



**Business  
Ombudsman  
Council**

# Quarterly report

# 2

quarter

April 1 – June 30,  
2025

[www.boi.org.ua](http://www.boi.org.ua)



# Contents

1	Q2 2025 in review	05
2	BOC 10 years: mission possible	14
3	On the way to URC: the Business Ombudsman Council's contribution to Ukraine's recovery and investment environment improvement	18
4	Problems in the VAT system: monitoring implementation of recommendations by state bodies based on our own-initiative investigation results	23
5	Administrative procedure: implementation of Law on Administrative Procedure (LAP)	25
6	Case-based systemic business issues	26
7	Examples of successfully closed investigations	31
8	Cooperation with stakeholders	37

The abbreviations “BOC” and the “Council” are used interchangeably throughout the text of the report to refer to the Business Ombudsman Council.

In cases and feedbacks, published in the report, companies gave permission to disclose their names.



**European Bank**  
for Reconstruction and Development

The Business Ombudsman Council is financed by the EU and from the Ukraine Stabilization and Sustainable Growth Multi-Donor Account (MDA) managed by the EBRD.



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## Foreword

This spring, we marked the Business Ombudsman Council's first 10 years in action, joined by our stakeholders and friends from the EBRD and OECD, the Ministry of Economy, business associations, as well as our ultimate beneficiaries – companies whose problems we've solved. Video greetings from our first two Business Ombudsmen – Algirdas Semeta and Marcin Swiecicki – helped us assess challenges and successes along the way. We were able to show big numbers (over UAH 28 billion returned to Ukrainian business over the past decade), but also individual cases where our investigators made a difference, and helped small, medium and large enterprises survive and thrive. We also highlighted the initial successes of our Policy and Recovery team in identifying impediments to reconstruction and proposing solutions. I encourage you to flip to pages 14-17 of this report to get a sense of the positive mood of that event.

Can a complaints mechanism be a victim of its own success? In strictly statistical terms, as this quarterly report shows – yes. Overall complaints are down, particularly when it comes to our long-time number 1 source – the State Tax Service (STS). For the first time in my tenure, the proportion of tax cases has fallen from a steady two-thirds to just over half (52%). This is a noteworthy shift, especially if sustained.

What has happened in the world of Ukrainian taxation? There has been continuing improvement in the administration of the SMKOR VAT management system, much along the lines of the recommendations in our 2023 own-initiative investigation report. The proportion of VAT invoices blocked, as well as the sums involved, are down nearly by half.

It's a similar story – negative for our complaint statistics, but positive for taxpayers – when it comes to implementation of court rulings. The STS seems to have summoned the political and administrative will to do the constitutional thing – act quickly on court decisions – more early and more often: complaints about refusals and delays are down by three-quarters over the past year.

So are we resting on our laurels – or resting at all? Not in the slightest. While frequent, annoying, and financially damaging to business, VAT and court ruling cases are reasonably straightforward: suspended/unsuspended, unimplemented/implemented. Our new leading form of tax cases is more challenging and complex: multi-volume tax audits covering up to seven years, and involving larger sums of reassessments and fines that officials are often reluctant to cancel at administrative appeal.

The Business Ombudsman Council way of solving corporate disputes with state and municipal entities is quicker and cheaper for all concerned than protracted court cases. That's why we're exploring new ways of applying it. Here are three:

- We're working with the STS on Tax Mediation, i.e. procedures for coming to a common understanding of a company's tax situation even before the administrative appeal stage;
- We're working with the City of Lviv on a pilot project to create an administrative appeal mechanism at the municipal level. There are framework provisions for this in the national Law on Administrative Procedure, but they have not yet been tested in practice;
- We're working with the Ministry of Economy on how we can best add value to the government's new pulse.gov.ua business feedback digital platform. Identifying and resolving complex company cases with systemic implications seems to be our niche.

It is by now a commonplace to say that Ukrainian business is adaptable. So is – despite all the grumbling – much of the government and its agencies. For the Business Ombudsman team, our job is, at a systemic level, to help shape that adaptation in a way that frees up entrepreneurial energies, while also evolving along with it to support and serve Ukraine's companies – big and small, domestic and global. Here's to the next decade!



# 1. Q2 2025 in review

## Key performance indicators

In April–June 2025,  
the Business Ombudsman  
Council received

**208**  
complaints

The financial effect  
in Q2 2025 reached

UAH  
**275** mn

The financial  
effect total amount  
accounted for

UAH  
**28**  
bn

Closed

**94**  
cases

Investigation of

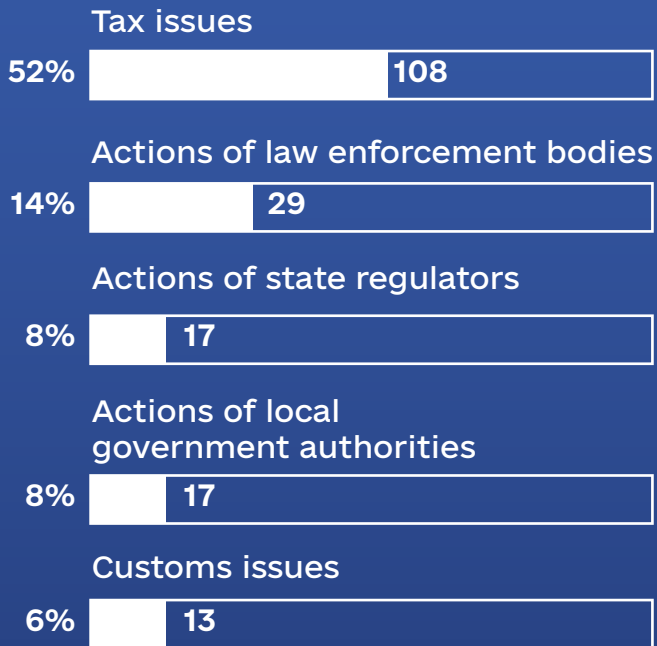
**65**  
cases  
is ongoing

In Q2 2025, the complainants'  
satisfaction level with BOC  
services was

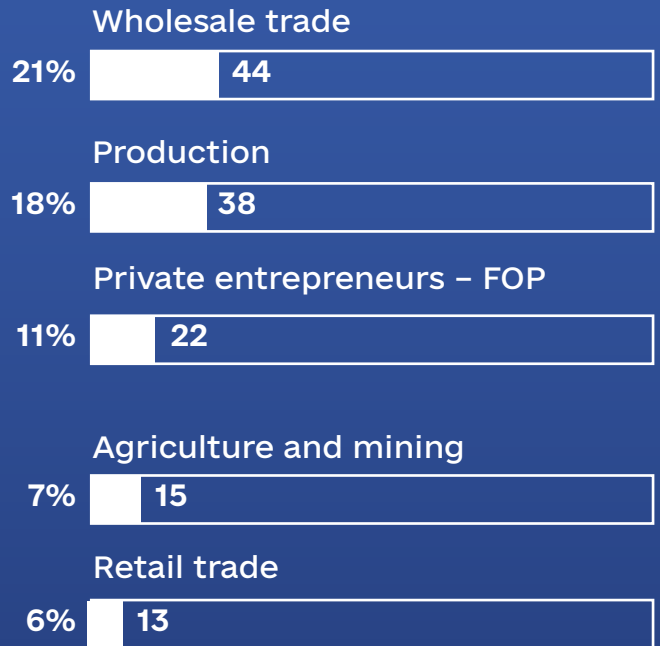
**100**%  
(based on answers  
provided in feedback  
forms).



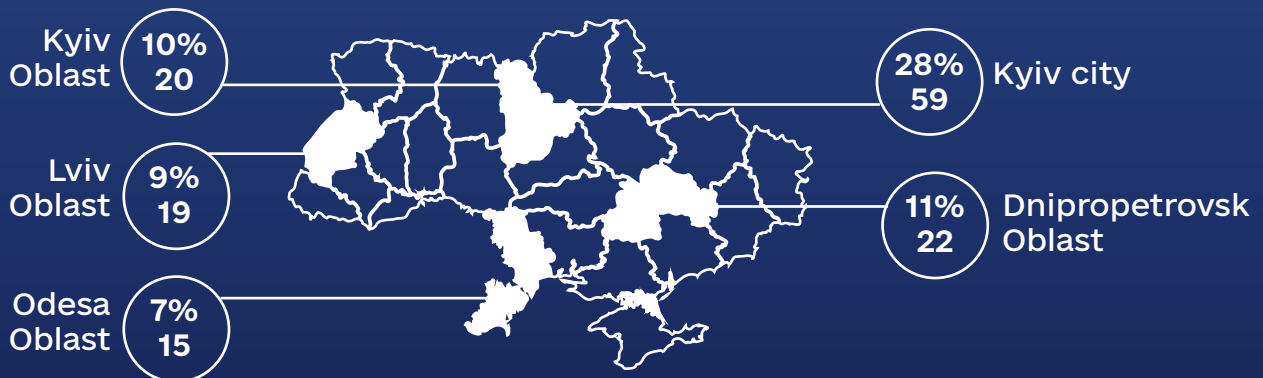
## TOP-5 subjects of complaints



## TOP-5 industries



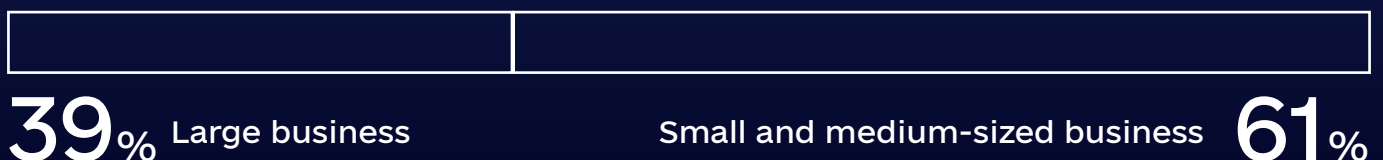
## TOP-5 most active regions



## Origin of capital



## Size of business

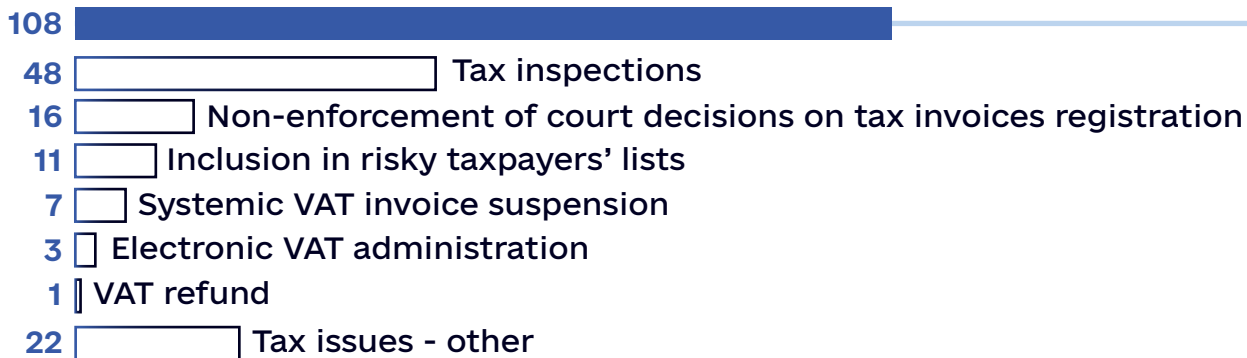


## 1.2 Volume and complaints trends

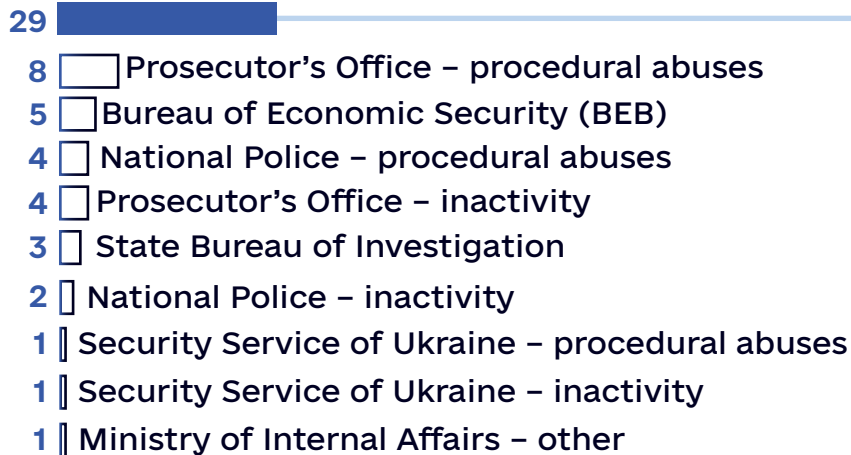
In April-June 2025, the Business Ombudsman Council received

# 208 complaints

### Tax issues



### Actions of law enforcement bodies



### Actions of state regulators



### Actions of local government authorities

- 17 ☒   
 11 ☐ Local councils/municipalities – other  
 4 ☐ Local councils/municipalities – rules and permits  
 2 ☐ Local councils/municipalities – land plots

### Customs issues

- 13 ☒   
 5 ☐ Customs valuation  
 4 ☐ Customs clearance delay/refusal  
 2 ☐ Customs excessive payments refund  
 2 ☐ Decision to change the UCG FEA code

### Legislation drafts/amendments

- 7 ☒   
 4 ☐ Deficiencies in regulatory framework – state regulators  
 2 ☐ Deficiencies in regulatory framework – tax issues  
 1 ☐ Deficiencies in regulatory framework – state regulators

### Actions of the Ministry of Justice

- 6 ☒   
 5 ☐ Department of State Registration  
 1 ☐ Enforcement Service

### Courts

- 3 ☒   
 2 ☐ Courts – other  
 1 ☐ Delays in court proceedings

### Other issues

- 8 ☒   
 2 ☐ State companies – abuse of authority  
 1 ☐ B2B complaints  
 1 ☐ Asset Recovery and Management Agency (ARMA)  
 4 ☐ Other



## Tax issues

### Tax issues

108

In Q2 2025, tax-related complaints topped the list of issues submitted to the Business Ombudsman Council, accounting for half of all appeals – 52%. This represents 8 fewer complaints compared to Q1 2025 and 78 fewer compared to the same quarter in 2024.

There has been a noticeable trend toward a decrease in the total number of tax complaints from businesses.

Q2 2024	186	<div></div>
Q4 2024	172	<div></div>
Q3 2024	165	<div></div>
Q1 2025	116	<div></div>
Q2 2025	108	<div></div>

As the BOC's practice shows, this trend is linked to a decrease in the number of complaints related to issues in SMKOR (the risk assessment monitoring system). This category includes appeals concerning the blocking of VAT invoices, failure to enforce court rulings on invoice registration, as well as inclusion in the list of risky taxpayers.

In April–June 2025, the number of SMKOR-related complaints dropped to 31% (34 complaints), compared to 45% (52 complaints) in Q1 2025 and 66% in Q2 2024, respectively.

The Business Ombudsman Council has been consistently monitoring changes in the SMKOR. Following the results of an own-initiative investigation conducted in 2023, the Council issued recommendations to the Ministry of Finance and the State Tax Service on how to fix the system. The changes were implemented, which made it possible to reduce the number of cases of mass invoice blocking and inclusion in the list of risky taxpayers. This positive dynamics was also facilitated by the willingness of the new leadership of the State Tax Service of Ukraine, starting from early 2025, to implement reforms and reduce administrative pressure on taxpayers. In particular, the Council

notes a certain decrease in the number of complaints regarding non-compliance with court decisions on the registration of invoices. Their number in Q2 2025 decreased to 16 complaints (7%) compared to the same period last year: 51 complaints (27%) in Q2 2024.

The Council assessed the status of implementation of SMKOR-related recommendations on pp. 23-24 of this report.

Alongside SMKOR, one of the most problematic categories remains tax audits. In Q2 2025, complaints related to tax audits amounted to 44% (48 cases), which is significantly higher than in Q1 2025 (21%) and Q2 2024 (29%). This trend can be explained by the resumption of tax audits following quarantine and military moratoriums, and therefore the results of tax audits with which the Council works often relate to periods dating back to 2018-2019.

In July 2025, the Government announced a moratorium on business inspections. In particular, it is expected to limit audits of low-risk business entities and improve the methodology for applying the risk-based approach. The BOC welcomed this step, but cautioned that a one-year pause should not turn into a way of accumulating and postponing problems that could rebound on businesses once the moratorium ends. This period should be used by the state to establish proper regulatory processes that are necessary for both the state and business.

The category of “other issues” included complaints concerning the reflection of tax debt in the taxpayer's e-cabinet, failure to enforce court decisions on VAT reimbursement, restoration of the status of a single taxpayer, revocation of licenses for conducting certain types of business activities, and denial of eligibility for relief from the single tax.

## Actions of law enforcement bodies

29

The Council received 29 complaints about law enforcement agencies, amounting to 14%. This is 9 complaints less compared to the previous quarter and 5 complaints less compared to Q2 2025.

During April-June 2025, entrepreneurs mostly complained about alleged violations committed by law enforcement officers during investigative and procedural actions, the seizure of assets and failure to return temporarily confiscated property, as well as refusals to close criminal proceedings.

The number of complaints regarding the Bureau of Economic Security (BEB) decreased during the reporting quarter. Three out of five complaints received about the actions of BEB were considered by the Council.

The Business Ombudsman Council continues to support the Bureau's reforming, taking into account the requirements of the business community and international experts. The Council welcomed the appointment of the Commission-selected new head of BEB and supports the further of modern analytical methods for investigating economic crimes.

## Actions of state regulators

17

In Q2 2025, the Council received 17 complaints concerning state regulatory authorities, accounting for 8% of all complaints.

Out of five complaints that were taken into consideration, two cases were successfully resolved. In one case, the Council helped cancel a fine of UAH 480k imposed by the Social Protection Fund for Persons with Disabilities. As a result of resolving the second complaint, the company was included in the list of food

exporters to European Union member states and entered into the Register of establishments approved for export to the EU.

In addition, during this quarter the Council continued working on complex systemic issues, including problems related to the import of medical gauze and refusals to issue permits for waste processing operations. Further details on these systemic issues are available on pp. 26-30 of the quarterly report.

## Actions of local government authorities

17

The Business Ombudsman Council received 17 complaints concerning local government authorities. Six of these complaints are currently under the Council's consideration.

The complaints concerned land tax benefits for land plots, enforcement of court decisions, and instances of malfunction by local authorities.

Traditionally, the Council has limited powers to resolve issues arising

from decisions of local government authorities bodies under the provisions of the applicable law. Therefore, the Council directs its efforts toward promoting the Law of Ukraine "On Administrative Procedure," which enables the establishment of complaint review commissions within local authorities. More details on the pilot initiative "Lviv: ZAProvadzhennia" can be found on p. 25 of the quarterly report.

## Customs Issues

13

In Q2 2025, the Council received 13 complaints related to customs issues, accounting for 6% of all complaints. The number of complaints decreased compared to Q1 2025 (by 4 complaints) and the corresponding quarter of the previous year (by 7 complaints).

The Council considered five complaints related to customs value adjustments, one of which was successfully resolved by confirming the customs value of raw materials used in the production of laundry products for children.

The Council also reviewed four complaints concerning delays or refusals in customs clearance of various goods. Within this subcategory, the Council addressed issues related to the import of goods that naturally contain trace amounts of safrole (a controlled precursor substance), as well as a systemic issue regarding the inability to apply the reduced VAT rate (7%) to the import of medical products, specifically medical gauze in rolls.

### 1.3 Timeframe for preliminary review of complaints

In Q2 2025, the preliminary review of business complaints took an average of

**11** working days.

### 1.4 Number of investigations conducted and grounds for dismissing complaints

In Q2 2025, out of 208 complaints, the BOC conducted 94 investigations. 40 complaints remained at the preliminary assessment stage. The Council rejected 82 appeals as not fitting the Council's eligibility criteria foreseen by the institution's Rules of Procedure.

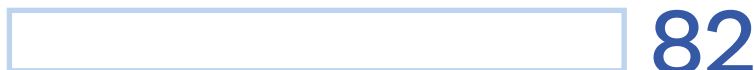
Investigations



Complaints in preliminary assessment



Rejected complaints



## Main reasons for complaints dismissal in Q2 2025

Subject of the complaint is outside Business Ombudsman's competence	50
According to the Business Ombudsman, the Complainant did not provide sufficient cooperation	9
Other circumstances where the Business Ombudsman, in his sole discretion, determines that an investigation of the complaint is not necessary	8
The complaint is ungrounded or other bodies/institutions already consider such a case	6
A complaint relates to an issue that has already been addressed by the Business Ombudsman in his/her previous decisions	3
Complaints subject to any court or arbitral proceedings, or in respect of which a court, arbitral or similar type of decision was made	2
An investigation of a similar case by the Business Ombudsman is pending or otherwise ongoing	2
Failure to meet the complaint form eligibility criteria	1
Complaints in connection with the legality and/or validity of any court decisions, judgments and rulings	1
<b>Total</b>	<b>82</b>

## 1.6 Timelines of conducting investigations

The average duration of investigations was

**89 days.**

The Council complies with the BOC Rules of Procedure.

### Ratio of closed cases by days:

<30 days



12

31-90 days



45

91-120 days



16

121-180 days



15

181+ days

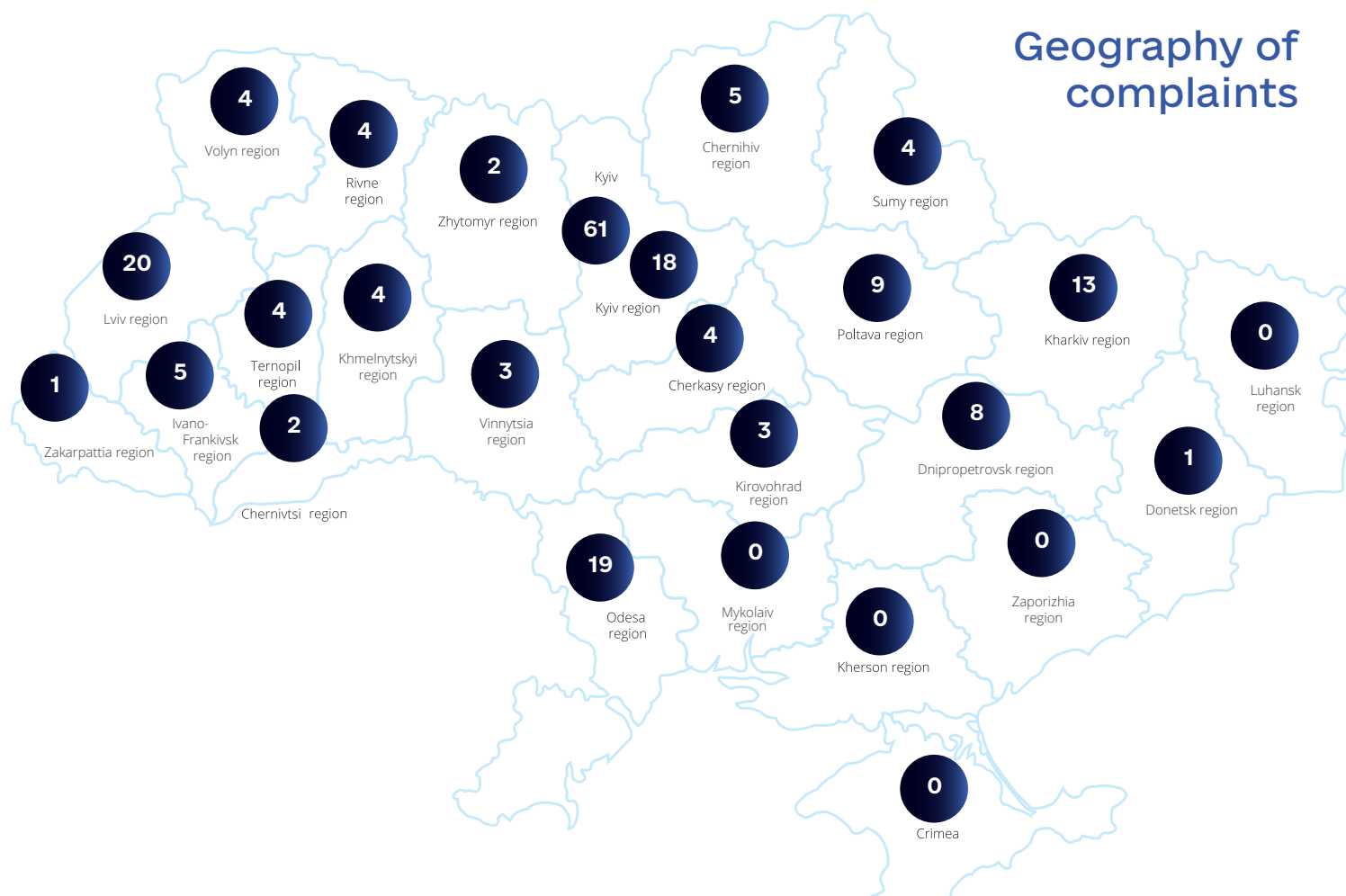


6

**61%**

of all investigations were conducted within 90 days in Q2 2025, thus meeting the requirements of the BOC's Rules of Procedure.

## 1.7 Portrait of a complainant

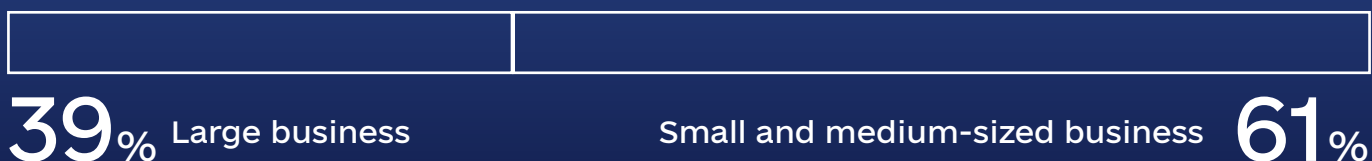


### Origin of capital



Ukrainian companies complain to the BOC the most with a share of 87%. The share of foreign business in Q2 2025 accounted for 13%.

### Business size



Traditionally, more than half of the complaints were submitted to the Business Ombudsman Council by small and medium-sized enterprises representatives. Thus, in Q2 2025, the share of SMEs appeals amounted to 61%, while large businesses – 39%.



### 3. BOC 10 years: mission possible

In Q2 2025, the Business Ombudsman Council celebrated its 10th anniversary – an important milestone symbolizing a decade of systemic work at the juncture of business and state. Over these years, the Council has turned into an influential institution protecting entrepreneurs' rights, promoting business climate improvement and building trust in state institutions.

The anniversary was an occasion not only to summarize achievements, but also to gather a circle of partners with whom we build a fair and transparent economic environment in Ukraine together.





Among the guests were representatives of the Government of Ukraine, the European Bank for Reconstruction and Development, members of the Supervisory Board, trade and industry chambers, diplomatic missions representatives, business associations, expert, legal and business communities.

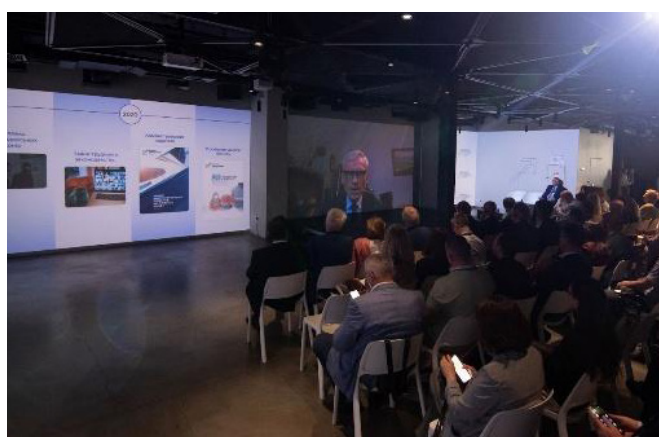
## Event agenda: results and live dialogue



**The first session** was dedicated to the Council's achievements in 10 years of operations. Participants had the opportunity to see how the Council, from an initiative, has become an influential institution investigating not only individual complaints, but also changing the rules of the game at the systemic level.

**The second session** became a lively dialogue with complainants who personally shared their own experience. These cases showed: there is a real story of an entrepreneur behind every case—with challenges, struggles and successful results. And that's exactly such stories that change approaches, build trust and form new quality interactions.

Video messages from former business ombudsmen who shared their own vision of the path that the Council has taken over these years became an extremely valuable part of the event. We were also happy to hear Supervisory Board members, who noted the Council's institutional development and its important role in creating long-term partnership between the state and business.





# 10 years of results and changes



**13800+**

complaints from entrepreneurs across Ukraine

LOOK INTO THE PROBLEM

**9000+**

closed cases

UAH

**28+**

bn

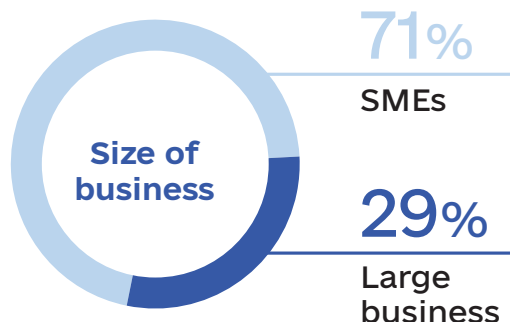
saved for business

**63%**

closed in favor of complainants

**97%**

of satisfied complainants



## TOP-5 subjects of appeals

**58%**

Tax issues

**15%**

Actions of law enforcement agencies

**7%**

Actions of state regulators

**5%**

Customs issues

**4%**

Actions of local government authorities

CONSULT FIRST

## TOP-5 most active regions

Kyiv Oblast

**37%**

Odesa Oblast

**6%**

Kyiv Oblast

**8%**

Kharkiv Oblast

**8%**

Dnipropetrovsk Oblast

**8%**

ON THE SIDE OF JUSTICE





# 10 years

## Eliminating barriers to doing business in Ukraine



We thank the EBRD, the European Union, donor countries, and the OECD for their continuous support helping us grow and strengthen our institutional capacity.

The event was not only a celebration of the past, but also with a view to the future. We clearly see our mission as an effective intermediary between business and the state, a professional partner helping eliminate administrative barriers, improve the regulatory environment and promote our country's investment development.

# 3. On the way to URC

## the Business Ombudsman Council's contribution to Ukraine's recovery and investment environment improvement

The Business Ombudsman Council actively supports business in overcoming consequences of the war caused by full-scale invasion of the Russian Federation and creating favorable business environment for involving the private sector in the country's restoration processes.



### Policy and Recovery

For this purpose, a separate Policy and Recovery Unit within the Council has been set up and led by Tetiana Korotka, the Deputy Business Ombudsman of Ukraine.



### Key areas:

- Supporting the private sector in overcoming Russia's military aggression consequences
- Implementing reconstruction projects, including critical infrastructure ones
- Creating fair and transparent conditions for companies' participation and encouraging investment in restoration initiatives

### In particular, in the reporting quarter, Policy and Recovery Unit focused its attention on the following aspects:

- Reviewing restoration-related entrepreneurs' complaints
- Establishing cooperation with state bodies forming and implementing economic restoration policy
- Analyzing systemic problems in engaging the private sector in recovery and searching for effective solutions
- Preparing for the Ukraine Recovery Conference (July 2025)

## Survey on Ukraine's new investments prospects

Unfolding a new Policy & Recovery focus area, the Council conducted a survey "Ukraine at War: Business Environment Transformation and Investment Prospects".

The purpose of the survey was to find out how businesses evaluate current situation on the market, study foreign business readiness to invest in Ukraine and risks and challenges foreign investors see for entering into Ukrainian market and participating in immediate restoration. The Council's survey respondents became residents of Poland, Germany, Canada, Great Britain, Sweden, France, Bulgaria and Ukraine.

The Council presented the survey report in April 2025. The document combined answers from Ukrainian and international business representatives with the analysis of changes that have taken place since the full-scale invasion outbreak and their impact on companies' activities.

### Main conclusions

- According to the survey, 60%+ of foreign investors are planning to attract up to USD 5 mn of investments to Ukraine. 30%+ companies are ready to invest much bigger amounts - up to USD 100 mn.
- Entrepreneurs note that a key factor in making investment decisions is risks associated with war (69%).
- 38.9% see a negative impact in economic uncertainty, national currency fluctuations and inflation.
- The largest legal and regulatory obstacles restraining investors are: permitting procedures (15.4%), limited access to justice (15.4%), lack of effective political risks insurance (15.4%), corruption (7.7%) and military risks (7.7%).

A separate part of research dealt with private sector participation in public procurement. Unfair competition and contracts performance issues considerably affect businesses trust level and their willingness to participate in tenders.

The survey also contains the Council's proposals on priority changes for investments inflow.



### What is necessary for attracting investment?

Respondents answered as follows:

1. Ensuring access to justice (38.5%);
2. Simplifying administrative and regulatory procedures (30.8%);
3. Creating special economic zones (15.4%);
4. Reducing corruption level and providing tax benefits (7.7%).

The Business Ombudsman Council will use survey conclusions for preparing systemic proposals for the Government of Ukraine.



## Recovery cases under investigation by the BOC

### Case 1: Blocked payment after the state customer reorganization

**Problem:** Over UAH 47 mn left unpaid after state institution reorganization. The debt was neither reflected in the accounting, nor shown on the inventory report, nor handed over to the successor

**Update:** The Restoration Agency reported that relevant arrears were missing in transferred documentation and not included in the financial statement after reorganization.

**BOC actions:** Active communication with the Restoration Agency as for checking source documents and searching for possible solutions is ongoing. This is an example of a complex situation requiring transparent and coordinated financial procedures in handoff processes between government entities.

### Case 3: Refusal to sign certificates after CHPP nationalization

**Problem:** After competing energy infrastructure facility restoration works, a new leadership team, appointed after ownership form change, refused to sign work completion certificates.

**Update:** A part of certificates had been signed before management change, however a payment issue for the rest of works remains unresolved.

**BOC actions:** The Council approached the Cabinet of Ministers of Ukraine with a request to arrange a joint meeting with the participation of all bodies being tangent, so that to provide agreed vision situation and find a way out.

### Case 2: Unpaid UAH 2 bn for protective structures construction

**Problem:** After completing critical infrastructure facilities reinforcement works within a government decree expired at the end of 2024, thus a significant debt amount was left unpaid.

**Update:** The Council is actively communicating with the State Restoration Agency. There is progress in considering possible debt return issue.

**BOC actions:** The work is underway to update the cost construction calculation methodology and clarify legal conditions for similar projects implementation. The Council also got the Cabinet of Ministers Resolution No. 142 of February 7, 2025 adopted which regulates legal aspects of such works performance.

### Case 4: Uncertainty in renewing concession activities

**Problem:** As a result of military actions, concession activity on state property object was actually suspended. There are no clear activities renewal and losses settlement mechanisms in place.

**Update:** In April 2025, a meeting between the complainant, Ministry of Recovery and BOC was held. The parties agreed to create working groups to coordinate further actions.

**BOC actions:** The process of launching the working format between all parties, as well as the relevant solution development is supported

## Participation in public events

### Conference “Construction and Infrastructure: Key Sectors for Economic Growth” (We Build Ukraine)



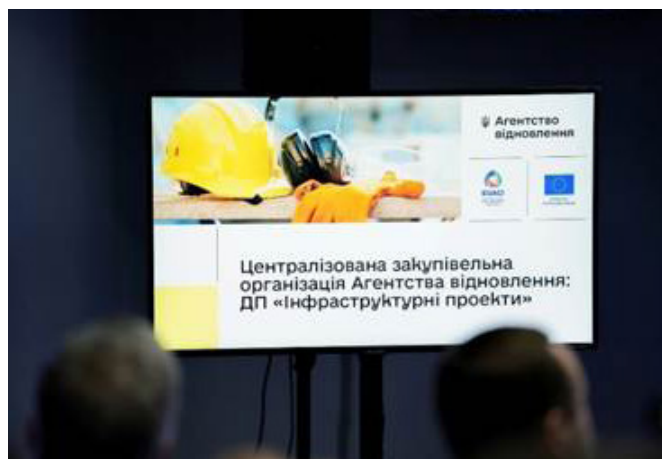
### Presentation of conclusions of the “OECD Review of Integrity and Anti-Corruption in Ukraine”



### Recovery Construction Forum



### Presentation of Centralized Procurement Organizations (CPO)



### Seminar “How can Foreign Companies Participate in Prozorro Tenders and Recovery Projects with International Funding”



## Contacts with international partners

1. A meeting on the occasion of Wolfgang Anzengruber, a newly appointed Austrian Government Coordinator for reconstruction of Ukraine, and official Austrian delegation members visit.



2. A meeting on the occasion of Benjamin Dousa, the Minister for International Development Cooperation and Foreign Trade of Sweden visit.



## Preparing for the Ukraine Recovery Conference



The Business Ombudsman Council annually participates in the international Ukraine Recovery Conference (URC) being a key platform for coordinating efforts of the government, international partners, civil society and business in the state's post-war recovery.

In 2025, the BOC again joined this large-scale event not only as a participant, but also as a platform creator for exchanging ideas and experiences in parallel to the large conferences events.

Thanks to these events, the Council became a platform for an inter-institutional dialogue, where one met with ombudsman institutions representatives, local self-government bodies, international experts and investors. The main goal was to add value to independent mediation between the state, business and the public for the sake of transparent, predictable environment formation in which reforms are being implemented effectively, while investors feel trusted and protected.

Such expansion of the BOC participation format in URC 2025 was a reassurance that the Council continues playing a key role as an independent guarantor of integrity in the process of Ukraine's restoration, as well as an active partner for international communities in supporting the country's reconstruction based on transparency, fairness and legal certainty.

We will tell more about this year's recovery conference in Rome in the next report.





## 4. Problems in the VAT system:

monitoring implementation of recommendations by state bodies based on our own-initiative investigation results

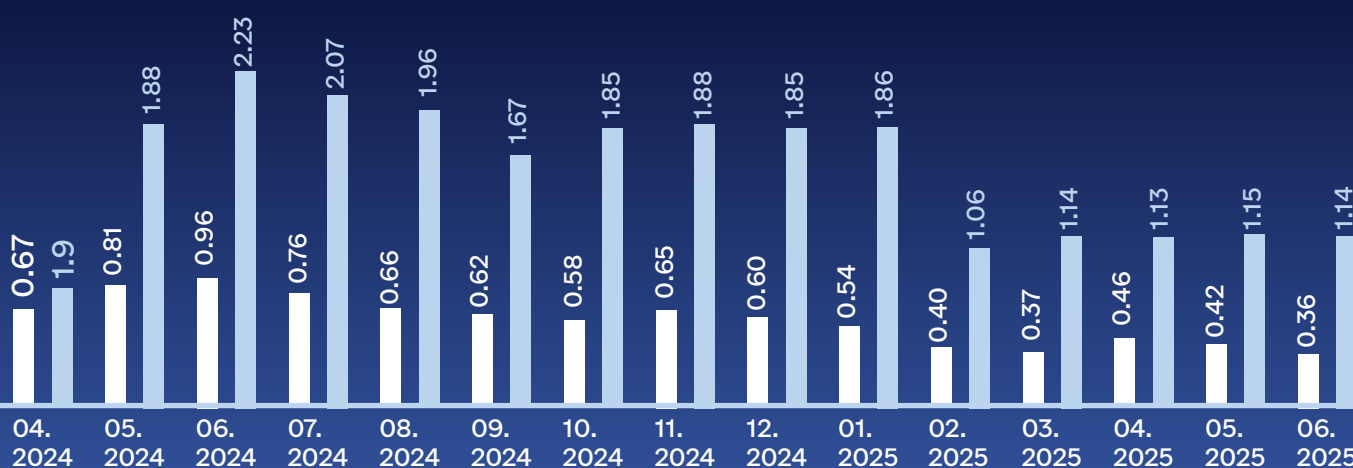
The Business Ombudsman Council is keeping a close eye on monitoring changes in the VAT system and periodically meets with the Ministry of Finance and the State Tax Service to discuss opportunities of eliminating shortcomings in SMKOR and build trust between fiscal authorities and business. Such interaction is caused by high social and economic demand for transparent, fair and predictable VAT administration not creating unnecessary barriers for bona fide taxpayers.

The Council promotes its vision in (previously systemic reports) reports based on its own-initiative investigation results. Having investigated problems in the SMKOR (2023) and tax inspection system (2024), the Council noted shortcomings in the tax system administration and

drew attention to the urgent need to ensure real tax justice and restore trust in the tax system.

According to our own-initiative investigation results on SMKOR, the Council issued recommendations to state bodies on how to improve system functioning. These recommendations, in particular, concerned implementing administrative appeal of a taxpayer's riskiness, refusing to accept data tables, improving of analysis and legislative changes forecasting functions, improving forms of decisions on riskiness of a taxpayer and non-acceptance of data tables, extending positive tax history indicators list, creating regional communication platforms and engaging parliament in giving feedback on business proposals.

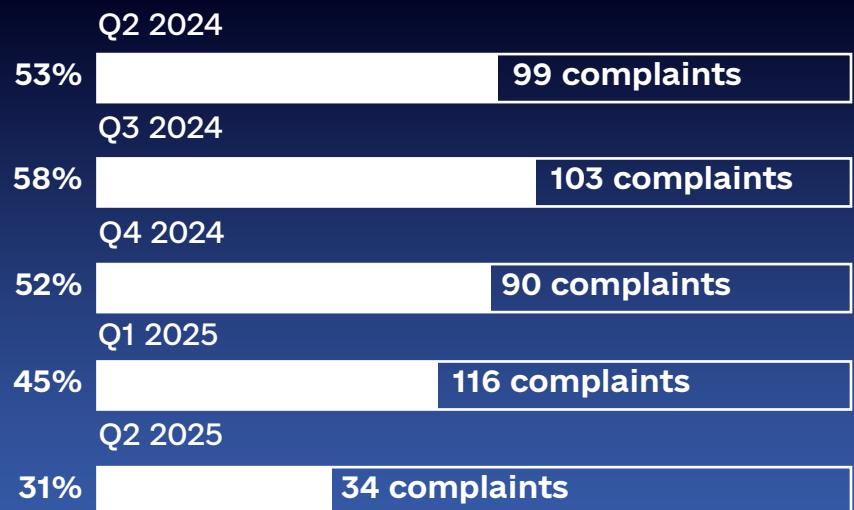
### Dynamics of TIs/ACs registration suspensions and blocked VAT amounts



Percentage of TIs/ACs suspended in SMKOR  
Percentage of suspended VAT

Having analyzed statistics received from the State Tax Service, the Council observes downward trends in tax invoices suspension: in 2025 the number of suspensions gradually decreased and for June 2025 accounted for a record 0.36%. In the first half of 2025, about 7.5% of taxpayers faced tax invoices registration suspension (which is significantly less than in 2024, when about 10% of taxpayers suffered it).

## Dynamics of SMKOR-related business complaints in 2024-2025



In particular, if we look at the statistics of SMKOR business complaints received, the Council is observing a downward trend in complaints about tax invoices suspension in April-June 2025 – 31% versus 45% in the Q1 2025 and 53% in the same quarter of 2024.

A decrease in appeals regarding SMKOR, including invoices registration and court decisions execution shows readiness

of the State Tax Service of Ukraine renewed leadership team to changes marking progress in the implementing the Council's recommendations.

In the spring of 2025, tax officials announced the amendments to Decree No. 1165. At present, the tax authority is collecting feedback from taxpayers, giving a vivid example of putting "Consult First" principle into practice.

### The Council draws attention to SMKOR recommendations still being important for system improvement:

- Intermediate stages before applying adverse consequences to payers;
- Riskiness of the taxpayer: transparency, proportionality, effectiveness of procedures;
- Administrative practice adjustment, taking into account court decisions;
- Key indicators data availability;
- A balanced attitude towards payers and compliance with good governance principles.

Openness of the State Tax Service of Ukraine to dialogue and regular meetings with the Business Ombudsman Council contributes not only to effective entrepreneurs' complaints resolution, but also to the changes that taxpayers have long been waiting for.

On its part, the Council further proposes the State Tax Service of Ukraine its expert and advisory assistance as regards changes in taxes administration and "Consult First" principle implementation, as well as fair law enforcement during tax inspections.



# 5. Administrative procedure:

## implementing the Administrative Procedure Law

The Business Ombudsman Council is involved in implementing the Law of Ukraine “On the Administrative Procedure” (LAP).

As is known, the LAP came into force a year and a half ago, but measures to bring its norms to the life of communities are just the beginning. Its goal is to make the activities of government bodies and local self-government more unified, transparent and predictable, and to provide businesses with ample opportunities to appeal decisions, actions and inaction in a pre-trial procedure with the least resources and time. Therefore, its implementation will boost trust in public administration bodies and improve the quality of relations with the state.

As part of the partnership with the EU4PAR project – the key initiator of the LAP – the Council’s team took an interactive training dedicated to the intricacies of applying the LAP provisions. Thanks to this training, we had a deeper understanding of the principles of the law, considered possible algorithms of action in situations where existing procedures are not yet adapted to its requirements, and also analyzed common mistakes made by state bodies.

We have already started putting the gained knowledge into practice. Jointly with EU4PAR, we combined our efforts to integrate the LAP provisions into the activities of Lviv City Council (LCC), having entitled this tripartite project “Lviv: Implementation”.

The goal of the project is to improve the public administration system at the local level through consistent injection of the Public Administration Law requirements into the work of the Local Administrative Tribunals, as well as to raise awareness of pre-trial alternative dispute resolution mechanisms.

### The main areas of cooperation include:

- improving the practice of issuing administrative acts;
- introducing an effective administrative appeal procedure;
- promoting pre-trial disputes settlement and reducing administrative pressure on business;
- raising awareness of alternative dispute resolution mechanisms, including mediation.

At the initial stage, we focused on data collection: the Council has already held a working meeting with EU4PAR and the LCC, after which it asked the latter for statistics on administrative disputes, typical examples of negative and aggravating decisions. Among our next tasks is to model the future dispute resolution commission at the LCC and conduct a number of practical trainings.

We will tell more about the development of the “Lviv: IMPLEMENTATION” project in the upcoming reports.

# 6. Case-based systemic business issues

The Business Ombudsman Council actively investigates systemic business issues creating obstacles to doing business in Ukraine.

Based on complaints received, the Council analyzes trends in business interaction with government bodies, identifies regulatory obstacles and, by raising systemic issues publicly, seeks ways to resolve them.

The BOC work often involves complex complaints raising red flags in law enforcement, imperfections in legislation, and require decisive action and reasonable decisions.

Thus, in this section, we will provide examples of entrepreneurial cases in which systemic issues have clearly emerged and share progress in resolving them.

## Case 1. From a legal victory to a bureaucratic deadlock: the case of medical gauze in large rolls classification

In April 2024, customs authorities began rejecting to clear medical gauze import in large rolls at a preferential VAT rate of 7%, at which it had been cleared as a medical product for the past 20 years, and began apply a 20% VAT rate. It was the result of an audit of the Accounting Chamber and a letter from the Ministry of Health, which noted that the roll was not a finished product, as it required cutting into smaller pieces. The change in approach to treating gauze came as a surprise to importers, as the Ministry of Health, as a technical regulator, neither issued any public explanations, nor informed importers. The companies learned this news from customs when their goods were refused to be cleared.

Thus, importers lost the opportunity to apply the preferential VAT rate and started suffering significant financial losses: during public procurement, hospitals continued purchasing rolls at a price that included a preferential 7% VAT rate, while imports were cleared at a rate of 20%. It led to leaching of business working capital into a tax credit due

to the difference between the applied rates, which the tax authority did not reimburse.

Producers making bandages, dressings, napkins, etc. of gauze rolls were also at a disadvantage, because 20% VAT paid during import was not offset by tax liabilities from the sale of processed products. Despite the right to a budget refund, enterprises avoided it due to high risks of tax disputes and freezing funds in the tax credit.

The Business Ombudsman Council handled importers' complaints and submitted a reasoned position to the Ministry of Health, the Ministry of Finance, the State Customs Service, and the State Tax Service. In particular, the Council emphasized that:

- The State Medical Service recognized gauze rolls as a medical product, issued a corresponding explanation and included importers in a dedicated register;

- The current medical device classifier did not contain restrictions on the size of a gauze roll;
- Gauze is presumed to comply with technical regulations requirements; accordingly, its medical purpose can be refuted only by studies confirming non-compliance of its physicochemical properties with the European harmonized DSTU standard 14079:2003 requirements;
- In the EU, where an identical standard is applied, gauze in large rolls is considered a medical product;
- This product, even without processing, has its end users - medical institutions;
- For 20 years, gauze in large rolls was recognized as a medical product in various by-laws, and in 2024 it ceased to be so without any regulatory prerequisites.

In May 2025, the Supreme Court in case No. 160/28693/24 recognized the actions of the customs as groundless and stated that gauze in large rolls was a medical

product, and confirmed the right to apply a VAT rate of 7%. This precedent was supposed to create a basis for reviewing the State Medical Service, State Tax Service and the Ministry of Health administrative practice. However, this did not happen: the Tax Office continued refusing to give a budget refund, the Customs Office further refused to clear goods at a preferential VAT rate and did not return the VAT overpayment, despite court decisions in favor of business. The Ministry of Health, in over 3 months of considering the Council's appeal sent to it by order of the Cabinet of Ministers, has not provided any official response to the Council. Law enforcers, for their part, continue prosecuting both business and customs officers for clearing gauze rolls at a preferential VAT rate.

The main consequence of the Ministry of Health's inaction lasting for almost eighteen months, was a significant drop in the number of importers of gauze in large rolls, which threatened a shortage of dressing materials in the warring country market.

## The Council issued systemic recommendations to state bodies, namely:

1. **The Ministry of Finance of Ukraine** – based on the binding conclusions of the Supreme Court set out in the ruling of May 7, 2025 in case No. 160/28693/24, to take steps to correct administrative practice:
  - State Customs Service of Ukraine – to eliminate obstacles in customs clearance of gauze in large rolls at a VAT rate of 7% and to return VAT overpayments in cases where the court canceled refusal cards;
  - The State Tax Service of Ukraine, to eliminate obstacles to budget VAT refund for importers who had to clear gauze in large rolls at a rate of 20%.
2. **The Ministry of Health** to publish an explanation on application of Technical Regulation No. 753 to medical gauze in large rolls, which will take into account the conclusions of the Supreme Court set forth in the resolution of May 7, 2025 in case No. 160/28693/24, and will be general and applicable to medical gauze importers.

## Case 2. Overregulation and corruption risks in the waste treatment sector using the example of complainants' cases

Several companies involved in hazardous waste processing have turned to the Business Ombudsman Council, complaining about the actions of the Ministry of Environmental Protection and Natural Resources of Ukraine (MoEP). The companies complained about the MoEP's unjustified refusals to issue permits for waste processing operations (permits), which caused blocking of the companies' activities.

While investigating the situation, the BOC found that Law No. 2320-IX regulating waste management and brings Ukrainian legislation in this area closer to EU directives, became effective in 2023. The legislation update entailed the need to obtain new permits for all companies in the field of hazardous waste processing, even those ones already engaged in such activities and had the necessary licenses before Law No. 2320-IX came into force.

The complainant companies informed the Council that they had passed a pre-licensing inspection of their material and technical facilities and had received new licenses. However, to continue their business, they also had to obtain permits from the Ministry of Environment. The Ministry of Environment refused to issue permits and gave new reasons every time. Initially, the Ministry of Environment pointed out shortcomings in the documents, and later - the need for them to obtain environmental impact assessment (EIA) conclusions.

During the investigation, the Council learned that the complainants had EIA conclusions or equivalent ecological expert examination conclusions. These conclusions were already examined by the Ministry of Environment

during the pre-licensing inspection, based on the results of which the Ministry of Environment issued new licenses to companies. In addition, the Council found out that the Ministry of Environment, contrary to the requirements of the legislation (para 2 of the Procedure No. 1328), refused to issue permits during the re-examination of companies' applications.

The Council sent a written position to the Ministry of Environment, where it noted the inconsistent behavior regarding sufficiency and acceptability of EIA and environmental expert examination conclusions. In addition, the Council called on the Ministry of Environment to change approaches to law enforcement in the field of hazardous waste processing and comply with the legislation requirements. The Council noted that presently it was extremely important to ensure continuous and stable operation of businesses that manage waste (including hazardous waste), the amount of which is constantly increasing in Ukraine during the war.

In response, the Ministry of Environment, citing the explanation of the State Regulatory Service of Ukraine (SRS), reported that activities assessed by an EIA/ecological expert examination report must meet the requirements of the new Law No. 2320-IX. This meant that companies would need to re-pass the EIA and receive a positive opinion.

According to the BOC, hazardous waste treatment currently appears overregulated, and the requirement to obtain multiple approvals from the same government body - the Ministry of Environment - may create corruption risks.



## The Council issued recommendations to the Ministry of Environment:

- To comply with para 21 of Procedure No. 1328 and the principles of administrative procedure when making a decision based on the results of considering applications for a permit;
- To inform businesses in a timely manner and with due justification about the change in position regarding sufficiency and acceptability of previously obtained permits;
- To adhere to efficiency and balance principles not to administratively burden the work of enterprises operating in the waste management market.

In response to recommendations, the Ministry of Environment reported that the Cabinet of Ministers of Ukraine had given businesses some more time (until September 1, 2025) so that entrepreneurs can adapt to new rules of work in hazardous waste management.

In May 2025, upon the request of the BOC, the State Audit Office informed that in January 2025 it issued an order to the Ministry of Environment to eliminate violations of the requirements of legislation on permitting system in the field of economic activity. According

to the State Audit Office, in May it also appealed to the Prime Minister of Ukraine and asked to instruct the central executive authorities to find out the reasons for the increase in the number of refusals to issue permits during 2024.

Thus, the Council noted the first steps of the state towards improving the situation in hazardous waste treatment. Meanwhile, the Council stopped considering the companies' applications, since their prospects for obtaining permits out of court without undergoing an environmental impact assessment were unlikely due to the firm position of the Ministry of Industry and Trade and expiration of the validity of the previously received environmental impact assessment conclusions.

Despite the disappointing outcome for the complainant companies themselves, the Council continues monitoring changes in the waste management and supports the initiative to introduce an administrative appeal procedure for decisions to refuse to issue permits to provide companies with an effective way to resolve disputes with the Ministry of Environment in a pre-trial procedure.

## Case 3. Decree No. 770 updated: the path to free circulation of food flavorings containing piperonal substance using the example of a company case

The company imported a food flavoring containing piperonal substance into Ukraine. The company provided customs officers with a declaration containing information about the content of piperonal in the mixture and attached the necessary technical documentation. However, the customs refused to clear the product without a permit from the State Medical Service. The customs referred to the Cabinet of Ministers Decree No. 770, according to which the

“piperonal” substance was a precursor, therefore an appropriate import license was required. Thus, the imported product was placed in a temporary storage warehouse.

The customs laboratory took the goods for examination. Its results confirmed the presence of piperonal in flavoring, but noted the lack of methods to determine percentage of its content.

The company emphasized that the

imported flavoring complied with EU technical regulations mandatory for use in Ukraine. When communicating with the anti-smuggling department, the company drew the attention of the customs authorities to the conflict in legislation due to its obsolescence after the EU-Ukraine Deep and Comprehensive Free Trade Area and Association Agreement entry into force.

The company attempted to contact the State Medical Service with a request to confirm that the flavoring containing piperonal substance was not subject to state control measures. The State Medical Service, citing the lack of authority to resolve the issue on the merits, contacted the Ministry of Health (MOH) for clarification. The MOH ultimately confirmed that control measures were not required, indicating that the use of piperonal substance in food additives was in line with European practice.

At that time, the State Medical Service proposed amending the Decree No. 770 and set an allowable % of piperonal precursor in aromatic mixtures, which would not be subject to control. Therefore, the company's activities remained blocked.

The complaint was taken up by the Business Ombudsman Council. Having analyzed the legislation, the Council was convinced that food flavorings with a small content of precursors such as piperonal should be freely circulated in Ukraine, despite their being on the list approved by the Decree of the Cabinet of Ministers No. 770. The Council drew attention to the official position of the Ministry of Health as the main body shaping and implementing state policy in the sphere of circulation of narcotic and psychotropic substances, their analogues and precursors.

In the BOC view, the actions of the State Medical Service appeared inconsistent, discriminating against the complainant

and other importers of products with a low content of piperonal, and also created obstacles to the harmonization of Ukrainian legislation and administrative practices with EU legislation.

The Council proposed holding a joint meeting with the participation of the State Medical Service, the State Customs Service, the Ministry of Health representatives, the complainant, as well as other market participants concerned, to develop a unified position on the circulation of flavorings and food mixtures containing piperonal substance in Ukraine.

Based on its results, the Ministry of Health submitted to the Cabinet of Ministers a draft resolution on amendments to the list of narcotic drugs, psychotropic substances and precursors. On June 11, 2025, the Ministry of Health amended the Decree No. 770. Therefore, the decree was supplemented with a note according to which food flavorings and food additives containing piperonal substance were not subject to the restrictions provided for by the Decree No. 770. At the same time, the State Customs Service requested additional clarification regarding the wording on the natural content of precursors in food products, food flavorings and food additives.

As a result, on July 31, 2025, the State Medical Service provided additional clarification at the request of the State Customs Service. The customs released the complainant's goods into free circulation, which was confirmed to the Council by a company representative. The issue was resolved at the legislative level, so the problem with the import of food flavorings containing piperonal substance was resolved not only for the company that turned to the Council for help, but also for other enterprises using similar products in their economic activities. The case was closed successfully.

## 6. Examples of successfully closed investigations

### Medical Device Packaging Complies with Technical Regulations: A Case Study of an International Company



A Ukrainian enterprise belonging to a well-known international group specializing in the production and sale of pharmaceuticals, healthcare products, and household goods filed a complaint with the Business Ombudsman Council against the State Service of Ukraine on Medicines and Drugs Control (SMDC). One of the SMDC's regional bodies issued a decision stating that the company's manufactured medical devices did not comply with the Technical Regulation on Medical Devices approved by Cabinet of Ministers Resolution No. 753 (Technical Regulation No. 753).

According to the regulatory authority, the violations consisted of the manufacturer placing the instructions directly on the packaging instead of inserting them inside, issues with labeling, and the expiration date being indicated in an "incorrect" format. As a result, the authority insisted on the need to bring the products into compliance with the established requirements.

The company attempted to independently communicate with the SMDC at the central level to clarify the situation but received no response. Having previous positive experience cooperating with the Business Ombudsman Council, the company submitted a complaint to the institution.

The Council thoroughly examined the case and supported the company's position in addressing the SMDC and the Ministry of Health (MoH).

The Council emphasized that the format of the usage instructions and the depiction of the "manufacturer" symbol complied with international standards and, therefore, also met the requirements of Technical Regulation No. 753. Regarding the expiration date format, the Technical Regulation does not specify the procedure or sequence for indicating such dates. Furthermore, it turned out that the MoH had previously issued clarification regarding the application of Technical Regulation No. 753 in such cases. In this clarification, the MoH did not object to the correctness

of placing the instructions on the inner side of the packaging or to the indication of the expiration date in the format used by the manufacturer, namely “month. year.”

As a result of the Council’s communication with the SMDC, the decisions stating non-compliance of the medical devices with Technical Regulation No. 753 were canceled.

## How the Business Ombudsman Council Helps Improve Communication on Issuing EUR.1 Certificates



A textile manufacturing company approached the Business Ombudsman Council with a complaint. The company was unable to obtain an EUR.1 certificate from customs, which is required for exporting goods from Ukraine.

Customs authorities argued that the company’s products did not meet the criteria for heading 60 under the Regional Convention on Pan-Euro-Mediterranean preferential rules of origin.

The Complainant independently identified that the Ukrainian translation of the Convention deviates from the original English version, which caused confusion and difficulties in obtaining the certificate. To support the complainant, the Council advised the company to submit an official request in order to receive a written decision regarding the EUR.1 certificate. After sending this request to the regional customs office and following several consultations, the company was issued the EUR.1 certificate.

Following the successful issuance of the certificate, the company asked the Council to facilitate additional communication to ensure that similar issues would not arise during future shipments.

In an effort to prevent similar situations in the future, the Business Ombudsman Council initiated a discussion with the State Customs Service of Ukraine. As a result, the Customs Service confirmed that the English version of the rules would be applied going forward when issuing EUR.1 certificates, which reduces the risk of misinterpretation for exporters.

After the company successfully obtained EUR.1 certificates for several export shipments, and the consistent application of this approach was confirmed by the Customs Service, the Council closed the case, considering the issue resolved in favor of the complainant.



## With BOC's Facilitation, the Tax Authority Cancels Nearly UAH 9 mn in Additional Payments



A company engaged in the wholesale trade of petroleum products filed a complaint with the Business Ombudsman Council. The tax authority had accrued additional payments for the company totaling nearly UAH 12 mn, including corporate income tax, VAT, and excise tax.

The main claims of the tax authority concerned doubts about the reality of the company's transactions involving the purchase and subsequent sale of fuel to counterparties. Tax officials also argued that the company had failed to coordinate the transportation routes of the fuel deliveries with the National Police. Furthermore, the tax authority noted that some of the company's counterparties were mentioned in criminal proceedings or were included in the lists of "risky" taxpayers.

During the complaint review involving representatives of the State Tax Service of Ukraine, the company, and the Business Ombudsman Council, a Senior Investigator of the Council expressed well-reasoned support for the company's position. She emphasized that the company had submitted a complete set of primary documents confirming the reality of all business transactions challenged by the tax authority.

Additionally, the Council and the company jointly compiled an extra set of evidence to demonstrate that, under current legislation, transportation routes for diesel fuel (the subject of the disputed deliveries) do not require approval by the National Police. Therefore, the tax authority's allegations regarding the fictitious nature of the transactions were premature and unfounded. The information about the counterparties' risk status emerged only after the transactions had taken place and thus could not be considered evidence of the company's bad faith. These arguments were thoroughly detailed by the Council in an official letter to the State Tax Service of Ukraine.

As a result of the review, the State Tax Service took into account the company's position supported by the Council and partially cancelled additional payments in the total amount of over UAH 8.94 mn, which represents 75% of the disputed charges.

Since the tax authority's decision is not subject to further pre-trial appeal, the Council closed the case following the achievement of a positive outcome for the complainant.

## Honey Exporter Saves an International Contract Thanks to the Business Ombudsman Council's Support



Honigma LLC, a small enterprise from the Lviv region, specializes in honey processing and primarily exports its products to Canada. The company had obtained all the necessary documentation confirming the legality of its operations and the quality of its products, including certification for future exports to the EU. However, it encountered an unexpected obstacle: it was added to the list of risky taxpayers. As a result, the company was forced to halt the export of a container of honey, putting a major international contract and the business itself at risk.

Despite multiple appeals to the tax authority, accompanied by a complete set of supporting documents and detailed explanations, the company kept receiving rejections. Moreover, the requirements for the documentation package kept changing, making it significantly more difficult for the company to defend itself effectively.

That's when the business turned to the Business Ombudsman Council for help. The Council initiated persistent communication with the tax authority. In particular, it organized a discussion of the case within the framework of the Expert Group, which enabled a constructive dialogue between the company and the tax authority.

During joint efforts, it was revealed that the tax authority had concerns regarding the correlation between the volumes of honey purchased and sold. At the tax authority's initiative, a mini-audit and a quantitative reconciliation of goods were conducted together with the company. The audit confirmed that the declared volumes of raw materials and finished products were accurate. The reason the risk assessment algorithm was triggered was due to an incorrectly filled classifier of goods in one tax invoice for honey processing services.

After the final set of documents was agreed upon and submitted, the tax authority confirmed that the company did not meet the criteria for being classified as risky. Consequently, the company was removed from the list of risky taxpayers, the Council successfully closed the case, and Honigma LLC's container of honey was shipped to Canada.

## UAH 430k in Additional Payments Cancelled with Support from the Business Ombudsman Council



A company engaged in the production and sale of paint and varnish materials turned to the Business Ombudsman Council with a complaint against a decision by the tax authority. Following a scheduled documentary audit, the Main Department of the State Tax Service in Dnipropetrovsk region issued six tax notifications-decisions totaling over UAH 530k.

The tax authority cited several alleged violations, including overstated expenses for fuel and lubricants, use of fuel for non-business purposes, and storage of fuel for personal use without the required licenses. Additionally, the tax office claimed that the company failed to report taxable assets more than ten years ago.

During the audit, tax inspectors also concluded that the company had allegedly overstated expenses related to the repair of roofs on two warehouses damaged by shelling. All arguments by the tax authority in this episode concerned the complainant's contractor. In particular, the tax officials believed that the contractor was physically unable to carry out the work due to the lack of necessary equipment and staff and that the contractor had not submitted the 20-OPP form.

The company appealed the tax notifications-decisions to the State Tax Service of Ukraine and sought support from the Council. After analyzing the complaint materials, the Council provided a well-grounded position on each episode and joined the administrative appeal process.

As a result of the review, the State Tax Service of Ukraine partially upheld the complaint, canceling four out of six decisions, including the one related to roof repairs, for a total amount exceeding UAH 430k.

## Over UAH 14.5 mn in Additional Payments Cancelled: How the Business Ombudsman Council Helps a Food Supplier



A company supplying food for transport services turned to the Business Ombudsman Council with a complaint about the actions of the Main Department of the State Tax Service (STS) in the Kyiv region. Following a scheduled on-site audit, the tax authority concluded that the company had understated corporate income tax and personal income tax (PIT). The business disagreed with this position, arguing that the audit failed to properly take into account key circumstances. The company filed a complaint with the STS of Ukraine and sought support from the Council.

The Council launched an investigation into the matter, analyzing the audit report, tax notifications-decisions, and sending an official appeal to the STS of Ukraine urging for a fair and comprehensive review of the case. Given the complexity of certain aspects, the Council's Senior Investigator insisted on holding an administrative hearing to present the company's arguments in person. The tax authority agreed to this format, and the hearing took place with the Council's participation.

As a result, the STS of Ukraine fully cancelled the decision concerning corporate income tax and partially cancelled the PIT and military levy additional payments. In its decision, the tax authority specifically noted that it had taken into account the Council's arguments – particularly regarding the unjustified conclusions about foreign exchange differences that, according to the inspection, had affected the company's financial results.

Thanks to the Council's involvement, the total amount of cancelled additional payments exceeded UAH 14.5 mn.

## 8. Cooperation with stakeholders

### 8.1 Expert groups

Expert groups serve to promptly discuss specific business cases received by the Council. These meetings help the Council to communicate directly with officials, clarify the positions of the parties involved, coordinate approaches to problem-solving, and facilitate the quicker resolution of entrepreneurs' inquiries.

	Amount of meetings in the reporting quarter	Amount of cases considered in the reporting quarter
State Tax Service	3	38
Prosecutor General's Office	1	9

### 8.2 Cooperation with the Ministry of Economy within the Pulse platform

The Business Ombudsman Council closely cooperates with the Ministry of Economy of Ukraine in simplifying the regulatory environment and creating favorable conditions for doing business.

In 2024, the Ministry of Economy of Ukraine initiated the launch of the "Pulse" platform. The purpose of the "Pulse" platform is to collect feedback from business representatives regarding their interaction with government authorities and to improve the quality of public service delivery.

To process business inquiries and systematize entrepreneurs' feedback, the Business Ombudsman Council has been invited to participate in the

analytical review of business appeals submitted through the "Pulse" platform.

The Council has full access to all information received through the platform for the following purposes:

- analytical review of business inquiries,
- selection of business inquiries for processing under the existing complaint-handling procedure of the Business Ombudsman Council,
- identification of systemic issues faced by businesses and providing recommendations to government authorities on how to resolve them.



## 8.3 Visit to Lviv



### Meeting with Lviv mayor Andrii Sadovyi

During his trip to Lviv, Roman Waschuk met with Mayor Andrii Sadovyi. The main topic of discussion was strengthening cooperation between institutions to improve the business climate in the city. Particular emphasis was placed on the need to establish an effective mechanism for administrative appeals at the local level. This approach will help ensure the practical implementation of the principles of good governance.



### Meeting with Lviv IT Tech Cluster co-founder Andrii Makhnyk

Continuing the dialogue with the Lviv IT Cluster, Roman Waschuk presented the findings of the Business Ombudsman Council's own-initiative investigation "Tax Incentives: How Ukrainians Can Retain Their Defense Industry Market," dedicated to preserving and developing the national defence industry potential. During the conversation, the parties discussed how changes in tax regulation can effectively support Ukrainian manufacturers and repairers of military equipment, thereby strengthening the private defence sector.

### Meeting with members of the Ukrainian Business Brotherhood



The Business Ombudsman met with the entrepreneur members of the Ukrainian Business Brotherhood. Roman Waschuk presented the key areas of the Council's work, in particular, how it helps entrepreneurs resolve issues in their interaction with government authorities. He also shared the results of the Council's latest reports and own-initiative investigations into systemic business problems.

## Visit to Honigma company

The Business Ombudsman, Roman Waschuk, visited Honigma – a company that had filed a complaint with the Business Ombudsman Council regarding the actions of supervisory authorities. Thanks to the Council’s effective intervention, the company succeeded in having its “risky taxpayer” status removed. During the meeting, Roman Waschuk discussed the current situation with the company’s management, as well as the challenges businesses face due to changes in state regulation. More details about this case can be found on the p. 34 of the report.



## 8.4 Familiarizing students with the work of the BOC



The Business Ombudsman Council hosted the finalists of the UP2025 student competition – active members of legal clinics from Ukrainian universities. During the meeting, students were introduced to the Council’s activities, discussed typical business complaints, the specifics of complaint review, and the legal challenges entrepreneurs face when interacting with government bodies.

The Council’s investigators shared their experience, emphasized the importance of values such as transparency, accountability, and efficiency, and answered the students’ questions. The lively dialogue highlighted how quality education and the active civic engagement of students can contribute to forming a new generation of legal professionals capable of driving systemic change in the country.



## 8.5 Events Calendar

**1.04.2025**

Nomination Committee Meeting

**Organizer**

Ministry of Economy of Ukraine

**3.04.2025**

Ukraine Invest Webinar on Attracting Foreign Investment

**Organizer**

Ukraine Invest

**3.04.2025**

Workshop "From Recommendations to Implementation"

**Organizer**

OECD and GIZ

**4.04.2025**



Denmark-Ukraine Business Conference in Lviv

**Organizer**

Danish-Ukrainian Business Association

**4.04.2025**



USUBC-BUCC Business Forum "International Development Institutions Supporting Investment and Regional Development in Ukraine: On the Road to the Ukraine Recovery Conference 2025 in Rome"

**Organizer**

U.S.-Ukraine Business Council

**8.04.2025**



Opening of Norwegian-Ukrainian Business Hub and NUCC's Offices in Kyiv

**Organizer**

Norwegian-Ukrainian Chamber of Commerce (NUCC)

**10.04.2025**

EY Entrepreneur of the Year Ceremony

**Organizer**

Ernst & Young

**10-11.04.2025**

EU-Ukraine Business Summit: On the Road to the Ukraine Recovery Conference 2025

**Organizer**

European Commission and European Business Summits

**11.04.2025**



III Anti-Corruption Forum

**Organizer**

Ukrainian Bar Association

**14.04.2025**

Nomination Committee Meeting

**Organizer**

Ministry of Economy of Ukraine

**15.04.2025**

Meeting with Deputy Minister of Communities and Territories Development Maryna Denysiuk

**Organizer**

Ministry of Communities and Territories Development

**16.04.2025**



Recovery Construction Forum Ukraine 2.0

**Organizer**

Confederation of Builders of Ukraine

**22.04.2025**



XII Business & Legal Tax Forum

**Organizer**

Yurydychna Praktyka publishing house

**23.04.2025**



Empowering Ukrainian SMEs for Nordic Success

**Organizer**

Norwegian-Ukrainian Chamber of Commerce (NUCC)



**5.05.2025**

Meeting with President of the Association «Ukrvodokanalekolohiya»  
Dmytro Novytskyi  
**Organizer**  
Association «Ukrvodokanalekolohiya»

**7.05.2025**

Meeting with the Cabinet of Ministers of Ukraine  
**Organizer**  
Cabinet of Ministers of Ukraine

**7.05.2025**



Ukraine Economic Outlook 2025 by OECD: Expert Discussion with International Organizations and Think Tanks  
**Organizer**  
Kyiv School of Economics (KSE)

**7.05.2025**



Presentation “Findings from the OECD Review on Integrity and Anti-Corruption in Ukraine”  
**Organizer**  
NACP & OECD

**9.05.2025**

Nomination Committee Meeting  
**Organizer**  
Ministry of Economy of Ukraine

**15.05.2025**



Meeting with UNIC Team  
**Organizer**  
Ukrainian Network of Integrity and Compliance

**20.05.2025**

Meeting with Deputy Minister of Economy of Ukraine Oleksandr Tsybort  
**Organizer**  
Ministry of Economy of Ukraine

**23.05.2025**

Crisis Headquarters Meeting  
**Organizer**  
Ukrainian Union of Industrialists and Entrepreneurs (UUIE)

**23.05.2025**

Meeting with Director of the Department of Economic Development of Lviv City Council Inna Svystun  
**Organizer**  
Lviv City Council

**26.05.2025**

Meeting with the Office of the President  
**Organizer**  
Office of the President

**28.05.2025**

Roundtable: “Legislative Regulation of Pre-trial Investigation Deadlines and Criminal Proceedings Closure”  
**Organizer**  
Office of the Deputy Prime Minister for European and Euro-Atlantic Integration with Council of Europe Office in Ukraine

**30.05.2025**

Forbes Money Forum  
**Organizer**  
Forbes

**4.06.2025**

Meeting with the State Tax Service of Ukraine on tax mediation  
**Organizer**  
State Tax Service of Ukraine (STS)

**4.06.2025**

Meeting with the Ministry of Economy of Ukraine on the Pulse platform  
**Organizer**  
Ministry of Economy of Ukraine

**5.06.2025**

Conference “Europe–Poland–Ukraine: Cooperate Together’25”  
**Organizer**  
Union of Entrepreneurs and Employers of Poland (ZPP)

**6.06.2025**

Meeting with Ambassador of Finland to Ukraine Tarja Fernández and the Finnish Business Group  
**Organizer**  
Embassy of Finland in Ukraine

**10.06.2025**

Meeting with EBRD Vice President for Policy and Partnerships Mark Bowman

**Organizer**

EBRD

**10.06.2025**

Nomination Committee Meeting

**Organizer**

Ministry of Economy of Ukraine

**12.06.2025**

Roundtable: “Control Without Pressure: How to Build Trust Between Business and the State During the War”

**Organizer**

Bureau of Economic Security of Ukraine (BES)

**13.06.2025**

II Investment Forum

**Organizer**

Ukrainian Bar Association

**13.06.2025**



Meeting with Deputy Prime Minister for European Integration — Minister of Justice of Ukraine Olha Stefanishyna

**Organizer**

Ministry of Justice of Ukraine

**17.06.2025**

Forum “Human Capital Dimension at the URC 2025. Focusing on Return and Recovery”

**Organizer**

Ministry of National Unity of Ukraine

**17.06.2025**



KIEF Talks: “New Rules of the Game: Tax as a Service”

**Organizer**

Kyiv International Economic Forum

**24.06.2025**

Nomination Committee Meeting

**Organizer**

Ministry of Economy of Ukraine

**25.06.2025**



UNIC Award Ceremony 2025

**Organizer**

UNIC

**25.06.2025**

Forum “Government and Business: From Dialogue to Partnership”

**Organizer**

Office of the President of Ukraine, Ministry of Economy, Government of Switzerland, UNDP in Ukraine

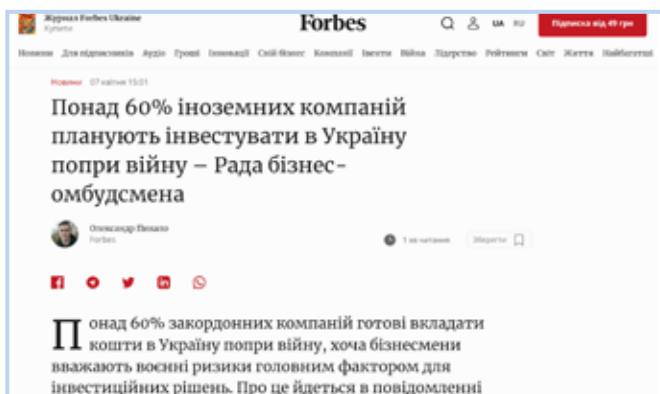
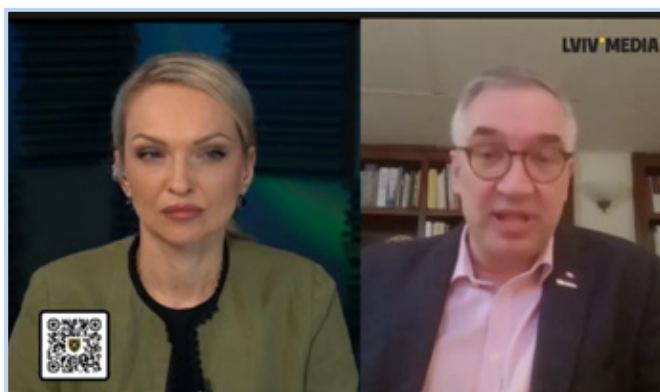
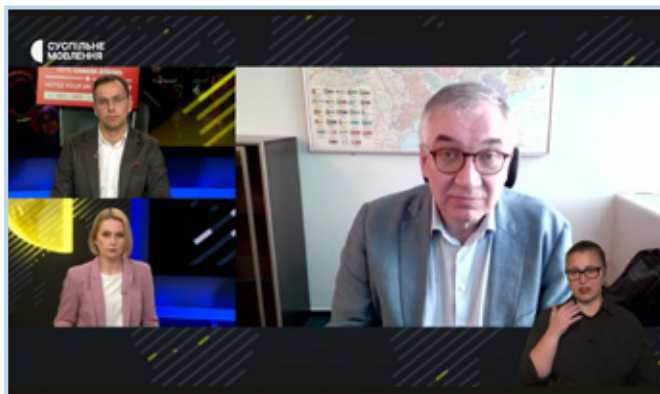
**30.06.2025**

Meeting with American Chamber of Commerce Member Companies

**Organizer**

American Chamber of Commerce

## 8.6 Cooperation with the media

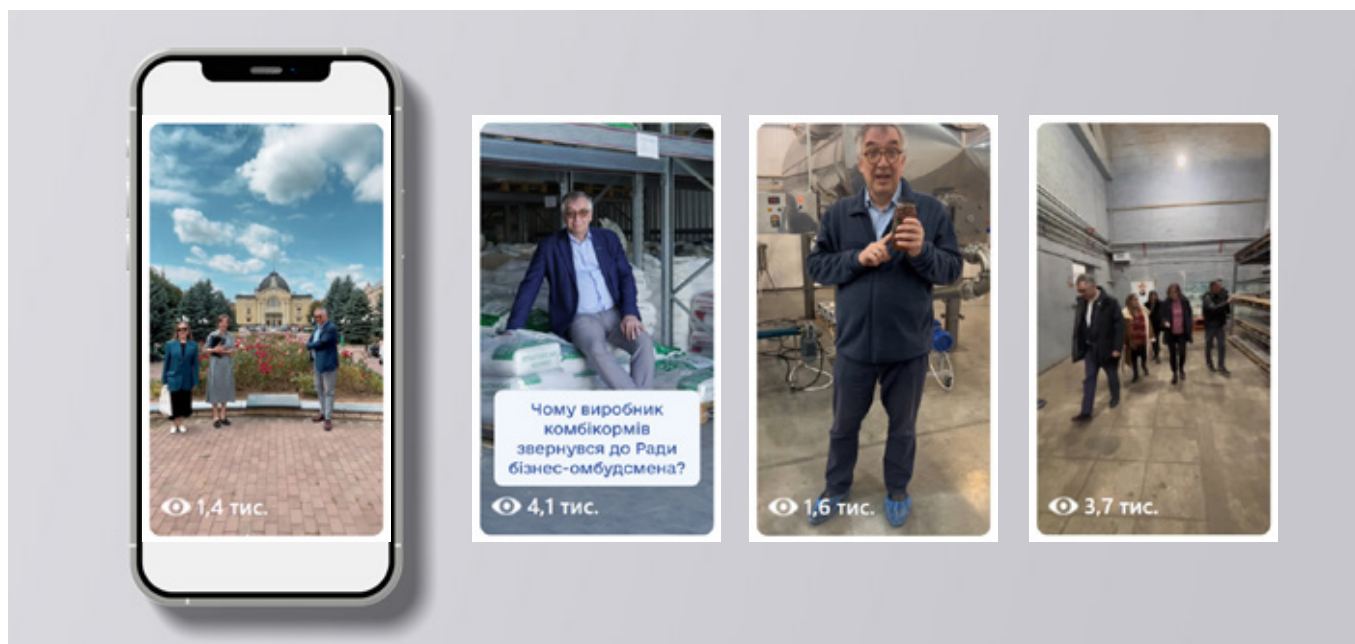




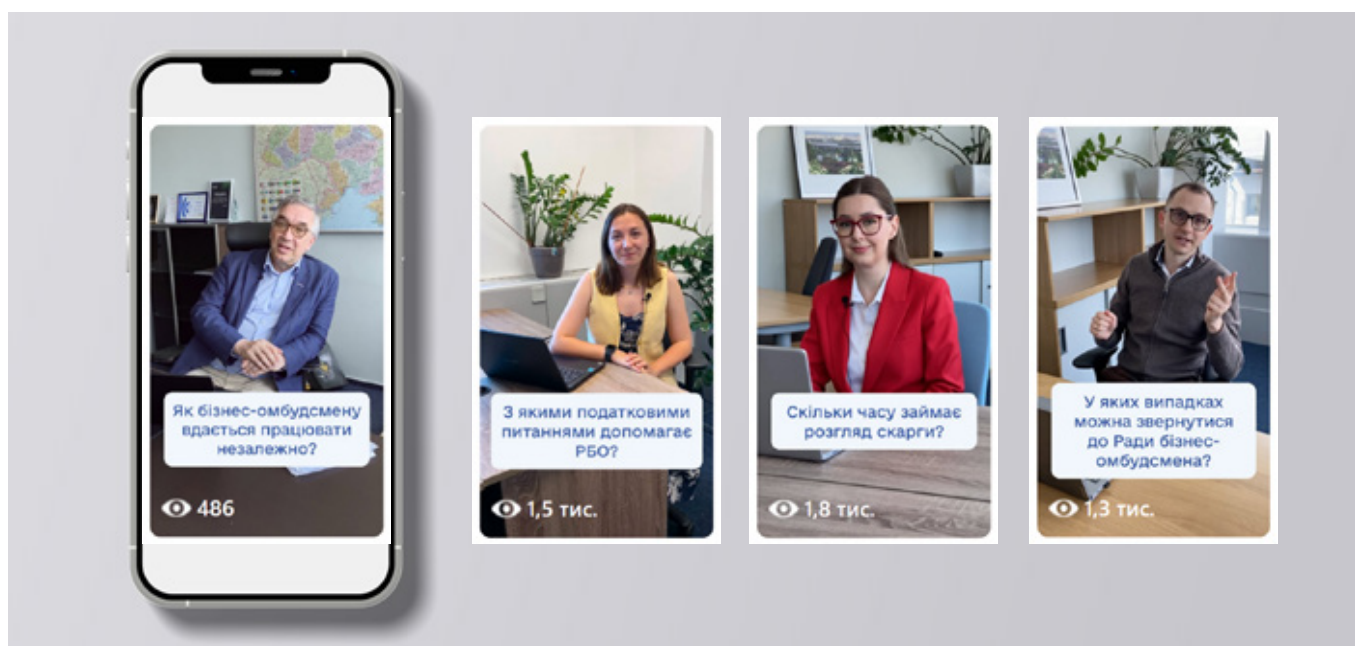
## 8.7 BOC in social media

For increasing communication with the audience and expand awareness about the BOC, we are creating new forms of content in social media.

We regularly post videos about our meetings with business and regional visits.



A special attention is paid to reels-making on the mechanism of the BOC's complaint's handling. Among them are videos on following topics: who can turn to the Council, when and how to lodge a complaint, timeframes for complaints review and investigation, typical subjects of complaints, instruments to protect the legal business rights etc.



Stay tuned for more  
on BOC's social media:





# Eliminating barriers to doing business in Ukraine



[www.boi.org.ua](http://www.boi.org.ua)