

LEVERAGING INTEGRITY FOR UKRAINE'S RECONSTRUCTION: THE ROLE OF ETHICAL BUSINESSES

The report provides an evidence-based assessment of how Ukrainian businesses are advancing integrity and corporate compliance practices during conflict. By highlighting concrete patterns, sectoral dynamics, and the voices of ethical companies, the report by Accountability Lab and the Corporate Governance Professional Association (CPGA) Ukraine, aims to support a post-war reconstruction process in which business integrity is strategically leveraged to build a more transparent and resilient Ukrainian economy.

EXECUTIVE SUMMARY

The report identifies key drivers of business integrity maturity, major operational constraints, and emerging opportunities for collective action initiatives to prevent corruption during reconstruction.

The analysis offers insight into which integrity measures deliver the highest value for companies, where capacity gaps persist, and what types of external support are most urgently needed. It demonstrates advanced integrity

practices on the part of some companies. However, it also points to many companies that remain at an early developmental stage – highlighting both progress made and the need for targeted support to raise overall system maturity across the sample. The findings suggest that integrity maturity is driven primarily by internal governance arrangements, leadership commitment, and organisational culture rather than by a company's legal form, economic size, or age.

For consideration by three key stakeholder groups – donors, Ukrainian public authorities, and the Ukrainian business community – this report sets out 13 recommendations grouped according to their primary focus:

- strengthening the enabling environment for ethical business practices (recommendations 1-6),
- mainstreaming business integrity frameworks (recommendations 7-10), and
- supporting collective action initiatives and monitoring mechanisms to prevent corruption during reconstruction (recommendations 11-13).

RECOMMENDATIONS

- 1** Promote a consistent narrative that business integrity delivers tangible benefits for economic entities. Activities and events - such as awareness-raising campaigns and training initiatives - organised by business associations and donors should target both the general public and the business community.

This narrative should refer to the findings of this report, showing that business integrity commitments, corporate compliance, and anti-corruption instruments are considered useful for business operations by 90% of survey respondents, and that in most cases such practices

do not constrain business opportunities (63%). To reinforce this narrative, develop communication materials featuring sector-specific case studies, success stories, and field-based experiences, as well as lessons learned.

2 Advance efforts to strengthen the exercise of rule-of-law principles in public administration. For this purpose:

2.1. Ensure that public authorities – including, but not limited to, tax authorities, the National Energy and Public Utilities Regulatory Commission, their regional offices, and local authorities – exercise administrative powers in a rights-respecting manner and refrain from any form of degrading treatment of economic entities. It is recommended to reform procedural regulations and communication standards by revising procedural rules governing asset seizure, fines, and other penalties to ensure proportionality, transparency, and predictability, and by introducing mandatory communication protocols for public officials aimed at reducing arbitrary behaviour, degrading treatment, and harassment of businesses.

2.2. Finalize and operationalize judicial reform to ensure fair market competition, strengthen investor protection, credibly deter regulatory arbitrariness and impunity, and provide predictable and effective dispute resolution for businesses. In parallel, accelerate reforms aimed at enhancing the competence, independence, and integrity of judges handling commercial and administrative disputes.

3 Ensure the Business Ombudsman Council and the Anti-Monopoly Committee have sufficient mandates, operational independence and impartiality, and adequate resources to carry out their functions.

4 Support capacity-building for public authorities by providing targeted technical assistance including but not limited to, tax authorities, the National Energy and Public Utilities Regulatory Commission, their regional offices, and local authorities to strengthen rule-of-law implementation practices, procedural safeguards, communication standards with businesses, and oversight mechanisms preventing regulatory abuse and degrading treatment. Contribute to the judicial reform and rule-of-law agenda by supporting the institutional transformation of courts, disciplinary bodies, and judicial training centers, as well as by funding monitoring tools to track improvements in judicial performance and business dispute resolution.

5 Advance efforts to institutionalize democratic inclusiveness in business engagement in policymaking consultation processes, while ensuring that businesses have adequate and meaningful avenues to participate and public officials demonstrate responsiveness and

and integrity in these interactions. For this purpose:

5.1. Enhance the responsiveness and accountability of public officials in consultation processes by introducing standards requiring officials to respond to business inputs and publish explanatory notes on how comments from consultations influence final regulations.

5.2. Support regular training in stakeholder engagement and open government practices. The National Agency on Civil Service can play a key role by establishing mandatory training modules on stakeholder engagement and open government practices as part of regular professional development and upskilling programmes for public officials.

5.3. Promote the visible demonstration of integrity commitments by public officials by developing communication and behavioral standards that require officials to model integrity in their interactions with businesses, and by publicly communicating examples of integrity-driven decision-making in order to build trust.

5.4. Expand and diversify avenues for business participation by introducing multiple channels for input – including digital consultations, online feedback tools, structured calls for comments, and workshops.

6 Encourage ad hoc business consultations with public officials in the form of fora and roundtables. Such consultations should enable businesses to proactively invite open dialogue with public authorities to discuss pressing issues and inform policy adjustments, rather than waiting for public authorities to initiate formal consultation processes.

7 Provide enterprises – particularly municipal and state-owned enterprises – with targeted financial support for the development or upgrading of corporate compliance and business integrity systems, including certification, and access to analytical systems (mentioned in sub-section 2.1) through grant schemes, matching funds, or cost-sharing mechanisms. Such support should cover, inter alia, training programmes and access to digital tools, including compliance and risk-management platforms, electronic document management systems, due-diligence and risk-screening software, and secure internal reporting channels.

In the context of donor-funded reconstruction projects, additional financial incentives should be introduced through integrity-based procurement mechanisms, including loan guarantees and other risk-mitigation instruments, to encourage sustained investment in business integrity and compliance systems.

8 Provide technical and legal assistance by offering legal advisory support for risk assessments, due diligence, and internal control systems, as well as tailored guidance for

that lack in-house expertise. For this purpose:

8.1. Promote mentorship and advisory partnerships with multinational companies, including the facilitation of twinning models between Ukrainian enterprises and multinational firms, the establishment of structured mentorship programmes, and the development of sector-specific advisory partnerships.

8.2. Strengthen knowledge-sharing networks and regional peer-learning through the establishment of business integrity and corporate compliance communities, the organization of regional knowledge-exchange and experience-sharing events, and the connection of Ukrainian enterprises to international integrity networks.

8.3. Enable 'champion companies' to contribute expertise and good practices more systematically by supporting platforms for presenting case studies, developing business integrity and corporate compliance 'marketplaces' where companies can exchange tools and solutions; and introducing incentives for enterprises to document and disseminate examples of effective practice.

9 Enhance recognition and visibility for ethical companies by developing donor-supported recognition schemes, and promoting champions through conferences, events, ratings, and media visibility.

10 Support business integrity-focused events by co-hosting activities with business associations and chambers of commerce, sponsoring regular sector dialogues and thematic initiatives, and producing and disseminating practical guidance materials. These should include sector-specific toolkits, step-by-step compliance guidance, bulletins, and online repositories of templates, tools, and model policies.

11 Promote business integrity pledges by developing a donor-endorsed Business Integrity Pledge for Reconstruction and facilitating its collective adoption in high-risk sectors, such as construction and energy. This should be complemented by the establishment of sectoral working groups focused on high-risk areas, supported by technical expertise and international benchmarks. To ensure sustainability, provide seed funding to support collective-action infrastructure by offering grants and other forms of financial and operational support for the coordination and long-term functioning of collective-action initiatives.

12 Encourage in-kind contributions and the co-production of solutions by establishing

co-creation labs and engaging company compliance teams in donor-funded pilot initiatives. This may include experimental pilot programmes to test new compliance tools, sector-specific business integrity pilots, and collaborative public-private proof-of-concept platforms.

- 13** Support joint monitoring and reporting mechanisms by funding their establishment and operation for reconstruction contracts. This should include the engagement of business professionals to contribute to scrutiny, monitoring, and advisory functions within monitoring and evaluation processes.

“Widespread willingness among companies to participate in collective anti-corruption initiatives underscores significant momentum for scaling reform-driven, multi-stakeholder efforts during Ukraine’s post-war reconstruction”

