



Business
Ombudsman
Council

Quarterly report

January-March 2026

www.boi.org.ua



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.



European Bank
for Reconstruction and Development

 Austria	 the Netherlands
 Denmark	 Norway
 Finland	 Poland
 France	 Slovenia
 Germany	 Sweden
 Italy	 Switzerland
 Japan	 the United Kingdom
 Latvia	 the United States

Companies whose names are mentioned in the report gave permission to disclose their names.

Foreword



Anka Feldhusen,
Business Ombudsman

A handwritten signature in black ink that reads "A. Feldhusen".

On February 2, I took over from Roman Waschuk as Business Ombudsman Ukraine. I was met by a dedicated team that has helped me settle into my new role smoothly, while continuing our work on “eliminating barriers to doing business” in Ukraine – our overarching goal. For this I thank the whole team of the Business Ombudsman Council!

Since I started working in Kyiv, the number of complaints we have received has gone up. I take this as a good sign: businesses large and small, Ukrainian and foreign alike, trust us as an independent institution that can help companies settle disputes with state institutions quickly, unbureaucratically and cost-efficiently.

In all my introductory meetings with stakeholders, businesses and state institutions, I have felt the results of more than a decade of close collaboration – a relationship in which my team meets regularly with both sides, and where direct, fast channels of communication already exist. This long working relationship enables the BOC not only to resolve concrete cases, but to advise on more systemic issues. Some of our recommendations have been implemented over the years – many in the tax sphere – so that entire categories of complaints have sustainably declined, such as those linked to the SMKOR system.

With a growing number of complaints, we hope to identify further sectors where systemic solutions

can have a similarly positive effect. The same applies to recommendations in the recovery sector, where improvements can lead directly to more private investment – indispensable for the ongoing reconstruction taking place in Ukraine while the brutal Russian war of aggression continues with daily attacks.

During my first visits to the regions of Ukraine, I witnessed how businesses, in the fifth year of the full-scale war and despite all the challenges, adapt every day: caring for their workers, generating profits and paying taxes.

Read about all of this in our first quarterly report of 2026!

I look forward to cooperating with all our stakeholders over the next two years.

1. Investigations: Key Indicators

Q1 2026
Overview



226
complaints
received

120
cases
closed



100%

satisfaction rate with
the BOC services



UAH
548.8
million

(€10.8 million)
saved for business

according to the average monthly UAH/EUR
NBU exchange rate (January-March 2026)

UAH
32
billion

(€1 billion)
total financial impact

according to the average annual UAH/ EUR
NBU exchange rate (2015-2026)

Top-5 complaint categories and trends



1. Tax issues

Tax audits top the ranking of tax-related issues. The number of complaints regarding audits increased from 30 in the previous quarter to 50 in the first months of 2026. In particular, businesses are facing repeated inspections.

The Council received 27 complaints in the SMKOR category (invoice blocking, inclusion in lists of risky taxpayers, non-enforcement of court decisions on invoice registration), which accounts for 24% of tax-related complaints and is the lowest share since the invoice-blocking crisis in 2022.

The category of other issues is also common. In Q1, the Council handled complaints related to cancellation of single taxpayer status, existence of tax debt, unjustified tax assessments (including land tax), and loss of primary documents.

2. Law enforcement authorities

Complaints against law enforcement remain at the same level as in the previous quarter. Most complaints concerned procedural abuses and inaction by the National Police and the Prosecutor General's Office. There were also complaints against the Bureau of Economic Security (BEB).

3. State regulators

Complaints related to regulatory matters. Cases handled by the Council included inspections by Ukrtransbezpeka, obtaining permits for international transportation/cross-border waste transport, and delays in reviewing applications for recognition as a critically important enterprise.

4. Customs issues

Complaints in the customs area concerned adjustment of customs value (6 complaints) and delays in customs clearance of goods at the border (8 complaints).

5. Local government authorities

The Council took on 8 complaints regarding actions of local government bodies, particularly related to land allocation. 3 complaints are being handled by the Policy and Recovery Team.

Expanding the circle of active stakeholders

BEB

The Council observed a slight increase in complaints about BEB compared to Q4 2025. Businesses main concerns were about the failure to return temporarily seized property, inaction of law enforcement bodies during the pre-trial investigation, procedural violations, in particular, failure to comply with pre-trial investigation reasonable timelines, etc.

ARMA

In the reporting quarter (March 2026), the first Expert Group on ARMA was held, where both systemic issues and individual complaints were discussed, particularly on the receipt of property purchased by buyers at an auction, etc.

Ukrtransbezpeka

In the reporting quarter, the Council noted an increase in the number of complaints about regulatory issues, among which appeals against decisions, actions or inaction of Ukrtransbezpeka can be highlighted, which showed an increase in the regulatory burden and law enforcement issues in this area.

Ministry of Economy, Environment and Agriculture of Ukraine, State Labor Service of Ukraine

The Council noted the emergence of complaints about import and export licensing, as well as legal regulation issues in industrial safety and labor protection areas.

Expert Group Meetings

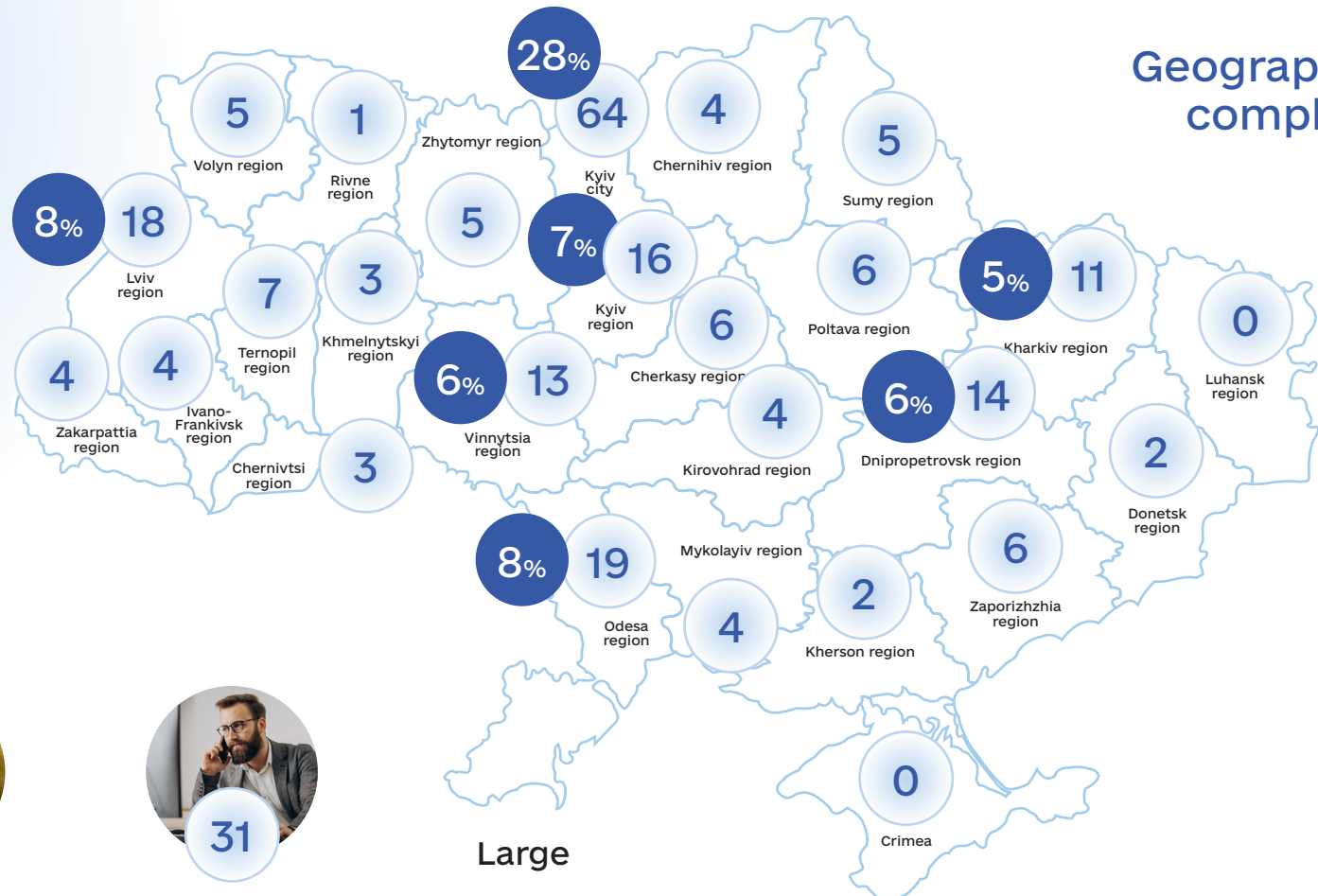
	State Tax Service	State Customs Service	Prosecutor General's Office
Number of meetings in the reporting quarter	3	1	1
Number of cases considered in the reporting quarter	107	4	9

List of complaints by subject

Tax issues	114	Actions of local government authorities	12
Tax inspections	50	Local councils/municipalities – land plots	6
Tax other	31	Local councils/municipalities other	5
VAT risky taxpayer	12	Local councils/municipalities – investment disputes	1
VAT invoice systemic suspension	9		
Non-enforcement of court decisions on tax invoices registration	6	Legislation drafts/amendments	11
VAT refund	5	Deficiencies in regulatory framework – state regulators	6
Tax termination/renewal/refusal of VAT taxpayer’s registration	1	Deficiencies in regulatory framework – other	3
		Deficiencies in regulatory framework tax	2
Actions of law enforcement bodies	30		
National Police – procedural abuses	5	State-owned companies	6
National Police – inaction	2	State-owned companies – abuse of authority	5
National Police – other	2	State-owned companies – other	1
National Police – criminal proceedings initiated	1		
National Police – corruption allegations	1	Actions of the Ministry of Justice	5
Prosecutor General’s Office – procedural abuses	4	Enforcement Service	4
Prosecutor General’s Office - inaction	4	State Registration Department	1
Prosecutor General’s Office – other	1		
Bureau of Economic Security (BEB)	8	Other issues	8
National Anti-Corruption Bureau (NABU)	1		
State Border Service of Ukraine	1	B2B complaints	3
Actions of state regulators	17	ARMA	2
Customs issues	16	Actions of courts	2
Customs clearance delay/refusal	8	Courts – delay in trial	1
Customs valuation	6	Courts – other	1
Customs other	2		

Complainants' portrait

Geography of complaints



Top-5 industries



Wholesale trade



Agriculture and mining



Private entrepreneur - FOP



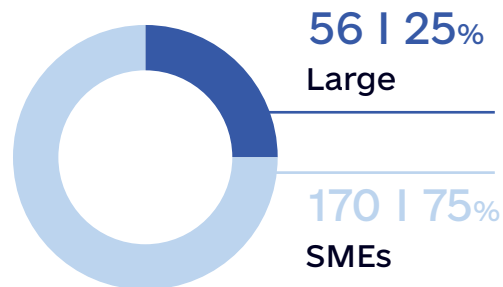
Production



Real estate and construction

Large

Business size



Origin of capital



Timelines of the preliminary review of complaints

The preliminary assessment of complaints took

10 working days.

Our standard duration: 10 days

If a complaint passes the preliminary assessment stage and meets the complaint criteria, then it moves to the investigation stage.

Investigation duration:

82 days.

Our standard: 90 days according to the Council's Rules of Procedure.

We investigated

73%

of all closed investigations within 90 days, in compliance with the BOC's Rules of Procedure.

Investigations



Complaints in preliminary assessment



Rejected complaints



Reasons for complaints dismissal

Subject of the complaint is outside Business Ombudsman's competence	67
The complaint is ungrounded or other bodies/institutions already consider such a case	7
The complainant did not provide sufficient cooperation	6
Complaints subject to any court or arbitral proceedings, or in respect of which a court, arbitral or similar type of decision was made	3
Other circumstances where the Business Ombudsman, in his sole discretion, determines that an investigation of the complaint is not necessary	2
A complaint filed to the Council again after a decision was made to leave it without consideration, except when the complainant provides really new circumstances, or facts or substantial evidence	1
A complaint filed by an individual who does not conduct business activities in Ukraine	1
The party affected by alleged malpractice has not exhausted at least one instance of an administrative appeal process available under the current legislation	1
A complaint relates to an issue that has already been addressed by the Business Ombudsman	1
The complaint was filed upon expiration of the limitation period specified in clause 6.2	1

Investigations: additional projects and initiatives

1. Long-term projects

A joint project with the STS on tax mediation

Backed by success of the first tax mediation case, the Council initiated five new mediation cases with the Large Taxpayers Office and regional departments of the State Tax Service of Ukraine in this area. Work is in progress.

A joint project with EU4PAR on implementation of the Law on the Administrative Procedure (LAP)

The Council studied the experience of communities in which a Complaint Review Commission operates under the city council: Vinnytsia, Myrhorod, Hrebinka, particularly as regards approaches to setting up the composition of the commission, its competence, and the procedure for reviewing complaints. In early April, the Council held an online meeting of Vinnytsia, Lviv, and Lutsk local governments to exchange practical experience.

De-shadowing project (home appliances and electronics market)

In the reporting quarter, the Council continued facilitating a dialogue between retail companies with the aim of concluding a Memorandum of Understanding. The team's main efforts were aimed at coordinating market participants' positions and establishing communication with government bodies interested in supporting this initiative.

Project Pulse

During the reporting quarter, the Council continued to provide support to the state in reviewing complaints submitted through the government Pulse system.



Understanding, evidently, the large number of complaints businesses file about the actions of public authorities, we were impressed by the prompt response of the Business Ombudsman Council. We would especially like to highlight the investigator's professional and measured approach, as well as her sincere desire to help us and to establish the truth. We can state that the Council's position, set out in its letter to the Head of the State Customs Service of Ukraine regarding our complaint, was articulated in a way we could not have even hoped for, significantly better than our own understanding and ability to present our position.

Simfoniya Tepla LLC

2. Advocacy work

Proposals for draft laws

The Council joined the discussion of draft amendments to the legislation on BEB initiative to create a criminally punishable tax offenses pre-trial settlement mechanism.

The Council provided the Ministry of Finance with proposals as regards:

- a draft law on the implementation of rules to combat tax evasion practices according to the Council Directive (EU) 2016/1164 of 12 July 2016 (ATAD).
- a draft law on improving transfer pricing rules to align them with the provisions of the Organization for Economic Cooperation and Development (OECD) Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations, 2022 edition, as well as the provisions of Steps 8–10 of the Base Erosion and Profit Shifting Action Plan (BEPS Action Plan) and the OECD Council Recommendations on Transfer Pricing between Associated Enterprises [OECD/LEGAL/0279].
- draft laws on introducing VAT for individual entrepreneurs (FOP) (the updated draft law took into account the Council's recommendation to increase the threshold for registration as VAT payers to UAH 4 mn).

Amicus curiae

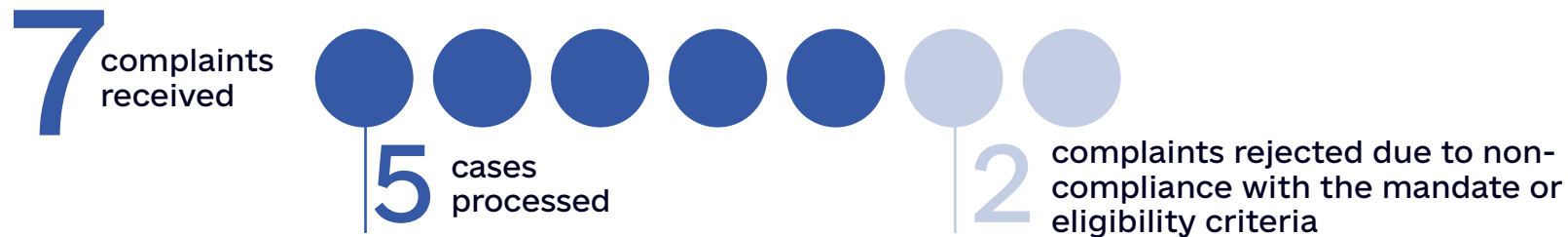
For the first time in its history, the Council submitted an amicus curiae opinion to the Supreme Court in terms of post-payment fiscalization, relying on the expertise obtained by the Council's investigators as part of complaints consideration on this issue.

Amicus curiae is one of the tools for advocating for changes in law enforcement by providing the court with the Council's legal positions as a third-party (independent) institution, which are not binding on the court, but may be taken into account during the decision-making.

Thank you very much for the fruitful cooperation in reviewing the complaint, preparing for and participating in the consideration of the complaint before the STS of Ukraine, and, as a result, for the cancellation of the tax assessments totaling UAH 53 million. Special thanks to the Senior Investigator for the direct support of our case during the appeal process.

Agricultural processing company

2. Helping business and the state in Ukraine's recovery processes



Key areas of complaints



Energy and Infrastructure:

A complaint regarding execution of court decisions and blocking of a heat generating facility, having implications for energy security and operations continuity.



Access to funding and grant programs:

Several complaints about grant funding mechanisms, including a case of denial of partial reimbursement of investments in livestock farming, as well as a case of an individual entrepreneur regarding blocking of co-financing within the framework of a grant program.



Regulatory environment and cost of doing business:

A complaint about introduction of a new levy to support aviation activities, which raised issues of regulatory predictability and financial burden on the industry.



Contract and payment issues in infrastructure services:

A complaint about delays in payment for consulting engineers, which may affect project implementation and private sector participation.

Interaction with government bodies in policy formation

On March 25, 2026, as part of the deregulation program implemented by the Ministry of Economy, Deputy Business Ombudsman Tetiana Korotka held a high-level meeting with leading national and international investors.

The meeting was focused on identifying urgent regulatory steps required to support the expansion of electricity generation capacity in Ukraine, with the aim of increasing generation to 3 GW by the end of the year.

Based on its results, a package of priority recommendations for the Cabinet of Ministers is being finalized with the participation of the BOC to accelerate decentralized energy generation development and improve the regulatory environment for private sector investments in the energy sector.

Updating the Memorandum with the Ministry of Communities and Territories Development

The Memorandum of Cooperation expands the framework of cooperation between the BOC and the Ministry of Communities and Territories Development towards systemic support for the private sector and joint mechanisms formation for its effective participation in the reconstruction processes.

Under the Memorandum, the Council will work with the Ministry on joint initiatives at the international, national and local levels.



Public speaking

Building Bridges Conference: UK–Poland–Ukraine Business Forum



Forum “Reconstruction in Action 4.0”



Business Day of the Confederation of Builders of Ukraine



We sincerely thank you and your team for the efforts and professionalism in your work, the result of which is support for and protection of the interests of business in governmental bodies. We are confident that the Business Ombudsman institution is undoubtedly an effective channel of communication between business and public institutions, in particular with supervisory authorities.

The responsible investigators organized the consideration of the case properly and used all possible means of communication to engage in dialogue with representatives of the State Tax Service of Ukraine.

PJSC “AB InBev Efes Ukraine”



3. Communication and cooperation with stakeholders

Stakeholder contacts

After her appointment, the Business Ombudsman Anka Feldhusen held a series of working meetings with key government bodies representatives to discuss further cooperation.



Prime Minister of Ukraine Yulia Svyrydenko



Office of the President of Ukraine



Ministry of Economy, Environment and Agriculture of Ukraine



Ministry of Finance of Ukraine



State Tax Service



Ministry of Health of Ukraine



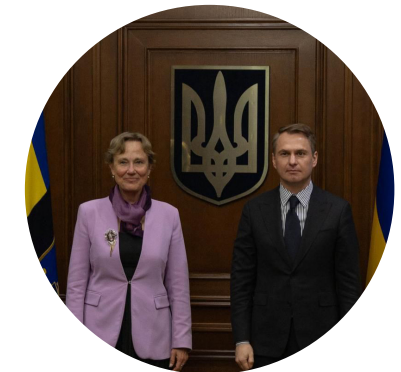
State Customs Service



Supreme Court of Ukraine



National Bank of Ukraine



Prosecutor General's Office

Also, during the first two months in office, Anka Feldhusen met with leading business associations and networks:



American Chamber of Commerce



The Ukrainian League of Industrialists and Entrepreneurs (ULIE)



European Business Association



Chamber of Commerce and Industry of Ukraine



Federation of Employers of Ukraine



Union of Ukrainian Entrepreneurs (SUP)



Ukrainian Network of Integrity and Compliance (UNIC)

Regional visits

Bila Tserkva

The Council's team met with city officials to discuss local businesses needs, and also visited businesses in the region.

The visit helped to better see how the community works with relocated businesses, industrial sites development, and attract investment.



Meeting with Bila Tserkva City Council



Visit to a food producer company



Visit to the Bila Tserkva Industrial Park



Visit to Biopharma enterprise

Zhytomyr

In Zhytomyr, the Council's team met with regional and city authorities representatives, and also joined the project "Dialogue Between Authorities and Business." The visit was focused on practical issues of supporting business in the region, the quality of dialogue between authorities and entrepreneurs, and working conditions of companies in the region.

Visits to local businesses complemented this understanding with industry and production context, important for the Council's further work with business complaints.



Joint meeting with Zhytomyr RMA and Zhytomyr City Council



Meeting with businesses of Zhytomyr region on the basis of the platform "Dialogue Between Government and Business"



Visit to Kromberg & Schubert Ukraine



Visit to Rud enterprise

Vinnytsia

During meetings with city authorities and the regional administration, the Council's team talked about staff shortage, access to financing and business support, and expanding the participation of women, youth, and silver-agers in the labor market.

As part of the visit, the Council also signed a Declaration of Fair and Reasonable Administration with Vinnytsia Regional Military Administration, by which the administration confirmed its readiness to adhere to the principles of transparency, predictability, and fairness in its interactions with business.

The team paid special attention to visits to enterprises, which allowed them to better understand the production context and business needs.

Also, during the visit to Vinnytsia, the Business Ombudsman spoke at the Ukrainian Women's Congress, where she presented the work of the Council and emphasized the importance of gender equality and support for women's businesses.



Meeting with Vinnytsia City Council



Signing Memorandum with Vinnytsia RMA



Speech at the Ukrainian Women's Congress



Complainant's visit to KNESS



Visit to Vinnytsia Food and Flavor Factory



We hereby express our profound respect for your review of the case materials, your recognition of the complaint as well-founded, your participation in preparing the materials for consideration jointly with the State Tax Service of Ukraine, and your legal support of the company's position in resolving disputes that arose as a result of documentary audits and the adoption of unlawful decisions.

Representative of the complainant

Visits to companies

Vyshhorod Solar Power Plant

During the visit, the Council's team got familiarized with the company's work in the renewable energy field. The subject of the company's appeal was repeated tax audits, within which the tax authority questioned the reality of business transactions and the constructed facility.



Ecosoft

The Council's team visited the company's production facilities and discussed challenges businesses face during the war with its representatives, particularly in interacting with state and local governments.



Events

In Q1 2026, the Council continued to actively participate in national and international events.

30
events

We do not only tell about the Council's activities, but also promote systemic changes at events.



Forum of EU4PFM jointly organised with Minfin and STS “Bridge to Europe: Ukraine’s European Integration Path in Taxation”



PWC Business Breakfast “Inspection results: Experience of 2025”



XV Corporate Lawyers Forum of Ukrainian Bar Association



EBA Global Outlook: Success in Adversity



Business Day of Confederation of Builders of Ukraine



Investment Protection in Ukraine: Practical Mechanisms and Institutional Support (Norwegian Chamber of Commerce event)



Ukrainian Women's Congress



Committee of VRU on Economic Development

Media

Social networks

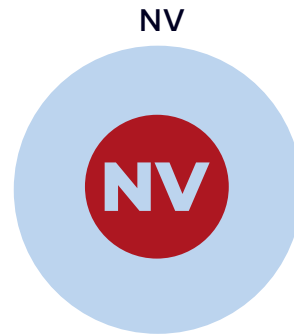
f 9 835
followers
345 191
views
8 428
interactions

in 1 707
followers
12 510
views
649
interactions

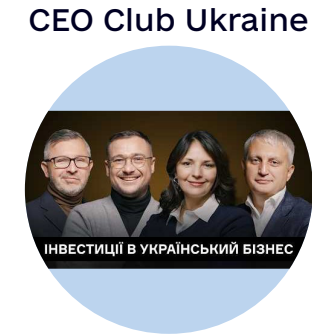
Website

14 000
active users
29 000
views

Interview



YouTube



Mentions

Mind.ua



Delo.ua



Debit-Credit



Bukhhalter 911



Minfin



AgroPortal



UA.NEWS



The Pharma
Media



Sudovo-
Yurydychna Gazeta





Business
Ombudsman
Council

Eliminating barriers to doing business in Ukraine

www.boi.org.ua