

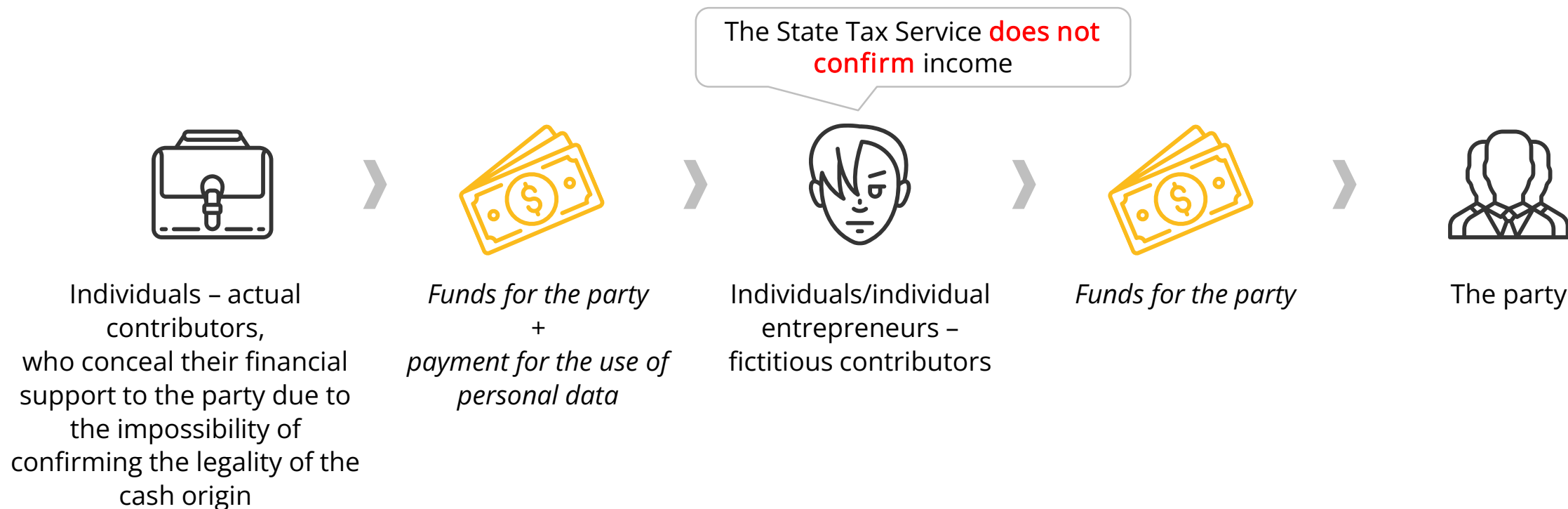


НАЦІОНАЛЬНЕ АГЕНТСТВО  
З ПИТАНЬ ЗАПОБІГАННЯ КОРУПЦІЇ

NATIONAL AGENCY  
ON CORRUPTION PREVENTION

# How to increase the integrity of political parties: 10 tips from the NACP

# SITUATION 1: Refuse contributions from fictitious donors



## Typical signs:

- individual contributors are too young or elderly;
- making contributions in equal amounts by several persons on the same day from the same bank branch;
- sequence of bank document numbers of the contributors.

## Consequences:

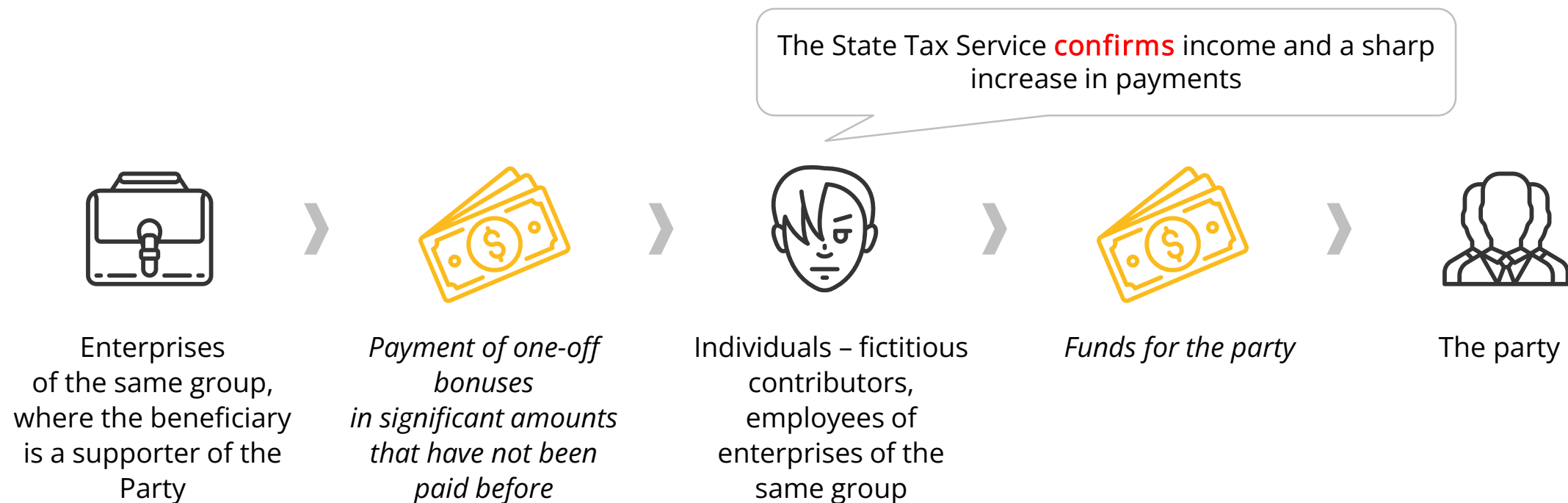
### For the party:

- reputational losses

### For the contributors:

- criminal liability

## SITUATION 1.1.



### Typical signs:

- contributors are employees of the same group of companies;
- a sharp increase in payments from the employer;
- contributions in equal amounts by several persons on the same day from the same bank branch;
- sequence of bank document numbers of the contributors.

### Consequences:

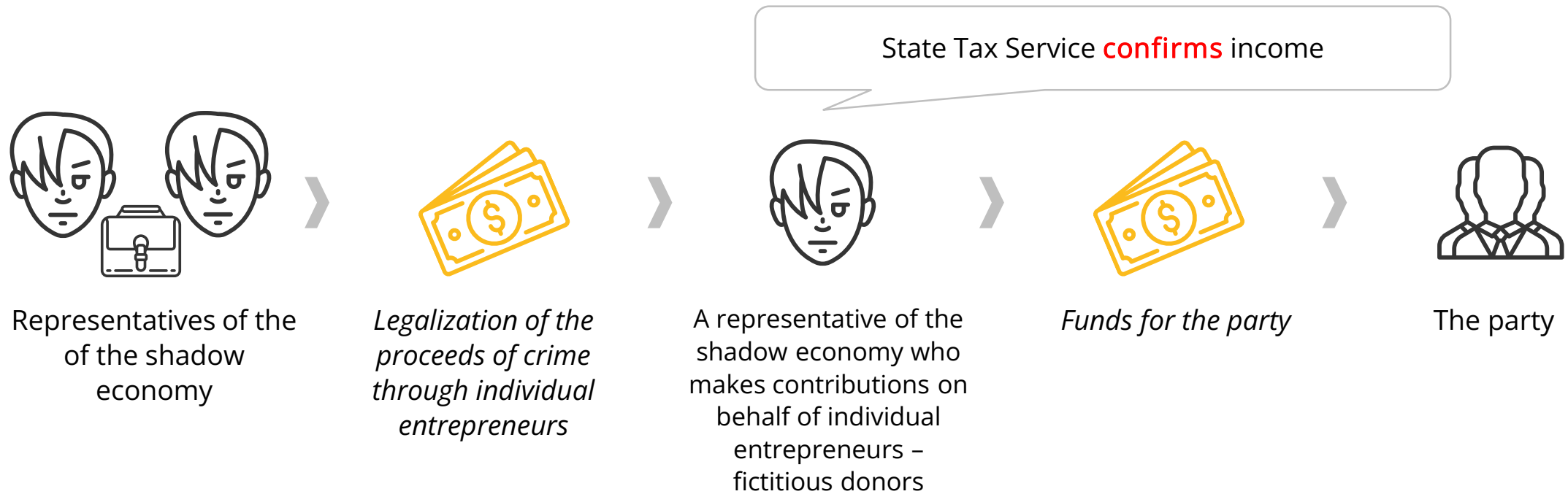
#### For the party:

- reputational losses

#### For the contributors:

- criminal liability

## SITUATION 1.2.



### Typical signs:

- contributors have common (dubious) sources of income;
- a sharp increase in the income of the contributors in the year of making contributions;
- making contributions in equal amounts by several persons on the same day from the same bank branch;
- sequence of bank document numbers of the contributors.

### Consequences:

#### For the party:

- reputational losses

#### For the contributors:

- criminal liability

## SITUATION 2. Report receipt of contributions in the form of public events organized by third parties



### Typical signs:

- availability of information from external sources about the Party's promotion activities.

### Consequences:

#### Regarding the party:

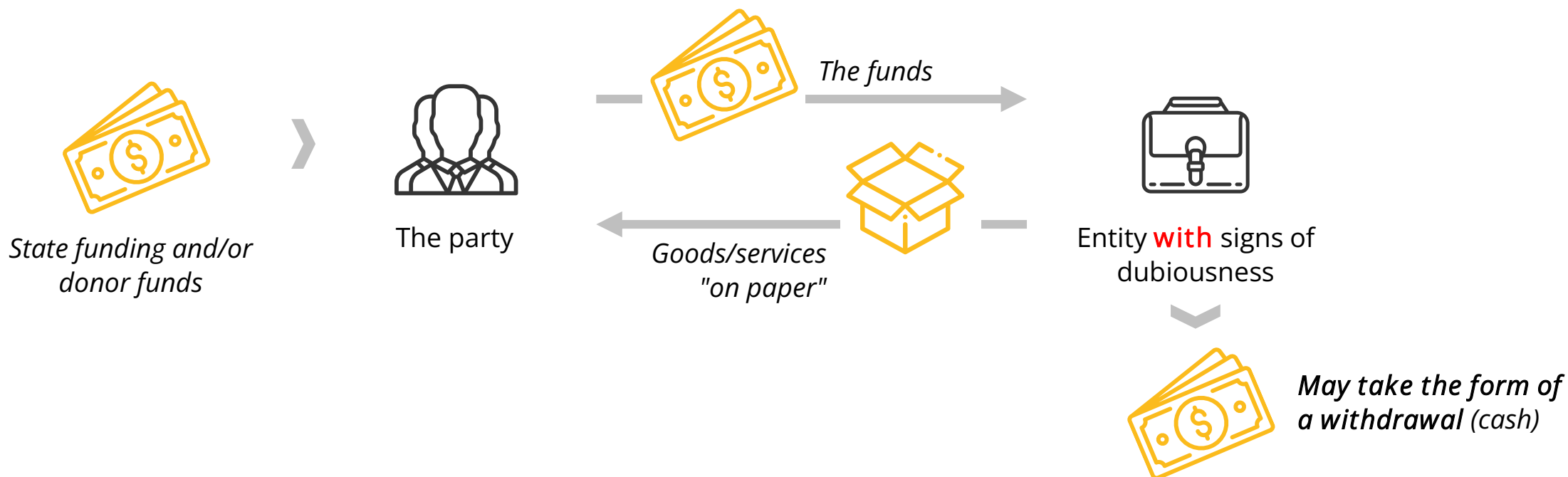
In case of incomplete information provided:

- administrative liability.

In case of inaccuracy of the information provided:

- suspension of funding;
- criminal liability.

## SITUATION 3. Avoid dealing with entities that have signs of dubiousness



### Typical signs of dubious transactions:

- the entity was established (resold) on the eve of the withdrawal of funds and has not previously carried out activities in this area;
- the official (signatory) is/was a founder or an official of other entities involved in criminal proceedings;
- the official is employed 8/24 (full-time) at another enterprise (state/municipal), where he/she receives official income (accrued (paid) salary);
- the entity's current accounts were opened on the eve of the transfer of funds.

### Consequences of dubious transactions:

#### For the party:

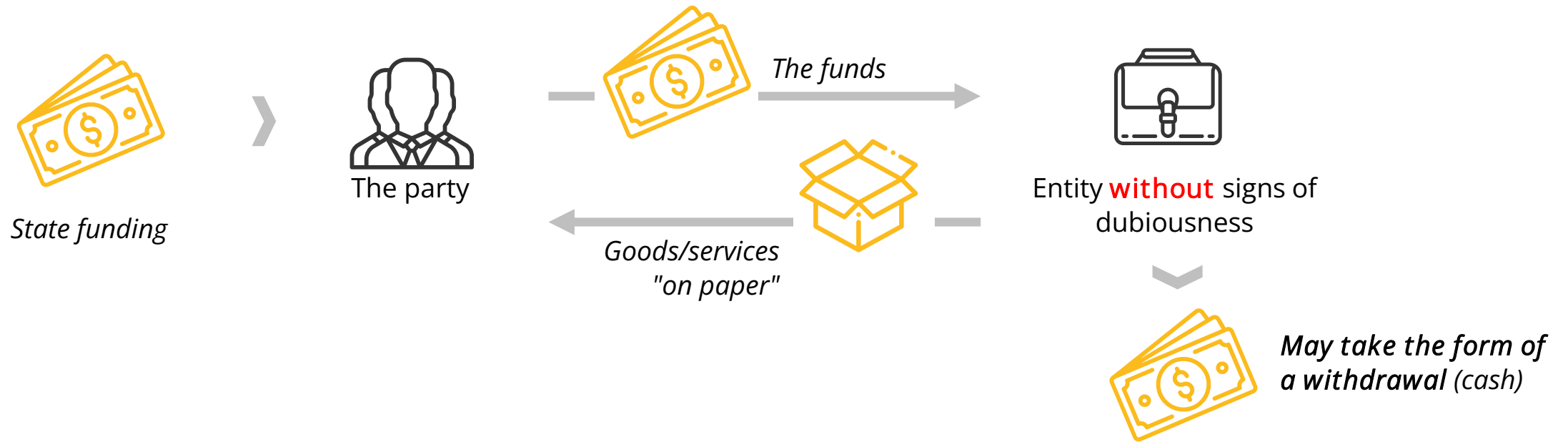
In case of incomplete information provided:

- administrative liability.

In case of inaccuracy of the information provided:

- suspension of funding;
- criminal liability.

## SITUATION 4. Operations should be real, not "on paper"



### Typical signs of dubious transactions:

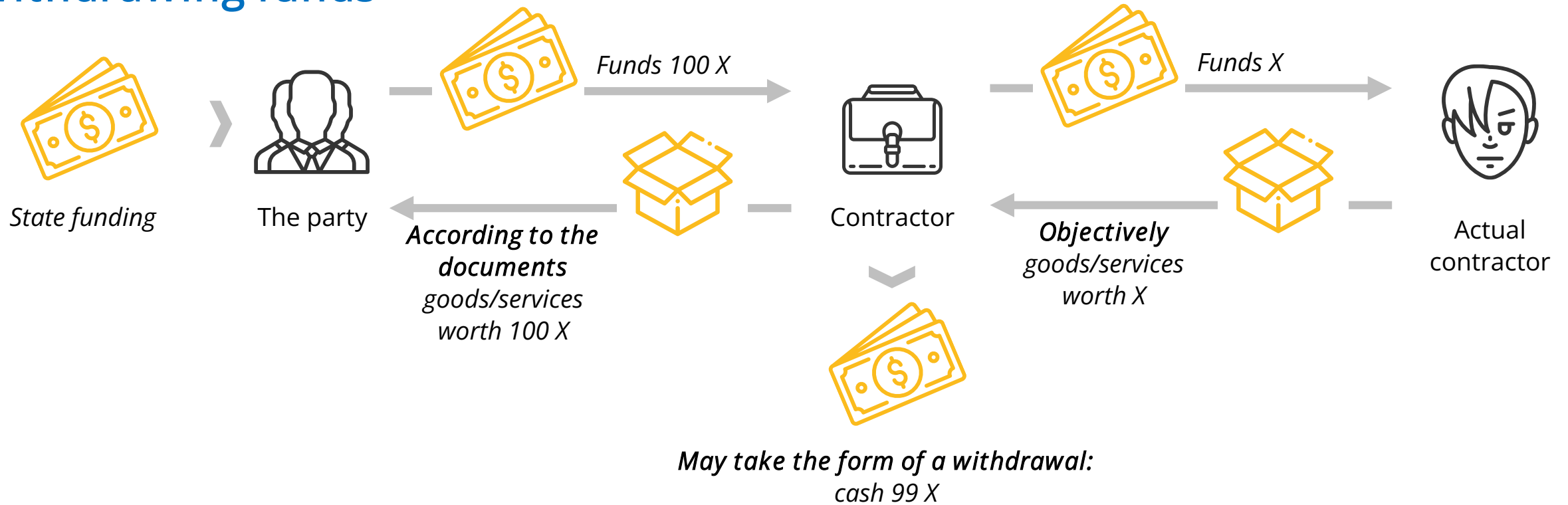
- the entity's settlement accounts were opened before the transfer of funds;
- contracts are signed before the date of appointment of officials and/or before the opening of settlement accounts;
- the delivery of goods is not accompanied by a proper package of documents;
- documentation for "received goods" has inconsistencies and defects in execution.

### Consequences of dubious transactions:

#### For the party:

- suspension of funding;
- criminal liability is provided for.

## SITUATION 5. Avoid overpricing services (goods) for the purpose of withdrawing funds



### Typical signs:

- provision of services and goods at prices higher than the average market price (determined by analysing information resources and documents of the actual contractors);
- the subject matter of the transactions is vague;
- the cost (price) of certain services is missing and/or the number of services and the reasoning for their cost are missing.

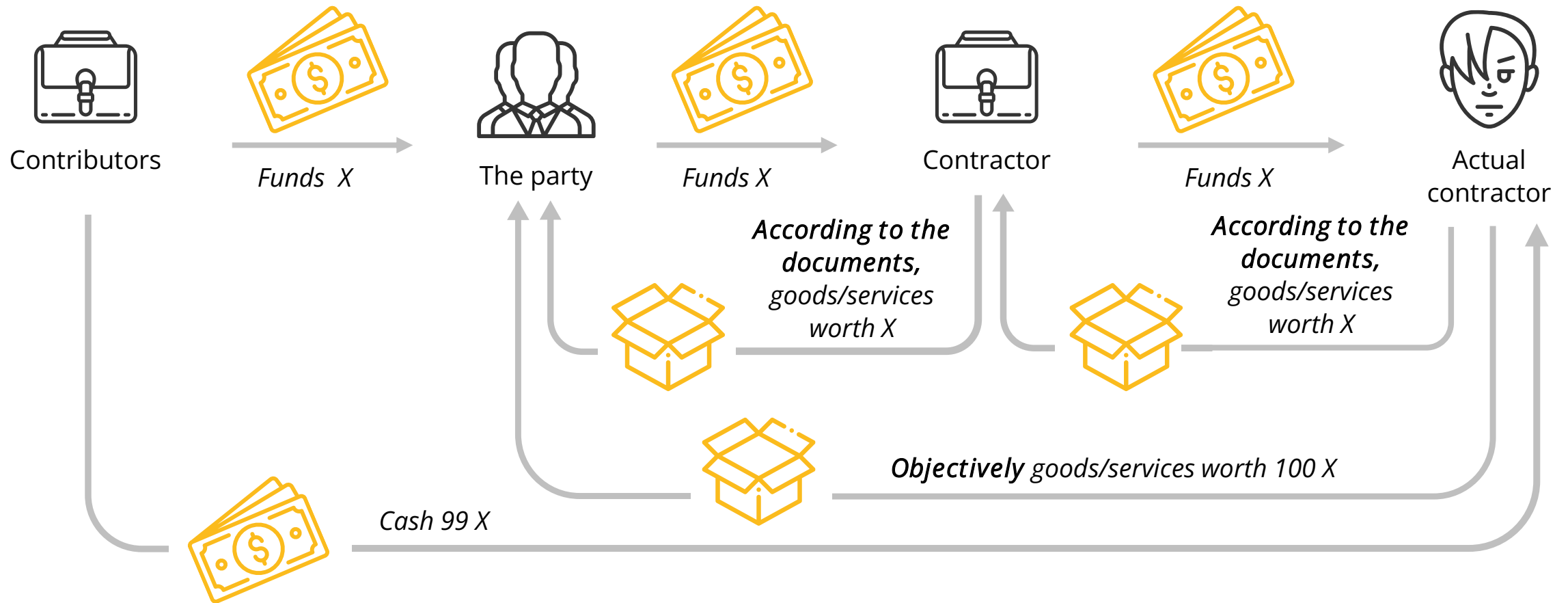
### Consequences:

#### For the party:

- criminal liability  
(without inaccurate information, overstatement of the price is not a ground for suspension of financing).



## SITUATION 6. Report the actual amount of contributions/expenditures



### Typical signs:

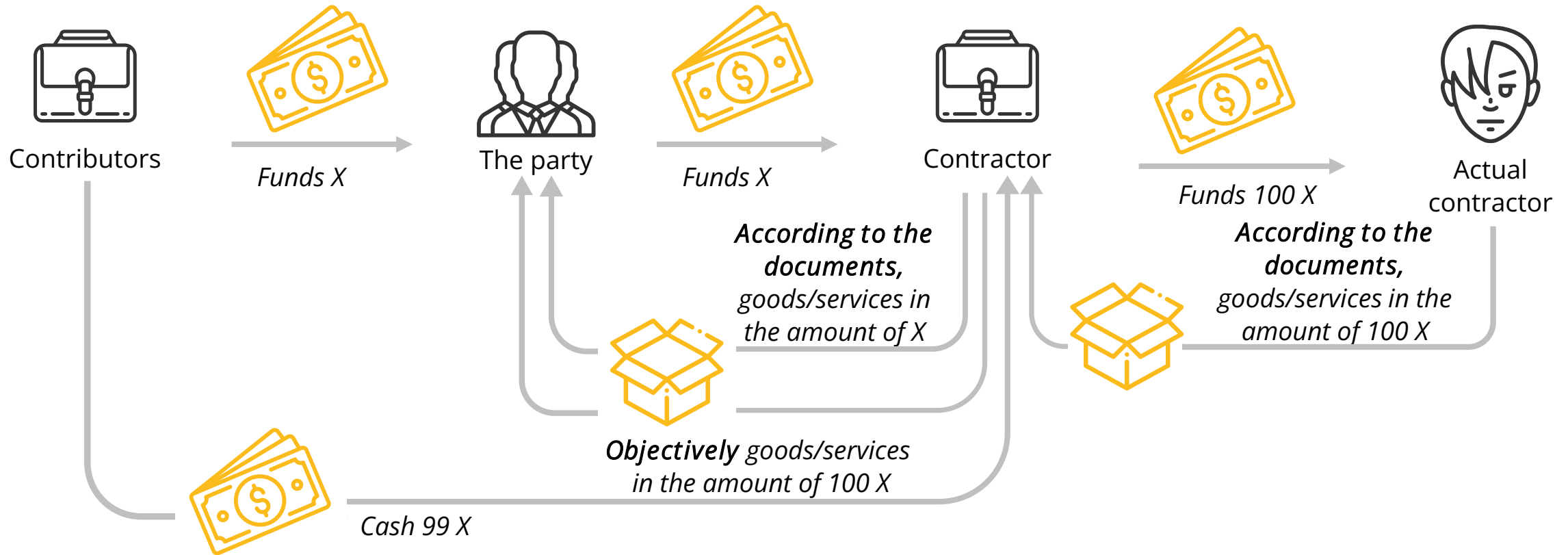
- provision of services and goods at prices significantly lower than the market average (determined by analysing information resources and documents of actual contractors).

### Consequences:

#### For the party:

- suspension of funding;
- criminal liability is provided for.

## SITUATION 7. Report the actual quantity of goods/services



### Typical signs:

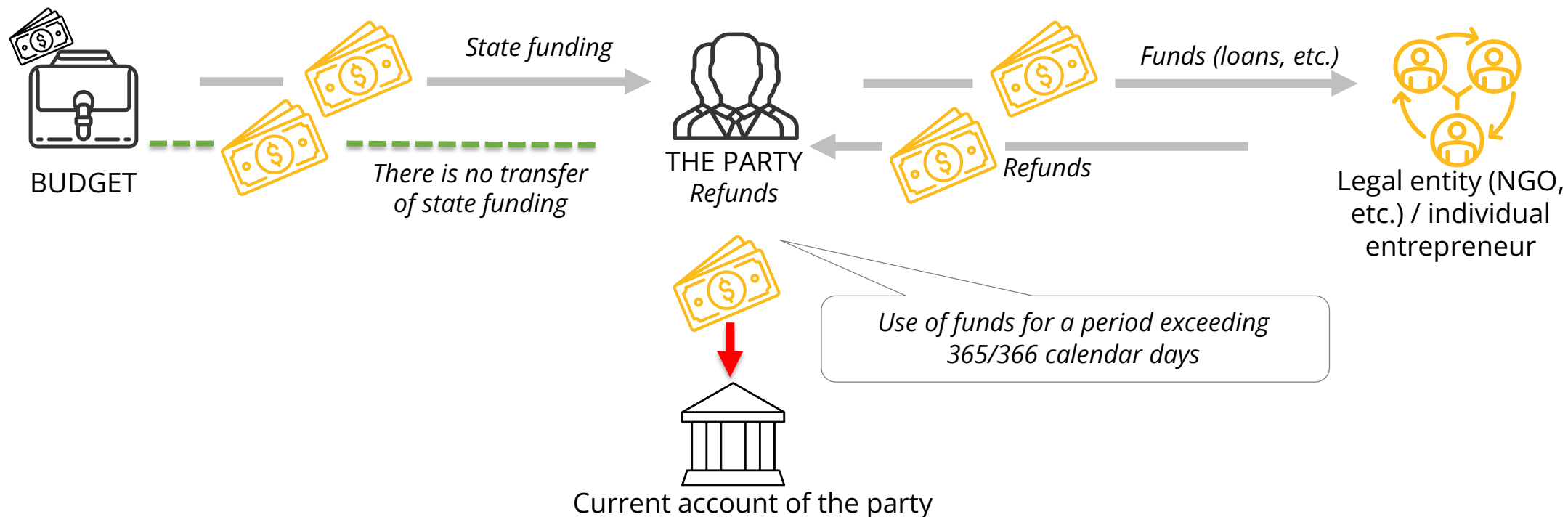
- provision of services and goods in excess of the amount recorded as a result of the analysis of external information.

### Consequences:

#### For the party:

- suspension of funding
- criminal liability is provided for.

## SITUATION 8. Return unused state funding to the budget in a timely manner



### Typical signs:

- return of state funding by counterparties to other accounts of the political party;
- the counterparty is a related party.

### Consequences for the party:

- issuance of an order by the NACP to oblige the Party to transfer funds to the State Budget within the timeframe stipulated by part 3 of Article 20 of the Law of Ukraine "On Political Parties in Ukraine" and negative consequences in case of failure to do so.



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