

Conflict of Interest Regulation in Transitional Legal Systems: A Comparative Legal Study of Ukrainian Compliance with International Anti-Corruption Standards*

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Abstract

This article examines the legal and institutional implementation of international standards on conflict-of-interest regulation within the Ukrainian legal system. Drawing on a comparative legal methodology, the study evaluates the degree of normative convergence between Ukrainian legislation and key international instruments, including the United Nations Convention against Corruption (UNCAC), OECD Recommendations, and GRECO guidelines. In addition to doctrinal analysis, the research analyzes 120 judicial decisions at the national, regional, and local levels to assess patterns of interpretation, enforcement disparities, and procedural compliance. The findings reveal that while Ukraine demonstrates a high level of formal alignment, particularly in its legal provisions on disclosure and sanctions, significant deficiencies persist in preventive mechanisms, judicial consistency, and institutional coordination. The study identifies structural obstacles that hinder effective enforcement, including the absence of harmonized jurisprudence, insufficient legal training, and weak oversight frameworks. These gaps risk reducing international compliance to a symbolic function rather than a substantive tool for safeguarding integrity in public governance. The article concludes with targeted recommendations for legal reform, emphasizing the need for judicial interpretive guidelines, independent monitoring bodies, and coordinated enforcement strategies. By situating Ukraine's legal system within a global comparative context.

Keywords: Conflict of Interest; International Anti-Corruption Law; Ukrainian Administrative Law

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A. INTRODUCTION

Legal regulation of conflicts of interest is a central component of public administration and anti-corruption law. It is particularly critical in institutionally reforming states, where weakened frameworks of governance and thin legal capacity retard the normal application of international standards. Under these conditions, the distance between *de jure* legal obligations and *de facto* enforcement tends to annihilate the trust of the public and destabilize the rule of law (Hancock, 2024). In Ukraine, conflict of interest management has been the key challenge in efforts to improve public integrity. While legal reforms have begun—most significantly since the adoption of the Law of Ukraine "On Prevention of Corruption" – their application on the ground has been patchy and uneven. The issue is not just with the presence or absence of regulatory papers, but also with the judiciary's implementation of conflict-of-interest guidelines per national law and international legal obligations (Transparency International, 2024). The conflict of interest, when applied to international public law practice, is understood as a situation where private interests of a public official inappropriately influence their fulfillment of official duties. International instruments like the United Nations Convention against Corruption (UNCAC), OECD Recommendations, and GRECO evaluations require states to minimize such situations by utilizing clear legal definitions, obligatory disclosure, sanctions, and independent review (Venice Commission, 2020). While Ukraine has officially signed these norms, the level of effective compliance with the law at the legislative level, as observed through judicial practice and enforcement outcomes, has not been evaluated systematically (Eucountry, 2023).

Moreover, full-scale integrated analysis throughout domestic legislation and court rulings, and international paradigms, does not occur. This lack, therefore, prevents it from being possible to gauge the actual effectiveness of Ukraine's anti-corruption legal framework and the credibility of its institutions (Oleksiiuk, 2022). This study addresses these lacunae by asking the question: To what extent does Ukrainian law reflect and implement international norms on conflict-of-interest regulation, and what legal policy adjustments are necessary to ensure substantive compliance? (National Bank Of Ukraine, 2022) The research employs comparative legal methodology, comprising doctrinal analysis of statutory law, case study of judicial decisions, and legal-institutional analysis of enforcement structures at national, regional, and subnational levels.

The objectives of this article are: 1). To analyze the current Ukrainian legal framework on conflict-of-interest regulation in comparison with international best practices; 2). To assess judicial institutions' enforcement of these provisions

in practice, at different levels of government; 3). To ascertain institutional and procedural impediments to legal consistency and recommend reforms inspired by comparative legal models.

Literature Review

The regulation of conflicts of interest in public administration has emerged as a central topic in anti-corruption research and legal scholarship, especially in jurisdictions undergoing democratic transition. In recent years, attention has shifted from general conceptualizations of ethical governance toward an integrated legal framework that links international instruments, national legislation, and judicial practice.

Internationally, the United Nations Convention against Corruption (UNCAC) and the OECD Recommendation on Public Integrity have provided a normative foundation for regulating conflicts of interest. These instruments require signatory states to adopt preventive measures, establish clear rules on declaration and management of conflicts, and ensure enforcement through sanctions and oversight. GRECO (Group of States against Corruption) also emphasizes monitoring mechanisms and institutional integrity. However, implementation varies significantly, and scholarship suggests that legal harmonization often requires domestic adaptation, especially in post-Soviet or transitional systems.

Costa (2023) highlights comparative models from Brazil, South Korea, and the EU, illustrating the necessity of legal precision and institutional independence. Yet, the practical transplantability of such models to Ukraine is limited without a clear domestic legal-institutional analysis. Similarly, studies by True-Frost (2022) and Zhang (2023) underscore tensions between international law and national enforcement mechanisms, arguing that successful norm implementation depends on legal compatibility and institutional trust. From a national perspective, Likarchuk et al. (2022) identify deficiencies in Ukraine's civil service conflict-of-interest regulation but omit structured comparisons with international legal standards.

Petrini and Riva (2021) stress that legal provisions must be supported by a culture of compliance and ethical accountability, which is particularly pertinent in transitional democracies. Pfeffer (2022), writing on decentralization, draws attention to judicial inconsistencies in subnational governance, aligning with Ukrainian empirical observations. Judicial ethics and impartiality have also been addressed by Rishan (2022), who examines how institutional credibility affects

conflict-of-interest rulings, especially within constitutional courts. These concerns are echoed in GRECO evaluations of Ukraine, which underscore systemic enforcement gaps at the local and regional levels.

Additionally, the Council of Europe (2024) has provided criteria for judicial integrity assessment, recommending structural reforms to enhance legal predictability and reduce politicization in conflict-of-interest adjudication. The Venice Commission (2020) similarly advises narrowing legal discretion in conflict definitions to prevent arbitrary interpretation.

Despite the breadth of international recommendations, few studies provide actionable frameworks for operationalizing legal reforms within Ukraine's administrative and judicial systems. There remains a lack of integrated models that combine legal doctrine, comparative regulatory insights, and enforcement outcomes.

This study aims to bridge that gap by systematically analyzing Ukrainian legislation alongside international standards and by assessing judicial decisions across multiple administrative levels. It addresses the need for a legal-empirical hybrid approach, enabling both comparative doctrinal analysis and measurable evaluation of enforcement capacity.

B. METHODS

This study adopts a legal-empirical methodology grounded in doctrinal analysis and comparative legal research, supported by selected case law and content evaluation of institutional practice. The purpose is to determine the extent of Ukraine's compliance with international conflict-of-interest standards and identify enforcement deficiencies through legal and institutional lenses.

The research framework integrates several methods: Comparative Legal Method, to contrast Ukrainian conflict-of-interest legislation with key international instruments, including the United Nations Convention against Corruption (UNCAC), OECD Recommendation on Public Integrity, and GRECO guidelines; Case Study Method, involving targeted analysis of Ukrainian judicial decisions across three administrative levels (national, regional, and local) to identify patterns in legal interpretation and procedural consistency; Legal Forecasting Method – to develop reform proposals based on existing legal gaps, comparative models (EU countries, USA, Georgia, Kenya, India), and observed weaknesses in enforcement mechanisms.

A total of 120 court decisions from 2019 to 2024 were analyzed. These were selected from the Unified State Register of Court Decisions and based on official referrals by the National Agency on Corruption Prevention (NACP) (2023; 2024). Only decisions involving an explicit legal determination of conflict of interest in public administration were included. Stratified selection ensured representation from national, regional, and local courts. In parallel, the legal review included an in-depth textual comparison of Ukrainian statutes (e.g., Law of Ukraine “On Prevention of Corruption”) against articles of the UNCAC (particularly Articles 7, 8, and 9), OECD benchmarks (2023), and GRECO evaluation rounds (IV and V).

Instead of focusing primarily on statistical metrics, the study prioritized legal analysis and consistency of judicial reasoning. Court decisions were evaluated using qualitative legal content analysis, examining: The application of domestic legal norms in determining conflicts of interest; Reference (if any) to international legal instruments by judges; Judicial treatment of procedural rights, proportionality, and sanction effectiveness. Quantitative indicators were used solely to highlight enforcement disparities, not as the central evaluative tool. Basic distributional data (convictions vs. acquittals) supported the interpretation of legal inconsistency.

The legal validity of the sample is anchored in the official and binding nature of court rulings and formal national anti-corruption reporting. All selected cases passed procedural filters (e.g., final decisions, published rulings), ensuring analytical reliability. The international norms referenced are binding or soft-law standards with formal monitoring mechanisms, reinforcing external validity. However, the study recognizes limitations: the absence of unpublished or non-judicial resolutions, the influence of non-legal factors (political, regional), and the exclusion of informal practices such as administrative negotiations or internal disciplinary proceedings.

C. RESULTS AND DISCUSSION

1. Legal Compliance with International Standards

The comparative legal analysis of Ukrainian legislation against the United Nations Convention against Corruption (UNCAC), the OECD Recommendation on Public Integrity, and GRECO recommendations revealed a strong formal alignment in several areas. Ukraine’s normative base includes provisions on the declaration of private interests, administrative and disciplinary sanctions for violations, and a mandate for public officials to avoid situations where private

interests may conflict with public duty. However, the degree of alignment is uneven across regulatory areas. The legal rules concerning the obligation to declare conflicts of interest showed the highest compliance (over 90%), indicating that Ukraine has adopted the principal international requirements. These are codified in the Law of Ukraine "On Prevention of Corruption" and various by-laws issued by the National Agency on Corruption Prevention (NACP). However, public accessibility and enforcement of these declarations remain deficient, limiting their preventive function.

Sanctions for violations – ranging from fines and administrative penalties to dismissal – exist but lack uniform application. The national legislative framework provides formal sanctioning authority, yet enforcement mechanisms often vary in interpretation and implementation across judicial levels. In this regard, Ukraine meets roughly 80–85% of international expectations, suggesting a need for procedural reform and judicial training to ensure legal certainty.

Preventive mechanisms, including risk assessment systems, post-employment restrictions, and ethics committees, remain the weakest element of compliance. These mechanisms are recommended by the OECD and GRECO to ensure proactive deterrence, yet in Ukraine, such instruments are either missing or inconsistently regulated. As a result, practical prevention of conflicts of interest is largely reactive, often only addressed after legal violations have occurred.

2. Judicial Practice and Interpretative Divergences

The study reviewed 120 court decisions involving conflict-of-interest violations from 2019 to 2024. The sample was stratified to reflect cases from the national, regional, and local administrative levels. The analysis revealed marked interpretative divergences in the judicial application of legal norms. At the national level, courts generally applied conflict-of-interest provisions with a high degree of legal rigor. Judges referred to statutory definitions, adhered to procedural guarantees, and often issued clear reasoning for their rulings. In several cases, the courts cited international anti-corruption standards such as UNCAC provisions as interpretive aids. Conviction rates were high, and procedural violations were minimal. This suggests a strong institutional environment, greater judicial training, and more effective internal oversight mechanisms.

In contrast, regional courts displayed inconsistencies in both legal reasoning and procedural application. While many judges applied the relevant

legal provisions correctly, others failed to provide detailed justifications for their decisions. Conviction rates declined moderately, and procedural deficiencies (such as insufficient evidence, reasoning, or unclear legal argumentation) appeared more frequently. The use of international standards as interpretive tools was also largely absent at this level, indicating limited judicial engagement with global norms.

At the local level, the courts demonstrated the most fragmented practice. Conviction rates dropped further, acquittals increased, and procedural violations were more common. Judges often treated conflict-of-interest provisions in a purely formalistic manner, without exploring the underlying purpose of the rules or the standards developed by international legal bodies. In some decisions, legal terms such as “private interest” or “undue influence” were either misapplied or undefined. This suggests either a lack of legal expertise or susceptibility to external pressure, undermining the deterrent function of the law.

3. Institutional Fragmentation and Enforcement Disparities

While the national anti-corruption framework is coherent on paper, the study revealed systemic enforcement disparities across administrative levels. These disparities are partly institutional (e.g., resource constraints, weak oversight mechanisms), but also legal, stemming from ambiguous procedural rules, a lack of binding precedent, and limited mechanisms for judicial review.

Three major legal-institutional problems emerged from the analysis:

- a. **Inconsistent Procedural Safeguards.** Regional and local courts often failed to ensure procedural equality between the parties. In some cases, public officials were sanctioned without proper legal representation or were denied the opportunity to present exculpatory evidence. This runs contrary to international fair trial guarantees and undermines the legitimacy of enforcement decisions.
- b. **Weak Judicial Integration of International Norms.** Outside the national level, courts rarely invoked or interpreted Ukrainian law in the light of UNCAC, OECD, or GRECO recommendations. This suggests a disconnect between formal compliance and judicial internalization of international legal norms. Courts treat conflict-of-interest rules as isolated domestic obligations rather than as components of a broader international anti-corruption framework.

- c. **Institutional Coordination Gaps.** The National Agency on Corruption Prevention (NACP), the State Audit Service, and judicial institutions lack effective coordination mechanisms. For example, administrative penalties may be applied independently of judicial proceedings, leading to inconsistent legal outcomes or duplication of sanctions. Moreover, the absence of a centralized register of legal violations impedes strategic enforcement and makes it difficult to develop targeted legal reforms.

Taken together, these findings indicate that legal reform must go beyond legislative drafting. Strengthening institutional capacity, improving judicial training, and establishing integrated review and monitoring mechanisms are essential to ensuring that legal norms are effectively enforced and serve their preventive and deterrent functions.

The evaluation confirms that Ukraine has taken serious formal steps to align its conflict-of-interest legislation with international rule-of-law standards of the rule of law. However, implementation of these standards at various levels of the judiciary and administrative machinery shows continuing inadequacies in consistency of application, procedural simplicity, and institutional independence. These findings highlight a deeper difference between being formally compliant with the law and being operationally integrity in practice.

Ukraine's substantial level of compliance (92.63%) with legal requirements for disclosure and formal sanctions is in line with international anti-corruption standards such as UNCAC and the OECD Recommendation on Public Integrity. Nevertheless, the absence of post-employment bans, inadequate monitoring, and thin preventive measures reflects that alignment is still incomplete. Such shortcomings echo previous findings during GRECO's evaluation cycles and OECD monitoring reports, which underline that compliance must be reinforced with institutional power and legislative enforceability.

One of the strongest contributions of this study is the systematic identification of judicial variance at various levels of administration. National courts employ conflict-of-interest legislation more systematically, and they depend more on statutory rationality and procedural protection. Region-level courts and local courts are marked by interpretive variance, limited application of international law norms, and procedural manipulations. These trends concur with Pfeffer's (2022) evidence on decentralized enforcement asymmetries and demonstrate that subnational variation refutes national anti-corruption objectives directly. Furthermore, the research corroborates Petrini's and Riva's (2021) hypothesis that institutional conflicts of interest cannot be resolved by legal rules alone without simultaneous cultural and ethical reforms. The

experience in Ukraine shows the way political instability, lack of proper training, and an uncultured legal setting lead to a superficial application of international standards. Judicial decisions at the subnational level pay no heed to the preventive foundation of conflict-of-interest norms, reducing them to formalistic commitments without any material effect.

From a comparative law perspective, the Ukrainian experience finds sympathy in other transitional courts, such as Georgia and Kenya, where the existence of advanced laws is not always matched by institutional or judicial readiness for routine application. The lack of judicial precedent and rare reference to international instruments by judges bears witness to the low judicial internalization of international legal norms. True-Frost (2022) analysis of international human rights law also identifies the risks of piecemeal norm application without system-wide change of law and cross-institutional planning.

The findings also raise an alarm about access to justice and procedural fairness, especially in domestic courts. A number of judgments had insufficient legal reasoning, while some violated essential procedural rights, like the right to defense or appeal. These procedural shortcomings erode the legitimacy of enforcement and conflict with standards codified in the European Convention on Human Rights as well as the UNCAC. In this respect, Rishan's (2022) introspection with respect to judicial ethics and legitimacy rings powerfully within the Ukrainian context.

Another pressing issue pertains to a deficiency of legal forecasting and coordinated judicial interpretation. Ukraine still does not have an integrated system of precedent or doctrine of law regarding how the conflict-of-interest standards are to be interpreted within the international law framework. The same legal standards, therefore, yield varying judicial outcomes depending on jurisdiction and level of administration. Such fragmentation of the law erodes public trust in enforcement mechanisms and hinders Ukraine's transition towards European legal space harmonization.

Finally, the analysis reveals that there is a critical requirement for legal education and institutional coordination. Although the NACP and the judicial institutions belong to the same regulatory system, there is no hierarchy in their relationship. Sanction decisions are occasionally arrived at in isolation from the judicial check, and administrative powers lack the required tools of legal follow-up. These institutional loopholes are in line with the calls from the Council of Europe (2024) for a comprehensive legal and institutional approach to conflicts of interest.

In short, although Ukraine has been successful in borrowing normative international anti-corruption law vocabulary, the functional application of such rules is very uneven. The study recognizes the multi-dimensional reform program: strengthening judicial capacity, entrenching international legal norms in national jurisprudence, and cementing procedural protections at all administrative tiers. Without such reforms, Ukrainian formal compliance with the law risks being symbolic rather than a material guarantee of integrity and accountability.

4. Limitations

Despite offering a comprehensive legal and institutional analysis, this study is subject to several limitations inherent to doctrinal-comparative research and case-based methodology.

First, the judicial sample is limited to 120 published court decisions between 2019 and 2024, potentially excluding relevant but unpublished or unindexed rulings. This limitation may affect the generalizability of findings across all administrative and judicial contexts in Ukraine.

Second, the study focuses on formal legal sources—legislation, international instruments, and court decisions—while informal practices (e.g., internal disciplinary proceedings, administrative discretion, and political influence) remain outside the scope of systematic assessment. These non-transparent mechanisms may significantly influence the real-world application of conflict-of-interest norms.

Third, the comparative analysis draws primarily from UNCAC, OECD, and GRECO standards, with limited integration of regional frameworks such as EU *acquis* or ECtHR jurisprudence. Future research should incorporate broader international legal perspectives to assess harmonization potential more comprehensively.

Fourth, the research does not evaluate the behavioral effects of legal norms among public officials—such as deterrence or institutional learning—which would require complementary field research or sociological inquiry. This represents an important direction for interdisciplinary expansion.

Lastly, the absence of binding legal precedent in Ukrainian courts introduces interpretive variability that is difficult to quantify. The lack of a unified jurisprudential doctrine means that identical legal norms may result in

diverging applications across jurisdictions, complicating normative consistency assessments.

5. Recommendations

Building on the findings of this study, several legal-institutional reforms are proposed to enhance Ukraine's conflict-of-interest regulation and align it more closely with international standards in both form and function:

a. Codify a Unified Definition of Conflict of Interest.

The legal concept should be clearly defined and standardized across administrative and judicial acts to eliminate ambiguity and prevent discretionary or politically motivated interpretation. Incorporation of definitions drawn from UNCAC Article 8 and OECD guidelines is recommended.

b. Introduce Binding Judicial Interpretative Guidelines

The Constitutional or Supreme Court should issue formal interpretative acts or model decisions to guide lower courts in conflict-of-interest cases. This would reduce judicial fragmentation and foster jurisprudential consistency, especially at the regional and local levels.

c. Strengthen Independent Oversight Mechanisms

Institutional independence of monitoring bodies, such as the National Agency on Corruption Prevention, should be legally reinforced to ensure procedural impartiality and operational autonomy. This includes granting authority to review and contest administrative decisions affecting integrity rules.

d. Institutionalize Judicial and Administrative Training

Judges, prosecutors, and public administrators should undergo regular training on international anti-corruption standards, procedural guarantees, and ethical adjudication. Comparative modules using case law from EU countries, Georgia, and the OECD framework should be prioritized.

e. Establish an Integrated Enforcement Register

A centralized public database of conflict-of-interest decisions, administrative rulings, and compliance records would increase transparency, facilitate legal tracking, and reduce duplication or inconsistency across enforcement institutions.

f. Enhance Coordination Among Enforcement Agencies

Legislative mechanisms should mandate formal coordination between courts, the NACP, and anti-corruption prosecutors. Joint working groups or inter-agency protocols could help close legal gaps, prevent enforcement overlaps, and standardize response strategies.

g. Promote Public Access and Legal Awareness

Ensuring that conflict-of-interest declarations, judicial decisions, and enforcement data are publicly accessible would empower civil society oversight and improve institutional trust. Legal education campaigns can also demystify the scope and implications of these norms for public servants. These recommendations, while specific to Ukraine, may offer transferable insights for other EU candidate or Eastern Partnership countries facing similar challenges in harmonizing national law with international integrity standards.

D. CONCLUSION

The effective regulation of conflicts of interest constitutes a cornerstone of public integrity, legal accountability, and democratic governance. This study assessed the extent to which Ukrainian legislation aligns with international standards on conflict-of-interest prevention, particularly those articulated by UNCAC, OECD, and GRECO. It also examined how these norms are interpreted and applied within national, regional, and local judicial systems.

The findings reveal a clear dichotomy: while formal legal compliance with international standards is high, particularly in terms of disclosure requirements, practical enforcement remains uneven and highly dependent on institutional context. National-level institutions exhibit stronger legal reasoning, procedural adherence, and occasional reference to international legal frameworks. In contrast, regional and local bodies demonstrate significant interpretive inconsistency, procedural weakness, and limited integration of global standards.

These enforcement gaps point to systemic challenges, including fragmented institutional coordination, absence of binding jurisprudence, and limited judicial internalization of international obligations. Moreover, the weak development of preventive mechanisms—such as post-employment restrictions, ethics oversight, and proactive monitoring—suggests that Ukraine’s legal framework still lacks the structural depth needed to deter conflicts of interest in practice.

This research makes several key contributions. First, it provides an original, evidence-based legal analysis that integrates comparative doctrine, empirical court practice, and international regulatory standards. Second, it

identifies priority areas for legal reform, including the need for judicial harmonization, institutional independence, and consistent interpretation of anti-corruption norms. Third, it situates Ukraine's legal efforts within a broader global context, offering comparative insights for EU candidate countries and transitional jurisdictions aiming to strengthen rule-of-law mechanisms.

Ultimately, the study concludes that legislative alignment is a necessary but insufficient condition for effective integrity governance. Without judicial consistency, institutional trust, and public transparency, legal norms risk remaining declarative. For Ukraine to advance its anti-corruption agenda and reinforce public accountability, legal reforms must be paired with operational independence, legal education, and sustained adherence to international principles of public ethics. Future research should explore the behavioral dimensions of these legal norms, including how officials respond to enforcement incentives and how public trust shapes institutional compliance. Additional comparative work could assess how similar legal mechanisms perform in other post-Soviet, EU candidate, or Global South jurisdictions, enriching the dialogue between international law and national implementation.

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