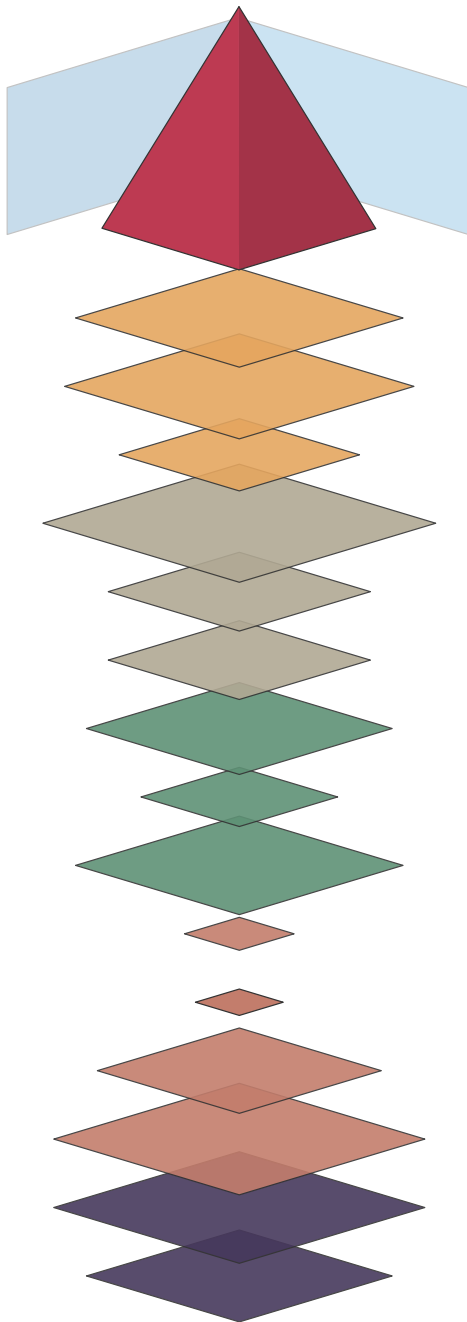


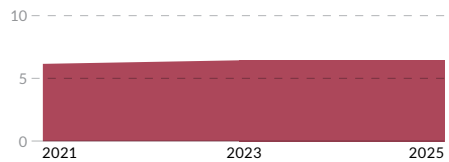
 **UKRAINE**



6.45 ↘0.03

CRIMINALITY SCORE

37th of 193 countries ↘6
2nd of 44 European countries -
2nd of 17 Central and Eastern European countries -



CRIMINAL MARKETS **6.40** ↗0.13

HUMAN TRAFFICKING	7.50	0.00
HUMAN SMUGGLING	8.00	0.00
EXTORTION & PROTECTION RACKETEERING	5.50	↗0.50
ARMS TRAFFICKING	9.00	0.00
TRADE IN COUNTERFEIT GOODS	6.00	↗0.50
ILLCIT TRADE IN EXCISABLE GOODS	6.00	↗1.00
FLORA CRIMES	7.00	0.00
FAUNA CRIMES	4.50	0.00
NON-RENEWABLE RESOURCE CRIMES	7.50	0.00
HEROIN TRADE	2.50	↘1.50
COCAINE TRADE	2.00	↗0.50
CANNABIS TRADE	6.50	0.00
SYNTHETIC DRUG TRADE	8.50	↗0.50
CYBER-DEPENDENT CRIMES	8.50	0.00
FINANCIAL CRIMES	7.00	↗0.50



CRIMINAL ACTORS **6.50** ↘0.20

MAFIA-STYLE GROUPS	5.00	↘0.50
CRIMINAL NETWORKS	7.50	0.00
STATE-EMBEDDED ACTORS	8.00	0.00
FOREIGN ACTORS	7.00	0.00
PRIVATE SECTOR ACTORS	5.00	↘0.50



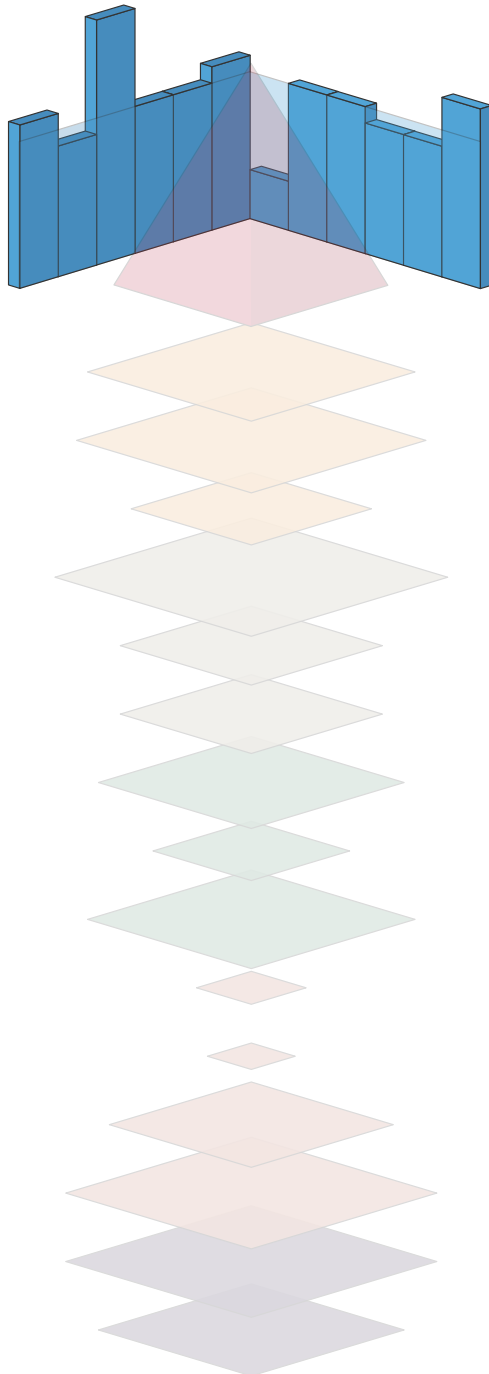
This project was funded in part by a grant from the United States Department of State.



Funded by the European Union

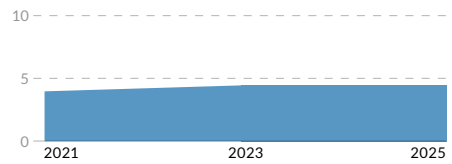
ENACT is funded by the European Union and implemented by the Institute for Security Studies and INTERPOL, in affiliation with the Global Initiative Against Transnational Organized Crime.

 **UKRAINE**



 **4.54** ↘0.00
RESILIENCE SCORE

110th of 193 countries -
39th of 44 European countries -
13th of 17 Central and Eastern European countries -



POLITICAL LEADERSHIP AND GOVERNANCE	5.00	0.00
GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY	4.00	↗0.50
INTERNATIONAL COOPERATION	7.50	0.00
NATIONAL POLICIES AND LAWS	4.50	0.00
JUDICIAL SYSTEM AND DETENTION	4.50	0.00
LAW ENFORCEMENT	5.00	0.00
TERRITORIAL INTEGRITY	1.50	0.00
ANTI-MONEY LAUNDERING	4.50	0.00
ECONOMIC REGULATORY CAPACITY	4.50	↘0.50
VICTIM AND WITNESS SUPPORT	4.00	0.00
PREVENTION	4.00	0.00
NON-STATE ACTORS	5.50	0.00



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CRIMINALITY

CRIMINAL MARKETS

PEOPLE

Ukraine continues to be both a source and transit country for human trafficking, with the ongoing war exacerbating existing vulnerabilities. Ukrainian victims, particularly women and children, are exploited both domestically and abroad. Citizens are trafficked primarily to Russia, Poland, Germany, China, Kazakhstan and Western Asian countries, with a rising number of cases reported in several EU states. The displacement crisis caused by the war has intensified these risks, as traffickers specifically target refugees at border crossings, offering fraudulent assistance in exchange for forced labour or sexual exploitation. Reports indicate a significant increase in online searches for Ukrainian women involved in sex work, suggesting a surge in demand for trafficked victims. In Russian-occupied territories, women and girls have been abducted and forced into prostitution. Ukrainian children, especially unaccompanied minors and those evacuated from care facilities, are at a heightened risk of trafficking. They have fallen victim to forced labour and sexual exploitation, with authorities identifying multiple cases linked to child pornography. Local criminal networks, along with Russian criminal groups and military personnel, are involved in these trafficking operations. The economic downturn and the ongoing war have further heightened vulnerabilities, pushing more individuals into exploitative labour situations.

Ukraine's human smuggling market has grown substantially since the onset of the war. While Ukrainian citizens can legally enter the EU under temporary protection measures, men aged 18–60 are prohibited from leaving the country due to martial law. This restriction has given rise to a large-scale smuggling industry that caters to those seeking to evade military service. Smugglers employ falsified medical documents and facilitate illegal border crossings. Many smuggling networks operate through encrypted messaging platforms, boasting thousands of members. Over 21 000 men have been apprehended while attempting to cross borders illegally, and dozens have lost their lives in the process of trying to escape conscription, drowning, for example, in the Tisa River along the Romanian border. The removal of the 'residence abroad' exception in June 2024 has further compelled individuals to pursue illegal migration routes.

Extortion is a well-established crime in Ukraine, affecting various sectors, including mining and energy. The ongoing war has worsened the situation, with reports indicating that Russian forces are extorting the families of Ukrainian soldiers through threats, kidnapping and torture. Additionally, criminal organizations have targeted the families of fallen

soldiers, demanding money under false pretences. Organized crime groups, such as the Korostyshiv gang, which has been active since 2014, have been implicated in severe forms of extortion, including blackmail and kidnapping. The economic hardship resulting from the war has rendered both individuals and businesses increasingly vulnerable to extortion schemes perpetrated by organized crime groups that exploit financial distress.

TRADE

The war has resulted in a surge of illegal weapons, although large-scale smuggling operations out of Ukraine have not been extensively documented. Recently, organized smuggling networks have begun to emerge, raising concerns about military personnel selling high-grade arms, including anti-aircraft weapons. Seizures near EU borders indicate a shift toward more structured trafficking operations. Reports suggest that hundreds of thousands of weapons have been lost or stolen, mostly in the eastern regions. A key concern is the potential for long-term diffusion of weapons into civilian society. Sales conducted through encrypted messaging platforms have increased, and some criminal actors disguise themselves as volunteers in order to acquire weapons. While isolated seizures of high-grade weaponry have occurred, there is currently no systemic trafficking network exporting arms from Ukraine.

Ukraine has a well-established market for counterfeit goods, driven by economic hardship and high consumer demand for cheap alternatives. Counterfeit tobacco, luxury items and pharmaceuticals remain prevalent. Criminal groups operate production hubs within the country, and large-scale raids have revealed significant quantities of counterfeit food, cigarettes and alcohol. These counterfeit products are smuggled into Ukraine through its ports and subsequently redistributed throughout Europe.

Illicit trade in excisable goods, particularly tobacco and alcohol smuggling, remains highly prevalent. The war has disrupted supply chains, leading to an increased demand for illegal excise goods. Smuggled tobacco and alcohol enter Ukraine and are then moved into Romania, Poland and Moldova. The illicit tobacco trade, in particular, has expanded, with Ukraine emerging as one of Europe's largest sources of contraband cigarettes. Smuggling operations are sometimes concealed within military shipments. Authorities have seized vast quantities of contraband, including tons of alcohol and millions of packs of cigarettes. Additionally, increased taxation has further incentivized contraband markets, establishing Ukraine as a key regional hub for illicit excise goods.

ENVIRONMENT

Flora crimes in Ukraine involve illegal logging, which has surged due to weakened oversight in conflict-affected regions. Russian forces have also engaged in illegal logging and the smuggling of Ukrainian timber. Corruption remains rampant in the forestry sector, with officials facilitating the illicit export of timber. Recent reports have highlighted the involvement of state-owned enterprises in unauthorized deforestation activities. The absence of digital tracking systems allows for document falsification, further exacerbating the problem. The EU is contemplating designating Ukraine as a high-risk jurisdiction for timber trade violations.

Concerning fauna crimes, Ukraine functions as both a transit and source country for wildlife trafficking. Species such as bears, parrots, snakes and cheetahs are smuggled through Ukraine en route to the EU, Asia. Additionally, the country faces challenges with sturgeon poaching along the Danube River, despite ongoing enforcement efforts.

Non-renewable resource crimes in Ukraine encompass illicit amber mining, primarily concentrated in the north-western regions. Smuggled amber is typically laundered through Poland and sold mainly to China. Reports indicate that the war has significantly disrupted the illicit amber market due to stricter border controls and increased military oversight. However, coal and oil smuggling continue to be substantial issues, particularly in Russian-occupied territories where unauthorized extraction is rampant. Oil smuggling, in particular, has intensified, with Ukrainian networks collaborating with Balkan groups to distribute illicit fuel. Although gold smuggling is not as prominent, it persists at lower levels.

DRUGS

Heroin trafficking in Ukraine has decreased due to the ongoing war. Supply shortages have driven up prices, prompting many users to turn to methadone and synthetic opioids. Consequently, heroin is now sold in minimal quantities, leading to a significant decline of the domestic criminal market.

Ukraine was a transit hub for cocaine before the war, but disruptions in Black Sea port operations have reduced trafficking and led to a decrease in availability. Initially, cocaine prices surged but later stabilized as new routes emerged. Recent police operations suggest a resurgence in trafficking, with seizures increasing in the western border regions. Prices remain higher than those in Western Europe, reflecting ongoing supply constraints.

Despite disruptions caused by war, cannabis production and consumption have remained stable. Domestic cultivation has encountered challenges, but demand persists. Prices have risen sharply, reflecting a growing social acceptance of cannabis. Recently, parliament approved legislation for medical cannabis, signalling potential regulatory changes.

Reports suggest that soldiers on the frontlines are using cannabis, occasionally mixed with stimulants.

The war has intensified the production and consumption of synthetic drugs, as amphetamine-type stimulants and synthetic opioids increasingly replace heroin. The prevalence of synthetic drugs has surged, accompanied by a rise in the seizure of precursor chemicals. Ukraine has emerged as a key regional producer, with clandestine laboratories expanding and online drug sales proliferating through encrypted messaging platforms and the darknet. Authorities have dismantled major synthetic drug networks, highlighting the growing domestic production and distribution of these substances.

CYBER-DEPENDENT CRIMES

Ukraine is a significant global hub for cybercrime, ranking among the top nations in terms of cyber threats. State-sponsored hacking campaigns target government institutions, infrastructure and financial entities. Pro-Russian cyber groups frequently launch attacks that disrupt digital systems. Additionally, Ukraine has seen an increase in ransomware groups targeting foreign victims. Despite ongoing efforts to combat cybercrime, the industry remains highly lucrative.

FINANCIAL CRIMES

Financial crimes, including corruption, embezzlement, tax evasion and fraud, are systemic in Ukraine. The war has exacerbated these issues, creating an environment where illicit financial activities thrive. Corruption scandals involving high-ranking officials continue to emerge. Fraudulent procurement schemes have exploited military funds, with investigations revealing extensive misuse of defence budgets. Tax evasion costs Ukraine billions annually, with schemes involving VAT fraud and offshore tax havens contributing to systemic financial losses. Additionally, Ukraine is reportedly home to thousands of call centres engaged in fraudulent schemes, each employing between 15 and 200 staff members, with larger operations generating up to one million euros per week. While these scams initially targeted Russian citizens, they have increasingly expanded their focus to include EU and British nationals. As Ukraine navigates the challenges of war and economic recovery, authorities have increased enforcement efforts, but financial crimes continue to pose a pressing challenge.

CRIMINAL ACTORS

Before the war, Ukraine had a strong but fragmented landscape of mafia-style groups, with varying degrees of influence across different cities. These organizations included traditional criminal hierarchies such as the vory v zakone (thieves-in-law) and avtoritety (criminal authorities who blend business with illicit activities). While some of these groups have suffered disruptions due to the war,

such as losing key territories and members, others have adapted by shifting to new illicit activities or relocating their operations to safer regions. They maintain a deep connection to the criminal subculture, strictly adhering to a code of conduct, while the authorities leverage their influence through economic and political connections. Historically, these groups controlled various sectors of organized crime, including extortion, drug trafficking and illegal resource extraction. However, the war has forced many to restructure, resulting in a reduction of their overall dominance compared to pre-war levels.

Ukraine has long been home to more loosely structured and adaptable criminal networks, many of which lack strict hierarchical leadership. These networks typically operate through personal, familial or opportunistic connections, facilitating a broad range of illicit activities. Unlike traditional mafia-style groups, they are highly flexible, making them resilient to law enforcement pressure and the upheaval caused by war. Rather than halting criminal operations, the war has reshaped them. Some networks have capitalized on war-related opportunities, such as smuggling essential goods and exploiting supply chain disruptions.

State-embedded actors continue to be one of the most significant enablers of organized crime in Ukraine, characterized by a high prevalence of corruption among state officials, law enforcement and political figures. The country's public institutions have long been plagued by bribery, nepotism and financial crimes, which undermine anti-crime initiatives and regulatory oversight. Before the war, law enforcement officials were frequently implicated in drug trafficking, prostitution and resource exploitation, often monopolizing illicit markets instead of dismantling them. More recently, major corruption scandals have continued to surface. Notably, in January 2024, Ukraine's Security Service uncovered that defence ministry officials and weapons suppliers embezzled millions of US dollars intended for military procurement. Similarly, high-ranking politicians have faced allegations of diverting funds from humanitarian aid and military spending. Despite wartime crackdowns on corruption, Ukraine remains vulnerable to state-embedded actors who manipulate legal and financial systems to facilitate organized crime. The Zelenskyy administration has taken steps to remove key officials linked to corruption. Still, systemic challenges persist, making it difficult to sustain reform efforts in the face of deeply entrenched criminal interests.

Foreign criminal organizations have long been involved in Ukraine's illicit markets, particularly those from Russia, Georgia, Azerbaijan and Türkiye. The war has further expanded opportunities for transnational crime, with foreign actors exploiting Ukraine's instability to smuggle drugs, weapons and other contraband. One of the most influential transnational groups is Khimprom, a Russian-Ukrainian network specializing in synthetic drugs and chemical precursors. Operating across Russia, Belarus, Ukraine and Kazakhstan, Khimprom has established itself as a dominant

player in Ukraine's drug trade. The group utilizes online platforms, particularly encrypted messaging platforms and dark web marketplaces, to distribute narcotics. Despite increased scrutiny from law enforcement, Khimprom's leadership has successfully relocated abroad while maintaining control over its operations. Between January and June 2024, Ukrainian authorities dismantled approximately 10 transnational criminal groups; despite this, foreign actors remain deeply entrenched. Their adaptability and cross-border networks render them formidable players in Ukraine's criminal ecosystem, often outmanoeuvring local law enforcement efforts.

Ukraine's private sector actors, particularly oligarchs, have historically played a significant role in organized crime. Before the war, oligarchs maintained near-total control over key industries, including gas, oil and banking, using their wealth to influence the political and judicial systems. The war has altered power dynamics, diminishing the direct political influence of oligarchs. With martial law in place, the government has consolidated power, reducing the ability of business elites to manipulate state institutions. However, this has not completely eradicated oligarchic influence. Many oligarchs have repositioned themselves as war financiers, donating resources to military efforts, whether out of patriotism, strategic reputation management or attempts to maintain influence in the post-war landscape. Since 2014, Ukraine has sought to curtail oligarchic power, and the ongoing conflict has accelerated these efforts. Key figures have faced unprecedented legal actions. Despite these crackdowns, private-sector actors continue to exert influence, particularly in finance, defence procurement and smuggling networks. While some have fled to Russia or been arrested, others remain embedded in Ukraine's wartime economy, strategically positioning themselves for future political and economic leverage.

RESILIENCE

LEADERSHIP AND GOVERNANCE

Ukraine's political leadership has undergone significant transformations due to the ongoing war, which has impacted its resilience against organized crime. Despite the challenges posed by the conflict, the government has continued to implement measures aimed at countering criminal networks and corruption. However, longstanding issues such as patronage, clientelism and corruption persist, limiting the effectiveness of governance reforms. The country has a history of organized crime infiltrating politics, with some criminal figures gaining political influence over the years. While the war has diminished the hold of some oligarchs on politics, corruption remains deeply embedded in the political system. President Volodymyr Zelenskyy's administration has taken steps to address these issues, particularly in the fight against smuggling and economic crimes. Public trust in the government has fluctuated significantly during the war, peaking at 90% in mid-2022 before stabilizing at around 59% in May 2024. While the government maintains democratic structures, concerns persist regarding political transparency and accountability, particularly in the context of wartime governance.

Ukraine has made notable progress in enhancing transparency, particularly through anti-corruption initiatives and the implementation of digital governance tools. The National Anti-Corruption Bureau of Ukraine and the National Agency on Corruption Prevention have played crucial roles in pursuing high-profile corruption cases. However, these agencies have encountered internal leaks, political interference and credibility issues, which have undermined their ability to operate independently. Legislative measures have been implemented to strengthen accountability, including laws that expand the powers of anti-corruption agencies and reinstate public asset declarations. Despite these efforts, public officials in both the executive and legislative branches continue to misuse their positions for personal gain, as demonstrated by recent scandals. In August 2024, a Deputy Minister was arrested in connection with a corruption case in the coal industry, highlighting ongoing vulnerabilities. Public perception reflects a mix of progress and scepticism, with many Ukrainians viewing corruption as a significant obstacle to EU integration and post-war recovery.

Ukraine continues to prioritize international cooperation in combating organized crime and enhancing governance. The country is a signatory to major international treaties, including the UN Convention Against Corruption and the UN Convention Against Transnational Organized Crime. Since 2022, Ukraine has received extensive financial, military and humanitarian aid from the EU, NATO and allied states to sustain its war effort and governance reforms. In 2024, Ukraine signed bilateral security agreements with multiple

nations, including the US, Japan and several European countries. Additionally, international law enforcement cooperation has been strengthened through partnerships with Europol and neighbouring EU states, particularly in efforts to combat arms and human trafficking. However, discussions on NATO membership remain stalled.

Ukraine's national legal framework criminalizes organized crime, including human trafficking, smuggling, arms and drug trafficking, illegal logging, cybercrime and financial offences. However, enforcement is undermined by corruption, political interference, limited resources and the ongoing conflict. Although recent amendments have strengthened some policies, laws against child exploitation and abuse remain under-enforced due to gaps in detection, support and prevention. Martial law, imposed in 2022, introduced further restrictions on movement, assembly and media, constraining fundamental freedoms.

CRIMINAL JUSTICE AND SECURITY

Ukraine's judicial system remains weak and vulnerable to corruption, with judges and prosecutors frequently implicated in bribery and political favouritism. Despite constitutional amendments aimed at strengthening judicial independence, political influence over judicial appointments persists in undermining fairness. Public trust in the judiciary remains low, with 73% of Ukrainians expressing distrust in 2024. The country's penitentiary system faces severe resource shortages, which the ongoing conflict has exacerbated. Several prisons suffer from poor living conditions, inadequate medical care and delays in judicial proceedings, resulting in 36% of detainees being held in pretrial detention. In Russian-occupied areas, reports of torture and inhumane treatment within detention facilities further complicate the situation.

Despite the war, Ukraine's law enforcement agencies continue to operate, maintaining a high level of public trust in the Armed Forces and National Guard. However, confidence in the National Police remains comparatively low, reflecting widespread concerns about corruption and abuse of power within civilian law enforcement structures. The war has stretched law enforcement resources, shifting focus from organized crime prevention to military defence. Specialised units responsible for tackling financial crimes and human trafficking are underfunded, which negatively impacts their effectiveness. OSCE

Ukraine's territorial integrity remains significantly compromised due to the Russian occupation and ongoing military battles in several key regions. These areas have become hotspots for transnational organized crime, including money laundering, illegal gambling and arms smuggling.

Corruption at border checkpoints further weakens territorial security, facilitating illicit trade. The war has also weakened state capacity, adversely affecting the monitoring of smuggling routes and border security operations.

ECONOMIC AND FINANCIAL ENVIRONMENT

Ukraine has strengthened its anti-money laundering (AML) framework to align with international standards. The country has implemented customer due diligence measures and transaction monitoring systems. However, corruption within financial institutions and law enforcement agencies continues to pose a challenge. Although the Financial Action Task Force evaluation found Ukraine to be largely compliant with international AML regulations, concerns remain regarding the enforcement of financial crime laws and the effectiveness of asset recovery efforts.

The war has severely undermined Ukraine's economic stability and regulatory capacity. In response, the government has implemented tax reforms and increased reliance on foreign aid; however, fiscal imbalances continue to pose challenges. Despite these disruptions, Ukraine's economy demonstrates some degree of resilience. Nevertheless, inflation, infrastructure damage from missile attacks and declining purchasing power remain significant economic risks.

CIVIL SOCIETY AND SOCIAL PROTECTION

Ukraine has maintained victim protection services despite budgetary constraints. The government has allocated funds for trafficking victims; however, most support is provided by NGOs and international organizations. Efforts to assist victims appear to have improved, but the lack of government-run trafficking shelters remains a challenge. Furthermore, Ukraine has increased anti-trafficking awareness campaigns with assistance from the OSCE and international donors, while also enhancing prosecutions against traffickers. Nevertheless, gaps in law enforcement training and victim identification remain.

Ukraine relies heavily on international organizations and NGOs for crime prevention and awareness campaigns, with these efforts strained by the ongoing war. While Ukraine does not fully meet minimum standards for eliminating trafficking, it continues to make significant efforts, including a new national action plan, resumed labour inspections, strengthened prosecutions and extensive awareness campaigns with international partners like the OSCE. However, challenges remain, such as lenient sentences. Additionally, the large veteran population poses risks of organized crime involvement, including drug use, arms trafficking and joining criminal groups, exacerbated by limited support and unclear policies. A comprehensive veterans' strategy focusing on demobilization, disarmament and reintegration is needed to reduce these risks and support their return to civilian life.

Civil society plays a crucial role in Ukraine's resilience, with NGOs supporting defence efforts and providing humanitarian aid. However, government regulations, including AML disclosure requirements for NGOs, have raised concerns about potential interference. Press freedom remains constrained, with journalists facing targeted discrediting campaigns and legal intimidation. Despite some progress, wartime censorship, media monopolization and legal restrictions continue to pose risks to independent reporting.

This summary was funded in part by a grant from the United States Department of State. The opinions, findings and conclusions stated herein are those of the authors and do not necessarily reflect those of the United States Department of State.