



NAKO

TI UKRAINE • TI-DS



2023 ANNUAL REPORT

**Independent Anti-Corruption
Commission (NAKO)**

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ACRONYMS

CMU	Cabinet of Ministers of Ukraine
CPI	Corruption Perceptions Index
EU	European Union
FCDO	UK Foreign, Commonwealth & Development Office
GBP	British Pound
IPHR	International Partnership for Human Rights
IRF	International Renaissance Foundation
LGBT+	Lesbian, Gay, Bisexual, and Transgender
LLP	Limited Liability Partnership
MoD	Ministry of Defence of Ukraine
NABU	National Anti-corruption Bureau of Ukraine
NACP	National Agency on Corruption Prevention
NAKO	Independent Anti-Corruption Commission
NATO	North Atlantic Treaty Organization
NGO	Non-governmental Organisation
OECD	Organization for Economic Cooperation and Development
PGO	Prosecutor General Office
SBI	State Bureau of Investigation
SBU	State Security Service of Ukraine (acronym from the Ukrainian)
SLO	State Logistics Operator
UAH	Ukrainian Hryvnia
UAV	Unmanned Aerial Vehicle
UDI	Ukrainian Defence Industry
UK	United Kingdom
UN	United Nations
USSR	Union of Soviet Socialist Republics
UVF	Ukrainian Veterans Fund

ABOUT US

The Independent Defence Anti-Corruption Commission (NAKO) is a non-governmental organization (NGO) that combats corruption and promotes good governance in the security and defence sector. Its goal is to reduce the risks of corruption through quality research, effective advocacy, and public awareness.

NAKO analyses corruption risks and other challenges to good governance in Ukraine's national security sector and provides relevant recommendations to government agencies. It promotes government agencies' transparency and accountability to the public, accelerates reforms in the national security sector, and exercises public control over anti-corruption reforms in state security and defence structures. NAKO was founded in 2016 as the Independent Defence Anti-Corruption Committee by the Defence and Security Anti-Corruption Program of Transparency International UK and Transparency International Ukraine. In 2019, NAKO became a separate civil society organization. Today, NAKO maintains a strategic partnership with the Transparency movement.

Since the beginning of Russia's invasion, NAKO has joined the collective effort to

weaken the Russian war machine. The organization has focused on sanctions against the Russian defence industry and critical components for producing weapons and equipment for the Russian army.

Leveraging NAKO's unique expertise in the security and defence, we analyse foreign components used in Russian military weapons and equipment to advocate for further policies to influence Russia's military capabilities.

NAKO submits proposals to Ukraine and its Western partners, in particular to the European Commission, to include Russian companies in the sanctions lists that are involved in the defence industry and whose products are used in the war against Ukraine.

In the context of Russia's full-scale war, NAKO is also actively engaged in international advocacy for Ukraine's interests. In particular, its efforts are focused on advocating for financial assistance to Kyiv, countering manipulative Russian narratives about corruption in Ukraine, and advocating for stronger anti-Russian sanctions and additional measures necessary to weaken the Russian Federation regime.

INTRODUCTION BY ANDREW BAIN, CHAIRMAN OF THE NAKO BOARD



“There is a lack of systematic coordination between countries in imposing sanctions against Russia’s military-industrial complex, and the imposition of sanctions is delayed for years.”



Last year was important for the NAKO in promoting reforms in Ukraine’s defence sector. We focused on supporting the Ministry of Defence of Ukraine (MoD) and the National Agency on Corruption Prevention (NACP) in achieving their anti-corruption goals. Our organization was actively involved in preparing the State Anti-Corruption Strategy and the State Anti-Corruption Program (adopted by the Cabinet of Ministers in March 2023), and our recommendations were included in both documents.

Therefore, as a working group member monitoring the implementation of the Strategy and Program, NAKO is and will continue to monitor, provide analytical recommendations, and publicly present an interim assessment of the implementation to stakeholders and a wider audience. NAKO, as a member of the relevant working group under the MoD, also contributes to developing the MoD’s Anti-Corruption

Program, which is expected to be ready by the end of 2024.

Efforts by the government and civil society to fight corruption are yielding concrete results. In particular, society feels the changes are for the better, as evidenced by Ukraine’s score in Transparency International’s Corruption Perceptions Index (CPI). In 2023, Ukraine received 36 points out of 100 possible. And now it ranks 104th out of 180 countries. Ukraine’s 3-point increase is one of the best results in the world over the past year. Ukraine also became one of the 17 countries in this year’s CPI that demonstrated its best score ever. Of course, Ukrainian society still has some work to do and improvements to make. However, there is a trend, and it is encouraging. The role of Ukrainian civil society is to support the transformation processes in the country as much as possible.

INTRODUCTION BY OLENA TREGUB, NAKO EXECUTIVE DIRECTOR



“In Transparency International’s Corruption Perceptions Index, Ukraine has demonstrated the best score for the entire monitoring period.”



In the context of Russia’s full-scale war in Ukraine, one of NAKO’s priorities was to help our country weaken the enemy and limit its ability to obtain Western-made parts that Russia uses in its weapons. Together with our partners, we prepared three studies and one analytical report, in which we carefully disassembled the weapons Russia used in the war against Ukrainians. We studied Shakhtys, Iskanders, Kalibrs, and many other weapons, finding out the origin of a particular component and how it could have been used in the weapons used to kill Ukrainians.

Based on our research, we made recommendations, including for further sanctions and embargoes, tighter export controls, and introducing due diligence by international component manufacturers. We also recommended strengthening diplomatic cooperation to examine the supply chains of Western-made components and submitted proposals for sanctions measures to be considered by governments, multilateral institutions, and individuals.

As a result, based on our recommendations, dozens of Russian companies that produce weapons and components for them were included in the 9th and 10th sanctions package of the European Commission. However, the

mere adoption of sanctions does not guarantee that the Russian military-industrial complex will be forced to stop producing five weapons for the war against Ukraine. After all, Western countries and jurisdictions impose inconsistent restrictions on Russian companies, as evidenced by the latest [NAKO](#) analytical report. After analysing more than 600 legal entities and individuals directly involved in the Russian military-industrial complex, we found that Ukraine and its partners do not have a unified approach to this process. There is a lack of systematic coordination between the countries in imposing sanctions against Russia’s military-industrial complex, and the imposition of sanctions has been delayed for years.

Therefore, we reinforced our research and analytical work with advocacy efforts, in particular, by regularly organizing or participating in public and non-public discussions on this topic at key international platforms. NAKO defended Ukraine’s interests in the U.S. Congress, at the Warsaw Forum, the Paris Peace Forum, and many other important events. For example, in Washington, DC, I spoke during the Helsinki Commission’s hearings in the U.S. Congress on Russian assets in Switzerland. I emphasized that it is the United States and Switzerland that are the largest produc-

ers of components for Russian weapons used by the aggressor country in the war against Ukraine. At the same time, Switzerland itself emphasizes its neutrality.

On the sidelines of the Basel Peace Forum, some local politicians privately suggested ending the war by federalizing Ukraine. In my opinion, Europe, particularly Switzerland, does not understand the scale of the danger. Ukraine is the shield that holds back Russian aggression. Therefore, everyone who has the opportunity should remind us of this during

public events, media speeches, and social networks. Such work should be systematic at the level of governments, representatives of public organizations, opinion leaders, etc. This is exactly what we at NAKO have been doing systematically since the beginning of the full-scale war – conveying Ukraine's position to high-ranking officials and opinion leaders worldwide and calling for support for Ukraine. This is our contribution to the common victory.

NAKO STRATEGIC GOALS AND ACTIVITY OUTCOMES



GOAL 1: BETTER DEFENCE GOVERNANCE

Defence procurement: supporting institutional change



Presentation of the NAKO's analytical brief «Defense procurement during martial law,» Kyiv, March 24, 2023. In the photo: Denys Sharapov, Deputy Minister of Defense; Nelly Stelmakh, an expert on defense procurement reform; Svitlana Musiaka, Head of Research and Policy Development (NAKO); Anastasiia Radina, Head of the Verkhovna Rada Committee on Anti-Corruption Policy.

The monitoring of defence procurement during martial law is very limited, as all procurement for defence and security needs is currently classified. Previously, NAKO actively promoted adopting the Law on Defence Procurement, which was supposed to make such procurement more transparent and accountable, and Parliament adopted the law was in July 2020. This law declassified many defence contracts, creating a competitive and transparent environment for the defence market. However, after the outbreak of full-scale war with Russia, the Cabinet of Ministers of Ukraine (CMU) adopted emergency

procedures, resulting in classifying all defence procurement contracts and a “shift” to direct contracts with suppliers. Consequently, state agencies could no longer use the procedures provided by the Law on Defence Procurement and the Law on Public Procurement.

Even though monitoring was as limited as possible, in March 2023, NAKO analysed the existing corruption risks and [prepared an analytical report](#) outlining the state of defence procurement. Anastasiia Radina, Head of the Parliamentary Committee on Anti-Corruption Policy, and Deputy Minister of Defence Denys

Sharapov attended the report presentation. Among NAKO's key recommendations were to (re)launch an effective procurement agency, increase parliamentary and public control over procurement, and develop new legislation that would make defence procurement transparent during the full-scale war.

Later, at the end of 2023, the Ministry of Defence began to build a new procurement architecture that would make corruption impossible and meet NATO standards, which is the approach NAKO has been systematically recommending for several years. In the first days of 2024, it was announced that the Defence Procurement Agency's management would be changed. This agency deals with contracts for the supply of weapons. Changing the management, i.e., the appointment of Maryna Bezrukova as the head of the agency, was an

important step towards a radical reboot of the agency. NAKO positively praises the agency's efforts to change approaches to defence procurement, and many Ukrainian media outlets [praise the agency's work](#) regarding the amount of money saved on procurement.

In December 2023, the Ministry of Defence established the State Logistics Operator (SLO), a state agency that meets the logistical needs of the Armed Forces. The SLO procures "non-lethal" products: food, clothing, fuel and lubricants, medical supplies, etc. Creating this agency is also in line with eight of NAKO's previous recommendations. Although too little time has passed since the end of 2023 to say that the agency has been effective, in the first half of 2024, [the SLO](#) saved considerable money in the Ukrainian budget.



NAKO, an NGO with unique expertise in anti-corruption in defence, has been working with both of these procurement agencies, providing them with expert support in the

transition to more efficient and accountable procurement in times of war. It will continue to monitor the agencies' activities in the future.

New architecture of the procurement system of the Ministry of Defence



formulation of
procurement
policy



PROCUREMENT POLICY DEPARTMENT OF THE MINISTRY OF DEFENCE

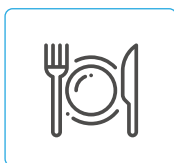


development
of procurement
regulations



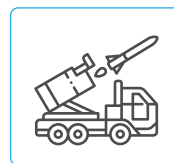
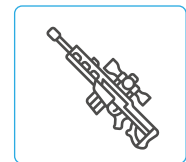
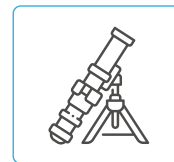
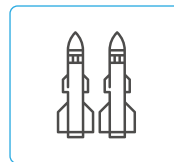
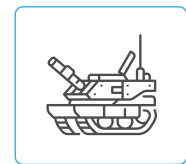
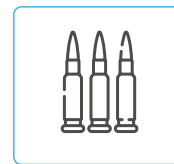
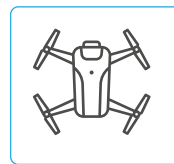
STATE LOGISTICS OPERATOR (SLO)

logistics procurement



DEFENCE PROCUREMENT AGENCY

lethal procurement



Supporting the anti-corruption activities of the Ministry of Defence

In 2023, NAKO systematically cooperated with the Ministry of Defence Department for Detection and Prevention of Corruption. Responding to a request from the department

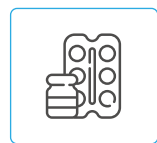
itself, NAKO provided recommendations to reduce corruption risks. In particular, NAKO provided advice on:



defence procurement



non-core assets



medical procurement and housing



international security assistance



developing anti-corruption programs and procedures



promoting cooperation with Transparency International Defence and Security



improving Ukraine's performance in the Transparency International Defence Integrity Index

The Ministry of Defence has repeatedly recognized NAKO's contribution to building the integrity of this body in public statements.

Monitoring the implementation of the State Anti-Corruption Program

The State Anti-Corruption Program 2023-3025 is the key document that defines the policy of the government and state structures to reduce corruption risks in the defence sector, which the National NACP developed to implement the State Anti-Corruption Strategy. The CMU approved the program in March 2023, which should mean increased control over its implementation.

NAKO helped the NACP develop both the strategy and the implementation program, and the vast majority of NAKO's recommendations were incorporated into the documents. The State Anti-Corruption Program clearly defines which state agencies they should reduce corruption in Ukraine, including in the defence sector, and how. The State Program contains performance indicators for each executive body.



Presentation of the anti-corruption strategy of “Ukroboronprom,” Kyiv, September 1, 2023

NAKO also monitored the program’s implementation through an online platform where every citizen of Ukraine can clearly track how the executive authorities fulfil their responsibilities to reduce corruption risks.

In summer 2023, NAKO published an [analysis](#) of 35 key measures of the State Anti-Corruption Program for 2023-2025 in the defence sector and identified factors that will have a key impact on the success of their implementation, including:

- adjusting the strategy for implementing measures by their level of sensitivity;

- using an effective process management system when implementing measures at the level of responsible ministries and agencies;
- establishing proactive monitoring of the progress of measures with the involvement of the public and experts on the basis established by law.

In 2024, the State Program will be revised to reflect current risks as much as possible, and NAKO will provide its expert support during the revision and adaptation. In addition, as a leading civil society organization in Ukraine’s





Press conference “How to implement anti-corruption policy in the security and defense sector during the war?” Kyiv, July 19, 2023. In the photo: Vasyl Samokhvalov, event moderator; Oleksii Reznikov, Minister of Defense of Ukraine; Oleksandr Novikov, Head of the National Agency on Corruption Prevention (NACP); Oleksandr Kamyshin, Minister for Strategic Industries of Ukraine.

defence sector, NAKO will continue [to monitor the implementation of the State Program's activities](#) related to the defence sector.

NAKO also helped to develop another important document, the Ministry of Defence Anti-Corruption Program, which is a separate document that is still being developed. It defines the measures necessary to reduce cor-

ruption risks in the defence sector; in particular, it strengthens the efficiency of defence procurement, management of defence land, real estate management, intellectual property management, and providing housing for military personnel. When the program is implemented in practice, it will significantly improve governance in the MoD.



Strengthening public oversight of the defence sector

On April 10, 2023, **Ukraine established the Public Anti-Corruption Council under the MoD**. This independent body emerged after a high-profile scandal involving the Ministry's food procurement, which drew special attention to corruption risks in the defence sector. **One of the council's key tasks was to strengthen public control over the defence ministry**. Creating this council under the MoD was an unprecedented step and intended to demonstrate the transparency and openness of procurement processes.

The council members were elected by 40,000 Ukrainians through an independent electronic voting mechanism via the NACP platform. The first council consisted of 15 people elected in an open, nationwide vote. Among them are journalists, volunteers, and public figures, i.e., those knowledgeable and trusted in fighting corruption. NAKO's Executive Director, Olena Tregub, joined the MoD Public Anti-Corruption Council as an elected member.

From the very beginning of the council, NAKO has provided expert support to this public body, strengthening its anti-corruption capacity. The NAKO team provided expert advice at almost 100 council meetings, which ensured the body's more professional work.

The MoD Public Anti-Corruption Council has catalysed reforms and the anti-corruption struggle in Ukrainian society. This civic body's key areas of work included logistics, includ-

ing food and clothing. With the launch of the Anti-Corruption Council, **a separate agency, the State Logistics Operator (SLO), was created under the MoD, which is responsible for procuring food, clothing, fuel and lubricants, and medicines**. However, even before the launch of the SLO, **the Council's efforts helped save UAH 8 billion** by returning procurement to Prozorro, where companies can fully compete.

Thanks to the efforts of the Anti-Corruption Council, **three criminal proceedings were initiated against the MoD**: two by the National Anti-Corruption Bureau (NABU) and one by the State Bureau of Investigation (SBI).

The Anti-Corruption Council members oversaw staff selection **for the MoD Anti-Corruption Department**. This department should help strengthen the ministry's capacity to prevent corruption. In particular, the Anti-Corruption Council monitored the people with negative reputations for corruption who were not hired by the department.

The Anti-Corruption Agency's effectiveness is not lost on Ukraine's international partners. The fact that Ukraine has elected "inspectors from the people" who can check defence procurement amid a full-scale war is respected. NAKO will continue providing comprehensive support, including professional legal support, to the Anti-Corruption Council, strengthening its capacity.



GOAL 2: TRANSPARENT AND ACCOUNTABLE DEFENCE INDUSTRY

Reforming the state defence concern Ukroboronprom

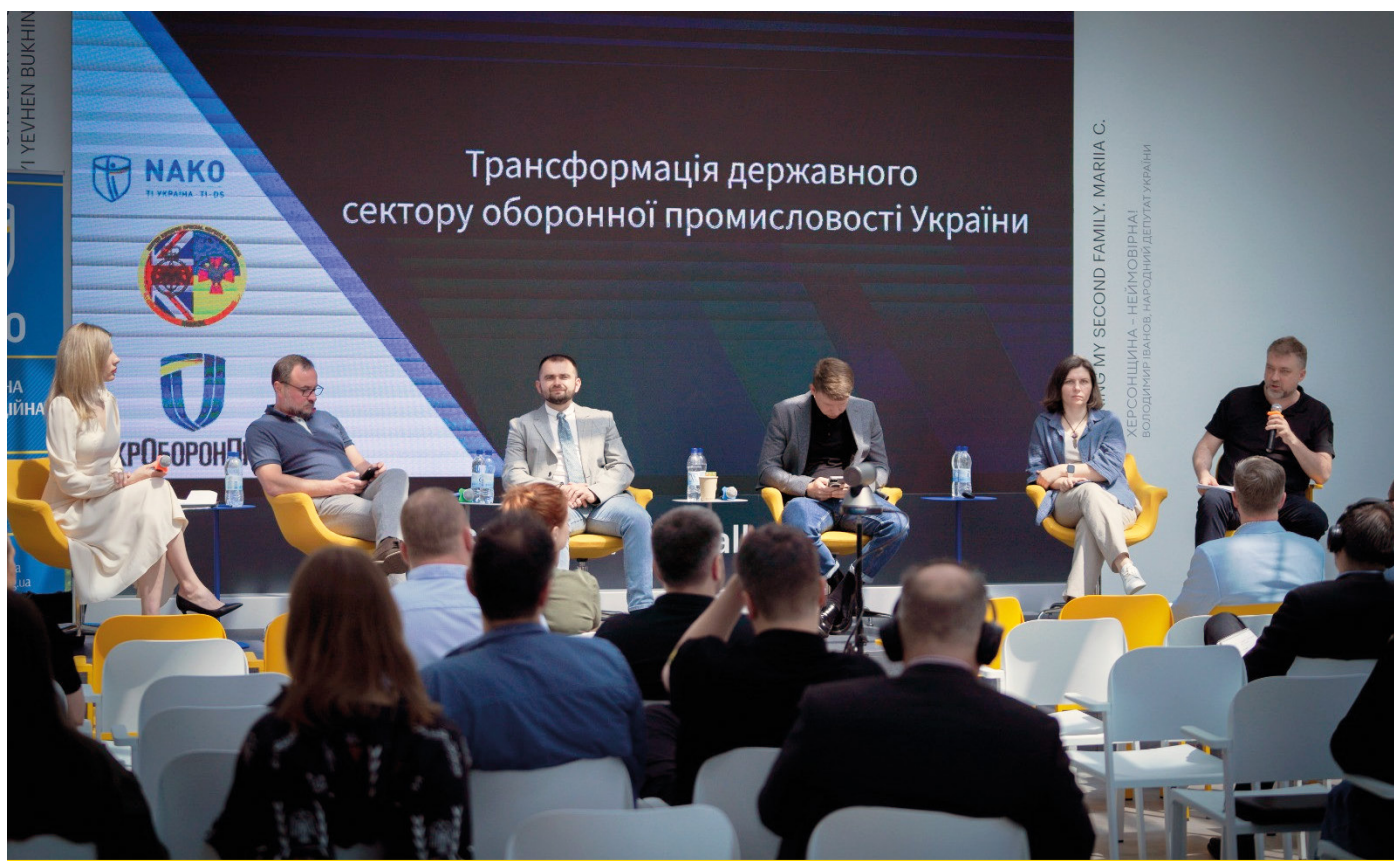
One of the landmark events of 2023 was **the reform of Ukroboronprom**. NAKO has been insisting on its reform for almost six years. The historic **transformation of the state-owned Ukroboronprom into the Ukrainian Defence Industry (UDI)** is an important step in transforming the defence industry on the path to good governance. To ensure that the reforms occur in practice, not just on paper, **NAKO has been systematically promoting the implementation of international anti-corruption standards and Organization for Economic Cooperation and Development (OECD) standards in the work of the Prosecutor General Office (PGO)**. If imple-

mented, these standards will be an important part of Ukraine's post-war recovery and economic growth.

NAKO systematically advocated for the reform, initiating meetings with the Ukroboronprom management, particularly with the Director General of the concern. NAKO provided specific recommendations on implementing corporate governance reform in practice. NAKO also organized [discussions on the prospects of corporatization](#) with top government officials, including Minister for Strategic Industries Oleksandr Kamyshyn and Deputy Minister of Defence Volodymyr Havrylov.



Panel discussion “Transformation of the State Defense Industry Sector of Ukraine,” Kyiv, June 9, 2023. In the photo: Olena Tregub, Executive Director of NAKO; Serhiy Markovskiy, Advisor to the “Ukroboronprom” concern; Hlib Kanevskiy, Head of the NGO State-Watch; Oleksandr Lysenko, Independent Corporate Governance Consultant; Svitlana Musiaka, Head of Research and Policy Development at NAKO; Andriy Zahorodniuk, Member of the Supervisory Board of the state concern “Ukroboronprom.”



In promoting good governance reform, NAKO effectively coordinated its efforts with international partners in Ukraine. Thus, [after a meeting with U.S. Secretary of State Anthony Blinken](#), the United States included this reform as [one of the key requirements for in-](#)

[ternational assistance](#) to Ukraine. The CMU announced in March 2023 the transformation of state concern Ukroboronprom into a joint-stock company called the Ukrainian Defence Industry.

Prerequisites for reforming Ukroboronprom

After the collapse of the Soviet Union, Ukraine retained 30% of the USSR's military-industrial complex, so Ukrainian and Russian military-industrial enterprises were interdependent. Many arms were sold in the 1990s and early 2000s, leading to uncontrolled cash flows. In 2010, then-president of Ukraine Viktor Yanukovich centralized these cash flows by merging defence enterprises into Ukroboronprom. Instead of modernizing production, the concern

sold weapons, which led to a weakening of Ukraine's combat readiness.

The very form of "concern" was also incompatible with Western corporate structures, which created difficulties and restrictions for business with Ukroboronprom through partnerships or investments. **Corruption and lack of accountability led to harmful consequences for Ukraine's sovereignty, espe-**

cially during Russia's invasion in 2014.

Since 2017, NAKO has been calling on the government to introduce good governance at Ukroboronprom and provided specific recommendations on how to do it. In particu-

lar, NAKO helped develop and advocated for adopting draft law #3822 “On peculiarities of reforming state-owned enterprises of the defence industry.” The law was adopted in 2021, and the corporatization of Ukroboronprom finally began in 2023.

TIMELINE OF UKROBORONPROM REFORMS:



2017
year

NAKO called on the government to introduce good governance in Ukroboronprom, in particular, it **helped to develop and advocated for adopting draft law #3822** “On peculiarities of reforming state-owned defence enterprises.”



**2019-
2020**
year

NAKO, with the involvement of international experts, made a significant **contribution to the procurement of independent audit services for the Concern and its enterprises**. Thanks to this, it was possible to successfully conduct a tender in 2019 and perform an audit in 2020.

NAKO regularly **participated in the Nomination Committee**, which selected directors for the Concern's enterprises in transparent competitions. For example, the directors of those enterprises were elected: 410-ЦА, «Zorya-Mashproekt», and «Impuls».



2021
year

The law “On peculiarities of reforming state-owned defence enterprises” was adopted. NAKO's consistent advocacy for implementing OECD standards contributed to adopting the law. In particular, our recommendations improved the provisions on the powers of supervisory boards and the movement of property and resources.



2023
year

The Cabinet of Ministers of Ukraine **approved a resolution to transform** the State Concern «Ukroboronprom» into the Joint Stock Company «Ukrainian Defense Industry».

What does the corporatization of Ukroboronprom mean?

The Ukrainian Defence Industry (UDI) merged various joint-stock companies (137 in total) that specialize in specific business areas. Now, the company can operate according to Western standards and increase compatibility with international partners. By the end of 2023, 28 of the previous Ukroboronprom enterprises had already been corporatized, and another 10 were transitioning. The joint-stock company's main business goal is to develop international partnerships for joint production in Ukraine or for Ukraine.

Changes resulting from the corporatization of UDI into a joint-stock company:

- The modern corporate structure makes the company more compatible with Western companies, facilitating partnership agreements with foreign firms and increasing its arms production capabilities compared to the previous legal structure of a “concern.”
- UDI remains fully state-owned, but

the corporate structure allows for mergers within the company, which potentially simplifies operations and paves the way for future investments from both internal and external sources. In the long run, this may make privatization possible.

- The Western corporate structure introduces a system of internal checks and balances through various governing bodies, such as the management board, the supervisory board, and the state as the sole shareholder. This structure should prevent the concentration of control in the hands of one person, particularly the President of Ukraine.

The appointment of the MoD's Director General should include the participation of the Supervisory Board and the CMU, taking into account feedback from prominent members of civil society through the MoD Anti-Corruption Council.

Results of the year for the defence industry

In 2023, the following changes were made in Ukraine's defence industry that increase transparency and reduce corruption risks in the sector:

- **The UDI Supervisory Board was established**, consisting of five members, including three state representatives

and two non-state representatives: independent experts from various professions, including academia, industry, and former government officials. The selection process included consultations with civil society representatives to ensure transparency and accountability.

- **Civil society representatives from anti-corruption NGOs were included in the MoD Anti-Corruption Council.** This institutional mechanism provides closer oversight and recommendations on various processes, including procurement and appointments in the UDI. Olena Tregub, NAKO head, is a council member.
- **An updated property management policy for defence companies** was introduced to increase the efficiency and accountability of resource allocation, which is expected to optimize opera-

tions in the defence sector.

- **A landmark joint venture between UDI and the German company Rheinmetall AG** was established, Rheinmetall - Ukrainian Defence Industry LLC. This partnership focuses on the maintenance and repair of armoured vehicles, joint production of Rheinmetall products, and cooperation on new weapons, all of which will be carried out in Ukraine. This joint venture marks a significant step in promoting international cooperation and technological progress in Ukraine's defence industry.

Monitoring Appointments to Director Positions at JSC “Ukrainian Defense Industry”

Since 2019, **NAKO has observed the selection process for the director positions at several enterprises of the then State Concern “Ukroboronprom.”** The implementation of such competitions aimed primarily to bring out of the shadows the main personnel decisions of the concern's management, allowing external observers, including representatives of partner countries' embassies and civil society, to see the selection process firsthand and voice any questions or opinions to both the management and potential candidates.

The public's participation in this process has always been advisory: we analyzed the candidates, asked them clarifying questions about their integrity and corruption risks, and ultimately expressed our opinions on the support or non-support of specific candidates.

The public's conclusions were only sometimes taken into account. For example, Oleksii Popov was appointed head of State Enterprise “Plant 410 CA” at the beginning of 2020 and was dismissed six days later following a scandal. The public had warned about the risks of his candidacy during the selection process, but the concern ignored our warnings then.

The full-scale invasion halted the competition, resuming only in the fall of 2023. NAKO, as before, joined this process: **in 2023, we participated in 12 out of 13 competitions**, reviewing 80 candidates. We prepared overall statistics and described the main trends based on these selections.

All the selected candidates had worked in the defense industry and held various managerial

positions in the past, with an average work experience of 13.5 years. The youngest head of an enterprise was 33 years old. The most experienced manager had 28 years of experience. Compared to previous years, the 2023 selection process was characterized by a generally low level of risk for most candidates. Only 6.2% received a negative assessment from NAKO, while another 17.5% had a medium level of risk. No recorded corruption risks were identified for 81.25% of the candidates – this includes administrative cases and potential instances of direct or indirect corruption mentioned or inspired in the media of varying de-

grees of reliability.

Those ultimately chosen to head several Ukroboronprom enterprises had only a low level of risk: none had recorded specific criminal cases or examples of corruption.

Although the 2023 selection process is notably different from previous ones due to the significantly lower risk level, it does not safeguard against future corruption or guarantee the overall effectiveness of the selected individuals. The public, particularly NAKO, will closely monitor this in the future.



NAKO experts participated
in **12** out of **13** competitions



80 candidates
reviewed



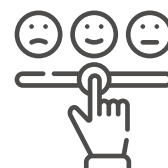
PORTRAIT OF THE CANDIDATE

13,5 years the average
number of years of
experience



28 years of experience the most
experienced manager

Interesting fact:
the youngest CEO is **33** years old



Only
6,2 %

candidates received a negative
NAKO assessment,

while **17,5 %** had an
average level of risk



GOAL 3:

DEMOCRATIC CIVILIAN CONTROL OF THE DEFENCE SECTOR AND REDUCTION OF SECRECY

Traditionally, NAKO has provided expert support to the Verkhovna Rada Committee on National Security, Defence, and Intelligence

to strengthen the capacity of the Ukrainian parliament in parliamentary oversight of the defence sector.



draft laws analysed



The draft law «On Security of Classified Information»



The draft law on democratic civilian control over the Armed Forces of Ukraine

Strengthening parliamentary control over the defence sector

Analysis of Draft Law “On Security of Classified Information”

NAKO participated in developing **draft law #8394 “On Security of Classified Information”**, advising the Verkhovna Rada Committee on National Security and the NACP on the text of the draft law.

In general, adopting this draft law is strategically important for harmonizing Ukraine’s

legislative framework with NATO and European Union (EU) security requirements and standards. In other words, it potentially brings Ukraine closer to integration with each of these organizations. The draft law contains some positive provisions that are important for ensuring a balance between guaranteeing the right of access to information and national security.

At the same time, despite the progressive nature of certain provisions of the draft law, the

proposed text also has a number of systemic shortcomings, such as preserving the concept of a single list of classified information and the monopoly of the Security Service of Ukraine (SBU) on restricted information, which leads to a conflict of interest, reduced transparency, and increased corruption risks in this area.

With this in mind, NAKO prepared [an analysis of corruption risks in the draft law](#) for the National Security Committee and provided specific recommendations for amendments that would help avoid these risks.

Analysis of the draft law on democratic civilian control over the Armed Forces of Ukraine

NAKO was also involved in developing an [analysis of draft law #4210](#) on strengthening democratic civilian control over the Armed

Forces of Ukraine. The draft law defines the legal framework for democratic civilian control over the Armed Forces, military leadership, and defence planning procedures in national security and defence. This will make it possible to reconcile democratic values with an adequate defence policy.

Important positive provisions of the draft law include specifying requirements to appoint civilians to the positions of Minister of Defence, First Deputy Minister, and other deputies, and at least five years must have passed since the dismissal of appointees from military service.

The draft law is in line with the principles of civilian control adopted by NATO and EU member states, which are extremely important for the normal functioning of military management, including in our country's current situation – war.



GOAL 4: IMPLEMENTATION OF THE WOMEN, PEACE, AND SECURITY AGENDA

3

research
studies



The study “NB 5.0. Monitoring of recommendations and research results from the Invisible Battalion cycle”



The study “Women’s Access to Military Education in Ukraine”



The study “Discrimination of Different Social Groups in the Armed Forces: Views of Military and Civilians”

Analytical studies of the Women, Peace, and Security agenda

In the context of Russia’s full-scale invasion of Ukraine, about 32,000 women serve in the Armed Forces of Ukraine, more than 5,000 of them directly on the front line. In view of this, there is **a growing need to advance implementation of the objectives of the National Action Plan for the Implementation of United Nations UN Security Council Resolution 1325 on Women, Peace, and Security until 2025**. In particular, this involves promoting gender equality in all spheres of life, from decision-making in the security and defence sector to military education. Ukraine has defined gender equality as an important component of further development and one of the state policy priorities.

NAKO worked on implementing specific measures of the Women, Peace, and Security Resolution that promote the full and effective participation of women in key processes and decision-making in the security and defence sector. In July 2023, NAKO, NGO Institute for Gender Programs (known as the Invisible Battalion project), NGO Legal Hundred, and Kyiv-Mohyla Academy published a comprehensive study on gender barriers that prevent women from starting and building a military career. The study [“NB 5.0. Monitoring of recommendations and research results from the Invisible Battalion cycle”](#) highlights the status of women and gender equality in the military, the position of women veterans in Ukrain-

An interdisciplinary study**IB 5.0 MONITORING OF
RECOMMENDATIONS AND
RESEARCH RESULTS FROM THE
“INVISIBLE BATTALION” CYCLE**

conducted as part of the NAKO project
“Promotion of Gender Equality in the
Ukrainian Armed Forces”



NAKO
TI UKRAINE • TI-DS

ian society, and sexual harassment in the Ukrainian military.

The number of women in the Armed Forces is growing dynamically, doubling from 2013 to 2023: as of January 2023, 31,261 women served directly in the Armed Forces, with the number of female officers tripling to 5,112 since the beginning of the war. ***Ukrainian society now supports professional armed forces with access for women***: 80% of survey participants agree that women should be given equal opportunities to work in the Armed Forces and other military formations.

Researcher Tamara Martsenyuk received

the Emma Goldman Award 2023 for leading this study and several other studies that highlight the integration of women in the Ukrainian Armed Forces. This award recognizes outstanding individuals whose work supports the development of civil society and gender equality.

In another study published in March 2023, NAKO identified successful and problematic aspects of women’s access to higher military educational institutions and military lyceums in Ukraine. The sociological study [“Women’s Access to Military Education in Ukraine”](#) states that the principle of gender equality is gradually being ensured in women’s access to military education, but much remains to be done.



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**Sociological study****ACCESS TO MILITARY
EDUCATION FOR
WOMEN IN UKRAINE**

conducted as part of the NAKO project
Promotion of Gender Equality in the Armed
Forces of Ukraine (*abridged version*)

Supporting the Ukrainian Veterans Fund in implementing the Women, Peace, and Security agenda

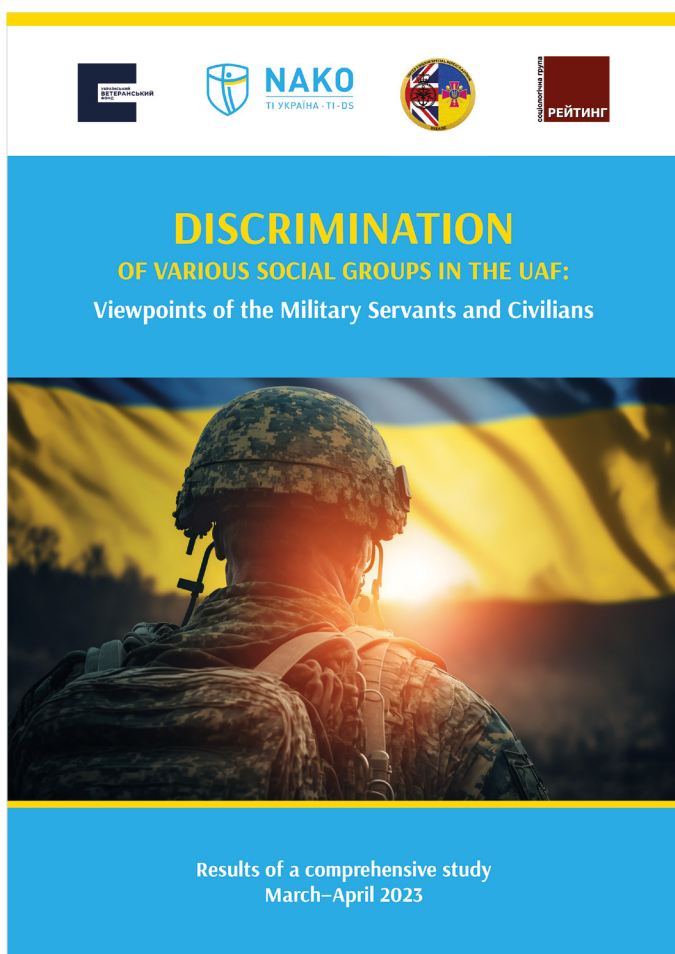
The Ukrainian Veterans Fund (UVF) is a state institution under the Ministry of Veterans Affairs that promotes developing veterans' opportunities. In particular, at the expense of the state budget and international partners, it promotes the businesses and startups of veterans, their families, and the families of

fallen defenders, and supports projects of NGOs working with veterans. Since the UVF was founded in summer 2021, NAKO has been systematically providing analytical and legal support to it as part of implementing the Women, Peace, and Security agenda.

How society treats women and LGBT+ in the army: NAKO research results

In April 2023, NAKO, the UVF, and the Rating sociological group presented a study on discrimination in the Armed Forces. The report

["Discrimination of Different Social Groups in the Armed Forces: Views of Military and Civilians"](#) highlights general trends of possible discrimination against defenders based on their belonging to different social groups, from women and LGBT people to representatives of different nationalities.



In general, the situation with inequality and discrimination has been improving, especially since the beginning of Russia's full-scale invasion of Ukraine, but this improvement is not uniform across different social groups. For example, ***the number of women in the Armed Forces is increasing and they are becoming more and more visible. Women who have already had combat experience are treated with particular respect.*** At the same time, there are still many stereotypes that women have to "break through" to be able to serve. Most of these stereotypes are held by so-called "commanders from the Soviet past" who can also be outright sexists. In this case, ***the attitude of the commander and the command to discrimination or non-discrimi-***



nation plays a major role. According to an interview with a focus group participant, if the commander is normal, then the attitude towards women in the unit is also normal.

The important role of the commander is also evidenced by interviews with LGBT service members. Society's attitude of towards them, as well as their colleagues' attitude in general, is gradually improving. However, there are still many homophobes in the army, and a "normal attitude" is mostly present where there is a decent commander. At the same time, there are still units and branches of the army where members of the LGBT community are unwel-



Presentation of the sociological study: "Discrimination of various social groups in the Armed Forces of Ukraine: perspectives of military personnel and civilians," created by the Ukrainian Veterans Foundation of the Ministry of Veterans Affairs in co-operation with the Independent Anti-Corruption Commission (NAKO), Kyiv, June 5, 2023.

come. For example, **"Azov, the Airborne Forces, and intelligence will not accept [you], so you have to hide your LGBT+ status."**

The study also analysed possible discrimination against national minorities in the Armed Forces, convicted veterans, and female veterans, and examines psychological problems and issues of psychological assistance.



Legal support to the Ukrainian Veterans Fund Hotline

To support implementing the Women, Peace, and Security Resolution, **NAKO provided lawyers for the UVF Hotline**. NAKO provided this legal assistance at a time when it was greatly needed, **while studying the real-life cases faced by service members, women veterans, and their families during a full-scale war**. NAKO analysed their direct and indirect needs and now has a much better understanding of how it can meet the needs of this audience. **More than 1,500 veterans and their family members**, mostly female family members of male veterans, **have contacted the hotline for help** since its launch. The most frequently asked questions include how to receive one-time financial assistance in the event of a family member's death in combat, what benefits exist and how to obtain them for family members of those killed in combat, how to pass a military and medical

commission, how to obtain combatant status, and how to search for family members who are missing or in captivity in Russia.

NAKO also found that **most service members, women veterans, and their families are not properly informed about their rights** and feel very confused about all issues related to their rights. This underscores the critical need to continue to provide consultations and to expand the range of legal aid for service members, both male and female.

For NAKO, it is especially important to support female and male veterans and their families in the context of the full-scale war. When we understand what legal problems and needs they face, we strive to analyse these problems and, together with the UVF, offer systemic solutions.

 **Over 1500** calls
from veterans and their families

Most frequently asked questions:

-  How can I get a one-time financial assistance in case of the death of a family member in combat?
-  What benefits are available and how to get them for family members killed in action?
-  How to pass a military and medical commission?
-  How do I get the status of a combatant?
-  How to search for family members who went missing or are in captivity in Russia?

Forming a positive image of a veteran



Presentation of the veterans' policy concept "Dignity and Respect," conducted by the Ukrainian Veterans Foundation in cooperation with the Independent Anti-Corruption Commission (NAKO), Kyiv, April 5, 2023

In 2023, NAKO and the UVF jointly implemented the Respect **communication campaign**, which presented the Dignity and Respect strategic concept for interacting with veterans. The concept's purpose is to protect former military personnel and their families from discrimination when receiving public or commercial services.

In spring 2023, NAKO supported the **photo project** "[Veterans are different. One Victory](#)" by former soldier Dmytro "Orest" Kozat-skyi. This was the artist's first project after his time in Russian captivity. He used his photographs to remind us of **respect, non-discrimination, and equality among defenders**. Famous veterans Olga Benda, Nariman Bilyalov, Oleksandr Budko, Eva Reuter, and

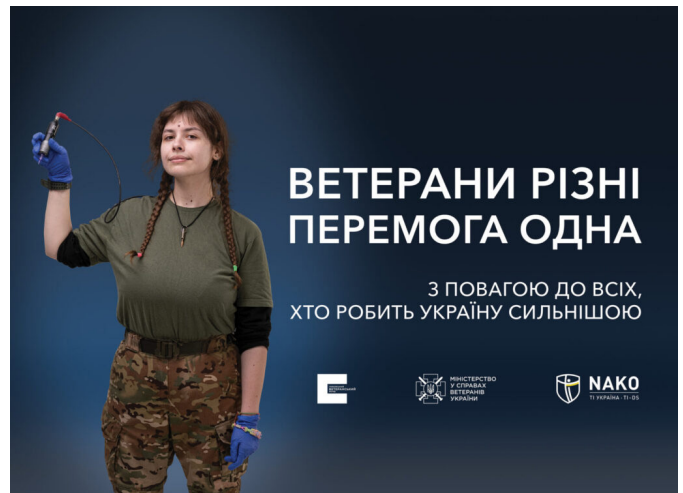
Roman Kulyk participated in the campaign. Social advertising was placed in seven cities: Chernihiv, Dnipro, Kherson, Kyiv, Lviv, Odesa, and Vinnytsia.

In 2023, in cooperation with the Ukrainian Foundation and Censor.net YouTube channel, NAKO launched the joint communication project "NATO to the House" about how Ukraine can get closer to NATO standards now, even before the war is over. As part of the project, host and blogger Maryna Danyliuk-Yarmolaieva discussed with guests (veterans and experts) on a weekly basis how to improve governance in the security and defence sector to make it more honest and meet today's challenges. One of the program's key focuses was a discussion on improving the protection of

Dmytro Kozatskyi's
photo project "Veterans
are different.
One Victory" in 7 cities



31 issues of the NATO to the
House project with a total
audience of almost
655 thousands
of people



the rights of military personnel and veterans, both men and women. Program guests included Liudmyla Dolhovnenska, former Strategic Communications Advisor to the Commander-in-Chief of the Armed Forces of Ukraine Valeriy Zaluzhnyi; Akhtem Seitablaev, actor, director and military service member; Natalia Kalmykova, UVF Director; and many others. Since its inception, the project has broadcast 31 programs with a total audience of almost 655,000 people.

The UVF is very positive about the results of cooperation with NAKO:



“Each campaign created jointly with NAKO was reinforced by the Ukrainian Veterans Fund’s communications team by creating texts with project participants, distributing UVF management and analytical columns to national media, organizing events and TV and radio broadcasts. We sincerely thank our partners for their support and assistance in implementing these projects. We also strive to expand our joint portfolio of projects and bring even more social benefits to veterans and their families.”



Ruslana Velychko-Trifoniuk,
acting executive director of the Ukrainian Veterans Fund



The program, “NATO in House,” features Yulia Paievska, also known as “Taira,” a paramedic and veteran. It is a joint project of NAKO and the media Censor.Net.



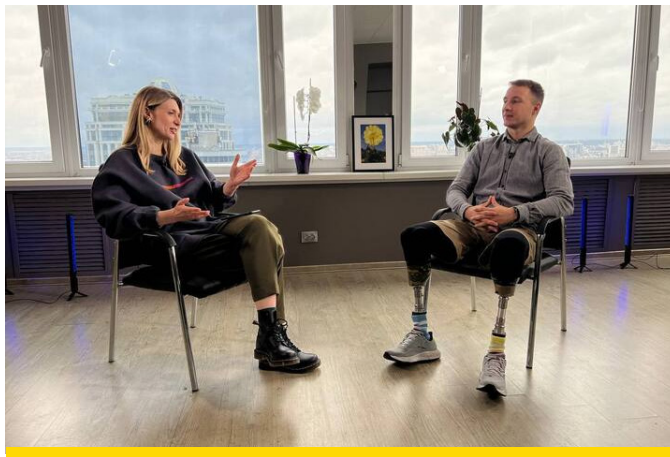
The program “NATO in House” features Oleksandr Niman, an Israeli veteran who volunteered to fight in Ukraine. It is a joint project of NAKO and the media Censor.Net.



The program "NATO in House" features Akhtem Seitablaiev, an actor, director, and serviceman in the Territorial Defense Forces of the Armed Forces of Ukraine. It is a joint project of NAKO and the media Censor.Net.



The program "NATO in House" features Olena Tregub, Executive Director of the Independent Anti-Corruption Commission (NAKO). The program is a joint project of NAKO and the media Censor.Net.



The program "NATO in House" features Oleksandr Budko, also known as "Teren," a veteran and participant in the "Invictus Games." The program is a joint project of NAKO and the media Censor.Net



The program "NATO in House" features Oleksandr Zhuhan, also known as "Yenot," a veteran and representative of the LGBTQ+ community. The program is a joint project of NAKO and the media Censor.Net.



The program "NATO in House" features Lyubomyr Mysiv, Deputy Director of the sociological group "Rating." The program is a joint project of NAKO and the media Censor.Net.



The program "NATO in House" features Yuliya Kirillova, a veteran and head of the Training and Analytical Work Department of the Ukrainian Veterans Fund under the Ministry of Veterans Affairs. The program is a joint project of NAKO and the media Censor.Net.



GOAL 5:

PROMOTE SANCTIONS AGAINST RUSSIA'S DEFENCE INDUSTRY TO REDUCE THE AGGRESSOR'S MILITARY POTENTIAL

3



analytical reports

1



analytical note

18

Russian arms manufacturers, for which NAKO submitted relevant materials, in the 12th and 13th sanctions packages



Since Russia's full-scale invasion, **NAKO has consistently supported the NACP in promoting anti-Russian sanctions.** These sanctions are aimed at preventing the supply of Western components for Russian weapons or, in other words, limiting Russia's ability to produce new weapons.

In particular, in 2023, NAKO co-authored a series of analytical reports:

- [“Enabling War Crimes? Western-Made Components in Russia's War Against Ukraine”](#);
- [“Terror in the Details: Western-made Components in Russia's Shahed-136 Attacks”](#);
- [“Globalization, Weaponized: Foreign Components in Weapons and Equipment Used by the Russian Army”](#).

NAKO also released the policy brief [“Inconsistency In Action: A Case of Sanctioning the Russian Military Industry”](#), which emphasizes that Western countries' sanctions against Russia's military-industrial complex are in-

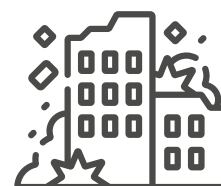
consistent.

The report **“Enabling War Crimes? Western-Made Components in Russia's War Against Ukraine”**, prepared jointly with International Partnership for Human Rights (IPHR), examines dual-use components (those not intended for the military sector but that it can use) produced in the West and Russia uses in missiles. The first section of the report examines **war crimes allegedly committed by Russia in Ukraine**. The second section describes in detail **the Western components in Russian missiles**. The third section is about **the supply chain of Western-made components to Russia**. The experts investigated 10 massive attacks on Ukrainian cities that killed 70 people in 2022: on Vinnytsia in July, Kharkiv in August, and the shelling of Kyiv in

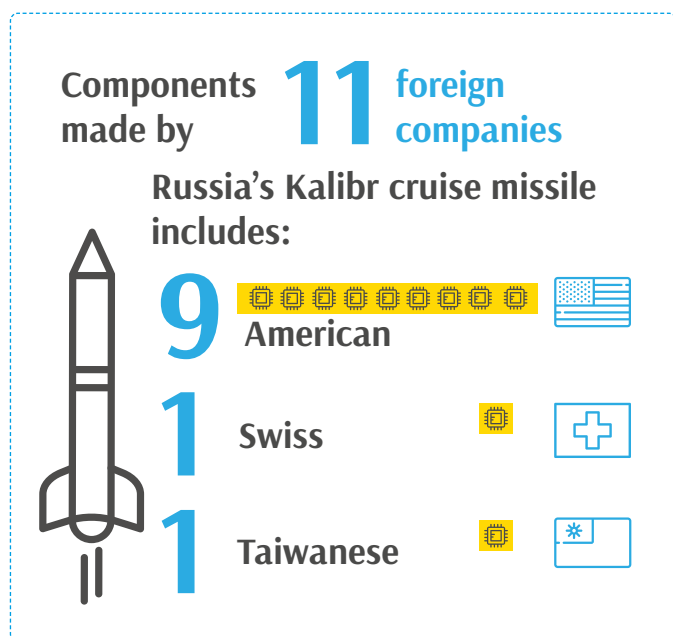
10

massive attacks

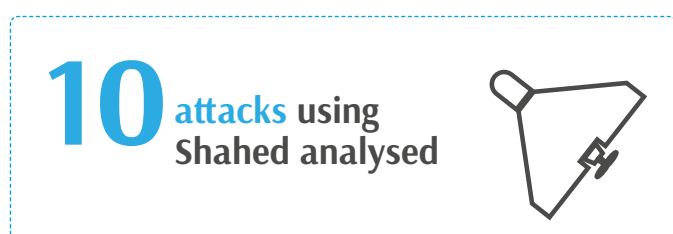
on Ukrainian cities investigated by experts



October. According to NAKO, **Russian Kalibr cruise missiles included components manufactured by 11 foreign companies: nine American, one Swiss, and one Taiwanese.**



The study **“Terror in the Details: Western-made Components in Russia’s Shahed-136 Attacks”** was prepared jointly by IPHR, Truth Hounds, and [Global Diligence LLP](#). It analyses 10 attacks that used Shaheds and damaged residential buildings, power plants, businesses, a school, and a children’s summer camp. The report states that Russian Shahed-136 attacks deliberately target civilians and infrastructure, with no tangible military advantage gained from the attacks.



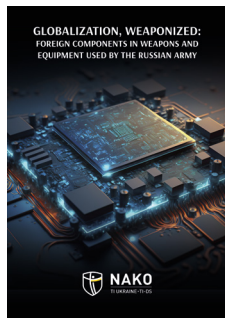
The report also analyses the numerous Shahed-136 fuselages that Russia used in Ukraine. They contained a variety of components manufactured by American, Japanese,

Canadian, and Swiss companies, ranging from microprocessors and semiconductors to Ethernet transceivers and memory. The report emphasizes the Russian army’s reliance on Western-made components in its war against Ukraine and the urgent need to limit further supplies of such components.

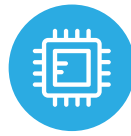
All of these analyses contain a number of recommendations, including further sanctions and embargoes, tighter export controls, due diligence on companies producing international components, and increased diplomatic efforts to examine the supply chains of Western components.

Based on these findings, NAKO provided recommendations, expertise, and technical support to the NACP to ensure that the government of Ukraine has access to relevant data that can help further advance sanctions and harmonize restrictions across jurisdictions. In terms of research, NAKO also cooperated with IPHR and its partners, and in terms of advocating for the recommendations in the international arena, with Business for Ukraine, The International Working Group on Russian Sanctions, and leading global media. As a result of these efforts, the European Commission included 27 Russian arms manufacturers, for which NAKO submitted relevant materials, in the 9th package of sanctions. Following NAKO’s recommendation, a number of Russian defence companies were also included in the European Commission’s 10th sanctions package. In March 2023, the United Kingdom (UK) imposed sanctions against five Russian arms manufacturers from the list NAKO prepared for the NACP.

In July 2023, NAKO Executive Director Olena Tregub testified before the U.S. Congress during a hearing of the Commission on Security



Study “Globalization, Weaponized: Foreign Components in Weapons and Equipment Used by the Russian Army”



More than **400** components

from 23 samples of Russian weapons and equipment were analyzed. In particular, the Ka-52 Alligator combat helicopter, Kalibr and X-101 missiles, etc.

and Cooperation in Europe (also known as the U.S. Helsinki Commission) on “Russian Alpine Assets: Money Laundering and Sanctions Evasion in Switzerland.” She informed the U.S. Congress about the results of a NAKO study that analysed 22 pieces of Russian weapons and military equipment. NAKO found that semi-conductors produced by Swiss companies were found in numerous systems used by the Russian army, including the Kalibr mis-

sile, Ka52 Alligator combat helicopter, X-101 missile, Corsair, Orlan, Shahed-136 reconnaissance, and weaponized UAVs. NAKO believes that such research and advocacy work is our fair contribution to stopping Russia’s military machine.

The NACP highly appreciated NAKO’s analytical and advocacy work to promote sanctions against the Russian defence industry.



“We engaged NAKO experts in the preparation of certain analytical materials related to the promotion of sanctions against Russia. The agency appreciated the experience of the specialists involved, their level of expertise and willingness to effectively perform non-standard tasks. They are also flexible and can quickly transform their approaches, which is especially important in a rapidly changing situation on the battlefield.”



Agiya Zahrebelska,

Head of Corruption Risk Mitigation
in the NACP’s Sanctions Policy

INTERNATIONAL ADVOCACY AND COMMUNICATION IN THE CONTEXT OF RUSSIA'S FULL-SCALE WAR AGAINST UKRAINE

Throughout the year, NAKO team members carried out a number of advocacy activities, mainly speeches at international conferences and meetings with high-ranking officials of Ukraine's partner countries around the world, introducing the organization's achievements to the global community and calling for strong international support for Ukraine.

Olena Tregub's speech at the U.S. Helsinki Commission hearing



In July 2023, NAKO Executive Director Olena Tregub [testified](#) in the U.S. Congress during the U.S. Helsinki Commission's hearing "Russia's Alpine Assets: Money Laundering and Sanctions Evasion in Switzerland." She emphasized that Switzerland's policy toward Ukraine does not look neutral, as while limiting arms to Ukraine, its government overlooks Russian assets, helps Russians launder mon-



ey, and does not help stop the supply of components to Russia through third countries. Tregub called for initiating an international investigation into Swiss banks involved in the laundering of Russian funds. She suggested that the United States consider imposing sanctions on those banks, financial institutions in Switzerland, and other Russian legal entities that are sheltered by Swiss jurisdiction.



INTERNATIONAL ADVOCACY AND COMMUNICATION



Svitlana Musiyaka met with the U.S. Secretary of State

In September 2023, in Kyiv, NAKO's Head of Research and Policy Development Svitlana Musiyaka [took part](#) in a closed-door meeting with U.S. Secretary of State Anthony Blinken and civil society representatives. Musiyaka emphasized the role of civil society in security and defence sector reform, in particular in fighting corruption.

Olena Tregub's speech at the Warsaw Security Forum



In October 2023, NAKO Executive Director Olena Tregub spoke at the Warsaw Security Forum, where she [called](#) for tougher sanctions against the Russian military-industrial complex and a halt to the supply of Western-made components for Russian weapons. In particular, she called for coordinating efforts with the United States, Switzerland, and Germany.

NAKO advocacy visit to the Paris Peace Forum



In November 2023, NAKO Executive Director Olena Tregub [attended](#) the Paris Peace Forum 2023. As part of the event, she had a series of advocacy meetings with international partners: European Commission representatives and politicians from European countries, in particular, with the Director of the EU Foreign Policy Instruments Service Peter Wagner. During the meetings, they discussed strengthening sanctions against Russia.

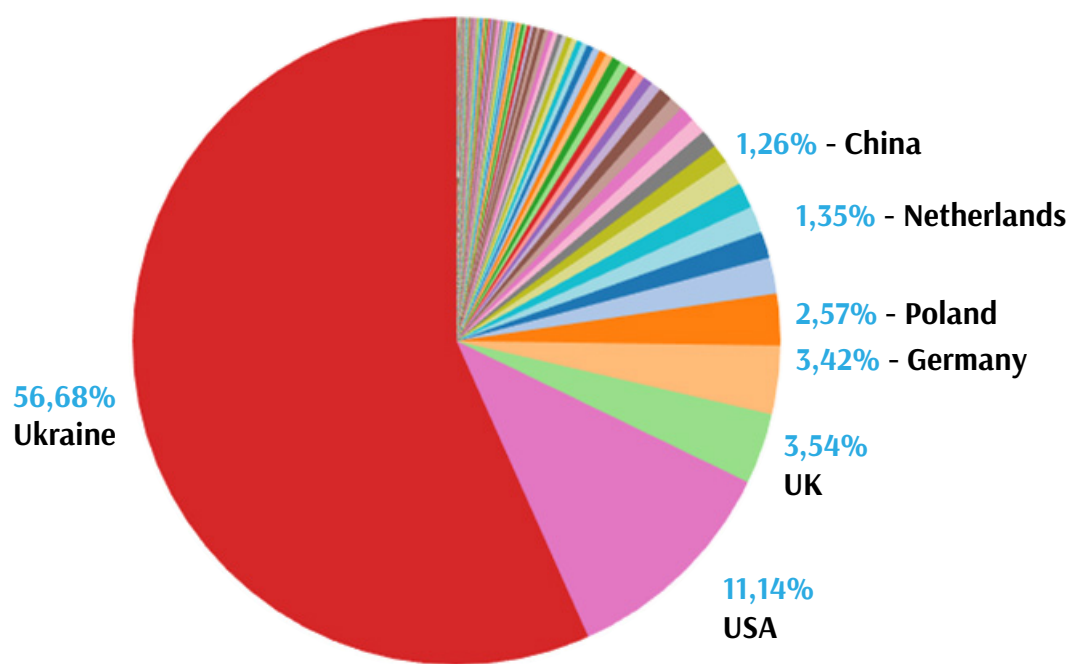
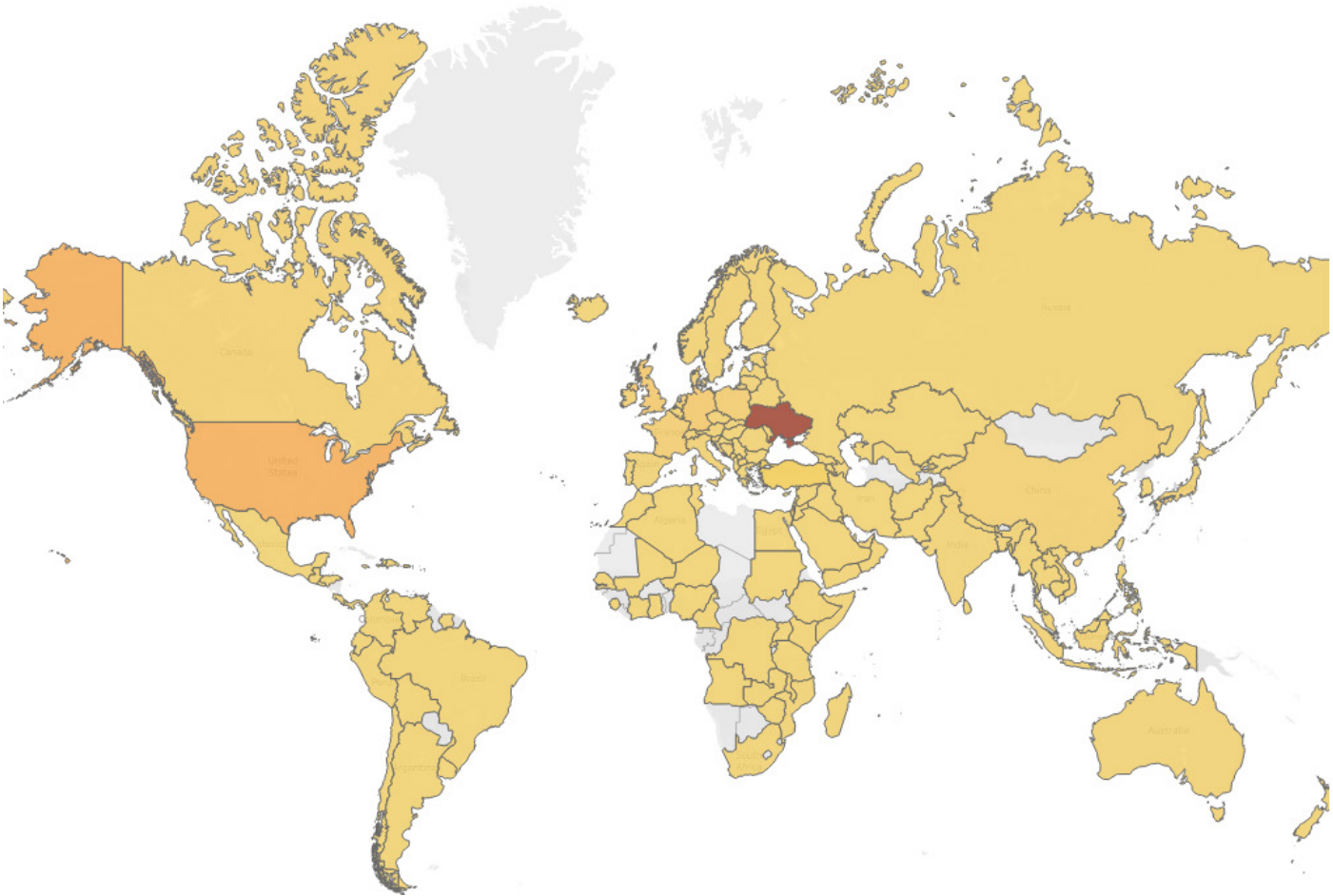


INTERNATIONAL ADVOCACY AND COMMUNICATION



COMMUNICATIONS

- More than 20,000 visitors to the NAKO website from 146 countries;





• **The 31st issue of “[NATO in the House](#)”,** a joint project by NAKO, the UVF, and Censor.NET YouTube channel about the needs of veterans



• **19 columns by NAKO team members for the Ukrainian press,** including Liga.NET, Ukrayinska Pravda, Ekonomichna Pravda, Dzerkalo Tyzhnia, Censor.NET



• **17 interviews for international and Ukrainian TV channels,** radio, and publications, including the [Financial Times](#), [Voice of America](#), French TV channel [France 24](#), Italian publications Linkiesta and A Referencia, Indian TV channels [WION](#) and NDTV, Ukrainian Radio, Radio NV, and Censor.NET



• **9 commentaries for foreign and Ukrainian publications,** such as the Japanese edition of [Sankei News](#), [Voice of America](#), Indian TV channel WION, and Swiss edition of [Handelszeitung](#)

NAKO in the media



2023
year

- **February** NAKO Executive Director Olena Tregub wrote an op-ed for the Financial Times calling on Western governments to close the loopholes that allow Western weapons components to reach Russia.
- **March** NAKO Executive Director Olena Tregub commented to the Italian edition of [A Referencia](#) on Russia's dependence on Western technologies and components used to produce military equipment, aircraft, missiles, etc. She explained that restricting access to Western technology would have a devastating impact on Russia's military operations.
- **March** NAKO Executive Director Olena Tregub spoke at the [Atlantic Council](#) online discussion, “How to prevent Western components from being incorporated into Russian weapons?”
- **April** NAKO Head of Research and Policy Development Svitlana Musiyaka wrote a column for [Liga.net](#) that the reform of the state defence concern Ukroboronprom is again being slowed down.
- **April** NAKO Executive Director Olena Tregub called for immediate reform of the UN in order to unite the efforts of the whole world in support of Ukraine on the Indian TV channel [WION](#).



2023
year

April

In a commentary for [Voice of America](#), NAKO Executive Director Olena Tregub explained how to prevent the use of Western technologies in the production of Russian weapons.

May

In a commentary for [Liga.net](#), NAKO Executive Director Olena Tregub explained that the slowdown in reforming Ukroboronprom was destroying its infrastructure, devaluing its property, and preventing investment inflows.

June

NAKO Executive Director Olena Tregub explained in an interview with [Ukrainian Radio](#) the important role of the newly appointed head of Ukroboronprom in transforming the state defence concern.

June

NAKO Head of Research and Policy Development Svitlana Musiyaka explained on [Radio NV](#) that after reforming Ukroboronprom, the supervisory board of the newly created joint-stock company should follow international governance standards.

June

NAKO Executive Director Olena Tregub commented on the reform of Ukroboronprom live on [Radio NV](#), in particular, on the fact that there is a lack of professional and honest top management in the defence industry, so managers from other industries are heading Ukroboronprom.

July

NAKO Head of Research and Policy Development Svitlana Musiyaka gave commentary to the Japanese edition of The [Sankei news](#), in which she emphasized that corruption in the defence sector could ultimately negatively affect Western partners' support for Ukraine, so Ukraine must clearly demonstrate that the fight against it is effective.

July

NAKO Executive Director Olena Tregub on the [Voice of America](#) called on Western governments and companies producing components for Russian weapons to ensure strict export controls over export goods.

August

NAKO Executive Director Olena Tregub in a commentary for the [Swiss newspaper Handelszeitung](#) criticized the fact that the supply of Swiss technology for the manufacture of drones and missiles to Russia is growing significantly, while arms supplies to Ukraine are banned.



2023
year

- August

NAKO published a column on [Censor.NET](#) about defence procurement during war.

- August

NAKO published a column for [Censor.NET](#) stating that the management of the largest Russian tank manufacturer, Uralvagonzavod, remains outside sanctions.

- September

NAKO Executive Director Olena Tregub told [Radio NV](#) live that implementing changes in the MoD requires comprehensive government efforts and civil society control.

- November

NAKO [commented](#) for the Italian newspaper Linkiesta on how the Kremlin circumvents Western sanctions by buying Western technology.

- December

NAKO Executive Director Olena Tregub spoke live on [France 24](#) about Ukraine's progress on key anti-corruption reforms during the full-scale invasion.

- July

NAKO Head of Research and Policy Development Svitlana Musiyaka gave commentary to the Japanese edition of The Sankei news, in which she emphasized that corruption in the defence sector could ultimately negatively affect Western partners' support for Ukraine, so Ukraine must clearly demonstrate that the fight against it is effective.

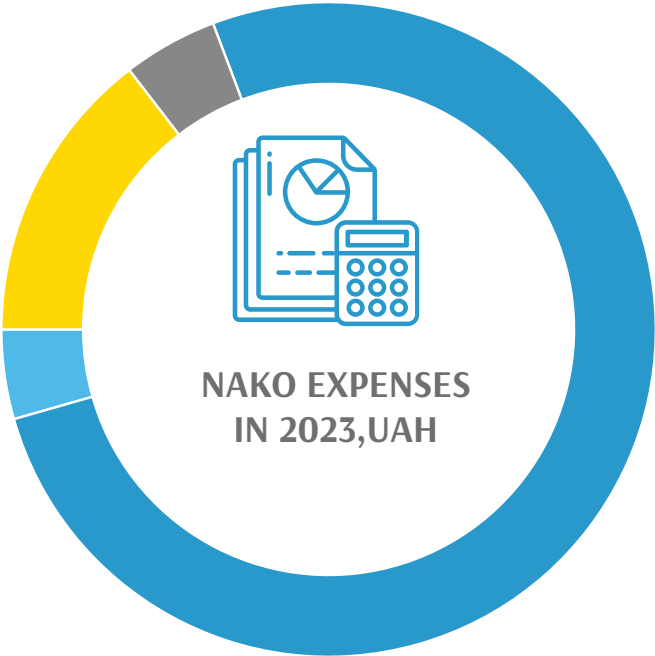
During 2023, Censor.NET published four columns by NAKO Head of Communications Emiliia Dieniezhna about [veterans](#), [women in the Armed Forces](#), [corruption in the defence sector](#), and [foreign components in Russian weapons](#).

FINANCIAL STATEMENT

984,635.90
Administrative expenses
and office rent

3,246,225.75
Research and analytics,
publications and
communication

1,042,777.28
Project activities and
advocacy



17,005,281.51
Salaries for the team
and consultants



NAKO INCOME IN 2023


**Foreign, Commonwealth
& Development Office**

438,387.31 GBP
Foreign, Commonwealth & Development Office
(FCDO)

 **INTERNATIONAL
RENAISSANCE
FOUNDATION**

1,022,265.04 UAH
International Renaissance
Foundation (IRF)

ORGANIZATION CHART



**NAKO
team**



Olena Tregub
Executive Director



Svitlana Musiyaka
Head of Research and
Policy



Emiliia Dieniezhna
Head of Communications
and Advocacy



Anatolii Iahin
Head of Operations



Anna Kashuk
Communications
Specialist



Viktoriia Vyshnivska
Senior Researcher



Nina Rakhylchuk
Accountant



Vladyslav Halytsky
Project Manager

DONORS AND PARTNERS

In 2022, NAKO activities were supported by the UK Foreign, Commonwealth & Development Office through the Office of the Special Defence Adviser at the British Embassy Kyiv and the International Renaissance Fund.



Foreign, Commonwealth
& Development Office



INTERNATIONAL
RENAISSANCE
FOUNDATION



NAKO
TI UKRAINE • TI-DS

2023
ANNUAL REPORT

INDEPENDENT ANTI-CORRUPTION COMMISSION

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