



# ANTI-CORRUPTION STUDIES

THE MASTER'S PROGRAM

**COURSE**

**ANTI-CORRUPTION  
COMPLIANCE**

2025/26



*Цей навчальний курс став можливим завдяки фінансовій підтримки Міжнародного фонду «Відродження». Зміст цього навчального курсу не обов'язково відображає погляди Міжнародного Фонду «Відродження».*

**Lecturers:**

**Ario Deghani,**

Counsel, Sayenko Kharenko law firm.

# SCHEDULE

Nº	Topic	Date	Time	Type of class	Room
1.	What is the purpose of compliance?			Lecture workshop	online 
2.	Most important regimes applicable to Ukraine – anti-bribery, anti-fraud, tax evasion, etc.			Lecture workshop	
3.	Regulatory compliance risks – EU and Ukraine			Lecture workshop	
4.	Compliance risks in M&A projects in Ukraine			Lecture workshop	
5.	Building a robust compliance management system in Ukraine			Lecture Workshop	
6.	Conducting internal compliance investigations – best practices			Lecture Workshop	

## Course rules and requirements: Grade for the course:

ECTS Grade	Scores (Points)	Signification
A	91-100	Excellent
B	81-90	Very Good
C	71-80	Good
D	66-70	Satisfactory
E	60-65	Sufficient
F	30-59	Insufficient
F	0-29	Failed

### Grade for the course consists of two parts

One part 60 %			Second part 40 %	
Tests	Attending classes	Participating in class discussion	Final exam (Writing task)	
1 to 20 points	20 points 2 points per class	20 points 2 points per class	40	A
			32	B
			24	C
			16	D
			8	E

All the works should be send through the electronic platform.

#### **Course website**

Program, announcements and study materials will be on the website of ACREC: <https://acrec.org.ua/>

## **Plan and description of the Course**

### **Anti-Corruption Compliance**

# TOPIC 1.

## WHAT IS THE PURPOSE OF COMPLIANCE?

### Agenda

- Definition and meaning of compliance
- The most important compliance areas
- Systems and elements
- Costs and benefits

### Brief description:

What is meant with the term “compliance”? Many people understand something differently. It depends if they are active in the public sector or in the private sector. It depends if they live and work in Ukraine or e.g. , in German or the U.S. The reception of the term is so different as cultures among mankind. The role of compliance is getting more and more important, not only in western hemispheres. The private and the public sector understand compliance differently, but should approach this topic based on the same principles.

### Materials

- 👁️ OECD online platform (<http://www.oecd.org/general/searchresults/?q=compliance>);
- 👁️ Compliance in the public sector (<https://www.oag.govt.nz/reports/docs/compliance-in-public-sector.pdf/view>)
- 👁️ Compliance in the private sector

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## TOPIC 2. MOST IMPORTANT REGIMES APPLICABLE TO UKRAINE – ANTI-BRIBERY, ANTI- FRAUD, TAX EVASION, ETC.

### Agenda

#### **Session 1. Legal framework structures (U.S., UK, Dutch law):**

- ⦿ Legal acts pyramid (e.g., FCPA = case law and its role = guidelines and opinions).
- ⦿ Summary of the foreign regimes applicable to Ukraine – multiplied jeopardy.
- ⦿ Regimes' reach in Ukraine (e.g., international treaties, intergovernmental cooperation, extradition and statutory limitations extensions).
- ⦿ Emerging trends and regimes (e.g., Irish BA, FEPA, SCCE, etc.).
- ⦿ Ukrainian anti-bribery standards.

#### **Session II:**

- ⦿ Applicable foreign and local enforcement structures - who can investigate and how?
- ⦿ Theoretical and practical exposure (case law) for companies and individuals:
- ⦿ Liability range;
- ⦿ Penalty credit and sentencing principles.

### Brief description:

A compliance system does not consist only of policies and one employee who calls himself/herself a Compliance Officer. It is not even close to start from that point. Not every company or private sector office has the need for the same compliance system. We will talk about the way to receive a good understanding of the compliance needs of every company or public office. We will talk about the role of a compliance function and the importance of some minimum requirements of every compliance system.

## TOPIC 3. REGULATORY COMPLIANCE RISKS — EU AND UKRAINE.

### Agenda

- EU angle — application principles.
- Ukrainian regulatory compliance — heading toward EU standards.
- Ukraine EU Harmonization - (e.g., completion status and most relevant updates, ACCA).
- Extraterritorial application (e.g., GPRS, EU Digital Services Act).
- EU/Ukraine — liability principles and case law.

## TOPIC 4. COMPLIANCE RISKS IN M&A PROJECTS IN UKRAINE.

### Agenda

- Role and value of compliance in M&A transactions — from pre-M&A to post-M&A stage
- Compliance due diligence/risk assessment
- Theoretical and practical exposure
- Successor's liability

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## TOPIC 5: BUILDING A ROBUST COMPLIANCE MANAGEMENT SYSTEM IN UKRAINE.

### Agenda

- ▶ Ukrainian legislation requirements for compliance programs.
- ▶ Best-practice standards suggested for implementation.
- ▶ Baker McKenzie's Five Essential Elements of Corporate Compliance.
- ▶ Certification.
- ▶ Ensuring «enforceability» of the compliance system in the Ukrainian legal framework.

## TOPIC 6: CONDUCTING INTERNAL COMPLIANCE INVESTIGATIONS — BEST PRACTICES.

### Agenda

- ▶ When should an investigation be conducted?
- ▶ Anti-bribery/fraud, regulatory and data breach investigations
- ▶ Who should conduct an internal investigation?
- ▶ Major stages of investigations
- ▶ Planning and scoping
- ▶ Document and forensic review
- ▶ Interviews
- ▶ Preparation of the report
- ▶ Post-investigation measures
- ▶ Major rules to be considered
- ▶ Cooperation with enforcement authorities (e.g., DOJ, SFO, market surveillance, DPAs)
- ▶ Post-investigation mitigation steps

# LECTURER



## Ario Dehghani

### Practices

- compliance
- data protection and privacy
- EU law
- German desk

### Industries

- FMCG and retail
- food and beverage
- pharmaceuticals and medical devices

Ario Dehghani has over 10 years of professional experience in the fields of compliance, data protection and privacy, white collar investigations and EU law. Ario worked for more than seven years at the Hogan Lovells' Munich office, where he focused on white collar, compliance and internal investigations. Ario Dehghani is one of the most experienced experts in Ukraine in preventing, identifying, eliminating and mitigating compliance risks at both national and global levels. He advises clients on all types of compliance matters and regularly handles sophisticated internal investigations related to, amongst others, FCPA and UK Bribery Act issues. His areas of expertise cover anti-bribery, anti-corruption, anti-money laundering, sanctions, data protection, regulatory and product compliance matters. Ario is also adept at performing compliance due diligence, implementing and auditing internal compliance systems, conducting compliance investigations and delivering customised training for in-house compliance officers. He has extensive experience across a variety of sectors, including the chemical, life science, electronic, IT, automotive, consumer goods and energy sectors.

Ario provides courses on German private and public law and holds open lectures on Compliance and EU law topics. He is a Co-Director of the Institute of German Law at the National University Kyiv-Mohyla Academy (NaUKMA), an interdisciplinary institution of comparative research with a focus on German and Ukrainian law.

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