

Overview of Data

Ukraine scores well below most of Europe and below global averages on all surveyed indicators for governance and transparency. More Ukrainians report the need to give gifts to secure a government contract than citizens of any other country. However, there appear to be positive recent trends in some indicators. Ukraine has been the location of only three FCPA enforcement matters.

Corruption and Governance Indicators	Ukraine	G7 Average
Transparency International Corruption Perceptions Index	32	73
World Bank Control of Corruption Score	18	88
World Justice Project Rule of Law Score	50	76
Major Correlates of Corruption		
Nominal GDP Per Capita Percentile Rank	30	89
World Bank Government Effectiveness Score	38	90
World Bank Enterprise Survey Responses (2013)	Ukraine	Top 10 Countries
Share of firms reporting at least one bribe request	50%	1.4%
Share of firms expected to give gifts to secure government contract	99%	1.9%
Share of firms expected to give gifts to officials to “get things done”	73%	1.5%
Share of businesses reporting corruption is a major constraint	38%	7.5%

**All indicators are scores/100 or are percentile ranks, 100=best. Some scores have been adjusted accordingly. 1-33 34-66 67-100.*

FCPA Cases (as reported)

Total FCPA Enforcement: 3 Cases

- **Analogic**—The medical technology company’s Danish subsidiary BK Medical allegedly made numerous suspicious payments in multiple countries, including Ukraine, between 2001 and 2011. This included overpayments from distributors to BK which were then used for undocumented purposes. In 2016 Analogic agreed to pay a disgorgement but the SEC acknowledged that Analogic had self-reported BK’s behavior and pursued no civil penalty. BK faced criminal charges and entered into a non-prosecution agreement.
- **Archer-Daniels-Midland**— An internal ADM review found that its subsidiaries in Germany and Ukraine had allegedly made more than USD 20 million in bribe payments between 2002 and 2008. These payments were made to secure tax refunds in both countries. After self-reporting this discovery to the SEC, ADM settled with the SEC and DOJ for more than USD 50 million in penalties, disgorgement, and other sanctions.
- **Teva Pharmaceuticals**— The Israeli drug company allegedly made improper payments of USD 200,000 between 2002 to 2011 to a Ukrainian official to facilitate the approval of some of its products for use in the country. The SEC and DOJ brought cases against Teva for this alleged activity in Ukraine as well as other alleged improper payments in Mexico and Russia which resulted in a final settlement of more than USD 500 million in 2016.

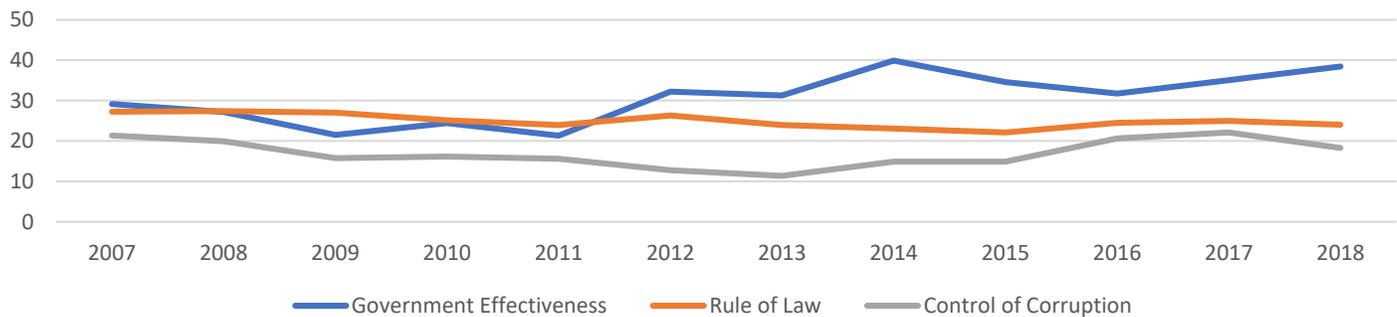
Information Accessibility and Transparency

Corporate Records	●	Records for public and private companies are available online for nominal fees. Shareholding information is not always available and technical problems may limit searches.
Freedom of Press	●	Reporters without Borders rank 101/180 (180=worst) Freedom House score 53/100, “partly free” (100=least free)
Language Accessibility	●	Transliteration to Cyrillic text may cause slight issues with machine translated research.
Financial Disclosure	●	Tax Justice Network Financial Secrecy Score—69 (100=most secretive)

● Poor ● Moderate ● Accessible

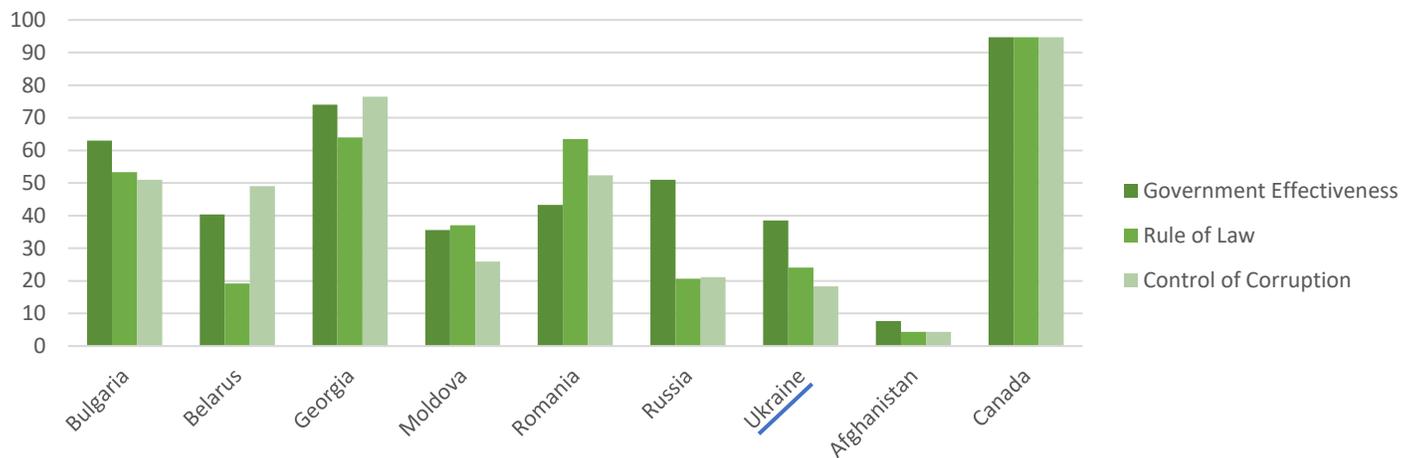
Trendlines—World Bank Worldwide Governance Indicators

100=best



Country Comparison—World Bank Worldwide Governance Indicators

100=best



Context: Corruption in Ukraine

Corruption is pervasive in Ukraine in all sectors and areas of government administration. Years of misappropriation of state funds by high-level officials has caused public outrage and placed corruption at the center of political debate in Ukraine. Market reforms and other indirect approaches to battling corruption promoted by current President Petro Poroshenko have done little to assuage discontent, particularly as the public believes that too little has been done to hold corrupt officials to account. Nonetheless, some analysts attribute recent improvements in some business environment indicators to these reforms.