

CHALLENGING THE FALSE NARRATIVES:

Ukraine's Progress in Combating Corruption

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The perception of Ukraine as a country mired in pervasive corruption has been a persistent narrative in international discourse, effectively utilized and bloated by Russian propaganda. The EU East StratCom Task Force has provided numerous examples of Russian disinformation about corruption in Ukraine. While it is undeniable that Ukraine faces significant corruption challenges, the blanket portrayal of the country as irredeemably corrupt is misleading and underestimates the genuine progress made.

The year 2024 marks a decennium of enhanced and holistic anti-corruption reforms in Ukraine. The country has embarked on the full-fledged journey to curb corruption ever since the Revolution of Dignity in 2013-2014. Local reformers supported by the international community commenced developing and implementing a comprehensive agenda of change. Anti-corruption reforms in Ukraine had their ups and downs, sometimes facing unnecessary delays or resistance. Nevertheless, one can clearly observe a significant transformation that happened over the last decade that includes establishment of anti-corruption institutions but also societal change in a broader sense. A transformation of society in direction to zero tolerance to corruption continues and gained more momentum after Russia's full-scale invasion in February 2022. [92.1% of Ukrainians find corruption one of most serious problems.](#)

This paper counteracts 7 common narratives about corruption in Ukraine, and aims at providing a more nuanced and accurate understanding of the progress and ongoing challenges in Ukraine's fight against corruption.

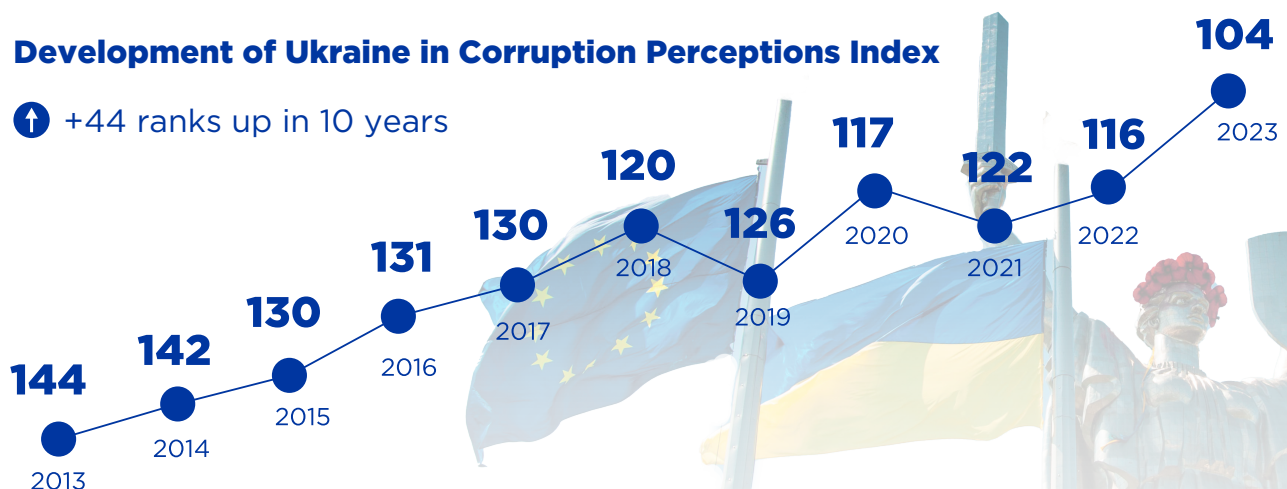
NARRATIVE 1:

"UKRAINE IS INHERENTLY CORRUPT AND UNCHANGEABLE"

The narrative that Ukraine is inherently corrupt and beyond reform is not supported by developments of the last 10 years. Since the 2014 Revolution of Dignity, Ukraine has implemented a series of reforms aimed at combating corruption at various levels. One of the utmost concerns was impunity for high-level corrupt officials. Ukraine had to institute efficient tools to crack down on officials engaged in dishonest practices. In order to enforce criminal legislation against corruption, already harmonized with the UNCAC (United Nations Convention Against Corruption), over the period of 2014-2019

the Ukrainian government created a set of independent specialized anti-corruption institutions of the criminal cycle: National Anti-Corruption Bureau (NABU), Specialized Anti-Corruption Prosecutor's Office (SAPO) and High Anti-Corruption Court (HACC). These agencies enjoy a high level of independence from political interference, their management (and judges) is selected in a transparent manner with the involvement of international experts, and they cover detection, investigation, prosecution, and adjudication of high-level corruption – very different from the criminal persecutions of the past. Members of Parliament, judges, ministers, CEOs of state-owned enterprises and many other high-level officials who in the past were untouchable, are now being investigated, indicted and some are already found guilty by the HACC and convicted to many years behind bars.

While there is no simple way of measuring progress in fighting corruption, the Global Perception Index of Transparency International probably provides the best indicator that exists. While Ukraine was country number 144 out of 180 in 2013, Ukraine is this year number 104 which is even 12 positions better than last year. Ukraine is now on an equal footing with other EU candidate countries.



NARRATIVE 2:

"ANTI-CORRUPTION REFORMS ARE SUPERFICIAL AND INEFFECTIVE"

Critics often claim that Ukraine's anti-corruption reforms are merely cosmetic. However, this overlooks the tangible outcomes achieved by the newly established anti-corruption institutions. For instance, NABU and SAPO have launched numerous investigations into high-profile officials and have secured several convictions. Some of the recent cases include [the alleged bribery of the then-president of the Supreme Court](#) by a Ukrainian businessman; [suspicion of the Minister of Agriculture](#) in the alleged misappropriation of state-owned land plots; [alleged embezzlement of funds of Privatbank](#) with the suspicion to former

beneficial owner; [alleged misappropriation committed](#) by former management of State Property Fund; [alleged active bribery committed](#) by a Member of Parliament and business representatives in the process of reconstruction. The persistent efforts of NABU, SAPO, and HACC in bringing corrupt officials to justice highlight the significant progress made in combating corruption.

**PRETRIAL INVESTIGATION OF
NABU AND SAPO IN 2016-2023**



425

suspects

514

indictments

1 032

accused

204 PERSONS CONVICTED BY HACC

(from 5 September 2019 to 10 May 2024)



The **continuous and uninterrupted functioning of the anti-corruption institutions** during the full-scale Russian aggression against Ukraine is per se a significant achievement.

In addition to the creation of these agencies, Ukraine has complied with the UNCAC requirements **establishing the preventive anti-corruption body** – the National Agency on Corruption Prevention (NACP), and vesting it with the powers regarding the development and implementation of the state anti-corruption policy, issuing regulations on conflict of interests and gift acceptance, as well as conducting financial control function through verification of asset declarations of public officials, lifestyle monitoring and control over political party financing.

The creation of the NACP was coupled with **the introduction of the obligation to submit asset declarations for public officials**. This sweeping obligation requires thousands of officials, including politicians, civil servants, and judges, to publicly disclose their assets, income, and liabilities annually. The introduction of an electronic system for filing-in and publication of asset declarations of public officials in 2016 was [praised as one of the most comprehensive asset declaration systems worldwide](#) in terms of how much information was disclosed and made publicly available. It aims to prevent illicit enrichment, conflicts of interest, and other forms of corruption by enabling scrutiny of officials' financial activities.

Asset declarations represent a significant step towards fostering public trust, enhancing integrity, and deterring corrupt practices among Ukraine’s public officials. These measures have exposed corruption and deterred corrupt practices, indicating that the reforms are both substantial and effective.

Due to the start of full-scale war, the obligation to submit asset declarations was suspended. However, the Parliament adopted a law in September 2023 reinstating the obligation to submit asset declarations and powers of the NACP to conduct financial control. A public petition initiated by a prominent civic activist serving in the Armed Forces for making the register available to the public gained more than 100 000 signatures and the President sent the law back to parliament and the register became publicly available.

**DECLARATIONS SUBMITTED
BY PUBLIC SERVANTS**



Over 664,000 declarations were submitted by public servants [for the reporting period of 2023](#). For the previous campaign, which included two reporting periods at once (for 2021 and 2022) and took place after the resumption of declaration, 656,000 and 649,000 were submitted, respectively.

Even despite the ongoing war, Ukraine is making important progress in further enhancing the legislative framework for corruption prevention as well as prosecution of corruption.

In 2023, Ukraine strengthened the **autonomy of the Specialized Anti-corruption Prosecutor’s Office**. SAPO was transformed from the unit in the structure of the Prosecutor’s General Office to a full-fledged prosecutor’s office (and, consequently, a separate legal entity), with broader guarantees of autonomy to prevent undue interference in its operations. In March 2024, SAPO [started its operations in the new status](#) .

In 2024, the Ukrainian Parliament adopted amendments to the **procedure for adjudication of criminal cases by HACC**. Some cases were assigned to one-judge adjudication instead of mandatory three-judge panel consideration. This may help to enhance HACC’s effectiveness.

More legislative reforms are underway, such as amendments to facilitate plea bargain in high-level corruption cases or an ambitious draft law to improve corporate liability for bribery of public officials in Ukraine and abroad in line with the OECD standards (including autonomous liability of legal entities).

NARRATIVE 3:

"UKRAINE LACKS SYSTEMIC VISION OF HOW TO TACKLE CORRUPTION"

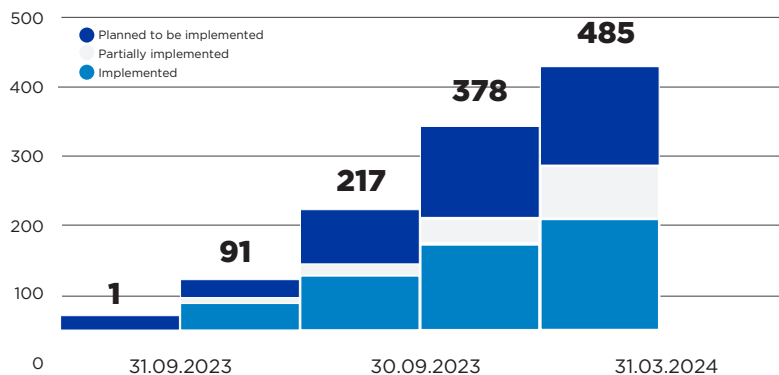
In June 2022, the Ukrainian Parliament adopted a new **comprehensive Anti-corruption Strategy till 2025** just days before Ukraine was granted EU candidate status. This followed a period without a strategy since 2017. To implement the Strategy properly, the NACP developed a detailed draft State Anti-Corruption Program within less than 6 months and the draft was based on solid available evidence. The Agency conducted extensive public consultations on each chapter of the draft. After some delays, in March 2023, the Cabinet of Ministers adopted the State Anti-Corruption Program and now the [implementation process is underway](#).

Both policy documents effectively and reasonably combine the measures on the further development of legislation on the prevention of and liability for corruption, anti-corruption institutions, specific tools such as asset disclosure, as well as the measures on the mitigation of corruption risks in the important areas (such as the judiciary and law enforcement, construction and land management, functioning of SOEs).

Another achievement is the introduction of a new publicly available electronic [system for monitoring](#) of implementation of the State Anti-Corruption Program.

The level of program implementation remains challenging, partially but not only, due to the context of war. As of end March 2024, 485 measures had to be implemented, among them 202 were fully implemented (39,8%) and 89 – partially implemented (18,1%).

Progress in the implementation of measures as of 07.06.2024



NARRATIVE 4:

"PUBLIC PROCUREMENT IS EQUAL TO CORRUPTION"

Ukraine has embraced digital solutions to combat corruption, reducing red tape and minimizing opportunities for corrupt interactions. To make public spending more efficient and close loopholes for corruption, Ukraine **introduced a groundbreaking public procurement system**, Prozorro, in 2016 which has won numerous awards and has been globally recognized as a standard for government transparency in procurement. Prozorro leverages digital technology to streamline the procurement process, making it more accessible, accountable, and competitive. Through an open online platform, Prozorro enables public entities to announce tenders, while also allowing businesses to submit bids electronically. This system ensures fair competition, reduces the risk of corruption, and enhances the quality of goods and services procured by the government. Moreover, Prozorro's transparent nature facilitates public oversight, as all procurement-related information, including contracts and expenditures, is made readily available online for scrutiny by citizens, journalists, and anti-corruption watchdogs. Prozorro is [recommended by the World Bank](#) to be used for procurement for the reconstruction of the country.

While Prozorro is providing the Ukrainian state with significant savings, it is no guarantee against corruption and there are still examples of corrupt practices in public procurement where the use of Prozorro is avoided or manipulated. Some authorities are taking steps to mitigate those risks.

Since 2017, public procurement system Prozorro is estimated to provide the state with UAH 27 bln annually in savings.



KEY PROZORRO INDICATORS PURCHASES FOR 2023

+28%
3 600 000
number of
completed
purchases

+69%
UAH 622 bln
expected value
of completed
procurements

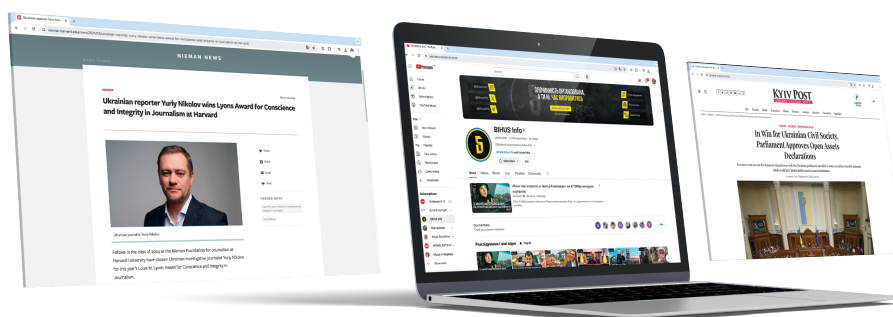
NARRATIVE 5:

"CIVIL SOCIETY IN UKRAINE IS UNABLE TO EFFECT CHANGE"

Ukraine benefited tremendously from the **wide participation of its strong and vibrant civil society in the anti-corruption institutional reforms**. Non-governmental organizations (NGOs), activist groups, and grassroots movements have emerged as key watchdogs, tirelessly advocating for anti-corruption measures, exposing corrupt practices, and holding public officials accountable for their actions. These civil society actors organize protests, conduct research, and provide legal assistance to whistleblowers, amplifying public pressure for systemic change. Furthermore, civil society organizations collaborate with governmental bodies and international partners to develop anti-corruption strategies, monitor compliance with anti-corruption laws, and promote civic education on ethical governance. NGO representatives in the past took part in selection commissions for the NACP Head, SAPO prosecutors, assessment of integrity of judges (as Public Integrity Council members), and monitored all competitions of heads of anti-corruption institutions providing selection commissions with valuable information. Through their relentless efforts, Ukraine's civil society continues to be a driving force in shaping the country's anti-corruption agenda and fostering a culture of integrity and transparency within its institutions. Recent incidents of pressure and harassment of civil society partners and investigate journalists are therefore of major concern and should be addressed.

Examples of civil society engagement:

- Public petition to open the register of asset declarations collected more than 83000 signatures in one day. The President returned the law to the parliament and the register was made open.
- Ukrainian investigative journalists receive international awards for their reporting on corruption cases. Latest example is journalist Yuri Nikolov.
- The Youtube channel of the important investigative media BIHUS.info that is revealing corruption cases has now over 1,09 million subscribers.
- Anti-corruption activists are included in the list of the most influential men and women in numerous Ukrainian rankings.



NARRATIVE 6:

"THE EU ACCESSION PROCESS HAS LITTLE IMPACT ON REDUCING CORRUPTION IN UKRAINE"

The perspective of EU Accession of Ukraine created a new set of incentives for the country to demonstrate tangible results in curbing corruption. **Remarkable progress in terms of legislation and policy has been recorded since then.** When the European Council granted candidate status to Ukraine in June 2022, it also emphasized the need to meet seven steps, outlined by the European Commission in order to progress on the path to the EU. Among them - to further strengthen the fight against corruption, in particular at a high level, through proactive and efficient investigations and a credible track record of prosecutions and convictions. **Ukraine advanced a series of reforms** in response to this requirement, the track record was substantially improved and the progress has been assessed as satisfactory to recommend opening the accession negotiations.

The path to the EU membership requires Ukraine to embark on approximation of its domestic legislation with the EU acquis, which nudges Ukraine to embrace EU AC standards and best practices and pursue further reforms. Opening negotiations will provide the EU with new measures to encourage and promote progress in the fight against corruption and provide the EU with new tools of scrutiny. Fighting corruption is seen as one of the “fundamentals” in the accession negotiations – these issues are among the first to be opened for negotiations and the last to be closed, **demonstrating the high priority the EU attaches to its fundamental values.**

Throughout the years international support has been a crucial factor in bolstering Ukraine’s anti-corruption initiatives. Financial and technical assistance from the European Union, the United States, and other international partners have facilitated the establishment and operation of anti-corruption bodies.

NARRATIVE 7:

"ANTI-CORRUPTION INTERVENTIONS ONLY FOCUS ON TOP-LEVEL CHANGES AND FAILED TO BRING ABOUT MEANINGFUL CHANGE TO LOCAL COMMUNITIES"

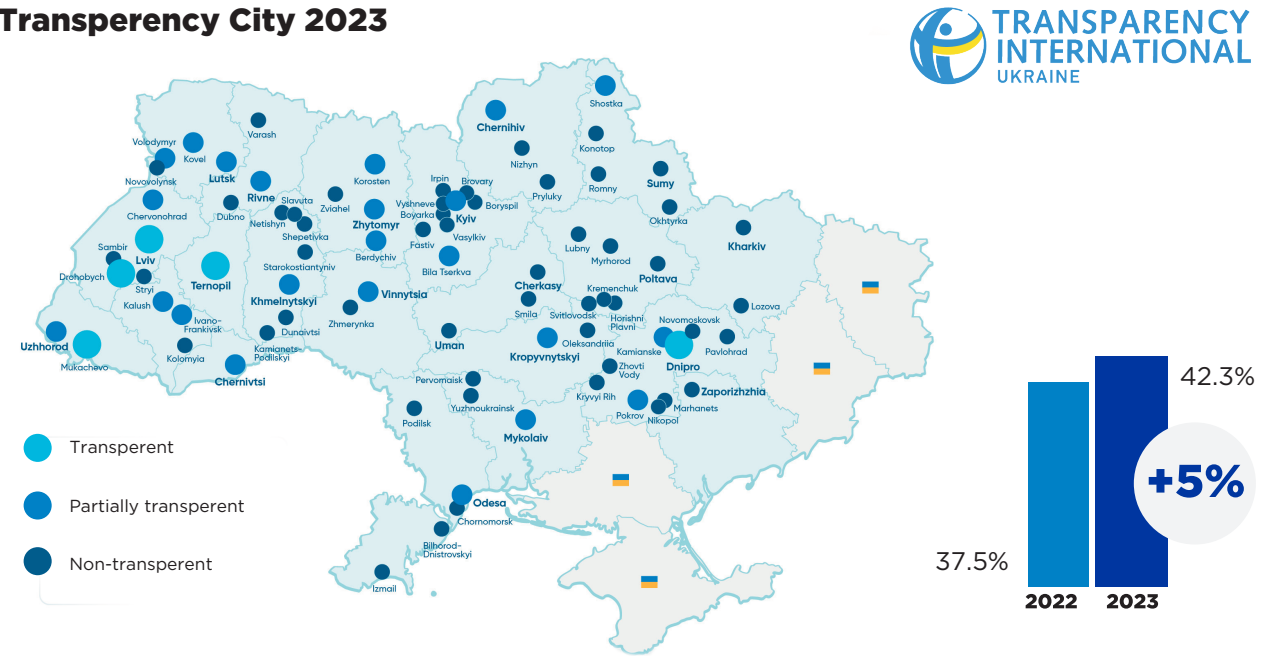
There are many examples of how anti-corruption reforms were brought to the level of local authorities. After Russia’s invasion a crucial aspect of local anti-corruption efforts involves adopting a comprehensive approach to community recovery. **This entails implementing effective digital solutions and improve procurement processes and financial control to ensure transparency, accountability, and efficiency in reconstruction and close gaps for corruption.**

For instance, the introduction of Local Geo Information Systems has been pivotal in several Ukrainian cities. Mykolaiv stands out as the first city to implement a module focusing on damaged and destroyed objects, enabling accurate assessment and prioritization of reconstruction efforts. Moreover, projects in Mykolaiv have led to the establishment of a robust system for monitoring and analyzing international aid, ensuring transparency in aid distribution and preventing mismanagement and corruption. In tandem with digital solutions, legislative developments have been crucial in reinforcing anti-corruption measures at the local level. Mykolaiv’s proactive approach to updating procurement procedures and policies exemplifies this, enhancing transparency and integrity in the procurement process and setting a precedent for other municipalities to follow, fostering a culture of accountability and trust.

The journey towards combating corruption at the local level in Ukraine has been marked by significant milestones and collaborative efforts. **The Integrity Cities Mykolaiv, Chernivtsi, Zhytomyr, Chervonograd and Nikopol exemplify the transformative impact of anti-corruption measures** in fostering transparent, accountable, and resilient communities. The Integrity City of Mariupol was assessed as the most transparent city by Transparency International in 2020 and 2021 before the Russian destruction and temporary occupation of the city.

Transparency International Ukraine released its second study of city transparency amid the full-scale war. In 2023, analysts assessed 70 cities and 10 municipalities near the front line, awarding status of transparent, partially transparent, or non-transparent.

Transperency City 2023



5

City Transparent

Dnipro, Drohobych, Lviv, Mukachevo, and Ternopil

23

Partially Transparent Cities

Berdychiv, Bila Tserkva, Vinnytsia, Volodymyr, Zhytomyr, Ivano-Frankivsk, Kalush, Kamianske, Kyiv, Kovel, Korosten, Kropyvnytskyi, Lutsk, Mykolaiv, Odesa, Pokrov, Rivne, Uzhhorod, Khmelnytskyi, Chervonohrad, Chernivtsi, Chernihiv, Shostka

52

Non-Transparent Cities

Bilhorod-Dnistrovskyi, Boryspil, Boyarka, Brovary, Varash, Vasylkiv Vyshneve, Horishni Plavni, Dubno, Dunaivtsi, Zhmerynka, Zhovti Vody, Zaporizhzhia and others.

CONCLUSION

While Ukraine continues to grapple with challenges related to corruption, the portrayal of the country as inherently corrupt and irredeemable is an oversimplification that ignores significant progress. Through the establishment of robust anti-corruption institutions, effective reforms, active civil society engagement, and substantial international support, Ukraine has demonstrated a clear commitment to tackling corruption. Recognizing these achievements is crucial for fostering a more accurate and balanced understanding of Ukraine's ongoing transformation.

This document was developed by the European Union Anti-Corruption Initiative (EUACI). The contents are the sole responsibility of the author and do not necessarily represent official views of the European Union or the Ministry of Foreign Affairs of Denmark.

ABOUT THE EU ANTI-CORRUPTION INITIATIVE IN UKRAINE

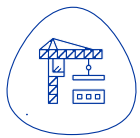
The EU Anti-Corruption Initiative (EUACI) – the leading anti-corruption support program in Ukraine – is funded by the EU and co-funded and implemented by the Ministry of Foreign Affairs of Denmark. The program was launched in 2017 as a response to the urgent need for anti-corruption reforms in the country.

The EUACI works in the following four areas:



AREA 1.

Capacity building of independent anti-corruption institutions



AREA 2.

Reconstruction and integrity



AREA 3.

Support to Integrity Cities (Mykolaiv, Zhytomyr, Chernivtsi, Chervonograd, Mariupol and Nikopol)



AREA 4.

Civil society, media



This programme is financed by the **European Union** and co-financed and implemented by the **Ministry of Foreign Affairs of Denmark**



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