

# REPORT

## SECOND HALF 2024









NABU Director

**SEMEN KRYVONOS**

## **2024 WAS A YEAR OF CHANGE, CHALLENGES, AND ACHIEVEMENTS THAT OUTLINED NEW HORIZONS FOR NABU'S WORK.**

The transformation of organizational approaches, staff expansion, new work methods, and tackling internal crises laid the foundation for a confident transition into 2025.

Public demand for anti-corruption efforts is the key driving force behind our activities. Ukraine, fighting for its very existence, needs institutions capable of ensuring the inevitability of punishment for corruption crimes, even at the highest levels of power. This is NABU's mission and the challenge we face daily.

2024



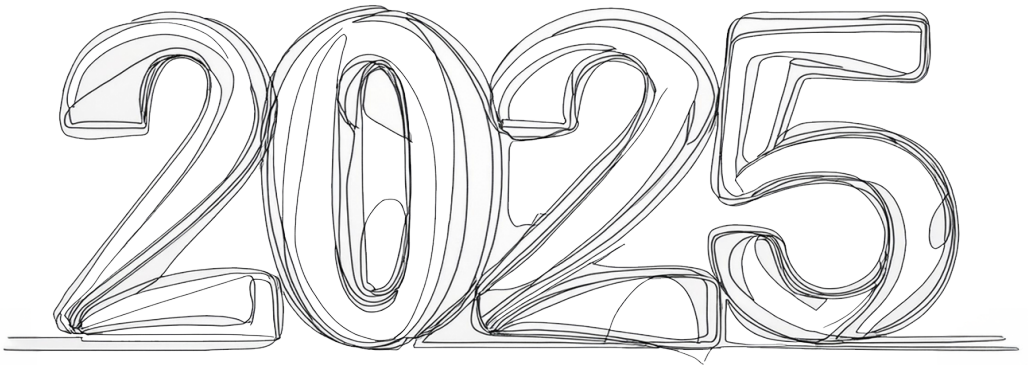
**Last year, NABU had significant results.** In 2024, we launched 658 new cases, including 95 in the defense sector, 37 in the energy sector, and 101 related to law enforcement and oversight bodies. Among the high-profile cases are investigations involving former members of parliament, ministers, customs, and tax officials linked to multimillion-dollar graft. The total identified losses exceeded UAH 26 billion. Thanks to our efforts, UAH 823 million was reimbursed to the state, and assets worth UAH 6.8 billion were seized.



**NABU focuses not only on high-profile cases but also on implementing new approaches to work.** Prioritizing key areas, exploiting the eCase system, digitizing processes, and developing the institution contribute to improving efficiency. Currently, the Bureau is undergoing large-scale staff expansion along with new performance evaluation protocols.

**Meanwhile, 2024 reminded us that growth is impossible without overcoming challenges.** The crisis that NABU faced strengthened the organization, highlighted the importance of open communication within the team, and reinforced institutional independence.

**In the fall of 2024, the first in NABU's 10-year history audit began.** It is a crucial step toward ensuring transparency and building trust in the country's anti-corruption institutions. We fully support this process, as transparency and efficiency in the fight against corruption are the foundation for building a strong, democratic state.



**In 2025, we will focus on several key areas: combating corruption in the defense sector, energy, customs, and the tax system.** A separate priority will be monitoring the country's reconstruction processes and enhancing regional operations. NABU works for society to ensure the inevitability of punishment for corruption crimes. We believe that consistent reforms and transparency in public administration will help reduce corruption risks. **Our ultimate goal is to create conditions where graft becomes a rare exception rather than a systemic problem.**

**WE THANK EVERYONE WHO SUPPORTS NABU AND SAPO. THERE IS MUCH WORK AHEAD, BUT WE ARE CONFIDENT THAT TOGETHER WE CAN MAKE UKRAINE STRONGER.**

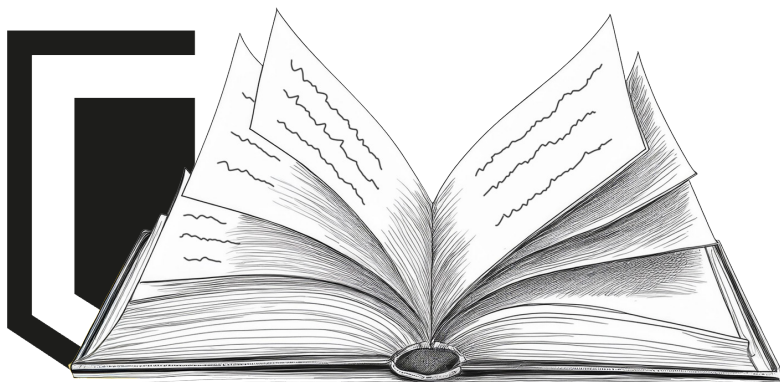


SAPO Head

**OLEKSANDR KLYMENKO**

## **THE SECOND HALF OF 2024 HAS BEEN A DEFINING PERIOD FOR SAPO, MARKED BY SIGNIFICANT PROGRESS AND STRUCTURAL REFORMS.**

This time was not only about tangible victories in the fight against corruption but also about deep institutional and legislative changes that have strengthened SAPO's role as an independent and effective body.



**One of the most notable achievements** was the adoption of key legislative amendments, particularly concerning plea agreements and corporate liability. These reforms have expanded the legal toolkit for investigating corruption cases. However, a critical legislative gap remains: the need to repeal the so-called Lozovyi amendments. Restoring the prosecutor's authority to extend pre-trial investigation deadlines and granting the Head of SAPO the independent power to initiate proceedings against members of parliament and establish joint investigative teams in cross-border cases are essential steps toward ensuring that those responsible for high-level corruption face justice.

**SAPO also set new records in 2024 for reclaiming illicit assets.** Over UAH 55 million in unjustified assets have been targeted through 12 legal claims submitted to the courts—each a crucial step in restoring fairness and reinforcing the principle that corruption does not pay.

**In addition, more than UAH 2.4 billion has been redirected toward Ukraine’s defense efforts.** These funds, recovered through bail forfeitures, fines from plea agreements, and other legal mechanisms, have directly supported the country’s resilience during wartime.

**Over the course of the year, SAPO prosecutors have notified 231 individuals of suspicion, including a sitting minister, members of parliament, the former Head of the State Migration Service, judges, senior officials of state institutions, and prosecutors from the Prosecutor General’s Office.** A record-breaking 113 indictments have been filed in court, targeting corruption schemes in customs operations, Ukrzaliznytsia, the energy sector, defense enterprises, and other industries critical to Ukraine’s stability.

**SAPO remains committed to strengthening its impact, ensuring that the fight against corruption is not just a slogan but a reality.** A system where accountability is inevitable is not only essential for Ukraine’s internal transformation but also a key requirement on its path to full EU membership. That is why implementing the EU’s recommendations on boosting institutional capacity in tackling grand corruption remains one of our top priorities.



I extend my gratitude to the dedicated teams at SAPO and NABU for their hard work, to the Ukrainian people and our international partners for their steadfast support in this common cause, and to the Armed Forces of Ukraine and volunteers who defend our sovereignty every day.

**OUR MISSION IS CLEAR: TO BUILD A UKRAINE WHERE CORRUPTION HAS NO Foothold, AND WE WILL NOT RELENT IN THIS EFFORT.**





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# 01

## **INVESTIGATION**



## **IN THE SECOND HALF OF 2024, NABU AND SAPO KEPT MOMENTUM IN EXPOSING HIGH-LEVEL CORRUPTION. THE FOCUS REMAINED ON CRIMES COMMITTED BY CURRENT MEMBERS OF PARLIAMENT AND OFFICIALS, WITH THE DEFENSE SECTOR, ENERGY, AND CUSTOMS BECOMING KEY AREAS OF CONCENTRATION FOR DETECTIVES AND PROSECUTORS.**

**During the reporting period, 65 individuals became suspects.** The most high-profile cases include a deputy minister of energy demanding half a million USD for a permit that in fact rescued valuable mining equipment from the frontline area; the first exposure of the head of a specialized court of general jurisdiction soliciting a USD 1 million bribe from a private company; road construction corruption within the Dnipropetrovsk Regional Military Administration; illegal enrichment of the Head of the Antimonopoly Committee of Ukraine; a bribery scheme within the Kharkiv Tax Service, involving three levels of intermediaries.

112 individuals faced trial. Among them are members of a criminal organization in Odesa, whose activities caused UAH 689 million in losses to the local community; participants in a scheme that embezzled nearly UAH 100 million during the procurement of radiation monitoring system equipment for NNEGC «Energoatom»; former ARMA executives accused of misappropriating USD 398,000 seized by the court and entrusted to the agency's management; a former Kyiv City Council deputy who requested USD 30,000 for the appointment of a market director; an MP accused of illegal enrichment by UAH 11 million.

**33 guilty verdicts in NABU and SAPO cases took effect.** Among the convicted are the former acting director of the state enterprise «Pivdendiproshakht» and his deputy, who attempted to embezzle UAH 7 million from the company; a former head of the Main Investigative Department of the Prosecutor General's Office, found guilty of fraud and aiding in bribery of a law enforcement official; a private company director who embezzled UAH 43.5 million from the state enterprise «Ukrkhimtransamiak.»

**Despite wartime challenges, a suspect in the Natskinemateka case was extradited from Poland to Ukraine.**

**In the second half of 2024, the total value of assets seized in NABU and SAPO cases exceeded UAH 5.2 billion.**

**Several foreign assets were seized.** These include luxury cars, real estate, and valuables belonging to suspects in the State Property Fund of Ukraine criminal organization case, as well as an ancient castle in Florence and other property owned by a businessman of Russian origin, involved in causing over USD 60 million in losses to PJSC «State Food and Grain Corporation of Ukraine.»



# HIGH-PROFILE CASES





## ILLEGAL ENRICHMENT

**Illegal enrichment of MP's and high-ranking officials undermines public trust in the government and reinforces the perception of officials seeking to amass wealth beyond their legitimate financial means.** The National Anti-Corruption Bureau of Ukraine and the Specialized Anti-Corruption Prosecutor's Office are taking efforts to eliminate this disgraceful phenomenon.

In August 2024, the head of the Antimonopoly Committee of Ukraine was served with a notice of suspicion of illegal enrichment. Investigators established that between 2020 and 2023, while serving as the head of a regional state administration, the suspect acquired 21 real estate properties and a luxury vehicle, registering these assets with his wife's relatives. The assets in question include seven apartments in Kyiv and Uzhhorod, a house near Kyiv with an area of over 220 square meters, two land plots, two garage units, six parking spaces, three commercial premises, and a BMW X3. The discrepancy between the total value of these assets and the combined income and savings of the official and his wife amounted to UAH 72.1 million. The crime was uncovered with the assistance of investigative journalists from Radio Svoboda.

**Another case involves the illegal enrichment of a member of the Ukrainian parliament.** Between 2021 and 2022, she acquired assets worth over UAH 20 million, which she later used to purchase a house in the Odesa region. However, her official income and savings for this period were no more than UAH 2.7 million.

Both suspects were also charged with misstatements, as the mentioned assets were not disclosed in their annual declarations.





## CORRUPTION AT KHARKIV TAX SERVICE

**This case is unique because, during the pre-trial investigation, detectives documented and exposed three levels of intermediaries.** Thanks to the plea agreement mechanism, NABU and SAPO brought the scheme's curator to justice. In the winter of 2024, the head of a unit at the Main Department of the State Tax Service in Kharkiv region encouraged a representative of a private company to pay USD 55,000 to the executives of the Main Department, including its acting head. The bribe was meant to remove the company from the list of taxpayers classified as high-risk. Its transfer was facilitated through two intermediaries: a subordinate of the unit head and a Kharkiv-based entrepreneur. The unit head was served with a notice of suspicion in February 2024. Thanks to the meticulous efforts of detectives and prosecutors, sufficient evidence was gathered to charge the intermediaries as well. The investigation of these persons resulted in guilty verdicts.

In May 2024, the head of the division was officially charged, and in July 2024, the scheme's curator—the Main Department's head—was also served with a notice of suspicion.

In December 2024, the investigation in the case was completed.







## CORRUPTION AT CUSTOMS

**Corruption in customs poses a major threat to the country's economy, as such crimes lead to billions of hryvnias in state budget losses.** From attempts to install “the right people” in key positions to large-scale corruption schemes, each case represents a danger that NABU and SAPO work to identify and dismantle.

**The second half of 2024 began with the exposure of deep-rooted corruption at the Rivne Customs Office.** A department head, in collusion with other officials from the State Customs Service of Ukraine, orchestrated a scheme to receive bribes for “assisting” companies in clearing customs without obstacles. Using his position, he ensured the clearance of goods at significantly reduced tariffs. **One of the most high-profile cases involved an attempt by a group of individuals to place “their people” in leadership positions at regional customs offices.** They offered USD 1 million for the position of head of Lviv Customs, USD 500,000 for Volyn Customs, and USD 200,000 for Chernivtsi Customs. The group expected that in return, the leadership of the State Customs Service would “overlook” corruption schemes at the named customs offices in exchange for half of the illicit proceeds.

**At Volyn Customs, two officials were caught facilitating the illegal movement of Apple products through the international checkpoint “Yahodyn” without proper customs payments, causing over UAH 53 million in state losses.** Detectives documented eight instances of deliberate inaction on illegal goods movement, document falsification, and the entry of false data into the customs clearance system.

**A scheme to illegally import electronics through Lviv Customs was uncovered in cooperation with the Security Service of Ukraine in the Lviv region.** The goods crossed the border under forged documents without any customs duties being paid. Following the scheme's exposure, the goods were seized, transferred to the Asset Recovery and Management Agency, and sold, fully compensating for the inflicted losses.



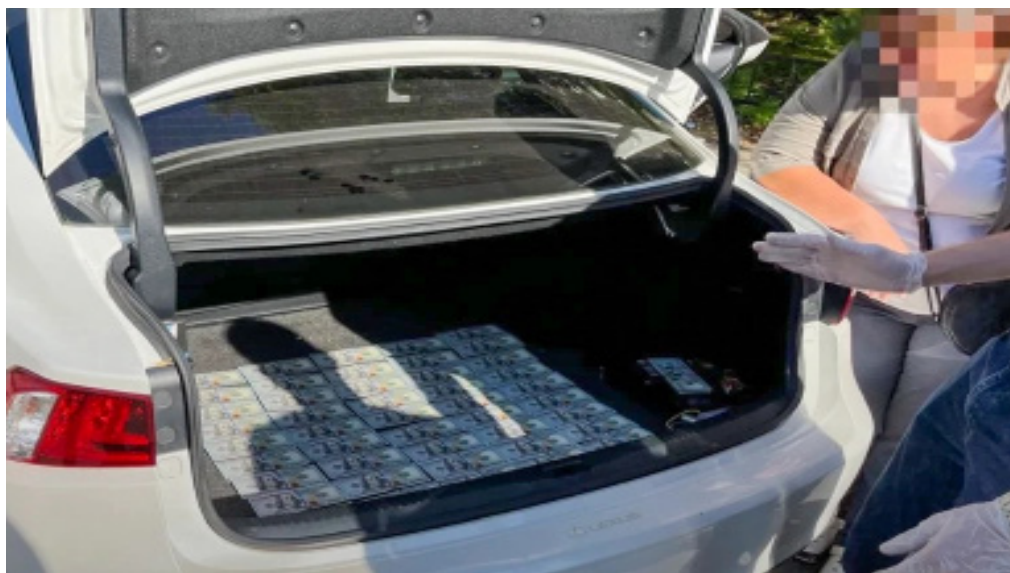


## CORRUPTION IN ENERGY SECTOR

**NABU and SAPO continue fighting corruption in the energy sector.** One of the most audacious and cynical cases in the history of anti-corruption agencies was the exposure of the Deputy Minister of Energy, who was caught demanding a USD 500,000 bribe. The high-ranking official, in collusion with the heads of two state-owned coal enterprises from the East and two other persons extorted this sum from the head of another coal company in the western region for facilitating the transfer of mining equipment from frontline mines to his enterprise. Essentially, the scheme involved profiting from efforts to save valuable equipment. **Another case involves coal supply scheme that resulted in nearly UAH 12 million in losses for a state-owned energy producer.** The persons behind the fraud were a former deputy minister of energy, a former MP, the beneficiary of a private company, and the director of the state enterprise «Ukrvuhillia.»

**Equally egregious was the embezzlement of state funds during the procurement of transformer equipment for JSC «Kharkivoblenergo.»** Members of an organized group inflated the cost of the energy equipment by UAH 132.5 million, with some components priced five times higher than their actual value. However, they managed to misappropriate only UAH 12.5 million before external circumstances, including the imposition of martial law, forced them to halt. Following procedural actions by NABU detectives at «Kharkivoblenergo,» the perpetrators ultimately abandoned their criminal plans. Seven persons became suspects in the case.





## CORRUPTION AT PROSECUTOR'S OFFICE

Prosecutors, who are entrusted with defending the state's interests, sometimes find themselves on the wrong side of the law. This half-year, at least two of them were not only prosecuting cases in court but also enriching themselves illegally.

**In the summer, NABU and SAPO charged a prosecutor of the Prosecutor General's Office with inciting a USD 170,000 bribe for closing a criminal case.** The crime was uncovered with the involvement of undercover detectives.

**Another case involves the deputy head of the Zaporizhzhia Regional Prosecutor's Office, who was caught in September receiving USD 40,000.** The money was demanded for changing the jurisdiction of a criminal case, lifting the seizure of property, and ensuring that an individual would not be held accountable.

As of the end of the reporting period, both cases remained at the pre-trial investigation stage.





## JUDICIARY CORRUPTION

**In the second half of 2024, anti-corruption authorities exposed the head of a specialized court of general jurisdiction for the first time.** The case involves both the sitting and former chairmen of the Commercial Court of the Lviv Region, who extorted USD 1 million from a representative of a private company. In exchange, they promised to ensure that the necessary rulings were made by the Western Commercial Court of Appeal. Additionally, they pledged to prevent the murder of a whistleblower, which was allegedly planned by his opponents in a legal dispute. During the investigation, detectives and prosecutors documented the transfer of a part of the undue advantage in the amount of USD 75,000.

### **NABU and SAPO expanded the list of suspects in a case involving the illegal departure of conscription-age men from the country to evade mobilization.**

A judge from a district court in the Odesa region assisted in this scheme by issuing fraudulent court rulings. These rulings falsely stated that a child's place of residence was with the father, which allowed men to use this as a legal basis to leave Ukraine. The cost of such «services» ranged from USD 1,500 to USD 3,500. Between 2022 and 2023, the court issued over 1,000 such rulings. The judge was exposed in January 2024, and on July 30, charges were filed against five of his accomplices.





## CORRUPTION IN DEFENSE SECTOR

Alongside the heroic efforts of Ukraine's defenders, some officials exploit the country's critical needs for personal enrichment. In the second half of 2024, NABU and SAPO uncovered several corruption crimes in the defense sector.

**Officials from two structural units of the Armed Forces of Ukraine's Logistics Forces ensured that pre-selected companies won tenders for aviation components.** More competitive commercial offers were deliberately distorted or ignored altogether. As a result, contracts were signed under unfavorable conditions, leading to an overpayment of UAH 27.3 million.

**Another case involved the embezzlement of UAH 12 million during the procurement of dynamic protection elements for armored vehicles.** Scheme participants, including the head of a state enterprise and the chief accountant, artificially inflated costs. Despite having the necessary components in stock, they falsified documents to show a fake purchase from a commercial entity, which justified the illegal transfer of state funds. As a result, UAH 12 million in losses were incurred, with the money funneled into controlled accounts for further laundering.

**NABU and SAPO also uncovered an accomplice in a case involving the procurement of overpriced personal protective equipment during Russia's full-scale aggression.** The head of the Security Department at PJSC «NEC Ukrenergo» facilitated the purchase of body armor from a company that lacked proper licenses and sold the vests at double the market price. This scheme caused over UAH 10.3 million in damages to the state. The accomplice coordinated with representatives of the energy company and other institutions and was directly involved in the distribution of vests.



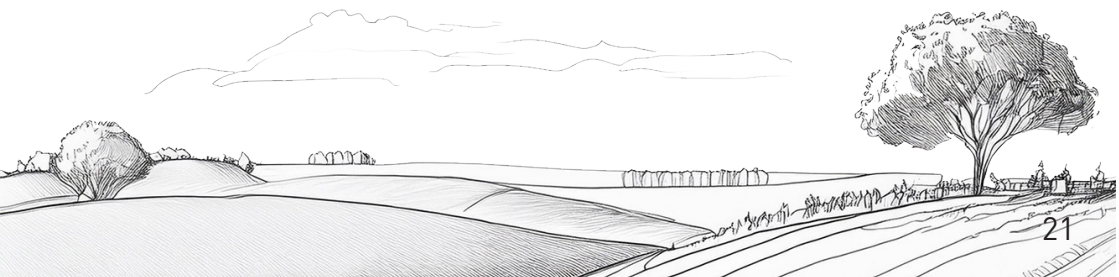


## LAND SCHEMES

Land corruption remains a serious issue for Ukraine, particularly when officials abuse their positions for personal gain. NABU and SAPO continue exposing schemes involving the illegal appropriation of land resources.

**In the second half of 2024, the former acting head of the Main Directorate of the StateGeoCadastre in the Zhytomyr region was notified of suspicion.** In 2021, he illegally terminated the permanent rights of an agricultural enterprise to nearly 5,000 hectares of land. Despite numerous court decisions in favor of the company, the official canceled the registration of state assets and tried to transfer the land to another legal entity. As a result, the enterprise suffered losses exceeding UAH 54 million. The investigation into the scheme was completed in October 2024.

**Another case of land corruption was uncovered in the Dnipropetrovsk region. In early 2024, a private company sought to lease a 19-hectare forest plot for recreational purposes.** After several rejections, a company's representative was approached by a deputy head of the regional state administration, offering to facilitate the long-term lease approval in exchange for a USD 200,000 bribe. He was notified of suspicion under Part 4, Article 368 of the Criminal Code of Ukraine.





## FRONTLINE INFRASTRUCTURE

Despite Russia's full-scale aggression and the presence of enemy forces on Ukraine's borders, some officials continue engaging in corrupt activities.

**In the second half of 2024, NABU and SAPO exposed an MP of IX convocation and his accomplice—a former acting deputy head of the Criminal Investigation Department of the National Police and ex-head of the Strategic Investigations Unit in Sumy region—for soliciting an undue benefit.**

In March 2024, the MP approached the head of a village council in the Sumy region, demanding a kickback in exchange for not interfering with a tender for the repair of a water supply system in the Okhtyrka district. The bribe amounted to 10 percent of the contract value, with an additional 4 percent earmarked for local law enforcement officers to ensure they would not obstruct the allocation of funds. According to the investigation, the total kickback reached UAH 3.4 million.





## ROAD CONSTRUCTION CORRUPTION

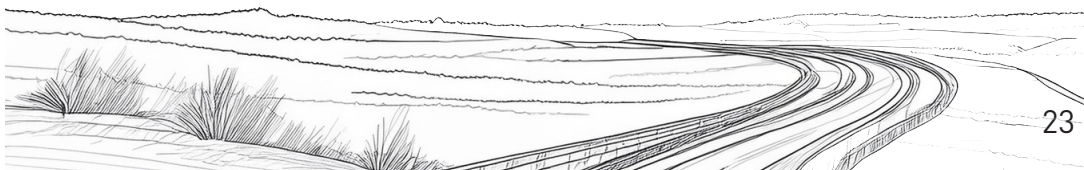
The «Great Construction» program has been one of the government's flagship projects, with billions of hryvnias allocated for roads. However, the ambitious initiative did not escape controversy and became the focus of a major corruption scandal.

**In September 2024, NABU and SAPO exposed a large-scale corruption scheme in road construction within the Dnipropetrovsk Regional State Administration.** The former head of the Dnipropetrovsk RSA, his deputy, the head of the department, the head of the road infrastructure division, and the director of a business entity were all notified of suspicion.

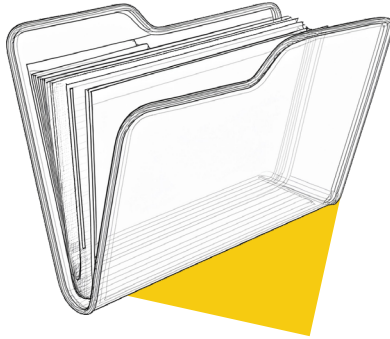
In 2022, wartime legislation prioritized funding for road maintenance, while expenditures on current and capital road repairs were allowed only as a last resort. The suspects falsified documentation, replacing references to current and capital repairs with urgent operational maintenance, thus securing priority funding.

The cost of this maintenance was artificially inflated to UAH 1.5 billion. Contracts were then awarded to a company affiliated with the head of the Dnipropetrovsk RSA, which overpriced materials by more than UAH 286 million.

Currently, five individuals are under suspicion, the investigation is ongoing.



# PRETRIAL INVESTIGATION (AS OF 31.12.2024)



**392 SUSPECTS**

**627 INDICTMENTS**

**1275 ACCUSED**

## PRETRIAL INVESTIGATION IN THE SECOND HALF OF 2024

**346 NEW INVESTIGATIONS**

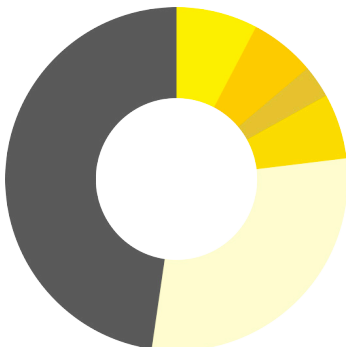
**65 SUSPECTS**



**49 INDICTMENTS**

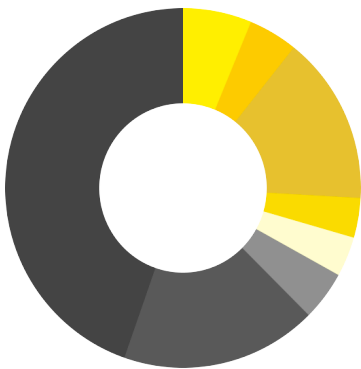
**112 ACCUSED**

## EXPOSED IN THE SECOND HALF OF 2024:



- 5** - senior state officials
- 4** - heads of state-owned enterprises with 50%+ of shares owned by the state
- 2** - judges
- 4** - prosecutors
- 19** - civil servants, law enforcement officers, local government officials who have committed corruption crimes, which caused damage to the interests of the state in excess of 500 subsistence minimums established for able-bodied persons
- 31** - other persons, lawyers

## FACED TRIAL IN THE SECOND HALF OF 2024:

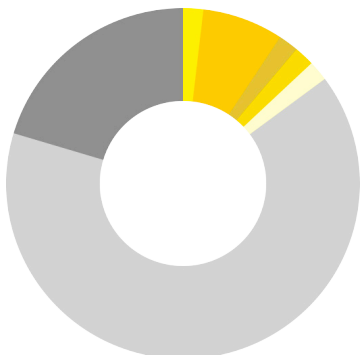


- **7** - senior state officials
- **5** - «A» category civil servants, officials of the local government falling within the first and second category
- **17** - heads of state-owned enterprises with 50%+ of shares owned by the state
- **4** - judges
- **4** - prosecutors
- **5** - deputies of regional councils
- **20** - civil servants, law enforcement officers, local government officials who have committed corruption crimes, which caused damage to the interests of the state in excess of 500 subsistence minimums established for able-bodied persons
- **50** - other persons, lawyers



## CONVICTED OF CORRUPTION\* IN THE SECOND HALF OF 2024:

\*sentences took effect



- **1** - senior state official
- **4** - heads of state-owned enterprises
- **1** - judge
- **1** - prosecutor
- **1** - deputy of regional councils
- **11** - civil servants, law enforcement officers, local government officials who have committed corruption crimes, which caused damage to the interests of the state in excess of 500 subsistence minimums established for able-bodied persons
- **35** - other persons, lawyers



# NABU, SAPO'S ECONOMIC EFFECT IN 2024



## **NABU, SAPO'S ECONOMIC EFFECT IN 2024 MAKES UAH 4.5 BILLION, UAH 739+ MILLION IN H2**

**In the second half of 2024, the economic effect of NABU and SAPO work exceeds UAH 739 million, while the year total makes UAH 4.5 billion.**

**From July to December 2024, UAH 98.3 million was allocated to strengthen the country's defense.** These funds were either seized or paid under plea agreements in criminal cases investigated by NABU and SAPO. The amount also includes money posted as bail and withdrawn by decisions of the High Anti-Corruption Court. The total volume of assets transferred for military needs since 2022 exceeds UAH 2.56 billion. **In the reporting period, the amount of compensation in NABU and SAPO cases makes UAH 614.06 million.** Over UAH 222 million was returned to the account of the state-owned PrivatBank as part of a criminal investigation into the unlawful misappropriation of the bank's funds. UAH 157.4 million was reimbursed by private companies to PJSC "Zaporizhiaoblenergo," PJSC "Cherkasyoblenergo" in pursuance of 11 court decisions to invalidate agreements on assignment of claims and debt transfer, adopted as a result of NABU motions. Additionally, United Energy LLC returned UAH 44.6 million to the accounts of NEC "Ukrenergo." Overall, thanks to NABU and SAPO, some UAH 10 billion had been returned to the state as of December 31, 2024.

**During the second half of 2024, several guilty verdicts came into legal force, resulting in the confiscation of assets worth over UAH 26.8 million.** This includes both cash and property such as land, apartments, houses, and vehicles.

# REIMBURSEMENT IN CRIMINAL PROCEEDINGS

(Both under investigation and sent to court)



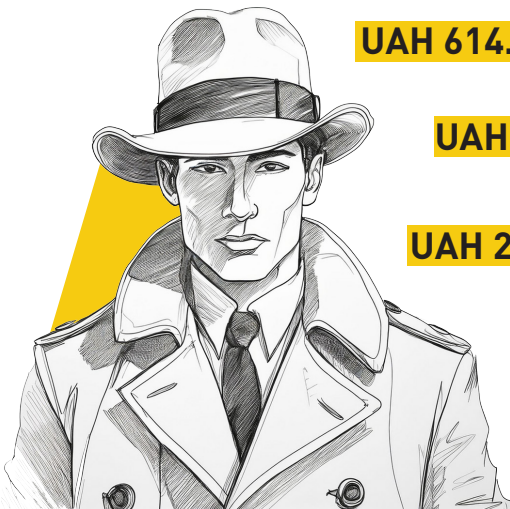
**UAH 10 BILLION** as of 31.12.2024

**UAH 614.06 MILLION** in the second half of 2024

**UAH 2.56 BILLION** funds sent to army needs by court order as of 31.12.2024

**UAH 98.3 MILLION** in the second half of 2024

# ECONOMIC EFFECT OF NABU AND SAPO WORK IN THE SECOND HALF OF 2024



**UAH 614.06 MILLION** reimbursed to the state

**UAH 98.3 MILLION** directed to army needs

**UAH 26.8+ MILLION** confiscated into state revenue

**UAH 739+ MILLION** in the second half of 2024

**UAH 4.5 BILLION** in 2024

# 02

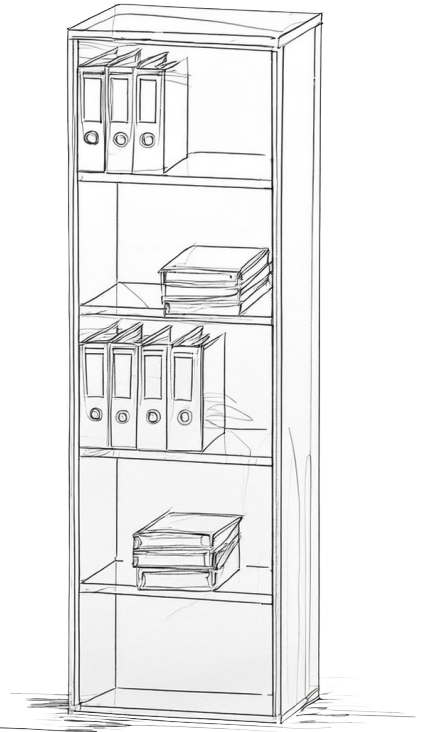
## **INTERACTION**



# 2024 MARKED AN IMPORTANT MILESTONE FOR NABU

The second half of the year was characterized by reforms, the expansion of international cooperation, the strengthening of digital tools in investigations, and active engagement with the youth.

Our goal remains unchanged—achieving justice and combating corruption. We are proving that no one is untouchable and continue to strengthen ourselves both institutionally and technologically.



## International cooperation

**Cooperation with international partners remained one of the main priorities for NABU in 2024.** Special attention was given to interaction with governments and law enforcement authorities of partner countries. Notably, important meetings were held with representatives from the United States, Japan, Italy, and international organizations, including a delegation from the International Monetary Fund. NABU continues to maintain a high level of trust from international partners, which contributes to the continued funding of critical anti-corruption initiatives.

**In addition, the signing of memorandums of cooperation with the anti-corruption bodies of Italy and Japan facilitated the exchange of experience and best practices in detecting and combating corruption.** These arrangements also include active information sharing, which improves the effectiveness of joint investigations.

2024 was an important stage in Ukraine's path toward integration into European and international structures. One of the key aspects is the importance of Ukraine's accession to the OECD Anti-Bribery Convention, particularly in terms of adopting a legislation to introduce criminal liability for legal entities providing undue advantage. The development and adoption of such laws are crucial steps for strengthening the European integration process and achieving the highest global standards in the fight against corruption.



## **Digitalization at NABU: innovations in anti-corruption activities**

**Digitalization continues to play a key role in NABU's work. In line with the development plan, significant progress was made in 2024 in implementing innovative technologies to enhance the effectiveness of anti-corruption investigations.**

The National Bureau continues to cooperate with other bodies and institutions to improve the eCase system, including in cooperation with the scientific community. This direction is crucial for developing the system seeking to enhance the approaches used by NABU detectives in their work. The eCase system is designed to streamline and improve the work of NABU detectives, saving time and resources while creating a completely new future for criminal justice. The system is already showing its results. As of December 31, 2024, over 1600 e-motions had been submitted and registered with the court.

**Working with youth: building anti-corruption culture among future lawyers**

**Training young professionals and instilling zero tolerance for corruption have become crucial aspects of NABU's work in 2024.** As part of the 10th anniversary of the adoption of the Law «On the National Anti-Corruption Bureau of Ukraine,» Director Semen Kryvonos held a meeting with students of Taras Shevchenko National University of Kyiv. He emphasized the importance of raising awareness among young people about the role of anti-corruption bodies in ensuring justice in the country.

**The second half of the year was traditionally rich in major NABU anti-corruption projects:** the fifth NABU Anti-Corruption School and the fourth All-Ukrainian Anti-Corruption Moot Court were held. Together, these projects gathered more than 1,500 engaged students who will actively contribute to NABU's work as graduates and young lawyers. NABU actively cooperates with universities and other educational institutions by conducting lectures, seminars, and practical training. This initiative allows future lawyers to familiarize themselves with real anti-corruption cases and develop skills to combat corruption at the state level. As a result, NABU has established itself in the labor market among young lawyers, and more young people are applying for positions in the National Bureau through competitive selection.

**Independent audit and strengthening National Bureau**

An independent audit of NABU's activities is an essential part of ensuring transparency and efficiency within the Bureau. In the second half of 2024, an external independent evaluation of NABU's work was launched, conducted by international experts. The audit aims to enhance public and international partners' trust in NABU's activities and improve internal processes. The audit commission consists of experts in security, anti-corruption, asset recovery, and auditing, appointed by the Cabinet of Ministers of Ukraine based on recommendations from international organizations providing technical assistance in the fight against corruption.

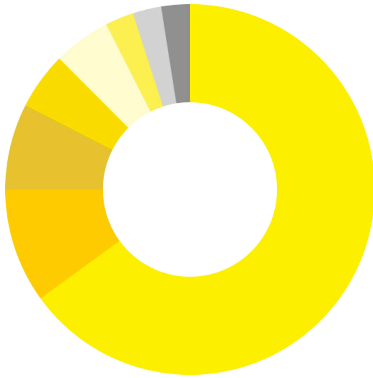
An external independent audit of NABU's activities is mandated by the Law of Ukraine «On the National Anti-Corruption Bureau of Ukraine» and is a crucial step in securing international financial support for Ukraine and achieving its European integration goals.

# COOPERATION WITH GOVERNMENT AGENCIES

(from 01.07.2024 until 31.12.2024)

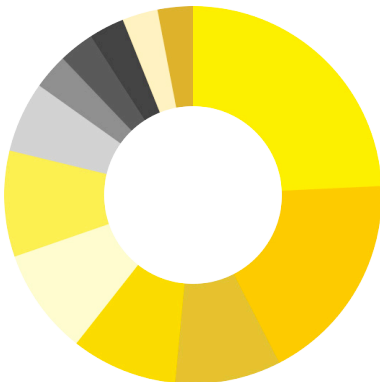
## NABU LAWYERS ANALYZED AND PROVIDED CONCLUSIONS REGARDING:

### 43 DRAFT LAWS



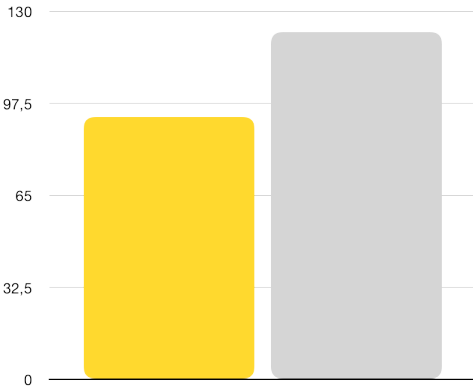
- 26** - Verkhovna Rada of Ukraine
- 4** - National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes
- 3** - Ministry of Justice of Ukraine
- 2** - National Agency for Corruption Prevention
- 2** - Ministry of Veterans Affairs of Ukraine
- 1** - Ministry of Strategic Industries of Ukraine
- 1** - Ministry of Internal Affairs of Ukraine
- 1** - National Security and Defense Council of Ukraine

### 33 DRAFTS OF SUBORDINATE ACT



- 8** - Ministry of Internal Affairs of Ukraine
- 6** - Ministry of Economy of Ukraine
- 3** - Ministry of Justice of Ukraine
- 3** - Ministry of Veterans Affairs of Ukraine
- 3** - Ministry of Health of Ukraine
- 3** - Ministry of Foreign Affairs of Ukraine
- 2** - Ministry of Digital Transformation of Ukraine
- 1** - Ministry of Social Policy of Ukraine
- 1** - Ministry of Defence of Ukraine
- 1** - State Service of Ukraine for Geodesy, Cartography and Cadastre
- 1** - The State Emergency Service of Ukraine
- 1** - National Police of Ukraine

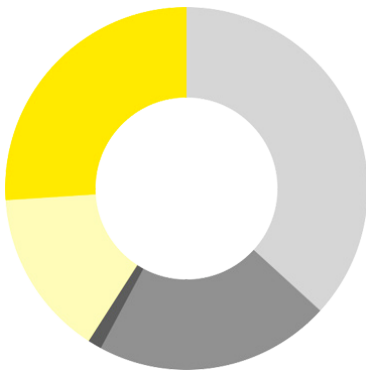
## INTERNATIONAL LEGAL ASSISTANCE



**UAH 92.6 MLN** the second half of 2024

**UAH 122.7 MLN** overall in 2024

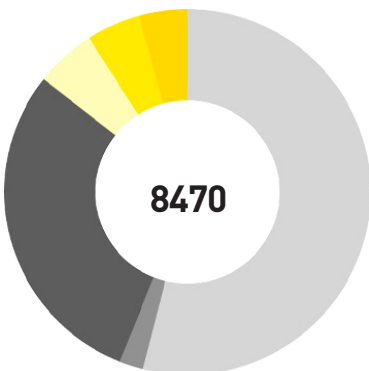
## COMMUNICATION WITH THE PUBLIC



- 89 - responses to media requests
- 51 - comments to media on NABU's work
- 3 - interviews for the national media
- 36 - briefings and press conferences (incl. online)
- 63 - awareness raising events (incl. online)

**8439 - number of attendees**

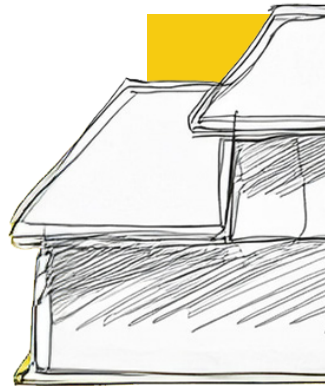
## REQUESTS TO THE NATIONAL BUREAU (from 01.07.2024 until 31.12.2024)

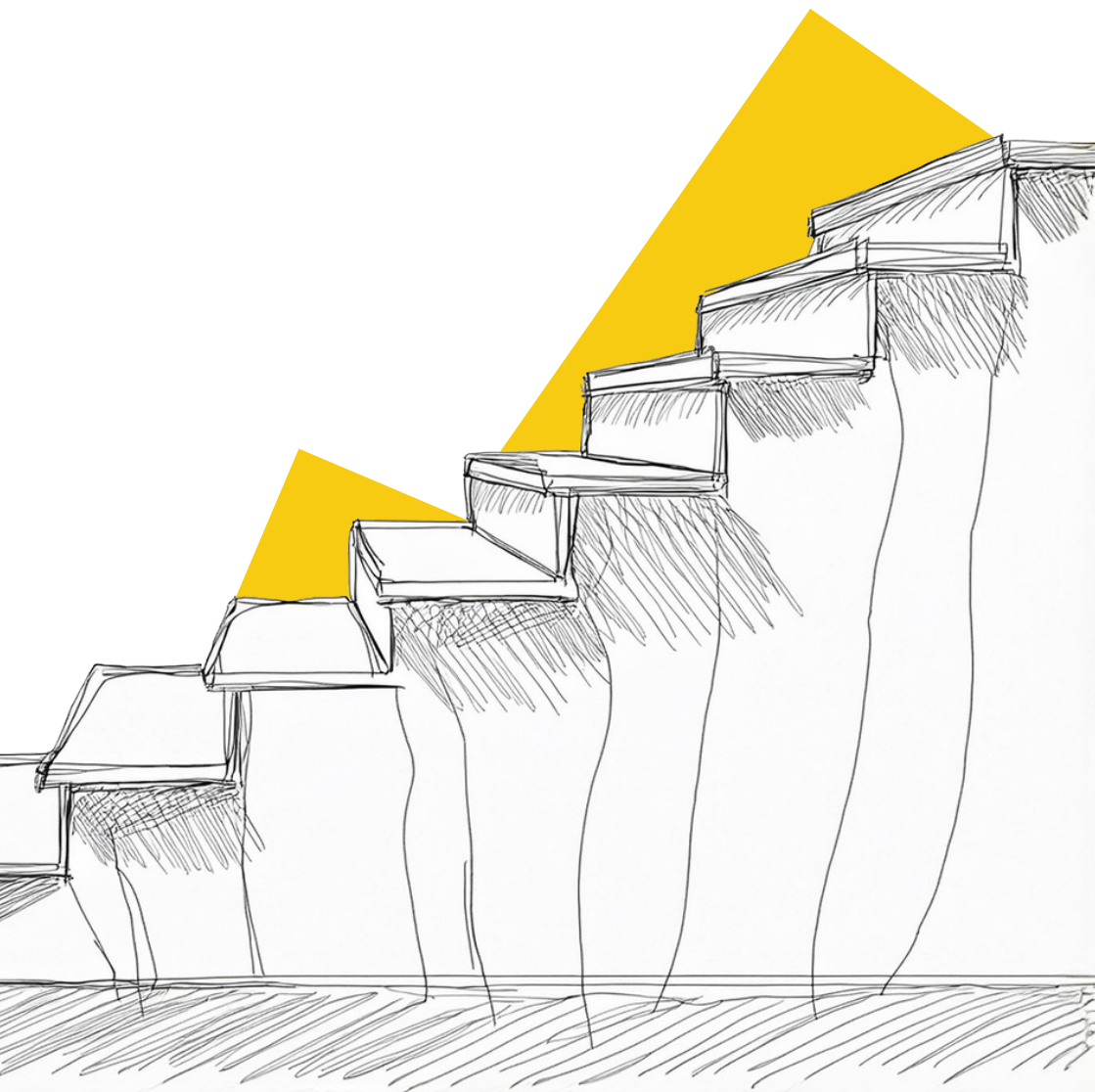


- 5334 - by mail/email
- 209 - via the public office
- 2927 - via the call center
- 529 - from legal entities and authorities
- 473 - from NGOs
- 421 - public information requests

# 03

## CHALLENGES







## IN 2025, NABU REMAINS FOCUSED ON PRIORITY AREAS IN THE FIGHT AGAINST CORRUPTION, PARTICULARLY IN THE DEFENSE, ENERGY, TAX, AND CUSTOMS SECTORS, AS WELL AS IN THE COUNTRY'S RECONSTRUCTION PROCESSES



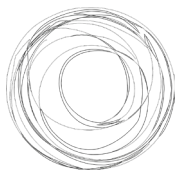
**In the fall of 2024, an audit of NABU's activities began, serving as an important tool for assessing the Bureau's efficiency.** It enhances transparency, identifies potential shortcomings, and strengthens public and international partners' trust in Ukraine's anti-corruption infrastructure. NABU fully contributes to this process, as it remains committed to improving its work for greater efficiency in fulfilling its mandate.

**Despite its significant achievements and results, NABU faces a several challenges that require comprehensive solutions.** Key priorities include establishing an independent forensic institution to conduct examinations in cases investigated by NABU and SAPO, implementing the agency's right to independent wiretapping and improving legislation, particularly by closing loopholes in the so-called 'Lozovyi amendments.'



## **Establishment of an independent forensic institution**

The absence of an independent forensic institution remains one of the major challenges. The current forensic system poses risks of information leaks, delays and potential interference. Operating such an institution within NABU would ensure independence and efficiency in conducting examinations — critical to documenting crimes and forming a solid evidence base.



## **Autonomous wiretapping**

Another challenge concerns NABU's right to independently conduct covert investigative actions, particularly wiretapping. The lack of this feature limits the Bureau's ability to swiftly respond to corruption offenses and prevent them in real-time. Securing independence in this area is crucial for strengthening the anti-corruption framework. NABU continues to cooperate with the Security Service of Ukraine to tackle this issue.



## **Legislative improvements**

The third significant obstacle is legislative shortcomings, in particular the so-called "Lozovyi amendments" which impose strict deadlines on investigations and introduce additional procedural hurdles. These limitations create opportunities for delaying cases and complicate efforts to hold high-ranking officials accountable for corruption. Addressing this issue depends on Parliament, which must introduce the necessary legislative changes.



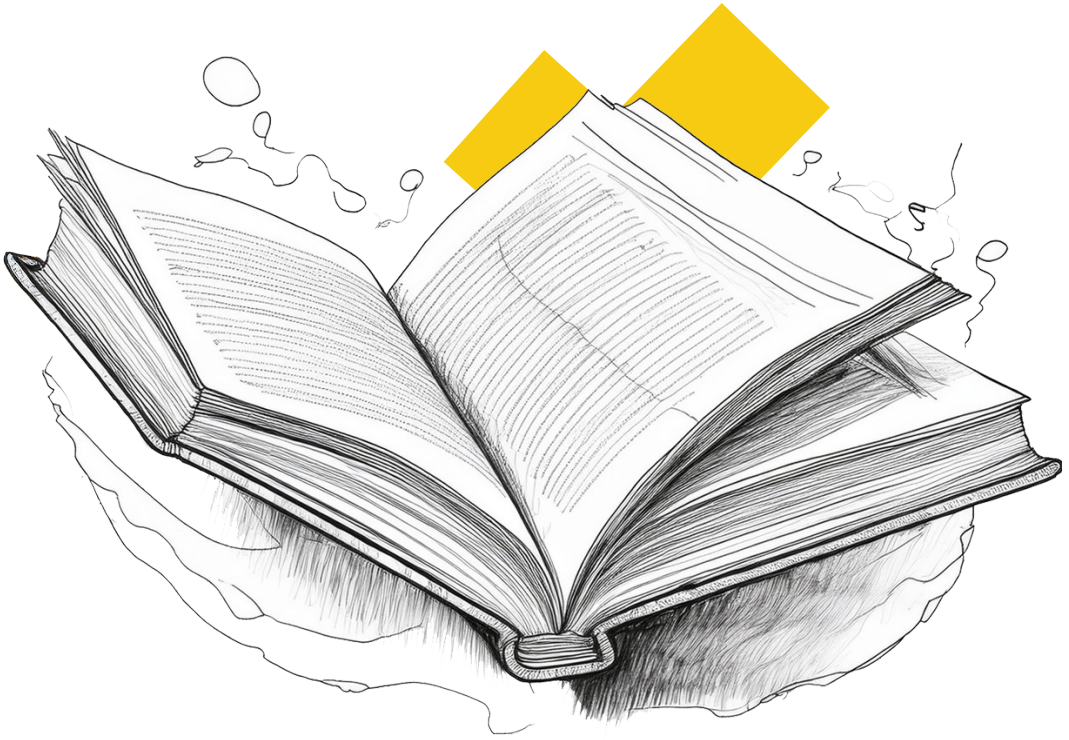
## **Strengthening institutional capacity**

The challenge successfully addressed by NABU was the crisis related to potential information leaks. This issue sparked public concern, but was ultimately resolved through personnel decisions, enhanced internal procedures, and the introduction of additional safeguards. As a result, NABU has emerged stronger both in terms of its values and management approaches. We have improved our internal monitoring system, minimizing the risks of similar situations in the future.

Conducting the audit and addressing these challenges is not solely NABU's task - it is a shared goal of society, the political establishment, and international partners. The success of anti-corruption reform is the key to effective governance, public trust in the state, and Ukraine's sustainable development.

# 04

**APPENDICES**



**SCAN THE QR CODE FOR APPENDICES THAT CONTAIN  
STATISTICAL INFORMATION ON THE NABU AND SAPO  
WORK IN THE SECOND HALF OF 2024**





## **CONTACT THE NATIONAL BUREAU**



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(for mass media)

## **NATIONAL BUREAU IN SOCIAL NETWORKS**



