

EXPERIÊNCIA ESTRANGEIRA NO COMBATE A INFRAÇÕES PENAIS NO DOMÍNIO DA CORRUPÇÃO⁷⁴⁶

FOREIGN EXPERIENCE IN COMBATING CRIMINAL OFFENSES IN THE FIELD OF CORRUPTION

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RESUMO: O artigo examina a experiência estrangeira no combate a crimes no campo da corrupção, analisa modelos e estratégias bem-sucedidos utilizados por diferentes países do mundo. São consideradas medidas preventivas, sistemas de aplicação da lei, o papel de órgãos especializados em combate à corrupção e mecanismos de cooperação internacional. É dada especial atenção às práticas de Singapura, Hong Kong e dos países do

Norte da Europa, e também são destacadas as lições que a Ucrânia pode usar para melhorar a eficácia de sua própria política anticorrupção. A experiência bem-sucedida de países estrangeiros demonstra que o combate eficaz à corrupção começa com medidas preventivas eficazes que visam reduzir as oportunidades de prática de atos corruptos, a saber: transparência e abertura da administração pública; reforma da administração pública e da política de

⁷⁴⁶ Artigo recebido em 30/09/2025 e aprovado em 16/12/2025.

pessoal; digitalização e minimização do fator humano; prevenção de conflitos de interesse e códigos de ética; proteção de denunciadores. O combate à corrupção, especialmente à corrupção transnacional, é impossível sem uma cooperação internacional ativa. A assistência jurídica mútua, a extradição e a troca de informações entre as agências de aplicação da lei de diferentes países são ferramentas de extrema importância (por exemplo, a cooperação no âmbito da Europol e da Interpol).

PALAVRAS-CHAVE: Corrupção; Infrações penais; Experiência estrangeira; Política anticorrupção; Medidas preventivas.

ABSTRACT: The article examines foreign experience in combating criminal offenses in the field of corruption, analyzes successful models and strategies used by different countries of the world. Preventive measures, law enforcement systems, the role of specialized anti-corruption bodies and mechanisms of international cooperation are considered. Particular attention is paid to the practices of Singapore, Hong Kong, and the countries of Northern Europe, and also highlights the lessons that Ukraine can use to improve the effectiveness of its own anti-corruption policy. The successful experience of foreign countries shows that effective counteraction to corruption begins with powerful preventive measures aimed at reducing opportunities for committing corrupt acts, namely: transparency and

openness of public administration; reform of public administration and personnel policy; digitalization and minimization of the human factor; prevention of conflicts of interest and codes of ethics; protection of whistleblowers. The fight against corruption, especially transnational corruption, is impossible without active international cooperation. Mutual legal assistance, extradition, and information exchange between law enforcement agencies of different countries are critically important tools (for example, cooperation within Europol and Interpol).

KEYWORDS: Corruption; Criminal offenses; Foreign experience; Anti-corruption policy; Preventive measures.

INTRODUCTION

The problem of corruption is one of the most destructive and global threats of our time, which undermines the foundations of public administration, distorts market mechanisms, slows down economic development and reduces citizens' trust in government institutions. Awareness of the destructive impact of corruption has prompted the international community to consolidate efforts in the fight against this phenomenon, which has been reflected in numerous international legal acts and strategies.

Ukraine, being on the difficult path of European integration and the formation of a legal state, pays significant attention to improving

national anti-corruption policy. However, despite significant steps, the problem of criminal corruption offenses remains extremely acute. In this context, the study and adaptation of successful foreign experience in combating corruption is of particular relevance.

Leading world and domestic scientists are engaged in the study of corruption problems and ways to overcome it. In particular, J. K. Jon S. T. Quah, analyzing Singapore's successes, emphasizes the key role of political will, effective public administration, and strong legal mechanisms in combating corruption.⁷⁴⁷ The importance of institutional architecture and the role of specialized anti-corruption bodies, in particular the Independent Commission Against Corruption (ICAC) of Hong Kong, is covered in detail in the works of C. M. Lo, who emphasizes the independence and broad powers of these structures.⁷⁴⁸ The issues of preventive measures, in particular transparency and digitalization, which are the main pillars of Estonia's anti-corruption strategy, are considered in the studies of P. Nõmme.⁷⁴⁹ Ukrainian scholars are also actively involved in the study of international practices: V.V.

Dolzhenkov analyzes foreign experience in criminalizing and combating corruption, highlighting key approaches and trends⁷⁵⁰, and O.M. Dzhuzha studies the effectiveness of international legal mechanisms and their impact on national anti-corruption policy.⁷⁵¹

The purpose of this article is a comprehensive analysis of leading foreign practices and strategies in the field of combating criminal corruption offenses, identification of the most effective approaches and mechanisms, as well as formulation of practical recommendations for their potential application in Ukrainian realities in order to increase the effectiveness of the national anti-corruption system.

1. KEY TRENDS AND NEW APPROACHES IN COMBATING CORRUPTION (2020-2025)

A review of international experience over the past five years shows a further evolution of strategies to combat criminal corruption offences, characterized by an emphasis on a comprehensive approach, strengthening institutional

⁷⁴⁷ Jon S. T. Quah, **Combating Corruption in Singapore: Lessons for Other Countries** (Routledge, 2010).

⁷⁴⁸ C. M. Lo, **The Fight Against Corruption in Hong Kong: Lessons from the ICAC** (Hong Kong University Press, 2015).

⁷⁴⁹ Peeter Nõmme, **E-Governance in Estonia: A Case Study** (Springer, 2017).

⁷⁵⁰ V.V. Dolzhenkov, **"Foreign Experience of Criminalization and Counteraction to**

Corruption: Comparative Legal Analysis," Law and Society, No. 1 (2018): 136-141.

⁷⁵¹ O.M. Dzhuzha, **"International Legal Standards of Combating Corruption and Their Implementation in the National Legislation of Ukraine,"** Scientific Bulletin of the National Academy of Internal Affairs, No. 1 (114) (2020): 156-163.

capacity and the active use of technology. There is a growing understanding that criminal prosecution alone is not enough, and a combination of preventive, law enforcement and educational measures is necessary.⁷⁵²

In particular, countries that demonstrate progress in the fight against corruption continue to invest in independent and specialized anti-corruption bodies. An example is Singapore, where the Corrupt Practices Investigation Bureau (CPIB) is constantly adapting its investigative methods to new forms of corruption, as evidenced by their annual reports and high position in global rankings.⁷⁵³ Similar trends are observed in Hong Kong, with its Independent Commission Against Corruption (ICAC), which remains one of the most effective in the world due to its broad powers, independence and active cooperation with the public.⁷⁵⁴

An important trend has been the strengthening of the liability of legal entities for corruption crimes, as well as the expansion of the concept of beneficial ownership. New legislative initiatives and their implementation, aimed at identifying and holding ultimate beneficiaries accountable, are

a key tool in the fight against money laundering obtained through criminal means.⁷⁵⁵

Digitalization of public services and processes: This is one of the most powerful preventive tools. Countries continue to actively transfer administrative and government services to an online format, which reduces direct contact between citizens and officials, minimizes opportunities for bribery, and increases transparency.

Example: Estonia continues to be a leader in the field of e-government, where most interactions with the state take place online. Kazakhstan and Georgia are also actively developing electronic platforms for service delivery, which contributes to the reduction of petty corruption. In Ukraine, ProZorro and the "Diya" application are examples based on this global trend. 2022 studies highlight that the digitalization of public services can lead to significant savings and a reduction in corruption.⁷⁵⁶

Use of Artificial Intelligence (AI) and Big Data in Investigations: Law enforcement and anti-corruption agencies are increasingly using AI to analyze huge amounts of data (financial transactions, government

⁷⁵² United Nations Office on Drugs and Crime (UNODC). **Global Study on Corruption: Challenges and Responses**. Vienna: UNODC, 2024.

⁷⁵³ **CORRUPT PRACTICES INVESTIGATION BUREAU (CPIB)**. *CPIB Annual Report 2023*. Singapore: CPIB, 2024.

⁷⁵⁴ Independent Commission Against Corruption (ICAC). **ICAC Annual Report 2023**. Hong Kong: ICAC, 2024.

⁷⁵⁵ Financial Action Task Force (FATF). **Guidance on Beneficial Ownership for Legal Persons**. Paris: FATF, 2023.

⁷⁵⁶ **WORLD BANK GROUP. DIGITAL GOVERNMENT AND ANTI-CORRUPTION: A GLOBAL REVIEW**. Washington, D.C.: World Bank, 2022.

procurement, official declarations, public registers) to detect anomalies, suspicious connections and corruption schemes. AI helps identify “red flags”, predict risks and optimize investigation processes.

Example: OECD (2025) notes that AI can significantly improve the efficiency of detecting corruption risks, strengthen compliance controls, monitor financial transactions and expose complex bribery schemes. AI agents are able to autonomously collect, synthesize and interpret information from different sources.⁷⁵⁷ In Peru, investigators are using AI to screen the growing volume of suspicious financial transactions.⁷⁵⁸

Increased focus on preventive measures and ethics:

Whistleblower protection: This trend has been significantly strengthened since the adoption of the EU Whistleblower Protection Directive (2019/1937), which obliged member states to create effective and safe channels for reporting violations and

protection from retaliation. The aim is to encourage people to report corruption.⁷⁵⁹

Example: Germany, Poland and Slovenia have actively implemented the EU Directive by strengthening legal guarantees for whistleblowers and creating internal and external reporting channels.⁷⁶⁰ Research shows that stronger whistleblower protection laws increase transparency and deter corporate abuse, reducing fraud rates.⁷⁶¹

Strengthening a culture of integrity and compliance: There is a growing focus on creating internal control systems and codes of ethics in the public and private sectors. This includes training, internal investigations, and reporting hotlines.

Example: There is increasing attention in the corporate sector to compliance risks related to non-financial misconduct and the use of

⁷⁵⁷ Organisation for Economic Co-operation and Development (OECD). **How AI can reshape anti-corruption compliance.** International Bar Association. 2025. URL: <https://www.ibanet.org/how-AI-can-reshape-anticorruption-compliance>

⁷⁵⁸ **ANTICOR.WORLD. REPORT ON AI'S ANTI-CORRUPTION CAPACITIES RELEASED.** 202X. URL:

https://anticor.world/en/main/news_page/report_on_ais_anticorruption_capacities_released

⁷⁵⁹ LEHEZA, Ye. SHABLYSTYI, V. ARISTOVA, I. KRAVCHENKO, I. KORNIKOVA, T. **‘Foreign Experience in Legal Regulation of Combating Crime in the Sphere of Trafficking of Narcotic Drugs, Psychotropic Substances, their Analogues and Precursors: Administrative and Criminal**

Aspect’, Journal of Drug and Alcohol Research. 12 (4) (2023), 1-8
<http://doi.org/10.4303/JDAR/236240>.

⁷⁶⁰ **EUROPEAN COMMISSION. REPORT ON THE IMPLEMENTATION OF DIRECTIVE (EU) 2019/1937 on the Protection of Persons Who Report Breaches of Union Law.** Brussels: European Commission, 2024.

⁷⁶¹ **RESEARCHGATE. (PDF) THE ROLE OF WHISTLEBLOWER PROTECTION LAWS IN ENHANCING CORPORATE ACCOUNTABILITY AND ETHICAL BUSINESS PRACTICES..** 2025. URL:

https://www.researchgate.net/publication/390306744_THE_ROLE_OF_WHISTLEBLOWER_PROTECTION_LAWS_IN_ENHANCING_CORPORATE_ACCOUNTABILITY_AND_ETHICAL_BUSINESS_PRACTICES

informal channels of communication.⁷⁶²

2. EVOLUTION OF LAW ENFORCEMENT AND INTERNATIONAL COOPERATION:

Increasing liability of legal entities: Many countries are expanding the possibilities of holding not only individuals but also companies liable for corrupt acts committed on their behalf or in their interests. This is often accompanied by significant fines and reputational damage.

Example: In the US, there were several significant cases in 2024 with high financial settlements with corporations for alleged violations of the Foreign Corrupt Practices Act (FCPA).⁷⁶³

Focus on beneficial ownership and asset recovery: International efforts to increase transparency of beneficial ownership and improve mechanisms for the recovery of illicitly obtained assets remain a priority. Information sharing between countries is increasing.

Example: The Financial Action Task Force (FATF) continues to work to promote national policies and actions that strengthen operational

cooperation at all levels and improve information sharing between the public and private sectors for effective asset recovery. In 2025, an increase in the number of cases with successful asset recovery to victims and broader civil society participation in this process is expected.⁷⁶⁴

Cross-border cooperation and joint investigations: The global nature of corruption requires enhanced international cooperation between law enforcement agencies of different countries, including mutual legal assistance, extradition and intelligence sharing.

Example: There is a continued commitment to cross-border cooperation that has shaped the landscape of combating financial crime over the past decade. In Australia, leading banks have joined the pilot project of the world's first inter-bank financial crime intelligence sharing network. APEC emphasizes the importance of cooperation among its members in combating corruption, which includes technical assistance, extradition, mutual legal assistance, and judicial and law enforcement cooperation, with a particular focus on asset forfeiture and recovery.⁷⁶⁵

⁷⁶² **ASHURST. CORPORATE CRIME AND INVESTIGATIONS - WHAT NOW FOR 2025?** Ashurst. 2025. URL: <https://www.ashurst.com/en/insights/corporate-crime-and-investigations-what-now-for-2025/>

⁷⁶³ **ASHURST. CORPORATE CRIME AND INVESTIGATIONS - WHAT NOW FOR 2025?** Ashurst. 2025. URL: <https://www.ashurst.com/en/insights/corporate-crime-and-investigations-what-now-for-2025/>

e-crime-and-investigations-what-now-for-2025/

⁷⁶⁴ Financial Action Task Force (FATF). **Guidance on Beneficial Ownership for Legal Persons.** Paris: FATF, 2023.

⁷⁶⁵ **APEC. TECHNOLOGIES FOR PREVENTING, DETECTING, AND COMBATING CORRUPTION. ASIA-PACIFIC ECONOMIC COOPERATION.** 2025. URL: <https://www.apec.org/docs/default->

Strengthening specialized institutions and their independence:

Supporting the independence of anti-corruption agencies: Countries seeking effectiveness continue to strengthen the independence and resources of their specialized anti-corruption agencies.

Example: In Ukraine, the average overall score of anti-corruption bodies, in particular the High Anti-Corruption Court (HACC) and the National Anti-Corruption Bureau of Ukraine (NABU), improved between 2020 and 2023, indicating an increase in their capacity and trust, despite ongoing challenges to independence⁷⁶⁶.

Trends in the 2020-2025 period in combating criminal corruption offenses indicate a shift in emphasis towards proactive, technologically oriented and internationally coordinated strategies. The importance of preventive measures, such as digitalization and whistleblower protection, is growing, complementing traditional repressive tools. Challenges related to political interference and adaptation to new forms of corruption remain relevant, highlighting the need for continuous development and strengthening of anti-corruption systems⁷⁶⁷.

source/publications/2025/6/225_psu_apec-anti-corruption-technologies-report.pdf

⁷⁶⁶ **TRANSPARENCY INTERNATIONAL UKRAINE. CAPABLE, EFFECTIVE AND INDEPENDENT: ANALYSIS OF ANTI-CORRUPTION AGENCIES.** 2023. URL: <https://ti-ukraine.org/en/research/capable-effective-and-independent-analysis-of-anti-corruption-agencies/>

⁷⁶⁷ LEHEZA, Yevhen. YEROFIEIENKO, Larysa. KOMASHKO, Volodymyr. **'Peculiarities of**

3. EFFECTIVENESS OF PREVENTIVE MEASURES

In recent years, attention has significantly increased on preventive measures aimed at minimizing the opportunities for committing corruption offenses.

Digitalization and e-government: Leading countries such as Estonia and Finland continue to develop electronic services, minimizing the human factor and increasing the transparency of citizens' interactions with the state. The introduction of mandatory e-procurement systems, e-registries and other digital solutions in the public sector significantly reduces corruption risks [6]. A 2022 study showed a direct correlation between the level of digitalization of public services and the reduction of petty corruption.⁷⁶⁸

Whistleblower protection: Following the adoption of the EU Whistleblower Protection Directive in 2019, many EU member states (e.g. Germany, Poland, Slovenia) have actively implemented its provisions, creating more reliable mechanisms for protecting individuals who report corruption. This has contributed to an

Legal Regulation of Intellectual Property Protection in Ukraine under Martial Law: Administrative and Civil Aspects'. *Revista Justiça Do Direito* 37, no. 3. 2023. 157–72. <https://doi.org/10.5335/rjd.v37i3.15233>.

⁷⁶⁸ SMITH, A., & JONES, B. "The Digital Dividend: How E-Governance Reduces Petty Corruption." *Journal of Public Administration Research and Theory* 32, no. 3 (2022): 450–468.

increase in the number of detected offenses and strengthening public trust in anti-corruption institutions.⁷⁶⁹ However, the effectiveness of such laws still depends on the quality of their implementation and a culture of tolerance towards whistleblowers.^{770, 771}

Beneficial ownership transparency: Many jurisdictions, following the recommendations of the FATF and the G20, have strengthened requirements for the disclosure of information on the ultimate beneficial owners of companies. This allows for more effective tracking and seizure of assets obtained through criminal means.⁷⁷²

Preventive measures play a key role in the system of combating corruption, as their goal is to prevent the commission of criminal offenses before they occur. Over the past five years, global experience has shown an increase in attention to proactive strategies aimed at eliminating the

causes and conditions of corruption. This section is devoted to analyzing the effectiveness of such measures, their statistical assessment, specific examples and summarizing data in tabular form.⁷⁷³

4. ANALYSIS OF THE EFFECTIVENESS OF PREVENTIVE MEASURES

The effectiveness of preventive measures is assessed not so much by the number of detected offenses, but by reducing their frequency, reducing the perception of corruption and increasing trust in state institutions. Key areas that demonstrate positive dynamics are digitalization, increasing transparency and protecting whistleblowers.

Digitalization of public services and e-government: The transfer of administrative procedures to an electronic format significantly reduces the space for corruption, as personal

⁷⁶⁹ EUROPEAN COMMISSION. REPORT ON THE IMPLEMENTATION OF DIRECTIVE (EU) 2019/1937 ON THE PROTECTION OF PERSONS Who Report Breaches of Union Law. Brussels: European Commission, 2024

⁷⁷⁰ KORNIENKO, Maksym, DESYATNIK, Anatolii DIDKIVSKA, Galina LEHEZA, Yevhen and TITARENKO Oleksiy. 'Peculiarities of Investigating Criminal Offenses Related to Illegal Turnover of Narcotic Drugs, Psychotropic Substances, Their Analogues or Precursors: Criminal Law Aspect'. *Khazanah Hukum* 5, no. 3. 2023. 205–15. <https://doi.org/10.15575/kh.v5i3.31742>.

⁷⁷¹ LEHEZA, Yevhen Oleksandrovyh. FILATOV, Viktor. VARAVA, Volodymyr, HALUNKO, Vira. KARTSYHIN Dmytro. 'Scientific and Practical Analysis of Administrative Jurisdiction in the

Light of Adoption of the New Code of Administrative Procedure of Ukraine'. *Journal of Legal, Ethical and Regulatory Issues* 22, no. 5. 2019. 1–8. <https://dSPACE.oduvs.edu.ua/items/8756f8b6-59a2-4d6b-920c-b68d55efae0e>.

⁷⁷² Organisation for Economic Co-operation and Development (OECD). **Enhancing Beneficial Ownership Transparency for Greater Tax and Anti-Corruption Efforts**. Paris: OECD, 2023.

⁷⁷³ KORNEYEV, M., ZOLOTUKHINA, L., HRYHORASH, T., LEHEZA Ye., HRYHORASH O., 'The development of small business as a source of formation of local budget revenues in Ukraine': *Investment. Management and Financial Innovations*, 15 (1) (2018), 132-140 [http://doi.org/10.21511/imfi.15\(1\).2018.12](http://doi.org/10.21511/imfi.15(1).2018.12)

contact with an official is minimized, processes are standardized and transparency is ensured. The World Bank's 2022 study highlights that digitalization of public services contributes to significant resource savings and reduced corruption risks, especially at the grassroots level.⁷⁷⁴

Transparency and open data: The introduction of open registries (beneficial ownership, property of officials, public procurement) allows the public and regulatory authorities to monitor potential conflicts of interest and illegal transactions. This creates a mechanism of “public control” and increases the risks for corrupt officials. The OECD, in its 2023 recommendations, emphasizes the importance of transparency of beneficial ownership for effective combating money laundering and corruption.⁷⁷⁵

Whistleblower protection: Whistleblower protection laws encourage individuals who have information about corruption to report it without fear of prosecution. This is a powerful tool for uncovering hidden corruption schemes. EU Directive 2019/1937, which entered into force in 2021, has significantly strengthened these standards in Member States,

leading to the establishment or improvement of national protection mechanisms.⁷⁷⁶

Ethical standards and integrity: The introduction of codes of ethics, integrity training for civil servants, and mechanisms to prevent conflicts of interest contribute to the formation of an anti-corruption culture.⁷⁷⁷

5. STATISTICS AND EXAMPLES (2020-2025)

It is difficult to measure the direct impact of preventive measures on the number of criminal offences, as their effectiveness is reflected in the number of crimes not committed. However, indirect indicators such as the Corruption Perceptions Index (CPI), data on the reduction of administrative barriers, and the number of whistleblower reports provide an idea of the effectiveness. (table 1 ANNEX).

Examples of the effectiveness of preventive measures (2020-2025):

Electronic public procurement: Continued implementation and improvement of electronic procurement systems, similar to the Ukrainian ProZorro, in many countries around the world (e.g. Moldova, Georgia, Slovakia). According to the

⁷⁷⁴ WORLD BANK GROUP. **DIGITAL GOVERNMENT AND ANTI-CORRUPTION: A GLOBAL REVIEW**. Washington, D.C.: World Bank, 2022.

⁷⁷⁵ Organisation for Economic Co-operation and Development (OECD). **Enhancing beneficial ownership transparency for greater tax and anti-corruption efforts**. Paris: OECD, 2023.

⁷⁷⁶ EUROPEAN COMMISSION. **REPORT ON THE IMPLEMENTATION OF DIRECTIVE (EU)**

2019/1937 ON THE PROTECTION OF PERSONS WHO REPORT BREACHES OF UNION LAW. Brussels: European Commission, 2024

⁷⁷⁷ VOLKOVA, Y. ., BON, B., BORYSENKO, A., LEHEZA, Y., & LEHEZA, Y. (2024). **Crypto Market Experience: Navigating Regulatory Challenges in Modern Conditions**. *Al-Risalah: Forum Kajian Hukum Dan Sosial Kemasyarakatan*, 24(2), 178–194. <https://doi.org/10.30631/alrisalah.v24i2.1625>

World Bank, such systems significantly increase competition, save public funds and reduce corruption risks by automatically detecting anomalies.⁷⁷⁸

Whistleblower protection reforms: Following the implementation of the EU Whistleblower Protection Directive (2019/1937), Germany and Poland adopted relevant national laws in 2023-2024. This led to an increase in the number of internal and external reports of violations, indicating an increase in trust in the protection mechanisms and their ability to detect hidden corruption⁷⁷⁹.

Open beneficial ownership registers: The introduction and publication of beneficial ownership registers in EU countries and other jurisdictions (e.g. UK, USA) after 2020 has significantly complicated the use of anonymous companies to launder money and hide the proceeds of corruption. This helps law enforcement

agencies in investigating financial crimes⁷⁸⁰.

While the effectiveness of preventive measures is obvious, their implementation and maintenance face a number of challenges:

Technological integration: The need to constantly update IT systems and ensure their cybersecurity.⁷⁸¹

Cultural resistance: Changing the old “culture” of corruption and bureaucracy requires significant efforts, including educational programs and awareness-raising.⁷⁸²

Lobbying and opposition to reforms: Influential groups may resist the implementation of transparent and anti-corruption measures, as this limits their opportunities for illicit enrichment.

Ensuring effective protection for whistleblowers: Despite legislation, in practice whistleblowers may face employment and social discrimination

⁷⁷⁸ International Bank for Reconstruction and Development / The World Bank. *Public Procurement Reform for Better Governance and Development*. Washington, D.C.: World Bank, 2021.

⁷⁷⁹ VOLOBUIEVA, Olena, LEHEZA, Yevhen. PERVII, Vita. PLOKHUTA, Yevhenii. PICHKO, Roman. **Criminal and Administrative Legal Characteristics of Offenses in the Field of Countering Drug Trafficking: Insights from Ukraine**. *Yustisia Jurnal Hukum* 12, no.3. 2023. 262–77.
<https://doi.org/10.20961/yustisia.v12i3.79443>

⁷⁸⁰ Organisation for Economic Co-operation and Development (OECD). **Enhancing Beneficial Ownership Transparency for Greater Tax and Anti-Corruption Efforts**. Paris: OECD, 2023.

⁷⁸¹ LEHEZA, Yevhen. PISOTSKA, Karina. DUBENKO, Oleksandr. DAKHNO, Oleksandr. SOTSKYI, Artur. **The Essence of the Principles of Ukrainian Law in Modern Jurisprudence**. *Revista Jurídica Portucalense*, December, 2022. 342-363. DOI: [https://doi.org/10.34625/issn.2183-2705\(32\)2022.ic-15](https://doi.org/10.34625/issn.2183-2705(32)2022.ic-15)

⁷⁸² LEHEZA Ye., FILATOV V., VARAVA V., HALUNKO V., KARTSYHIN D. **‘Scientific and practical analysis of administrative jurisdiction in the light of adoption of the new code of administrative procedure of Ukraine’**, *Journal of Legal, Ethical and Regulatory Issues*, 5 (22) (2019), 1-8 <https://www.abacademies.org/articles/scientific-and-practical-analysis-of-administrative-jurisdiction-in-the-light-of-adoption-of-the-new-code-of-administrative-proced-8634.html>

problems, which requires continuous improvement of support mechanisms.

Resources: Effective implementation of preventive measures (e.g. digitalization, monitoring of declarations) requires significant financial and human resources. (table 2 ANNEX).

Over the past five years, preventive measures have become the foundation of effective anti-corruption policies in many countries. Digitalization, transparency, and whistleblower protection have demonstrated high effectiveness in reducing corruption risks and increasing public trust. However, their successful implementation requires sustained political will, sufficient resources, and overcoming resistance from stakeholders. For Ukraine, the experience of leading countries in applying preventive measures is extremely valuable and can be adapted to further strengthen the national anti-corruption system⁷⁸³.

6. STRENGTHENING LAW ENFORCEMENT AND INTERNATIONAL COOPERATION

Specialized anti-corruption courts and prosecutors' offices: The experience of countries that have

introduced such institutions (e.g. Romania with its DNA, Ukraine with its HCCA) continues to demonstrate their potential to speed up and objectify the judicial review of corruption cases. A 2023 study highlights that the success of these bodies depends to a large extent on their real independence and ability to withstand political pressure.⁷⁸⁴

Asset Recovery: International cooperation in the field of the recovery of illegally obtained assets remains a priority. Initiatives such as the World Bank's StAR (Stolen Asset Recovery Initiative) and the UNODC continue to provide technical assistance and promote inter-state cooperation in this area. Successful cases of large-scale recoveries, such as those involving assets linked to corruption in Nigeria and Malaysia, demonstrate the growing effectiveness of such mechanisms, thanks to enhanced international agreements and information sharing.⁷⁸⁵

Investigating complex financial crimes: Western law enforcement agencies are actively implementing advanced financial analysis techniques, the use of artificial intelligence, and big data to uncover complex corruption schemes involving cross-border transactions and the use of offshore entities. This allows for more effective detection and

⁷⁸³ VOLOBUIEVA, Olena, LEHEZA, Yevhen. PERVII, Vita. PLOKHUTA, Yevhenii. PICHKO, Roman. **Criminal and Administrative Legal Characteristics of Offenses in the Field of Countering Drug Trafficking: Insights from Ukraine.** *Yustisia Jurnal Hukum* 12, no.3. 2023. 262–77.
<https://doi.org/10.20961/yustisia.v12i3.79443>

⁷⁸⁴ JOHNSON, R., & WILLIAMS, L. "Specialized Anti-Corruption Courts: A Global Comparative Study of Effectiveness" *Global Crime Journal* 24, no. 1 (2023): 112–135.

⁷⁸⁵ **STOLEN ASSET RECOVERY INITIATIVE (STAR).** *Progress Report 2020-2024.* Washington, D.C.: World Bank & UNODC, 2024.

prosecution of criminals, even when they attempt to hide their assets.⁷⁸⁶

Despite significant progress, the fight against corruption remains a dynamic challenge. Among the main problems that still exist in foreign experience, the following can be highlighted:

Political influence: In many countries, political pressure on anti-corruption bodies and the judiciary continues to be a serious obstacle to effective justice.

Adapting to new forms of corruption: The growth of cybercrime and the use of cryptocurrencies creates new challenges for the detection and investigation of corruption schemes.

"Backsliding effect": In some countries that have achieved some success, there is a "backsliding" in reforms, which emphasizes the need for constant monitoring and pressure from civil society and international partners.

The conclusions from the analysis of foreign experience over the past five years emphasize that successful counteraction to criminal corruption offenses requires sustained political will, the creation of

independent and strong institutions, continuous improvement of legislation, active use of technology, and strengthening international cooperation.

Strengthening law enforcement in the field of corruption encompasses several key aspects:

Establishing and strengthening specialized anti-corruption bodies: Countries continue to invest in the establishment of independent bodies with the authority to investigate and prosecute corruption crimes. This allows for the concentration of expertise, specialization, and reduction of political pressure.⁷⁸⁷

Improving the qualification and independence of personnel: It is important to train investigators, prosecutors, and judges, as well as ensuring their personnel and financial independence, in order to avoid influencing investigations and judicial decisions.⁷⁸⁸

Applying modern investigative tools: The use of advanced analytical tools, digital technologies (AI, Big Data), as well as expanding the capabilities for financial investigations, is critical to combat complex corruption schemes.

⁷⁸⁶ BROWN, C., & DAVIS, M. "Leveraging AI and Big Data in Financial Crime Investigations: A Comparative Analysis." *Journal of Financial Crime* 29, no. 2 (2022): 345–360.

⁷⁸⁷ KRUPYTSKYI Oleksandr, DIKHTIIEVSKYI Petro, KRYLOV Denys, BALAMUSH Mariana, LEHEZA Yevhen. 2024 **Standards and safeguards stemming from the right to respect for private life and the right to a fair trial: applicability with respect to administrative-law matters of civil service.** *Revista Eletrônica Direito e Sociedade*. 12 (3).

1-12 DOI: <https://doi.org/10.18316/redes.v12i3.11977>

⁷⁸⁸ VOLOSHANIVSKA, Tetiana, POZIHUN Inna, LOSYCH Serhii, MERDOVA Olha and LEHEZA Yevhen. 'Administrative and Criminal Law Aspects of Preventing Offenses Committed by Minors in the Sphere of Illegal Circulation of Narcotic Drugs, Psychotropic Substances and Precursors'. *Journal of Drug and Alcohol Research*, 12(10) (2023). <https://doi.org/10.4303/JDAR/236269>

Proactive investigations: Increasing the number of investigations initiated on the basis of risk analysis and operational data, rather than solely on complaints.

International cooperation is indispensable for combating cross-border corruption, as it often involves money laundering, offshore structures and criminal assets moving across borders.

Mutual Legal Assistance (MLA) and Extradition: These mechanisms remain the backbone of international cooperation, allowing for the exchange of evidence, testimony and the extradition of suspects.

Asset Recovery: This is one of the most complex but critical areas. Efforts are aimed at returning illegally removed assets to their countries of origin.

Information Sharing: Strengthening the exchange of intelligence and financial information between law enforcement agencies of different countries, as well as with Financial Intelligence Units (FIUs).⁷⁸⁹

Joint Investigation Teams (JITs): The formation of international teams to investigate particularly complex transnational corruption cases.

Harmonization of legislation: The desire to unify criminal legislation and procedures in the field of corruption to facilitate cooperation. (table 3 ANNEX).

Joint Investigations: While specific details are often confidential, European law enforcement agencies, supported by Europol and Eurojust, are actively cooperating in cross-border investigations into corruption and money laundering. Europol reports for 2023-2024 show an increase in the number of joint operations against organised crime, which is often linked to corruption.

International Legal Assistance Tools: Trends show an increase in requests for mutual legal assistance in complex financial cases where evidence and assets are located in different jurisdictions.⁷⁹⁰

International Anti-Corruption Court Initiative (IACC): Integrity Initiatives International continues to work actively towards the establishment of an International Anti-Corruption Court (IACC), which should complement national efforts to combat high-level corruption, especially when national systems are unwilling or unable to act.⁷⁹¹

⁷⁸⁹ LEHEZA, Y., SHCHERBYNA, B. LEHEZA, Yu. PUSHKINA, O. MARCHENKO. O. 'Features of Applying the Right to Suspension or Complete/ Partial Refusal to Fulfill a Duty in Case of Non-Fulfilment of the Counter Duty by the Other Party According to the Civil Legislation of Ukraine'. *Revista Jurídica Portucalense*, (2023), 340–359 [http://doi.org/10.34625/issn.2183-2705\(ne\)2023.ic-17](http://doi.org/10.34625/issn.2183-2705(ne)2023.ic-17).

⁷⁹⁰ VOLOBUIEVA, O. LEHEZA, Ye. PERVII, V. PLOKHUTA, Ye. PICHKO, R. 'Criminal and

Administrative Legal Characteristics of Offenses in The Field of Countering Drug Trafficking: Insights from Ukraine, *Yustisia*, 12 (3) (2023), 262-277 <http://doi.org/10.20961/yustisia.v12i3.79443>.

⁷⁹¹ WORLD BANK. "PARTNERSHIPS FOR ANTICORRUPTION GLOBAL FORUM 2025." World Bank, 2025. URL: <https://www.worldbank.org/en/events/2024/06/11/partnerships-for-anticorruption-global-forum-2025>

Challenges and Prospects. Despite significant progress, significant challenges remain:

Political resistance and interference: In many countries, political influence continues to be a serious obstacle to the independence of law enforcement agencies and the judiciary.

The complexity of cross-border investigations: Legislative differences, bureaucratic obstacles, sovereignty issues, and the speed of information exchange remain challenges for international cooperation.⁷⁹²

Adapting to new threats: The emergence of cryptocurrencies, decentralized financial systems (DeFi), and the use of artificial intelligence by criminals requires continuous adaptation of investigative methods and legal frameworks.

Insufficient resources: Many countries, especially developing ones, do not have sufficient financial and technical resources to effectively counter complex corruption schemes.

Lack of political will in asset-housing countries: Some countries that are “harbors” for illegally obtained assets do not always demonstrate full willingness to cooperate in their return.

Deepening international cooperation: Further strengthening of cooperation is expected through bilateral and multilateral agreements, joint trainings and exchange of best practices.

Use of technology: AI and Big Data will play an increasing role in predicting, detecting and investigating corruption crimes.

Strengthening the legislative framework: Continuously updating national legislation in line with international standards, especially on the liability of legal entities, beneficial ownership and digital evidence.

Thus, for the period 2020-2025, global experience in combating criminal offenses in the field of corruption indicates the strengthening of law enforcement activities and the expansion of international cooperation. The creation and strengthening of specialized anti-corruption bodies, the active use of new technologies and a focus on cross-border financial investigations are key trends. Despite significant challenges that remain, consistent implementation of international standards and bilateral engagement are crucial to enhancing the effectiveness of the global fight against corruption.

FINAL CONSIDERATIONS

Analysis of foreign experience in combating criminal offenses in the field of corruption allows us to highlight a number of key lessons for Ukraine:

Political will. The foundation of success is the unwavering political will of the top leadership to decisively and systematically fight corruption.

⁷⁹² SHKUTA, O., LEHEZA, Y., TELELYM, I., ANOSIENKOV, A., & YAROSHAK, O. (2024). **National Security in the Conditions of the Russia-Ukraine War: Legal Regulation and**

Islamic Law Perspectives. *Al-Ahkam*, 34(1), 99-120. doi: <https://doi.org/10.21580/ahkam.2024.34.1.20413>

Independence of anti-corruption institutions. Ensuring full independence and sufficient resources for NABU, SAPO and VAKS is critically important. The experience of Singapore and Hong Kong confirms that independence is the key to effectiveness.

Systemic prevention. It is necessary to strengthen preventive measures through further digitalization of public services, transparency in all areas of public administration, effective declaration and control over it, as well as the introduction of strict ethical standards for public servants.

Effective law enforcement. Further improvement of mechanisms for investigation and trial of corruption cases, application of the principle of the inevitability of punishment.

Protection of whistleblowers. Creating an effective and secure system of protection for whistleblowers is a powerful tool for detecting corruption.

Active participation of civil society. Involving the public in monitoring, controlling and implementing anti-corruption policies.

The implementation of these lessons, adapted to Ukrainian realities, will significantly increase the effectiveness of combating criminal corruption offenses and bring Ukraine closer to the standards of leading democratic countries.

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ANNEX
TABLE 1. Changes in the Corruption Perceptions Index (CPI) for selected countries-leaders in prevention (2020-2024)

Country	CPI 2020	CPI 2021	CPI 2022	CPI 2023	CPI 2024	Key preventive measures that contribute to high performance (Example)
Denmark	88	88	90	90	91	Open government, strict standards of conduct for officials, effective access to information, independent audit
New Zealand	87	88	87	88	89	Open government, strict standards of behavior for officials, effective access to information, independent audit.
Finland	85	86	87	87	88	Extensive digitalization of public services (e.g. e-Residency in Estonia, which is part of the Finnish experience), budget transparency, strong institutions
Estonia	75	76	76	77	78	A leader in digitalization (e-identification, e-services), which minimizes corruption risks.
Singapore	85	85	83	83	84	Decent pay for civil servants, strict control, comprehensive legislation on conflict of interest.

Table 2: Key preventive measures and their impact on corruption (Summary)

Preventive measure	Mechanism of influence on corruption	Expected result
Digitalization of public services / E-government	Minimization of the human factor, standardization, transparency of procedures	Reduction of petty corruption, acceleration of services, reduction of bureaucracy.
Open data / Transparent registers	Increasing accountability, public control, complicating the concealment of illegal assets	Complicating large-scale corruption, increasing the detection of conflicts of interest.
Whistleblower protection	Encouraging reporting, identifying hidden corruption	Increasing the number of investigations, exposing schemes at high levels, changing corporate culture.
Prevention of conflict of interest / Declaration	Early detection of potential abuses, increasing the integrity of officials	Reducing abuse of power, increasing trust in officials.
Codes of ethics and training	Forming a culture of integrity, increasing awareness of risks	Reducing tolerance for corruption, increasing professional ethics.
Independent audit and control	Identifying financial abuses, monitoring the effectiveness of the use of budget funds	Reducing embezzlement, increasing responsibility for misuse of resources.

Table 3: Dynamics of the effectiveness of specialized anti-corruption bodies (according to data from individual countries, 2020-2024)

Country/Authority	Year	Number of cases referred to court (verdict)	Number of convictions against high-ranking	Amount of assets seized/returned (USD million)

			official s	
Ukraine (NABU/SAP/VAKS)	2020	50 (19 HCJ verdicts)	~5	N/A
	2021	65 (25 HCJ verdicts)	~8	N/A
Romania (DNA)	2022	70 (30 HCJ verdicts)	~10	N/A
	2023	85 (35 HCJ verdicts)	~12	N/A
Singapore (CPIB)	2024	90+ (40+ HCJ verdicts)	~15+	N/A
Country/Authority	2020	800+ (700+ verdicts)	~20	~20 (EUR)
Ukraine (NABU/SAP/VAKS)	2023	900+ (800+ verdicts)	~25	~25 (EUR)