

2025

FIRST HALF

NABU







NABU DIRECTOR

SEMEN KRYVONOS

The first half of 2025 was a period of trials, challenges, and key victories for NABU that opened new horizons and strengthened the institution's independence.

For the first time in its history, NABU and SAPO came under unprecedented legislative pressure that restricted our powers and threatened the ability to investigate high-level corruption effectively. The law, which significantly curtailed our autonomy, was passed without public debate and in defiance of the position of civil society and international partners.

This was accompanied by public searches targeting NABU staff, as well as a large-scale information campaign aimed at discrediting the Bureau and its employees. However, due to strong public backlash, a new law restoring the independence of NABU and SAPO was adopted within days.

Notably, during the first half of 2025, for the first time in Ukraine's history, the highest-ranking government official was held criminally liable, confirming our ability to independently and effectively investigate corruption — even at the highest levels.

A former Deputy Head of the Presidential Office was also served with a notice of suspicion for bribery and money laundering. A unique operation called “Clean City” was conducted to neutralize a criminal organization that controlled land-related decisions in Kyiv. Two major corruption schemes were uncovered at the Ministry of Defense: a price inflation scheme for military food supplies that caused losses of UAH 733 million, and the embezzlement of UAH 246 million during the development of the Armed Forces' automated control system “DZVIN.”

During this period, NABU also underwent an independent international audit — the first comprehensive external review of the Bureau's activities in ten years. The results confirmed the Bureau's effectiveness, particularly in pre-trial investigations, and affirmed its institutional independence and resilience.

Despite pressure and challenges, NABU continues to fulfill its core mission: holding top officials accountable for grand corruption. In the first half of 2025, based on NABU and SAPO materials, 115 individuals were served with notices of suspicion, including high-ranking officials, such as the Deputy Prime Minister. The economic impact of our work exceeds UAH 16.8 billion, with UAH 2.8 billion allocated to support the Armed Forces of Ukraine.

115 INDIVIDUALS WERE SERVED
WITH NOTICES OF SUSPICION



THE ECONOMIC IMPACT OF OUR WORK EXCEEDS

UAH **16.8** BILLION, UAH **2.8** BILLION ALLOCATED TO SUPPORT
WITH THE ARMED FORCES OF UKRAINE

We remain focused on improving internal processes and overcoming external limitations to enhance the effectiveness of investigations **in key sectors — defense, energy, reconstruction, customs, and the tax system.**

**THANK YOU TO ALL EMPLOYEES, PARTNERS, AND MEMBERS
OF THE PUBLIC FOR YOUR CONTINUED SUPPORT.**



SAPO HEAD

OLEKSANDR KLYMENKO

The first half of 2025 has become one of the most pivotal periods in the history of SAPO and NABU. It was a time of serious challenges, significant achievements, and decisions that have influenced not only our institutions, but the entire anti-corruption system in Ukraine.

Over the course of six months, SAPO prosecutors together with NABU detectives issued 115 notices of suspicion in cases involving individuals from the highest levels of power – including in the defence sector, the judiciary, and state-owned enterprises – and submitted 69 indictments to court against 154 persons. We are sending a clear message: the rule of law allows for no exceptions, and those guilty of high-level corruption will be held accountable, regardless of their position.

There have also been new results in the application of civil forfeiture mechanisms. During this period, SAPO prosecutors filed 24 claims for the recovery of unjustified assets in favour of the state, amounting to over UAH 135 million – more than in all previous years combined.

Approximately UAH 2.7 billion has been transferred to support Ukraine's Defence Forces, derived from forfeited bail, fines under plea agreements, and other procedural instruments.

One of the most significant milestones was the announcement of an open competition for the position of SAPO prosecutors. This is the first competition held since SAPO became a separate legal entity, distinct from the Prosecutor General's Office. As a result, the SAPO team will be joined by new qualified prosecutors. I firmly believe that a professional and purpose-driven team is the foundation of SAPO's institutional capacity, and that strengthening it is an investment in future effectiveness.

Alongside these achievements, we must also acknowledge a deeply troubling event that shook not only the anti-corruption institutions, but Ukrainian society as a whole – the adoption of Draft Law No. 12414 by the Verkhovna Rada of Ukraine, which dismantled the legal guarantees of independence for SAPO and NABU. Its adoption represented a direct attack on the anti-corruption infrastructure that has been built over more than a decade of determined effort. This move called into question our shared European future and sent a powerful signal to both Ukrainians and international partners: the fight for anti-corruption reform in Ukraine remains very much alive.

At the same time, we witnessed the strength of a genuine civil society in Ukraine – one that is prepared to defend its values of justice, European choice, and institutional independence through democratic means. This is a powerful force that inspires us and distinguishes Ukraine civilisationally from the morally bankrupt aggressor state.

We are deeply grateful to Ukrainian society for its steadfast support for an independent anti-corruption infrastructure, and to our international partners for their trust and for standing up in defence of the principles we all share. We also bow in deep respect to Ukraine's defenders, who – at the cost of immense personal sacrifice – continue to protect the country from a deadly invader.

The SAPO and NABU teams are acutely aware of the great trust that has been placed in us, and we are fully committed to honouring that trust. We know that our work is not a one-off campaign, but a daily, principled endeavour. We will not stop.

THE FIGHT AGAINST HIGH-LEVEL CORRUPTION WILL NOT BE EASY. BUT IT IS PRECISELY THIS FIGHT THAT IS A NECESSARY CONDITION FOR UKRAINE'S LONG-AWAITED EUROPEAN FUTURE.

10

AUDIT

14

INVESTIGATION

42

ICD

ЭМ

48

INTERACTION

56

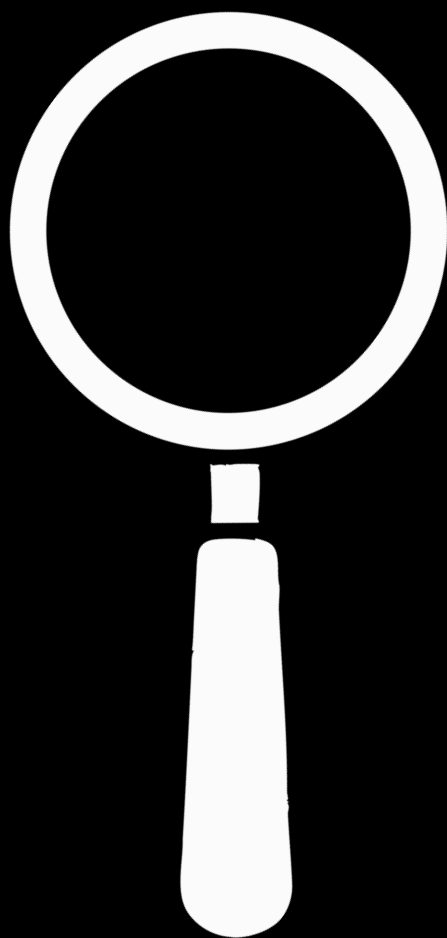
CHALLENGES

58

APPENDICES

A graphic design featuring a black background. A spotlight beam, represented by a yellow-to-white gradient, shines from the top right towards the bottom center, creating a circular pool of light at the base. The word "AUDIT" is written in bold, white, uppercase letters in the center of the spotlight.

AUDIT



FOR THE FIRST TIME IN ITS 10 YEARS OF OPERATION, THE NATIONAL ANTI-CORRUPTION BUREAU OF UKRAINE (NABU) UNDERWENT AN EXTERNAL INDEPENDENT ASSESSMENT OF ITS EFFECTIVENESS, CONDUCTED BY INTERNATIONAL EXPERTS. THE AUDIT WAS NOT ONLY A SNAPSHOT OF WHERE WE STAND, BUT ALSO A GUIDE FOR THE INSTITUTION'S FUTURE DEVELOPMENT. ITS CONDUCT IS MANDATED BY LAW AND IS PART OF UKRAINE'S INTERNATIONAL OBLIGATIONS IN THE FIELD OF ANTI-CORRUPTION REFORM.



The assessment covered the period from March 2023 to November 2024. The commission worked for nearly six months, and the final conclusions were published in the spring of 2025. The evaluation was carried out by an independent commission of three experts delegated by international partners.

The audit concluded that NABU is moderately effective

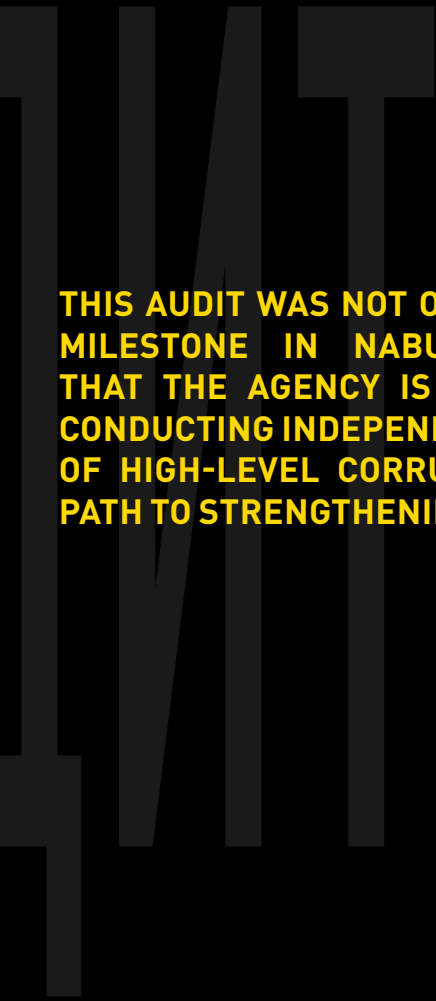
In particular, NABU was found to be sufficiently effective under the key criterion of pre-trial investigation — one of the highest possible ratings under the methodology approved by the commission. The auditors also confirmed an adequate level of institutional independence and resilience of the Bureau, which is especially important in the context of the ongoing war.

The audit report includes a number of recommendations — both for improving internal processes (such as management systems, staff recruitment, and analytics) and for addressing external barriers that limit NABU's potential. Some of these recommendations have already been taken into account: the Bureau is developing an implementation plan with clear timelines, responsible persons, performance indicators, and resources.

At the same time, certain changes require political support from other state authorities. These include:

- introducing autonomous wiretapping capabilities;
- establishing an independent forensic expert institution;
- updating legislation regulating interagency cooperation;
- amendments to the Criminal Procedure Code of Ukraine.

THESE DECISIONS ARE CRITICALLY IMPORTANT FOR ENHANCING NABU'S CAPACITY IN PRIORITY AREAS — PARTICULARLY IN INVESTIGATING CORRUPTION IN DEFENSE, ENERGY, CUSTOMS, AND TAXATION.



THIS AUDIT WAS NOT ONLY A TEST BUT ALSO A SIGNIFICANT MILESTONE IN NABU'S DEVELOPMENT. IT CONFIRMED THAT THE AGENCY IS FULFILLING ITS CORE MANDATE — CONDUCTING INDEPENDENT AND EFFECTIVE INVESTIGATIONS OF HIGH-LEVEL CORRUPTION CRIMES — AND OUTLINED A PATH TO STRENGTHENING ITS PERFORMANCE IN THE FUTURE.



INVESTIGATION

PRETRIAL INVESTIGATION

The first half of 2025 saw a series of high-profile exposures by NABU and SAPO, particularly in the defense, land, and healthcare sectors. As in previous reporting periods, the focus remained on uncovering high-level corruption amid the ongoing full-scale aggression by the Russian Federation.

A total of 115 individuals were named suspects — **nearly twice as many as in the previous reporting period.** For the first time in the history of NABU and SAPO, a sitting Deputy Prime Minister of Ukraine was exposed for corruption. A former Deputy Head of the Presidential Office was also notified of suspicion over bribery and money laundering. A unique operation dubbed “Chyste Misto (Clean City)” was carried out to dismantle a criminal organization that controlled decision-making regarding land rights in Kyiv. Two major corruption plots were uncovered in the Ministry of Defense: a price inflation scheme for food supplies to the military, which caused UAH 733 million in damages, and the embezzlement of UAH 246 million allocated for the development of the automated command system “DZVIN” for the Armed Forces of Ukraine. A criminal group of judges and lawyers was also uncovered — they assisted draft-age men in illegally leaving the country and obtaining deferrals from mobilization for a fee. Another group was exposed for leaking information about investigative actions by unlawfully accessing the closed section of the Unified Register of Court Decisions.



PRETRIAL INVESTIGATION

154 individuals were brought to trial. Among them: a former Head of the National Bank of Ukraine, accused of embezzling over UAH 206 million from Ukrgasbank; a Member of Parliament who orchestrated a gas-related corruption deal worth over UAH 2.1 billion; and participants in multimillion misappropriations involving the construction of warehouses for the Ministry of Defense, procurement of reactive armor for military vehicles, and bulletproof vests.

Thanks to the efforts of NABU and SAPO, seven individuals are being prosecuted for misappropriating the property and funds of PJSC Ukrnafta (50%+1 share owned by the state-run Naftogaz of Ukraine), as well as members of a criminal organization that minimized customs payments and caused over UAH 475 million in damages to the state. Also on trial are 11 individuals involved in nearly half a billion hryvnia shenanigans during the sale of seized assets managed by the Asset Recovery and Management Agency.

The High Anti-Corruption Court issued 43 guilty verdicts against 54 persons. The former Chairman of the Board of PJSC "HC "Energomerezha" received two prison sentences — 15 and 10.5 years — for causing hundreds of millions of hryvnias in damages to the state. A Member of Parliament was sentenced to up to 7 years in prison for unlawfully receiving USD 85,000 to ensure a private company received a lease on state-owned land. The former Head of the Ternopil Regional Council was convicted of accepting over UAH 600,000 from a businessman-volunteer and sentenced to 9 years behind bars. Four former officials of Ukrzaliznytsia were sentenced to 8–9 years in prison after being found guilty of embezzling over UAH 98 million during the procurement of fuel and lubricants.

In the first half of 2025, Ukraine successfully extradited two key suspects from abroad: a member of an organized group that embezzled UAH 94.8 million during the procurement of power transformers for JSC "Ukrzaliznytsia," and the former head of the Kyiv regional office of the StateGeoCadastre, suspected of seizing over 1,200 hectares of land near Kyiv worth over UAH 1.8 billion.

Due to NABU and SAPO efforts, an elite yacht worth EUR 5.5 million, owned by a co-leader of a criminal organization operating within the State Property Fund of Ukraine, was seized in Italy. In France, a court froze property belonging to a former executive of a state special exporter, acquired with illegally siphoned funds. The assets included a villa, a winery, and land plots worth at least EUR 13 million.

The total value of assets seized in NABU and SAPO cases sent to court during the reporting period exceeded UAH 2.3 billion.

A dark background with a large, faint, light-colored graphic of the letters 'YVBD' and 'R' on the left and right sides. A bright yellow spotlight beam shines down from the top center, illuminating the text 'HIGH-PROFILE CASES' in the center. The beam is wider at the top and tapers to a bright yellow oval at the bottom.

HIGH-PROFILE CASES

CORRUPTION IN THE MINISTRY FOR DEVELOPMENT



In June, for the first time in the history of NABU and SAPO, a sitting Deputy Prime Minister of Ukraine was exposed for corruption. This proves that no one is untouchable for anti-corruption agencies. According to the investigation, a real estate developer approached the Ministry for Communities and Territories Development seeking a land plot for the construction of a residential complex. In collusion with other officials, the head of the ministry — who later became Deputy Prime Minister — facilitated the transfer of the land to a state-owned enterprise under his control, which subsequently signed contracts with a “preferred” construction company. Under the scheme, the developer was obligated to transfer a number of the apartments in the new building to the state in proportion to the value of the land. To minimize this obligation, the land and the buildings on it were undervalued by nearly five times. The minister and his designated associates were “rewarded” with discounted apartments in already constructed buildings: the price per square meter ranged from UAH 1,000 to 8,000, while the market price was approximately UAH 30,000. The illicit benefit received by the minister in the form of these discounts exceeded UAH 14.5 million. **Thanks to NABU and SAPO, the land plot was seized, preventing potential damages to the state amounting to UAH 1 billion.** Six individuals involved in the scheme — including the sitting Deputy Prime Minister of Ukraine, the former State Secretary of the Ministry for Development (who was a board member of Naftogaz of Ukraine at the time), a former minister’s adviser, a former director of the state-owned enterprise, the developer, and a representative of the construction company — were served with notices of suspicion. **The investigation is ongoing.**

ANTI-CORRUPTION OPERATION “CLEAN CITY”



In February, NABU and SAPO dismantled a criminal organization that had taken control over decision-making for land allocation in Kyiv. In total, 10 high-ranking officials and other individuals were served with notices of suspicion. **This was the result of the large-scale “Clean City” operation targeting corruption in the capital’s land and budget sectors.** The members of the criminal organization used the so-called “toilet” scheme — they forged ownership rights to non-existent constructions and turned to the City Council, asking for the use of land underneath these fake buildings, bypassing open auctions. In return, they received illicit benefits — money and real estate — from newly minted landowners. The organization was led by a media-known former member of the Kyiv City Council who exerted considerable influence over personnel decisions and budget distribution therein. Under his supervision, land plots were allocated to “preferred” persons. Others faced artificial obstacles, forcing them to turn to the criminal group for help. To conceal their activities, the group used specialized mobile communication terminals, aliases, and counter-surveillance tactics. Land and other administrative issues were resolved not in the Kyiv City Council, as required, but in a completely different building that served as a shadow “decision-making center.” Despite these measures, NABU and SAPO successfully uncovered the criminal scheme that resulted in the illegal removal of land in central Kyiv worth UAH 11.6 million from municipal ownership. **Thanks to the timely intervention by law enforcement, the illegal seizure of six additional plots totaling UAH 83.7 million was prevented. Currently, investigators are examining whether the suspects committed additional crimes aimed at seizing more land in the capital.**

CASE OF THE FORMER DEPUTY HEAD OF THE PRESIDENTIAL



In April, NABU and SAPO uncovered new episodes of corruption involving the former Deputy Head of the Office of the President of Ukraine — the legalization of illicit assets and the receipt of unlawful benefits. He had previously been notified of suspicion of illegal enrichment.

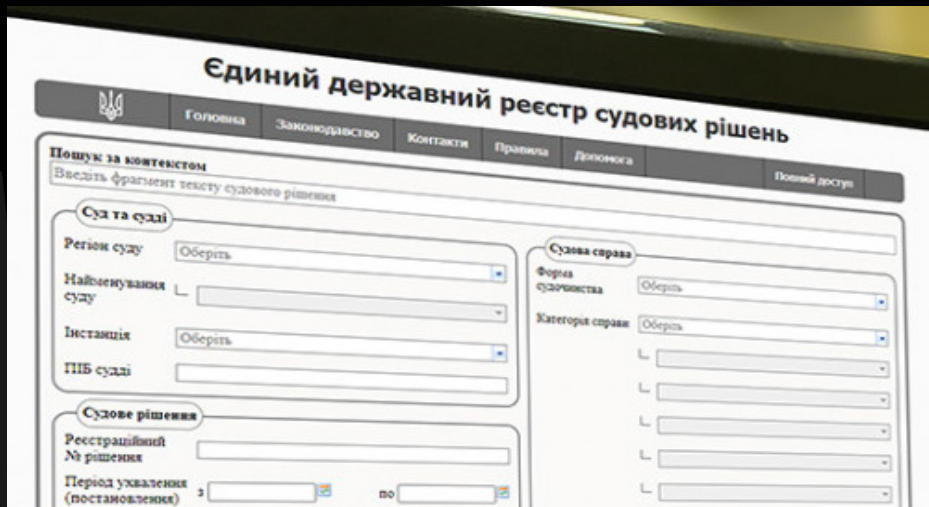
According to the investigation, between 2019 and 2021, the suspect unlawfully acquired large amounts of cash, which he sought to launder by investing in the construction of over 300 square meters of real estate in a recreational area of the Odesa region.

He transferred UAH 6.5 million to a company that owned coastal land for the construction of residential properties. The completed buildings, which the official effectively used, were initially registered under the company and later re-registered to a trusted associate.

Furthermore, in 2022, a developer approached the suspect and offered services worth USD 100,000 for the construction of one of the beachfront houses. In exchange, he requested assistance in canceling the results of a tender won by a competitor and ensuring the selection of a “preferred” company. The official accepted the offer, abused his position, and fulfilled the agreed arrangements.

In May, NABU detectives, together with SAPO prosecutors, completed the investigation of all episodes in the case. After the defense reviews the case materials, the indictment will be sent to court.

SCHEME OF ILLEGAL ACCESS TO RESTRICTED COURT DECISIONS



As part of systematic efforts to combat information leaks, NABU and SAPO uncovered a scheme involving unauthorized access to the restricted section of the Unified State Register of Court Decisions. Two lawyers and the de facto head of a law firm were served with notices of suspicion.

The suspects illegally obtained a judge's electronic key and accessed the restricted section of the court decisions register to retrieve information about rulings on motions filed by law enforcement agencies and the prosecution.

To facilitate this, they developed a special script that automatically collected data and the contents of new court decisions every 12 hours regarding their clients. The script also allowed for manual searches within the registry.

The information obtained through this illegal access was then used for criminal purposes. Specifically, the suspects monitored court rulings granting permission for searches and other investigative actions to warn their clients. The unlawfully obtained data were also used to prepare for investigative actions, destroy physical evidence and documents, and help suspects evade criminal liability.

In total, 39,615 search queries were made and 7,572 court decisions were viewed.

Uncovering this scheme marked a significant contribution to preventing the leakage of restricted information, which severely undermines the work of law enforcement agencies and often nullifies the efforts of detectives and prosecutors.

EXTORTION OF USD 150,000 BY ESB AND POLICE OFFICERS



In June, NABU and SAPO exposed yet another egregious case of corruption involving law enforcement officers. Two former detectives of the Economic Security Bureau (ESB) and an investigator from the Kyiv region police were served with notices of suspicion for demanding a bribe from a company executive.

The perpetrators asked for a substantial sum — USD 150,000. In return, they promised not to prosecute the entrepreneur and to unblock the company's bank accounts. They also exerted pressure on the businessman, attempting to convince him of the inevitability of criminal punishment, a guilty verdict, and asset confiscation.

Unwilling to become a victim of unlawful actions, the entrepreneur reported the extortion attempt to law enforcement authorities.

Following the public disclosure of investigative actions, the suspects were dismissed from their positions.

One of the former ESB detectives was taken into custody, with bail set at UAH 4.24 million. The second detective and the former police officer were remanded on bail.

At the end of June, the investigation was completed. Once the defense has reviewed the case materials, the indictment will be submitted to court.

MISAPPROPRIATION OF FUNDS FOR MEDICAL EQUIPMENT FOR CANCER PATIENTS



In June, NABU and SAPO exposed a large-scale scheme involving the embezzlement of public funds allocated for the purchase of medical equipment for cancer patients. According to the investigation, the de facto head of the largest group of medical equipment suppliers established a criminal organization composed of representatives from affiliated companies and officials of the National Cancer Institute. The primary goal was to secure non-competitive victories in the Institute's tenders under the project "Establishment of a Modern Clinical Base for the Treatment of Oncological Diseases at the National Cancer Institute." First, to gain full control over equipment procurement, the Cancer Institute was designated as the manager of the budget funds. Second, the medical equipment market was only superficially analyzed, with requests sent exclusively to affiliated companies. Third, conditions were created to disqualify any independent or non-affiliated tender participants. Fourth, to embezzle the maximum amount of funds, the prices of medical equipment were artificially inflated — in some cases by up to four times the original value. Affiliated foreign companies were inserted into the supply chain, equipment configurations were altered, and other manipulations were conducted. This has been confirmed by a range of evidence collected by law enforcement authorities across 12 countries. **As a result, the scheme's participants misappropriated over UAH 231 million in public funds. Six individuals were served with notices of suspicion. The investigation is ongoing.**

CORRUPTION AT WARTIME



Embezzlement of public funds during wartime is tantamount to looting — profiting from the suffering of those affected by war. NABU and SAPO are making every effort to dismantle disgraceful corruption schemes both in the national recovery and defense sectors.

At the beginning of the year, an organized group was exposed for embezzling over UAH 129 million allocated for the restoration of critical infrastructure in the Dnipropetrovsk region. The case involves a water supply system in the Kamianske district, which was to be reconstructed by a company controlled by a local businessman. The company unlawfully won the tender, while its owner is wanted by the FBI for property-related crimes. The cost of works and materials was inflated by over UAH 129 million, which the perpetrators misappropriated and used at their discretion. **The investigation is ongoing.**

Another organized group was exposed for causing losses of nearly UAH 60 million to the National Energy Company “Ukrenergo.” According to the investigation, in 2022, a deputy of the Kharkiv Regional Council (who was formerly Deputy Head of the Kharkiv Regional Military Administration) and two accomplices purchased three companies that received electricity from Ukraine’s United Energy System and transferred it to a related company for sale to end consumers. Financial responsibility was left on intermediary companies, which never settled payments with Ukrenergo. To cover their tracks, the proceeds from electricity sales were transferred to financial companies under the guise of loan repayments and then funneled to other affiliated companies, eventually ending up in the account of a non-resident company registered in Bulgaria. **Three individuals were served with suspicion notices; the investigation has been completed.**

Meanwhile, the probe into the embezzlement of funds for transformer equipment for JSC “Kharkivoblenergo” is still ongoing. In June, NABU and SAPO identified the organizer of the scheme. According to the investigation, he took control of procurement at Kharkivoblenergo and planned to embezzle over UAH 132 million. The company director, also a suspect in the case, agreed to follow his instructions to sign contracts with affiliated firms at prices inflated up to fivefold. NABU and SAPO served the scheme’s organizer with a notice of suspicion as he attempted to leave Ukraine. **A year earlier, seven other participants had already been notified of suspicion.**

Another scheme, exposed by NABU and SAPO in the Odesa region, also involved illegal attempts to leave the country. An organized criminal group fabricated court rulings declaring that a father was the sole caregiver of a child — a reason that allowed military-aged men to leave Ukraine legally. The group operated from within the judiciary and maintained a “back office” at a law firm for cover. They charged USD 3,500 for each ruling. The perpetrators were so confident in their impunity that they even advertised their “services” on social media. In total, investigators identified 1,040 suspicious court decisions. **Eleven participants in the scheme were served with suspicion notices.**



DEFENSE SECTOR



Uncovering corruption in the defense sector is one of the key priorities for NABU and SAPO, as such schemes not only cause substantial financial losses to the state but also undermine the country's defense capability amid full-scale war. **One of the most high-profile cases became known as the “Defense Ministry Egg Case,”** which sparked public outrage due to eggs being procured at UAH 17 apiece. However, the inflated pricing involved more than just eggs. According to the investigation, food supplies for the military were purchased in bundles — this allowed suppliers to raise prices on essential items (vegetables, grains) while underpricing less common ones (spices, berries). Through this scheme, supplier companies unlawfully gained excess profits amounting to over UAH 733 million. After the media exposed the scheme, prices for the 11 most demanded products were reduced, saving the state UAH 788 million. Following NABU and SAPO's recommendations, the Ministry changed its procurement procedures. The investigation is ongoing.

Another high-profile case involves the embezzlement of funds allocated for the automated command system “DZVIN” of the Armed Forces of Ukraine. Detectives discovered that the Ministry of Defense had signed a contract for system development with a company lacking relevant experience. During implementation, the cost of the project multiplied several times, yet the final product still failed to meet the required standards. Despite obvious flaws, the system was officially accepted into service, and instead of addressing the issues, there were plans to allocate additional funds. Due to these abuses, the state suffered losses of UAH 246 million. Earlier this year, four individuals involved in the scheme were served with notices of suspicion.

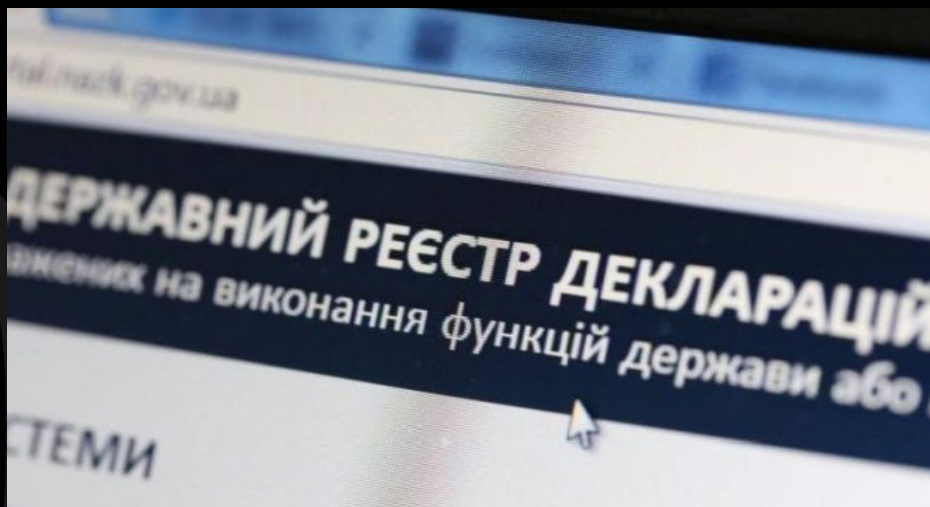
The Ministry of Defense also sustained major losses during the procurement of tires for military aviation. According to the investigation, an assistant to a sitting MP, along with accomplices, facilitated the success of a private company in tenders. The company's owner, using a controlled EU-based firm, purchased tires directly from manufacturers and sold them to the military at 2–3 times the original price. As a result, the Logistics Forces of the Armed Forces of Ukraine overpaid UAH 27.3 million. NABU and SAPO have issued notices of suspicion to those involved.

Another corruption case was uncovered in Ukroboronprom. Between 2011 and 2016, the head of one of the state-owned special exporters — part of the Ukroboronprom conglomerate — illegally transferred funds to foreign companies under the guise of “agency fees” for arms sales. As a result, at least EUR 13 million ended up in his personal accounts and was spent on real estate in France. In total, NABU and SAPO accuse the former official of embezzling and laundering over USD 23 million. His foreign assets have been seized by the court, and extradition proceedings are underway.

“Agency agreements” also led to further losses for Ukroboronprom. A state enterprise that exported military products paid UAH 146 million for fictitious services. As NABU and SAPO established, all actual work had been performed by the enterprise's employees. The money was transferred to two foreign companies, laundered, and distributed among members of the criminal group. Among the suspects are former state enterprise officials and the beneficial owner of private companies.



UNDECLARED ASSETS, ILLICIT ENRICHMENT, AND MONEY LAUNDERING



Undeclared assets of high-ranking Ukrainian officials are a recurring reason for the start of criminal proceedings. Anti-corruption authorities thoroughly investigate each case and refer the collected evidence to court.

A new suspicion of asset concealment was reported against the Head of the Antimonopoly Committee of Ukraine. It concerned the 2024 asset declaration, in which the official failed to disclose real estate and a vehicle registered to the relatives of his wife. She was also served with a notice of suspicion — for aiding in her husband's illicit enrichment. **The Head of the State Customs Service of Ukraine was also caught failing to declare assets worth over USD 100,000.** According to the investigation, between 2021 and 2023, he “forgot” to include in his declaration a 236.8 sq.m. house near Kyiv and a land plot. Both were registered to his father-in-law, but in fact used by the official and his family. The case has been referred to court. **The former head of the Ternopil Regional Council also faced trial after being exposed in February for concealing assets worth over UAH 2 million.** In his 2022–2023 declarations, he failed to disclose his mother's apartment, which he and his family used, as well as other assets. This year, the ex-official was also convicted in another case — for receiving a bribe of UAH 600,000 — and sentenced to 9 years in prison. **A Member of Parliament was exposed for a failure to declare a house and two land plots.** The estate was purchased by her husband, with funds — UAH 20 million — loaned to him by the MP herself. Moreover, the money was of unknown origin, which had earlier led to a notice of suspicion from NABU and SAPO for illicit enrichment. Both were found guilty based on plea agreements and were ordered to pay a fine, transfer UAH 20 million to the state budget, and contribute UAH 2 million to the needs of the Armed Forces of Ukraine.

CORRUPTION AT UKRZALIZNYTSIA



NABU and SAPO continue to expose large-scale embezzlement schemes within Ukrzaliznytsia (Ukrainian Railways).

In June, five persons were served with notices of suspicion for embezzling company funds. According to the investigation, the scheme's organizer used loyal employees within an Ukrzaliznytsia branch to ensure that favored companies won procurement tenders for paint and linoleum. Subsequently, the beneficial owners and representatives of these companies, in collusion with the organizer, facilitated the signing of overpriced supply contracts with Ukrzaliznytsia. As a result, between 2022 and 2023, the company suffered losses exceeding UAH 15 million, which the perpetrators misappropriated and used at their discretion. The investigation is ongoing.

Another suspicion notice was served to a sitting Member of Parliament.

According to NABU and SAPO, he co-organized a group that embezzled UAH 140 million during the procurement of cable and wiring products for Ukrzaliznytsia. Together with an accomplice — a private entrepreneur — the MP conspired with members of another organized group that operated as a sort of "back office" for the company. In exchange for a percentage of the contract value, they ensured the entrepreneur's affiliated companies won the tenders. These companies then sold the products at prices significantly above market rates. **In total, eight individuals have been notified of suspicion in this case.**



**NABU AND SAPO'S
WORK IN NUMBERS** (as of 30.06.2025)

365 **SUSPECTS**

696 **INDICTMENTS**

1429 **ACCUSED**

**NABU AND SAPO'S
WORK IN NUMBERS** (in the first half of 2025)

370

**NEW
INVESTIGATIONS**

115

SUSPECTS

69

INDICTMENTS

154

ACCUSED

EXPOSED IN THE FIRST HALF OF 2025

4 

senior state officials

5 

"A" category civil servants

7 

deputies of regional councils

5 

judges

14 

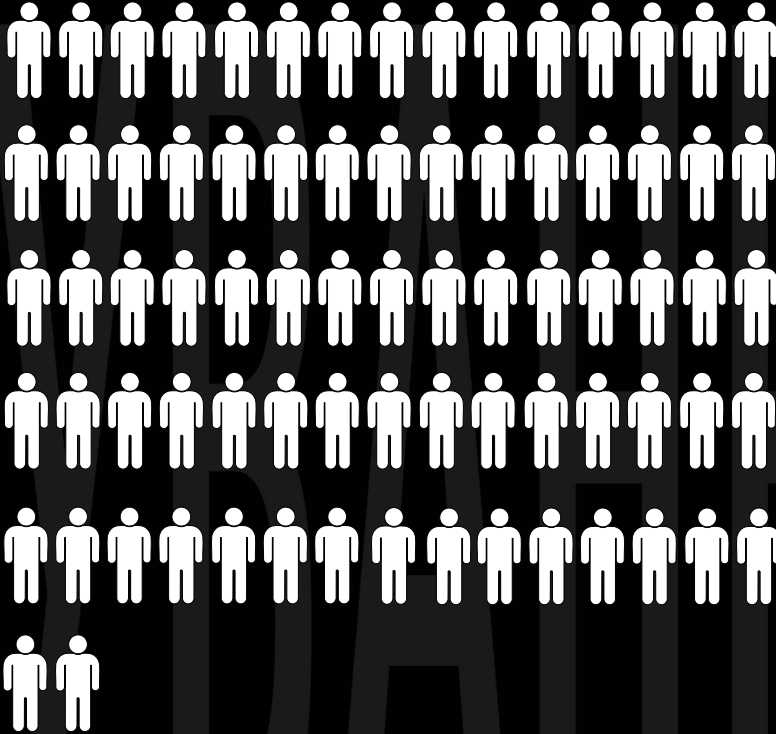
heads of state-owned enterprises

3 

senior officers of the Armed Forces of Ukraine, the SBU, etc.

EXPOSED IN THE FIRST HALF OF 2025

77 others



FACED TRIAL IN THE FIRST HALF OF 2025

5 

senior state officials

6 

deputies of regional councils

5 

"A" category civil servants

2 

judges

2 

senior officers of the Armed Forces of Ukraine, the SBU, etc.

19 

heads of state-owned enterprises

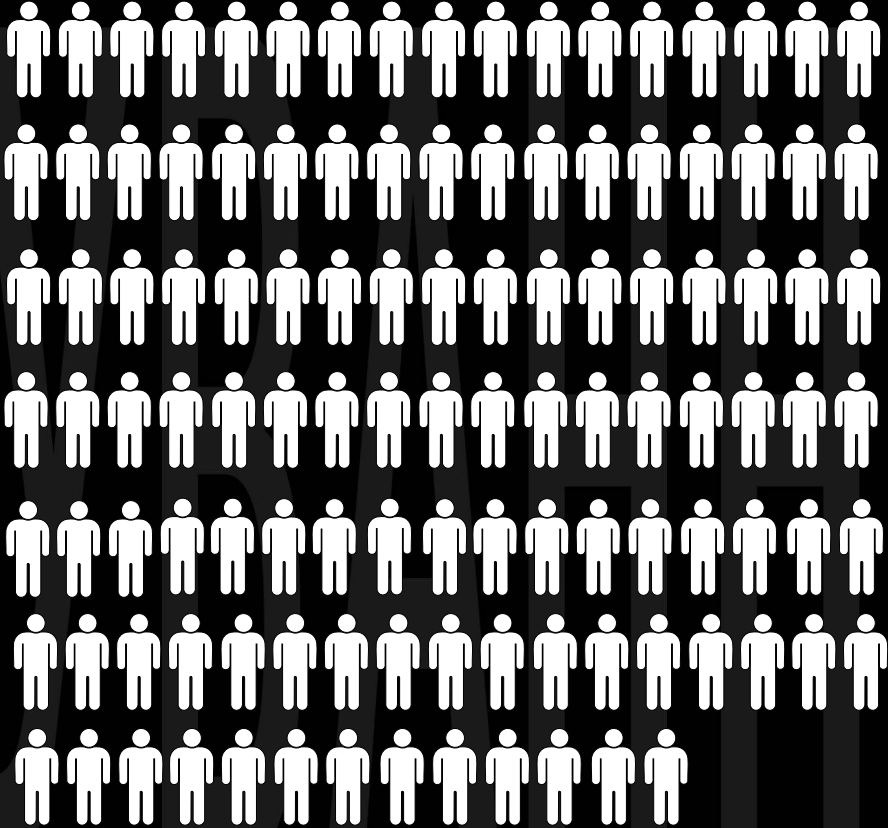


2 

prosecutors

FACED TRIAL IN THE FIRST HALF OF 2025

70 others



CONVICTED OF CORRUPTION* IN THE FIRST HALF OF 2025

3 

senior state officials

2 

deputies of regional councils

4 

judges

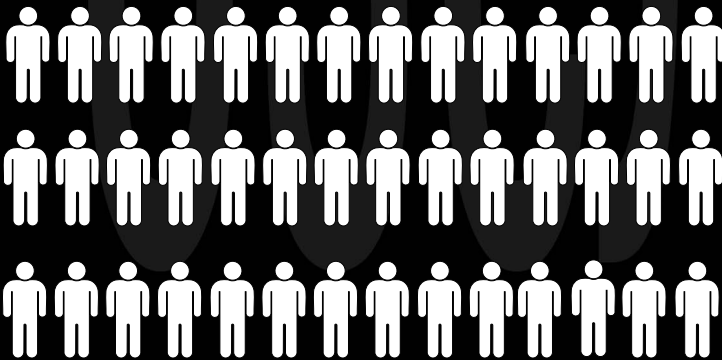
10 

heads of state-owned enterprises

1 

prosecutor

42 others



*sentences took effect



UAH 1.5+ BILLION IN 2025 FIRST HALF YEAR

ECONOMIC IMPACT OF NABU AND SAPO IN 2025 FIRST HALF YEAR

In the first six months of 2025, UAH 249 million was allocated to strengthening the country's defense capabilities. These funds were either seized or transferred under plea agreements within criminal proceedings investigated by NABU and SAPO, as well as bail payments redirected by decisions of the High Anti-Corruption Court (HACC).

**UAH 249
MILLION**

Since 2022, the total amount of assets transferred to support the military has surpassed UAH 2.85 billion.

**UAH 2.85
BILLION**

During the reporting period, the total value of monetary and property compensation in NABU and SAPO cases amounted to UAH 685 million.

**UAH 685
MILLION**

Of that, UAH 259.2 million was returned to the state budget as compensation for damages caused by a criminal organization that operated within the State Agency for Investment and National Projects.

**UAH 259.2
MILLION**

Over UAH 135 million was returned by private companies PJSC "Zaporizhzhyaoblenergo" and PJSC "Cherkasyoblenergo" in enforcement of 11 court rulings that declared void certain agreements on assignment of claims and debt transfer, based on lawsuits filed by the National Bureau.

**UAH 135
MILLION**

Additionally, UAH 32.2 million was returned by LLC "United Energy" to the account of PJSC "NEC Ukrenergo."

**UAH 32.2
MILLION**

UAH 10.7 BILLION AS OF 30.06.2025

As of June 30, 2025, a total of UAH 10.7 billion has been recovered for the state thanks to NABU and SAPO.

Throughout the first half of 2025, several convictions with asset confiscation totaling over UAH 512 million came into legal force. These assets included cash, gold, real estate, and shares.

NABU and SAPO also prevented the illegal appropriation of land in Kyiv worth nearly UAH 84 million.

Based on materials provided by NABU and SAPO, the Ministry of Justice of Ukraine filed a lawsuit for the confiscation of assets belonging to OJSC "Belaruskalii" worth nearly UAH 2.8 billion — a claim that was upheld by the High Anti-Corruption Court.

UAH 10.7
BILLION

UAH 512
MILLION

UAH 84
MILLION

UAH 2.8
BILLION



**REIMBURSEMENT IN CRIMINAL PROCEEDINGS
(BOTH UNDER INVESTIGATION AND SENT TO COURT)**

**UAH 10.7 BILLION AS
OF 30.06.2025**

**UAH 685 MILLION IN
THE FIRST
HALF OF 2025**

**UAH 2.85 BILLION FUNDS SENT TO
ARMY NEEDS BY COURT
ORDER AS OF 30.06.2025**

**UAH 249 MILLION FUNDS SENT TO ARMY
NEEDS BY COURT ORDER IN
THE FIRST HALF OF 2025**

ECONOMIC EFFECT OF NABU AND SAPO WORK IN THE FIRST HALF OF 2025

UAH **685** MILLION REIMBURSED TO THE STATE

UAH **249** MILLION DIRECTED TO ARMY NEEDS

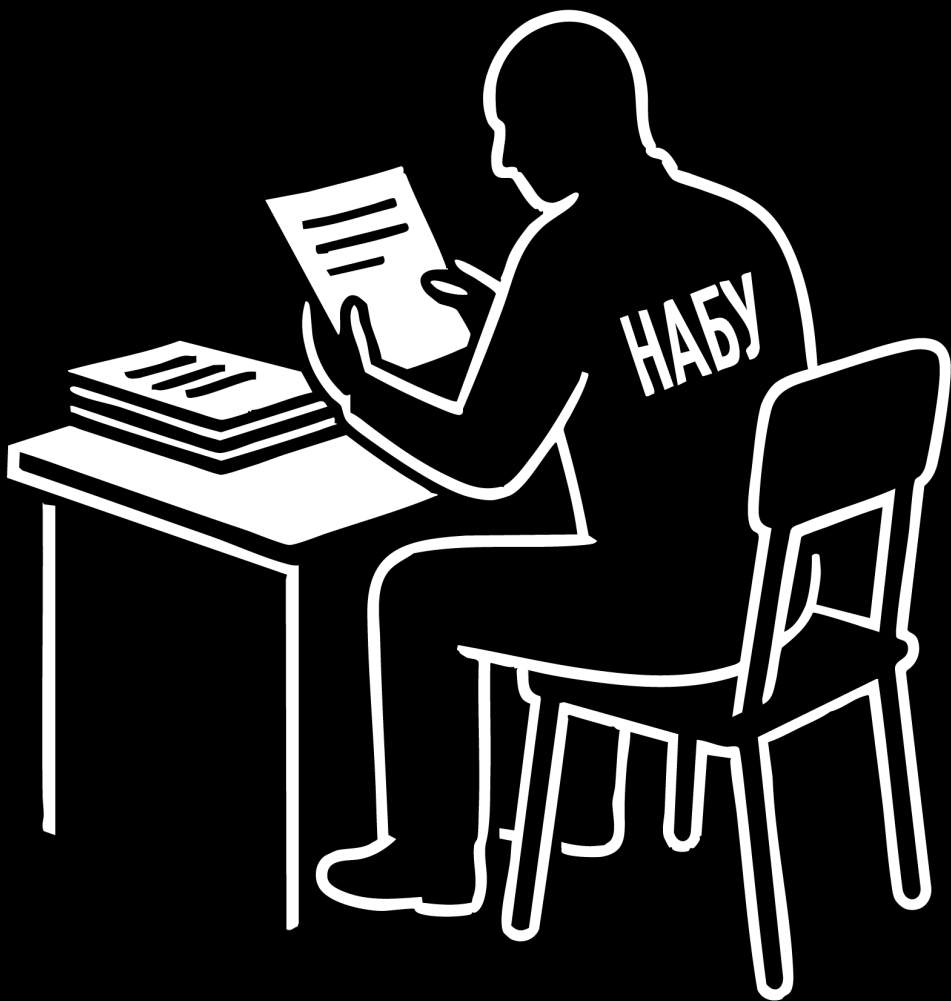
UAH **512+** MILLION CONFISCATED INTO STATE REVENUE

UAH **84** MILLION - VALUE OF PROPERTY, THE MISAPPROPRIATION OF WHICH WAS PREVENTED

UAH **1.5+** BILLION TOTAL



**INTERNAL
CONTROL
DEPARTMENT**



ACTIVITIES OF THE INTERNAL CONTROL DEPARTMENT

In the first half of 2025, the activities of the NABU Internal Control Department (ICD) focused on monitoring employees' compliance with legal requirements, conducting integrity checks, responding to possible violations, evaluating candidates, and taking measures to prevent the leakage of official information.

Various tools were employed to monitor compliance with declaration requirements. Candidates for positions underwent assessments of their personal, professional, and moral qualities, as well as psychophysiological testing using a polygraph. In total, 231 individuals were screened, including 59 current NABU employees.

During the candidate background checks conducted over the six-month period, the ICD sent over 700 requests to state authorities. Checks were initiated for 73

IN TOTAL

231 INDIVIDUALS WERE SCREENED, INCLUDING **59** CURRENT NABU EMPLOYEES

During the candidate background checks conducted over the six-month period, the ICD

700+ REQUESTS TO STATE AUTHORITIES

CHECKS WERE INITIATED FOR

73 INDIVIDUALS, OF WHICH **66** WERE COMPLETED

As part of ongoing monitoring of employees' financial and property status, over 500 notifications of concluded transactions were analyzed. In one case, grounds were identified for an administrative protocol regarding the violation of gift-receiving restrictions. The case materials were referred to the National Police.

Each year, the ICD checks the timely submission of asset declarations by NABU staff. Of 731 declarations submitted this year, one case of late submission was identified. Additionally, the analysis prompted lifestyle monitoring for two employees. In one case, a disciplinary investigation was initiated, and the materials were sent to the National Agency on Corruption Prevention.

Based on the review of 242 appeals and complaints, 11 internal investigations were launched. Five employees were subjected to disciplinary action: two were dismissed, one received a severe reprimand, another received a reprimand, and one was issued a warning.

In line with the recommendations from the whistleblower interaction audit (conducted with UNODC support in November–December 2024), the ICD continues to improve its internal procedures for handling whistleblower reports, particularly with regard to ensuring anonymity.

To reduce the risk of information leaks in NABU cases, the ICD, in cooperation with detective units, assessed the relevant risks at each stage of investigations and prepared practical recommendations on information handling.



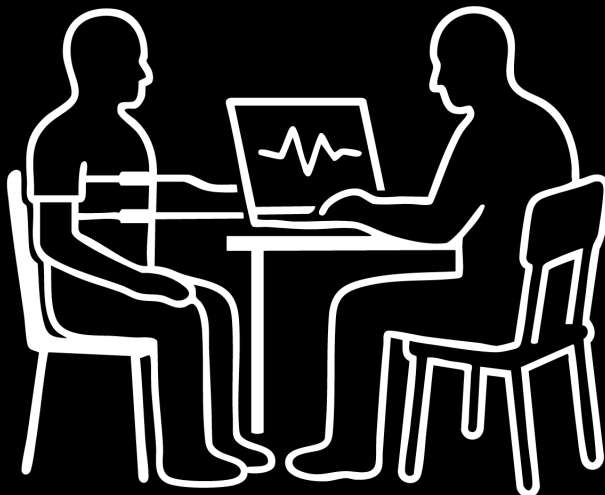
POLYGRAPH EXAMINATIONS

from 01.01.2025 to 30.06.2025

202 IN CONNECTION WITH
CANDIDATE SCREENING
FOR POSITIONS

2 TO MONITOR COMPLIANCE WITH
DECLARATION RULES

3 DURING INTERNAL INVESTIGATIONS

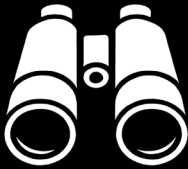


INTERNAL CONTROL IN FIGURES

from 01.01.2025 to 30.06.2025

242

COMPLAINTS AND REPORTS
RECEIVED REGARDING NABU
STAFF ACTIONS



16

INTERNAL
INVESTIGATIONS
CONDUCTED

5

NABU STAFF HELD
ACCOUNTABLE



2

LIFESTYLE MONITORING
PROCEDURES
CONDUCTED



INTERACTION

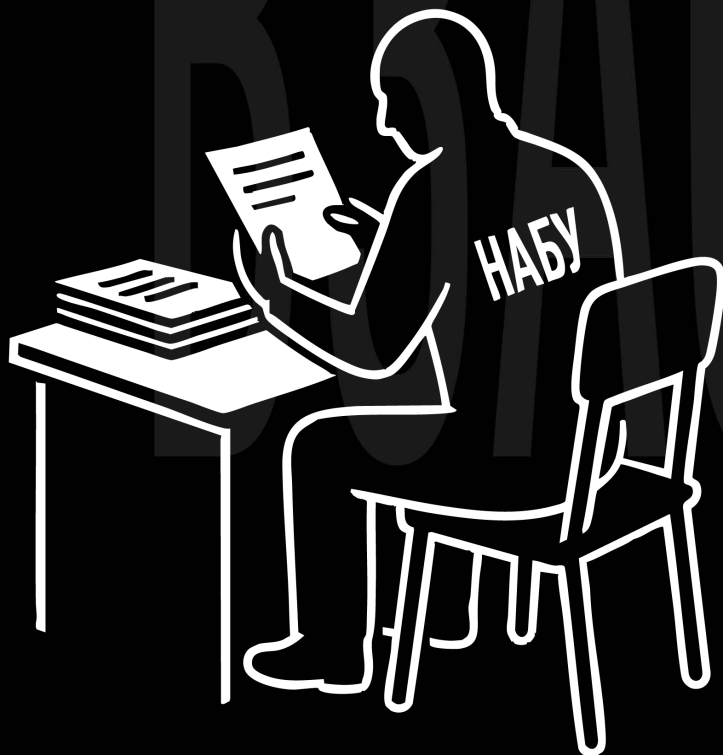


NABU: INSTITUTIONAL DEVELOPMENT, DIGITALIZATION, AND ENGAGEMENT WITH SOCIETY

During the reporting period, the National Anti-Corruption Bureau of Ukraine (NABU) continued to strengthen its institutional capacity, expand international cooperation, and actively involve the public in shaping a new anti-corruption culture. The focus of its activities included digital transformation of investigations, engagement of veterans in service, development of youth initiatives, and partnerships with international partners and anti-corruption bodies in other countries.

International Cooperation

NABU maintained close cooperation with international partners throughout the reporting period. During meetings with the ambassadors of the G7 and the EU, support for the independence of Ukraine's anti-corruption institutions was reaffirmed. A key area of collaboration was engagement with the Government of Japan and the JICA agency, which included experience exchange and training programs for detectives. In April, NABU's leadership participated in the Baltic Anti-Corruption Forum in Vilnius, where discussions focused on the role of anti-corruption efforts as a component of transnational security.



“eCase”: Digital Transformation of the Anti-Corruption Process

The “eCase” electronic criminal procedure system has become a key tool in optimizing the work of NABU, SAPO, and HACC. To date, more than 1,800 criminal proceedings and nearly 3,500 electronic motions submitted to court have been registered in the system.

Thanks to integration with the Unified Register of Pre-Trial Investigations and judicial information systems, eCase has significantly reduced the time required to prepare documents, eliminated the duplication of paper processes, and enhanced transparency. As of April, lawyers were granted remote access to motions, greatly improving communication between parties. By the end of the year, the system is expected to be expanded to include a sub-system for the registration of physical evidence and an increase in the number of procedural document templates to 70.

Veteran Policy: From Defending the Country to Defending Justice

NABU continues its policy of engaging veterans in its team, recognizing their experience and values as a powerful resource in the fight against corruption. In January 2025, a public discussion titled “Choosing the Future” was held in cooperation with EUACI, SAPO, NACP, HACC, and veterans’ organizations. Participants explored employment opportunities within anti-corruption agencies and discussed ways to integrate veterans into the law enforcement sphere.

A special training session was held for NABU selection commission members on ethical interaction with veterans, organized with the support of the Vesta Charitable Foundation. This was the first in a series of training programs designed to ensure sensitive and responsible approach to veterans’ needs during their employment process.

Student Engagement: A New Generation of Anti-Corruption Leaders

NABU is actively developing educational projects for young people. The online investigative game “NABU Investigates 2,” developed in collaboration with the EdEra studio and supported by EUACI, allows participants to go through all stages of an anti-corruption investigation — from evidence gathering to preparing an indictment. The game format immerses students in the real-life work of detectives and helps them better understand the mechanisms for exposing corruption schemes.

In addition, a pilot project titled “Ctrl+Справедливість” (“Ctrl+C for Justice”) was launched — a new space for youth who seek to change societal norms. During the event, detectives and experts shared practical experience and discussed the role of the younger generation in transforming anti-corruption culture.

The year 2025 has become a year of systemic development, demonstrated effectiveness, and expanded partnerships for NABU. From successful international evaluations and the implementation of digital tools to work with veterans and students, the National Bureau is confidently building a resilient anti-corruption ecosystem aimed at strengthening public trust and the rule of law.

COOPERATION WITH GOVERNMENT AGENCIES

(FROM 01.01.2025 UNTIL 30.06.2025)

NABU LAWYERS ANALYZED AND PROVIDED CONCLUSIONS REGARDING

53 DRAFT LAWS

15



Verkhovna Rada of Ukraine

1



Ministry of Economy of Ukraine



10



Prosecutor General's Office

2



Ministry of Health of Ukraine



3



Ministry of Internal Affairs of Ukraine

3



Cabinet of Ministers of Ukraine

2



Ministry of Defense of Ukraine

3



National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes

3



National Agency for Corruption Prevention

2



Ministry of Veterans Affairs of Ukraine

4



Ministry of Justice of Ukraine

PUBLIC ACTIVITY (FROM 01.01.2025 UNTIL 30.06.2025)

PUBLIC ACTIVITY



- 99 - responses to media requests
- 49 - comments to media on NABU's work
- 6 - interviews for the national media
- 25 - briefings and press conferences (incl. online)
- 53 - awareness raising events (incl. online)

8801 - number of attendees

REQUESTS TO THE NATIONAL BUREAU (FROM 01.01.2025 UNTIL 30.06.2025)



- 4443 - by mail/email
- 151 - via the public office
- 2629 - via the call center
- 223 - from legal entities and authorities
- 679 - from NGOs
- 377 - public information requests

8502 - TOTAL

COOPERATION WITH GOVERNMENT AGENCIES

(FROM 01.01.2025 UNTIL 30.06.2025)

NABU LAWYERS ANALYZED AND PROVIDED CONCLUSIONS REGARDING: **41** DRAFTS OF SUBORDINATE ACT

6     

Ministry of Health of Ukraine



6     

Ministry of Digital Transformation of



4    

Prosecutor General's Office

3   

Ministry of Veterans Affairs of Ukraine

1 

Ministry of Foreign Affairs of Ukraine

3   

Ministry of Internal Affairs of Ukraine

3   

Ministry of Defense of Ukraine

2  

National Police of Ukraine

2  

National Agency of Ukraine on Civil Service

2  

State Service of Ukraine for Geodesy, Cartography and Cadastre

1 

Ministry for Communities and Territories Development of



Ministry of Justice of Ukraine



General Staff of the Armed Forces



Security Service of Ukraine



Ministry of Culture and Strategic Communications of Ukraine



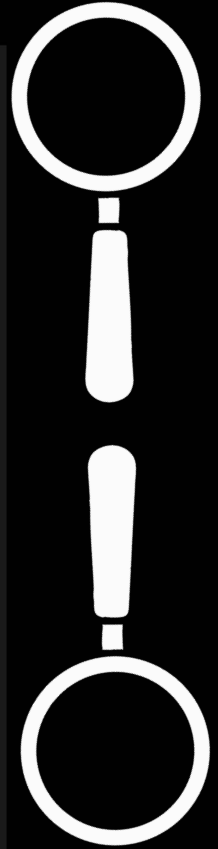
Ministry of Justice of Ukraine



Ministry for Strategic Industries of Ukraine



Administration of the State Service of Special Communications and Information Protection of Ukraine



A large, vertical, yellow-to-white gradient spotlight beam is centered on a black background. The beam originates from a bright yellow oval at the bottom and tapers upwards. The word "CHALLENGES" is written in white, bold, uppercase letters in the center of the beam.

CHALLENGES

NABU CONTINUES TO OPERATE UNDER SIGNIFICANT EXTERNAL PRESSURE AND HIGH PUBLIC DEMAND FOR ANTI-CORRUPTION EFFORTS, MAINTAINING INDEPENDENCE, TRANSPARENCY, AND EFFECTIVENESS REQUIRES OVERCOMING A RANGE OF BOTH INTERNAL AND EXTERNAL CHALLENGES.

These include interference in operations, information attacks, and the need to protect Bureau employees.

Preserving Independence and Strengthening Public Trust

In the face of increasing external pressure and attempts to interfere with its work, safeguarding NABU's independence remains one of today's key challenges. Beyond legislative initiatives that may undermine the Bureau's ability to effectively investigate high-level corruption, NABU must continuously demonstrate its capacity to remain an independent, transparent, and trustworthy institution.

Enhancing Transparency and Communication

Openness and transparency are strategic principles of NABU's work, ensuring public and partner trust. Combating disinformation, manipulation, and reputation attacks requires a systemic strengthening of NABU's communication capacity. Regular, clear, and comprehensive public updates on the progress of investigations and the Bureau's results are an integral part of its operations and a key tool in maintaining public confidence.

Polygraph Examinations

Recent legislative amendments introduced the polygraph as a mandatory element of screening NABU employees for potential ties with the aggressor state. The testing methodology must be agreed upon in coordination with the Security Service of Ukraine. It is critical that this measure is not used as a tool of influence, but rather as part of the integrity assurance system. Moreover, the requirement poses a significant staffing and organizational burden. Conducting a large number of tests requires engaging qualified specialists, modernizing procedures, and enhancing internal capacity to ensure the objectivity and confidentiality of the process.

Documenting Pressure on NABU Employees and Ensuring Their Protection

NABU employees face ongoing unlawful pressure — ranging from surveillance and information gathering to direct physical actions. Recently, there have been incidents involving searches conducted without court orders and the use of physical force against Bureau staff. Such actions are not only illegal but clearly indicate attempts to influence the independence of the anti-corruption body. NABU documents each instance of pressure and takes all possible measures to protect its personnel.



APPENDICES



**SCAN THE QR CODE FOR APPENDICES THAT
CONTAIN STATISTICAL INFORMATION ON
THE NABU AND SAPO WORK IN THE FIRST
HALF OF 2025**



CONTACT THE NATIONAL BUREAU



special phone line:
0-800-213-200

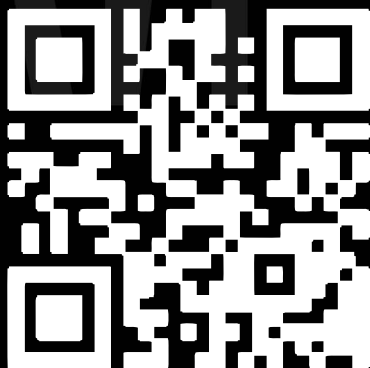


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NATIONAL BUREAU IN SOCIAL NETWORKS





НАБУ