Draft

STRATEGY
for the prevention of threats related to excessive influence of individuals who hold significant economic and political weight in public life (oligarchs)
(De-oligarchization strategy)

I. General provisions

The Strategy for the prevention of threats related to excessive influence of individuals who hold significant economic and political weight in public life (oligarchs), (hereinafter the Strategy) identifies potential and existing threats related to influence of these persons over public life in Ukraine, as well as directions and goals of the state policy aimed at reducing such threats.

The Strategy is aimed at implementation of a systemic approach to reduce the influence of oligarchs on the economic, political, and overall public areas.

The terms in the Strategy are used per the definitions specified in the Criminal Code of Ukraine as well as the Laws of Ukraine "On preventing threats to national security associated with excessive influence by persons who wield significant economic and political weight in public life (oligarchs)", "On corruption prevention", "On protection of economic competition", "On preventing and countering the legalization (laundering) of criminal proceeds, financing of terrorism, and financing the proliferation of weapons of mass destruction", and "On media".

The Strategy is based on the following principles:

–the rule of law;

–proportional and individual responsibility;

–transparency, accountability and democratic civilian oversight;

–compliance with Ukraine's international obligations;

–comprehensiveness.

The legal basis for the Strategy is the Constitution of Ukraine, international treaties ratified by the Verkhovna Rada of Ukraine, the Law of Ukraine "On preventing threats to national security associated with excessive influence by persons who wield significant economic and political weight in public life (oligarchs)", (hereinafter - the Law against oligarchs), other laws, as well as other legislative acts of Ukraine adopted for their implementation.

The Strategy's implementation is designed to be undertaken by 2032.

II. Analysis of the current state of affairs

1. Internal issues related to the oligarchs' influence

The significant influence of oligarchs over the economy and the politics is regarded as one of the major issues in Ukraine. Both national experts and Western partners emphasize that it is a real obstacle to European and Euro-Atlantic integration, which impedes free economic development and poses a threat to strengthening of democracy.

The Law against oligarchs adopted in 2021 remains unimplemented, and genuine measures aimed at reducing the influence of oligarchs are sporadic and spotty.

Under the martial law introduced on February 24, 2022, the Ukrainian economy suffered significant losses, political life was put on hold, and certain rights and freedoms of citizens were restricted for the purpose of ensuring the security and defense of the state in accordance with the Constitution of Ukraine. These factors together created a public perception of successful natural de-oligarchization of Ukraine, which was strengthened by media reports on individual oligarchs' fleeing the country or being detained.

However, a certain degree of closedness in the state and business activities created preconditions for the prospective shadow accumulation of economic and political resources by some individuals, which gives rise to a threat of restoration of oligarchy in Ukraine and strengthening the influence of oligarchs after the termination or abolition of martial law. Despite the ongoing aggression, some oligarchs continue to directly or indirectly maintain connections with Russian businesses, which poses a threat to both national security and Ukraine's European integration course.

The oligarchs' attempts to retain influence over state and local governments impedes or creates obstacles for anti-corruption and antimonopoly policies, which in turn slows the development of small and medium-sized businesses. The availability of economic and financial resources gives oligarchs the opportunity to increase their influence over public policy. For this purpose, they use various tools:

–forming controlled political parties or shadow financing of individual politicians at the national and local levels, which allows oligarchs to control legislative and regulatory processes;

–blocking market and democratic reforms that threaten the oligarchs' monopoly position and facilitate the dismantling of their corporations;

–creating and implementing corruption schemes in the area of public procurement (including energy resources), which leads to irrational use of budget funds, with their obtaining by oligarchs not contributing to the development and modernization of production;

–monopolization of strategically and socially important sectors of the economy, as well as control over the most profitable industries, including those related to the extraction, processing and distribution of energy, and mineral resources.

Adopted in 2021, the law “On preventing threats to national security associated with excessive influence by persons who wield significant economic and political weight in public life (oligarchs)” remains a declarative act without adequate implementation and contains a number of shortcomings. The European Commission for Democracy through Law (Venice Commission), in its opinion adopted at the 135th plenary session on June 9-10, 2023, stated that anti-oligarchic measures cannot and should not be limited to pro-forma procedures for recognizing a person as an oligarch, but should be comprehensive and systemic. The Law itself does not establish a comprehensive system for preventing influence of oligarchs on economic, political, and social life in Ukraine, and therefore cannot be used as an exclusive and sufficient tool for de-oligarchization. Therefore, it is necessary to develop and adopt comprehensive amendments to the laws (regarding the political, financial, economic, antimonopoly, anti-corruption, information, and judicial areas, as well as public administration, state property management, law enforcement, etc.) aimed at reducing the economic and political weight of oligarchs in public life. At the same time, it is necessary to provide for enhanced responsibility of oligarchs and persons acting in their interests for a number of crimes.

The action plan for preventing the abuse of excessive influence by persons who hold significant economic and political weight in public life (oligarchs), approved by the Order of the Cabinet of Ministers of Ukraine dated November 24, 2021 № 1582-р (hereinafter the Action Plan), contains 20 measures, a number of which refer to other program documents, making the state of their implementation quite difficult to monitor and assess. This document does not fully cover all areas and directions of state activity that require the introduction of safeguards against oligarchic influence.

2. Ukraine’s international commitments and European integration course

In 2022, the European Council confirmed Ukraine’s prospect of becoming a member of the European Union. However, to become a candidate, Ukraine had to implement seven recommendations, including the introduction of an anti-oligarchic law aimed at limiting the excessive influence of oligarchs on economic, political, and public life. This should be done in a legally justified manner, taking into account the opinion of the Venice Commission regarding the relevant legislation.

Such opinion was published by the Venice Commission on June 12, 2023. It states that the non-transparent influence of oligarchs on economic, political and social life is a threat to the democracy-building. It is also noted that illegal methods are used to merge political decision-making and business interests. Oligarchs tend to successfully avoid the jurisdiction and ambit of the criminal, anti-corruption and anti-monopoly legislation utilizing methods designed to undermine the protective mechanisms of separation of powers and by exerting undue influence on the judiciary to their benefit.

Analyzing the global context, the Venice Commission outlined two approaches in fighting oligarchization: systemic and personal.

The first approach, focused on reducing the negative influence of oligarchs: the adoption and improvement of anti-monopoly, anti-corruption, taxation, electoral legislation, the laws on political parties, lobbying, media anti-money laundering, etc. Based on the experience of other countries (Canada, Germany, South Korea, and the United States), this approach can be quite effective and sufficient in the context of sustainable democracy.

The second approach involves the procedure of officially recognizing a person who meets a combination of criteria defined by the law as an oligarch, as well as introducing restrictions for such person and for public officials in case of their interaction with such person. Such an approach has a restrictive and punitive personalized nature, which may result in insignificant and short-lived impact.

Therefore, to overcome the excessive influence of oligarchs on political, economic, and social life in Ukraine, comprehensive measures that do not violate constitutional provisions and are effective enough to turn oligarchs into big business owners must be introduced.

In November 2023, the European Commission noted the progress in implementing a number of anti-oligarchic measures. At the same time, the Commission recommended taking measures to address corruption and rule of law problems, strengthen antimonopoly legislation, and improve the management of state-owned enterprises in accordance with the recommendations of the Organization for Economic Cooperation and Development, while intensifying privatization processes. Ukraine should also continue to align public procurement legislation with EU legislation, including the procedure for establishing a public procurement complaints commission.

In the area of prevention of oligarchs’ influence on political life, Ukraine should continue to improve electoral legislation, taking into account the recommendations of the OSCE Office for Democratic Institutions and Human Rights.

In addition, the European Commission noted that Ukraine, as a candidate for membership in the European Union, should continue systemic and comprehensive measures to fight against corruption, organized crime, and money laundering.

Thus, a set of anti-oligarchic measures is not only a demand from the Ukrainian society, but also a necessary requirement for Ukraine’s further European integration.

III. Strategic goals and indicators of their achievement

1. Regulatory and legal area

Strategic goal 1. Improve the regulatory framework, in particular in the areas of economy, finance, taxation, corruption prevention, customs control, law enforcement, countering organized crime, and money laundering, to eliminate opportunities for oligarchs to establish and strengthen their influence on politics, economy, and society.

Indicators of success:

1. A revision of existing laws and other legal regulations is conducted. Those laws that favor oligarchic influence are repealed or amended.

2. Provisions of the Law of Ukraine "On preventing threats to national security associated with excessive influence by persons who wield significant economic and political weight in public life (oligarchs)" are aligned with the Constitution of Ukraine to the maximum extent possible, taking into account the principles of legal certainty and the rule of law.

Strategic goal 2. Clearly define the legal status and requirements for the formation of bodies and individuals that support the work of public authorities.

Indicators of success:

1. The formation of a permanent body, advisory, consultative and other subsidiary bodies that support the activities of the President of Ukraine, and the selection of officials and officers of these bodies are based on the requirements of national security, anti-corruption legislation, and are understandable to the public. The total number of members of such bodies is limited given the burden on the state budget. Out of respect to their high stature and to ensure their independence, the Chairman of the Verkhovna Rada of Ukraine and MPs, the Prime Minister of Ukraine and other members of the Government, judges of general courts and judges of the Constitutional Court of Ukraine may not be members of advisory, consultative, and other subsidiary bodies established by the President of Ukraine.

2. The Regulation on the Office of the President of Ukraine defines the positions of first assistant, advisor, and spokesperson of the President of Ukraine as positions of the patronage service of the President of Ukraine; other positions in the permanent subsidiary body are classified as civil service positions.

3. The peculiarities of conflict of interest regulation in the activities of employees of the Office of the President of Ukraine are defined, as well as procedure for bringing these employees to disciplinary responsibility, in particular for corruption and corruption-related offenses.

4. Decision-making in state authorities, local self-government bodies, and other state institutions is carried out in a transparent manner, and the grounds for their adoption are explained to the public. The procedure for decision-making in the Office of the President of Ukraine is defined by the Rules of Procedure of the Office of the President of Ukraine.

Strategic goal 3. Create a system for preventing "legislative spam" – registration of draft legal acts that are populist in nature, lack sufficient justification for their adoption, not aimed at addressing the real needs of society and the state, and lead to an excessive workload of the Verkhovna Rada of Ukraine and other state bodies.

Indicators of success:

1. The Laws of Ukraine “On the Rules of Procedure of the Verkhovna Rada of Ukraine” and “On Lawmaking” establish requirements for real and sufficient justification of the need to adopt draft laws.

2. Only draft laws that have sufficient and clear justification and are aimed at addressing the real needs of society and the state are considered in the Verkhovna Rada of Ukraine.

Strategic goal 4. Increase the transparency and efficiency of the policy-making process by public authorities and local self-government bodies, taking into account the strategic vision of the state’s development.

Indicators of success:

1. The Law of Ukraine “On lobbying” does not contain gaps or conflicts that impede the normal interaction of the public and lobbying entities with public authorities in the process of preparing and adopting regulatory and legal acts and allow business representatives to influence these processes outside the procedures established in this Law.

2. The scope of lobbying includes legal acts adopted, in particular, by the Verkhovna Rada of Ukraine, the President of Ukraine, and the Cabinet of Ministers of Ukraine.

3. The terms used in the Law of Ukraine “On lobbying” are defined in the manner that allows to clearly distinguish lobbying activities from other forms of interaction between citizens and their associations with state and local authorities.

4. Procedures for preparing, adopting, implementing, and assessing the implementation of public policy program documents are unified and streamlined,

2. Political area and elections

Strategic goal 5. Create a political system that functions in accordance with the Constitution and legislation of Ukraine.

Indicators of success:

1. A procedure for periodic audit of registered political parties is introduced to identify grounds for possible annulment of their registration.

2. Mechanisms for annulment of registration of political parties that do not meet criteria set forth in the legislation and do not participate in political life are improved.

3. Only those parties that contribute to the formation and expression of the political will of citizens and participate in elections function in the political system.

Strategic goal 6. Improve the system of political parties financing, election campaigns, and referendums.

Indicators of success:

1. The legislation does not contain any gaps or conflicts that carry a risk of political parties’ dependence on the funds from one individual or group of individuals.

2. Mechanisms of political parties financing and formation of election funds contribute to the development of Ukraine's political system based on the principles of freedom of choice and democracy. Legislation limits the maximum donations to support a political party or finance election or referendum campaigning from one individual (group of individuals) during the period specified by law.

Strategic goal 7. Ensure transparent and democratic electoral processes, in particular by reducing the risk of manipulation with electoral preferences.

Indicators of success:

1. The Central Election Commission is an independent collegial state body that exercises effective control over legal compliance by all participants of the election and referendum process.

2. There is an effective institution of legal responsibility for violations of legislation in the area of direct democracy processes.

3. After the termination or abolition of martial law, elections are held on the basis of democracy and free expression of the will.

Strategic goal 8. Introduce rules of ethical behavior for persons authorized to perform state or local government functions and a system of accountability for violations.

Indicators of success:

1. Persons authorized to perform state or local self-government functions, in particular MPs and local council members, strengthen and maintain public confidence in the authority through their conduct by demonstrating and promoting high standards of conduct in their professional and private activities.

2. Legal and political responsibility for violation of rules of ethical behavior is inevitable and effective; the institution of responsibility performs, among others, a preventive function for other persons authorized to perform the functions of state or local self-government.

3. Public administration and management area

Strategic goal 9. Ensure administrative procedures are based on the principles of accessibility, barrier-free, simplicity, transparency, and accountability.

Indicators of success:

1. All administrative procedures are unified and simplified. They are accessible to all

Centres for provision of administrative services (CPASs) operate on the one-stop-shop principle. Their activities are stable, and the procedure for obtaining administrative services is simple and clear to citizens without the need for additional consultations.

3. Administrative services are available throughout the territory Ukraine.

4. The level of corruption in CPASs is constantly decreasing compared to previous periods, as confirmed by the results of nationwide survey of citizens.

Strategic goal 10. Strengthen the political independence and accountability of heads of ministries and other central executive bodies.

Indicators of success:

1. There are clear criteria for independent and accountable activities of ministries and other central executive bodies provided in the legislation, primarily in terms of their regulatory and oversight functions.

2. There are transparent procedures for appointing heads of ministries and other central executive bodies in accordance with clear criteria and requirements for candidates, including anti-corruption criteria. All appointments, except for political ones, are made on a competitive basis.

3. The law sets forth an exhaustive list of grounds for dismissal of heads of ministries and other central executive bodies, as well as the limits of legal responsibility.

Strategic goal 11. Implement tax and customs reforms to develop an effective tax and customs policy based on the rule of law, equality before the law, transparency, and accountability.

Indicators of success:

1. Tax and customs policy is clear to all business entities and is implemented on the basis of the principle of equality before the law, effectively ensuring the fulfillment of fiscal, social, and regulatory functions.

2. The activities of the State Tax Service of Ukraine and the State Customs Service of Ukraine are transparent, accountable, and controllable. These bodies are formed on a competitive basis in accordance with the law.

3. The performance of functions by these bodies does not create unreasonable obstacles for doing legal business, and the legislation clearly defines the limits of discretion of these bodies and the procedure for appealing their decisions.

4. The level of corruption in the tax and customs services is steadily decreasing compared to previous periods, as confirmed by the results of national surveys of citizens and businesses.

4. Financial, economic, and antimonopoly area; state property management

Strategic goal 12. Ensure a transparent and efficient system of state property management.

Indicators of success:

1. The activities of the Accounting Chamber and the State Audit Service of Ukraine are independent, accountable, and effective, as confirmed by independent assessment.

2. Budget expenditures are efficient and aligned with society’s and state needs.

3. Facts of theft of state and municipal property, misuse of budget funds, other violations of budget discipline, and budgetary abuses are detected in a timely manner, and the guilty persons are held legally responsible.

4. Ongoing detailed analysis of the reasons and conditions of these violations is conducted, and effective preventive measures are implemented.

5. Public procurement is transparent and meets the needs of public authorities and local self-governments. Procurement is based on the principle of equal access to procedures for all participants on a competitive basis.

Strategic goal 13. Introduce an effective system for preventing and countering economic monopoly and abuse of monopoly position in the market.

Indicators of success:

1. Membership of the Antimonopoly Committee of Ukraine is formed through open competitive procedures, and its activities are transparent, independent, and accountable.

2. Prosecution for anti-competitive activities is based on the principles of fairness and efficiency, and the procedures are clear and understandable for all market participants.

3. Signs of market monopolization are detected in a timely manner and measures for their prevention are implemented.

4. Price making procedure for critical infrastructure products is economically justified and understandable for all participants in the consumption chain.

Strategic goal 14. Ensure effective procedures for privatization of state and municipal property.

Indicators of success:

1. Privatization of state or municipal property that was conducted in violation of the law or on a non-competitive basis is reversed.

2. Privatization is conducted transparently, based on free competition and equal access for all participants of the process.

3. Procedures for privatization of state and municipal property are simple and clear.

Strategic goal 15. Strengthen the efficiency of state-owned and municipal enterprises.

Indicators of success:

1. Clear criteria for classifying business entities as critical infrastructure facilities are formulated.

2. Unprofitable state-owned and municipal enterprises that are not classified as critical infrastructure facilities are liquidated or privatized.

3. The legal status of state-owned and municipal enterprises is defined at the legislative level, allowing for application of anti-corruption legislation to their management and supervisory bodies.

4. Activities of state-owned and municipal enterprises do not require additional funding from the state and local budgets.

5. Critical infrastructure facilities are recognized as state property.

Strategic goal 16. Create favorable conditions for the development of a competitive business environment that promotes the development of the state's economy.

Indicators of success:

1. Scheduled inspections of business entities by state authorities are conducted according to clear schedules, whose formation principles are clear to all participants of the process.

2. The legislation defines the grounds and procedure for conducting unscheduled inspections of business entities.

3. Conditions are established under which transparent reporting and tax payment are economically viable. There are no gaps in the legislation to facilitate tax evasion.

4. Small and medium-sized businesses are provided with loans on favorable terms and other reasonable governmental support.

5. All individuals evading taxes or legalizing property obtained by criminal means are held legally responsible.

6. The practice of seizure of business entities is absent.

Strategic goal 17. Ensure effective disposal and management of property derived from corruption and other crimes, as well as of assets of companies that contribute to the financing of terrorism and armed aggression against Ukraine.

Indicators of success:

1. Effective mechanisms of international cooperation are established to identify and seize in a timely manner any assets illegally transferred outside Ukraine by criminal means.

2. Effective and transparent management of seized assets is carried out.

3. The sanctions policy is effective and implemented in accordance with the Ukrainian legislation and international acts.

Strategic goal 18. Strengthen the sustainability and independence of Ukraine's banking system.

Indicators of success:

1. Reliable corporate control is introduced in the banking sector, which eliminates the possibility of abuse and illegal withdrawal of assets.

2. There are equal conditions and rules for servicing of business entities.

Strategic goal 19. Improve efficiency of financial monitoring.

Indicators of success:

1. Threshold financial transactions that are subject to financial monitoring are economically justified and objective.

2. Oligarchs are subject to primary financial monitoring.

3.Data on the structure and ultimate beneficial owners of business entities is transparent.

4. Individuals violating the legislation in the area of financial monitoring are held legally responsible.

5. The area of use of extractives and natural resources

Strategic goal 20. Ensure an effective policy on the use of extractives and natural resources based on the principles of do-no-harm to humans and nature, equal access to resources, and protection of human rights and freedoms.

Indicators of success:

1. The procedure for granting and revoking of permits for the use of extractives and natural resources is transparent and understandable for all business entities.

2. Permits for the use of extractives and natural resources are granted taking into account the state of the environment and are economically justified.

3. Procedure for the use of extractives and natural resources is consistent with the sanctions policy, and there are effective mechanisms for recovery of assets of dishonest extractives and natural resource users in favor of the state.

4. There is an effective system of legal responsibility of business entities that violate legislation in the area of extractives and natural resources use.

6. Area of preventing and countering corruption

Strategic goal 21. Ensure inevitability of responsibility for grand corruption involving persons holding a particularly responsible office and oligarchs.

Indicators of success:

1. The legislation does not contain gaps that help to avoid responsibility for corruption, particularly on the grounds related to lapse of procedural terms.

2. The most qualified independent professionals are engaged in all stages of criminal proceedings involving grand corruption by persons holding a particularly responsible office and oligarchs.

3. Provisions of criminal law are consistent with the EU legislation, exclude the possibility of inaccurate qualification of corruption-related criminal offenses, are clear, and facilitate a clear delineation of offenses.

4. Sanctions for corruption-related criminal offenses are effective and proportionate.

5. All individuals are held legally responsible for criminal corruption offenses they committed.

Strategic goal 22. Strengthen the effectiveness of countering corruption at the highest level.

Indicators of success:

1. The Criminal Code of Ukraine defines elements of intentional offenses, where the commission of an act (illegal interference in the activities of a public

official, judge, member of an election commission, etc., appropriation, embezzlement or seizure of another's of property through abuse of office, providing an illegal benefit to an official, smuggling, legalization of property obtained by criminal means, tax evasion, illegal privatization of state and municipal property, etc.) by an oligarch is a qualifying feature.

2. Anti-competitive coordinated actions by business entities prohibited by the legislation on protection of economic competition, misrepresentation concerning the ownership structure of an entity in the media sector, issuance of an unlawful and unjustified court decisions, as well as failure to comply with sanctions or impeding their implementation are criminalized.

3. Corruption criminal offenses include those committed through abuse of office, in particular, illegal mining and capital market and organized commodity market manipulation, while corruption-related criminal offenses include contributing to a political party or providing financial (material) support for election or referendum campaigning and receiving a contribution from an oligarch in favor of a political party or to support for election or referendum campaigning.

4. Corruption and corruption-related criminal offenses committed by an oligarch are assigned to the exclusive jurisdiction of the National Anti-Corruption Bureau of Ukraine under the procedural guidance of the Specialized Anti-Corruption Prosecutor's Office, and criminal proceedings in these cases are within the jurisdiction of the High Anti-Corruption Court.

5. Grounds for transferring the jurisdiction of such offenses are clearly defined in the criminal procedure legislation and are exhaustive.

7. Judiciary and law enforcement area

Strategic goal 23. Complete the formation of independent courts, prosecution, and law enforcement agencies.

Indicators of success:

1. The positions of judges, prosecutors, investigators, and detectives are held by motivated individuals who are able to carry out their professional activities on the basis of independence, integrity, and professional ethics.

2. Competitive procedures for filling vacant positions of judges, prosecutors, investigators, and detectives are open to the public and are transparent and clear to all participants.

3. The credibility of justice is a priority in the implementation of the functions of the High Council of Justice, the High Qualification Commission of Judges of Ukraine, and the Qualification and Disciplinary Commission of Prosecutors.

4. The integrity and incorruptibility of judges, prosecutors, investigators, and detectives is a norm, and the level of corruption in courts and prosecutors' offices is constantly decreasing compared to previous periods, as confirmed by results of national surveys of citizens and businesses.

Strategic goal 24. Ensure an effective system of countering offenses that undermine the functioning of the state's economy.

Indicators of success:

1. The procedures for selecting and appointing the management of the Bureau of Economic Security of Ukraine are transparent and open, and there is no possibility of influencing the competition commissions.

2. Activities of the Bureau of Economic Security of Ukraine are effective and based on the principles of legality, accountability, and independence.

3. Those guilty of encroaching on social relations in the economic sphere are held legally responsible based on the principles of justice and inevitability.

8. Informational area

Strategic goal 25. Ensure genuine independence of media sector actors

Indicators of success:

1. Editorial policy of media sector actors is protected from interference by any third parties, including media owners; it is carried out in compliance with journalistic standards.

2. Those guilty are held legally responsible for interference with and obstruction of journalistic activity.

3. Journalists, including investigative journalists, do not feel threats to their and their close relatives' lives, health, and property, and are free to perform their professional activities.

4. Media sector actors carry out their professional activities in a market environment based on the principles of free competition.

5. Activities of other forms of mass communication are controlled and balanced, with citizens accessing objective data.

Strategic goal 26. Create a high level of media literacy among the population as a safeguard against negative impact of fraudulent schemes, propaganda, mind manipulation, and the formation of biased public opinion.

Indicators of success:

1. Political campaigning material is legally limited in time and space. The rules for its distribution are clear and understandable, and the requirements for its design allow for its clear identification.

2. The legislation does not contain gaps that allow evading responsibility for violation of the rules of political campaigning.

3. The number of citizens capable of critically assessing information and avoiding negative impact of fakes, manipulations, propaganda, etc. is increasing, as confirmed by results of sociological surveys.

9. International relations area

Strategic goal 26. Ensure effective cooperation between Ukraine and the European Union on prevention of cross-border crime, corruption, and negative influence of oligarchs.

Indicators of success:

1. A system of cooperation to identify elements of cross-border crime, corruption, and prevention of money laundering is established at the international level and is effective.

2. Ukrainian legislation on preventing and countering cross-border crime, corruption, and money laundering is unified with that of the European Union.

3. The practice of conducting criminal proceedings in other countries against Ukrainian oligarchs is established.

4. Ukraine, G7 countries, and the European Union have a consolidated position concerning the imposition of sanctions on individuals involved in terrorist financing and money laundering, as well as on prosecution of individuals for failure to comply with sanctions, impeding their implementation, and bypassing of sanctions.

IV. Mechanisms for achieving strategic goals

The Strategy is implemented by public authorities in cooperation with civil society institutions, international organizations, local self-government bodies, and other stakeholders.

The Cabinet of Ministers of Ukraine approves four-year plans for achieving strategic goals, which are developed by the Office of the Cabinet of Ministers of Ukraine with participation of stakeholders. If necessary, representatives of the European Union and international organizations may be involved in the process of developing these plans.

Plans for achieving all of the defined strategic goals should include indicators and stages of task implementation, responsible implementers, involvement of civil society institutions, international organizations, and other stakeholders. To ensure the continuity of the Strategy implementation, the next four-year plan is approved before the end of the current plan.

Achievement of the strategic goals at regional level is ensured by approving regional programs on reducing the excessive influence of individuals who have significant economic and political weight (oligarchs) on the activities of local self-government bodies and local authorities. Such programs should be consistent with plans for achieving strategic goals. Programs are developed and implemented with the involvement of civil society representatives.

The Cabinet of Ministers of Ukraine ensures overall coordination of the Strategy implementation at all levels.

V. Monitoring and assessment of the Strategy implementation

To ensure the monitoring and assessment of the Strategy implementation, the Monitoring Commission is established under the Cabinet of Ministers of Ukraine, which includes representatives of the government, civil society, international organizations, and other stakeholders.

The Commission develops and approves a methodology for monitoring and assessing the Strategy implementation, as well as hears and receives reports on the implementation of plans and programs.

Semi-annual and annual reports on the implementation of plans and programs for achieving strategic goals are published on the website of the Cabinet of Ministers of Ukraine. Based on the annual report, the Monitoring Commission may provide recommendations for adjusting these plans and programs.

To ensure effective monitoring and assessment of the Strategy implementation, regional monitoring councils may be established to hear and receive reports on the implementation of regional programs. Relevant reports of the monitoring councils are published on the website of the Cabinet of Ministers of Ukraine. Monitoring councils may provide recommendations for adjusting the regional programs.

The implementation level of indicators for achieving strategic goals, plans, and programs for the Strategy implementation, as well as indicators from reports on the assessment of Ukraine's fulfillment of international obligations and standards are considered in the course of monitoring and assessing the Strategy implementation. Indicators of relevant international ratings and indices are also taken into account.