

PREVENTING AND COMBATING CORRUPTION IN UKRAINE

DIGEST N°62

AUGUST 6 – AUGUST 13, 2025

STATE ANTI-CORRUPTION POLICY

Military personnel will be able to become whistleblowers on corruption in the Armed Forces of Ukraine (AFU): The Cabinet of Ministers submitted to the Parliament a [draft law](#) on amending the Disciplinary Statute of the AFU to ensure guarantees for the protection and rights of military personnel who report possible instances of corruption or corruption-related offenses, or other violations of the Law of Ukraine "On Prevention of Corruption." It proposes to expand the ability of military personnel to report corruption to a commander without consequences for themselves.

The adoption of this draft law is provided for by the State Anti-Corruption Program for 2023-2025, and is also part of fulfilling the requirements of the Organisation for Economic Co-operation and Development (OECD). The National Agency on Corruption Prevention (NACP) [contributed](#) to its development and provided recommendations to ensure the proper protection of military whistleblowers, which were fully taken into account.

WORK OF THE ANTI-CORRUPTION SYSTEM

The National Anti-Corruption Bureau of Ukraine (NABU) and the Specialized Anti-Corruption Prosecutor's Office (SAPO) estimated the economic effect of their activities at over UAH 1.5B. The report for the first half of 2025 states that 370 investigations were launched during this period. In particular, for the first time in the history of NABU and SAPO, an incumbent Vice Prime Minister of Ukraine was exposed for corruption. In addition, they successfully conducted the "Clean City" special operation regarding land corruption in Kyiv, and also exposed schemes of price inflation and embezzlement in the Ministry of Defence of Ukraine amounting to hundreds of millions of hryvnias. Detailed information can be found in the NABU and SAPO report at the [link](#).

Full declaration audits for July 2025: The National Agency on Corruption Prevention (NACP) identified violations totaling over UAH 192M. The Agency reports the completion of 83 full declaration audits, with a violation identified in each one. In particular, 42% of them show signs of false information or unjustified assets. The NACP forwarded dozens of substantiated conclusions to the competent authorities. They became the basis for criminal proceedings, particularly concerning people's deputies, regional deputies, and officials from the customs, tax, medical, and educational sectors. In total, over the first seven months of 2025, the NACP completed 567 full declaration audits, identifying violations in 563 of them.

USD 1.3M for winning a military housing construction tender: NABU and SAPO notified a Ministry of Defence of Ukraine official of suspicion. According to the investigation, the acting head of one of the Ministry's Central Territorial Directorates offered to ensure victory in a tender for the construction of a building for military personnel in the Sviatoshynskiy district of Kyiv. To implement the plan, he involved other individuals and valued the "services" at USD 1.3M. After receiving a portion of the funds in June 2025, the accomplices to the crime were exposed.

The High Anti-Corruption Court (HACC) refused to suspend the current Head of the Antimonopoly Committee from office. It is noted that this decision is not subject to appeal. At the same time, the court granted another motion from the SAPO prosecutor and obliged the accused, until October 11, to appear before the prosecutor and the court upon every request, not to leave Ukraine without permission, and to report any change of residence, etc. As a reminder, the current Head of the Antimonopoly Committee of Ukraine is [accused](#) of illicit enrichment of over UAH 72M and declaring inaccurate information.

PERSONNEL APPOINTMENTS AND COMPETITIONS

The High Council of Justice (HCJ) appointed Ihor Kushnir as a member of the High Qualification Commission of Judges of Ukraine (HQCJ). The decision was made based on the results of a competitive selection process, following interviews with candidates and an analysis of their dossiers, in accordance with the requirements of the Law of Ukraine "On the Judiciary and the Status of Judges." The discussion and development of a candidates' list for appointment as a member of the HQCJ is conducted confidentially and is not subject to public disclosure. When appointing a candidate as a member of the HQCJ, the HCJ applies the principle of positive selection (i.e., not issuing negative conclusions about candidates who did not advance to the next stage).

Thus, the HCJ has now completed the composition of the HQCJ, which comprises 16 members in total. The implementation of judicial reform, which includes completing the HQCJ's composition, is one of the key elements in [fulfilling Ukraine's commitments](#) to the EU in the area of the rule of law.

The Head of the EU Delegation to Ukraine, Katarína Mathernová, [welcomed](#) the appointment of the new HQCJ member by the High Council of Justice. She also expressed hope for future progress in this area.

MEDIA ABOUT CORRUPTION

"The State Bureau of Investigation (SBI) served Vitaliy Shabunin with an updated notice of suspicion in the Kharkiv region," this was [reported](#) by the Anti-Corruption Action Center (AntAC). It is noted that the previous legal classification of the crime was not changed, nor were other articles added to the notice of suspicion. However, the circumstances of the case were changed, which AntAC considers to be politically motivated persecution for criticism of the authorities. Previously, Shabunin was notified of suspicion of

alleged evasion of military service and fraud. According to the Bureau's version, Shabunin evaded service, while carrying out an order from his commander, who had sent him on a temporary assignment, AntAC notes. And the fraud, in the prosecution's opinion, consists of receiving a service member's salary while actually serving. The Anti-Corruption Action Center emphasizes that these accusations are absurd and are intended to intimidate Shabunin and AntAC, as well as to create a precedent for future cases based on the same charges.

"Why the participation of international experts in key selections is important." In a column for the media outlet "Ukrainska Pravda," Kateryna Ryzhenko, the Deputy Executive Director for Legal Affairs of Transparency International Ukraine, [notes](#) that the participation of international experts in selections for key justice bodies is one of the most important safeguards for ensuring their independence. In June 2025, the mandate of the first composition of the Selection Commission, which had selected the members of the HQCJ, ended, and under the current law, international experts will no longer participate. This signal could trigger a chain reaction of phasing out the international experts in other competitions, jeopardizing the progress achieved in reforms, the author emphasizes. According to her, deputies can save the HQCJ competition by supporting draft law No. [13382](#), which proposes to extend the term of international experts so that they can also select the next composition of the HQCJ in 2027. The opportunity to pass such a law will arise in August, when the Parliament convenes for its plenary sessions.

"Head of the HACC Staff: I hope that in a year we will be reporting on judges successfully appointed to us." In an interview with the Interfax-Ukraine news agency, Bohdan Kryklyvenko [explained](#) that the failure to appoint new judges to the High Anti-Corruption Court (HACC) hindered the fulfillment of conditions for the Ukraine Facility program and resulted in Ukraine losing financial aid. According to him, the main reasons for the selection's failure included an overly complex procedure, numerous organizational errors, and a flawed methodology for evaluating candidates, particularly regarding the practical assignments. He noted that the HACC does not participate in the selection of judges; this is handled by the HQCJ, the HCJ, and the Office of the President. After the selection rules were changed, the competition was announced again. The submission of documents ended on August 6, and the commission is to begin its work: there are currently 205 applications for 23 judicial vacancies. It is expected that by July 2026, the HACC will welcome new judges, whom it has long needed due to an excessive workload.

"Europe without options. Why Zelensky returned to the anti-corruption course and what will happen with the path to the EU." The media outlet "European Pravda" [notes](#) that after an attempt to weaken the independence of anti-corruption bodies in July 2025, President Zelensky sharply changed his rhetoric due to the threat of a halt to Ukraine's EU accession negotiations. Furthermore, against this backdrop, the so-called "decoupling", separation of Ukraine and Moldova on their path to the EU, became almost inevitable. For Zelensky, the issue of European integration is a key element of his "political legacy," so he was forced to retreat and return to supporting the anti-corruption course to avoid isolation and a strategic defeat.

"Rebooting the ESBU: 10 challenges for the Bureau's new Director." In a column for "Ukrainska Pravda," Kateryna Butko and Tetiana Zakopailo from the "Automaidan" All-Ukrainian Union [note](#) that the appointment of Oleksandr Tsyvinskyi as Director of the Economic Security Bureau of Ukraine (ESBU) became a symbol of hope for reform after a long period of the institution's discreditation. The authors highlight ten main tasks facing the new ESBU Director, such as ensuring the Bureau's political independence, conducting an audit and re-attestation of its personnel, combating the shadow economy and the embezzlement of international aid, establishing cooperation with partners and business, a real increase in budget revenues, and others. The successful implementation of these steps, according to the authors, will be a key factor in restoring the trust of society and the international community in the ESBU.