TABLE OF CONTENTS

Executive Summary	i
I. Overview of the Project	1
II. Overview of the Participating Agency: Light Rail Transit Authority (LRTA)	2
III. Assessment Methodology and Tools	16
IV. Corruption Resistance Review	
Leadership Code of Conduct Gifts and Benefits Policy Human Resource Management Performance Management Procurement Management Financial Management Whistleblowing, Internal Reporting and Investigation Corruption Risk Management Interface with External Environment Other Survey Results	25 32 37 42 48 56 63 69 74 80 88
V. Corruption Vulnerability Assessment	
 A. Procurement and Warehousing of Spare Parts and Disposal of Waste Materials B. Ticket Production, Selling and Remittance of Sales C. Acquisition of Right of Way 	98 110 120
VI. Summary of Recommendations	129
VII. Conclusion	134
Annexes	
 A. List of IDA Participants B. CVA Matrices Procurement and Warehouseing of Spare Parts for Light Rail Vehicles and Disposal of Waste Material Ticket Production, Selling and Remittance of Sales Acquisition of Right of Way 	Annex A-1 Annex B-1