

UDC 336.7

JEL G20, G21, G28

DOI 10.32782/2617-5940.1.2025.8

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FINANCIAL MONITORING IN UKRAINE

Abstract. The research is devoted to the analysis of the role of the National Bank of Ukraine in ensuring the effectiveness of financial monitoring as a key element of ensuring the financial security of the state. The paper highlights the peculiarities of financial monitoring in Ukraine, identifies the main tasks and mechanisms for its implementation in the context of current economic challenges. The legal framework governing financial control in the country, including legislative initiatives and Ukraine's international obligations in the field of combating money laundering and terrorist financing (AML/CFT), is considered. The role of state regulators, in particular the National Bank of Ukraine, in creating an effective system of supervision over financial transactions and ensuring an appropriate level of coordination between banking and non-banking institutions is investigated. Particular attention is paid to the adaptation of the national financial monitoring system to international standards and recommendations of such organisations as the Financial Action Task Force on Money Laundering (FATF), the Organisation for Economic Co-operation and Development (OECD) and the Basel Committee on Banking Supervision. The author analyses real-life examples of violations in the field of financial monitoring, which demonstrate the existing gaps in regulation and indicate the need to improve regulatory policy. Potential areas for improving the financial control system are identified, including increasing the transparency of financial transactions, introducing the latest data analysis technologies, expanding the possibilities for cooperation between government agencies and financial institutions, and increasing liability for violations in this area. The paper formulates practical recommendations for further development of the financial monitoring system in Ukraine aimed at increasing its effectiveness in the context of growing financial threats and economic instability. The emphasis is placed on the need for an integrated approach to financial supervision that takes into account both national peculiarities and international experience in combating financial fraud and money laundering.

Keywords: financial monitoring, financial security, banking supervision, international standards, financial offences.

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ФІНАНСОВИЙ МОНІТОРИНГ В УКРАЇНІ

Анотація. Наукове дослідження присвячене аналізу ролі Національного банку України у забезпеченні ефективності фінансового моніторингу як ключового елемента гарантування фінансової безпеки держави. У роботі висвітлено особливості функціонування фінансового моніторингу в Україні, визначено основні завдання та механізми його реалізації в умовах сучасних економічних викликів. Розглянуто нормативно-правову базу, що регулює фінансовий контроль у країні, включаючи законодавчі ініціативи та міжнародні зобов'язання України у сфері протидії відмиванню коштів і фінансуванню тероризму (ПВК/ФТ). Досліджено роль державних регуляторів, зокрема Національного банку України, у створенні ефективної системи нагляду за фінансовими операціями та забезпеченні належного рівня координації між банківськими та небанківськими установами. Особливу увагу приділено адаптації вітчизняної системи фінансового моніторингу до міжнародних стандартів та рекомендацій таких організацій, як Група з розробки фінансових заходів боротьби з відмиванням грошей (FATF), Організація економічного співробітництва та розвитку (ОЕСР) та Базель-

ський комітет з банківського нагляду. Проаналізовано реальні приклади порушень у сфері фінансового моніторингу, що демонструють існуючі прогалини в регулюванні та вказують на необхідність удосконалення регуляторної політики. Визначено потенційні напрями вдосконалення системи фінансового контролю, включаючи підвищення прозорості фінансових операцій, запровадження новітніх технологій аналізу даних, розширення можливостей співпраці між державними органами та фінансовими установами, а також посилення відповідальності за порушення у цій сфері. У роботі сформовані практичні рекомендації щодо подальшого розвитку системи фінансового моніторингу в Україні, спрямовані на підвищення її ефективності в умовах зростаючих фінансових загроз та економічної нестабільності. Зроблено акцент на необхідності комплексного підходу до фінансового нагляду, що враховує як національні особливості, так і міжнародний досвід у боротьбі з фінансовими махінаціями та відмиванням коштів.

Ключові слова: фінансовий моніторинг, фінансова безпека, банківський нагляд, міжнародні стандарти, фінансові правопорушення.

Introduction. In the context of economic instability, which is exacerbated by both external and internal factors, the financial monitoring system plays a critical role in ensuring the sustainability of the state and preventing financial abuse. Such violations can not only negatively affect the economic situation in the country, but also pose a threat to its national security.

Given the constant changes in the legislation governing financial monitoring, it is important to study the mechanisms of interaction between financial market participants – both banking and non-banking institutions – in fulfilling the requirements of national and international regulations. An analysis of these processes allows us to identify existing shortcomings and develop effective methods to address them.

Literature review. The issues of improving financial monitoring in Ukrainian banks and assessing compliance risks have been widely reflected in scientific research. In particular, Vovchak O. D. and Yendorenko L. O. [1] analyse internal control instruments in the banking system, focusing on modern compliance challenges.

The regulatory and legal framework for financial monitoring is set out in the Law of Ukraine No. 361-IX [2], which is a key document in the field of combating money laundering. In the international context, the FATF recommendations and reports [4], as well as OECD publications [3], which define risk assessment standards and methodologies for preventing financial crime, play an important role.

Researchers pay considerable attention to international experience and risk assessments at the national level [5], which allows adapting global practices to Ukrainian realities. The work of O. Smaglo [6] reveals the functioning of financial monitoring in Ukraine, in particular, through the prism of interaction with state institutions.

The issue of protecting the rights of financial services consumers in the context of financial monitoring is covered in the manual by Plotnikova M. V. and co-authors [7], which presents European approaches to regulating the financial services market. Gladush V. O. [8] focuses on the need to adapt the banking system to European monitoring standards.

Kozlova Y. S. [9] analyses the administrative and legal status of the National Bank of Ukraine as a subject of state financial monitoring, revealing its structural construction and functions.

Practical aspects of the functioning of financial monitoring are presented on the official web resources of the National Bank of Ukraine [10; 11; 13; 14], as well as the State Financial Monitoring Service [12; 15], which contain statistical information, analytical reports and regulatory documents. In particular, the annual report of the State Financial Monitoring Service for 2024 [15]

reflects in detail the results of international cooperation and risk assessment for the reporting period.

Methodology. A comprehensive approach was used to assess the effectiveness of financial monitoring in Ukraine. First of all, a detailed analysis of the legal framework governing financial monitoring was carried out, which allowed us to identify the peculiarities and potential gaps in the legislation that may affect the effectiveness of the system.

The NBU's performance is assessed using analytical methods that allow not only to examine the regulatory framework but also to determine the level of compliance with the regulatory norms by the NBU itself and entities under its supervision.

The main part. Ukraine is experiencing an aggravation of problems related to the strengthening of informal economic processes, growing social instability, weakening of state control over the financial system, and a decrease in public confidence in government agencies and financial institutions. In addition, in the context of martial law, there is a risk of establishing ties with international criminal groups, which facilitates the legalisation of illegal proceeds and the financing of terrorist activities [1].

To improve the effectiveness of the fight against financial crime, Ukraine is actively developing its financial supervision system. In particular, in 2020, the Law 'On Prevention and Counteraction to the Legalisation of the Proceeds of Crime, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction' was adopted [2].

The law clearly defines the requirements for primary financial monitoring entities, including banks, non-bank financial institutions and other financial service providers. They are obliged to identify customers, analyse sources of funds, monitor suspicious financial transactions and transmit relevant information to the State Financial Monitoring Service of Ukraine (SFMSU) [6].

In addition, the legislation provides for the possibility of blocking or freezing financial assets in case of reasonable suspicion of their illegal origin or potential use in criminal schemes. This significantly strengthens anti-money laundering measures and is an important tool of financial control.

Also, the implementation of international standards plays an important role in the fight against financial crime. The main global regulator in this area is the Financial Action Task Force (FATF) [3].

This organisation develops recommendations to prevent illicit financial flows, including terrorist financing. The FATF analyses the latest threats, including financial flows related to terrorist groups, human trafficking, money laundering through complex offshore schemes, etc [4].

Apart from international FATF recommendations, Ukraine is actively implementing national and international strategies to minimise money laundering risks. One of the key tools in this area is national risk assessments, which allow identifying the most vulnerable economic sectors and directing resources to protect them [5].

The effective implementation of international financial monitoring standards depends on the clear coordination of all financial market participants. Banks and other financial institutions are obliged to monitor suspicious transactions, conduct thorough customer due diligence and ensure transparency of financial transactions. This creates an early warning system, which is a key element in the fight against financial crime at both the national and global levels.

In addition to the FATF, the standards developed by the Basel Committee on Banking Supervision and the Organisation for Economic Co-operation and Development (OECD) play an important role in international financial regulation. These organisations implement standards for managing financial risks, combating tax evasion and ensuring due diligence in banking activities [7; 8].

An analysis of Ukraine's banking system has shown an increase in the number of financial crimes in this area. Some bank employees, in order to enrich themselves, facilitate the illegal use of funds by assisting participants in fraudulent schemes to legalise shadow financial flows and withdraw capital from the country. Such actions contribute to economic instability.

According to official data, in 2019, there were 77 banks operating in Ukraine, but by 2024, their number had fallen to 63. This trend demonstrates a gradual decrease in the number of financial institutions, which may be due to the liquidation of insolvent banks, stricter regulatory requirements, or external factors, including war and macroeconomic instability. The number of banks with foreign investments has also decreased: in 2019, there were 37 of them, and in 2024, there were 27. That is, this figure has decreased by 10 institutions over five years, which indicates a decline in the activity of foreign investors in the banking sector of Ukraine (Figure 1).

The National Bank of Ukraine applies various enforcement measures to financial institutions that do not comply with the requirements of the applicable financial monitoring legislation. According to the NBU Board Resolution No. 106 dated 28 July 2020, the regulator is authorised to take measures such as issuing written warnings, imposing fines, revoking licences, and applying other sanctions as provided for [9].

In 2024, the National Bank of Ukraine imposed financial sanctions on a number of banking institutions for violating financial monitoring rules, improper customer due diligence, and non-compliance with currency legislation.

The largest fine was imposed on RVS BANK JSC – UAH 135.15 million for violations in the field of financial monitoring and an additional UAH 50 thousand for non-compliance with the procedure for foreign exchange settlements (Table 1).

The main violations that led to the imposition of sanctions included inadequate control of high-risk clients, ineffective risk management, provision of inaccurate information to the regulator, and non-compliance with foreign exchange legislation.

The imposed sanctions demonstrate that the National Bank of Ukraine is strengthening its control over the activities of financial institutions and requires strict compliance with financial monitoring and risk management requirements (Figure 2).

An analysis of the dynamics of the number of reports submitted by financial institutions to the State Financial Monitoring Service in 2019–2024 shows a significant reduction in their volume. Thus, in 2019, the highest level of reporting was observed: banks submitted 11,327,040 reports, and non-bank institutions – 110,334. However, in 2020, there was a sharp decline: financial institutions submitted 4,675,432 reports, which is almost 2.5 times less, and non-bank organisations submitted 50,105 reports. Between 2019 and 2023, the total amount of information provided decreased almost eightfold.

However, the situation changed in 2024: The State Financial Monitoring Service of Ukraine recorded a

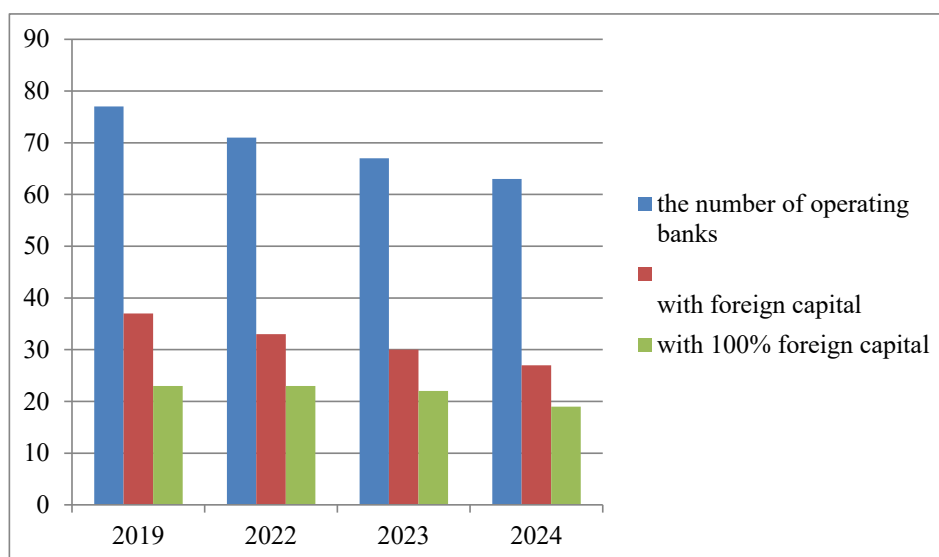


Figure 1. The number of banking institutions in Ukraine during 2019–2024

Source: compiled by the author based on data [10]

Table 1

Financial sanctions against banks for violations of financial monitoring

Name of the bank	Violation
JSC BANK ALLIANCE"	a fine of UAH 15,051,000 for improper performance of obligations to implement enhanced due diligence measures for high-risk customers and monitor business relationships and financial transactions of customers.
JSC "Ukrainian Bank for Reconstruction and Development"	a fine of UAH 14,071,760.68 for improper organisation and conduct of initial financial monitoring, including the lack of effective risk management and proper customer due diligence.
JSC "RVS BANK"	a fine of UAH 135,150,000 for improper organisation and conduct of primary financial monitoring, as well as a fine of UAH 50,000 for non-compliance with the procedure for settling foreign exchange transactions.
Radabank JSC	a fine of UAH 2,000,000 for improper application of a risk-based approach in its operations.

Source: compiled by the author based on data [13; 14]

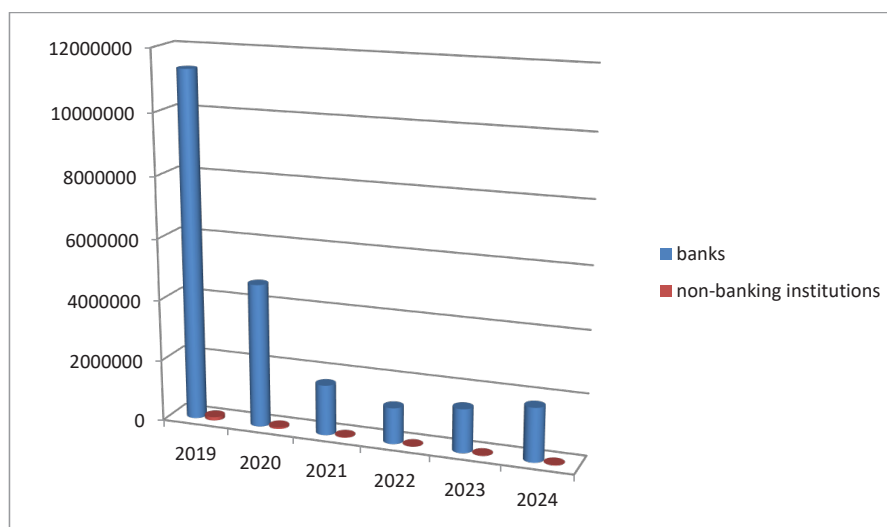


Figure 2. Analysis of the dynamics of reports on bank financial transactions received by the State Financial Monitoring Service in 2019–2024

Source: compiled by the author based on data [11]

significant increase in the number of reports on financial transactions subject to monitoring [12].

Among the reports received, 80% (1.05 million) were data on threshold transactions exceeding UAH 400 thousand within one month. The remaining 20% (254,500) contained information on suspicious transactions that could be related to money laundering, corruption schemes, or terrorist financing.

Based on the analysis of the information received, the State Financial Monitoring Service prepared 780 analytical materials, which were submitted to law enforcement agencies. The total amount of detected suspicious transactions was UAH 53.1 billion. Most of the materials were submitted to the National Police of Ukraine – 223 cases with a total amount of over UAH 15 billion, as well as to the Security Service of Ukraine – 218 cases worth UAH 9.7 billion (Figure 3).

Ukraine's banking system demonstrates positive development prospects and a sufficient level of capitalisation. The graphical data shows a gradual increase in the core capital adequacy ratio over the next three years, which indicates an expected strengthening of the banking sector's financial resilience. The resilience analysis confirms the system's ability to withstand potential risks and maintain stability.

The outlook for bank capitalisation indicates that some financial institutions need to raise additional funds to

ensure uninterrupted operations. The main challenges they face are related to low operational efficiency, high costs of banking operations, and increased credit risks [17].

The Figure 4 allows to assess the financial strength of banks by comparing their capitalisation with the standards. Financial institutions must reach certain capital levels by September 2024 and March 2026. In 2025, the NBU plans to resume stress testing with macroeconomic scenarios. The NBU is gradually winding down its anti-crisis measures, which indicates that the financial system is stabilising.

In 2023, the requirements of Regulation No. 351 for verifying collateral and recognising debtors' defaults were restored. New signs of default for legal entities were defined, including the loss of assets or markets. By October 2024, banks must update and submit business recovery plans to the NBU. Since 2023, operational risk has been fully taken into account in capital calculations, and in 2024, liquidity and risk management requirements have been tightened [11].

Since 31 August 2016, the National Bank of Ukraine has been publishing monthly reports on its website on enforcement actions taken against banks that have violated financial monitoring requirements. The reports indicate the type of violation and the sanctions imposed, which contributes to the transparency of the banking system [1].

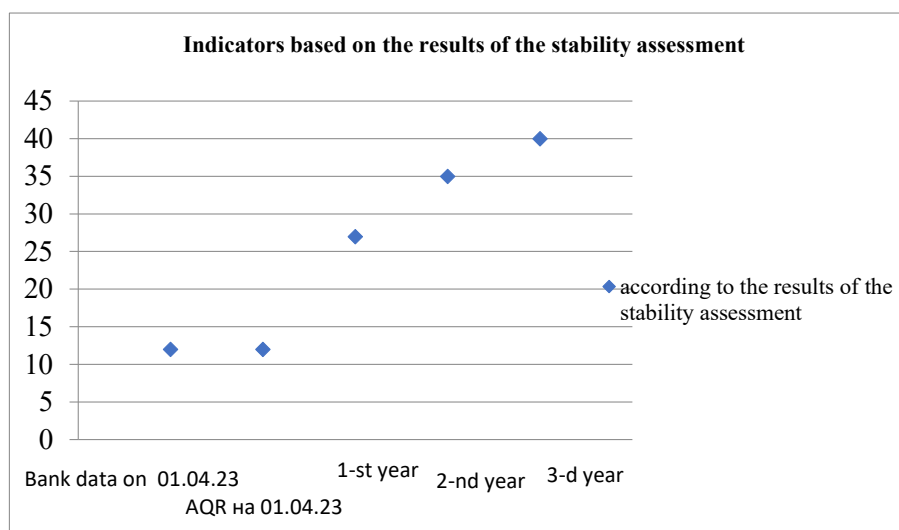


Figure 3. Analysis of the dynamics of reports on bank financial transactions received by the State Financial Monitoring Service in 2019–2023

Source: compiled by the author based on data [11]

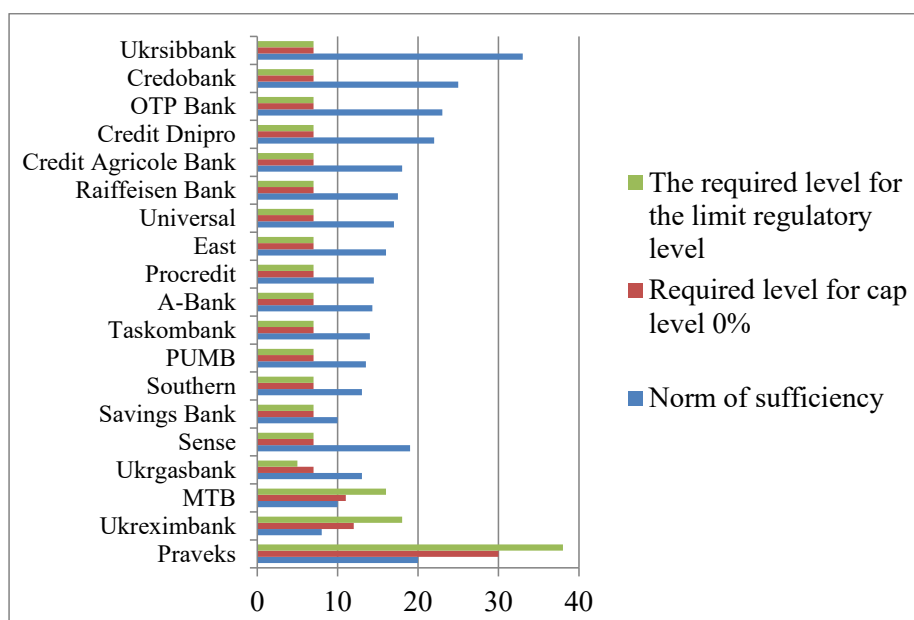


Figure 4. Capital adequacy levels that banks must adhere to

Source: compiled by the author based on data [11]

An effective compliance system in a bank is based on the cooperation of the supervisory board, the management board and a specialised unit. It ensures coordination between structural units, information exchange and consultations.

Successful banks create an independent compliance unit, implement risk management and modern control approaches. Internal compliance culture, monitoring of standards and continuous training of employees are key. This guarantees stability and competitiveness in the financial market [1].

In 2024, with the support of the SFMSU and with the assistance of international organisations such as the UNODC, the OSCE and the Council of Europe Office in Ukraine, a series of training events were organised on key issues in the field of combating financial crime [15].

During the year, the SFMSU established contacts with 84 foreign FIUs. As part of this cooperation, the SFMSU sent 621 information requests to 60 FIUs and, in turn, received 733 responses from 57 foreign partners. At the same time, the SFMSU received 234 requests from 49 foreign FIUs, to which Ukraine provided 318 responses, covering 50 financial intelligence units (Figure 5).

The SFMSU continued its active international activities, maintaining an effective exchange of information with foreign financial intelligence units (FIUs) and global structures working to combat money laundering and terrorist financing.

The active international cooperation of the State Financial Monitoring Service of Ukraine helps to strengthen the global financial supervision system,

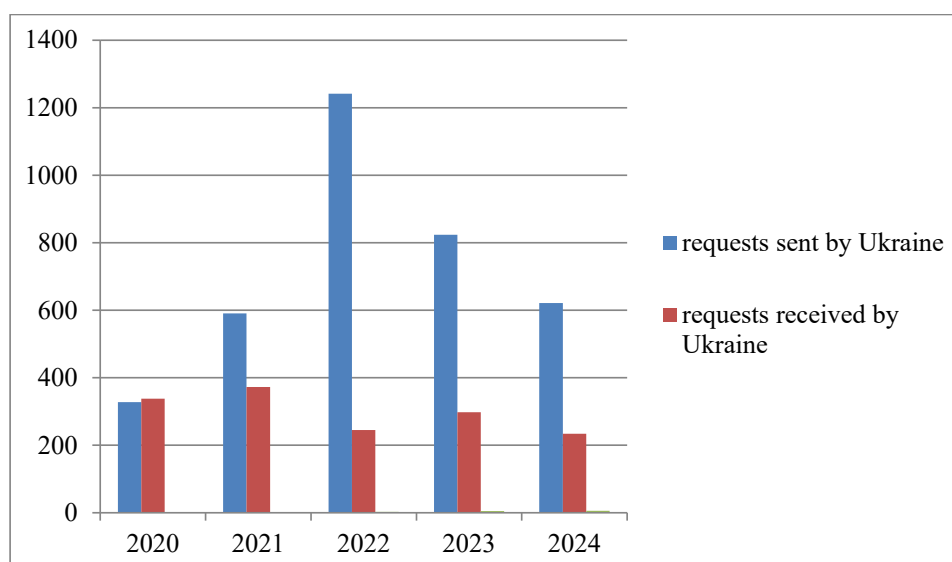


Figure 5. International cooperation of the State Financial Monitoring Service of Ukraine with the FIUs of other countries

Source: compiled by the author according to [15]

ensuring timely response to threats and effective detection of illegal financial transactions.

There are two main models in the field of preventing and combating money laundering: European and American. The European approach is characterised by more lenient regulation: banks are not required to inform the relevant authorities of every financial transaction that exceeds a certain threshold. Reports are submitted only in cases where the transaction is reasonably suspicious [16].

The American system, by contrast, is stricter. In the United States, financial institutions are required to report all transactions exceeding USD 10,000, regardless of whether they appear suspicious.

Modern technological changes actively influence the development of monitoring systems that penetrate all spheres of public life. Primary monitoring serves as the main mechanism for collecting information used to make management decisions. Its effectiveness depends on the accuracy, speed and completeness of the data [17].

In the period 2020–2024, there were positive transformations in the activities of financial monitoring entities, in particular in the field of digitalisation. While in 2020, only 40% of entities used electronic tools, in 2024 this figure reached 85%. Investments in the development of monitoring systems in 2024 totalled UAH 950 million, which confirms the interest of the state and business. The number of institutions using Big Data technologies has also increased significantly, from 20% to 75%.

This approach provides a deeper analytical level and effective solutions. The overall efficiency of monitoring activities increased from 60% in 2020 to 85% in 2024. High-tech tools have a positive impact on the speed of information processing. The introduction of artificial intelligence plays a separate role, improving forecasting accuracy. AI is particularly effective in environmental monitoring, where it helps to predict possible environmental risks. Together, artificial intelligence and big data technologies form a new standard for the quality of information analysis in monitoring systems [17].

Financial institutions today face the need to modernise their risk management approaches to meet new regulatory standards. With the outbreak of full-scale aggression against Ukraine, the national financial intelligence agency changed its focus and strengthened cooperation with international organisations.

One of the priorities was to facilitate the expulsion of Russia from the FATF and its inclusion in the blacklist. Coordination with MONEYVAL and the Egmont Group is being actively established to put sanctions pressure on the aggressor state. Much attention is paid to cooperation with regional FATF structures, such as the APG, to ensure the international isolation of Russia [18].

A separate vector of work is joint investigations with foreign FIUs, cooperation with financial regulators and the cryptocurrency community to counteract Russian business activities. It also blocks the financial assets of collaborators, analyses transactions, transfers data to investigative authorities, and participates in international initiatives such as the Task Force. The National Risk Assessment and analysis of threats posed by Russia to global financial stability are being conducted [18].

The full-scale war has introduced serious complications into the financial monitoring system, exacerbating existing risks. At the same time, the development of digital technologies, tighter regulation and close international cooperation make it possible to effectively combat financial crime. To maintain financial security, it is important to continuously improve these mechanisms and respond promptly to new challenges.

Conclusions. Financial monitoring is an effective mechanism in the fight against money laundering. However, its effectiveness depends to a large extent on the quality of the implementation of appropriate control measures by banks and other financial institutions. The National Bank of Ukraine plays a key role in financial monitoring. As the central financial supervisory authority, it develops regulations for primary control entities, analyses the activities of banks and non-bank financial institutions in the area of preventing

money laundering and terrorist financing, and conducts independent audits.

Ukraine is actively integrating international standards in the field of financial monitoring aimed at combating money laundering and terrorist financing, gradually adapting its legislation in accordance with the recommendations of international organisations such as the FATF, the OECD and the Basel Committee.

The financial monitoring system in Ukraine continues to evolve to adapt to the wartime environment. The reduction in the number of banking institutions and their branches is evidence of the process of cleaning up the banking sector and gradually bringing it into line with European standards. However, financial crimes remain a serious challenge, as fraudulent schemes and money laundering operations are often carried out with the participation of bank employees.

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Стаття надійшла до редакції 16.04.2025