

# PREVENTING AND COMBATING CORRUPTION IN UKRAINE

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## STATE ANTI-CORRUPTION POLICY

**National Anti-Corruption Bureau of Ukraine (NABU) and Specialized Anti-Corruption Prosecutor's Office (SAPO) urge MPs not to vote for bill No. 12439** due to potential obstacles it would create to investigating high-level corruption. Specifically, the document legalizes the substitution of court decisions with arbitrary interpretations by officials and complicates urgent searches in bribery cases without a judge's warrant. The anti-corruption bodies believe that these changes would contradict the Constitution, weaken accountability for corruption, and threaten the effectiveness of investigations.

Officially, the bill aims to create “additional protections for businesses during criminal proceedings”. However, non-governmental organization Transparency International Ukraine (TI Ukraine) [notes](#) that this bill creates new loopholes for corrupt officials under the pretext of protecting business. TI Ukraine also highlights the closed nature of the Parliament's Law Enforcement Committee, as all requests to include the organization's representatives in its discussion of the bill have been ignored. “The committee continues the same shameful practice as when it approved the scandalous bill No. 12414 behind closed doors in July, without including the public or even some committee members,” says TI Ukraine.

**Government authorities have completed almost 46% of measures outlined in the State Anti-Corruption Program (SAP)**, according to the ninth quarterly monitoring report by the National Agency on Corruption Prevention (NACP) on implementation of SAP measures for 2023-2025. Key achievements include the external audit of NABU activities, which independent experts recognized as “moderately effective”; as well as the preparation and publication of summaries of Supreme Court case law on corruption cases for 2022-2024, which contributes to the consistency and predictability of court decisions. SAP implementation progress can be tracked in the [Information System for Monitoring the Implementation of State Anti-Corruption Policy](#).

**September 1 marked the launch of the Transparency Register, a public platform created by the NACP to record, monitor, and publish data about lobbying entities.** The [Register's](#) launch coincided with the Law “[On Lobbying](#)” entering into force. From now on, individuals who influence the legislative process are required to register, submit reports, and maintain up-to-date information through an electronic portal. As NACP Chairman Viktor Pavlushchuk [noted](#), the Transparency Register's launch makes it possible for businesses to openly influence government decisions through registered and

transparent lobbying activities. He also added that this tool will allow the state to better engage the private sector in open dialogue and consider business interests during policy development; while for society, it guarantees that government decision-making will include broad public discussion. “Institutionalization of lobbying is a fundamental step to ensuring that public policy in Ukraine is shaped honestly, transparently, and in accordance with European standards”, Pavlushchyk emphasized. The Register has a public section with open access to reports and statistics, and became the first system to pass security authorization under new national standards.

## DIGITAL TRANSFORMATION

**The Ministry of Digital Transformation of Ukraine presented a test version of the new “e-Notary” online service.** This electronic ecosystem, which unites all notarial registers on a single secure platform, aims to automate notarial processes and increase transparency in this field. Thanks to “e-Notary”, notaries' work will become faster, and the risk of accidental errors in documents will be minimized. Additionally, every Ukrainian, regardless of their location (in Ukraine or abroad), will be able to receive key notarial services online, to be introduced in the Diia app by 2026. As noted by the Ministry of Digital Transformation, “e-Notary” is yet another signal to the world that Ukraine is among the leaders in the field of digitalization.

## WORK OF THE ANTI-CORRUPTION SYSTEM

**NABU and SAPO exposed a high-ranking official of the Security Service of Ukraine (SSU) for illegal enrichment and declaring false information.** According to the investigation, in December 2023, the official purchased an apartment for UAH 21.6M, registering it under a family member's name, despite the stated contract price of UAH 12.8M. The source of funds was listed as income from consulting services provided to individuals and companies connected to a suspect in the case of embezzlement of “Ukrzaliznytsia” funds. However, the investigation determined that these services were not actually provided, and that the companies showed signs of being fictitious. The origin of UAH 8.8M remains completely unverified.

The SSU **stated** that they viewed the suspicion notice to Illia Vitiuk as a response to the Service's earlier arrest of several NABU employees, in late July this year. Investigative journalist Yevhenii Shulhat, who had **discovered** Vityuk's undeclared property last year, **questioned** SSU's stance, noting that the apartment in question has been under arrest by the High Anti-Corruption Court for over a year.

**Over UAH 7M may be seized from the Police Anti-Corruption Department Head.** Following a lifestyle monitoring **investigation** of the Head of Kyiv's Anti-Corruption Organized Groups Department of the National Police, the NACP determined that in 2021-2023, he and his close relatives purchased several expensive vehicles and

accumulated significant cash assets without proper financial justification, as well as received funds from unidentified sources. Despite explanations about loans and gifts, the NACP found that these assets could not have been acquired legally. The Specialized Anti-Corruption Prosecutor's Office (SAPO) has filed a lawsuit with the High Anti-Corruption Court (HACC) to seize over UAH 7M in unjustified assets to the state budget.

## MEDIA ABOUT CORRUPTION

### **“People with cardboard signs defended the independence of SAPO and NABU. Much work remains, including solving their internal issues and making them exemplary. Seven challenges to overcome.”**

In its article, Ukrainian socio-political media outlet “Babel” [notes](#) that while Ukraine's anti-corruption system has maintained its independence from government influence over ten years of operation, it has also accumulated several internal problems preventing it from becoming exemplary. Key challenges include: imbalance in the working relationship between NABU detectives and SAPO prosecutors; formal approach to competitive selection of some NABU and SAPO representatives; prosecutors' dependence on the SAPO head, which the latter may abuse; poor quality and dependant internal control function in both bodies; use of plea bargains to preserve reputation instead of imposing real punishment; and questionable practices of calculating “lost profits” as damages. The article emphasizes that independence means increased responsibility; NABU, SAPO, and HACC must adhere more strictly to the principles of the rule of law and internationally recognized human rights than other law enforcement agencies. Civil society organizations, in turn, must monitor that anti-corruption bodies do not violate these principles.

### **“Relatives with russian passports and trips to Russia. How an SSU General fabricated russian connections for a NABU detective while overlooking them in his own family.”**

An investigation by the Anti-Corruption Action Center (AntAC) [revealed](#) that SSU General Serhiy Duka, who oversaw high-profile operations against NABU detectives and investigative journalists, himself has close family ties with individuals connected to Russia. The report notes that he was entrusted with finding “connections to Russia” among NABU representatives, particularly in the case of detective Ruslan Magamedrasulov, while his wife's parents, natives of Dagestan, had obtained russian passports back in 2022, used them for direct travel to the russian federation, maintained accounts in russian banks, and registered their agribusiness in russian registries. This calls into question Duka's impartiality and integrity, especially given his role in politically sensitive cases against representatives of anti-corruption bodies, AntAC emphasizes.

### **“Corruption back-office at ESBU? Okay. If anyone tries to test their luck, I have excellent relations with NABU.”**

The newly appointed Director of the Economic Security Bureau of Ukraine (ESBU) Oleksandr Tsyvynskyi, gave an [interview](#) to a reputable Ukrainian media outlet, “Dzerkalo Tyzhnia”, where he outlined his vision for rebooting the ESBU, which, in his opinion, has remained a carbon copy of the tax police since its

creation and has not developed a new working philosophy. He plans to build the institution on four principles: work in specific territories (communities, districts, or regions) to improve the business environment's "friendliness" there; systematic interaction with entrepreneurs; preventive analytics based on big data; and law enforcement actions based on facts, not emotions. Tsyvinskyi predicts that the planned recertification of current employees (nearly 1,300) as part of the ESBU reform procedure will take about 1.5 years. The Bureau will also need to recruit new personnel through transparent procedures involving international representatives (the law envisages 4,000 ESBU employees). Additionally, to increase the ESBU's effectiveness, it is important to ensure equal pay with other special agencies and provide the Bureau with tools for independent and secure operations. According to Tsyvinskyi, it is important to measure the ESBU's effectiveness not only by punishment statistics but also by real growth in tax revenue thanks to the elimination of schemes and changes to the rules of the game. He also promised to publicly report any attempts at political or corrupt pressure.

**“Corruption is the main obstacle to Ukraine's reconstruction, 75% of citizens consider it the biggest problem,”** according to a public [survey](#) by "Active Group" dated August 2025. Although almost half of the respondents consider recovery progress to be positive, respondents also identify bureaucracy, war, insufficient funding, and actions of local authorities as key problems. To improve the situation, most Ukrainians support strengthening anti-corruption efforts, controlling expenses, and ensuring tender transparency. They also consider restoration of housing, job creation, and support for small businesses to be the main priorities for reconstruction.