



HIGH-LEVEL SUMMARY TECHNICAL ASSISTANCE REPORT

UKRAINE

Enhancing the Asset Declaration System for
Public Officials

September 2026

Prepared By

Jonathan Pampolina

MEMBERS:

Jonathan Pampolina and Guillaume Valette-Valla

High-Level Summary Technical Assistance Report
Legal Department

Ukraine: Enhancing the Asset Declaration System for Public Officials
Prepared by: Jonathan Pampolina

The *High-Level Summary Technical Assistance Report* series provides high-level summaries of the assistance provided to IMF capacity development recipients, describing the high-level objectives, findings, and recommendations.

ABSTRACT: This technical assistance report evaluates Ukraine's Asset Declaration System (ADS) managed by the National Agency on Corruption Prevention (NACP), focusing on its effectiveness in deterring corruption and verifying public officials' asset declarations. The report finds that while Ukraine's ADS is one of the largest and most advanced globally, it faces significant challenges related to the overwhelming volume of declarations, limited institutional capacity, and gaps in access to critical financial data, especially cross-border information. The adoption of a risk-based approach has improved targeting and detection rates, but structural constraints and legal loopholes remain. Key issues include insufficient inter-agency cooperation, and legislative gaps in lifestyle monitoring and sanctions. To enhance the ADS' effectiveness and sustainability, the report recommends recalibrating the declarant population to focus on verification on high-level and high-risk officials in corruption-vulnerable sectors (e.g., state-owned enterprises, customs and public procurement). Complementary reforms should also strengthen legal frameworks for lifestyle monitoring and sanctions, improve access to foreign financial data, enhance inter-agency cooperation, and shift performance metrics toward impact-oriented indicators to improve the system's deterrence and enforcement capabilities.

JEL Classification Numbers: D73; H83; O17; K42; H11
Keywords: Ukraine, Governance, Corruption, Asset Declaration

The contents of this document constitute a high-level summary of technical advice provided by the staff of the International Monetary Fund (IMF) to the authorities of a member country or international agency (the "CD recipient") in response to their request for capacity development. Unless the CD recipient specifically objects within 30 business days of its transmittal, the IMF will publish this high-level summary on IMF.org (see [Staff Operational Guidance on the Dissemination of Capacity Development Information](#)).

International Monetary Fund, IMF Publications
P.O. Box 92780, Washington, DC 20090, U.S.A.
T. +(1) 202.623.7430 • F. +(1) 202.623.7201
publications@IMF.org
IMF.org/pubs

Background

The Capacity Development (CD) project was initiated at the request of Ukraine’s National Agency on Corruption Prevention (NACP) to support reforms aimed at strengthening the country’s Asset Declaration System (ADS) for public officials. This technical assistance was delivered through two in-person missions conducted in Vienna, Austria on November 5-7, 2025 and January 28-30, 2026 by experts from the IMF Legal Department. The project was embedded within Ukraine’s broader anti-corruption reform agenda, which is a key commitment under the 48-month Extended Fund Facility arrangement approved by the IMF in February 2026.

The ADS is a foundational tool for transparency and anti-corruption efforts, requiring public officials to disclose their assets, liabilities, and interests. Ukraine’s ADS is notable for its scale, complexity, and digital infrastructure, but it faces operational challenges exacerbated by wartime conditions and a large declarant base. The project aimed to assess the effectiveness of the ADS’s verification and lifestyle monitoring frameworks, identify institutional and procedural gaps, and provide a reform roadmap to enhance the system’s impact on preventing, detecting, and prosecuting corruption. The project further examined the institutional architecture underpinning Ukraine’s ADS, focusing on inter-agency cooperation with law enforcement and financial intelligence units and the legal framework governing sanctions and enforcement. These dimensions are critical for ensuring that asset declarations serve not only as transparency instruments but also as effective tools for detecting illicit enrichment and supporting asset recovery.

Summary of Findings

The CD project found that Ukraine’s ADS is an advanced and comprehensive system with significant strengths, including a fully digital and publicly accessible platform interconnected with multiple national databases and a broad legal mandate covering a wide range of public officials. However, the system’s exceptional scale—with approximately 1.7 million registered users and around 700,000 annual declarations—creates an overwhelming volume of data that exceeds the NACP’s verification capacity. The agency’s workforce dedicated to full verification is limited, constraining its ability to thoroughly investigate all high-risk declarations.

Since the restoration of mandatory declarations in October 2023 and the adoption of a risk-based approach, the NACP has improved its targeting and detection rates, with the “hit rate” for identifying violations in full verifications rising. Despite this progress, access to critical financial data remains limited, particularly cross-border tax information under the Common Reporting Standard (CRS), which hampers verification of foreign assets. The current performance framework, which mandates a fixed quota of 1,000 full verifications annually, incentivizes volume over impact and may prioritize minor infractions over serious misconduct involving senior officials.

Lifestyle monitoring (LSM), which assesses whether officials’ living standards align with declared income, is a valuable complementary tool. The legal and procedural frameworks governing LSM require strengthening to ensure constitutional compliance, clear time limits, and effective enforcement. The report highlights that LSM of declarants and full verification (FV) of asset declarations are

institutionally distinct and require differentiated procedural timelines. Imposing rigid deadlines on LSM is counterproductive given its investigative nature linked to officials' mandates and statute of limitations for illicit enrichment.

Inter-agency cooperation between the NACP and other bodies such as the National Anti-Corruption Bureau of Ukraine (NABU), Specialized Anti-Corruption Prosecutor's Office (SAPO), and the State Financial Monitoring Service (SFMS) is critical but currently faces coordination and data-sharing challenges. While cooperation has improved, institutional frictions remain regarding the prioritization and quality of investigative materials. The NACP acts as an early-warning and evidence-generation body, but converting administrative findings into prosecution-ready cases requires better integration and feedback loops with law enforcement. Access to tax data and banking information is limited by the absence of a Unified Register of Bank Accounts and restricted access to primary financial monitoring data collected under anti-money laundering obligations, weakening cross-verification capabilities.

The report also identifies significant legislative and operational gaps in sanctions and enforcement frameworks. The current complex system of monetary thresholds and liability types leads to misinterpretation, conflating administrative errors with criminal conduct, and complicates judicial processes. The statute of limitations for civil confiscation is too short, undermining asset recovery efforts, especially given the latent nature of illicit enrichment. The report notes the need for reforms to simplify sanctions, introduce recidivism-based criminal thresholds, and aligning limitation periods with comparative practices across European Union member states.

Summary of Recommendations

To enhance the effectiveness and sustainability of Ukraine's ADS, the report recommends a strategic recalibration of the declarant population to focus verification resources on high-level and high-risk officials, particularly in sectors vulnerable to corruption such as state-owned enterprises, customs, and public procurement. Legislative amendments should narrow the scope of mandatory declarations or differentiate between transparency-focused declarations and those subject to active NACP oversight. Closing legal loopholes, especially regarding managers of state-owned enterprises and aligning politically exposed persons definitions with anti-money laundering frameworks, is essential.

Improving institutional capacity for its risk-based approach is paramount. The NACP should receive adequate and predictable budgetary support to ensure competitive remuneration and strengthen its specialized verification and lifestyle monitoring teams. The agency should refine its risk-based verification algorithms and adopt impact-oriented key performance indicators that prioritize detection effectiveness, referral quality, and asset recovery outcomes over fixed quotas. To increase transparency and build trust, an independent Technical Audit Working Group composed of external experts should be established to confidentially review verification methodologies and algorithms.

Access to foreign financial data (including under the CRS) must be legally authorized and operationalized, with clear safeguards to protect confidentiality and enhance cooperation with financial intelligence and tax authorities. Legislative reforms should empower the SFMS to disseminate financial intelligence to the NACP, facilitating spontaneous data sharing through international networks. Introducing a legal presumption that undeclared wealth constitutes potential tax evasion or money laundering would strengthen referral pathways and evidentiary foundations for enforcement.

The LSM legal framework should be strengthened by establishing flexible, mandate-linked procedural timelines, ensuring constitutional privacy protections, and extending monitoring jurisdiction beyond officials' terms of service to capture deferred illicit enrichment. Inter-agency cooperation mechanisms should be reinforced to facilitate timely information exchange and coordinated enforcement actions, including formalizing partnerships with NABU, SAPO, SFMS, and the Asset Recovery and Management Agency, and expanding international cooperation for cross-border asset detection.

Sanctions should be simplified by adopting a graduated liability framework that distinguishes administrative errors from criminal intent through recidivism-based criminal thresholds. Monetary thresholds for criminal offenses should be rationalized to enhance legal predictability and focus enforcement on significant cases. Aligning statutes of limitations with comparative practices across European Union member states, including suspending civil limitation periods during active criminal proceedings, is critical to prevent evasion of asset recovery.

Collectively, these reforms aim to transform Ukraine's ADS from a volume-driven administrative exercise into a strategic, impact-oriented integrity framework that effectively deters corruption, supports asset recovery, and aligns with international best practices, thereby reinforcing Ukraine's broader anti-corruption commitments under challenging wartime conditions.