

# DONOR ROADMAP: SEQUENCING INTEGRITY INTERVENTIONS FOR IMPACT IN UKRAINE'S RECONSTRUCTION

## CONTEXT AND STARTING CONDITIONS FOR DONOR ENGAGEMENT

The report [Leveraging Integrity for Ukraine's Reconstruction: The Role of Ethical Businesses](#) identifies several **structural realities** that should inform donor strategies to strengthen business integrity and anti-corruption outcomes in Ukraine's reconstruction context.

First, the findings demonstrate a **high level of business willingness** to engage in integrity-driven reforms and collective anti-corruption action. Nearly 88 percent of surveyed companies report being willing or very willing to participate in collective initiatives addressing corruption risks during reconstruction. This constitutes a critical enabling factor for donor-supported interventions, as it indicates that resistance from the private sector is not the primary constraint to progress.

Second, the integrity landscape is characterised by **uneven capacity and maturity**. While a core group of "champion" companies has already developed advanced integrity, compliance, and risk-management systems, a substantial share of enterprises continues to operate with basic, fragmented, or underdeveloped arrangements. This divergence implies that compliance-heavy or blanket approaches risk reinforcing existing gaps rather than lifting overall system maturity across the market.

Third, the report clearly identifies the **most actionable and practical levers of influence** available in the current environment. These include (i) capacity-building measures such as

(ii) digital and procedural tools that support transparency, due diligence, and internal controls; (iii) support channelled through business associations and professional networks; and (iv) donor instruments such as grants, technical assistance, pilot projects, and cost-sharing mechanisms.

At the same time, the report highlights that the **least controllable variables in the short term** are comprehensive judicial reform and the impartial, accountable and rights-respecting exercise of regulatory and enforcement authority. These reforms remain essential for long-term sustainability, although they are mainly beyond donors' direct control and cannot be assumed as preconditions for immediate programme success. A dual strategy that focuses on short-term interventions to strengthen private companies' capacity to act ethically and contribute to expanding business integrity and long-term rule of law reforms is, however, important. These two approaches need to be pursued concomitantly and interventions targeting companies can inform, support and reinforce legal and institutional reform.

Taken together, these conditions indicate that a practical donor roadmap should **begin with interventions fully within donor influence**, strengthening enterprise-level capacity, incentives, and collective norms, and subsequently contribute to broader systemic change through demonstration effects, coalition-building, and gradual pressure on institutional practices.

## Criteria for Selecting Recommendations for the Roadmap

The recommendations prioritised in this roadmap have been selected based on their **feasibility, leverage, and relevance under current Ukrainian conditions**. Specifically, the roadmap focuses on recommendations that:

- do not require immediate legislative or constitutional change for implementation;
- can be operationalised directly by donors, in close cooperation with non-profit organizations, business associations, chambers of commerce, and professional networks;
- offer a rapid demonstration effect, with tangible and visible results achievable within a 6–18 month timeframe.

This selection logic reflects the need for donor interventions to deliver early credibility, build trust among businesses, and generate momentum for deeper reforms, while avoiding overreliance on slower-moving institutional transformations.

Based on these criteria, the roadmap prioritises the following recommendations from the report: Recommendation 1 (integrity narrative and awareness-raising); Recommendation 7 (financial support for compliance and integrity systems); Recommendation 8 (technical, legal, and advisory assistance); Recommendation 9 (recognition and visibility for ethical companies); Recommendation 10 (integrity-focused events and practical guidance); Recommendation 11 (business integrity pledges and sectoral collective action); Recommendation 12 (co-creation, pilots, and in-kind contributions); and Recommendation 13 (joint monitoring and reporting mechanisms).

Together, these recommendations form a **coherent intervention cluster** that enables donors to move progressively from awareness-raising and capacity-building toward collective action and market-level impact, while remaining grounded in what is realistically implementable in the near and medium term.

## Guiding Principles for Donor Engagement

Four overarching principles should guide the implementation of the roadmap.

First, **sequencing matters**. Early-stage interventions should reduce reputational, financial, and operational risks for ethical businesses before advancing toward more demanding collective or monitoring mechanisms.

Second, **capacity should precede conditionality**. Enterprises must be enabled to comply through access to skills, tools, and financing before higher integrity expectations are imposed through procurement, pledges, or monitoring requirements.

Third, **collective action is essential to level the playing field**. Individual integrity efforts are most sustainable when reinforced by sector-wide commitments and shared standards that reduce first-mover disadvantages.

Fourth, **demonstration and visibility are critical**. Peer learning, practical examples, and recognition mechanisms play a central role in shifting business norms and embedding integrity as a professional standard rather than a donor-driven obligation.

## Phase I: Normalising Business Integrity and Creating Early Momentum

**Time horizon:** 0–12 months

### *Strategic Objective*

To dismantle entrenched perceptions that business integrity constrains commercial success and to establish integrity as a **mainstream, value-generating business norm** across priority sectors.

### *Priority Recommendations*

Recommendations 1 (integrity narrative and awareness-raising), 9 (recognition and visibility for ethical companies), and 10 (integrity-focused events and practical guidance).

### *Donor-Supported Interventions*

During this phase, donors should support awareness-raising campaigns and sector-specific communication materials that demonstrate the tangible business benefits of integrity, drawing on empirical evidence and real-life company experiences. These campaigns could also include recognition and visibility mechanisms for ethical companies, including awards, public listings, ratings, and promotion through events and media channels. Campaigns like [Integrity Icon](#) provide ideas. Donors could co-host integrity-focused events with business associations and chambers of commerce to disseminate practical knowledge, foster peer exchange, and reinforce positive norms.

Practical guidance products such as toolkits, step-by-step compliance guides, and model policies, should also be developed for sectors central to reconstruction and characterised by elevated corruption risks.

### *Expected Results*

This phase is expected to reduce stigma associated with ethical business conduct, strengthen leadership commitment to integrity, and stimulate demand for practical

compliance tools and assistance. Ethical enterprises become more visible and credible as partners for donors, investors, and public authorities, creating a foundation for deeper institutional investment.

## Phase II: Building Enterprise-Level Integrity Capacity

**Time horizon:** 12–30 months

### *Strategic Objective*

To translate integrity awareness into **operational capability** by reducing financial, technical, and skills-related barriers to implementing compliance, risk-management, and internal control systems.

### *Priority Recommendations*

Recommendations 7 (financial support for compliance and integrity systems), 8 (technical, legal, and advisory assistance), and 12 (co-creation, pilots, and in-kind contributions).

### *Donor-Supported Interventions*

Donors should provide targeted financial support—through grants, matching funds, or cost-sharing schemes—for enterprises seeking to develop or upgrade integrity and compliance systems. This support should include access to digital compliance tools such as due diligence and sanctions screening platforms, whistleblowing mechanisms, and electronic document management systems.

In addition, donors should support structured training and certification programmes in compliance, risk management, and internal audit, including train-the-trainer models that leverage expertise from ethically advanced enterprises. Also, mentorship and twinning arrangements between Ukrainian companies and multinational or foreign firms would be useful in facilitating the transfer of applied knowledge.

In parallel, donors should fund pilot initiatives, co-creation labs, and proof-of-concept projects to test sector-specific compliance solutions and adapt international standards to local operational realities.

### *Expected Results*

This phase should result in a critical mass of enterprises with functioning and proportionate integrity systems, lower compliance costs—particularly for SMEs and municipal or state-owned enterprises—and the emergence of a domestic market for integrity-related professional services. Integrity maturity gaps across sectors and company sizes are expected to narrow significantly.

## Phase III: Scaling Impact through Collective Action and Oversight

**Time horizon:** 24–48 months

### *Strategic Objective*

To institutionalise integrity through **sector-wide collective mechanisms** that protect ethical companies, reduce corruption risks in reconstruction, and strengthen donor assurance.

### *Priority Recommendations*

Recommendations 11 (business integrity pledges and sectoral collective action) and 13 (joint monitoring and reporting mechanisms).

### *Donor-Supported Interventions*

Donors should support the development and collective adoption of donor-endorsed Business Integrity Pledges for Reconstruction, particularly in high-risk sectors such as construction, energy, and logistics. They should provide seed funding and technical assistance to establish and sustain sectoral integrity platforms and working groups.

Donors could additionally promote and fund joint monitoring and reporting mechanisms for reconstruction contracts, engaging business professionals as independent contributors to oversight, evaluation, and quality assurance. This could include inter-regional and anonymous monitoring models in order to mitigate risks associated with local capture and informal networks.

### *Expected Results*

Collective action mechanisms are expected to reduce first-mover disadvantages for ethical companies, improve transparency and accountability in donor-funded reconstruction projects, and lower fiduciary and reputational risks for donors. Over time, integrity becomes embedded as a **shared market standard** rather than an individual company attribute.

## Overall Change Logic

The roadmap follows a cumulative change logic:

### **Narrative and visibility → Capacity and systems → Collective enforcement**

Early communication and recognition efforts build demand and legitimacy for integrity. Targeted financial and technical support enables companies to operationalise compliance. Collective action and monitoring mechanisms then consolidate gains and protect ethical behaviour at scale.

### **Relevance to the Current Ukrainian Context**

The roadmap is designed to be implementable under current conditions, without reliance on immediate, comprehensive rule-of-law or judicial reforms. By leveraging high business readiness, existing associations, and donor-controlled instruments, the roadmap delivers measurable impact in the short and medium term while contributing indirectly to longer-term governance improvements through strengthened constituencies for integrity, predictability, and fair competition.

### **Cross-cutting Themes and Scaling**

A multi-pronged strategy to ensure reconstruction and recovery with integrity is essential. Successful implementation of the suggested phases would provide proof of concept and a strong foundation for scaling interventions. Donors should also consider supporting similar surveys of additional companies and in-depth mapping of specific sectors. This will help raise awareness, expand knowledge and capacity, and increase collaboration between various business associations.

Finally, donors should also consider supporting joint initiatives with civil society organizations at both national and local levels to continue to advance the necessary rule of law reforms, transparency and accountability that create an enabling environment—and a push factor—for ethical business conduct.

