

**The National Council for the Recovery of Ukraine from the
Consequences of the War**

Draft Ukraine Recovery Plan

**Materials of the “Anti-corruption policy”
working group**

July 2022

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Anti-corruption policy

PREAMBLE

Anti-corruption policy priorities before the war

Prior to the war, Ukraine managed to create an effective legal and institutional basis for combating corruption. The anti-corruption infrastructure includes a number of state bodies covering various aspects of anti-corruption activities.

In particular, the National Agency on Corruption Prevention ("NACP"), activities of which have significantly intensified since 2020, ensures formation and implementation of the State Anti-Corruption Policy. In turn, an important role in the system of anti-corruption bodies is played by the National Anti-Corruption Bureau ("NABU") thoroughly investigating corruption at a high level under the procedural guidance of prosecutors of the Specialized Anti-Corruption Prosecutor's Office ("SAPO"), as well as the newly created High Anti-Corruption Court (HACC), which managed to make important decisions in high-level corruption cases in the pre-war period.

On a separate note, one should mention the Business Ombudsman Council, which since 2015 has introduced certain integrity standards in the public and private sectors of the economy.

At the same time, in the pre-war period, it was impossible to complete several tasks that were important for the anti-corruption reform implementation (particularly, the appointment of a new head of the SAPO, election of a new head of ARMA, etc.).

Also, before the war, the Law on prevention of threats to national security related to the excessive influence of persons having significant economic and political weight in public life (oligarchs) and a plan of measures for its implementation was adopted.

Nowadays, on the one hand, trust in the actions of the authorities has increased, but there is still a serious public demand for anti-corruption reform, while corruption as a problem continues to be considered an important problem by both citizens and investors.

The impact and consequences of the war on industries and spheres

The war affected functioning of many public and private institutions. Because of the war, submission of electronic declarations of persons authorized to perform functions of the state and local self-government has been suspended, and financial control measures, particularly, full verifications of officials' declarations, are temporarily not carried out. Since martial law is in effect, it is necessary to develop and adopt balanced decisions on how to fully apply anti-corruption legislation even under martial law. Many anti-corruption officers as well as civil society volunteers have joined the armed forces to fight the enemy at the front.

Meanwhile, the war created new opportunities for corruption, and may also create a great risk for the post-war reconstruction of Ukraine and its further development directed towards European integration and recognized international practices and standards implementation.

Despite the aforementioned, one cannot but note that even in wartime Ukraine is moving decisively towards establishing systemic work of all state bodies in the fight against corruption. So, in particular, on June 20, 2022, the Verkhovna Rada adopted the Anti-Corruption Strategy for 2021-2025. The latter, first of all, is designed to significantly reduce the level of corruption in areas that Ukrainians consider to be the most corrupt (customs and taxation, courts and law enforcement agencies, state regulation of the economy, construction and land relations, the defense sector, health care and social protection). The law that approved the strategy also provides for changes to help improve work procedures of anti-corruption bodies. The document defines the following five basic principles of anti-corruption policy for 2021-2025:

- 1) optimizing functions of the state and local self-government authorities, particularly elimination of powers duplication of different bodies;
- 2) digital transformation of powers exercised by state authorities and local self-government bodies, transparency of activities and data disclosure;
- 3) creating more convenient and legal ways to meet the needs of individuals and legal entities, in contrast to existing corrupt practices;
- 4) ensuring inevitability of legal responsibility for corruption and corruption-related offenses;
- 5) forming public intolerance to corruption, establishing a culture of integrity and respect for the rule of law.

At the same time, today there are urgent problems for Ukraine not allowing to fully carry out anti-

corruption activities in the conditions of martial law:

- 1) no appointed heads of SAPO, NABU, ARMA;
- 2) the lack of a transparent mechanism for receiving and using funds for reconstruction and humanitarian aid, as well as a public open platform for publication and monitoring by the government, donors and civil society of receipts and expenditures of funds and humanitarian aid;
- 3) inadequate level of provision of anti-corruption bodies and institutions with personnel and material resources to perform their tasks (during and after martial law);
- 4) inconsistency of some anti-corruption legislation norms with international and EU standards, as well as some easing of anti-corruption legislation during martial law.

To sum it up, solving the problem of corruption should be one of the priorities for the Ukrainian society, especially at the stage of state restoration. At the same time, solving such a problem is impossible without the application of a comprehensive approach combining anti-corruption policy, policy of deligarchization of Ukraine, legislation and institutions, as well as specific measures in sectors with a high risk of corruption. The use of such a comprehensive approach is proposed in the Recovery Plan under the Anti-corruption Policy direction.

Anti-corruption policy Recovery Plan

The anti-corruption recovery plan provides for:

- 1) **Ensuring compliance with Ukraine's international commitments related to combating corruption, particularly those within European integration process** (aligning the national legislation with international standards and best practices for preventing and combating corruption, its proper implementation, increasing the effectiveness of the system of monitoring the activities of political parties and conducting election campaigns, increasing the effectiveness of prevention of corruption and conflict of interests);
- 2) **ensuring independence and effective work of anti-corruption bodies** for prevention, detection and punishment of corruption manifestations (providing for the effective work of the NACP in all areas of its activities, strengthening the institutional capacity of the NABU, ensuring the effective work of the SAPO) and **creating an effective system for tracing and returning assets obtained through corruption** . as well as the use of these assets for the post-war reconstruction of Ukraine (increasing the effectiveness of ARMA, the system for preventing legalization of illegally obtained assets, the system for tracing and managing illegally obtained assets, preventing corruption abuses during implementation of procedures related to forced seizure and collection of state income assets of Russia and its residents);
- 3) **promoting a culture of integrity** in the public and private sectors (developing a culture of zero tolerance to corruption among citizens of Ukraine, improving corporate governance in state and private companies, ensuring transparency during privatization, creating an ethical alternative to common corrupt practices, including the legislative establishment of the work of the Business Ombudsman, reducing the level of tolerance of corruption in the private and public sector of the economy);
- 4) **eliminating corruption risks arising during recovery measures** during martial law period and post-war reconstruction: planning, receipt, distribution, use of funds (prevention of corruption abuses during the provision, receipt and use of aid during martial law, creation of special mechanisms to minimize corruption manifestations during Ukraine's receipt of international aid for post-war reconstruction, improvement of the state audit and monitoring system to minimize corruption manifestations during Ukraine's post-war reconstruction).

September			RECOVERY PLAN LOGFRAMEWORK		
	Committee No	5			
	Group	Anti-corruption policy			
	A separate component) analysis area within the direction:	Anti-corruption policy as the constant implementation of successive measures of the state and society aimed at eliminating causes and conditions that give rise to and feed corruption in various spheres of life and create risks for stable economic growth and the development of democratic institutions as a condition for the integration of Ukraine into the EU, as well as to ensure inevitability of punishment for corruption offences.			
1	Key pressing issues to be solved under the Recovery Plan within the direction				
	The war influence on a defined analysis area:	<p>The war affected functioning of many public and private institutions. Because of the war, submission of electronic declarations of persons authorized to perform functions of the state and local self-government has been suspended, and financial control measures, particularly, full verifications of officials' declarations, are temporarily not carried out. Since martial law is in effect, it is necessary to develop and adopt balanced decisions on how to fully apply anti-corruption legislation even under martial law. Many anti-corruption officers as well as civil society volunteers have joined the armed forces to fight the enemy at the front.</p> <p>Meanwhile, the war created new opportunities for corruption, and may also create a great risk for the post-war reconstruction of Ukraine and its further development directed towards European integration and recognized international practices and standards implementation.</p> <p>Despite the aforementioned, one cannot but note that even in wartime Ukraine is moving decisively towards establishing systemic work of all state bodies in the fight against corruption. So, in particular, on June 20, 2022, the Verkhovna Rada adopted the Anti-Corruption Strategy for 2021-2025. The latter, first of all, is designed to significantly reduce the level of corruption in areas that Ukrainians consider to be the most corrupt (customs and taxation, courts and law enforcement agencies, state regulation of the economy, construction and land relations, the defense sector, health care and social protection). The law that approved the strategy also provides for changes to help improve the work procedures of anti-corruption bodies.</p> <p>At the same time, today there are urgent problems for Ukraine not allowing to fully carry out anti-corruption activities in the conditions of martial law:</p> <ol style="list-style-type: none"> 1) no appointed heads of SAPO, NABU, ARMA; 2) the lack of a transparent mechanism for receiving and using funds for reconstruction and humanitarian aid, as well as a public open platform for publication and monitoring by the government, donors and civil society of receipts and expenditures of funds and humanitarian aid; 3) inadequate level of provision of anti-corruption bodies and institutions with personnel and material resources to perform their tasks (during and after martial law); 4) inconsistency of some anti-corruption legislation norms with international and EU standards, as well as some easing of anti-corruption legislation during martial law. 			
1.1	Key challenges (summarized for the defined area):	<ul style="list-style-type: none"> ● No appointed heads of SAPO, NABU, ARMA; ● The need for introducing a transparent mechanism for receiving and using funds for reconstruction and humanitarian aid, a public open platform for publication and monitoring by the government, donors and civil society of receipts and expenditures of funds and humanitarian aid; ● Inadequate level of provision of state bodies, including anti-corruption bodies, institutions with personnel and material resources to perform their tasks (during and after martial law period); ● Inconsistency of some of anti-corruption legislation norms with international standards, EU standards, as well as certain relaxations of anti-corruption legislation during martial law; ● Lack of coordination of anti-corruption measures and low pace of their implementation; ● Incomplete judicial and the Prosecutor's Office reforms ● Inadequate protection of whistleblowers ● The need for eliminating prerequisites for corruption in high-risk corruption areas (such as construction and infrastructure, social and health care, land use, etc.); ● Reduction of public awareness of the fight against corruption and reduction of tools for public participation, public control implementation. 			
1.2	Key opportunities	Anti-corruption reforms have been carried out in a way meeting all the criteria for membership in the European Union and other Ukraine's international commitments and also allow to avoid corruption in the process of Ukraine's recovery.			

	(summarized for the defined area):				
1.3	Key constraints	Limited financial resources along with the workload on civil servants			
2	Goals, tasks, and stages of the Recovery Plan within the direction	Anti-corruption policy			
		Stage 1: Urgent measures (ensuring proper functioning of corruption prevention and combating system during the war and the early postwar period)	Stage 2: Medium-term measures (bringing corruption prevention and counteraction system in line with international standards and best practices)	Stage 3: Long-term measures (proper functioning of anti-corruption institutions and effectiveness of respective measures).	
2.1.	Description of Issue 1 to be solved under the defined analysis area:	Gaps in anti-corruption legislation, its improper law enforcement being a challenge on the way to Ukraine's membership in the European Union			
2.1.1.	Stages:	06/2022 - 12/2022	01/2023 - 12/2023	01/2024 - 12/2025	01/2026 - 12/2032
2.1.2.	Goal 1 to be achieved to solve the problem at each stage:	Ensuring Ukraine's compliance with international commitments related to combating corruption, particularly within the process of European integration and aligning the national legislation with international standards and best practices for preventing and counteracting corruption			
	Task 1. Ensuring Ukraine's compliance with international commitments related to combating corruption, particularly within the process of European integration and aligning the national legislation with international standards and best practices for preventing and	(i) Urgent development of legislation aimed at Ukraine's compliance with international commitments related to combating corruption, particularly within the European integration process and aligning the national legislation with international standards. (ii) To develop and adopt draft laws to fully comply with the requirements of the Convention on the Protection of the European Communities' Financial Interests and Directive 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law; (iii) To ensure compliance of Ukrainian	(i) To ensure full compliance of Ukrainian legislation and its implementation practice with the requirements of: - UN Convention against Corruption; - Criminal Law Convention on Corruption, its Additional Protocol; - Civil Law Convention on Corruption; - OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. (ii) To develop and adopt draft laws to fully comply with the requirements of the Convention on the Protection of the European Communities' Financial Interests and Directive 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law; (iii) To ensure compliance of Ukrainian	(i) Accession to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions; (ii) To provide for disciplinary and administrative liability of managers (heads) for non-compliance with the law to bring anti-corruption legislation violators to disciplinary responsibility. (iii) To develop and adopt a law to bring the provisions of the Criminal Code of Ukraine on corruption and corruption-related offences in line with international standards: - to bring the list of foreign officials in line with the standards of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions; - to align provisions on exemption from criminal liability with the international standards in accordance with Part 5 of Art. 354 of the	(i) Completion of aligning the national legislation with the Directive (EU) 2019/1937, taking into account the experience of introducing an institution for whistleblowers protection in Ukraine.

	counteracting corruption		legislation and its implementation practice with the requirements and recommendations of: - OECD Istanbul Anti-Corruption Action Plan of Anti-Corruption Network for Eastern Europe and Central Asia - Conference of UNCAC member states (iv) To ensure that Ukraine joins the OECD Working Group on Bribery in International Business Transactions. (v) To provide for full implementation of recommendations on preventing and combating corruption provided to Ukraine within the framework of international monitoring mechanisms (GRECO assessment, the Istanbul Anti-Corruption Action Plan implementation monitoring, the UN Convention against Corruption implementation monitoring).	Criminal Code of Ukraine (as for immediate notification of a crime and impossibility of applying this provision to the person who initiated provision of an unlawful benefit); (iv) To adopt a law on the possibility of bribery provocation to provide for the rules and procedure for taking such actions, guarantees of legality and control, consequences of their taking (encouragement or bringing to disciplinary responsibility), as well as the fact that such inspections are not covert investigative actions, their results cannot be used in the criminal trial as means of proof, criminal proceedings are not launched based on their results. (v) To amend legislation to improve the whistleblower protection effectiveness.	
2.1.3.	Timeframe under the stage:	(i) Urgent review of draft laws prepared and submitted to the Verkhovna Rada aimed at complying with Ukraine's international obligations related to combating corruption, particularly within the European integration process.	(i) A package of draft laws on amendment of some legislative acts of Ukraine on bringing the national legislation of Ukraine in line with international acts in the field of preventing and combating corruption prepared - December 2023.	(i) To adopt a law on ratification of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions - December 2024; (ii) Adopt a law on amendments to some legislative acts on the introduction of liability of managers for non-fulfillment of the requirements of the legislation on bringing violators of anti-corruption legislation to disciplinary responsibility - June 2025.	(i) To adopt the law on bringing the national legislation in line with the EU Directive 2019/1937 (full adaptation completion) - December 2028)
2.1.4.	Risks related to the goal achievement:	Limited funding	Limited funding	Limited funding	Limited funding
2.1.5.	Goal achievement indicator:	(i) Ukraine's international obligations fulfillment monitoring shows progress.	(i) Reports of international monitoring missions of the OECD, GRECO, the Council of Europe confirm compliance of national legislation with international conventions and decisions;	(i) Reports of international monitoring missions of the OECD, GRECO, the Council of Europe confirm compliance of national legislation with international conventions and decisions;	(i) Reports of international monitoring missions of the OECD, GRECO, the Council of Europe confirm the compliance of national legislation with international conventions and decisions
2.1.6.	General need for funds for the goal achievement:	(i) Within the framework of planned expenditures of the State Budget of Ukraine (ii) Within the framework of international technical assistance projects funding	(i) Within the framework of planned expenditures of the State Budget of Ukraine (ii) Within the framework of international technical assistance projects funding	(i) Within the framework of planned expenditures of the State Budget of Ukraine (ii) Within the framework of international technical assistance projects funding	(i) Within the framework of planned expenditures of the State Budget of Ukraine (ii) Within the framework of international technical assistance projects funding
2.1.7.	Goal connections with other directions:	European integration, justice, digital transformation	European integration, justice, digital transformation	European integration, justice, digital transformation	European integration, justice, digital transformation
	Description of Issue 2 to	The need for achieving significant progress in preventing and counteracting corruption to ensure Ukraine's stable economic growth and building effective and inclusive democratic institutions.			

	be solved under the defined analysis area:				
Stages:	06/2022 - 12/2022	01/2023 - 12/2023	01/2024 - 12/2025	01/2026 - 12/2032	
Goal 2 to be achieved to solve the problem at each stage:	Introducing a comprehensive anti-corruption policy and eliminating conditions, including at the legislative level, that contribute to commissioning of corruption offenses				
Task 1. Ensuring anti-corruption policy formation, coordination, implementation monitoring, and performance assessment in accordance with international standards and best practices	<p>(i) To develop and approve the State Anti-Corruption (AC) program for the implementation of the AC strategy for 2021-2025 with the engagement of parties concerned;</p> <p>(ii) To approve the procedure for monitoring and coordinating the AC strategy implementation for 2021-2025;</p> <p>(iii) To create a Coordinating Working Group on AC policy issues, involve the public and international partners in its work, determine the procedure for its activities and provide the necessary resources for its operations.</p>	<p>(i) To provide for online monitoring of the state AC policy measures implementation;</p>	<p>(i) To introduce a unified system of collection, processing and publication of statistical information on detection of corruption and corruption-related offenses, conducting proceedings against them, searches and return of assets obtained from corruption and other crimes;</p> <p>(ii) To create a single online system for collecting, processing and publishing statistical information on the detection of corruption and corruption-related offenses, conducting proceedings against them, searches and return of assets obtained from corruption and other crimes;</p> <p>(iii) To present a final report on the state AC policy effectiveness, which will also contain recommendations on anti-corruption policy priorities for the upcoming years;</p> <p>(iv) To prepare and approve the AC Strategy for 2026-2030 as well as the state program for the of the AC Strategy implementation for 2026-2030.with the participation of parties concerned.</p>	<p>(i) To present the National Report on the state anti-corruption policy effectiveness in 2021-2025 as well as recommendations on the content and priorities of the AC Strategy for the new period (2026-2030);</p> <p>(ii) To approve the AC Strategy for 2026-2030 and respective documents (state program and provide for its funding).</p>	

<p><u>Task 2.</u> Increasing the effectiveness of the system of control over the of political parties' activities and conducting of election campaigns</p>		<p>(i) To legally restore the obligation of political parties to submit reports on property, income, expenses and liabilities of a financial nature.</p>	<p>(i) To develop and adopt draft laws on financing of political parties and their control, taking into account recommendations and standards of the Council of Europe, GRECO, the Venice Commission (particularly, in matters of state financing of non-parliamentary political parties; indirect state support of political parties; clear demarcation of functions of controlling bodies; introduction of effective, deterrent and proportional sanctions for violation of established requirements); (ii) To develop and adopt a draft law to restore the implementation of measures of financial control of officials and prevent declarations submission gaps; (iii) The NACP to improve the effectiveness of financial control and verification of political parties reporting; (iv) The NACP to ensure the functioning of political parties reports submission and publication electronic system (in the form of a data set and machine-readable format, as well as with access via API); (v) The NACP to ensure the functioning of the electronic reporting system on the receipt and use of election fund funds.</p>		
<p><u>Task 3.</u> Increasing the effectiveness of corruption and conflict of interests prevention</p>			<p>(i) To develop and adopt a draft law on clarifying the list of subjects of declaration taking into account corruption risks assessment results, grounds for checking declarations, eliminating gaps regarding deadlines for submitting declarations, improving mechanisms for checking declarations to detect signs of offenses (false declarations in the form of considerable assets concealment and/or their value and illegal enrichment); (ii) To increase the effectiveness of control and verification of declarations owing to further development of digital tools and their wider application, ensuring the unity of the practice of the NACP, development of international cooperation, wider access of the NACP to information on assets value.</p>	<p>(i) To prepare and adopt a draft law improving the procedure for identifying and settling conflict of interests, including in connection with the presence of corporate rights, regulating receipt of gifts, eliminating discrepancies in legislation for the purposes of implementing the Law "On Prevention of Corruption"; (ii) To legislatively enshrine the ethical conduct for People's Deputies of Ukraine</p>	
<p><u>Task 4.</u> Creating an ethical alternative to</p>		<p>(i) To identify top ten common corrupt practices based on corruption studies conducted by the NACP, other bodies and public associations</p>	<p>(i) To provide for implementation of the Law of Ukraine "On the Administrative Procedure" and bring the regulatory framework in line with the</p>	<p>(i) To ensure the use of electronic services as the main way of providing administrative services.</p>	

	common corrupt practices.	representatives, scientific institutions, educational institutions, and experts having proper qualification.	provisions of the law.		
	Task 5. Ensuring state-owned (enterprises (SEs) management structure integrity and activities	(i) Amend regulatory legal acts on providing for the flexibility of SE management bodies to make decisions necessary to ensure economic security during martial law period (without changing the OECD corporate governance principles) (regarding delegation of powers, appointment and extension of powers of supervisory boards members and heads, other corporate governance peculiarities).	(i) To align SEs corporate governance legislation with the OECD Guidelines on Corporate Governance of State-Owned Enterprises, particularly in terms of transferring powers to supervisory boards to approve strategic, investment, and financial plans and to appoint and dismiss a head; (ii) To develop anti-corruption programs and implement anti-corruption standards and practices of SE; (iii) To bring the corporate governance of SEs in line with the OECD Guidelines for Corporate Governance of State-Owned Enterprises in terms of corporate governance code implementation, code of ethics and business conduct, provisions on supervisory board formation principles, SE corporate governance measures individual plans, regulations on supervisory board committees and the corporate secretary, etc.	(i) To develop anti-corruption programs and implement anti-corruption standards and practices of SE; (ii) To regularly assess corruption risks (both internal and external) in SEs at least every three years.	(i) To provide for compliance with the OECD Guidelines on Corporate Governance of State-Owned Enterprises.
	Task 6. Transparency of privatization		(i) To review and cancel unsubstantiated moratoriums on enforcement of judgments the debtors by which are state-owned enterprises, including moratoriums on application of rehabilitation and liquidation procedures in bankruptcy cases; (ii) To approve the draft law on the list of state property objects that are not subject to privatization; (iii) To accelerate the sale of public sector non-earning assets to ensure rapid receipt of significant budget revenues upon abolition of martial law.	(i) To provide a communication strategy regarding privatization and actions of the CMU	
	Timeframe under the stage:	(i) To provide funding for the Anti-corruption Strategy measures - September 2022 in the draft Law "On the State Budget for 2023"; (ii) To amend the legal act regarding specifics of corporate governance of legal entities whose shareholder (founder, participant) is the state during the period of martial law in Ukraine - September 2022;	(i) To adopt a law that to provide for mechanisms for coordination, monitoring and evaluation of anti-corruption policy and interaction of anti-corruption institutions with other state and local authorities - September 2023; (ii) To provide for online monitoring of the state anti-corruption policy measures implementation on the Single e-Government web portal - April 2023; (iii) An automatic political parties' reports checking introduced - February 2023. (iv) The functioning of the electronic reporting system on the receipt and use of election fund funds ensured - March 2023;	(i) To adopt a law on amendments to some legislative acts to improve provisions related to conflict of interests settlement; (ii) Adopt the Law of Ukraine "On Amendments to the Law "On the Status of a People's Deputy of Ukraine" regarding the ethical conduct of members of the Parliament; (iii) To regulate the lobbying issue at the legislative level; (iv) To update executive authorities' regulatory acts resulting from the Law "On the Administrative Procedure to ensure that they enter into force simultaneously with the entry of this Law in force - December 2023; (v) The CMU to inform the Verkhovna Rada of	

			<p>(v) A draft law on improving political parties financing mechanism and its control prepared - December 2023;</p> <p>(vi) A draft law on the abolition of unsubstantiated moratoriums on the enforcement of judgments the debtors by which are state enterprises, including moratoriums on application of rehabilitation and liquidation procedures in bankruptcy cases submitted to the Verkhovna Rada;</p> <p>(vii) A draft law on the list of state property objects that are not subject to privatization approved;</p> <p>(viii) The legislation aimed at the accelerated sale of non-earning public sector assets to ensure the rapid receipt of significant budget revenues after the abolition of martial law amended;</p> <p>(ix) The OECD Guidelines on Corporate Governance of State-Owned Enterprises implemented and transparency of activities and decision-making processes of SC "Ukroboronprom" increased;</p> <p>(x) The Law on Amendments to Some Legislative Acts of Ukraine on Improvement of Corporate Governance of Legal Entities whose Shareholder (Founder, Participant) is the State adopted.</p>	the implementation state of the Law "On the Administrative Procedure" - 2024.	
	Risks related to the goal achievement :	Limited funding	Limited funding	Limited funding	Limited funding
	Goal achievement indicator:	<p>(i) Budgetary funding for the implementation of the AC Strategy in the amount of at least 90% of the request provided;</p> <p>(ii) International partners (OECD, EBRD, World Bank, etc.) monitoring reports show that supervisory boards of SEs are created on a transparent basis, taking into account the professional achievements of the candidates and consist of at least one third of independent directors.</p>	<p>(i) At least 30% of the AC Strategy measures and of the Program for its implementation put into practice;</p> <p>(ii) Budget funding for the implementation of the AC Strategy in the amount of at least 90% of the budget request allocated;</p> <p>(iii) Online monitoring of the state AC Policy measures implementation on the Single e-Government web portal ensured;</p> <p>(iv) An automatic checking of political parties' reports and the use of election fund funds introduced;</p> <p>(v) AC Programs implemented and are subject to proper monitoring in the ten largest SEs;</p> <p>(vi) The corporate governance of the 10 largest SEs complies with the OECD Guidelines on Corporate Governance of State-Owned Enterprises (a code of corporate governance, ethics and business conduct implemented,</p>	<p>(i) To perform at least 90% of the AC Strategy measures and of the Program for its implementation;</p> <p>(ii) State funding of non-parliamentary political parties that did obtain seats in the Verkhovna Rada, but received a certain level of support restored;</p> <p>(iii) The OECD monitoring confirms that SEs risk assessment covers corruption risks and is carried out properly.</p>	<p>(i) 100% of the AC Strategy measures and of the State Program for its implementation was put into practice;</p> <p>(ii) The AC Strategy for 2026-2030 and the respective state program for its implementation approved;</p> <p>(iii) Budgetary financing for the implementation of the AC strategy in the amount of not less than 90% of the request provided;</p> <p>(iv) As a result of increased competition, business entities are more responsibly and rationally use assets in their possession;</p> <p>(v) The application of the envisaged of corporate governance model will not only increase the amount of revenues to the state budget, but</p>

			provisions on the supervisory board formation principles, provisions on the supervisory board committees and the corporate secretary are in place); (vii) After reviewing and canceling moratoriums on the enforcement of judgments by which the debtors are state enterprises, including moratoriums related to application of rehabilitation and liquidation procedures in cases of bankruptcy, "big" and "small" privatization processes will be unblocked.		also contribute to the improvement of the quality of services provided to the population
	General need for funds for the goal achievement :	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing (iii) Within the limits of SE's own resources	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing (iii) Within the limits of SE's own resources	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing (iii) Within the limits of SE's own resources	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing (iii) Within the limits of SE's own resources
	Goal connections with other directions:	European integration, justice, economy, digital transformation	European integration, justice, economy, digital transformation	European integration, justice, economy, digital transformation	European integration, justice, economy, digital transformation
2.2.	Description of Issue 3 to be solved under the defined analysis area:	Insufficient institutional and operational independence and capacity of specialized bodies to prevent, detect and punish manifestations of corruption			
2.2.1.	Stages:	06/2022 - 12/2022	01/2023 - 12/2023	01/2024 - 12/2025	01/2026 - 12/2032
2.2.2.	Goal 3 to be achieved to solve the problem at each stage:	Ensuring anti-corruption bodies independence and effective work to prevent, detect and punish corruption			
	Task 1 Ensuring the effective work of the National Agency on Corruption Prevention (NACP) in all areas of its activities	(i) To complete an external independent assessment of the NACP performance effectiveness; (ii) To implement recommendations given based on the NACP performance effectiveness assessment results and to publicly inform of their implementation status, as well as to review the NACP KPIs taking into account the audit recommendations; (iii) It is necessary to regulate the procedure for monitoring subjects of declaration lifestyle; (iv) To put the Single Whistleblower Reporting Portal into operation and approve the NACP by-laws related to its functioning;		(i) To provide for periodic external independent assessment (including recommendations implementation, informing of recommendations implementation status, review of evaluation criteria and methods); (ii) To ensure division of powers between the CEC and the NACP regarding control over the financing of political activities and pre-election campaigning; (iii) To provide for civil servants' declarations risk-oriented monitoring (by also using IT tools).	(i) To provide for periodic external independent assessment (including recommendations implementation, informing of recommendations implementation status, review of evaluation criteria and methods);

	<p>Task 2. Strengthening the institutional capacity of the National Anti-Corruption Bureau of Ukraine (NABU)</p>	<p>(i) To conduct competitive selection for the position of NABU Director in full compliance with the requirements of the law, transparently and impartially, without unreasonable delays.; (ii) To enable NABU to autonomously intercept communications from electronic communication networks, by implementing a set of necessary technical, organizational and technical solutions; (iii) To develop and adopt a bill to clarify the maximum number of NABU employees; (iv) To ensure proper NABU financing, particularly for the implementation of autonomous removal of information from electronic communication networks.</p>	<p>(i) To conduct an external independent NABU performance assessment with the participation of international experts, publish the results of the audit, and provide for informing of the provided recommendations implementation status; (ii) To ensure the possibility of independent expert institutions functioning for carrying out expert examinations in criminal proceedings.</p>	<p>(i) To provide for periodic external independent assessment (including recommendations implementation, informing of recommendations implementation status, review of evaluation criteria and methods);</p>	
	<p>Task 3. Ensuring the effective work of the Specialized Anti-Corruption Prosecutor's Office (SAPO)</p>	<p>(i) To complete the procedure for appointing the head of the SAPO based on competition results; (ii) To develop and adopt draft laws to expand the institutional and operational autonomy of the SAPO, as well as the SAPO leadership team powers; (iii) To improve the selection procedure for administrative positions in the SAPO and prosecutors; (iv) To introduce external independent SAPO audit.</p>	<p>(i) To introduce and ensure the conduct of an external independent assessment of the SAPO performance effectiveness simultaneously with the NABU audit and, with the participation of international experts, publish the audit results, auditors' recommendations and provide for a monitoring system for given recommendations implementation.</p>	<p>(i) To provide for periodic external independent assessment (including recommendations implementation, informing of recommendations implementation status, review of evaluation criteria and methodology);</p>	
	<p>Task 4. Ensuring the effective work of the Asset Recovery and Management Agency (ARMA)</p>	<p>(i) To hold a transparent, impartial competition for the position of the Chairman of ARMA, with selection based on the criteria of integrity and competence, with subsequent appointment to the position of the winner of the competition without unreasonable delays; (ii) To ensure the full functioning and putting of the Unified State Register of Assets Arrested in Criminal Proceedings into industrial operation.</p>	<p>(i) To develop and adopt a draft law to guarantee the institutional and operational independence of ARMA, introduce an effective procedure for external independent ARMA's performance effectiveness assessment, and also improve the selection procedures for the Head of ARMA for the sake of transparency, objectivity of selection based on the merits of candidates; (ii) To develop and approve Standards of Interaction between ARMA, Prosecutor's Office, pre-trial investigation bodies, other competent authorities regarding seizure planning, asset tracing, management and recovery; (iii) To introduce effective procedures for cooperation and information exchange between ARMA and the State Financial Monitoring Service.</p>	<p>(i) To provide for carrying out an external independent ARMA's performance effectiveness assessment, implementation of provided recommendations and information on their implementation status.</p>	
2.2.3.	<p>Timeframe under the stage:</p>	<p>(i) The Head of SAPO appointment - July 2022;</p>	<p>(i) Independent expert institutions being beyond law enforcement bodies management are functioning.</p>	<p>(i) Periodic external independent assessment (including recommendations implementation, informing of recommendations implementation status, review of evaluation criteria and methods) ensured; (ii) The division of powers between the CEC and the NACP regarding control over the financing of political activities and pre-election campaigning regulated.</p>	<p>(i) Periodic external independent assessment (including recommendations implementation, informing of recommendations implementation status, review of evaluation criteria and methodology) ensured;</p>

2.2.4.	Risks related to the goal achievement:	Deterioration of the level of financing and material and technical support of the activities of the AC bodies	(i) Deterioration of the funding and logistic support for AC bodies activities; (ii) A temporary restriction (for the period of martial law) regarding declarations submission by candidates and those appointed to certain positions during the period of martial law (the Law of Ukraine "On Amendments to Certain Laws of Ukraine Regarding the Functioning of the Civil Service and Local Self-Government during the Martial Law Period "	(i) Deterioration of their financing level and logistic support for activities	(i) Deterioration of the financing level and logistic support for AC bodies activities.
2.2.5.	Goal achievement indicator:	(i) Budget financing of NACP, NABU, SAPO and ARMA is at the level of not less than 90%; (ii) The Head of SAPO appointed; (iii) Director of NABU appointed; (iv) The Head of ARMA appointed; based on transparent and impartial competition results. (v) Recommendations according to the Report on NACP performance effectiveness implemented; (vi) Lawful interception of communications using NABU's own technical capabilities ensured (vii) Amendments to Articles 2, 5, 12 of the Law on ARMA made; (viii) A by-law on the unified electronic register adopted; (ix) Monitoring and control over the seizure of assets of the Russian Federation and its residents, their management and sale, as well as over the distribution and targeted use of state budget funds is carried out. (x) The results of operational audits (management audits) of ARMA testify to the effectiveness of assets transferred to its management	(i) Declarations for 2021 and 2022 submitted by the subjects of declaration; (ii) A report on the SAPO external independent assessment results published; (iii) Independent expert institutions for conducting expert examinations in criminal proceedings are functioning; (iv) An external independent assessment was conducted and its results were made public; a system for monitoring the commission's recommendations implementation developed; (v) The National Asset Recovery Strategy and its implementation plan approved; (vi) The national assessment of risks of legalization of funds obtained through criminal means for 2020-2022 carried out; (vii) Amendments to legislation regarding the improvement of mechanisms for checking information on the ultimate beneficial owners and the ownership structure of legal entities have adopted.	(i) The report based on anti-corruption bodies external independent performance assessment results is made public in a timely manner; (ii) Implementation of at least 90% of recommendations based on anti-corruption bodies (NACP, NABU, SAPO, ARMA) external independent performance assessment results ensured; (iii) At least 1,000 full verifications of declarations per year conducted;	(i) The external independent anti-corruption bodies assessment results show their impeccable work.
2.2.6.	General need for funds for the goal achievement:	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing
2.2.7.	Goal connections with other directions:	European integration, justice	European integration, justice	European integration, justice	European integration, justice

2.3.	Description of Issue 4 to be solved under the defined analysis area:	Unreadiness of the system for tracing and returning assets obtained through corruption, including challenges related to the military aggression of the Russian Federation against Ukraine and overcoming its consequences.			
2.3.1.	Stages:	06/2022 - 12/2022	01/2023 - 12/2023	01/2024 - 12/2025	01/2026 - 12/2032
2.3.2.	Goal 4 to be achieved to solve the problem at each stage:	Creation of an effective system for combating legalization (laundering) of funds obtained from corruption crimes, as well as a system for tracing and returning assets obtained through corruption			
	Task 1. Increasing the effectiveness of the system for preventing legalization of illegally obtained assets	(i) To develop and adopt legislative changes make the national legislation fully compliant with the Financial Action Task Force (FATF) recommendations, taking into account MONEYVAL evaluations and opinion; (ii) To develop a draft law to fully align the national with the requirements of the Directive of the European Parliament and of the Council (EU) 2015/849 of May 20, 2015 (as amended)	(i) To conduct an analysis of the national legislation compliance with the requirements of the Directive of the European Parliament and of the Council (EU) 2015/849 of May 20, 2015 (as amended); (ii) To develop and adopt a draft law on introduction of an effective procedure for verification of the ultimate beneficial owners of legal entities, as well as on strengthening of sanctions for failure to submit or submission of inaccurate information on the ultimate beneficial owners."	(i) To conduct the next national assessment of risks in the field of prevention and countermeasures against legalization (laundering) of criminal proceeds and financing of terrorism, determine measures in response to identified risks based on its results and implement them.	
	Task 2. Increasing the effectiveness of the system for search and management of illegally obtained assets		(i) To improve the procedures for determining managers for assets transferred to ARMA to eliminate corruption risks; (ii) To introduce a mechanism for directing part of the income from management of assets transferred to ARMA (cash in particular) to the state budget .	(i) To improve the legislation on transferring assets for ARMA management; (ii) To prepare and conclude bilateral and multilateral agreements, memoranda, etc. with respective authorities of other countries on issues of identification, search, return of assets obtained through corruption or other criminal means; (iii) To implement and develop digital tools used by ARMA for asset tracing, information exchange, access to registers and databases; (iv) To conduct trainings and other educational events for authorized bodies employees on international cooperation procedures for identifying, searching, and returning assets obtained through corruption or other criminal means.	
2.3.3.	Timeframe under	(i) National legislation is fully compliant with the	(i) Report on the analysis of the national		

	the stage:	Financial Action Task Force (FATF) recommendations, taking into account MONEYVAL evaluations and opinion – by the end of 2022;	legislation compliance with the requirements of the Directive of the European Parliament and of the Council (EU) 2015/849 of May 20, 2015 (as subsequently amended) - May 2023; (ii) The Law of Ukraine on introduction of an effective procedure for verification of ultimate beneficial owners of legal entities, as well as strengthening of sanctions for failure to submit or submission of inaccurate information on ultimate beneficial owners adopted - October 2023.		
2.3.4.	Risks related to the goal achievement:	corruption risks	Insufficient institutional and material support of the Commission for external assessment of ARMA performance; Insufficient funding for creating the register		
2.3.5.	Goal achievement indicator:	(i) Financial Action Task Force (FATF) recommendations, taking into account MONEYVAL evaluations and opinion implemented; (ii) Forcibly seized assets and income from their sale go to the State Budget of Ukraine;	(i) The National Asset Recovery Strategy and its implementation plan approved; (ii) The national assessment of the risks of legalization of funds obtained through criminal means for 2020-2022 conducted; (iii) Amendments to the legislation adopted to improve the mechanisms for verifying information on ultimate beneficial owners and legal entities ownership structure.	(i) The MONEYVAL Committee approved the 4th report on the progress of Ukraine based on the results of the 5th round of assessment of Ukraine regarding FATF recommendations implementation; (ii) Standards of cooperation between NABU, SAPO, ARMA, NACP, SFMS on counteraction to legalization, search and return of assets (iii) A centralized register containing legal entities' and individuals' bank accounts created.	(i) The National Asset Recovery Strategy implemented; (ii) Not a single disciplinary, administrative, or criminal offense was detected during the reporting period, which could have been committed by officials during exercising powers to prevent legalization of funds and other assets obtained through corruption, as well as their search and return
2.3.6.	General need for funds for the goal achievement:	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing
2.3.7.	Goal connections with other directions:	European integration, digital transformation	European integration, digital transformation	European integration, digital transformation	European integration, digital transformation
2.4.	Description of Issue 5 to be solved under the defined analysis area:	Ineffective governance and corruption threatening the country's economic and physical security and leading to the loss of people and resources.			
2.4.1.	Stages:	06/2022 - 12/2022	01/2023 - 12/2023	01/2024 - 12/2025	01/2026 - 12/2032
2.4.2.	Goal 5 to be achieved to solve the problem at each stage:	Promoting a culture of integrity in public and private sectors			
	<u>Task 1.</u> Developing a culture of zero		(i) To update the Communication Strategy in the field of prevention and counteracting corruption	(i) To integrate anti-corruption issues into education curriculums at all levels (including professional development of teaching staff and	

	tolerance to corruption among <u>citizens of Ukraine</u>			conducting informational and educational activities); (ii) To ensure the Communication Strategy implementation in the field of prevention and counteracting corruption	
	<u>Task 2.</u> Ensuring an adequate level of financial support for civil servants	(i) To adopt the necessary legal acts and create a Payroll Fund of servants whose positions have a high level of corruption risks, as well as provide a financial incentives mechanism for high performers	(i) The Payroll Fund for servants whose positions have a high level of corruption risks is functioning and a financial incentives mechanism for high performers is also in place.	(i) The Payroll Fund for servants whose positions have a high level of corruption risks is functioning and a financial incentives mechanism for high performers is also in place.	
	<u>Task 3.</u> Reducing the level of tolerance of corruption in private and public sector of the economy	(i) To regulate at the legislative level the Business Ombudsman Institution activities, which will contribute to the reduction of state bodies malpractice and promote standards of business integrity	(i) To regularly hold media events on anti-corruption topics in state bodies with the participation of persons authorized perform communications on anti-corruption issues; (ii) To issue communication products related to issues of prevention and combating corruption, including those contributing to reducing tolerance to corruption in society, namely feature stories, blogs in printed and/or electronic mass media, statistical reports, infographics, printed products, social advertising campaigns (outdoor advertising, video and audio clips) (subject to budgetary allocations and other resources); (iii) To carry out measures to share anti-corruption educational information.	(i) To implement measures to improve whistleblowers performance effectiveness (consideration of whistleblowers' reports; familiarity with the channels for submitting reports; use of the functioning of the Unified Whistleblower Reporting Portal); (ii) Amend the legislation to introduce incentives for the private sector to improve business integrity, particularly through the obligation to adopt ethical codes and corporate governance rules; (iii) In cooperation with the business environment, provide assistance to legal entities under private law in the development and improvement of codes of integrity based on leading corporate governance practices; (iv) With the participation of NACP, to ensure provisioning of methodological assistance to business entities under private law regarding the practice of applying anti-corruption standards, identifying corruption risks in their activities, as well as developing and implementing effective anti-corruption programs aimed at eliminating these risks.	
	Timeframe under the stage:	(i) The Law of Ukraine "On the Business Ombudsman Institution" adopted in October 2022 (ii) Legislation amended and Payroll Fund for reformative staff in the civil service system created	(i) The Payroll Fund for reformative staff in the civil service system is being replenished and functions properly; (ii) An information campaign aimed at reducing the level of tolerance to corruption in society is being conducted	(i) The Payroll Fund for reformative staff in the civil service system is being replenished and functions properly (ii) The Whistleblower Institution is properly organized	
2.4.3.	Risks related to the goal achievement:	High level of tolerance to corruption in society, weakening of anti-corruption measures under the pretext of martial law, lack of financial and organizational support for respective measures.	High level of tolerance to corruption in society, lack of financial and organizational support for respective measures	High level of tolerance of corruption in society, lack of financial and organizational support for respective measures	

2.4.4.	Goal achievement indicator:	(i). An appropriate level of remuneration for employees whose positions have a high level of corruption risks ensured, as well as a financial incentives mechanism for high performers is in place	(i) An indicator "Agree with the fact that ordinary people can contribute to fighting against corruption" is at least 23% (the level of Poland in 2021); (ii) An indicator "Willingness of citizens to report corruption" is at least 19% (the lowest level in the EU in 2021); (iii) An indicator "A decrease in the share of the population that had personal experience of corrupt behavior" to reach 20% (the level of Bulgaria and Romania, the lowest in the EU in 2021) (iv) The Business Ombudsman Institution functions in accordance with the approved law; (v) At least 60% of the BOI systemic recommendations implemented ; (vi) An adequate level of remuneration for servants whose positions have a high level of corruption risks ensured, as well as a financial incentives mechanism for high performers is in place	(i) An indicator "Agree that ordinary people can contribute to fighting against corruption" is at least 47% (Germany level in 2021); (ii) An indicator "Willingness of citizens to report corruption" is at least 25% (Croatia level in 2021); (iii) An indicator " A decrease in the share of the population that had personal experience of corrupt behavior" to reach 17% (the level of Hungary and Lithuania in 2021); (iv) An appropriate level of remuneration for servants whose positions have a high level of corruption risks ensured, as well as a financial incentives mechanism for high performers is in place	(i) An indicator "Agree that ordinary people can contribute to fighting against corruption" is at least 64% (average level of EU countries in 2021); (ii) An indicator "Willingness of citizens to report corruption" is at least 47% (average level of EU countries in 2021); (iii) An indicator " A decrease in the share of the population that had personal experience of corrupt behavior" to reach the EU average one; (iv) A proper remuneration level for servants whose positions have high level corrupt risks , as well as a financial incentives mechanism for high performers is in place
2.4.5.	General need for funds for the goal achievement:	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing
2.4.6.	Goal connections with other directions:	digital transformation, public administration, justice	digital transformation, public administration, justice	digital transformation, public administration, justice	digital transformation, public administration, justice
2.4.7.	Description of Issue 6 to be solved under the defined analysis area:	Lack of a comprehensive mechanism for monitoring measures for reconstruction of Ukraine in connection with the military aggression of the Russian Federation, which would correspond to the principles of transparency, predictability and consistency			
2.5.	Stages:	06/2022 - 12/2022	01/2023 - 12/2023	01/2024 - 12/2025	01/2026 - 12/2032
2.5.1.	Goal 6 to be achieved to solve the problem at each stage:	Elimination of corruption risks arising during recovery measures in the course of martial law and post-war reconstruction (planning, receipt, distribution, use of funds)			
2.5.2.	Task 1. Preventing corruption abuses during provision, receipt and use of aid in the	(i) To create a procedure for monitoring the targeted use of charitable (humanitarian) aid for Ukraine, taking into account restrictions set for the period of martial law.	(i) To ensure the adoption of the Plan of Measures for Ukraine recovery, with an anti-corruption component injected in each paragraph of the Plan; (ii) To create a multilateral mechanism of supervision/control over the receipt, distribution and targeted use of aid for Ukraine; (iii) To determine transparent procurement	(i) To provide for regular assessment and reporting on the achievement of the goals set by the Recovery Plan; (ii) To ensure that Ukraine fulfills the requirements of Paris Declaration on Aid Effectiveness"	

	course of martial law period and creation of special mechanisms to minimize corruption manifestations for post-war reconstruction		<p>procedures applicable to procurement related to the post-war reconstruction of Ukraine within the framework of the Law of Ukraine "On Public Procurement" and assess their compliance with the Global Principles on National Security and the Right to Information (Tshwane Principles).</p> <p>(iv) To ensure transparency of public procurement carried out in PPPs for large infrastructure projects through implementation of the UNECE Guidelines (Standard) on a Zero Tolerance Approach to Corruption in Public-Private Procurement № ECE /CECI/WP/PPP/2017/4 of 21-22 November 2017.</p> <p>(v) To amend the Law of Ukraine "On State Secret" to create a legal basis for disclosing certain classified information and access of donors and the public to more information related to international security assistance;</p> <p>(vi) To provide for the development and adoption of appropriate amendments to regulations that will be identified as vulnerable to corruption to minimize corrupt practices in post-war reconstruction;</p> <p>(vii) To improve technology protection to boost safety and provide assurances to donors regarding compliance with their commitments to using the assistance provided for the purposes declared and that there will be no risk of its reaching third parties.</p>		
	Task 2. Improving the state audit and monitoring system to minimize corruption during post-war reconstruction of Ukraine			(i) To develop and adopt a Draft Law aimed at strengthening the independence, capacity and performance of the State Audit Office and the Accounting Chamber of Ukraine, particularly by legislating mandatory informing of: <ul style="list-style-type: none"> - law enforcement bodies - on the results of all forms of financial control of violations having signs of criminal ones; - tax authorities - on detection of offences for which financial liability is provided. 	
	Timeframe under the stage:	(i) The legislation on humanitarian aid brought in line with international standards and practices for regulating the mechanism of humanitarian response in crisis situations taking into account restrictions set for the martial law validity period.		(i) Periodic evaluation and reporting on the achievement of goals set by the Recovery Plan ensured;	(ii) Amendments to legislation aimed at consistent implementation of control measures results conducted by the Accounting Chamber and the State Audit Service adopted.
2.5.3.	Risks related to the goal achievement:	In connection with the military aggression, the humanitarian and economic consequences will significantly exceed previously expected losses	In connection with the military aggression, the humanitarian and economic consequences will significantly exceed previously expected losses		
2.5.4.	Goal	(i) Public and government reports on the use of	(i) International partners reports confirm that	Reporting on the achievement of the goals set	(i) Reports based on the Recovery

	achievement indicator:	humanitarian aid show transparency and accountability of respective organizations	Ukraine Recovery Action Plan is being implemented taking into account anti-corruption measures; (ii) Qualitative and quantitative indicators of procurement procedures are associated with post-war reconstruction (iii) The number of infrastructure projects implemented based on PPP.	by the Recovery Plan takes place regularly and according to the established criteria; Recovery Plan reports indicate consistent implementation of planned measures	Plan show consistent implementation of planned measures
2.5.5.	General need for funds for the goal achievement:	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing	(i) Within the limits of planned expenditures of the State Budget of Ukraine (ii) Within the limits of international technical assistance projects financing
2.5.6.	Goal connections with other directions:	European integration, digital transformation	European integration, digital transformation	European integration, digital transformation	European integration, digital transformation

Overcoming oligarchy

Description of problems.

One of the sources of profits generated by oligarchs is the unfair competitive advantages, in particular, restriction of competition and monopolization of certain sectors of the economy, which is achieved with the help of political influence.

To solve the aforementioned problems and minimize the influence of oligarchs, the Verkhovna Rada of Ukraine adopted the Law of Ukraine “On the Prevention of Threats to the National Security Related to the Excessive Influence of Persons Who Have Significant Economic or Political Weight in Public Life (Oligarchs)” (No. 1780-IX). This law defines the term of *oligarch*, establishes the procedure for recognising a person as having significant economic or political influence in public life (i.e. oligarch), and provides for the creation of a register of oligarchs. The Government approved the Deoligarchisation Plan, which provides for specific legal and organisational measures aimed at building a system to combat the oligarchic influence.

The EU legal system is based on ensuring greater transparency and integrity in the public sector, which provides fewer opportunities for corruption. As part of its European integration course, Ukraine undertook, in particular, to carry out a reform that would prevent threats to national security associated with the excessive influence of persons who have significant economic and political weight in public life (oligarchs), to overcome the influence of financial and industrial groups and oligarchs, especially in the financial sector and mass media (TV and radio broadcasting).

The need for further implementation of the “anti-oligarch” law (No. 1780-IX) was also emphasized in the recommendations of the European Commission when granting to Ukraine the EU candidate status.

Expected outcomes:

Restricting the excessive influence of persons who have significant economic and political weight in public life (oligarchs) on all fields of the state’s life.

Impact of the war on the defined analysis area:

The military aggression of the Russian Federation against Ukraine concentrated public attention on the obvious abuses and influence of the oligarchs, including unlimited access to the resources of the Ukrainian people.

Key challenges (in general, for the defined area):

Counteraction on the part of persons who have significant economic and political weight in public life (oligarchs).

Key possibilities (in general, for the defined area):

Increased public attention to the fight against oligarchic influence.

Political will to fight the excessive influence of persons who have significant economic or political weight in public life (oligarchs).

Key restrictions (in general, for the defined area):

Measures taken should not contradict the recommendations of the Venice Commission

2	Goals, tasks and stages of the Recovery Plan within the direction			
2.1	Description of issue 1 to be solved in the defined analysis area:	Excessive influence of persons who have significant economic or political weight in public life (oligarchs), caused by consolidation of politicians, media and big business		
2.1.1	Stages	Stage 1: 06/2022–12/2022	Stage 2: 01/2023–12/2025	Stage 3: 01/2026–12/2032
2.1.2	Goal to be achieved to solve the issue during each stage:	1. Implementation of “anti-oligarch” law 2. Strengthening capacity of Antimonopoly Committee 3. Regulation of lobbying 4. Forming a list of critical infrastructure facilities of the fuel and energy sector	5. Ensuring energy security 6. Fair transportation tariffs and protection of economic competition 7. Restriction of and control over the oligarchic influence 8. Ensuring fair and effective justice	
2.1.3	Deadline within the stage:	12/2022	12/2023	
2.1.4	Risks related to the goal achievement:	long-lasting consideration of legislative initiatives by the Verkhovna Rada of Ukraine	long-lasting consideration of legislative initiatives by the Verkhovna Rada of Ukraine; delays in goals achievement caused by hostilities and specific aspects of martial law	
2.1.5	Measurable goal achievement indicator	proper functioning of all threat prevention mechanisms established by the “anti-oligarch” law	transparent competition in the energy and transport markets; enhanced control over financial transactions and activities of oligarchs; 100% of tasks defined by the Strategy for the Development of the Justice System and Constitutional Judiciary for 2021–2023 are completed	
2.1.6	Total funding requirement for the goal achievement:			
2.1.7	Links between the goal and other directions:			
3	Current state of implementation of the programme documents relating to the relevant issue in the defined analysis area			
3.1	Title of the programme document	Brief description of the current state		Surname and name of the Group member providing the relevant information
3.1.1.	Action Plan to Prevent the Abuse of Excessive Influence by Persons Who Have Significant Economic and Political Weight in Public Life (Oligarchs), approved by Order of the Cabinet of Ministers of Ukraine No. 1582-p of 24.11.2021	Implementation is in progress		

4 Definition of tasks for the achievement of goals from paragraph 2 (for each defined goal)			
Goals. Problem 1.	Description of the task for the goal achievement	Deadline for the task	Dependence of the task on the tasks within other directions, areas and issues
Stage 1: 06/2022–12/2022			
Implementation of “anti-oligarch” law	Task 1. Developing and approving the Procedure for Conducting a Due Diligence of the Mass Media (Potential) Buyer	12/2022	
	Task 2. Developing and ensuring the operation of the Register of Persons Who Have Significant Economic and Political Weight in Public Life (Oligarchs)	12/2022	
Stage 1: 06/2022–12/2022			
Forming a list of critical infrastructure facilities of the fuel and energy sector	Task 3. Approving the list of critical infrastructure facilities of the fuel and energy sector, including privately owned facilities, and classification thereof	12/2022	
Stage 2: 01/2023–12/2025			
Ensuring energy security	Task 4. Drafting and submitting under the established procedure to the Cabinet of Ministers of Ukraine for review a draft Law of Ukraine “On Amending Certain Laws of Ukraine (Concerning Some Issues of Ensuring the Security of Electric Energy and Natural Gas Supply)”	01/2023	
	Task 5. Drafting and submitting under the established procedure to the Cabinet of Ministers of Ukraine for review a draft Law of Ukraine “On Amending Certain Legislative Acts of Ukraine As Regards the Implementation of the Provisions of the European Union Acquis on Integrity, Transparency and Prevention of Distortion of Competition in Wholesale Markets”	01/2023	
	Task 6. Energy sector integration into the political, technological, technical, economic and legal space of the EU	09/2023	
	Task 7. Approving the action plan for implementation of the Energy Security Strategy	01/2023	
	Task 8. Approving the methodology for assessing the level of threats to	01/2023	

		Ukraine's energy security		
		Task 9. Assessing the level of threats to Ukraine's energy security	01/2023	
Stage 2: 01/2023–12/2025				
	Fair transportation tariffs and protection of economic competition	Task 10. Bringing tariffs for goods transportation by rail within Ukraine to an economically reasonable level (drafting the relevant order of the Ministry of Infrastructure)	01/2023	
		Task 11. Setting economically justified rates for the transshipment of export cargo at Yuzhny Sea Trade Port SoE (introduction of a single economically justified approach to setting rates)	02/2023	
Stage 2: 01/2023–12/2025				
	Restriction of and control over the oligarchic influence	Task 12. Drafting and submitting under the established procedure to the Cabinet of Ministers of Ukraine for review a draft Law of Ukraine "On Amending Article 12 of the Law of Ukraine 'On Prevention of and Counteraction to Legalization (Laundering) of the Proceeds of Crime, Terrorist Financing, and Financing Proliferation of Weapons of Mass Destruction' Concerning the Strengthening of Control over the Activities of Oligarchs"	01/2023	
		Task 13. Drafting and submitting under the established procedure to the Cabinet of Ministers of Ukraine for review a draft Law of Ukraine "On Amending Certain Laws of Ukraine Concerning the Improvement of Mechanisms for Verification and Identification of Information on the Ultimate Beneficiary Business Entities Owned by Oligarchs"	01/2023	
		Task 14. Drafting and submitting under the established procedure to the Cabinet of Ministers of Ukraine for review a draft law on amendments to the Law of Ukraine "On Political Parties in Ukraine"	01/2023	
		Task 15. Drafting and submitting under the established procedure to the Cabinet of Ministers of Ukraine for review a draft law on amendments to the Criminal Procedure Code of	01/2023	

		Ukraine, Code of Ukraine on Administrative Offences and Law of Ukraine "On High Anti-Corruption Court"		
		Task 16. Initiating amendments to international treaties (the Energy Charter Treaty and bilateral agreements on promotion and mutual protection of investments), which provide for remedies to Ukrainian beneficial owners of companies registered in foreign jurisdictions, and their consideration when concluding new agreements on promotion and mutual protection of investments	12/2023	
Stage 2: 01/2023–12/2025				
	Ensuring fair and effective justice	Task 17. Performing the tasks envisaged by the Strategy for the Development of the Judiciary and Constitutional Justice for 2021–2023, approved by Decree of the President of Ukraine No. 231/2021 of 11.06.2021	12/2023	
		Task 18. Taking actions set forth in the Action Plan for Implementation of Strategy for the Development of the Judiciary and Constitutional Justice for 2021–2023, approved by the Legal Reform Commission	12/2023	

6 Necessary legal framework						
Subparagraph No. of paragraph 4	Title of the legal and normative act for the task from paragraph 4	Contents of the development of/ amendments to the legal and normative act	Public authority responsible for the drafting / amending of the legal and normative act	Deadline for development	Final date of entry into force	Status of the legal and normative act
Goal 2.	Draft Law of Ukraine "On Amending Certain Legislative Acts of Ukraine to Improve the Activities of the Antimonopoly Committee of Ukraine" (Reg. No. 5431)	Improvement of: economic operator inspection procedure; procedure for bringing to administrative liability for violating the requirements of legislation on the protection of economic competition;	Antimonopoly Committee (supporting at the Verkhovna Rada of Ukraine)	until law is adopted		Adopted in the first reading
Goal 2	Draft Law of Ukraine "On Amending the Code of Ukraine on Administrative Offences Concerning the Liability for Violation of Legislation on the Protection of Economic Competition" (Reg. No. 5432)	procedure for obtaining information that is, <i>inter alia</i> , a bank or notarial secrecy or information contained in tax or statistical reporting; access to automated registers, databases and other systems for collecting, storing, processing and searching for data and information; employee remuneration system; mechanisms for bringing to liability those economic operators being	Antimonopoly Committee (supporting at the Verkhovna Rada of Ukraine)	until law is adopted		Added to agenda

		a member of a group of companies that violated the requirements of legislation on the protection of economic competition				
Goal 3.	Draft Law of Ukraine "On State Registration of Lobbying Entities and Lobbying in Ukraine" (Reg. No. 3059)	Introduction of obligation as to: state registration of lobbying activities; lobbyists' reporting on all contacts and activities with the representatives of public authorities; publication of lobbying contracts and financial reports Prohibition of: payment for lobbying services in cash; combining lobbying activities with other types of activities and receiving budget funds Introduction of: public register of lobbyists; control over and liability for violation of restrictions and obligations	Ministry of Justice (supporting at the Verkhovna Rada of Ukraine)	until law is adopted		Submitted for review by the Committee
Goal 5	Draft Law of Ukraine "On Amending Certain Laws of Ukraine (Concerning Some Issues of Ensuring the Security of Electric Energy and Natural Gas Supply)"	Ensuring a systematic approach to identification and avoidance of risks pertaining to the security of electricity supply. Strengthening the institutional capacity of the Ministry of Energy in terms of ensuring the security of electricity supply (approving the schedule for repairs of generating equipment and the necessary fuel stocks, toughening the compliance obligations of producers, clarifying the mechanism for implementing the measures to prevent violations of security of supply, etc.). Strengthening the function of the State Inspectorate for Energy Supervision of Ukraine in terms of supervision of (control over) the compliance by producers, distribution system/transmission system operators and certain categories of consumers with the requirements of legal and normative acts in the field of electric energy, including by imposing fines in the event of offence in the electricity market	Ministry of Energy Ministry of Economy Ministry of Finance NEURC Antimonopoly Committee State Regulatory Service Ministry of Justice	01/2023		
Goal 5	Draft Law of Ukraine "On Amending Certain Legislative Acts of Ukraine As Regards the Implementation of the Provisions of the European Union Acquis on Integrity, Transparency and Prevention of Distortion of Competition in Wholesale Markets"	Ensuring integrity and transparency in the wholesale energy market, preventing abuses in the wholesale energy markets. Preventing abuses in the wholesale energy markets, in particular by market manipulation or insider trading. Establishing liability for the market participants for manipulation in the energy markets and insider trading. Establishing requirements and rules for transparency and integrity in the wholesale energy markets. Ensuring security of the energy resources supply and stability of energy systems, as well as transparent competition rules. Fair and competitive wholesale pricing for energy sources. Granting the Regulator the right to monitor situation in the wholesale energy markets and the ability to detect abuses and promptly respond thereto. Establishing a single database of household consumers in the electric energy and natural gas markets, containing information on consumption volumes and tariffs. Strengthening the institutional capacity of the Ministry of Energy pertaining to the formation of a policy of access to a single database of household consumers in the electric energy and natural gas markets and obtaining information therefrom	NEURC Ministry of Energy Antimonopoly Committee National Commission on Securities and Stock Market (by agreement)	01/2023		
Goal 7	Draft Law of Ukraine "On Amending Article 12 of the Law of	Establishing an enhanced control over financial transactions and activities of oligarchs.	Ministry of Finance Ministry of Justice	01/2023		

	Ukraine ‘On Prevention of and Counteraction to Legalization (Laundering) of the Proceeds of Crime, Terrorist Financing, and Financing Proliferation of Weapons of Mass Destruction’ Concerning the Strengthening of Control over the Activities of Oligarchs”	Inclusion of oligarchs in the list of high-risk clients of the primary financial monitoring entities. Expanding the list of clients to be classified by the primary financial monitoring entities as high-risk clients	MDT, State Financial Monitoring Service National Commission on Securities and Stock Market (by agreement) National Bank (by agreement)			
Goal 7	Draft Law of Ukraine “On Amending Certain Laws of Ukraine Concerning the Improvement of Mechanisms for Verification and Identification of Information on the Ultimate Beneficiary Business Entities Owned by Oligarchs”	Improving the mechanism for verification and identification of information on the ultimate beneficial owners of economic operators belonging to oligarchs	Ministry of Finance Ministry of Justice Ministry of Digital Transformation State Financial Monitoring Service National Bank (by agreement) National Commission on Securities and Stock Market (by agreement)	01/2023		
Goal 7	Draft Law of Ukraine amending the Law of Ukraine “On Political Parties in Ukraine”	Returning the reporting by political parties on property, income, expenses and financial obligations. Introducing a new mechanism for distribution of budget funds to financially support the parties that did not achieved the established electoral threshold at the elections of the People’s Deputies of Ukraine. Establishing a comprehensive list of prohibited expenditures from the State Budget for political parties. Determining priority directions for the use of such funds. Eliminating the possibility of making contributions in favour of political parties by individuals having no sufficient legal income to make such contributions	National Agency on Corruption Prevention Central Election Commission (by agreement)	01/2023		
Goal 7	Draft Law of Ukraine amending the Criminal Procedure Code of Ukraine, Code of Ukraine on Administrative Offences and Law of Ukraine “On High Anti-Corruption Court”	Ensuring inevitability of criminal and administrative liability for political corruption. Attributing the criminal offence under Article 159-1 of the Criminal Code of Ukraine to the investigative jurisdiction of the National Anti-Corruption Bureau and judicial jurisdiction of the High Anti-Corruption Court. Determining the grounds for bringing to administrative liability for violation of rules, prohibitions and restrictions in the field of political party funding and financial reporting; attributing the consideration of this category of cases to the judicial jurisdiction of the High Anti-Corruption Court. Establishing a ban on exemption from administrative liability for minor offences involving corruption. Improving the procedure for drawing up protocols on administrative offences and production of copies thereof. Granting the status of a participant in court proceeding to a person who drew up a protocol on administrative offence	National Agency on Corruption Prevention National Anti-Corruption Bureau High Anti-Corruption Court (by agreement)	01/2023		

ANNEX

**The List of Bills
required for Anti-Corruption Policy Section implementation**

# of the log frame clause	Legal act name	Description of the legal act development/amendments	State body responsible for the legal act development/amendments	Development timeframe	Deadline for entry into force	Legal act status
2.2.2.	The Draft Law "On the State Budget for 2023"	<ul style="list-style-type: none"> - To provide appropriate expenses for financing measures for the Anti-corruption Strategy; implementation - To ensure proper financing of NABU, NACP, HACC, ARMA 	VRU		01.01.2023	
2.1.2.	The package of Laws of Ukraine on Amendments to Some Legislative Acts To Align the National Legislation of Ukraine with International Acts in the Field of Preventing and Combating Corruption	<p>To ensure full compliance of Ukrainian with the requirements and recommendations of:</p> <ul style="list-style-type: none"> - UN Convention against Corruption; - Criminal Law Convention on Corruption, its Additional Protocol; - Civil Law Convention on Corruption; - OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. - Convention on the Protection of the European Communities' Financial Interests and Directive 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law; - OECD Istanbul Anti-Corruption Action Plan of Anti-Corruption Network for Eastern Europe and Central Asia); - Conference of UNCAC member states; - Recommendations on preventing and combating corruption provided to Ukraine within the framework of international monitoring mechanisms (GRECO assessment, the Istanbul Anti-Corruption Action Plan implementation monitoring, the UN Convention against Corruption implementation monitoring) 	VRU, NACP		31.12.2023	

2.1.2.	Laws of Ukraine on Amendments to the Criminal Procedure Code and the Law of Ukraine "On Prevention of Corruption" regarding Improving the Effectiveness of Prosecution for Corruption Criminal Offenses	<ul style="list-style-type: none"> - To provide for the pre-trial investigation procedures effectiveness as well as judicial review of criminal proceedings, particularly regarding pre-trial investigation terms; application of special pre-trial investigation and court proceedings procedures (in absentia); - To ensure reasonable terms and discipline of all participants in criminal proceedings; the grounds and procedure for concluding plea agreements and their legal consequences, etc. - clarification of the list of subjects of declaration taking into account corruption risks assessment results, grounds for verifying declarations, elimination of gaps regarding declarations submission deadlines, clarification of the procedure for declarations verification 	VRU, CMU		31.12.2023	
2.1.2.	The Law of Ukraine "On Ratification of the OECD Convention on Combating Bribery of Foreign Officials in International Business Transactions	Accession to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions	VRU	01.03.2024	31.12.2024	
2.1.2.	The Law of Ukraine "On Amendments to Some Legislative Acts to Introduce Managers Liability for Non-Compliance with the Requirements of the Legislation on Bringing of Anti-Corruption Legislation Violators to Disciplinary Responsibility	To establish disciplinary and administrative responsibility of managers for failure to fulfill legislation requirements regarding bringing anti-corruption legislation violators to disciplinary responsibility.	VRU, NACP	01.06.2024	01.06.2025	
2.1.2.	The Law of Ukraine on Bringing Criminal and Criminal Procedure Legislation to International Standards Regarding Liability for Corruption Criminal Offenses	<ul style="list-style-type: none"> - bring the list of foreign officials into compliance with the standards of the OECD Convention on Combating Bribery of Foreign Officials in International Trade Transactions; - bring provisions on exemption from criminal liability in accordance with the international standards pursuant to Part 5 of Art. 354 of the Criminal Code of Ukraine (in terms of immediate notification of a crime and the impossibility of applying this provision to the person who initiated provision of an unlawful benefit); - to envisage that persons who have ceased activities related to performing functions of the state or local self-government functions, upon cessation of such activities, may be held criminally liable for illegal enrichment - other necessary amendments 	VRU		31.12.2024	

2.1.2.	The Law of Ukraine "On Bringing the National legislation in Line with the EU Directive 2019/1937	To bring the national legislation in line with the EU Directive 2019/1937, taking into account the experience of establishing an institution for whistleblowers protection in Ukraine.	NACP, VRU		31.12.2028	
2.1.2.	The Law of Ukraine "On Amendments to Some Legislative Acts to Improve the Mechanism for Collecting, Processing, and Publishing Statistical Information on Detection of Corruption and Corruption-Related Offenses, Conducting of Proceedings, Searches, and Return of Assets Obtained from Corruption and Other Crimes	(i) To provide for the introduction of a unified system of collection, processing and publication of statistical information on detection of corruption and corruption-related offenses, implementation of proceedings in relation to them, searches and return of assets obtained from corruption and other crimes.		01.03.2024	31.12.2024	
2.1.2.	The Law of Ukraine "On Amendments to Some Legislative Acts to Improve Provisions Related to Conflict of Interests Settlement	- To improve the procedure for identifying and resolving conflict of interests, including in connection with corporate rights; - To regulate gifts receipt policy; - To regulate the definition of the concept of "other paid activity" for the purposes of the Law "On Prevention of Corruption"		01.03.2024	31.12.2024	
2.1.2.	The Law of Ukraine "On Amendments to the Law of Ukraine "On the Status of a People's Deputy of Ukraine" regarding the ethical conduct of members of Parliament	- to establish the ethical conduct of People's Deputies of Ukraine; - To settle the legislative lobbying issue.	VRU	31.12.2024	31.12.2025	
	Law of Ukraine "On Lobbying"	To settle the lobbying issue	VRU			
2.1.2.	The Law of Ukraine "On Amendments to Some Legislative Acts to Implement Financial Control Measures During Martial Law"	- To legally restore the obligation of political parties to submit reports on property, income, expenses and liabilities of a financial nature - To amend the Law of Ukraine "On Amendments to Certain Laws of Ukraine Regarding the Functioning of the Civil Service and Local Self-Government during the Period of Martial Law" dated May 12, 2022 No. 2259-IX regarding resumption of special verifications of candidates - resumption of financial control measures with prevention of gaps in submitting declarations	VRU	01.09.2022	31.12.2022	

2.1.2.	The Law of Ukraine “On Improvement of Political Parties Financing Mechanism and Control over It”	- To improve the political parties financing mechanism and its control, taking into account recommendations and standards of the Council of Europe, GRECO, the Venice Commission (particularly, in matters of state financing of non-parliamentary political parties; indirect state support of political parties; clear demarcation of functions of controlling bodies; introduction of effective, deterrent and proportional sanctions for violation of established requirements)	NACP, VRU	30.6.2023	31.12.2023	
2.2.2. 2.3.2.	Laws of Ukraine “On Amendments to Some Legislative Acts to Improve the Activities of the National Anti-Corruption Bureau of Ukraine, the Specialized Anti-Corruption Prosecutor’s Office, the Asset Recovery and Management Agency”	(i) To improve the legislation on NABU activities: - to clarify the maximum number of NABU employees; (ii) To improve the legislation on the SAPO activities: - to expand SAPO institutional and operational autonomy; - expand SAPO management team powers; - to review the selection procedure for SAPO administrative positions as well as the respective competition commission composition; - To introduce the procedure for an external independent SAPO performance effectiveness assessment. (iv) To improve the legislation on ARMA activities: - to guarantee the institutional and operational independence of ARMA; - to introduce an effective procedure for external independent SAPO performance effectiveness assessment; - to improve the selection procedure of ARMA Head for the sake of transparency, objectivity of selection based on merits of candidates.	NABU, VRU		31.12.2022	
2.5.2	The Draft Law “On amendments to Some Legislative acts of Ukraine to Strengthen Independence, Capacity and Effectiveness of the State Audit Service and the Accounting Chamber of Ukraine”	The Draft Law is aimed at strengthening the independence, capacity and effectiveness of the State Audit Service and the Accounting Chamber of Ukraine, particularly through the legislative enshrinement of mandatory informing of: - law enforcement bodies - based on the results of all forms of financial control about detected violations having criminal signs; - tax authorities - detection of offenses for which financial responsibility is provided	CMU, VRU	01.03.2023	31.12.2023	

2.5.2	The Draft Law "On Amendments to Some Legislative Acts of Ukraine to Improve the System for Receiving and Distributing Humanitarian Aid	(i) To amend the Law "On Humanitarian Aid" to bring this Law in conformity with international standards and practices and regulate the mechanism of humanitarian response in crisis situations (under extraordinary circumstances). (ii) To amend the Law "On the Legal Regime of Martial Law " to regulate military administrations powers in terms of providing humanitarian aid. (iii) To improve the procedure for distributing and targeted use of charitable (humanitarian) aid for Ukraine.	CMU, VRU		01.12.2022	
2.5.2	The Law of Ukraine "On Amendments to Some Laws of Ukraine to Improve the Public Procurement Procedure Related to Recovery of Ukraine from Consequences of the War"	(i) To determine transparent procurement procedures applicable to procurement related to the post-war reconstruction of Ukraine within the framework of the Law of Ukraine "On Public Procurement" and assess their compliance with the Global Principles on National Security and the Right to Information (Tshwane Principles). (ii) To ensure transparency of public procurement carried out in PPPs for large infrastructure projects through implementation of the UNECE Guidelines (Standard) on a Zero Tolerance Approach to Corruption in Public-Private Procurement № ECE /CECI/WP/PPP/2017/4 of 21-22 November 2017.	CMU, VRU	01.09.2022	01.12.2022	
2.4.2	The Law of Ukraine "On the Business Ombudsman Institution"	(i) To legislatively regulate the Business Ombudsman Institution activities, which will contribute to the reduction of state bodies malpractice and promote business integrity standards	CMU, VRU			
2.4.2	The Law of Ukraine "On Amendments to Some Laws of Ukraine to Encourage the Private Sector to Improve Business Integrity"	To amend the legislation introducing incentives for the private sector to improve business integrity, particularly through the obligation to adopt ethical codes and corporate governance rules.	CMU, VRU	01.06.2024	01.06.2025	
2.3.2	The Law of Ukraine "On Amendments to Some Laws of Ukraine to Introduce a Centralized Register of Bank Accounts and Safe Deposit Boxes	To introduce a centralized register of bank accounts and safe deposit boxes in accordance with the requirements of the Directive (EU) 2018/843.	CMU, VRU	01.09. 2022	1.12.2022	

2.3.2	The Law of Ukraine "On Amendments to Some Laws of Ukraine to Simplify the Procedure for Submitting Information Required for Financial Monitoring	To simplify the procedure for submitting information required for financial monitoring	CMU, VRU	01.09.2022	1.12.2022	
2.3.2	The Law of Ukraine "On Amendments to Some Laws of Ukraine to Improve the System for Preventing the Use of the Financial System for Money Laundering and Terrorist Financing	Amendments which will fully align the national legislation with the Financial Action Task Force (FAFT) with the recommendations, taking into account the evaluations and opinion of MONEYVAL, Directive (EU) 2015/849 of the European Parliament and of the Council of May 20, 2015 (as subsequently amended).	CMU, VRU	01.06.2024	01.06.2025	
2.3.2	The Draft Law on Amendments to Some Laws of Ukraine to Improve Mechanisms for Verifying Information on Ultimate Beneficial Owners and the Ownership Structure of Legal Entities	To implement an effective procedure for the verification of the ultimate beneficial owners of legal entities, as well as strengthen sanctions for failure to submit or submission of inaccurate information regarding ultimate beneficial owners	VRU		31.12.2023	The Draft Law was registered in the Verkhovna Rada under the No. 6003 dated September 7, 2021
2.1.2.	The Law of Ukraine "On Legal Acts"	To determine types and legal force of legal acts; To establish requirements for the procedure for their preparation, adoption and entry into force, rule-making technique, interpretation, accounting and systematization; regulate the procedure for overcoming gaps and contradictions	VRU	01.06.2023	31.12.2023	
2.4.2.	The Draft Law "On Amendments to Some Legislative Acts of Ukraine to Improve Corporate Governance of Legal Entities whose Shareholder (Founder, Participant) is the State		VRU		02.05.2023	The Draft Law was registered in the Verkhovna Rada under No. 5593-d of July 6, 2021