July 2026

Corruption Risks when Participating in the Economic Recovery of Ukraine and How to Address Them

A Framework for Public and Private Entities

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Note: In preparing this document, AI was used as a support tool on a selective basis to assist with research and translation tasks. The resulting output was reviewed and independently assessed by the authors.

B. INTRODUCTION AND BACKGROUND

The ongoing war of aggression by Russia against Ukraine has resulted in widespread human, economic, and infrastructural devastation. Critical assets, including residential housing, transportation networks, energy systems, and public services, have been severely damaged or destroyed. Beyond the immediate humanitarian consequences, the destruction has significantly impaired Ukraine's economic capacity and unsettled its institutional functioning, creating an urgent and large-scale need for coordinated recovery and reconstruction efforts.

Rebuilding Ukraine requires more than restoring pre-war conditions. It entails a comprehensive reconstruction of infrastructure and public systems in line with the principle of "building back better" – enhancing resilience, transparency, and sustainability. According to estimates by the World Bank, the total cost of reconstruction amounts to approximately USD 588 billion over the next decade.[1] This figure represents nearly three times Ukraine's projected 2025 gross domestic product, underscoring the unprecedented scale of financial resources that must be mobilized and effectively managed over a sustained period.

The scale and complexity of reconstruction necessitate the involvement of a broad range of stakeholders. International organizations such as the United Nations (UN), the Organization for Economic Co-operation and Development (OECD), and the European Union (EU) play a central role in shaping policy frameworks, coordinating donor efforts, and providing financial and technical assistance. At the same time, private sector participation is indispensable. Public, private, and hybrid investment flows are essential to finance reconstruction, stimulate economic recovery, restore public services, and lay the foundation for long-term growth and stability.

While the past has been marked by several corruption controversies, Ukraine's overall corruption climate is not straightforward. Still, the extraordinary scale of funding and the urgency of disbursement tends to create a high-risk environment for corruption, fraud, and governance failures. Large inflows of capital, combined with complex procurement processes and varying institutional capacities, increase the likelihood of misuse of funds, conflicts of interest, and inefficiencies. These risks are not merely theoretical; they have direct implications for the success of reconstruction efforts. Corruption and weak governance can significantly undermine the effectiveness of investments, erode public trust, and deter both domestic and international investors.

Investor confidence is particularly sensitive to perceived integrity risks. Where transparency and accountability mechanisms are insufficient, the willingness of private and public actors to commit capital diminishes. This effect is reinforced by the personal liability exposure of management board members: under applicable corporate and criminal law frameworks, directors and officers who approve investments in high-risk environments without adequate compliance safeguards may face individual legal consequences – including criminal prosecution, civil damages claims and regulatory sanctions. In practice, this risk of personal liability creates a significant deterrent, as management boards may refrain from pursuing investment decisions altogether rather than exposing themselves or their organizations to potential enforcement action. This creates a tension: while foreign investment is essential to Ukraine's recovery, the very conditions of large-scale reconstruction heighten the risks that

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[1] "Updated Ukraine Recovery and Reconstruction Needs Assessment Released," World Bank Group (February 23, 2025) https://www.worldbank.org/en/news/press-release/2026/02/23/updated-ukraine-recovery-and-reconstruction-needs-assessment-released

may discourage such investment. Addressing this tension demands a robust and credible anti-corruption and compliance framework that can operate effectively in practice.

One of the central challenges facing the compliance landscape is the persistent gap between the law as it exists on paper and the law as it is applied in practice. Among other, donor countries, international financial institutions, and both international and Ukrainian legal frameworks impose a wide range of anti-corruption, transparency, and reporting requirements – with the fragmentation and complexity of these frameworks often undermining their practical effectiveness. Requirements are frequently uncoordinated and overlapping, resulting in duplication, inefficiencies, and increased administrative burdens – but more critically, this lack of harmonization creates conditions in which compliance gaps emerge because of inadvertently created gaps in oversight.

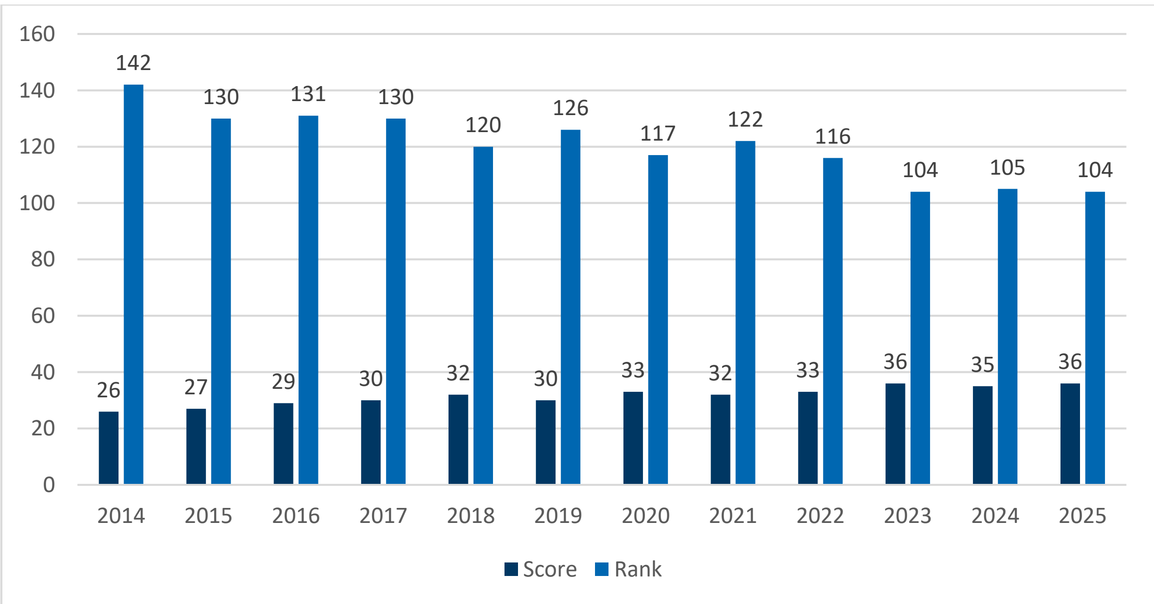
Against this backdrop, there is a strong need for a comprehensive and operational integrity framework that consolidates and translates these diverse requirements into a coherent system. Such a framework must go beyond formal legal compliance to provide practical tools for risk identification, mitigation, monitoring, and enforcement across the full lifecycle of reconstruction projects. By ensuring transparency, accountability, and governance, it enhances the efficiency of investments, builds investor confidence, and ultimately supports the objective of an integral, resilient, and sustainable recovery in Ukraine.

C. ANTI-CORRUPTION LANDSCAPE IN UKRAINE

I. Corruption Risk Profile of Ukraine

Ukraine generally presents a high level of corruption risk. This is reflected in the Corruption Perceptions Index (CPI) published by Transparency International, which is widely regarded as the most prominent global indicator of corruption.[2] Between 2014 and 2024, Ukraine received scores between 26 and 35 which ranked the country worldwide between ranks 142 and 105. In 2025 Ukraine scored 36, bringing its ranking to 104 – though this marginal improvement can be seen as more stagnation than real development.

Figure 1: Corruption Perceptions Index 2014 - 2025



[2] "Corruption Perceptions Index," Transparency International https://www.transparency.org/en/cpi/2025

Ukraine's reconstruction effort is taking place against a backdrop of longstanding corruption concerns and heightened investor scrutiny.[3] Corruption risks are not limited to isolated incidents but have historically been associated with procurement, public contracting and interactions between political and economic actors.[4,5] The scale of reconstruction funding, combined with complex delivery arrangements and varying institutional capacity, creates conditions in which conflicts of interest, misuse of funds and weak oversight can undermine project outcomes and investor confidence. As a result, robust governance, transparency and accountability mechanisms remain critical considerations for organizations participating in reconstruction activities.

II. Efforts by the Ukrainian Government to Address Corruption Risks

In recent years, Ukraine has taken significant steps to strengthen its anti-corruption framework, in particular in response to requirements set by the International Monetary Fund and in the context of its EU accession ambitions.[6]

Ukraine has established a dedicated anti-corruption architecture that combines investigative, prosecutorial, judicial, prevention and asset-recovery functions. These institutions form a central component of the country's governance reform agenda and demonstrate a sustained commitment to strengthening anti-corruption enforcement.[7]

Beyond institutional reforms, Ukraine has adopted a broader program of governance, judicial and anti-corruption reforms linked to economic recovery and EU integration, as detailed in the Ukraine Plan.[8] These reforms seek to strengthen institutional capacity, improve enforcement effectiveness and enhance transparency across public administration and public spending.

III. EU Oversight in the EU Accession Process

A positive factor in assessing Ukraine's anti-corruption landscape is the close monitoring exercised by the EU in the context of the accession process. The EU-Ukraine Report of the European Commission constitutes a central instrument of this monitoring, providing regular assessments of Ukraine's progress in aligning its legal and institutional framework with EU standards, including in the field of anti-corruption.[9]

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[3] "OECD Integrity and Anti-Corruption Review of Ukraine," OECD (May 6, 2025) https://www.oecd.org/en/publications/oecd-integrity-and-anti-corruption-review-of-ukraine_7dbe965b-en.html

[4] "Public Procurement 2023: Functioning of the Field and Changes to It," Transparency International/DOROZZO (2024) https://ti-ukraine.org/wp-content/uploads/2024/05/Public-Procurement-2023-v3p.pdf

[5] "Progress in Ukraine's anti-corruption and judicial reform efforts," June 2024 https://baselgovernance.org/sites/default/files/2024-06/240610%20Ukraine%20anticorruption%20update_digital.pdf

[6] "Ukraine: Request for an Extended Arrangement Under the Extended Fund Facility," International Monetary Fund (March 31, 2023) https://www.imf.org/en/publications/cr/issues/2023/03/31/ukraine-request-for-an-extended-arrangement-under-the-extended-fund-facility-and-review-of-531687

[7] The Specialized Anti-Corruption Prosecutor's Office (SAPO); The National Anti-Corruption Bureau of Ukraine (NABU); The National Agency for Corruption Prevention (NACP); High Anti-Corruption Court (HACC) and Asset Recovery and Management Agency (ARMA)

[8] "Ukraine Plan 2024 – 2027," Government of Ukraine (March 20, 2024) https://www.ukrainefacility.me.gov.ua/wp-content/uploads/2024/03/ukraine-facility-plan.pdf

[9] "Ukraine Report 2025," European Commission (November 4, 2025) https://enlargement.ec.europa.eu/ukraine-report-2025_en

This external oversight contributes to the stability of reform efforts by linking political and financial incentives, such as progress in accession negotiations and access to funding, to measurable developments in anti-corruption policy. In addition, it creates a framework of accountability that limits the scope for political interference with key institutions.

However, while Ukraine has established key institutional structures and remains subject to close external oversight, progress in implementing reforms is regarded as limited, and recent developments have raised concerns about the sustainability of anti-corruption efforts.

D. WHERE DOES UKRAINE STAND IN RELATION TO EU AND INTERNATIONAL ANTI-CORRUPTION BENCHMARKS?

Ukraine's anti-corruption framework should be assessed not only against domestic requirements, but also against the expectations of international investors, lenders and donors. These expectations are increasingly shaped by EU and international anti-corruption standards, which emphasize transparency, accountability, enforcement and effective governance. These standards include the Anti-Corruption Directive (EU) 2025/1226, the UK Bribery Act and the U.S. Foreign Corrupt Practices Act (FCPA) remains a key benchmark for international investors due to its extra-territorial reach and focus on anti-bribery controls and internal compliance systems.

Overall, Ukraine's anti-corruption framework largely meets international benchmarks at the level of formal legislation and institutional design. However, persistent deficiencies in enforcement, institutional independence and the practical application of legal standards continue to undermine its effectiveness. At the same time, continuous monitoring and conditionality exercised by the EU have proven effective in safeguarding key elements of the framework and preventing backsliding and are expected to remain a central driver of further reforms. Consequently, the key challenge lies not in the legal framework itself, but in ensuring its consistent implementation and resilience against political interference.

E. CORRUPTION RELATED RISKS WHEN PARTICIPATING IN THE ECONOMIC RECOVERY OF UKRAINE

I. Legal Risks Associated with Corruptive Practices

Participation in Ukraine's economic recovery presents significant opportunities for investors but also exposes them to significant corruption-related legal risks under both their domestic laws and Ukrainian law. Under German criminal law, for example, liability arises for bribery in both the private and public sectors with potential extraterritorial application, and extends to ancillary offences such as fraud, embezzlement, money laundering, subsidy fraud and tax evasion. At the corporate level, companies may face severe administrative fines for corruption-related offences committed by senior personnel or resulting from organizational failures, confiscation of the proceeds derived from corruptly obtained contracts, as well as civil liability claims and injunctive relief brought by disadvantaged competitors under competition law. Further consequences include mandatory repayment of misused public funds, and exclusion from future public procurement tenders at both national and EU level. Inversely, Ukrainian law also imposes criminal liability for corruption offences, meaning that investor conduct may simultaneously attract scrutiny under multiple legal regimes.[10]

[10] This includes Sections 299, 333, 334, 335a, 3, 7, 9, 73 et seq., 261, 263, 264, 266 and 267 et seq. of the German Criminal Code (*Strafgesetzbuch* – StGB); Sections 30 and 130 of the German Act on Regulatory

II. Associated Economic, Political and Reputational Risks

At a time when the international community is closely scrutinizing the integrity of recovery efforts, any credible allegation that EU investors – whether state-affiliated or private – have channeled funds into bribes or corrupt arrangements would inflict severe and potentially irreparable reputational damage and significant political ramifications. From a purely economic perspective, the financial cost of corruption-related controversies is likely to dwarf any advantage initially sought, including fines, asset confiscation, subsidy repayment obligations, and civil damages claims as well as loss of future business opportunities across the entire region.

German companies and investors should therefore implement robust anti-corruption compliance frameworks specifically calibrated to the Ukrainian operating environment, including employee training, clear gift and hospitality policies, due diligence on local partners, reliable documentation of all payments, including facilitation payments.

F. POTENTIAL EXPOSURE TO CORRUPTIVE PRACTICES AND RELATED RISKS IN CONNECTION WITH EXTERNAL INVESTMENTS

Investing in reconstruction projects in Ukraine entails significant corruption risk. While overarching patterns of illicit behavior pertain, the way those risks materialize depends on whether private or public entities are funding, implementing or overseeing the project.

Figure 2: Lifecycle Risk Framework

STEP 1 PRE-CONTRACTING	STEP 2 CONTRACTING	STEP 3 EXECUTION	STEP 4 MONITORING
• Cost inflation	• Award manipulation	• Contract non-compliance	• Ineffective audit coverage
• Manipulated needs assessments	• Undisclosed interests	• Unjustified amendments	• Oversight interference
• Opaque ownership	• Weak contract design	• Document fraud	• Weak remediation tracking
• Conflicts of interest	• Inadequate integrity clauses	• Overbilling	• Information asymmetries
• Procurement manipulation	• Reduced counterparty transparency	• Fund diversion	• Reduced accountability

I. Pre-Contracting Phase

The pre-contracting phase is particularly vulnerable to manipulation because it establishes the project baseline, procurement framework and economic assumptions that shape subsequent decision-making. Key risks include inflated damage assessments, inflated reconstruction costs, manipulated selection criteria, conflicts of interest, opaque ownership structures and third-party integrity failures, each of which may distort investment decisions,

Offences (*Ordnungswidrigkeitengesetz* – OWiG); Sections 8 and 9 of the German Act Against Unfair Competition (*Gesetz gegen den unlauteren Wettbewerb* – UWG); and relevant provisions of the Criminal Code of Ukraine.

limit competition or channel funds toward inappropriate beneficiaries. Public procurement processes may also be exposed to collusion and market manipulation.

II. Contracting Phase

During contracting, corruption risks arise where contract awards, negotiations or contract terms are influenced by undisclosed interests, favoritism or improper incentives. Key risks include manipulation of selection and award decisions, inadequate contractual safeguards, opaque ownership structures and conflicts of interest that distort commercial outcomes or reduce transparency and accountability.

III. Contract Execution and Management Phase

During execution, corruption risks shift from the allocation of contracts to project delivery and fund utilization. Key risks include non-adherence to contractual obligations, unjustified contract amendments, document fraud, overbilling, misuse or diversion of funds, undisclosed conflicts of interest and inappropriate political or commercial influence over project implementation.

IV. Monitoring and Oversight Phase

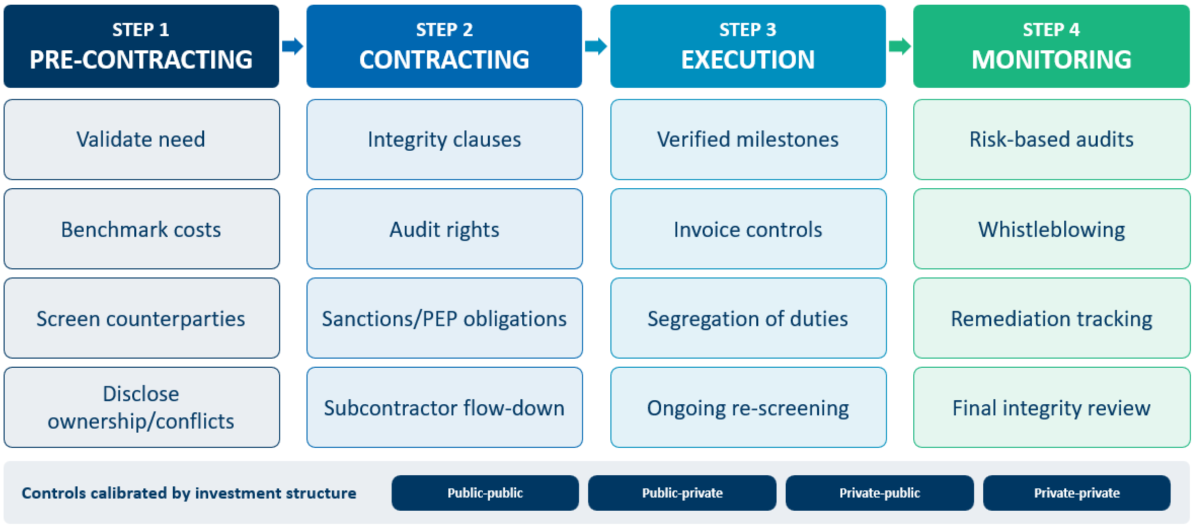
Effective monitoring and oversight remain essential throughout the project lifecycle. Key risks include incomplete or ineffective oversight, interference with audit activities, failures to implement remediation measures and information asymmetries that may conceal misconduct, reduce accountability and undermine confidence in project outcomes.

G. HOW TO ADDRESS RISKS ASSOCIATED WITH CORRUPTIVE PRACTICES

Establishing comprehensive compliance frameworks, including compliance management systems (CMS), structured business partner due diligence, documentation and verification mechanisms, as well as whistleblowing arrangements, are widely regarded as "best practice".[11] These instruments are designed to prevent, detect and mitigate legal risks such as corruption risks and to ensure the effective implementation of compliance standards across business operations and third-party relationships.

Figure 3: Risk-Based Integrity Controls Across the Reconstruction Lifecycle

[11] German Corporate Governance Code (Deutscher Corporate Governance Kodex); ICC Guidelines on Agents, Intermediaries and Other Third Parties; and ISO 37001:2025, Anti-Bribery Management Systems – Requirements with Guidance for Use.



I. Pre-Contracting Phase

1. Inflation or Manipulation of Damage and Needs Assessments

The central response to the risk of inflated or manipulated damage and needs assessments is the independent validation of cost estimates and technical baselines, via benchmarking, as well as increasing the transparency of the assessment and determination process.

In **public investment settings**, public access to assessment data and stakeholder engagement and consultation can be used to increase transparency and decrease room for manipulation. Process standardization, full documentation, and consistent criteria further limit the discretion available to those conducting assessments, while independent verification and monitoring provides a continuous check on assessment integrity.

In **private investment scenarios**, the use of independent cost benchmarks is a central means to review the reasonability of the needs proposal prior to the decision of investment/ contracting.

2. Inflation of Reconstruction Costs

The mitigation of reconstruction cost inflation builds directly on the measures applicable to needs assessment manipulation, since the two risks are structurally linked: an inflated baseline creates the conditions for inflated cost estimates to follow without detection. Independent validation of cost estimates, benchmarking against comparable projects, and the use of standardized cost references constitute the core response.

In **public and private settings**, price benchmarking may be operationalized through a price reference database. Technical specification standards can help to prevent arbitrary price and material demands and thus, project costs.

3. Manipulation of Evaluation and Selection Criteria

The mitigation of manipulation risks in the design of evaluation and selection criteria centers on limiting discretion, ensuring transparency, and establishing structured and documented evaluation processes.

In **public investment scenarios**, tender requirements are established by matching requirements with the needs assessment. Standardization of the process, coupled with increased transparency and independence limits room for favoritism and manipulated evaluation and selection criteria.

In private arrangements, technical neutrality of requirements may be employed through external technical review of specifications.

4. Opaque Ownership Structures and Undisclosed Conflicts of Interest

Beneficial ownership verification and conflict-of-interest management are consistent mitigation requirements. Generally, conflict of interest management is operationalized through mandatory conflict of interest declarations, disclosure of political funding sources, and/or cross-checking with lobbying registries, and enforcement of cooling-off rules.

In **private investment scenarios**, integrity due diligence measures through KYC and KYB procedures, beneficial ownership verification, sanctions and PEP screening, and risk-based contractor assessments can be employed.

In **public investment settings** and the reliance on Prozorro and its auction process, bidder verification may be employed through background checks, cross-checking for conflicts of interest, analysis of beneficial ownership structures, and verification of exclusion grounds. Participant eligibility screening and exclusion on defined grounds, such as prior involvement in fraud or corruption convictions, may be employed to increase bidder integrity.

5. Collusion, Cover Bidding, and Market Manipulation in the Auction Phase

Mitigation of collusion, cover bidding, and market manipulation in the auction phase is only relevant to the **public-public investment scenario**, where the Prozorro platform provides the primary procurement mechanism. Automated detection systems that alert for suspicious behavior that monitor patterns across tenders is central. Furthermore, independent auction oversight can be employed via real-time monitoring by independent observers, public accessibility of auction data, and verification of process integrity. Mandatory anti-collusion declarations and predefined exclusion grounds can increase the integrity of bidders pre-auction.

II. Contracting Phase

The mitigation measures applicable to the contracting phase address three principal risk areas: manipulation of the selection and award process, structural contract design, and opaque ownership structures and undisclosed conflicts of interest.

1. Manipulation of the Selection and Award Process

The foundational mitigation response to the risk of manipulation in the selection and award process is the combination of structured and documented evaluation procedures, independent review mechanisms, and accessible challenge and oversight channels.

In **public-public investment settings**, in order to maintain transparency of the selection process, mandatory publication of evaluation results with detailed reasons for decisions can enable stakeholder scrutiny. Independent audit and monitoring through sample-based internal audits, oversight by independent bodies, and monitoring tools such as Prozorro may further be employed to increase procedural integrity.

In **private arrangements**, the risk that negotiating personnel may be influenced during the selection and award phase by undisclosed relationships with counterparties, can be addressed via conflict-of-interest declarations referencing specific counterparties. In addition, adhering to a complete audit trail for all material negotiation positions and deviations can limit subjectivity and increase transparency. Mandatory compliance functions that review and sign off, and that are independent from the departments previously involved in pre-contracting procedures, may further be installed.

2. Structural Contract Design

During the contracting phase, measures addressing the risk of structural contract manipulation can be mitigated with the following measures.

Within **public and private settings**, contracts must include clear performance indicators, reporting obligations, audit rights, and anti-corruption clauses as non-negotiable components. Any attempt to weaken these provisions is to be registered as a risk factor. Contractual integrity clauses – including anti-corruption provisions, audit rights, sanctions clauses, repayment obligations, and termination rights – are required as mandatory components as non-negotiable minimum standards, creating a legally enforceable basis for action in cases of breach.

Within the **public setting**, transparency via publication of contract details on Prozorro, coupled with external review, should be employed. Within the **private investment setting**, an independent compliance function can be employed to review and sign off.

3. Opaque Ownership Structures and Undisclosed Conflicts of Interest

Beneficial ownership verification and conflict of interest management are consistent mitigation requirements across all investment scenarios and phases as non-negotiable minimum standards within the contractual integrity clause framework. This means that any counterparty attempt to remove or weaken this provision is treated as a risk indicator and escalated.

III. Contract Execution and Management Phase

1. Non-Adherence to Contract Terms

Non-adherence to contract terms may be prevented by conditioning disbursement on verified delivery rather than contractor self-reporting. Across **all investment scenarios**, this is best achieved through milestone-based payment structures, independent technical oversight, and continuous monitoring mechanisms.

2. Unreasonable Contract Amendments

Unjustified ex-post contract amendments may be prevented through restrictive amendment governance frameworks that predefine permissible circumstances for modifications, require documented justification, and mandate independent review before approval.

3. Document Fraud: False Progress Reporting, Overbilling, and Fake Invoices

Manipulation of project progress reports may be prevented by structurally separating progress verification from contractor self-reporting. Overbilling and the submission of fake invoices may be prevented through three-way matching, automated anomaly detection, strict segregation of duties in payment authorization, and milestone-contingent disbursement verified by independent technical supervisors.

4. Misuse or Diversion of Funds

Misuse or diversion of funds may be prevented through purpose-locked disbursement structures, segregation of financial duties, audit rights, and continuous transaction monitoring.

5. Conflicts of Interest and Opaque Ownership Structures

Continuous updates and cross-checking of conflict-of-interest declarations throughout execution, combined with verification against business registries and public databases remain central to avoid conflicts of interest arising after contract granting. Whistleblower mechanisms create an additional channel for reporting hidden conflicts not detectable through documentary review.

6. Informal Influence Structures, Lobbying, and Political Influence

Informal influence over execution decisions – whether exercised through lobbying, political pressure, or administrative gatekeeping – may be prevented by separated oversight and payment functions, combined with transparent public reporting.

IV. Monitoring and Oversight Phase

1. Inefficient or Non-Comprehensive Oversight

Inefficient or non-comprehensive oversight may be prevented by ensuring that audit coverage is both risk-sensitive and structurally complete, rather than limited to low-risk or administratively convenient areas. Across **all investment scenarios**, this is best achieved through risk-based audit planning that is transparently documented and consistently applied, supplemented by random sampling to prevent predictable audit patterns. Mandatory project audits at defined mid-point and completion stages, reporting directly to the audit committee, provide structural assurance that oversight remains comprehensive throughout the investment lifecycle.

2. Audit Manipulation or Interference

Audit manipulation or interference may be prevented by structurally separating the audit function from the activities it reviews and ensuring that reporting lines run to independent governance bodies. Across **all investment scenarios**, the internal audit function should report to a senior leadership body or independent audit committee, with periodic rotation of audit staff and external quality reviews. Standardized audit methodologies with documented, evidence-based findings ensure consistency and defensibility across audit cycles; strict documentation requirements create a full audit trail that deters interference.

3. Remediation Tracking Failures and Suppression of Compliance Concerns

Remediation tracking failures and the suppression of compliance concerns may be prevented by combining centralized finding registers with accessible, genuinely independent reporting channels. Across **all investment scenarios**, a centralized audit finding register should record each finding alongside the agreed remediation measure, the responsible owner, and the target completion date, with automatic escalation of overdue items and systematic monitoring of corrective action progress. To address suppression risks, confidential whistleblowing channels should be accessible to all project personnel, contractor employees, and supplier employees, with genuine confidentiality protections and independent review mechanisms.

4. Information Asymmetry and Moral Hazard

Information asymmetry and moral hazard may be mitigated by ensuring that oversight actors have timely, structured access to project-level data and that payment structures create incentives aligned with verified performance rather than self-reported progress. **Across all investment scenarios**, payments should be linked to independently verified milestones and deliverables and implementation evidence. Digital monitoring systems and open procurement platforms also help insurers and investors verify project performance and reduce information asymmetries. Furthermore, insurance coverage may be tied to strict transparency, compliance, and reporting requirements, thereby incentivizing borrowers and contractors to maintain accountability and reduce opportunistic behavior.

H. CONCLUSION AND OUTLOOK

Ukraine’s anti-corruption framework largely meets international benchmarks at the level of formal legislation and institutional design; however, persistent deficiencies in enforcement, institutional independence, and practical application continue to present material corruption risks for all actors participating in the country's reconstruction. This Framework has sought to bridge the gap between formal requirements and operational practice by translating the diverse compliance obligations of investors, international institutions, and national legal systems into a structured set of risk-specific mitigation measures, differentiated across the four principal investment scenarios and the full project lifecycle.

Ultimately, the credibility and consistent implementation of robust integrity measures in alignment with the specific circumstances of each individual case will be decisive not only for protecting reconstruction funds from misuse, but also for building the investor confidence that is indispensable to Ukraine's long-term economic recovery and stability.

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With thanks to Nana Kalandarishvili, FTI Consulting; Dr. Franca Langlet, FTI Consulting; Johanna Hoelzl, FTI Consulting; Anushka Raja, FTI Consulting; Siham Al Ghaddioui, FTI Consulting; Christopher Henschel, FTI Consulting; Dr. Jakob Tybus, Morrison Foerster and Tim Bartels, Morrison Foerster for their support.

This publication presents a concise version of the framework. The full framework explores these topics in greater depth and includes expanded analysis and implementation approaches.