

Transparency International Ukraine

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MAKING UKRAINE STRONGER





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In 2024, despite the war, we continued to defend transparency and integrity as the foundation of European integration and a corruption-free state. We launched new products, uncovered procurement violations, and strengthened our analytical and advocacy capabilities. I am grateful to all our partners and team members – together, we are making Ukraine stronger.

Andrii Borovyk,

Executive Director of Transparency International Ukraine

Key achievements

24 in-depth studies

27 legal analyses

Created the HACC Decided platform – a tool for tracking all high-level corruption cases

Our recommendations on anti-corruption policy and public procurement were acknowledged by the European Commission and the IMF

Contributed to launching the reform of the Accounting Chamber

Promoted transparency and sustainability in cities through research and data-based recommendations

UAH 2 billion saved for the budget through public monitoring of public procurement

UAH 1.5 million in assistance was provided to the Armed Forces of Ukraine

An effective state anti-corruption policy

core
activities



Outlined the scope of anti-corruption efforts in the Shadow Report for the European Commission

Monitored the selection process for the Head of the National Agency on Corruption Prevention

Launched the HACCC
Decided platform to track high-level corruption cases



An effective state anti-corruption policy

- ➔ **Developed the foundation for the legislative implementation of the ARMA reform** TI Ukraine's advocacy efforts included [legal analysis](#) of draft laws proposed by the Parliament and the Government, as well as communication and coordination with the authors of these regulations prior to their registration. Representatives of the organization also took part in public discussions of draft laws held by the Parliamentary Committee on Anti-Corruption Policy – most of our proposals were eventually incorporated into the regulation adopted by the Parliament.
- ➔ **Analyzed every stage of the selection process for the new Head of the NACP.** Monitored the [progress of the competition](#), communicated with the selection Commission, conducted a [detailed analysis](#) of all candidates and the 10 finalists admitted to the interviews, and shared the results with the Commission responsible for selecting the Head of the NACP. Our public materials on the competition received over 80,000 views.
- ➔ **Continued to monitor the work of the High Anti-Corruption Court.** In addition to launching the [HACC Decided](#) platform, we updated the methodology for monitoring the work of the HACC and expanded the list of top corruption cases covered. By the end of 2024, our monitoring included 98 proceedings. In total, our monitors attended 926 court hearings in 2024. Presented the [fifth report](#) based on the results of monitoring the work of the HACC.
- ➔ **Monitored the progress of the competition for selecting new judges of the HACC and HACC AC.** Advocated legal amendments to improve this selection. In particular, TI Ukraine experts [analyzed](#) and provided recommendations on draft laws No. 11425 (on updating the requirements for cognitive testing) and No. 11426 (on expanding the powers of the PCIE). Some of our comments were reflected in the final versions of the laws.
- ➔ **Provided recommendations for improving the investigation and judicial review of high-level corruption cases.** Analyzed and took part in discussions on [legislative amendments to update the concept of plea agreements](#) in high-level corruption cases; some of our proposals were incorporated into the adopted version of the law. Continued to [advocate](#) for a comprehensive solution to the issue of pre-trial investigation time limits, including the cancellation of the "Lozovy amendments."



An effective state anti-corruption policy

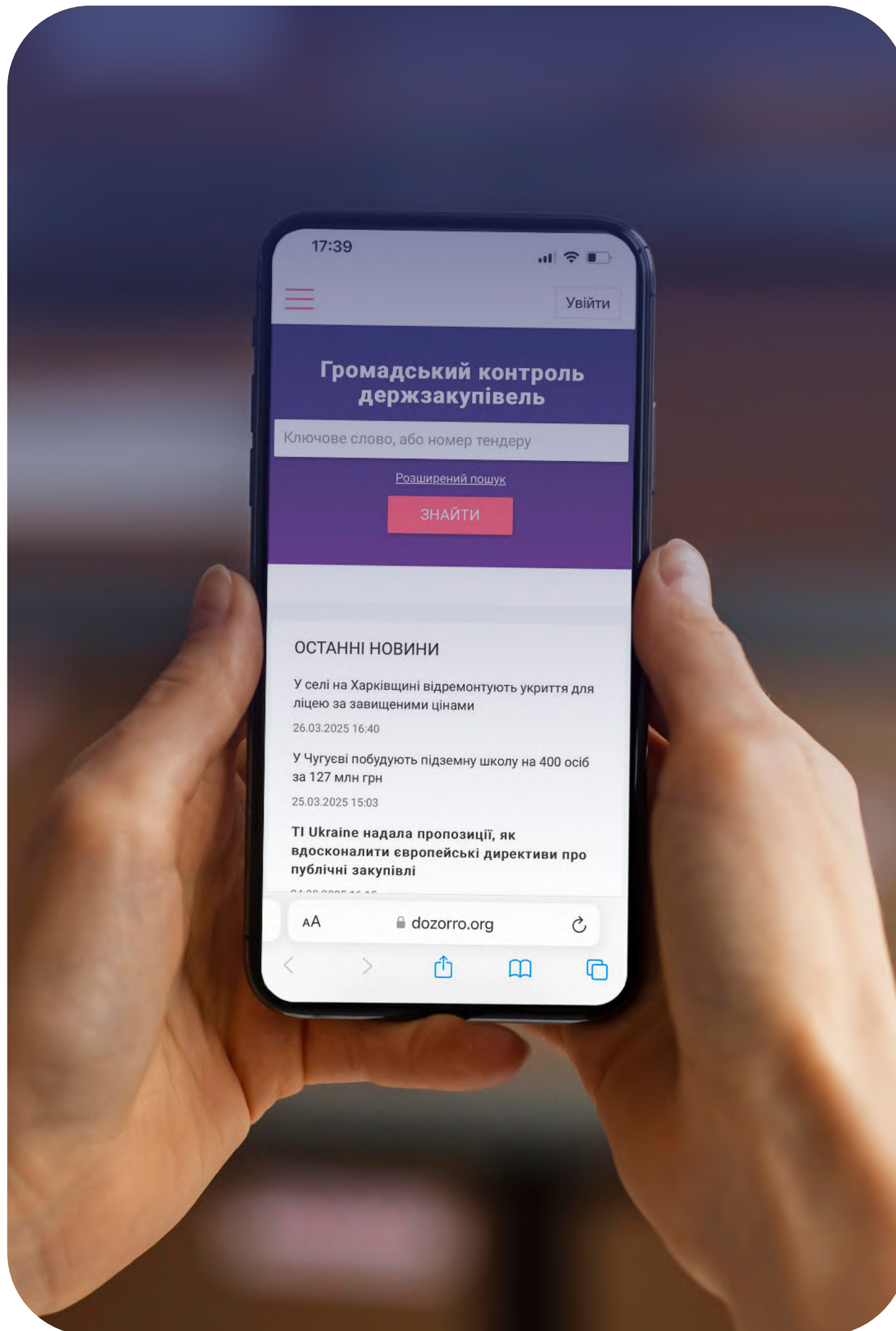
core
activities

- ➔ **Conducted the first study on the implementation of civil confiscation in Ukraine.** As part of [this study](#), we identified the main challenges in applying civil confiscation over five years of the mechanism's operation and provided recommendations for improving its effectiveness.
- ➔ **Analyzed the effectiveness of the iCase system implementation.** In the corresponding [analytical note](#), we outlined the preliminary results following the launch and use of the electronic criminal proceedings system and identified opportunities for expanding its application during pre-trial investigations and judicial reviews. All the recommendations we prepared received strong support from criminal justice authorities and international partners.
- ➔ **Assessed the quality of the NACP's analysis of asset declarations.** TI Ukraine experts analyzed 200 certificates published by the NACP based on the results of declaration checks conducted from January to June 2024, and also reviewed public officials' declarations available in the Unified State Register of Declarations.



Efficient and transparent public procurement system

core
activities



UAH 2 billion
saved for the budget
through public
monitoring of public
procurement

DOZORRO

Joined the develop-
ment of the new Law
on Public Procurement

Contributed to launching
the reform of the
Accounting
Chamber



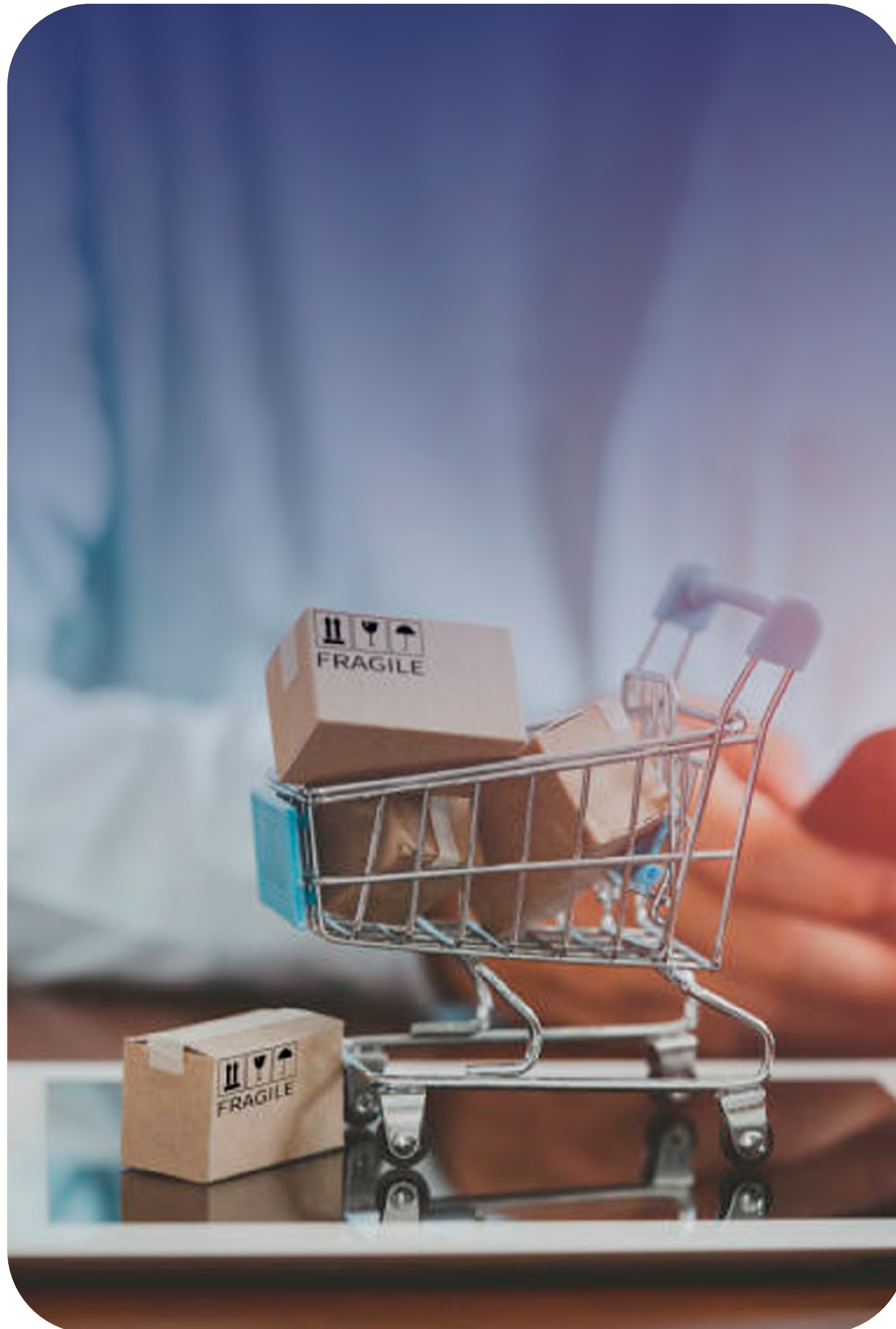
Efficient and transparent public procurement system

- ➔ **Joined the working group that developed a new Law on the Accounting Chamber, aimed at reforming Ukraine's main financial audit institution.** Some of our proposals were taken into account – in particular, those aimed at improving the competitive selection of members, strengthening the body's financial and political independence, and enhancing process efficiency.
- ➔ **Participated in the working group that finalized the draft of the new Law on Public Procurement.** In particular, we advocated for provisions requiring procuring entities to publish work acceptance certificates and to release files needed for cost estimates in the formats of [specialized budget programs](#). This Law is intended, among other things, to harmonize Ukraine's procurement rules with European standards.
- ➔ **The conclusions of our [Shadow Procurement Report](#) were reflected in the recommendations of the [European Commission's 2024 EU Enlargement Report](#).**
- ➔ **Our IT procurement study will contribute to the refinement of the Anti-Corruption Program.** The study we conducted for the Ministry of Digital Transformation demonstrated that Ukraine does not require a new IT procurement system, as initially envisaged by the SAP.
- ➔ **Based on the recommendations of our study, the government extended the deadline for submitting proposals for the procurement of works.** This decision made participation in tenders more appealing to businesses. In 2023, we [found](#) that the short deadline for submitting proposals in construction tenders negatively impacted competition. As a result, we recommended extending the submission period for procurement of works from 7 to 15 days.



Efficient and transparent public procurement system

c o r e
activities



- ➔ **Contributed to improving the new electronic form for appealing procurement transactions to the AMCU, making it easier for businesses to defend their rights.** Specifically, we participated in the development of the structure of the new electronic complaint form, which was launched in Prozorro in early 2024. It featured a complex architecture and contained several inconsistencies with existing legislation.
- ➔ **Together with KSE, we developed a Methodology for determining the value of procurements conducted outside the electronic system.** This document provides clear, step-by-step guidance to help procuring entities determine the optimal value of procured items.
- ➔ **Launched the Procuring Entity Index – a tool for evaluating the effectiveness of procurement transactions based on a set of indicators.** Procuring entities can use it to improve their processes.
- ➔ **The Temporary Investigative Commission of the Verkhovna Rada, established to investigate potential procurement violations, incorporated our recommendations into the conclusions of its report.** The recommendations related to the publication of cost estimates and acceptance certificates in construction tenders, rules for determining estimated values, the use of electronic contracts, and enhancements to procurement monitoring.



Transparent and accountable local government

core
activities



Presented the results
of a transparency study
involving **80** cities
under wartime conditions



Representatives of 67
city councils from 22
regions of Ukraine took
part in discussions on
the program's products

30+ cities
received guidance on
implementing trans-
parency and account-
ability practices



Transparent and accountable local government

core
activities

- ➔ **Developed and presented a [methodology](#) for ranking 80 cities based on the level of open data disclosure**, with the participation of representatives from the Ministry of Digital Transformation, city councils, and field experts.
- ➔ **Presented the updated methodology for the Transparency [Ranking](#) of 100 cities.** Revised the assessment areas and evaluation criteria, resumed public scoring, and expanded the number of cities included in the study.
- ➔ **Studied the following:** decolonization [processes](#) at the local government level; how cities use the [DREAM](#) digital ecosystem for accountable recovery management; which city heads [submitted reports](#) in 2023; the [openness](#) of city council and standing committee activities; the [functioning](#) of commissions handling compensation for damaged or destroyed property; and the state of participatory [budgeting](#) in Ukrainian cities following the full-scale invasion.
- ➔ **Facilitated the [participation](#) of 5 city council representatives in the Transparency School on Integrity.** In partnership with TI Lithuania, we selected representatives from the city councils of Berezne, Zhytomyr, Korosten, Lviv, and Mukachevo, and supported their participation in a study visit to Lithuania.



Effective state property management

core
activities



Following our study, the mechanism for the buyout of municipal property is planned to be abolished

Provided recommendations for enhancing the efficiency of municipal property privatization

Helped improve Prozorro.Sales



by updating filters for region, organizer, and industry, and by adding three new procedures



International sanctions and restoration of Ukraine

core
activities



Provided
a comprehensive analysis
of sanctions-related
confiscations



Advocated criminaliza-
tion of circumvention
of sanctions in Ukraine

Studied the outcomes
of the first year of
operation of the Fund
for the Elimination
of the Consequences
of Armed Aggression

Analyzed the first year
of implementation
of the Experimental
Restoration Project



International sanctions and restoration of Ukraine

- ➔ **Advocated for improved confiscation mechanisms and a stronger legal framework for the return of Russian assets to Ukraine.** TI Ukraine experts joined the working group on protecting third-party rights within the confiscation mechanism and submitted their proposals for the relevant draft law. We also prepared a [scientific justification](#) for optimizing Ukrainian and international law regarding the effective confiscation of Russian assets; the analysis was published in the Cambridge Journal of Law, Politics, and Art.
- ➔ **Conducted the first comprehensive analysis of the quality of sanctions mechanism implementation in Ukraine.** As part of [this study](#), we identified the key features of the newly introduced mechanism for confiscating sanctioned assets, outlined the main challenges associated with this approach, and analyzed the obstacles that must be addressed in the management and sale of confiscated property.
- ➔ **Continued to examine the processes of asset confiscation and recovery in criminal proceedings, drawing on both national experience and international practice.** In particular, we [investigated](#) how the confiscation of property from top corrupt officials is currently carried out in Ukraine and developed key recommendations for improving these procedures.
- ➔ **We studied 64 cases of (pro-)Russian asset confiscation and conducted a [comprehensive analysis](#) of 1,792 confiscated assets,** including 43 that have already been sold.
- ➔ **Civic oversight of public procurement saved more than UAH 2 billion,** with 97% of the savings allocated to restoration efforts.
- ➔ **Studied the outcomes of the first year of operation of the Fund for the Elimination of the Consequences of Armed Aggression.** Based on the results of [this analysis](#), we submitted our proposals to the Government for improving the distribution of funds from this fund.
- ➔ **[Analyzed](#) the first year of implementation of the pilot restoration project** financed by the Fund for the Elimination of the Consequences of Armed Aggression and provided recommendations to the government for improving this mechanism.



Strong and sustainable organization

core
activities



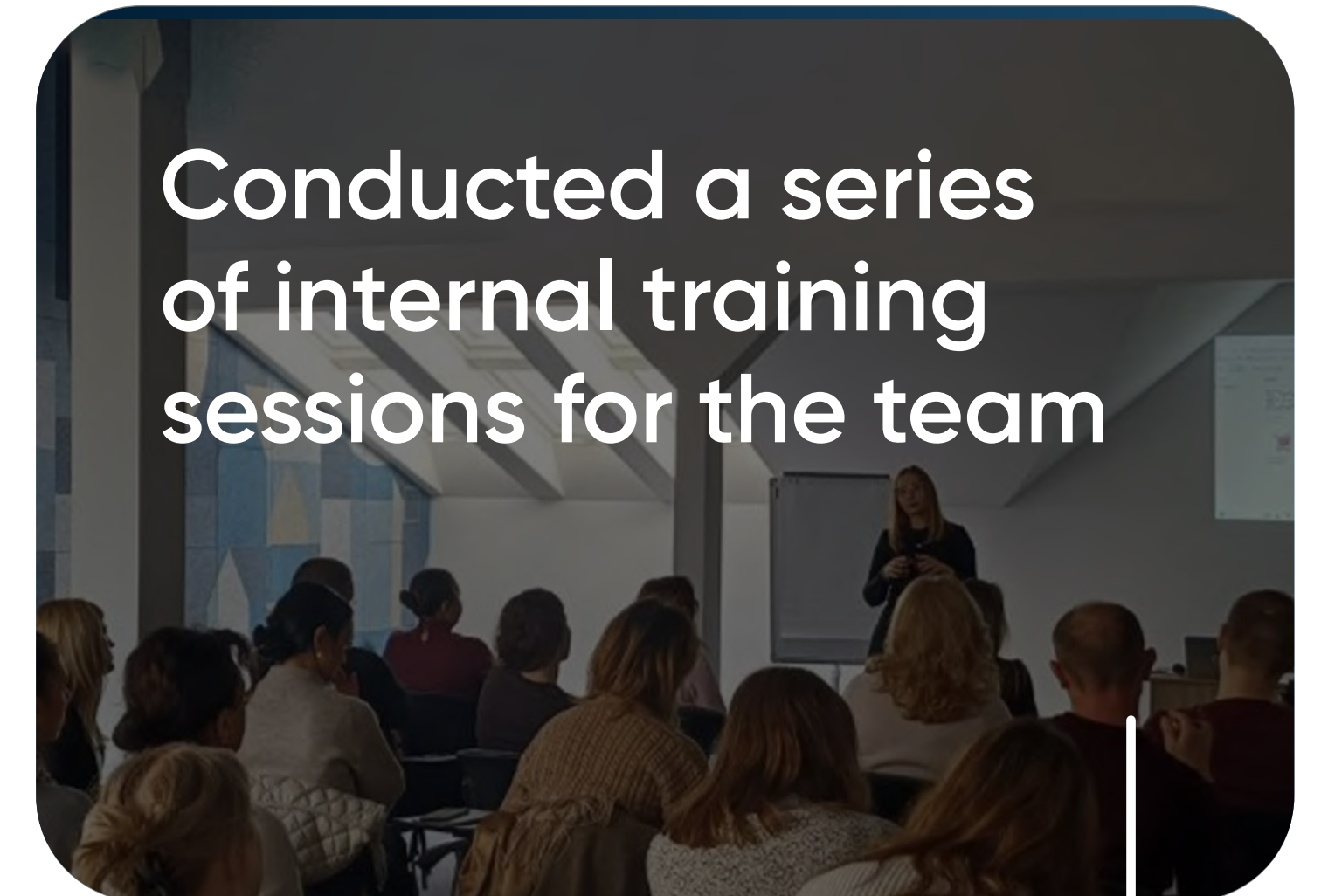
Developed and launched
the TI Ukraine Internship
Program



Enhanced
the organization's
analytical capacity

Continued
international advoca-
cy for the fight against
corruption in Ukraine

Conducted a series
of internal training
sessions for the team



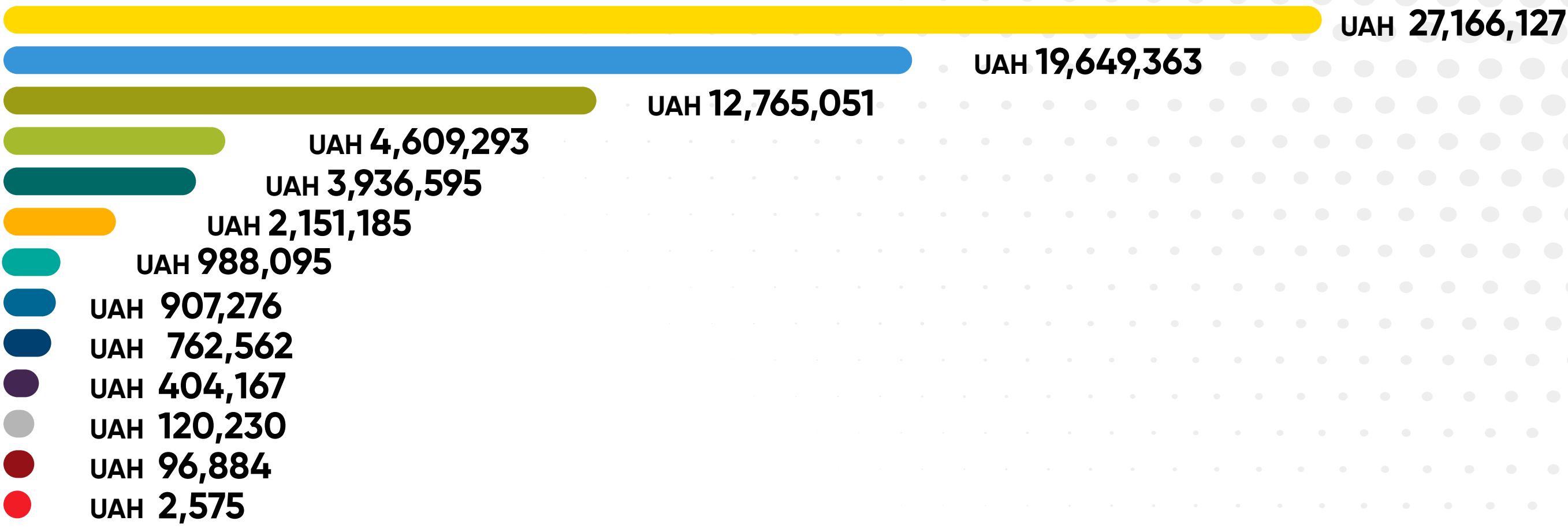
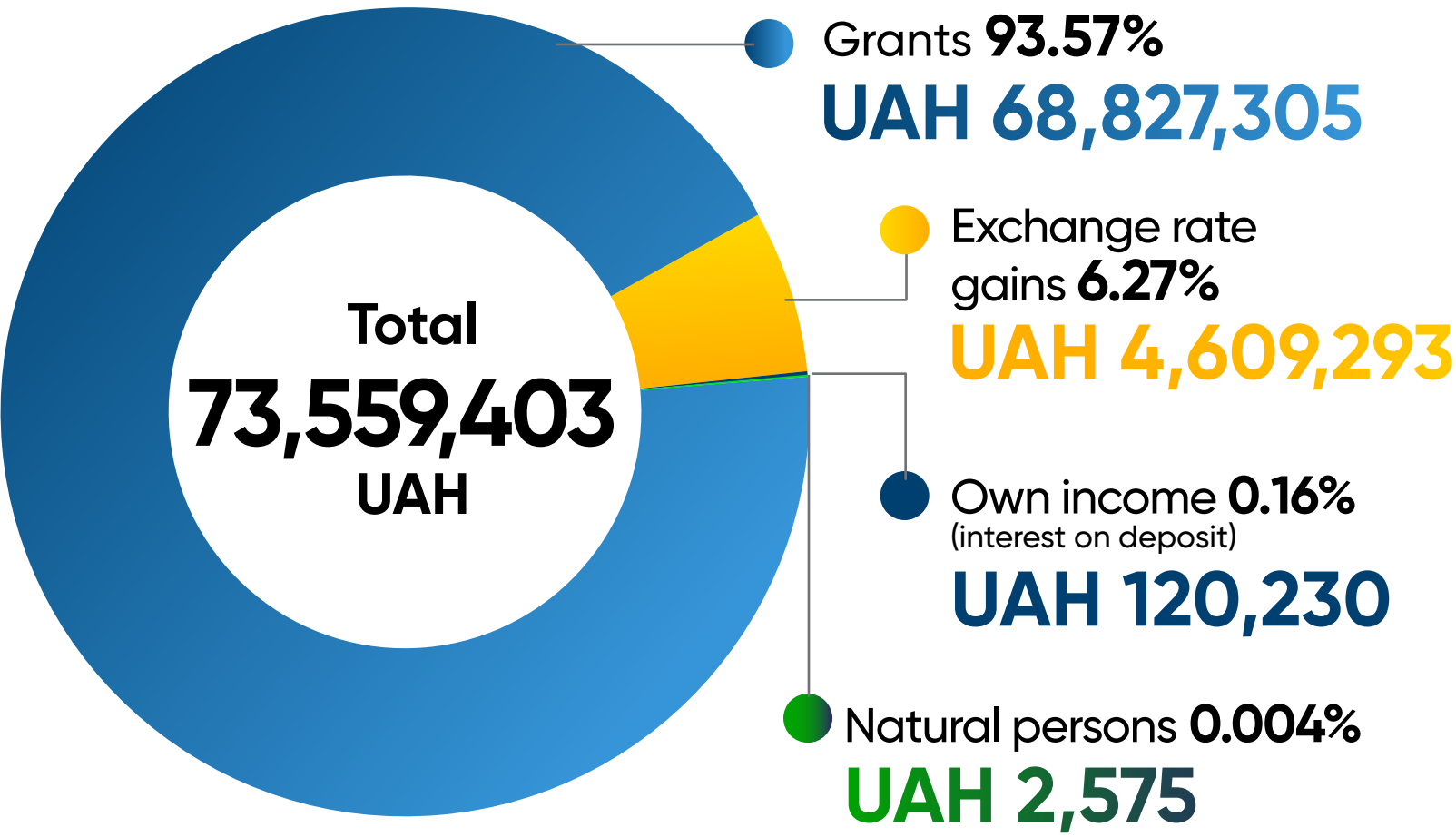
Strong and sustainable organization

core
activities

- ➔ **Developed and implemented the TI Ukraine Internship Program** Following the successful completion of the program, the organization offered jobs to two participants.
- ➔ **Continued international advocacy for the fight against corruption in Ukraine.** In 2024, representatives of the organization visited seven countries as part of 11 advocacy trips. In particular, our experts moderated panels at international events such as the International Anti-Corruption Conference (IACC) and the Ukraine Recovery Conference (URC 2024). TI Ukraine speakers also held 47 meetings with representatives from embassies and international partners.
- ➔ **Enhanced the organization's analytical capacity.** Throughout the year, our experts prepared 24 in-depth studies and 27 legal analyses on topics such as European integration processes, the work of anti-corruption bodies, the confiscation of Russian assets, city transparency practices, and the monitoring of public procurement.
- ➔ **Conducted a series of internal training sessions for the TI Ukraine team,** including courses on first aid, the development and strengthening of managerial competencies for middle and senior managers, and a certified program on European integration. Also, TI Ukraine employees received individual consultations with mental health specialists as part of the USAID/ENGAGE Mental Support for Partners program.



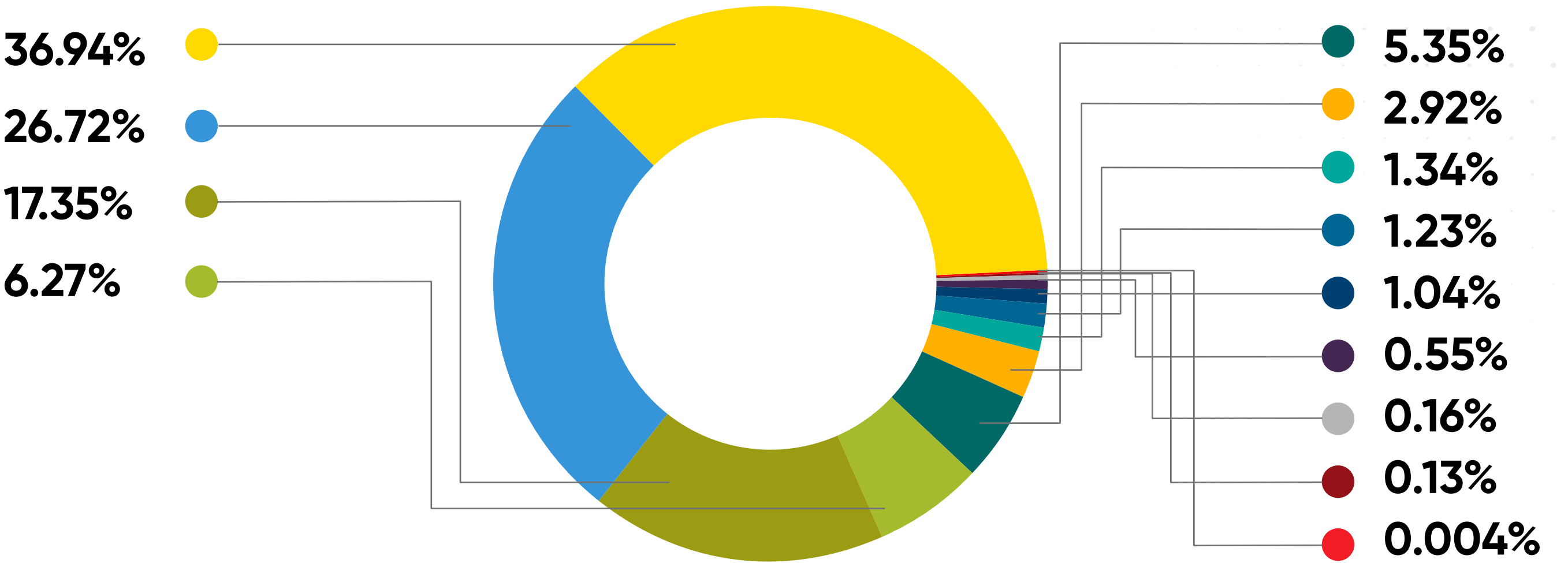
Financial report. Source



Income sources

- Swedish International Development Cooperation Agency (SIDA)
- The Eurasia Foundation
- Pact, Inc
- Exchange rate gains
- The International Renaissance Foundation
- European Commission
- Agency for Legislative Initiatives
- Ministry of Foreign Affairs of Denmark (EUACI)
- Institute of Analysis and Advocacy
- Basel Institute on Governance
- Own income (interest on deposit)
- Management Systems International (SACCI)
- Natural persons

Total expenses **UAH 73,559,403**



Financial report. Expenses

Project expenses

Total expenses
UAH 69,587,080

TI Ukraine's organizational development 22 374 283

<div></div> Pact, Inc	10 647 308
<div></div> Swedish International Development Cooperation Agency (SIDA)	10 225 095
<div></div> Ministry of Foreign Affairs of Denmark (EUACI)	970 872
<div></div> Transparency International e.V. (Secretariat)	531 008

Transparent and accountable reconstruction of Ukraine 15 295 850

<div></div> The Eurasia Foundation (TAPAS)	5 805 605
<div></div> European Commission	5 506 441
<div></div> BHP Foundation	3 983 804

Prozorro.Sale project 9 405 523

<div></div> Swedish International Development Cooperation Agency (SIDA)	9 405 523
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Civic oversight of public procurement 7 945 228

<div></div> The Eurasia Foundation (DTA)	7 945 228
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Launch of State Logistic Operator (DOT) 6 574 900

<div></div> Swedish International Development Cooperation Agency (SIDA)	6 574 900
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Building transparency in Ukrainian cities 4 673 113

<div></div> Pact, Inc	1 846 427
<div></div> The Eurasia Foundation (DTA)	1 664 287
<div></div> Swedish International Development Cooperation Agency (SIDA)	878 799
<div></div> Ministry of Foreign Affairs of Denmark (EUACI)	283 600

War-related response fund 1 238 141

<div></div> Own funds	1 238 141
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Policy-making in the field of security and defense 1 115 743

<div></div> The International Renaissance Foundation	1 115 743
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Civic monitoring of AC selection competitions 594 352

<div></div> Ministry of Foreign Affairs of Denmark (EUACI)	594 352
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Conference on security-civil society cooperation 203 000

<div></div> The International Renaissance Foundation	203 000
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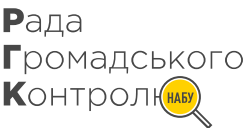
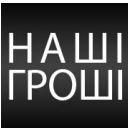
Other statutory activity 166 947

<div></div> Own funds	166 947
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Donors and partners



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**TRANSPARENCY
INTERNATIONAL**
UKRAINE

Transparency International Ukraine is an accredited chapter of the global movement Transparency International, helping Ukraine grow stronger since 2012. The organization takes a comprehensive approach to the development and implementation of changes for reduction of corruption levels in certain areas.

TI Ukraine helped create and subsequently transferred Prozorro, Prozorro.Sale, eHealth, and Prozvit systems to the state. The team also implemented City Transparency and Accountability Rankings, developed the DOZORRO community to control public procurement, and co-founded the RISE UA Coalition, which protects integrity and efficiency in the rebuilding process.