEP beginning in FY 2019. Prior to STEP, World Bank officials said they only collected data on prior-reviewed awards. As a result, data from FY 2018 and earlier lack information on an unknown number of contracts and contract dollars. Contracts subject to prior review are those that exceeded a certain dollar amount threshold based on the type of procurement, the procurement activity, and the risk assessed by the World Bank. The thresholds may be lower for specific countries, sectors, or projects. World Bank borrowers may update STEP data, and the public dataset changes frequently. Our analysis uses publicly available data as of November 1, 2022.

<sup>20</sup>The increase in the total number of contracts may be attributed in part to the implementation of STEP. According to World Bank officials, the World Bank transitioned borrowers to STEP between FYs 2017 and 2018, and, beginning in FY 2019, borrowers were required to record all contract awards in STEP.

## Borrowers Awarded More Contracts to Domestic than International Businesses, but about the Same Share of Contract Dollars

From FYs 2013 through 2022, World Bank borrowers awarded the majority of contracts to domestic businesses.<sup>21</sup> On average, over the period, domestic businesses were awarded approximately 78 percent of contracts, while international businesses were awarded approximately 22 percent. Figure 3 illustrates the percentage and number of contracts that borrowers awarded to domestic and international businesses each year during this period.

**Figure 3: Percentage and Number of Domestic and International Contracts Awarded to Businesses by World Bank Borrowers, FYs 2013-2022**



Legend: Systematic Tracking of Exchanges in Procurement = STEP.  
Source: GAO analysis of World Bank data (as of 11/1/2022). | GAO-23-105543

<sup>21</sup>Throughout this report, we use the terms “domestic businesses” to refer to businesses registered within the borrower country and “domestic contracts” to refer to contracts awarded by borrowers to domestic businesses, as reported in World Bank data. We use the terms “international businesses” to refer to businesses registered outside of the borrower country and “international contracts” to refer to contracts awarded by borrowers to international businesses, as reported in World Bank data. According to World Bank officials, since the U.S. is not a World Bank borrower, no domestic World Bank-financed procurement market exists in the U.S., which affects the number of World Bank-financed contracts awarded to businesses in the U.S.



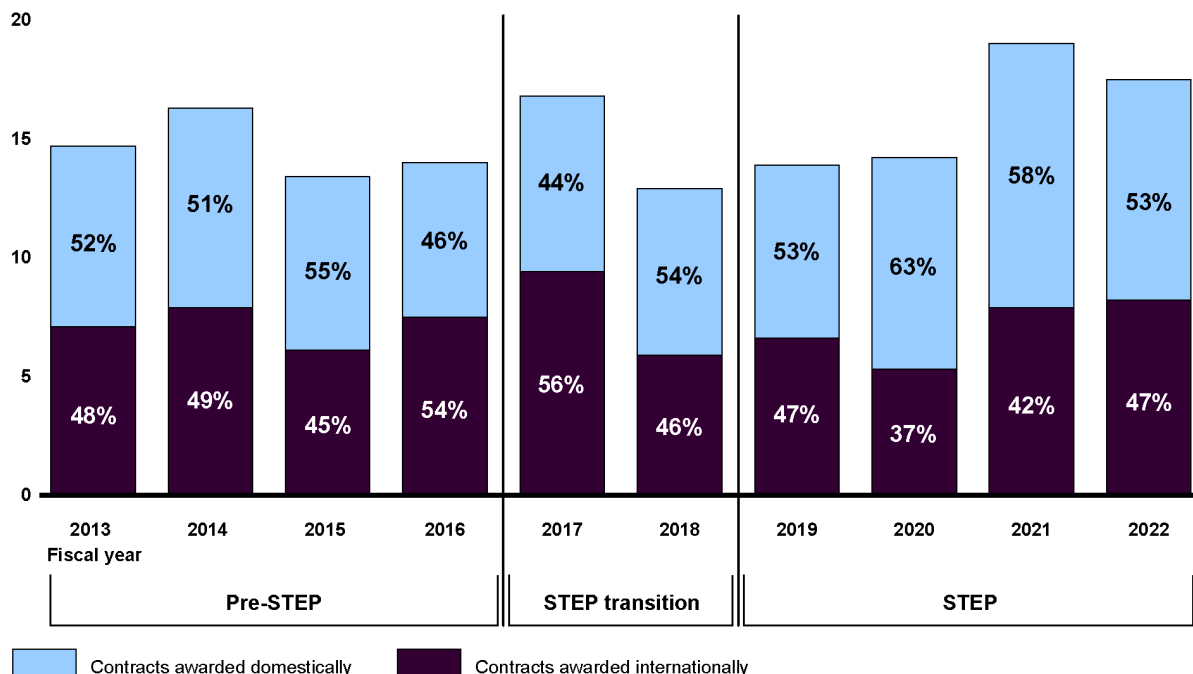
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Note: Domestic contracts are contracts awarded by borrowers to businesses registered within the borrower's country, and international contracts are contracts awarded by borrowers to businesses registered outside the borrower's country, as reported in World Bank data. Businesses include both companies and individuals that were awarded contracts. According to the World Bank, businesses are reported based on their country of legal registration, which may not take into account such issues as beneficial ownership, multi-national corporate structures, joint ventures, or other considerations that may affect determinations of nationality and ownership. The World Bank's fiscal year (FY) begins July 1st. The World Bank tracks borrowers' contract award data in STEP, an information management system. Borrowers enter all data into STEP. According to World Bank officials, they began transitioning borrowers to STEP in FY 2017, and all borrowers used STEP beginning in FY 2019. Prior to STEP, World Bank officials said they only collected data on prior-reviewed awards. As a result, data from FY 2018 and earlier lack information on an unknown number of contracts and contract dollars. Contracts subject to prior review are those that exceeded a certain dollar amount threshold based on the type of procurement, the procurement activity, and the risk assessed by the World Bank. The thresholds may be lower for specific countries, sectors, or projects. World Bank borrowers may update STEP data, and the public dataset changes frequently. Our analysis uses publicly available data as of November 1, 2022.

From FYs 2013 through 2022, borrowers awarded domestic and international businesses approximately 53 percent and 47 percent of contract dollars, respectively. Figure 4 illustrates the percentage and amount of contract dollars that borrowers awarded to domestic and international businesses during this period.

**Figure 4: Percentage and Dollar Amount of Domestic and International Contracts Awarded to Businesses by World Bank Borrowers, FYs 2013-2022**

Dollars (in billions)



■ Contracts awarded domestically
 ■ Contracts awarded internationally

Legend: Systematic Tracking of Exchanges in Procurement = STEP.

Source: GAO analysis of World Bank data (as of 11/1/2022). | GAO-23-105543

Note: Domestic contracts are contracts awarded by borrowers to businesses registered within the borrower's country, and international contracts are contracts awarded by borrowers to businesses registered outside the borrower's country, as reported in World Bank data. Businesses include both companies and individuals that were awarded contracts. According to the World Bank, businesses are reported based on their country of legal registration, which may not take into account such issues as beneficial ownership, multi-national corporate structures, joint ventures, or other considerations that may affect determinations of nationality and ownership. The World Bank's fiscal year (FY) begins July 1st. The World Bank tracks borrowers' contract award data in STEP, an information management system. Borrowers enter all data into STEP. According to World Bank officials, they began transitioning borrowers to STEP in FY 2017, and all borrowers used STEP beginning in FY 2019. Prior to STEP, World Bank officials said they only collected data on prior-reviewed awards. As a result, data from FY 2018 and earlier lack information on an unknown number of contracts and contract dollars. Contracts subject to prior review are those that exceeded a certain dollar amount threshold based on the type of procurement, the procurement activity, and the risk assessed by the World Bank. The thresholds may be lower for specific countries, sectors, or projects. World Bank borrowers may update STEP data, and the public dataset changes frequently. Our analysis uses publicly available data as of November 1, 2022.

World Bank Data Indicate  
Businesses in the U.S.  
Were Awarded a Small  
Share of Contract Dollars

Businesses in the U.S. Were  
Awarded around One Percent  
of Total Contract Dollars

Businesses in the U.S. were awarded around 1 percent of total contract dollars from FYs 2013 through 2022, which ranked them 15th among businesses in all countries. Businesses in China and India—the top two recipients of awards by contract dollars—were awarded around 20 percent and 14 percent of all contract dollars, respectively. Many countries whose businesses were awarded World Bank borrower contracts are also World Bank borrowers, including China and India. China and India are two of the three largest World Bank borrowers and their domestic awards are reflected in these totals.<sup>22</sup> According to World Bank officials, the U.S. is not a World Bank borrower and therefore has no domestic World Bank-financed procurement market, which may limit the number and dollars of World Bank-financed contracts awarded to businesses in the U.S. Table 1 shows the ranking of the top 15 countries whose businesses were awarded World Bank borrower-awarded contract dollars.

**Table 1: Ranking of Countries Whose Businesses Were Awarded the Largest Share of World Bank Borrower-Awarded Contract Dollars, FYs 2013-2022**

Ranking	Country	Percentage of total contract dollars awarded to businesses in the country
1	China	19.5
2	India	13.6
3	Brazil	4.0
4	Vietnam	3.1
5	Turkey	3.1
6	Italy	2.5
7	Spain	2.4
8	Argentina	2.2
9	France	2.1
10	Bangladesh	1.8
11	Nigeria	1.6

<sup>22</sup>According to World Bank data, India, Bangladesh, and China are the three largest World Bank borrowers in total project commitments between FYs 2013 through 2022.

Ranking	Country	Percentage of total contract dollars awarded to businesses in the country
12	Afghanistan	1.5
13	Indonesia	1.4
14	Germany	1.2
15	United States	1.1
N/A	All Others	39.1

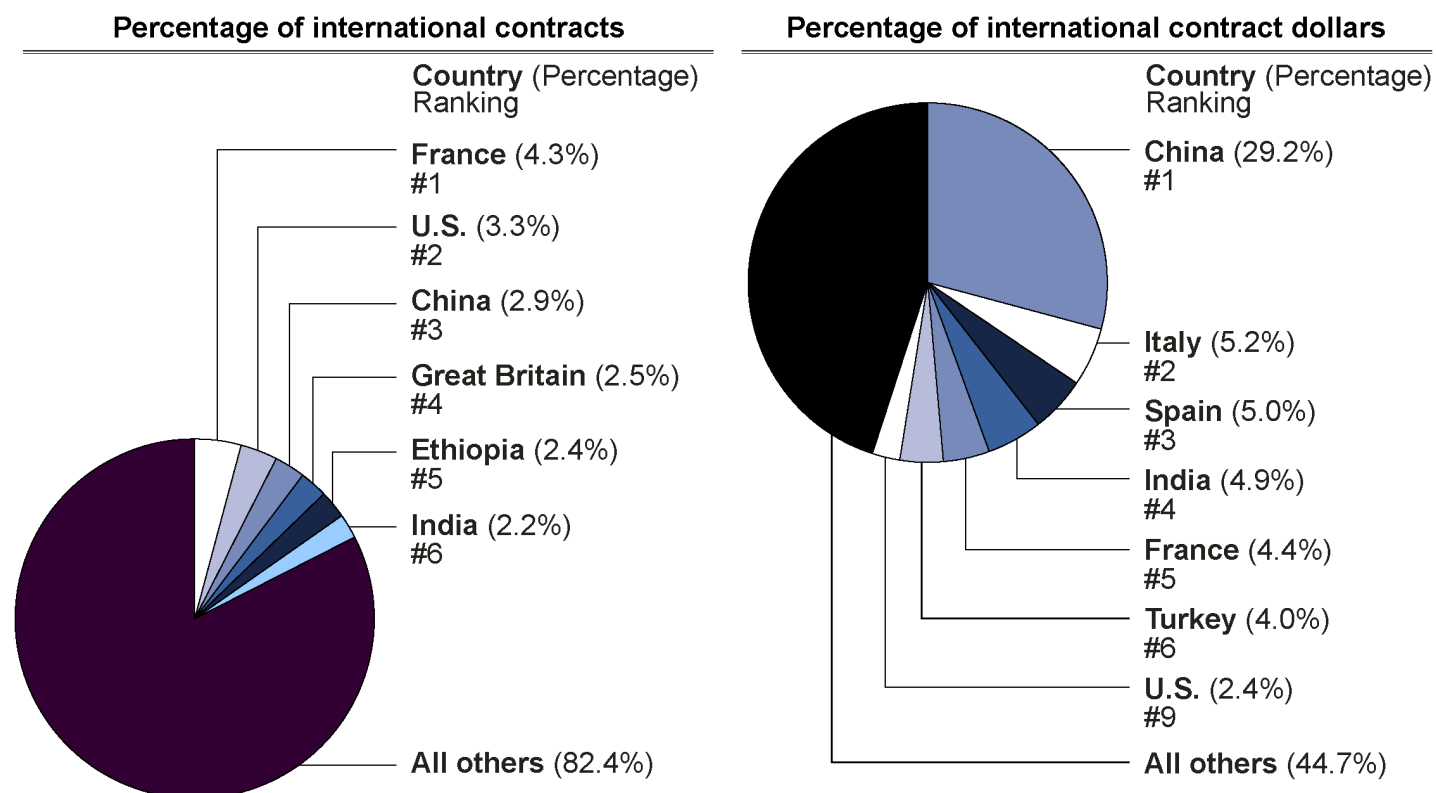
Source: GAO analysis of World Bank data (as of 11/01/2022). | GAO-23-105543

Note: Businesses include both companies and individuals that were awarded contracts. According to the World Bank, businesses are reported based on their country of legal registration, which may not take into account such issues as beneficial ownership, multi-national corporate structures, joint ventures, or other considerations that may affect determinations of nationality and ownership. The World Bank's fiscal year (FY) begins July 1st. The World Bank tracks borrowers' contract award data in Systematic Tracking of Exchanges in Procurement (STEP), an information management system. Borrowers enter all data into STEP. According to World Bank officials, they began transitioning borrowers to STEP in FY 2017, and all borrowers used STEP beginning in FY 2019. Prior to STEP, the officials said they only collected data on prior-reviewed awards. As a result, data from FY 2018 and earlier lack information on an unknown number of contracts and contract dollars. Contracts subject to prior review are those that exceeded a certain dollar amount threshold based on the type of procurement, the procurement activity, and the risk assessed by the World Bank. The thresholds may be lower for specific countries, sectors, or projects. World Bank borrowers may update STEP data, and the public dataset changes frequently. Our analysis uses publicly available data as of November 1, 2022. Percentages do not sum to 100 because of rounding. All others include contracts awarded to multilateral organizations such as the United Nations.

### Businesses in the U.S. Were Among the Top Three Awardees of International Contracts by Number, but Not by Contract Dollars

From FYs 2013 through 2022, businesses in the U.S. were awarded the second-highest number of international contracts (about 3 percent). However, in terms of value, businesses in the U.S. were awarded the ninth-highest amount of international contract dollars (about 2 percent). In contrast, businesses in France were awarded the highest number of international contracts (about 4 percent), and ranked fifth among awardees for international contract dollars (about 4 percent). Businesses in China were awarded the third-highest number of international contracts (about 3 percent), and were awarded the most contract dollars (about 29 percent). Figure 5 shows the percentage of the number and dollar value of international contracts awarded to businesses in selected countries from FYs 2013 through 2022.

**Figure 5: Percentage and Rank Order of International Contracts and Contract Dollars World Bank Borrowers Awarded to Businesses in Selected Countries, FYs 2013-2022**

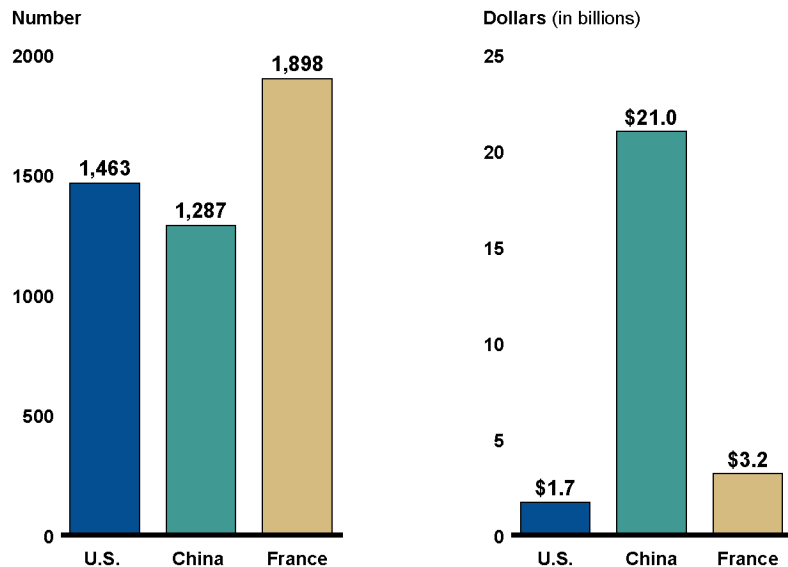


Source: GAO analysis of World Bank data (as of 11/1/2022). | GAO-23-105543

Note: International contracts are contracts awarded by borrowers to businesses registered outside the borrower's country, as reported in World Bank data. According to the World Bank, businesses are reported based on their country of legal registration, which may not take into account such issues as beneficial ownership, multi-national corporate structures, joint ventures, or other considerations that may affect determinations of nationality and ownership. Businesses include both companies and individuals that were awarded contracts. The World Bank's fiscal year (FY) begins July 1st. The World Bank tracks borrowers' contract award data in Systematic Tracking of Exchanges in Procurement (STEP), an information management system. Borrowers enter all data into STEP. According to World Bank officials, they began transitioning borrowers to STEP in FY 2017, and all borrowers used STEP beginning in FY 2019. Prior to STEP, the officials said they only collected data on prior-reviewed awards. As a result, data from FY 2018 and earlier lacks information on an unknown number of contracts and contract dollars. Contracts subject to prior review are those that exceeded a certain dollar amount threshold based on the type of procurement, the procurement activity, and the risk assessed by the World Bank. The thresholds may be lower for specific countries, sectors, or projects. World Bank borrowers may update STEP data, and the public dataset changes frequently. Our analysis uses publicly available data as of November 1, 2022. Percentages do not sum to 100 because of rounding. All others include contracts awarded to multilateral organizations such as the United Nations.

While businesses in the U.S. and France were awarded a higher number of international contracts than businesses in China, the international contract dollars awarded to businesses in China were around 12 times greater than to businesses in the U.S. and seven times greater than to businesses in France. Figure 6 compares the number of international contracts and international contract dollars awarded to businesses in the U.S., China, and France.

**Figure 6: Number of International Contracts and International Contract Dollars World Bank Borrowers Awarded to Businesses in the U.S., China, and France, FYs 2013-2022**



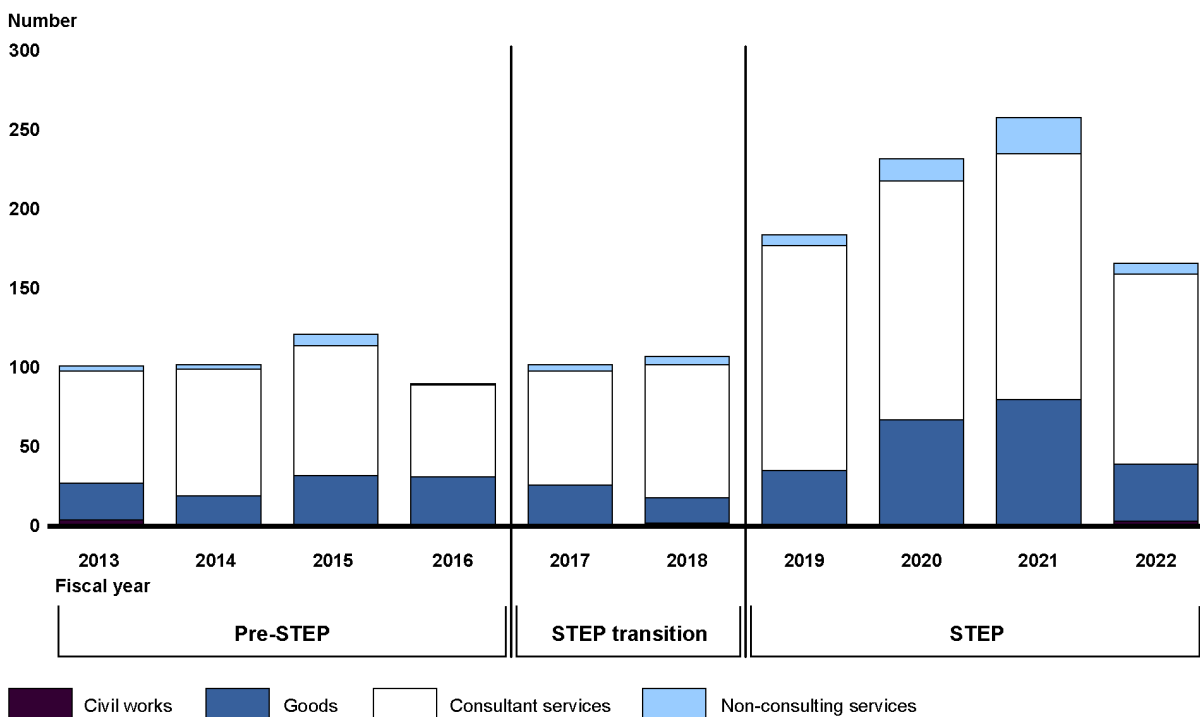
Source: GAO analysis of World Bank data (as of 11/1/2022). | GAO-23-105543

Note: International contracts are contracts awarded by borrowers to businesses registered outside the borrower's country, as reported in World Bank data. Businesses include both companies and individuals that were awarded contracts. According to the World Bank, businesses are reported based on their country of legal registration, which may not take into account such issues as beneficial ownership, multi-national corporate structures, joint ventures, or other considerations that may affect determinations of nationality and ownership. The World Bank's fiscal year (FY) begins July 1st. The World Bank tracks borrowers' contract award data in Systematic Tracking of Exchanges in Procurement (STEP), an information management system. Borrowers enter all data into STEP. According to World Bank officials, they began transitioning borrowers to STEP in FY 2017, and all borrowers used STEP beginning in FY 2019. Prior to STEP, the officials said they only collected data on prior-reviewed awards. As a result, data from FY 2018 and earlier lack information on an unknown number of contracts and contract dollars. Contracts subject to prior review are those that exceeded a certain dollar amount threshold based on the type of procurement, the procurement activity, and the risk assessed by the World Bank. The thresholds may be lower for specific countries, sectors, or projects. World Bank borrowers may update STEP data, and the public dataset changes frequently. Our analysis uses publicly available data as of November 1, 2022.

The Majority of International Contracts Awarded to Businesses in the U.S. Were for Consultant Services

The highest percentage of international contracts awarded to businesses in the U.S. from FYs 2013 through 2022 were for consultant services (about 69 percent), while the smallest percentage were for civil works (about 1 percent). Figure 7 shows the number of international contracts awarded to businesses in the U.S. by procurement category, from FYs 2013 through 2022.<sup>23</sup>

**Figure 7: Number of International Contracts World Bank Borrowers Awarded to Businesses in the U.S. by Procurement Category, FYs 2013-2022**



Legend: Systematic Tracking of Exchanges in Procurement = STEP.

Source: GAO analysis of World Bank data (as of 11/1/2022). | GAO-23-105543

Note: International contracts are contracts awarded by borrowers to businesses registered outside the borrower's country, as reported in World Bank data. Businesses include both companies and individuals that were awarded contracts. According to the World Bank, businesses are reported based on their country of legal registration, which may not take into account such issues as beneficial ownership, multi-national corporate structures, joint ventures, or other considerations that may affect determinations of nationality and ownership. The World Bank's fiscal year (FY) begins July 1st. The World Bank tracks borrowers' contract award data in STEP, an information management system. Borrowers enter all data into STEP. According to World Bank officials, they began transitioning

<sup>23</sup>The increase in the total number of international contracts may be attributed in part to the implementation of STEP. According to World Bank officials, the World Bank transitioned borrowers to STEP between FYs 2017 and 2018, and, beginning in FY 2019, borrowers were required to record all contract awards in STEP.

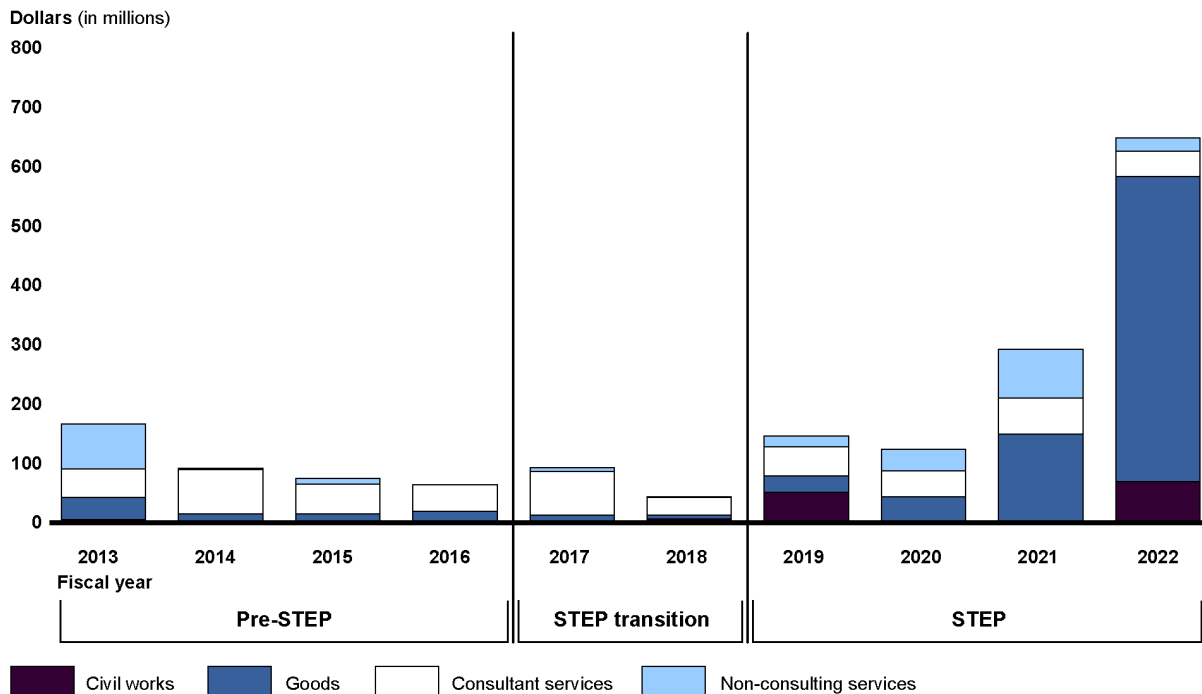
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borrowers to STEP in FY 2017, and all borrowers used STEP beginning in FY 2019. Prior to STEP, the officials said they only collected data on prior-reviewed awards. As a result, data from FY 2018 and earlier lacks information on an unknown number of contracts and contract dollars. Contracts subject to prior review are those that exceeded a certain dollar amount threshold based on the type of procurement, the procurement activity, and the risk assessed by the World Bank. The thresholds may be lower for specific countries, sectors, or projects. World Bank borrowers may update STEP data, and the public dataset changes frequently. Our analysis uses publicly available data as of November 1, 2022. The World Bank reports data on four major procurement categories: civil works, goods, consultant services, and non-consulting services.

In FYs 2013 through 2022, the highest share of international contract dollars awarded to businesses in the U.S. were for goods (about 48 percent). Specifically, according to World Bank data, a business in the U.S. was awarded several high-value international contracts to provide COVID-19 vaccines in FYs 2021 and 2022. Over the same 10-year period, around 30 percent of awards to businesses in the U.S. were for consultant services, while around 15 percent were for non-consulting services. The World Bank's data shows that in FYs 2021 and 2022, businesses in the U.S. were awarded international civil works contracts. Figure 8 shows the international contract dollars awarded to businesses in the U.S. by procurement category, from FYs 2013 through 2022.



**Figure 8: International Contract Dollars World Bank Borrowers Awarded to Businesses in the U.S. by Procurement Category, FYs 2013-2022**



Source: GAO analysis of World Bank data (as of 11/1/2022). | GAO-23-105543

Note: International contracts are contracts awarded by borrowers to businesses registered outside the borrower's country, as reported in World Bank data. Businesses include both companies and individuals that were awarded contracts. According to the World Bank, businesses are reported based on their country of legal registration, which may not take into account such issues as beneficial ownership, multi-national corporate structures, joint ventures, or other considerations that may affect determinations of nationality and ownership. The World Bank's fiscal year (FY) begins July 1st. The World Bank tracks borrowers' contract award data in STEP, an information management system. Borrowers enter all data into STEP. According to World Bank officials, they began transitioning borrowers to STEP in FY 2017, and all borrowers used STEP beginning in FY 2019. Prior to STEP, the officials said they only collected data on prior-reviewed awards. As a result, data from FY 2018 and earlier lacks information on an unknown number of contracts and contract dollars. Contracts subject to prior review are those that exceeded a certain dollar amount threshold based on the type of procurement, the procurement activity, and the risk assessed by the World Bank. The thresholds may be lower for specific countries, sectors, or projects. World Bank borrowers may update STEP data, and the public dataset changes frequently. Our analysis uses publicly available data as of November 1, 2022. The World Bank reports data on four major procurement categories: civil works, goods, consultant services, and non-consulting services.

As a percentage of all international contract dollars, businesses in the U.S. were among the top five awardees by country in the goods, consultant services, and non-consulting services categories from FYs 2013 through 2022. Businesses in France were awarded the most contract dollars for consultant services, businesses in the U.S. were

awarded the most contract dollars for non-consulting services, and businesses in China were awarded the most contract dollars for civil works and goods contracts during this period. Table 2 shows the percentage of international contract dollars awarded to businesses in the top five countries by procurement category from FYs 2013 through 2022.

**Table 2: Percentage of International Contract Dollars World Bank Borrowers Awarded to Businesses in the Top Five Countries Along with Businesses in the U.S., by Procurement Category, FYs 2013-2022**

Civil Works		Goods		Consultant services		Non-consulting services	
Country	Percentage	Country	Percentage	Country	Percentage	Country	Percentage
China	41.3	China	22.4	France	8.7	U.S.	12.1
Spain	7.7	Italy	6.6	Canada	5.6	China	9.5
Turkey	6.3	India	6.3	Germany	5.4	Sudan	2.6
Italy	5.5	Switzerland	5.5	Great Britain	5.3	France	2.4
Brazil	5.2	U.S.	4.6	U.S.	4.6	Spain	2.3

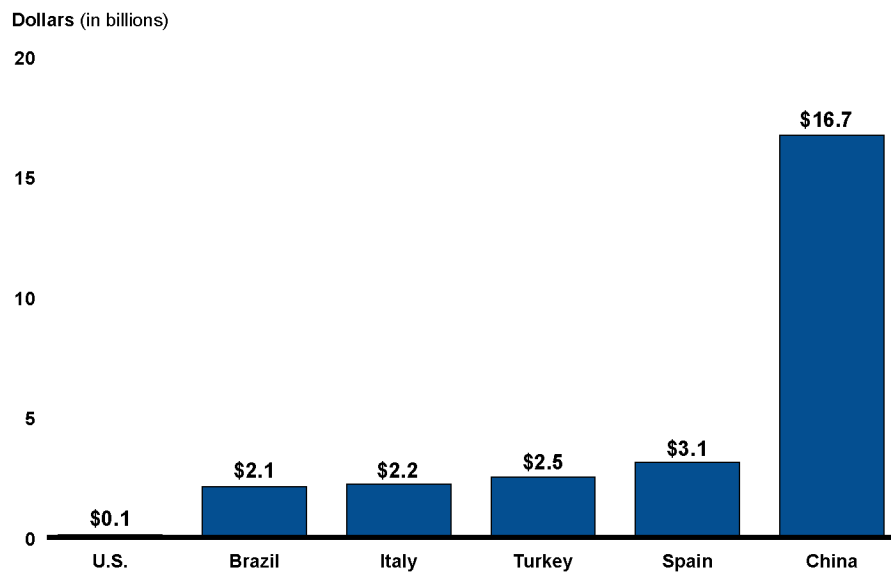
Source: GAO analysis of World Bank data (as of 11/01/2022). | GAO-23-105543

Note: International contracts are contracts awarded by borrowers to businesses registered outside the borrower’s country, as reported in World Bank data. Businesses include both companies and individuals that were awarded contracts. According to the World Bank, businesses are reported based on their country of legal registration, which may not take into account such issues as beneficial ownership, multi-national corporate structures, joint ventures, or other considerations that may affect determinations of nationality and ownership. The World Bank reports data on four major procurement categories: civil works, goods, consultant services, and non-consulting services. The World Bank’s fiscal year (FY) begins July 1st. The World Bank tracks borrowers’ contract award data in Systematic Tracking of Exchanges in Procurement (STEP), an information management system. Borrowers enter all data into STEP. According to World Bank officials, they began transitioning borrowers to STEP in FY 2017, and all borrowers used STEP beginning in FY 2019. Prior to STEP, the officials said they only collected data on prior-reviewed awards. As a result, data from FY 2018 and earlier lack information on an unknown number of contracts and contract dollars. Contracts subject to prior review are those that exceeded a certain dollar amount threshold based on the type of procurement, the procurement activity, and the risk assessed by the World Bank. The thresholds may be lower for specific countries, sectors, or projects. World Bank borrowers may update STEP data, and the public dataset changes frequently. Our analysis uses publicly available data as of November 1, 2022. The data also includes contracts awarded to multilateral organizations such as the United Nations.

Civil works contracts accounted for about 7 percent of international contracts, but around 56 percent of all international contract dollars. From FYs 2013 through 2022, businesses in China were awarded around 41 percent of international civil works contract dollars, while businesses in the U.S. were awarded about 0.3 percent in this category. The World Bank’s data shows that several high-value civil works contracts were awarded to businesses in China in FY 2017 for a hydropower project in

Pakistan.<sup>24</sup> Figure 9 shows the international civil works contract dollars awarded to businesses in the top five countries, along with businesses in the U.S., from FYs 2013 through 2022.

**Figure 9: International Civil Works Contract Dollars World Bank Borrowers Awarded to Businesses in the Top Five Countries Along with Businesses in the U.S., FYs 2013-2022**



Source: GAO analysis of World Bank data (as of 11/1/2022). | GAO-23-105543

Note: International contracts are contracts awarded by borrowers to businesses registered outside the borrower's country, as reported in World Bank data. Businesses include both companies and individuals that were awarded contracts. According to the World Bank, businesses are reported based on their country of legal registration, which may not take into account such issues as beneficial ownership, multi-national corporate structures, joint ventures, or other considerations that may affect determinations of nationality and ownership. The selected countries represent the top five percent of international contract dollars awarded for civil works based on the business's country of registration, as well as businesses in the U.S. from FYs 2013 through 2022. The World Bank's fiscal year (FY) begins July 1st. The World Bank tracks borrowers' contract award data in Systematic Tracking of Exchanges in Procurement (STEP), an information management system. Borrowers enter all data into STEP. According to World Bank officials, they began transitioning borrowers to STEP in FY 2017, and all borrowers used STEP beginning in FY 2019. Prior to STEP, the officials said they only collected data on prior-reviewed awards. As a result, data from FY 2018 and earlier lack information on an unknown number of contracts and contract dollars. Contracts subject to prior review are those that exceeded a certain dollar amount threshold based on the type of procurement, the procurement activity, and the risk assessed by the World Bank. The thresholds may be lower for specific countries, sectors, or projects. World Bank borrowers may update STEP data, and the public dataset changes frequently. Our analysis uses publicly available data as of November 1, 2022.

<sup>24</sup>According to World Bank data, contracts awarded for the Dasu Hydropower Project—totaling approximately \$3.1 billion—accounted for 25.6% of the total contract dollars awarded for civil works in FY 2017.

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Businesses in the U.S. Bid on Few Contracts, but Were Often Awarded Contracts When They Bid

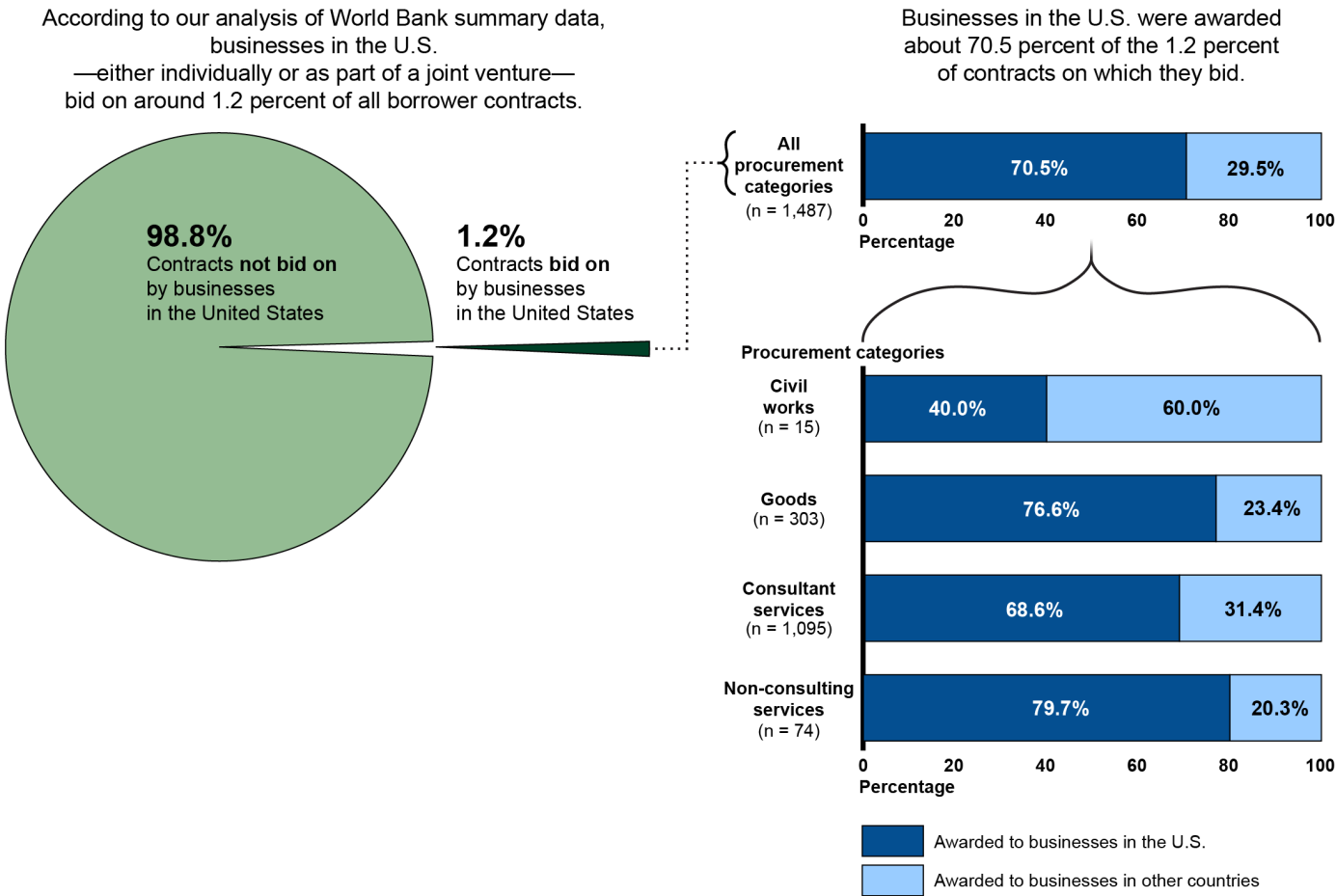
According to our analysis of World Bank summary data, businesses in the U.S. bid on few contracts, but were often awarded the contracts when they bid.<sup>25</sup> From FYs 2017 through October 13, 2022, businesses in the U.S.—either individually or as part of a joint venture—bid on around 1.2 percent of all borrower contracts and were awarded about 70.5 percent of those contracts on which they bid, according to our analysis of World Bank summary bid data.<sup>26</sup> Figure 10 shows the percentages of contracts that businesses in the U.S. bid on and were awarded from FYs 2017 through October 13, 2022.

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<sup>25</sup>The World Bank does not publish bid data in a specific dataset. We asked World Bank officials to provide us with summary analysis of the number of contracts bid on by and awarded to businesses in the U.S. According to the World Bank, it generated summary numbers from STEP data for all contracts signed from FY 2017 through October 13, 2022 for all four procurement categories.

<sup>26</sup>The percentage of contracts awarded to businesses in the U.S. when they bid varied by procurement category, from about 80 percent for non-consulting services; about 77 percent for goods; about 69 percent for consultant services; and 40 percent for civil works.

Figure 10: Percentages of World Bank Borrower Contracts Bid on by and Awarded to Businesses in the U.S., FY 2017-October 13, 2022



Source: GAO analysis of World Bank summary data. | GAO-23-105543

Note: Businesses include both companies and individuals that were awarded contracts. The World Bank’s fiscal year (FY) begins July 1st. The World Bank provided GAO summary analysis of the number of contracts bid on by and awarded to businesses in the U.S. The World Bank generated these summary numbers from Systematic Tracking of Exchanges in Procurement system for all contracts signed from FY 2017 through October 13, 2022. According to World Bank officials, businesses included in this analysis may have bid individually or as part of a joint venture, and in some cases more than one business in the U.S. may have bid on the same contract.

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World Bank Data on  
Contracts that Businesses  
in the U.S. Were Awarded  
May be Over or  
Underestimated Due to  
Data Limitations

While the World Bank requires borrowers to record contract award information in STEP, including name and country of registration of contract awardees, the World Bank does not collect and report on all beneficial ownership information, or information on subcontractors.<sup>27</sup> As a result, the number of contracts and contract dollars that were awarded to businesses in a particular country, including those in the U.S., may be over or underestimated.<sup>28</sup>

Beneficial Ownership  
Information is Not Collected or  
Reported for All Businesses

The World Bank does not collect and report the beneficial ownership information of all businesses that were awarded contracts, such as details of the business's ownership structure that may indicate if the business is owned, in part, by other foreign entities. Many businesses use foreign subsidiaries, and without the disclosure of beneficial ownership information for all contract awardees, the number of contracts and contract dollars attributed to businesses that have subsidiaries in other countries may be over or underestimated.<sup>29</sup> Our review of the World Bank's data identified instances where foreign subsidiaries of businesses in the U.S. were awarded contracts. In these instances, the World Bank data reported these contracts as being awarded to the non-U.S. country of registration of those subsidiaries, which may result in underestimating the number of contracts and contract dollars attributed to businesses in the U.S. For example:

- We identified several foreign subsidiaries of a publicly owned, U.S.-based pharmaceuticals business that collectively were awarded approximately \$830 million in contract dollars between FYs 2017 and 2022. During that same period, the U.S.-based parent business was

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<sup>27</sup>According to the World Bank, beneficial ownership refers to the person who ultimately owns or controls a company, or who materially benefits from the assets held by a company.

<sup>28</sup>We have previously reported on the challenges of determining the entity or country that received an economic benefit through international trade due to the complexity of and differences between the country of registration, country of beneficial ownership, country of product or service origin, and the country of contract performance. See GAO, *International Trade: Foreign Sourcing in Government Procurement*, [GAO-19-414](#) (Washington, D.C.: May 30, 2019).

<sup>29</sup>This includes businesses in the U.S. and other countries. For example, if a borrower awarded a contract to the Canadian subsidiary of a business in the U.S., the World Bank data would attribute the contract award to a business in Canada. Therefore, depending on the corporate structure of the subsidiary and the business in the U.S., the data may overstate awards to businesses in Canada and understate awards to businesses in the U.S. Similarly, an award to the U.S. subsidiary of a business in Canada may overstate awards to businesses in the U.S. and understate awards to businesses in Canada.

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awarded approximately \$583 million in contract dollars. The World Bank's data attributes only the approximately \$583 million as being awarded to a business in the U.S.<sup>30</sup>

- We also identified several foreign subsidiaries of a publicly owned, U.S.-based manufacturing and engineering business that collectively were awarded approximately \$32 million in contract dollars between FYs 2017 and 2022. During that same period, the U.S.-registered parent business was awarded around \$4 million in contract dollars. The World Bank's data attributes only the approximately \$4 million in contract dollars as being awarded to a business in the U.S.<sup>31</sup>

In November 2017, the World Bank launched a beneficial ownership reporting pilot program. The program required borrowers to publish beneficial ownership information for contracts that met certain thresholds.<sup>32</sup> As of FY 2021, beneficial ownership information was disclosed for nine eligible awarded contracts with combined contract dollars of about \$1.9 billion, according to World Bank documentation. According to the World Bank, in FY 2022 there were 38 ongoing procurements subject to the pilot program, accounting for around \$5.8 billion in combined contract dollars. In FY 2023, the World Bank expanded the pilot to include all internationally advertised contracts. Under the initial and expanded pilot programs, beneficial ownership information is collected in STEP and publicly reported in individual project documentation, but is not published in the World Bank's consolidated public borrower contract award data. As a result, the relevant information must be manually compiled to analyze trends related to beneficial ownership.

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<sup>30</sup>This example is presented to illustrate how much of the contract dollars could potentially be underestimated. Available public data do not show whether any of the approximately \$830 million flowed to the parent company.

<sup>31</sup>This example is presented to illustrate how much of the contract dollars could potentially be underestimated. Available public data do not show whether any of the approximately \$32 million flowed to the parent company.

<sup>32</sup>The pilot program applied to contract awardees for procurements valued over the World Bank's Operations Procurement Review Committee thresholds with a 'decision to appraise' on or after November 1, 2017. The thresholds vary based on the type and contract value of the procurement, and the procurement risk of the borrower as determined by the World Bank. For details of the thresholds, see World Bank Operational Manual BP 11.00 Annex D, *Mandatory Prior Review Thresholds for Regional Procurement Managers and the Operations Procurement Review Committee*.

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## The World Bank Does Not Collect Subcontract Data

Limitations in reporting beneficial ownership information for contract awardees is not unique to the World Bank, and we have previously reported on this challenge in the U.S. government.<sup>33</sup> Treasury's Financial Crimes Enforcement Network recently issued a final rule<sup>34</sup> establishing a beneficial ownership reporting requirement to increase corporate transparency in the U.S. Treasury also issued a notice of proposed rulemaking that would establish the access to and protection of beneficial ownership information.<sup>35</sup>

The World Bank does not require borrowers to report subcontract awards. As a result, the number of contracts and contract dollars that may be attributed to businesses in specific countries may be under or overestimated, if part of the contract was subcontracted to an entity with a business address in a different country from the contract awardee. However, some information on subcontracts may be identified on an award-by-award basis. For example, we identified an approximately \$48 million contract that was captured in the World Bank data as being awarded to a multilateral organization. However, our examination of the data found that the award to the multilateral organization was for the purchase of vaccines from a pharmaceuticals business headquartered in the U.S. Limitations in subcontract reporting are not limited to the World Bank, and we have previously reported on this challenge in the U.S. government.<sup>36</sup>

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<sup>33</sup>For example, see GAO, *Defense Procurement: Ongoing DOD Fraud Risk Assessment Efforts Should Include Contractor Ownership*, [GAO-20-106](#) (Washington, D.C.: Nov. 25, 2019) and *Aviation: FAA Needs to Better Prevent, Detect and Respond to Fraud and Abuse Risks in Aircraft Registration*, [GAO-20-164](#) (Washington, D.C.: Mar. 5, 2020).

<sup>34</sup>Beneficial Ownership Information Reporting Requirements, 87 Fed. Reg. 59,498 (Sept. 30, 2022) (to be codified at 31 C.F.R. pt. 1010). The final rule will be effective January 1, 2024.

<sup>35</sup>Beneficial Ownership Information Access and Safeguards, and Use of FinCEN Identifiers for Entities, 87 Fed. Reg. 77,404 (proposed Dec. 16, 2022) (to be codified at 31 C.F.R. pt. 1010).

<sup>36</sup>[GAO-20-106](#).



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## Analysis Indicates World Bank Borrowers Awarded Contracts to 28 Entities That May Have Been Present on U.S. Sanctions and Other Lists

Our analysis of World Bank borrower contract award data and selected U.S. sanctions and other lists of parties of concern found that World Bank borrowers awarded contracts to entities that may have been on those U.S. lists. We performed automated and manual review of the name and country of registration of World Bank borrower contract awardees and entities on U.S. government lists from calendar year 2017 to 2021. Based on our analysis, we identified 28 contract awardees that may have been present on selected U.S. lists at the time the contract was awarded. Our analysis provides an indication that a contract may have been awarded to an entity on a U.S. list, but cannot confirm it.

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## We Conducted Automated and Manual Reviews to Compare World Bank Borrower Awardees to Selected U.S. Sanctions and Other Lists

To examine the extent to which World Bank borrowers awarded contracts to entities that may have been on selected U.S. sanctions and other lists of parties of concern, we conducted automated matching analysis followed by a manual review.<sup>37</sup> First, we compiled a list of names and the associated countries of entities on selected U.S. sanctions and other lists of parties of concern.<sup>38</sup> We then compared those entity names and associated countries with the contract awardee names and countries of registration from World Bank borrower contract award data. For those results identified by our analysis, we manually reviewed each match to determine the extent to which the names overlapped. For matches where we determined the names significantly overlapped, we further reviewed whether the World Bank contract awardee was awarded a contract while the entity with the similar name was on a U.S. list.

Our analysis provides an indication that a contract was awarded to an entity that may have been on a U.S. list, but cannot confirm it. Our analysis is based on publicly available information, and the potential

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<sup>37</sup>To automatically flag records for review, we created an automated system for identifying and flagging World Bank contract awardees, the names of which (1) either partially or fully matched entities on selected U.S. sanctions or other lists of parties of concern and (2) were associated with the same country or countries as entities on U.S. lists. For example, attempting to match the entity "Alpha Beta Corp." to a World Bank contract award to the "Alpha Beta Gamma Corporation" would have produced a potential positive match. We then manually reviewed the high-confidence matches to determine the amount of overlap between the names.

<sup>38</sup>Specifically, we selected the Treasury Office of Foreign Assets Control Specially Designated Nationals And Blocked Persons List (SDN) and Consolidated Sanctions List (Non-SDN), the General Services Administration System for Awards Management Exclusions List, the Commerce Bureau of Industry and Security Entity, Unverified, and Military End User lists, and the Federal Communications Commission List of Equipment And Services Covered By Section 2 of The Secure Networks Act.

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matches we identified are based on names and their associated countries. While we took steps to eliminate false matches, the World Bank's data do not include other identifying information that could provide greater assurance of a match, such as beneficial ownership information, addresses, national documentation numbers, or dates of birth. Without such identifying information, our analysis cannot positively identify whether a World Bank borrower contract awardee is the same entity as on a selected U.S. sanctions or other list.

We also contacted Treasury, Commerce, and the World Bank to see if they were aware of these awards and could provide any additional information or explanations that we should consider. Treasury officials told us that Treasury is not responsible for monitoring individual borrower contract awards, which occur after the World Bank's board approves a project. Commerce International Trade Administration officials told us they had no comments on the specific awards that we identified. The World Bank provided us details of their review of contract awardees that may have been on Office of Foreign Assets Control (OFAC) sanctions lists.

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### World Bank Borrowers Awarded Contracts to 28 Entities That May Have Been Present on U.S. Sanctions and Other Lists

Our analysis of World Bank borrower contract award data and selected U.S. sanctions and other lists of parties of concern found that World Bank borrowers awarded contracts to 28 entities that may have been on selected U.S. lists. Specifically, of the approximately 150,000 contracts awarded from calendar years 2017 through 2021—representing approximately \$80 billion in contract dollars—we identified 28 contracts that borrowers awarded to entities that may have been on selected U.S. sanctions and other lists of parties of concern, representing around \$76 million in contract dollars.<sup>39</sup>

The World Bank prohibits borrowers from awarding contracts to certain entities debarred by the World Bank or other multilateral development banks. Additionally, according to World Bank officials, the World Bank prohibits borrowers from awarding contracts to entities subject to United Nations sanctions. Those officials also told us that according to its Articles of Agreement, the World Bank is not subject to sanctions imposed under its member countries' laws and regulations. However, according to the officials, the World Bank's Anti-Money Laundering and Countering Financing of Terrorism policies and procedures includes screening

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<sup>39</sup>The contract awards that we identified represent around 0.02 percent of the total number of contracts, and 0.1 percent of the total contract value we reviewed.

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against OFAC Specially Designated Nationals and Blocked Persons List (SDN List) and Consolidated Sanctions List (Non-SDN List), as well as United Kingdom and European Union sanctions lists. If the World Bank identifies an award recommendation to an entity on these sanctions lists, the World Bank informs the borrower that (1) the World Bank is not able to issue a direct payment (on behalf of the borrower) to a potential contract awardee, and (2) the borrower may not be able to process the payment themselves. If the borrower is not able to process the payment, the borrower may make alternative payment arrangements to pay the contract awardee.<sup>40</sup>

The 28 contracts were awarded to entities that may have appeared on selected U.S. sanctions or other lists of parties of concern for various reasons, and several entities may have appeared on more than one list.<sup>41</sup> Fifteen contracts may have been awarded to entities on Treasury OFAC lists and therefore may have had sanctions applied, such as Global Magnitsky or Non-SDN Chinese Military-Industrial Complex Companies sanctions.<sup>42</sup> Thirteen contracts may have been awarded to entities that were subject to export restrictions because they were listed on the Commerce Bureau of Industry and Security's Entity List or Unverified List. Fourteen contracts may have been awarded to entities that were excluded from receiving U.S. federal contracts in the General Services Administration System for Award Management.

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<sup>40</sup>We did not evaluate the World Bank's Anti-Money Laundering and Countering Financing of Terrorism policies and procedures, or how the World Bank screens contract awardees against sanctions lists. In an upcoming review of the World Bank's procurement processes, we plan to examine how the World Bank and borrowers perform due diligence on potential contract awardees.

<sup>41</sup>Specifically, 14 contracts were awarded to entities that may have appeared on two lists.

<sup>42</sup>The Global Magnitsky Human Rights Accountability Act authorizes the U.S. government to sanction foreign persons who (1) are responsible for gross violations of human rights, (2) acted as an agent of a foreign person responsible for a gross violation of human rights in specific matters, (3) are government officials involved in significant acts of corruption, or (4) have materially assisted a government official in a significant act of corruption. 22 U.S.C. § 2656 note. Executive Order 14032 of June 3, 2021 prohibits U.S. persons from buying or selling securities (or their derivatives) of any person who has been specifically listed or has been determined (1) to operate or have operated in the defense and related materiel sector or the surveillance technology sector of the economy of the PRC, or (2) to own or control, or to be owned or controlled by, directly or indirectly, a person who operates or has operated in any of those sectors, or a person who is listed in the Annex to the order or who has otherwise been determined to be subject to the prohibitions on transacting in securities. Addressing the Threat From Securities Investments That Finance Certain Companies of the People's Republic of China, Exec. Order No. 14032 (2021).

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Sixteen of the 28 awards we identified were less than \$1 million, including all contracts that were awarded to individuals. The remaining 12 contracts were awarded to businesses in China and were between approximately \$1 million and \$14 million. Overall, 18 of the 28 awards were awarded domestically (e.g., contracts awarded by China to businesses in China) and 10 were awarded internationally (e.g., contracts awarded by Uganda to businesses in China). Appendix II provides additional details of the awards to entities that may have been on selected U.S. sanctions or other lists of parties of concern, including the borrower country, awardee country, relevant reason for inclusion on a U.S. list, size of award, and the contract description.

Limited data on World Bank borrower contract awards and selected U.S. sanctions and other lists of parties of concern make it difficult to identify whether World Bank borrowers awarded contracts to entities that may have been on selected U.S. lists. For example, Treasury does not maintain machine-readable historical records of the names and relevant dates of entities on U.S. lists. Additionally, while the World Bank collects beneficial ownership information on contract awardees for contracts that meet certain thresholds, they do not report that information in a public, consolidated dataset.

We contacted Treasury, Commerce, and the World Bank to see if they were aware of these awards and could provide any additional information or explanations that we should consider. Treasury officials told us that Treasury is not responsible for individual borrower contract awards, nor are they able to monitor those awards, which occur after the World Bank's board approves a project. However, those officials noted that when they become aware of a contract award that may be of concern, they seek an explanation from the World Bank to determine whether any action should be taken.

Commerce International Trade Administration officials told us they had no comments on the specific awards that we identified. An International Trade Administration official noted that monitoring awards would be challenging because the World Bank does not publish bid data in a public, consolidated dataset, and contract award data may not be published until up to a year after the contract is finalized. As a result, officials using World Bank contract award data could only monitor contracts after the contracts are awarded. World Bank borrowers are required to publish a public notice of contract award within ten days of communicating that award determination to the contract awardee. According to the World

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Bank, 84 percent of contract awards are published within ten days, and 90 percent are published within 18 days.

Treasury provided additional details on two of the 15 contracts that, per our analysis, were awarded to entities that may have been on OFAC sanctions lists. For one contract awardee whose name matched a sanctioned entity except for a single word, Treasury stated that the related sanctions program does not apply to subsidiaries.<sup>43</sup> For the other contract awardee, Treasury noted that the individual who is the potential match on the sanctions list is currently incarcerated in the U.S.

Additionally, the World Bank provided comments on these 15 contract awards. Specifically, the World Bank noted that:

- For six contracts, the borrower established an alternative payment arrangement in order to pay the contract awardee. According to the World Bank, borrowers may make alternative payment arrangements if the World Bank identifies that the potential contract awardee is on a sanctions list used in the World Bank's screening and the World Bank will not be able to issue a direct payment to the potential awardee.
- For five contracts, according to the World Bank's assessment, the contract awardee was not the same entity that appeared on an OFAC sanctions list.
- For four contracts, the World Bank screened the contract awardee against OFAC sanctions lists and did not identify a match.

Comments on this analysis from Treasury and the World Bank on these 15 contract awards are reflected in Appendix II. Commerce, Treasury, and the World Bank did not provide any additional details regarding the contract awards that we identified in our analysis that may have been awarded to entities on BIS lists or the System for Award Management Exclusions List.

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## Agency Comments

We provided a draft of this report for review and comment to Treasury, Commerce, and the World Bank. Treasury and Commerce did not provide comments. The World Bank provided technical comments, which we incorporated as appropriate. In addition, the World Bank provided written comments, which are reprinted in Appendix III. In its written comments, the World Bank acknowledged our work and restated its commitment to

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<sup>43</sup>Specifically, China Mobile Communications Group Jiangsu Co., Ltd. was awarded a contract while China Mobile Communications Group CO., LTD. was on the OFAC Chinese Military-Industrial Complex Companies List. Jiangsu is a province in China.

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open, competitive procurement. The World Bank also stated that we found its borrower contract award data and information systems reliable. While we reviewed the borrower contract award data and found it reliable for use in our analyses, the World Bank does not guarantee the accuracy of data entered by borrowers. We identified a number of inconsistencies in the data, and the World Bank addressed or identified plans to address many of those inconsistencies during our review. We asked the World Bank to describe its controls over its information systems, but we did not independently test or evaluate those controls or the information systems. Appendix I provides details of the testing that we performed.

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We are sending copies of this report to the appropriate congressional requesters, the Secretary of the Treasury, the Secretary of Commerce, the President of the World Bank, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-4409 or [LoveGrayerL@gao.gov](mailto:LoveGrayerL@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in Appendix IV.



Latesha Love-Grayer  
Director, International Affairs and Trade

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# Appendix I: Objectives, Scope, and Methodology

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This report examines (1) the extent to which World Bank borrowers awarded contracts to businesses in the U.S. in comparison to businesses in other countries and (2) the extent to which World Bank borrowers awarded contracts to entities that may have been on selected U.S. sanctions or other lists of parties of concern, and what actions, if any, the Department of the Treasury (Treasury) took in response.

To obtain information for our objectives, we reviewed World Bank documents related to the Procurement Framework (effective World Bank fiscal year (FY) 2017), including policies and related procedures for procurement by borrowers under Investment Project Financing (IPF), as well as guidance and training for Systematic Tracking of Exchanges in Procurement (STEP).<sup>1</sup> We also reviewed other World Bank documents including the Articles of Agreement and Procedures on Sanctions Proceedings and Settlements in Bank Financed Projects. We obtained publicly available World Bank data on borrower contract awards from two datasets: (1) Major Contract Awards (MCA)<sup>2</sup> and (2) Contract Awards in IPF.<sup>3</sup> We interviewed World Bank officials regarding the World Bank's policies and procedures for borrower-implemented procurement and controls over STEP data.

We assessed the reliability of these data by reviewing for internal consistency; checking for duplicate entries, gaps, and obvious errors; comparing the datasets; and interviewing World Bank officials about their data collection and verification procedures. We identified two issues that affect the level of detail available about the recipients of borrower contract awards. Specifically:

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<sup>1</sup>The World Bank's fiscal year begins July 1st. All references to fiscal years in this report are World Bank fiscal years, unless otherwise noted.

<sup>2</sup>The MCA dataset covers World Bank fiscal years 2001 – 2016, and only includes contracts that required additional World Bank review and approval, a process known as prior review. As a result, data from FY 2016 and earlier lack information on an unknown number of contracts. During the course of our review, the World Bank changed the name of the MCA dataset to Contract Awards in IPF (since FY2001 – FY 2016). We refer to the dataset as MCA to differentiate it from the Contract Awards in IPF dataset that includes fiscal years 2017 onward.

<sup>3</sup>The Contract Awards in IPF dataset covers World Bank fiscal years 2017 onward. The dataset's source is the STEP. According to World Bank officials, they began transitioning borrowers to STEP in FY 2017, and all borrowers used STEP beginning in FY 2019. As a result, data from FYs 2017 to 2018 lack information on an unknown number of contracts.

- **Lack of collection and reporting of all beneficial ownership information.** The World Bank does not collect and report the beneficial ownership information of all businesses that were awarded contracts, such as details of the business's ownership structure that may indicate if the business is owned, in part, by other foreign entities. Borrowers record the country of registration of contract awardees in STEP, which may not take into account such issues as beneficial ownership, multi-national corporate structures, joint ventures, or other considerations that may affect determinations of nationality and ownership. While the World Bank requires that borrowers collect and publicly report beneficial ownership information of some contract awardees, that information is collected for a sub-set of all contract awardees, and is not available in a public, consolidated dataset.<sup>4</sup> As a result, the number of contracts and contract dollars attributed to businesses in specific countries may be over or underestimated.
- **Lack of collection of subcontract award data.** The World Bank does not require borrowers to report subcontract awards. As a result, the number of contracts and contract dollars attributed to businesses in specific countries may be over or underestimated if part of the contract was subcontracted to an entity with a business address in a different country from the contract awardee.

Additionally, during our review, we identified a number of inconsistencies with the MCA and Contract Awards in IPF datasets, some of which the World Bank subsequently corrected. Specifically:

- **Datasets are regularly updated.** The World Bank regularly updates the IPF dataset, including backfilling entries, and, as a result, the data changes over time. World Bank officials told us the Contract Awards in IPF dataset is updated daily, and that previously published data may change due to amendments to prior contracts. As a result, we selected the datasets available as of November 1, 2022 to perform

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<sup>4</sup>According to the World Bank, beneficial ownership refers to the person who ultimately owns or controls a company, or who materially benefits from the assets held by a company. In 2017, the World Bank launched a beneficial ownership reporting pilot program. The program required borrowers to publish beneficial ownership information for contracts that met certain thresholds. As of FY 2021, beneficial ownership information was disclosed for nine eligible, awarded contracts with combined contract dollars of about \$1.9 billion according to World Bank documentation. According to the World Bank, in FY 2022 there were 38 ongoing procurements that are subject to the pilot, accounting for around \$5.8 billion in contract dollars. In FY 2023, the World Bank expanded the pilot to include all internationally advertised contracts. Under the initial and expanded pilot, beneficial ownership is reported in individual project documentation and is not reported in the World Bank's public data on borrower contract awards.



our review. Similar analysis using different datasets may yield different results.

- **Some data overlapped between the datasets.** During the course of our work, the World Bank began publishing two datasets on borrower contract awards with overlapping periods, and we identified inconsistencies where the datasets overlapped. When we began our work in November 2021, the World Bank only published the MCA dataset, which covered prior-reviewed contracts from FY 2001 onward. Later, the World Bank separately published the Contract Awards in IPF dataset, which covered all contract awards entered into STEP by borrowers for FY 2017 onward. We identified that the datasets duplicated many contract awards for the overlapping period, but that some contract awards in the MCA dataset did not appear in the Contract Awards in IPF dataset. World Bank officials told us the discrepancy was due to changes in data that were only updated in one of the two datasets. Subsequently, the World Bank revised the datasets to cover distinct periods with no overlap.
- **Some data were missing or unreadable.** Some contract award records had missing or unreadable data. The World Bank requires borrowers to enter data into STEP, but the World Bank does not guarantee the accuracy of data entered by borrowers. World Bank officials told us that borrowers are responsible for the accuracy of data entered into STEP, and that the World Bank verifies borrower data for prior-reviewed contracts.
- **Some data were inconsistent.** Some contract award records had conflicting data. For example, during our review we identified conflicting data for the “country” and “country code” of contract awardees. Specifically, for a single “country” there were multiple corresponding two-digit “country codes.”<sup>5</sup> World Bank officials told us this mismatch was an oversight. Subsequently, the World Bank revised the datasets so that the “country” and “country code” aligned for all contract awards. Additionally, we identified a number of non-United Nations contract awardees associated with a United Nations-specific procurement method. World Bank officials told us that STEP does not have a control to prevent borrowers from assigning the United Nations-specific procurement method to non-United Nations procurements, and they planned to address the issue in the future.
- **Some data were not published.** The datasets did not report contract awards to joint ventures with two or more businesses. World Bank

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<sup>5</sup>In the Contract Awards in IPF dataset, the “country” is the full name of the country, while the “country code” is a standard two-digit code assigned by the World Bank.

officials told us this was an oversight. Subsequently, the World Bank revised the IPF dataset so that a single contract award number may have multiple entries with different contract awardees.

Based on our review, and subsequent corrections made by the World Bank, we found these data to be sufficiently reliable for summarizing data on World Bank borrower contract awards and comparing World Bank borrower contract awardees against entities on selected U.S. sanctions or other lists of parties of concern.

Because our scope for both objectives encompassed FYs 2013 through 2022, we combined the MCA and Contract Awards in IPF datasets. To accomplish this, we downloaded both datasets from the World Bank's web site on November 1, 2022 and combined them with the assumption that the IPF "Supplier Contract Amount (USD)" field was equivalent to the MCA "Total Contract Amount (USD)" field.

In some cases, we inferred information on supplier and borrower country codes based on country names in the data. To ensure compatibility with U.S. State Department country codes, in some cases we edited the World Bank's country codes.<sup>6</sup> We used supplier and borrower codes to determine whether each contract was a 'domestic' or 'self-award'—in other words, an award where the borrower country and supplier country were the same.

In order to examine the extent to which World Bank borrowers awarded contracts to businesses in the U.S. compared to businesses in other countries, for FYs 2013 through 2022 we performed various calculations on the combined datasets using a number of variables including borrower country, country of contract awardee (i.e. supplier), number and amount of awarded contracts, and the procurement category.<sup>7</sup> For example, we summed the number and dollar value of contracts awarded to different supplier countries. We also performed additional analysis on the combined data and summary outputs, as needed.

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<sup>6</sup>Edited codes included those for the Democratic Republic of the Congo (Congo-Kinshasa, "CD"), the Democratic Republic of Timor-Leste ("TL"), the Republic of Serbia ("RS"), and the Republic of Yemen ("YE").

<sup>7</sup>The World Bank's datasets include both the fiscal year of each contract award, as well as the date the contract was signed. We limited our analysis to contract awards with a reported FY between 2013 and 2022.

Additionally, we requested and the World Bank provided summary data from STEP on how many contracts businesses in the U.S. successfully bid on from FY 2017 to October 13, 2022. Based on our review of the World Bank's Contract Awards in IPF dataset, as well as controls related to STEP, we found these data to be sufficiently reliable for presenting the World Bank's summary of bid data for businesses in the U.S., as well as our analysis of that summary data.

Further, we reviewed World Bank documents, including summaries of data limitations published on the World Bank's website, and reviews of borrower-implemented procurement performed by the World Bank and the World Bank Group. We also interviewed World Bank officials regarding the World Bank's policies and procedures for borrower-implemented procurement.

To examine the extent to which World Bank borrowers awarded contracts to entities that may have been on selected U.S. sanctions or other lists of parties of concern, and what actions, if any, Treasury took in response, we first identified and reviewed various selected sanctions lists and other lists of parties of concern to the U.S. government that are managed by federal agencies.<sup>8</sup> We considered whether each list was: (1) public; (2) relevant to U.S. national security or foreign policy interests; (3) related to commercial, subnational entities (such as individuals and businesses); and (4) whether there were any significant limitations to the data, such as availability. Based on our review, we selected the Treasury Office of Foreign Assets Control (OFAC) Specially Designated Nationals And Blocked Persons List (SDN) and Consolidated Sanctions List (Non-SDN), the General Services Administration System for Awards Management (SAM) Exclusions List, the Commerce Bureau of Industry and Security (BIS) Entity, Unverified, and Military End User (MEU) lists, and the

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<sup>8</sup>Specifically, we identified and reviewed: (1) the Department of the Treasury (Treasury) Office of Foreign Assets Control (OFAC) (a) Specially Designated Nationals And Blocked Persons List (SDN) and (b) Consolidated Sanctions List (Non-SDN); (2) the Department of State Directorate of Defense Trade Controls (a) Country Policies and (b) Debarred Parties; (3) the General Services Administration (a) System for Awards Management (SAM) Exclusions List and (b) Federal Awardee Performance and Integrity Information System; (4) the Department of Commerce International Trade Administration (a) Consolidated Screening List and the Bureau of Industry and Security (BIS) (b) Entity List, (c) Unverified List, (d) Military End User (MEU) List, and (e) Denied Persons List; and (5) the Federal Communications Commission List of Equipment And Services Covered By Section 2 of The Secure Networks Act (Covered List). The Federal Communications Commission Covered List is a list of equipment and services produced by specific entities, and our analysis of that list focused on those entities' names.

Federal Communications Commission List of Equipment And Services Covered By Section 2 of The Secure Networks Act (Covered List).<sup>9</sup> In order to capture entities that may have been added to or removed from each list, we included historical versions of or records of changes to the lists in our analysis and data reliability testing. We assessed the reliability of these data by reviewing the data for internal consistency; examining them for duplicate entries, gaps, and obvious errors; and reviewing written comments provided by Treasury and Commerce officials about their data maintenance and publication procedures.<sup>10</sup> Based on our review, we found these data to be sufficiently reliable for identifying search strings and related information to compare against World Bank contract awardees. We limited our scope for this analysis to calendar years 2017 to 2021.<sup>11</sup>

To compile names of currently listed OFAC entities, we downloaded machine-readable versions of the SDN List and Non-SDN List. We identified search strings based on the “firstName” and “lastName” data elements. For records with both a “firstName” and “lastName” data element, we identified search strings based on both combinations of the data elements (firstName + lastName, and lastName + firstName). We also checked for the presence of and identified search strings based on ‘also known as’ (AKA) records.

Historical OFAC listings are not available in standard machine-readable formats, but they are published in the form of semi-structured text files on

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<sup>9</sup>We reviewed the SAM Exclusions List as of March 8, 2022. As of that date, the majority of entities and individuals in the SAM Exclusions List are identified as located in the U.S. We limited our use of the SAM Exclusions List to those entities and individuals identified with a non-U.S. location.

<sup>10</sup>We did not interview General Services Administration officials as part of this engagement. However, we performed manual data testing on the exclusions list data, and reviewed data reliability testing performed by other GAO teams on SAM and determined, based on that testing, that the data was sufficiently reliable for our purposes. Additionally, we did not interview Federal Communications Commission officials. However, the Covered List was created in March 2021 and consisted of five entries during CY 2021, which we manually reviewed and determined the data was sufficiently reliable for our purposes.

<sup>11</sup>We limited our analysis to contract awards with a reported FY of 2017 and later, and a contract signing date between calendar year 2017 to 2021.

Treasury's web site.<sup>12</sup> Using regular expressions and a variety of other programmatic methods, we identified and downloaded each text file and attempted to parse the text.<sup>13</sup> Specifically, we:

- attempted to parse sections of the raw text indicating entity removals from the SDN or another list;
- attempted to parse individual line items within each list removal section;
- attempted to parse the names of listed entities within each line item.

Current and historical versions of the SAM Exclusions List are available via the public SAM web site. We downloaded or queried versions of the data that covered the time period in-scope for this engagement, and programmatically read them to compile names for entities with a listed country other than the U.S. As with the OFAC lists, we identified individuals' names with surnames written first as well as names with surnames written last.

The BIS Entity List, Unverified List, and MEU List, including archival versions, are all available in machine-readable formats via the Electronic Code of Federal Regulations web application programming interface (API).<sup>14</sup> We compiled current and historical versions of entity names on all three lists by:

- downloading current Electronic Code of Federal Regulations page data to obtain a list of change dates for each list;
- creating and running an API call for each change date and parsing the raw data for machine-readable strings of text; and
- parsing each string of text to identify likely entity names.

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<sup>12</sup>Archival changes to the SDN List and Non-SDN Lists are available in PDF and TXT files at: <https://ofac.treasury.gov/specially-designated-nationals-list-sdn-list/archive-of-changes-to-the-sdn-list>.

<sup>13</sup>Due to limitations in the structure of the data, we attempted to parse each substring using multiple parsing strategies to maximize the likelihood of identifying the correct entity names and associated countries.

<sup>14</sup>15 C.F.R. Part 744 Supplement No. 4 contains the Entity List, Supplement No. 6 contains the Unverified List, and Supplement No. 7 contains the Military End-User List. Date-specified versions of the list can be accessed through [ecfr.gov](https://ecfr.gov) via API in XML format.

As with OFAC data, we attempted to parse the data in order to compile individuals' names with surnames written first as well as names with surnames written last. We also compiled AKA names.

After we compiled all of these entity names along with those appearing on the Federal Communications Commission's Covered List, we combined them into a single dataset. In order to maximize the traceability of entity names to World Bank supplier labels, we eliminated commonly abbreviated or commonly translated segments of entities' names. For example, if the end of an entity's name contained the substrings 'Inc.' or 'Ltd.' or 'Incorporated', we omitted those substrings for the purposes of our programmatic matching process.

In order to compare country codes across the U.S. government and World Bank data, for each entity identified in the U.S. government combined data, we attempted to identify a country or countries and assign a standard two-digit country code. For each entry in the World Bank data, we similarly assigned a standard two-digit country code based on the World Bank supplier country code. When identifying matches in World Bank supplier data, we used this country data to rank matches according to higher or lower confidence. We searched each World Bank supplier name for each entity name compiled from the U.S. government sources, using the entity names as substrings. For example, attempting to match the entity "Alpha Beta Corp." to a World Bank contract award to the "Alpha Beta Gamma Corporation" would have produced a potential positive match.

Where we found a name and country match across both datasets, we listed the potential match as "higher" confidence. Where we found only a name match, we listed the potential match as "lower" confidence.

To minimize lower confidence matches, we eliminated potential matches from our output based on various criteria:

- We omitted potential matches on company or organization names that were five characters or fewer.
- We omitted potential matches on other names that were two characters or fewer.

- We also omitted potential matches on a small number of names that produced very high numbers of false positive matches on World Bank supplier data.<sup>15</sup>

Because of the imprecise nature of our programmatic analysis, we did not depend on it for the purposes of this report's findings. We manually reviewed all programmatically flagged potential matches to ascertain their accuracy. Our programmatic output included a list of 'higher' and 'lower' confidence matches, as well as selected information from the source datasets.

For those potential matches where our programmatic review identified a potential match based on the name of the entity, but was unable to identify an associated country from the selected U.S. sanctions or other list of parties of concern, we first reviewed the source list to determine if an associated country for that entity existed. If we were able to manually identify an associated country, we added that country (or countries) to our analysis and manually determined whether the country of the contract awardee matched the country of the entity on a selected U.S. sanctions or other list, and therefore whether the potential match required additional review. If we were unable to identify an associated country, we reviewed the source material for alternative names for the entity and determined whether those alternative names were included in our analysis of potential matches. If the alternative names were included in our analysis and had no match identified based on their name, we excluded those results.<sup>16</sup> In addition, we manually tested a sample of other potential results to verify that the programmatic review accurately captured country information from selected U.S. sanctions and other lists.

We manually reviewed each potential match to determine the likelihood of whether the name of the World Bank borrower contract awardee matched the name of the entity on a selected U.S. sanctions or other list of parties of concern. We developed codes on the likelihood of whether the name of the World Bank borrower contract awardee matched the name of the

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<sup>15</sup>For example, we omitted 'TAN' from our analysis, an acronym for a company on OFAC's SDN list. While matching this acronym to World Bank supplier records, it returned low-confidence matches to many records where the World Bank had awarded contracts to 'Individual Consultant' suppliers.

<sup>16</sup>Several search strings excluded in this manner were three to five letter acronyms of organizations. In one instance, the source for an individual did not include any country information. In one instance, the organization's name did not otherwise appear in our analysis, and we performed additional research to determine the countries in which it operates.

entity on a selected U.S. sanctions or other list that ranged from a direct name match to no overlap between the names. Two analysts independently coded each potential match. The analysts then compared their coding and reconciled any initial disagreements.

For those potential results identified as direct name matches or substantial name overlap between the World Bank contract awardee and the entity on a selected U.S. sanctions or other list of parties of concern, we performed additional analysis to determine the dates that each entity was added to or removed from each respective list. If a World Bank contract awardee received a contract award at a time when the potential matched entity was not on a selected U.S. sanctions or other list, we excluded it from our review.

We could not confirm that the contract awardees were the same entities identified on selected U.S. lists because additional identifying information needed to make a positive identification—such as beneficial ownership information, addresses, national documentation numbers, or dates of birth—is not included in the World Bank’s public data on borrower contract awards. We also provided the results of our analysis to Treasury, Commerce, and the World Bank, and incorporated their responses in our report.<sup>17</sup>

We conducted this performance audit from November 2021 to May 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>17</sup>Treasury’s Office of International Affairs and Office of Foreign Assets Control and Commerce’s International Trade Administration provided responses.



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# Appendix II: World Bank Borrower Contract Awards to Entities that May Have Been on Selected U.S. Sanctions and Other Lists

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To examine the extent to which World Bank borrowers awarded contracts to entities that may have been on selected U.S. sanctions and other lists of parties of concern, we conducted automated matching analysis combined with a manual review of the results of the automated matching.<sup>1</sup> First, we compiled a list of names and the associated countries of entities on selected U.S. sanctions and other lists of parties of concern.<sup>2</sup> Subsequently, we compared those entity names and associated countries with the contract awardee names and countries of registration from World Bank borrower contract award data. For those results identified by our analysis, we manually reviewed each match to determine the extent to which the names overlapped. For those matches where we determined the names significantly overlapped, we further reviewed whether the World Bank contract awardee was awarded a contract while the entity with a similar name was on a U.S. list.

Our analysis provides an indication that a contract was awarded to an entity that may have been on a U.S. list, but cannot confirm it. Our analysis is based on publicly available information, and the potential matches we identified are based on names and their associated countries. While we took steps to eliminate false matches, the World Bank's data do not include other identifying information that could provide greater assurance of a match, such as beneficial ownership information, addresses, national documentation numbers, or dates of birth. Without such identifying information, our analysis cannot positively identify whether a World Bank borrower contract awardee is the same entity as on a U.S. sanctions or other list of parties of concern.

Our analysis reviewed the approximately 150,000 contracts World Bank borrowers awarded from calendar years 2017 through 2021, representing

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<sup>1</sup>To automatically flag records for review, we created an automated system for identifying and flagging World Bank contract awardees, the names of which (1) either partially or fully matched entities on selected U.S. sanctions or other lists of parties of concern and (2) were associated with the same country or countries as entities on U.S. lists. We then manually reviewed the high-confidence matches to determine accuracy. For example, attempting to match the entity "Alpha Beta Corp." to a World Bank contract award to the "Alpha Beta Gamma Corporation" would have produced a potential positive match. Subsequently, we manually reviewed each potential match.

<sup>2</sup>Specifically, we selected the Treasury Office of Foreign Assets Control (OFAC) Specially Designated Nationals And Blocked Persons List (SDN) and Consolidated Sanctions List (Non-SDN), the General Services Administration System for Awards Management (SAM) Exclusions List, the Commerce Bureau of Industry and Security (BIS) Entity, Unverified, and Military End User (MEU) lists, and the Federal Communications Commission List of Equipment And Services Covered By Section 2 of The Secure Networks Act.

approximately \$80 billion in contract dollars. We identified 28 contracts that World Bank borrowers awarded to entities that may have been on selected U.S. sanctions and other lists, representing around \$76 million in contract dollars.<sup>3</sup> Some entities appeared on multiple lists maintained by different U.S. agencies.

We contacted Treasury, Commerce, and the World Bank to see if they were aware of these awards and could provide any additional information or explanations that we should consider. Treasury officials told us that Treasury is not responsible for individual borrower contract awards, nor are they able to monitor those awards, which occur after the World Bank's board approves a project. However, those officials noted that when they become aware of a contract award that may be of concern, they seek an explanation from the World Bank to determine whether any action should be taken.

Commerce officials told us they had no comments on the specific awards that we identified. An International Trade Administration official noted that monitoring awards would be challenging because the World Bank does not publish bid data in a public, consolidated dataset, and contract award data may not be published until up to a year after the contract is finalized. As a result, officials using World Bank contract award data could only monitor contracts after the contracts are awarded.

Treasury provided additional details on two of the 15 contracts that, per our analysis, were awarded to entities that may have been on OFAC sanctions lists. For one contract awardee whose name matched a sanctioned entity except for a single word, Treasury stated that the related sanctions program does not apply to subsidiaries. For the other contract awardee, Treasury noted that the individual who is the potential match on the sanctions list is currently incarcerated in the U.S. Additionally, the World Bank provided comments on all 15 of these contract awards. Specifically, the World Bank noted that:

- For six contracts, the borrower established an alternative payment arrangement in order to pay the contract awardee. According to the World Bank, borrowers may make alternative payment arrangements if the World Bank identifies that the potential contract awardee is on a

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<sup>3</sup>The contract awards that we identified represent around .02 percent of the total number of contracts, and .1 percent of the total contract value we reviewed.

**Appendix II: World Bank Borrower Contract Awards to Entities that May Have Been on Selected U.S. Sanctions and Other Lists**

sanctions list used in the World Bank's screening and the World Bank will not be able to issue a direct payment to the potential awardee.

- For five contracts, according to the World Bank's assessment, the contract awardee was not the same entity that appeared on an OFAC sanctions list.
- For four contracts, the World Bank screened the contract awardee against OFAC sanctions lists and did not identify a match.

The results of our analysis may be found in Tables 3 through 5. Treasury and the World Bank's responses are included in the notes to the tables, where appropriate. Due to concerns with disclosing personally identifiable information, and the common nature of many names identified in our analysis, we are not publishing specific information relating to seven contract awards to six individuals.

**Table 3: World Bank Borrower Awards to Entities That May Have Been on OFAC Sanctions Lists**

World Bank Contract Awardee Name	World Bank Contract Awardee Country	Date of Award	OFAC Entity Name	OFAC Entity Country	OFAC List/Program and Related Dates	World Bank Borrower Country	Contract Description	Contract Award Amount
China National Chemical Economic and Technical Development Centre <sup>a</sup>	China	04/06/2021	China National Chemical Corp Ltd.	China	CCMC <sup>f</sup> Listing date: 11/12/2020 Effective date: 01/11/2021 Date removed: 06/03/2021	China	Investigation on Feedstock Applications of HCFCs in 2019-2022	\$262,863.01
Individual 1 <sup>b,c</sup>	Serbia	2020 <sup>b</sup>	Individual 1 <sup>b</sup>	Serbia	SDN/GLOMAG <sup>g</sup> Listing date: 2019 <sup>b</sup>	Serbia	Consultant Services <sup>b</sup>	Appx. \$100,000 <sup>b</sup>

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<b>World Bank Contract Awardee Name</b>	<b>World Bank Contract Awardee Country</b>	<b>Date of Award</b>	<b>OFAC Entity Name</b>	<b>OFAC Entity Country</b>	<b>OFAC List/Program and Related Dates</b>	<b>World Bank Borrower Country</b>	<b>Contract Description</b>	<b>Contract Award Amount</b>
Xinjiang Corps 4th Construction Engineering (Group) Co. Ltd <sup>d</sup>	China	04/02/2021	Xinjiang Production and Construction Corps	China	SDN/GLOMAG <sup>g</sup> Listing date: 07/31/2020	China	Ximen River disaster shelter square: A total of 21,600m2, with the supporting construction of emergency access, disaster prevention equipment and facilities etc.; The reconstruction of Zifu Road.	\$7,160,996.16
Individual 2 <sup>b,c,e</sup>	Pakistan	2020 <sup>b</sup>	Individual 2 <sup>b</sup>	Pakistan	SDN/SDGT <sup>h</sup> Listing date: 2003 <sup>b</sup>	Pakistan	Consultant Services <sup>b</sup>	Appx. \$5,000 <sup>b</sup>
CCCC Road and Bridge Construction Co., Ltd <sup>d</sup>	China	03/15/2021	China Communications Construction Company Limited; CCCC	China	CCMC <sup>f</sup> Listing date: 11/12/2020 Effective date: 01/11/2021 CMIC <sup>f</sup> Effective Date: 08/02/2021	China	city around metro stations connection sub- project (B-6)	\$6,834,841.65
China Mobile Communications Group Jiangsu Co., Ltd. <sup>a</sup>	China	11/30/2021	China Mobile Communications Group CO., LTD.	China	CMIC <sup>f,i</sup> Listing date: 06/03/2021 Effective Date: 08/02/2021	China	SMART water system (C)	\$5,553,136.56
Individual 3 <sup>b,d</sup>	Pakistan	2020 <sup>b</sup>	Individual 3 <sup>b</sup>	Pakistan	SDN/SDGT <sup>h</sup> Listing date: 2011 <sup>b</sup>	Pakistan	Goods <sup>b</sup>	Appx. \$2,500 <sup>b</sup>
Individual 3 <sup>b,d</sup>	Pakistan	2019 <sup>b</sup>	Individual 3 <sup>b</sup>	Pakistan	SDN/SDGT <sup>h</sup> Listing date: 2011 <sup>b</sup>	Pakistan	Civil Works <sup>b</sup>	Appx. \$35,000 <sup>b</sup>
Individual 4 <sup>b,c</sup>	Pakistan	2018 <sup>b</sup>	Individual 4 <sup>b</sup>	Pakistan	SDN/SDGT <sup>h</sup> Listing date: 2014 <sup>b</sup>	Pakistan	Consultant Services <sup>b</sup>	Appx \$15,000 <sup>b</sup>

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<b>World Bank Contract Awardee Name</b>	<b>World Bank Contract Awardee Country</b>	<b>Date of Award</b>	<b>OFAC Entity Name</b>	<b>OFAC Entity Country</b>	<b>OFAC List/Program and Related Dates</b>	<b>World Bank Borrower Country</b>	<b>Contract Description</b>	<b>Contract Award Amount</b>
China National Electronics Import & Export Corporation (CEIEC) <sup>a</sup>	China	08/23/2021	China National Electronics Import and Export Corporation (CEIEC)	China	SDN/Venezuela <sup>j</sup> Listing date: 11/30/2020	Bangladesh	Procurement of ICT Equipment for NDRCC / NDMRTI under DDM	\$1,025,967.50
China National Electronics Import & Export Corporation (CEIEC) <sup>a</sup>	China	03/28/2021	China National Electronics Import and Export Corporation (CEIEC)	China	SDN/Venezuela <sup>j</sup> Listing date: 11/30/2020	Bangladesh	Procurement of ICT Equipment for Emergency Operation Centre (EOC) at DSCC and SCC	\$2,846,840.60
China National Electronics Import & Export Corporation (CEIEC) <sup>a</sup>	China	03/28/2021	China National Electronics Import and Export Corporation (CEIEC)	China	SDN/Venezuela <sup>j</sup> Listing date: 11/30/2020	Bangladesh	Procurement of ICT Equipment for Command Control Room (CCR) at FSCD, Dhaka and FSCD, Sylhet	\$2,659,229.65
China National Electronics Import & Export Corporation (CEIEC) <sup>a</sup>	China	01/03/2021	China National Electronics Import and Export Corporation (CEIEC)	China	SDN/Venezuela <sup>j</sup> Listing date: 11/30/2020	Bangladesh	Procurement of ICT Equipment for Command Control Room (CCR) at FSCD, Dhaka and FSCD, Sylhet	\$1,243,823.65
Individual 5 <sup>b,c</sup>	Pakistan	2019 <sup>b</sup>	Individual 5 <sup>b</sup>	Pakistan	SDN/SDGT <sup>h</sup> Listing date: 2010 / 2012 <sup>b,k</sup>	Pakistan	Consultant Services <sup>b</sup>	Appx. \$5,000 <sup>b</sup>
Meamar Group <sup>c</sup>	Lebanon	02/01/2021	Meamar SARL	Lebanon	SDN/SDGT <sup>h</sup> Listing date: 09/17/2020	Lebanon	Rehabilitation of COVID-19 ICU Unit	\$190,890.62

Source: GAO analysis of World Bank and U.S. Department of the Treasury (Treasury) Office of Foreign Assets Control (OFAC) data. | GAO-23-105543

Notes: We programmatically and manually compared the names of World Bank borrower contract awardees from the World Bank's borrower contract award data against entities on selected U.S. sanctions and other lists of parties of concern for the period calendar year 2017 to 2021. We limited the comparison to contract awardees and entities on U.S. lists with the same associated country. The entries in this table represent the names of contract awardees and entities on U.S. lists that we determined had substantial or complete overlap. We further reviewed each contract awardee and entity to determine whether the entity was listed at the time the World Bank borrower awarded the contract.

Our analysis does not positively identify whether a contract was awarded to an entity on a selected U.S. sanctions or other list of parties of concern. Our analysis is based on publicly available

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**Appendix II: World Bank Borrower Contract  
Awards to Entities that May Have Been on  
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information, and the potential matches we identified are based only on names and associated countries. The World Bank's borrower contract award data do not include other identifying information that could be used to provide assurance of a match, such as beneficial ownership information, addresses, national documentation numbers, or dates of birth. Entities may appear on multiple U.S. lists at the same time.

According to World Bank officials, the World Bank screens contract award recommendations by borrowers through its Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT) and Sanction Screening Procedure. Those officials told us that the AML/CFT policies and procedures include screening against U.S. sanctions lists, among others. If the World Bank identifies an award recommendation to an entity that is on a sanctions list used in the World Bank's screening, the World Bank informs the borrower that 1) the World Bank is not able to issue a direct payment (on behalf of the borrower) to a potential contract awardee, and 2) the borrower may not be able to process the payment themselves. The borrower may make arrangements to pay the potential contract awardee. If the borrower cannot make arrangements, the borrower may request to revise its recommendation for the contract award and award the contract to the next-ranked bidder.

<sup>a</sup>According to the World Bank, the borrower made alternative payment arrangements for the contract awardee.

<sup>b</sup>Due to concerns with disclosing personally identifiable information and the common nature of many names identified in our analysis, we are not publishing specific information relating to individuals that were awarded contracts. In our report, we refer to individuals as Individual 1 through Individual 6, which represent the six unique individuals we identified.

<sup>c</sup>According to the World Bank, the contract awardee was screened against sanctions lists, and appeared to match a name on one of the lists, but additional due diligence determined the contract awardee was not the same entity as the sanctions list. We did not evaluate the World Bank's AML/CFT policies and procedures, or how the World Bank screens contract awardees against sanctions lists.

<sup>d</sup>According to the World Bank, the contract awardee was screened against sanctions lists and did not match any of the names on the lists. We did not evaluate the World Bank's AML/CFT policies and procedures, or how the World Bank screens contract awardees against sanctions lists.

<sup>e</sup>According to Treasury, the potentially matched individual who was designated on the SDN list in 2003 is currently incarcerated in the United States.

<sup>f</sup>Executive Order 13959, as amended, prohibited U.S. investors from purchasing for value, selling, or possessing after a certain date, securities of a "Communist Chinese military company" (CCMC), a term that included those identified by the Secretary of Defense pursuant to Section 1237 of the National Defense Authorization Act for Fiscal Year 1999, as amended, as well as those identified by the Secretary of the Treasury as meeting the criteria under Section 1237(b)(4)(B) of the National Defense Authorization Act for Fiscal Year 1999. Addressing the Threat From Securities Investments That Finance Communist Chinese Military Companies, Exec. Order No. 13959 (2020) (as amended by Amending Executive Order 13959, Addressing the Threat From Securities Investments That Finance Communist Chinese Military Companies, Exec. Order No. 13974 (2021)). Executive Order 14032 of June 3, 2021 partially superseded and further amended Executive Order 13959, including by revocation of Executive Order 13974, to prohibit U.S. persons from purchasing or selling securities (or their derivatives, or securities designed to provide investment exposure to such securities) of any person listed in the annex to that order or whom the Secretary of the Treasury has determined (1) to operate or have operated in the defense and related materiel sector or the surveillance technology sector of the economy of the PRC, or (2) to own or control, or to be owned or controlled by, directly or indirectly, a person who operates or has operated in any of those sectors, or a person who is listed in the Annex to the order or who has otherwise been determined to be subject to the prohibitions on transacting in securities. Such persons are identified by Treasury as Chinese Military-Industrial Complex Companies (CMICs). Addressing the Threat From Securities Investments That Finance Certain Companies of the People's Republic of China, Exec. Order No. 14032 (2021). According to Treasury these sanctions are narrower than those that apply to persons identified on OFAC's Specially Designated Nationals and Blocked Persons (SDN) List and do not prohibit U.S. persons, for example, from engaging in commercial purchases or sales in goods or services that are unrelated to securities issued by CMICs.

<sup>g</sup>The Global Magnitsky Human Rights Accountability Act authorizes the U.S. government to sanction foreign persons who (1) are responsible for gross violations of human rights, (2) acted as an agent of a foreign person responsible for a gross violation of human rights in specific matters, (3) are

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government officials involved in significant acts of corruption, or (4) have materially assisted a government official in a significant act of corruption. 22 U.S.C. § 2656 note. Executive Order 13818 of December 20, 2017 implements this authority by imposing financial and visa restrictions on individuals and entities designated as complicit in or directly engaged in certain human rights abuses or corrupt acts, known as Global Magnitsky Sanctions (GLOMAG). Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption, Exec. Order No. 13818 (2017).

<sup>b</sup>The Global Terrorism Sanctions Regulations (31 C.F.R. Part 594) allows the U.S. government to block property and prohibit dealings with individual and entities designated as a specially designated global terrorist (SDGT).

<sup>i</sup>According to Treasury, CMIC sanctions do not apply to publicly traded securities issued by subsidiaries of entities on the NS-CMIC List unless those subsidiaries are independently listed. While China Mobile Communications Group Co., Ltd. is listed on the NC-CIMC List, China Mobile Communications Group Jiangsu Co., Ltd. is not.

<sup>j</sup>Executive Order 13692 of March 8, 2015, as amended, allows the U.S. government to block property and prohibit dealings with individuals and entities that are specifically listed or are designated as responsible for or complicit in (1) actions or policies that undermine democratic processes or institutions; (2) significant acts of violence or conduct that constitutes a serious abuse or violation of human rights, including against persons involved in antigovernment protests in Venezuela in or since February 2014; (3) actions that prohibit, limit, or penalize the exercise of freedom of expression or peaceful assembly; or (4) public corruption by senior officials within the Government of Venezuela, among other criteria. Blocking Property and Suspending Entry of Certain Persons Contributing to the Situation in Venezuela, Exec. Order No. 13692 (2015) (as amended by Taking Additional Steps To Address the National Emergency With Respect to Venezuela, Exec. Order No. 13857 (2019)).

<sup>k</sup>There are two entries for individuals with the same alias, each with a different listing date.

**Table 4: World Bank Borrower Awards to Entities That May Have Been on BIS Lists**

World Bank Contract Awardee Name	World Bank Contract Awardee Country	Date of Award	BIS Entity Name	BIS Entity Country	BIS List and Related Dates	World Bank Borrower Country	Contract Description	Contract Award Amount
Huawei Consortium	China	10/30/2020	Huawei Technologies Co., Ltd.	China	Entity List <sup>b</sup> Date added: 05/21/2019	Rwanda	One year renewable remote AMI software maintenance services support contract	\$61,478.00
Huawei International Co. Limited	China	05/22/2020	Huawei Technologies Co., Ltd.	China	Entity List <sup>b</sup> Date added: 05/21/2019	Regional – Eastern and Southern Africa	Contract for provision of connectivity of government entities and target user groups to the government network (NBI) project	\$9,887,017.00
High Tech	Pakistan	01/03/2018	High Technologies, Ltd. (HTL); High Technology, Ltd.	Pakistan	Entity List <sup>b</sup> Date added: 11/19/1998	Pakistan	M/s High Tech for IT Equipment of PIU	\$24,278.64
Renmin University	China	01/08/2020	Renmin University	China	UVL <sup>c</sup> Date added: 04/11/2019 Date removed: 10/09/2020	China	Joint venture of Renmin University and Peking University ranks first in the shortlist.	\$67,911.81

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<b>World Bank Contract Awardee Name</b>	<b>World Bank Contract Awardee Country</b>	<b>Date of Award</b>	<b>BIS Entity Name</b>	<b>BIS Entity Country</b>	<b>BIS List and Related Dates</b>	<b>World Bank Borrower Country</b>	<b>Contract Description</b>	<b>Contract Award Amount</b>
Renmin University	China	06/17/2020	Renmin University	China	UVL <sup>c</sup> Date added: 04/11/2019 Date removed: 10/09/2020	China	The consulting service is to carry out research on improving enrolling mechanism of basic health insurance	\$259,600.00
CCCC Road and Bridge Construction CO., LTD	China	03/15/2021	China Communications Construction Company Ltd. (CCCC)	China	Entity List <sup>b</sup> Date added: 12/22/2020	China	city around metro stations connection sub-project (B-6)	\$6,834,841.65
Beihang University	China	04/02/2021	Beihang University	China	Entity List <sup>b</sup> Date added: 09/16/2005	China	The contract is awarded to Beihang University.	\$49,668.37
IKAN Engineering Services (PVT.) Limited	Pakistan	10/08/2020	IKAN Engineering Services (AKA IKAN Sourcing)	Pakistan	Entity List <sup>b</sup> Date added: 09/18/2014 Date removed: 06/01/2021	Pakistan	Construction of New RCC Bridge at Jalkot Nullah	442,109.07
AVIC International Holding Corporation	China	07/23/2020	Aviation Industry Corporation of China (AVIC) Institute 625	China	Entity List <sup>b</sup> Date added: 05/01/2014	Uganda	Plant design, supply and installation of: Lot 2: 132kV Kole switching station and 132/33kV Gulu substation with associated 33kV interconnection lines	\$10,856,353.64
AVIC International Holding Corporation	China	07/23/2020	Aviation Industry Corporation of China (AVIC) Institute 625	China	Entity List <sup>b</sup> Date added: 05/01/2014	Uganda	Plant design, supply and installation of: Lot 3: 132/33kV Nebbi and Arua substations with associated 33kV interconnection lines	\$7,780,228.74
Individual 6 <sup>a</sup>	Afghanistan	2017 <sup>a</sup>	Individual 6 <sup>a</sup>	Afghanistan	Entity List <sup>b</sup> Date added: 2011	Afghanistan	Consultant Services <sup>a</sup>	Appx. \$10,000 <sup>a</sup>
Tongji University	China	11/21/2019	Tongji University	China	UVL <sup>c</sup> Date added: 04/11/2019 Date removed: 10/09/2020	China	Operation management manual of highway safety management system	\$99,459.45



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World Bank Contract Awardee Name	World Bank Contract Awardee Country	Date of Award	BIS Entity Name	BIS Entity Country	BIS List and Related Dates	World Bank Borrower Country	Contract Description	Contract Award Amount
Poly Technologies Inc.	China	09/26/2017	Poly Technologies, Inc.	China	Entity List <sup>b</sup> Date added: 06/26/2014	Myanmar	Supply, installation, and maintenance of solar PV systems for households and public facilities in L-2-Chin(3),L-5Bago,L-7Mandalay+Naypyitaw,L-9Shan(East-2+North-3),L-10Ayeyarwaddy-3, L-12Ayeyarwaddy(5)	\$4,925,664.61

Source: GAO analysis of World Bank and U.S. Department of Commerce Bureau of Industry and Security (BIS) data. | GAO-23-105543

Notes: According to the World Bank, they do not screen contract awardees against BIS lists. We programmatically and manually compared the names of World Bank borrower contract awardees from the World Bank's borrower contract award data against entities on selected U.S. sanctions and other lists of parties of concern for the period calendar year 2017 to 2021. We limited the comparison to contract awardees and entities on selected U.S. lists with the same associated country. The entries in this table represent the names of contract awardees and entities on selected U.S. lists that we determined had substantial or complete overlap. We further reviewed each contract awardee and entity to determine whether the entity was listed at the time the World Bank borrower awarded the contract.

Our analysis does not positively identify whether a contract was awarded to an entity on a U.S. sanctions or other list of parties of concern. Our analysis is based on publicly available information, and the potential matches we identified are based only on names and associated countries. The World Bank's borrower contract award data do not include other identifying information that could be used to provide assurance of a match, such as beneficial ownership information, addresses, national documentation numbers, or dates of birth. Entities may appear on multiple U.S. lists at the same time.

<sup>a</sup>Due to concerns with disclosing personally identifiable information and the common nature of many names identified in our analysis, we are not publishing specific information relating to individuals that received contracts. In our report, we refer to individuals as Individual 1 through Individual 6, which represent the six unique individuals we identified.

<sup>b</sup>The Entity List identifies persons reasonably believed to be involved, or to pose a significant risk of being or becoming involved, in activities contrary to the national security or foreign policy interests of the United States. 15 C.F.R. § 744.16. It includes names of certain foreign entities that are subject to specific license requirements for the export, reexport and/or transfer (in-country) of specified items. The entities on the Entity List are subject to licensing requirements and policies supplemental to those found elsewhere in the Export Administration Regulations. 15 C.F.R. Part 744, Supp. No. 4.

<sup>c</sup>Foreign persons who are parties to an export, reexport, and transfer (in-country) subject to the EAR may be added to the Unverified List if BIS or federal officials acting on BIS's behalf cannot verify the bona fides (i.e., legitimacy and reliability relating to the end use and end user of items subject to the EAR) of such persons because an end-use check, such as a pre-license check (PLC) or a post-shipment verification (PSV), cannot be completed satisfactorily for reasons outside of the U.S. Government's control. 15 C.F.R. § 744.15. Parties on the Unverified List (UVL) are subject to additional export restrictions and requirements. 15 C.F.R. Part 744, Supp. No. 6.

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Selected U.S. Sanctions and Other Lists**

**Table 5: World Bank Borrower Awards to Entities That May Have Been on the SAM Exclusions List**

<b>World Bank Contract Awardee Name</b>	<b>World Bank Contract Awardee Country</b>	<b>Date of Award</b>	<b>SAM Entity Name</b>	<b>Country of Primary Address</b>	<b>SAM Excluding Agency and Related Dates</b>	<b>World Bank Borrower Country</b>	<b>Contract Description</b>	<b>Contract Award Amount</b>
Huawei Consortium	China	10/30/2020	Huawei Technologies Co., Ltd.	China	Dept. of the Air Force <sup>b</sup> Date added: 02/21/2019	Rwanda	One year renewable remote AMI software maintenance services support contract	\$61,478.00
Huawei International Co. Limited	China	05/22/2020	Huawei Technologies Co., Ltd.	China	Dept. of the Air Force <sup>b</sup> Date added: 02/21/2019	Regional – Eastern and Southern Africa	Contract for provision of connectivity of government entities and target user groups to the government network (NBI) project	\$9,887,017.00
Individual 1 <sup>a</sup>	Serbia	2020 <sup>a</sup>	Individual 1 <sup>a</sup>	Serbia	OFAC <sup>b</sup> Date added: 12/09/2019	Serbia	Consultant Services <sup>a</sup>	Appx. \$100,000 <sup>a</sup>
Xinjiang Corps 4th Construction Engineering (Group) CO. LTD	China	04/02/2021	Xinjiang Production and Construction Corps	China	OFAC <sup>b</sup> Date added: 07/31/2020	China	Ximen River disaster shelter square: A total of 21,600m2, with the supporting construction of emergency access, disaster prevention equipment and facilities etc.; The reconstruction of Zifu Road.	\$7,160,996.16
Individual 2 <sup>a</sup>	Pakistan	2020 <sup>a</sup>	Individual 2 <sup>a</sup>	Pakistan	OFAC <sup>b</sup> Date added: 2012	Pakistan	Consultant Services <sup>a</sup>	Appx. \$5,000 <sup>a</sup>

**Appendix II: World Bank Borrower Contract  
Awards to Entities that May Have Been on  
Selected U.S. Sanctions and Other Lists**

<b>World Bank Contract Awardee Name</b>	<b>World Bank Contract Awardee Country</b>	<b>Date of Award</b>	<b>SAM Entity Name</b>	<b>Country of Primary Address</b>	<b>SAM Excluding Agency and Related Dates</b>	<b>World Bank Borrower Country</b>	<b>Contract Description</b>	<b>Contract Award Amount</b>
Individual 3 <sup>a</sup>	Pakistan	2020 <sup>a</sup>	Individual 3 <sup>a</sup>	Pakistan	OFAC <sup>b</sup> Date added: 2012	Pakistan	Goods <sup>a</sup>	Appx. \$2,500 <sup>a</sup>
Individual 3 <sup>a</sup>	Pakistan	2019 <sup>a</sup>	Individual 3 <sup>a</sup>	Pakistan	OFAC <sup>b</sup> Date added: 2012	Pakistan	Civil Works <sup>a</sup>	Appx. \$35,000 <sup>a</sup>
China National Electronics Import & Export Corporation (CEIEC)	China	08/23/2021	China National Electronics Import and Export Corporation (CEIEC)	China	OFAC <sup>b</sup> Date Added: 11/30/2020	Bangladesh	Procurement of ICT Equipment for NDRCC / NDMRTI under DDM	\$1,025,967.50
China National Electronics Import & Export Corporation (CEIEC)	China	03/28/2021	China National Electronics Import and Export Corporation (CEIEC)	China	OFAC <sup>b</sup> Date Added: 11/30/2020	Bangladesh	Procurement of ICT Equipment for Emergency Operation Centre (EOC) at DSCC and SCC	\$2,846,840.60
China National Electronics Import & Export Corporation (CEIEC)	China	03/28/2021	China National Electronics Import and Export Corporation (CEIEC)	China	OFAC <sup>b</sup> Date added: 11/30/2020	Bangladesh	Procurement of ICT Equipment for Command Control Room (CCR) at FSCD, Dhaka and FSCD, Sylhet	\$2,659,229.65
China National Electronics Import & Export Corporation (CEIEC)	China	03/28/2021	China National Electronics Import and Export Corporation (CEIEC)	China	OFAC <sup>b</sup> Date Added: 11/30/2020	Bangladesh	Procurement of ICT Equipment for Command Control Room (CCR) at FSCD, Dhaka and FSCD, Sylhet	\$1,243,823.65
Individual 5 <sup>a</sup>	Pakistan	2019 <sup>a</sup>	Individual 5 <sup>a</sup>	Pakistan	OFAC <sup>b</sup> Date added: 2012	Pakistan	Consultant Services <sup>a</sup>	Appx. \$5,000 <sup>a</sup>

**Appendix II: World Bank Borrower Contract  
Awards to Entities that May Have Been on  
Selected U.S. Sanctions and Other Lists**

World Bank Contract Awardee Name	World Bank Contract Awardee Country	Date of Award	SAM Entity Name	Country of Primary Address	SAM Excluding Agency and Related Dates	World Bank Borrower Country	Contract Description	Contract Award Amount
Meamar Group	Lebanon	02/01/2021	Meamar SARL	Lebanon	OFAC <sup>b</sup> Date added: 09/17/2020	Lebanon	Rehabilitation of COVID-19 ICU Unit	\$190,890.62
Hytera Communications Corporation Limited	China	05/14/2020	Hytera Communications Corporation Limited	China	GSA <sup>b</sup> Date added: 12/13/2019	Bangladesh	Procurement of Specialized ICT Equipment (VHF DMR [Digital Mobile Radio] Network and Related Installations) for FSCD	\$13,900,050.00

Source: GAO analysis of World Bank and Systems for Awards Management (SAM) data. | GAO-23-105543

Notes: According to the World Bank, they do not screen contract awardees against the SAM exclusions list. We programmatically and manually compared the names of World Bank borrower contract awardees from the World Bank's borrower contract award data against entities on selected U.S. sanctions and other lists of parties of concern for the period calendar year 2017 to 2021. We limited the comparison to contract awardees and entities on selected U.S. lists with the same associated country. The entries in this table represent the names of contract awardees and entities on selected U.S. lists that we determined had substantial or complete overlap. We further reviewed each contract awardee and entity to determine whether the entity was listed at the time the World Bank borrower awarded the contract.

Our analysis does not positively identify whether a contract was awarded to an entity on a U.S. sanctions or other list of parties of concern. Our analysis is based on publicly available information, and the potential matches we identified are based only on names and associated countries. The World Bank's borrower contract award data do not include other identifying information that could be used to provide assurance of a match, such as beneficial ownership information, addresses, national documentation numbers, or dates of birth. Entities may appear on multiple U.S. lists at the same time.

<sup>a</sup>Due to concerns with disclosing personally identifiable information and the common nature of many names identified in our analysis, we are not publishing specific information relating to individuals that were awarded contracts. In our report, we refer to individuals as Individual 1 through Individual 6, which represent the six unique individuals we identified.

<sup>b</sup>SAM reports data from several U.S. agencies, and additional information on the reason for an entity's inclusion on the exclusion is not necessarily available on SAM.

# Appendix III: Comments from the World Bank



EDWARD MOUNTFIELD  
Vice President  
Operations Policy and Country Services

April 17, 2023

Ms. Latesha Love  
Director, International Affairs and Trade  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Love,

*Re: Management Response to Draft Report GAO-23-105543 –  
World Bank Contracting Practices and Processes*

Thank you for the opportunity to comment on this draft report. The World Bank appreciates the work of the U.S. Government Accountability Office (GAO) in planning and conducting its review of World Bank (the Bank) contracting practices and processes.

The United States was a leading force in establishing the International Bank for Reconstruction and Development (IBRD) in 1944 and remains the largest shareholder of the World Bank Group today. As an international organization it is governed by its Articles of Agreement. The Bank upholds a principle of universal/open eligibility, which provides that bidders from all countries are eligible to bid for Bank-financed contracts. Narrowly defined exceptions to this principle apply in the case of entities that are subject to sanctions imposed by the United Nations Security Council under Chapter VII of the Charter of the United Nations as well as those that are specifically suspended or debarred by the Bank pursuant to its prevailing sanctions policies and procedures, including through the cross debarment agreement with other Multilateral Development Banks (MDB).

We are pleased to note GAO's acknowledgment of the reliability of the Bank's contract award data and information systems in capturing and publishing information on contracts awarded by the Bank's Borrowers under the Bank's Investment Project Financing instrument. The Bank's Procurement Framework establishes a strong competitive environment for the procurement market generated by the Bank's investment projects with a level playing field, certainty of process, and the highest integrity and sustainability standards.

The Bank's *Anti-Money Laundering and Countering Financing of Terrorism* policies and procedures include screening against sanctions lists of the U.S. (Office of



Ms. Latesha Love

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April 14, 2023

Foreign Assets Control Specially Designated Nationals and Blocked Persons List (SDN) and Consolidated Sanctions List (Non-SDN)), United Kingdom and European Union. This screening derives from practical concerns, because the majority of Bank payments flow through U.S., UK, and EU banks and these sanctions may affect the ability of Borrowers to pay suppliers. However, the Bank's Articles of Agreement do not permit use of these or other national lists to determine eligibility in the awarding of Bank-financed contracts.

Finally, we note GAO's finding that businesses in the U.S. enjoy a high rate of success when they bid for Bank-financed contracts, winning over 70% of those contracts for which they bid. We assure you of our readiness to work with the U.S. Executive Director, Department of Commerce, and other U.S. agencies to boost participation by U.S. businesses in Bank-financed procurement through our procurement outreach program.

Sincerely,



**Edward Mountfield**  
Vice President, Operations Policy and Country Services

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# Appendix IV: GAO Contact and Staff Acknowledgments

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## GAO Contact

Latesha Love-Grayer, (202) 512-4409, [LoveGrayerL@gao.gov](mailto:LoveGrayerL@gao.gov)

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## Staff Acknowledgments

In addition to the above contact, Ryan Vaughan (Assistant Director), Benjamin L. Sponholtz (Analyst in Charge), Joshua Lanier, Joshua Timko, Delanie Smither, Maureen Luna-Long, Nisha Rai, Larissa Barrett, Neil Doherty, Ashley Alley, Christopher Gresh, Gabriel Nelson, and Terry Richardson made key contributions to this report.

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