



Normative Power Ukraine?

Understanding EU Anti-Corruption Norms in Ukraine's Accession Process

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Abstract

Anti-corruption reform is foundational for Ukraine's accession to the European Union. Although accession conditionality has become a key driver of reform, formal requirements alone provide only a partial insight into how anti-corruption reform is advanced in practice. This thesis examines how EU-promoted anti-corruption norms acquire meaning and practical significance through their interaction with domestic actors engaged in reform efforts in Ukraine. Drawing on insights from Europeanisation, vernacularisation, and socio-legal scholarship, this study adopts a qualitative case study approach combining analysis of key EU strategic documents with semi-structured interviews conducted with ten Ukrainian anti-corruption professionals (March 2026). The findings indicate that EU-promoted anti-corruption norms are not simply transferred through accession conditionality but are actively interpreted, translated, and operationalised by domestic actors. While EU conditionality provides a key source of reform leverage, the advancement of anti-corruption reform is also shaped by the agency of domestic actors who embed accession-related priorities within domestic reform processes. The thesis foregrounds the role of domestic actors in shaping how EU-promoted norms are translated into practice and contributes to a more actor-oriented understanding of EU norm diffusion.

Keywords: Ukraine, European Union Accession, Anti-Corruption Reform, Norm Diffusion, Europeanisation, Vernacularisation, Domestic Actors, EU Conditionality

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1. Introduction

“Ukrainian citizens made this choice to be part of the European Union, and they are paying in blood for that choice”, remarked an anti-corruption actor during one of the interviews conducted for this thesis.¹ The remark captures the significance that European Union membership has acquired in Ukraine, where, for many Ukrainians, accession is associated with the prospect of a more secure future.² On the 28th of February 2022, four days after the outbreak of Russia’s full-scale invasion, Ukraine applied for membership of the European Union.³ Ukraine’s EU accession process involves extensive political, legal, and institutional reforms aimed at aligning domestic legislation and governance structures with the EU *acquis*.⁴ Among the reforms required for EU accession, anti-corruption reform measures occupy a central position, accompanied by a range of benchmarks, institutional requirements, and expectations for progress. However, formal accession requirements alone provide only a partial insight into how domestic anti-corruption reform is advanced. This raises important questions regarding how EU anti-corruption reform priorities are received by domestic actors involved in advancing anti-corruption reform in Ukraine.

This investigation explores how EU-promoted anti-corruption norms acquire meaning and practical significance through their interaction with domestic actors engaged in reform efforts in Ukraine. In doing so, it foregrounds the perspectives and experiences of Ukrainian anti-corruption actors involved in advancing reform efforts throughout the accession process. The Ukrainian case is particularly relevant for this investigation given the prominence of anti-corruption reform within the accession process and Ukraine’s continued pursuit of EU accession under conditions of full-scale war. Much of the previous research has generated insight into how EU-promoted norms diffuse across accession contexts and influence

¹ Interview with Respondent 7 (policy organisation representative), conducted by the author via Zoom, March 2026.

² From here on referred to as the EU.

³ European Commission, ‘Ukraine’s path towards EU accession’ https://commission.europa.eu/topics/eu-solidarity-ukraine/ukraines-path-towards-eu-accession_en accessed 28 April 2026.

⁴ European Union, ‘Acquis’ (EUR-Lex) <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=LEGISSUM:acquis> accessed 25 April 2026.

domestic reform processes.⁵ Particularly relevant is Ian Manners' concept of Normative Power Europe, which has informed understandings of the EU as an actor capable of shaping governance practices beyond its borders through the diffusion of norms and values.⁶ However, comparatively less attention has been given to how domestic actors themselves interpret and operationalise such norms within specific accession contexts. In this regard, the investigation's focus on domestic actors offers a useful lens through which to examine how EU-promoted norms are interpreted and translated into practice within accession contexts.

This thesis aims to contribute to a more actor-oriented understanding of EU norm diffusion by examining how domestic anti-corruption actors interact with EU-promoted anti-corruption norms within Ukraine's accession process. In particular, it focuses on how such norms are understood and operationalised by actors directly involved in anti-corruption reform.

To pursue this aim, the following research question and sub-question guide the investigation:

- How do Ukrainian anti-corruption actors understand and operationalise EU-promoted anti-corruption norms in advancing domestic anti-corruption reform during the accession process?
 - How are EU-promoted anti-corruption norms articulated in key EU strategic and accession-related documents?

To address these questions, this thesis adopts a qualitative case study approach centred on anti-corruption reform within Ukraine's accession process.⁷ The investigation combines an analysis of key EU strategic and accession-related documents with semi-structured interviews conducted with Ukrainian anti-corruption professionals.⁸ Taken together, this approach

⁵ I. Manners, 'Normative Power Europe: A Contradiction in Terms?' *Journal of Common Market Studies* 40.2 (2002) 235-258; Frank Schimmelfennig and Ulrich Sedelmeier, 'The Europeanisation of Eastern Europe: The External Incentives Model Revisited', *Journal of European Public Policy*, 27.6 (2020), pp. 814-833.

⁶ I. Manners, 'Normative Power Europe: A Contradiction in Terms?' *Journal of Common Market Studies* 40.2 (2002) 235-258, pp. 252.

⁷ R. K. Yin, *Case Study Research: Design and Methods*, 4th edn (London: SAGE 2009), p. 18.

⁸ See section 4.4. for ethical considerations.

enables an examination of both how EU-promoted anti-corruption norms are articulated within the accession framework and how they are understood and operationalised by actors involved in advancing reform efforts. This approach aims to facilitate an exploration of norm diffusion that moves beyond formal compliance and institutional adaptation to consider the role of domestic actors in shaping how anti-corruption norms are translated into practice.

2. Literature review and previous research

This literature review brings together the key academic debates and conceptual approaches relevant to understanding EU-driven anti-corruption reform within Ukraine's accession process. First, it situates the study within scholarship on the relationship between corruption and human rights. It then examines literature on Europeanisation, EU conditionality, and anti-corruption reform in accession contexts to position the study within broader debates on norm diffusion. Finally, it draws on insights from vernacularisation and socio-legal scholarship to foreground the role of domestic actors in shaping how EU-promoted norms are interpreted and operationalised in practice. In doing so, it establishes the conceptual foundations for the study's actor-oriented understanding of norm diffusion.

2.1. Corruption and the realisation of human rights

Within the literature, it is widely recognised that there is a clear relationship between corruption and the realisation of human rights.⁹ Through its effects on governance, rule of law, and access to justice, corruption impedes the ability of states to fulfil and protect human rights. In fact, scholars such as Anne Peters¹⁰ and Martine Boersma¹¹ argue that corruption may even constitute a violation of international human rights law, particularly when corrupt practices obstruct access to fundamental rights and undermine state protection mechanisms. However, within the literature, the extent to which corruption should be understood as a

⁹ Raoul Wallenberg Institute of Human Rights and Humanitarian Law, *Anti-Corruption and Human Rights: How Corruption Affects Human Rights and How Human Rights Can Contribute to Countering Corruption* (Lund: Raoul Wallenberg Institute of Human Rights and Humanitarian Law, 2018), p. 3.

¹⁰ A. Peters, 'Corruption as a Violation of International Human Rights', *European Journal of International Law*, 29.4 (2018), pp. 1251-1287.

¹¹ M. Boersma, *Corruption: A Violation of Human Rights and a Crime under International Law?* (Cambridge: Intersentia, 2012).

violation of human rights is contested. Julio Bacio-Terracino argues that “although all corrupt practices may in the long run affect a human right, this is not synonymous with a violation of rights”.¹² Thus, although corruption is widely understood to undermine the enjoyment of human rights, whether corruption itself constitutes a human rights violation remains contested.

Furthermore, the literature has highlighted how corruption undermines the governance and institutional conditions necessary for the protection and fulfilment of human rights. Several scholars, notably Susan Rose-Ackerman¹³ and Robert Klitgaard,¹⁴ argue that corruption erodes institutional accountability and limits access to public services and legal protections. Bo Rothstein and Aiysha Varraich¹⁵ conceptualise this relationship more explicitly, arguing that anti-corruption and human rights share a “normative basis” centred on justice, equality, and non-discrimination. Similarly to Rothstein and Varraich, Balakrishnan Rajagopal¹⁶ links corruption and human rights through a shared concern with state legitimacy, particularly the extent to which institutions protect the public interest and uphold rights protection. Collectively, this scholarship positions corruption and anti-corruption as fundamentally connected to institutional legitimacy and the protection of human rights.

The literature has also highlighted the significance of anti-corruption reform in strengthening the institutional frameworks through which human rights are protected. Alina Mungiu-Pippidi¹⁷ argues that anti-corruption reform is integral to upholding institutional integrity and public accountability. However, other scholars, such as Martin Mendelski¹⁸ and Agnes

¹² J. Bacio-Terracino, ‘Corruption as a Violation of Human Rights’, *International Council on Human Rights Policy*, (2008), pp. 1.

¹³ S. Rose-Ackerman, *Corruption and Government: Causes, Consequences, and Reform* (Cambridge, Cambridge University Press, 1999).

¹⁴ R. Klitgaard, *Controlling Corruption* (Berkeley: University of California Press, 1988).

¹⁵ B. Rothstein and Aiysha Varraich, ‘Corruption and Human Rights’, in *Making Sense of Corruption* (Cambridge: Cambridge University Press, 2017), pp. 58-69.

¹⁶ B. Rajagopal, ‘Corruption, Legitimacy and Human Rights: The Dialectic of the Relationship’ (1999) 14.2 *Connecticut Journal of International Law* 495, pp. 497-499.

¹⁷ A. Mungiu-Pippidi, *The Quest for Good Governance: How Societies Develop Control of Corruption* (Cambridge: Cambridge University Press 2015).

¹⁸ M. Mendelski, ‘The EU’s Pathological Power: The Failure of External Rule of Law Promotion in South Eastern Europe’. *Southeast European and Black Sea Studies*. 11.3 (2011) 345-365.

Batory¹⁹ caution that formal anti-corruption reforms do not necessarily translate into substantive improvements in governance, accountability, or the protection of human rights. Therefore, while the literature conceptualises anti-corruption reform as essential for the protection of human rights, it also questions the extent to which reforms can lead to meaningful improvements in governance and accountability.

2.2. Europeanisation

Research on Europeanisation has emphasised how the EU promotes governance and rule-of-law norms beyond its borders through processes of political and institutional reform. Ian Manners has made a significant contribution to this literature through his theorisation of the EU as a “normative power” that exerts influence through the diffusion of principles related to democracy, rule of law, and respect for human rights.²⁰ Subsequent scholarship has, however, critiqued Manners’ concept of normative power for overlooking the hierarchical and political aspects of EU norm diffusion. Michael Merlingen, for example, argues that processes of EU norm diffusion may also function as mechanisms of control through which institutional norms and standards are imposed.²¹ Despite such critiques, several scholars acknowledge the EU’s influence in shaping domestic reforms through the diffusion of governance and rule-of-law norms. Vivien Schmidt, for instance, foregrounds how Europeanisation is shaped through the “top-down influence of the EU on its member-states”.²²

In recent years, the literature on Europeanisation has increasingly centred on accession contexts, particularly the role of EU conditionality in shaping domestic governance structures and rule-of-law reforms within candidate states. Frank Schimmelfennig and Ulrich Sedelmeier have made a valuable contribution through their “External Incentives Model”,

¹⁹ A. Batory, ‘Why do Anti-Corruption Laws Fail in Central Eastern Europe? A Target Compliance Perspective’, *Regulation & Governance* 6.1 (2012) 66-82.

²⁰ I. Manners, ‘Normative Power Europe: A Contradiction in Terms?’ *Journal of Common Market Studies* 40.2 (2002) 235-258.

²¹ M. Merlingen, ‘Everything is Dangerous: A Critique of “Normative Power Europe”’, *Security Dialogue* 38.4 (2007) 435-453.

²² V. Schmidt, ‘The EU and its Member-States: From Bottom Up to Top Down’, in David Phinnemore and Alex Warleigh-Lack (eds), *Reflections on European Integration: 50 Years of the Treaty of Rome* (Palgrave Macmillan 2009), p. 194

which argues that candidate states are likely to adopt EU norms in response to reward-based incentives linked to accession.²³ Within this model, the credibility of incentives “stands out as a crucial condition for the success of EU conditionality”.²⁴ Yet scholars have questioned whether formal compliance with EU conditionality results in substantive domestic reform. Antoaneta Dimitrova argues that formally adopted EU rules may remain institutional “empty shells” in post-accession contexts.²⁵ Such arguments have also raised questions about the domestic legitimacy of EU conditionality. Gergana Noutcheva, for instance, argues that the “perceived lack of legitimacy opens up political space for domestic actors to contest the positions taken by the EU on normative grounds”.²⁶

Furthermore, these debates have informed subsequent research on the Ukrainian context, notably in relation to EU-driven anti-corruption reform. Marta Králiková makes a significant contribution by underscoring the “locally conditioned effectiveness of the EU’s normative power”.²⁷ Králiková argues that anti-corruption reform in Ukraine is shaped by clashes between EU-promoted norms and the local normative order.²⁸ Such literature has thus drawn attention to the importance of examining how local-level normative dynamics interact with EU-promoted norms. Michael Martin Richter similarly argues that EU anti-corruption conditionality has produced tensions between officially proclaimed reform progress and the local realities of implementation.²⁹

2.3. Vernacularisation and the localisation of norms

Much of the literature on vernacularisation emphasises that transnational norms acquire meaning through processes of local interpretation and adaptation. Sally Engle Merry’s

²³ F. Schimmelfennig and Ulrich Sedelmeier, ‘The Europeanisation of Eastern Europe: The External Incentives Model Revisited’, *Journal of European Public Policy*, 27.6 (2020), pp. 814-833.

²⁴ *Ibid.*, p. 814.

²⁵ A. L. Dimitrova, ‘The New Member States of the EU in the Aftermath of Enlargement: Do New European Rules Remain Empty Shells?’, *Journal of European Public Policy*, 17.1 (2010), pp. 137-148.

²⁶ G. Noutcheva, ‘Fake, Partial and Imposed Compliance: The Limits of the EU’s Normative Power in the Western Balkans’, *Journal of European Public Policy*, 16.7 (2009), pp. 1065-1084.

²⁷ M. Králiková, ‘Importing EU Norms: The Case of Anti-Corruption Reform in Ukraine’, *Journal of European Integration*, 44.2 (2022), 245-260, p. 245.

²⁸ *Ibid.*, p. 246.

²⁹ M. Martin Richter, ‘Victim of Its Own Success (?) – The European Union’s Anti-Corruption Policy Advice in Ukraine Between Grand Visions and (Geo)political Realities’, *Journal of Common Market Studies*, 62.5 (2024), pp. 1204-1221.

contribution has been particularly influential in demonstrating how transnational norms are translated and reconstructed to resonate within local normative contexts. Merry argues that the diffusion of transnational norms depends on processes of translation that render global ideas intelligible within local social contexts.³⁰ Similarly, Amitav Acharya argues that external norms are rarely adopted “wholesale”, but instead undergo processes of localisation through which they are adapted to existing local beliefs and practices.³¹ These contributions thus foreground the importance of understanding the processes through which external norms acquire meaning in local contexts.

Consequently, scholarly attention has moved beyond questions of norm adoption to examine the processes through which transnational norms are interpreted, negotiated, and translated in local contexts. Merry has underscored the role of intermediaries who operate between transnational and local arenas, translating norms into forms that resonate within particular social contexts.³² Lisbeth Zimmermann, notably, argues that existing approaches to norm localisation do not adequately account for the interaction between norm promoters and domestic actors.³³ Further, Zimmermann calls for greater attention to the role of domestic actors in shaping normative meaning through processes of interaction and translation.³⁴ Tobias Berger has underscored the role of translators within processes of norm localisation, arguing that normative meaning is continually reshaped as norms move through chains of interaction linking different actors and contexts.³⁵

Moreover, the literature has drawn attention to the social and institutional practices through which transnational norms acquire meaning in domestic contexts. In this regard, scholars such as Antje Wiener have demonstrated how normative meaning emerges through processes of contestation, as actors negotiate the interpretation and enactment of norms

³⁰ S. Engle Merry, ‘Transnational Human Rights and Local Activism: Mapping the Middle’, *American Anthropologist*, 108.1 (2006), pp. 38-51.

³¹ A. Acharya, ‘How Ideas Spread: Whose Norms Matter? Norm Localization and Institutional Change in Asian Regionalism’, *International Organization*, 58.2 (2004), pp. 239-270.

³² Merry, ‘Transnational Human Rights and Local Activism’ (n 22), p. 39.

³³ L. Zimmermann, ‘Introduction: Between Global Norms and Local Translation’ in *Global Norms with a Local Face: Rule-of-Law Promotion and Norm Translation* (Cambridge University Press 2017) 1-22, p. 3.

³⁴ L. Zimmermann, ‘More for Less: The Interactive Translation of Global Norms in Postconflict Guatemala’, *International Studies Quarterly* 61.4 (2017), pp. 774-785.

³⁵ T. Berger, ‘Linked in Translation: International Donors and Local Fieldworkers as Translators of Global Norms’, *Third World Thematics: A TWQ Journal* 2.5 (2017), pp. 606-620.

across different social contexts.³⁶ Wiener and Uwe Puetter have emphasised the significance of cultural validation, arguing that normative meanings are shaped by the social and cultural contexts in which norms are enacted.³⁷ Similarly, Anke Draude has underscored the agency of norm recipients, arguing that local actors actively participate in reshaping the meaning and functionality of externally promoted norms.³⁸

2.4. Socio-legal approaches and formal compliance

Socio-legal scholarship has long challenged the assumption that formal legal adoption provides an adequate indicator of how law operates in practice. Roscoe Pound's distinction between "law in books" and "law in action" highlighted the gap between formally adopted laws and their operation in social life.³⁹ Similarly, Eugen Ehrlich emphasised that the norms governing social conduct often diverge from those codified within formal legal institutions.⁴⁰ Other notable scholars, such as Sally Falk Moore, have highlighted how legal outcomes are shaped by social processes extending beyond formal legal frameworks.⁴¹ These contributions have underscored the limitations of formal legal adoption as a measure of legal and normative change.

Much of the subsequent socio-legal scholarship has focused on whether formal legal reform necessarily translates into corresponding changes in institutional practice. Scholars such as David Nelken have drawn attention to the persistent gap between law as formally adopted and law as socially practiced, arguing that the implementation of law is shaped by the social contexts in which it is enacted.⁴² Brian Tamanaha similarly argues that law cannot be understood independently of its social context, emphasising that formal legal institutions

³⁶ A. Wiener, 'Norms Lie in Practice' in *Contestation and Constitution of Norms in Global International Relations* (Cambridge University Press 2018) 27-49.

³⁷ A. Wiener and Uwe Puetter, 'The Quality of Norms Is What Actors Make of It: Critical Constructivist Research on Norms', *Journal of International Law and International Relations* 5.1 (2009), pp. 1-16.

³⁸ A. Draude, 'The Agency of the Governed in Transfer and Diffusion Studies', *Third World Thematics: A TWQ Journal* 2.5 (2017), 577-587.

³⁹ R. Pound, 'Law in Books and Law in Action', *American Law Review* 44.1 (1910), pp. 12-36.

⁴⁰ E. Ehrlich, *Fundamental Principles of the Sociology of Law* (Harvard University Press 1936).

⁴¹ S. Falk Moore, 'Law and Social Change: The Semi-Autonomous Social Field as an Appropriate Subject of Study', *Law & Society Review* 7.4 (1973), pp. 719-746.

⁴² D. Nelken, 'The "Gap Problem" in the Sociology of Law: A Theoretical Review' in *Beyond Law in Context: Developing a Sociological Understanding of Law* (Routledge 2009) 35-61.

often fail to reflect the realities of social practice.⁴³ Further, Gunther Teubner has highlighted how legal reforms introduced from external contexts interact with existing institutional and social structures, often producing outcomes different from those intended by reform designers.⁴⁴

Socio-legal scholarship has also drawn greater attention to the actors and institutional processes through which legal reforms are implemented. John Griffiths, for instance, foregrounds the “social working” of legal rules, arguing that the effects of law are shaped by the social contexts in which rules are followed.⁴⁵ Other scholars, such as Patricia Ewick and Susan Silbey, have argued that law acquires practical significance through the everyday ways in which actors engage with legal norms.⁴⁶ These socio-legal contributions thus underscore that understanding how legal norms operate in practice requires particular attention to the actors and institutional processes through which they are enacted.

2.5. Research gaps addressed

This thesis addresses several gaps identified in the literature. While scholarship on Europeanisation has generated significant insight into how EU norms are diffused through accession frameworks, less attention has been given to how domestic actors interpret and operationalise such norms beyond formal compliance. Similarly, insights from vernacularisation scholarship regarding processes of local interpretation and translation have rarely been applied to EU anti-corruption reform, particularly within the Ukrainian accession context. Socio-legal approaches have likewise rarely been brought into dialogue with studies of EU-driven anti-corruption reform. By drawing on these perspectives, the thesis develops a more actor-oriented understanding of norm diffusion that moves beyond predominantly top-down understandings.

⁴³ B. Z. Tamanaha, *A General Jurisprudence of Law and Society* (Oxford University Press 2001).

⁴⁴ G. Teubner, ‘Legal Irritants: Good Faith in British Law or How Unifying Law Ends up in New Divergences’, *Modern Law Review* 61.1 (1998), pp. 11-32.

⁴⁵ J. Griffiths, ‘The Social Working of Legal Rules’, *Journal of Legal Pluralism and Unofficial Law* 35.48 (2003), 1-84.

⁴⁶ P. Ewick and Susan S. Silbey, *The Common Place of Law: Stories from Everyday Life* (University of Chicago Press 1998).

3. Theoretical framework

This section outlines the theoretical framework that guides this thesis's investigation. It draws on key insights from Normative Power Europe and norm localisation to inform the actor-oriented approach adopted in this thesis. Taken together, these insights inform the thesis's understanding of how EU norms are diffused within third-country contexts.

3.1. Normative Power Europe

Ian Manners' conceptualisation of Normative Power Europe (NPE) provides a useful theoretical starting point for understanding how the European Union promotes and diffuses anti-corruption norms beyond its borders.⁴⁷ In essence, NPE understands the EU's influence as deriving from its ability to promote and diffuse norms and values that define standards of appropriate political conduct beyond the EU itself. This normative influence is exercised through the diffusion of principles such as democracy, human rights, the rule of law, and good governance, which together constitute core elements of the EU's normative identity.⁴⁸ These norms are diffused beyond the EU through a range of mechanisms that facilitate their transmission and reception within third-country contexts.⁴⁹ In the context of EU enlargement, accession conditionality serves as a key mechanism through which these norms are promoted and adopted within candidate states.⁵⁰ Anti-corruption reform can therefore be understood as part of the EU's normative agenda, reflecting commitments to transparency, accountability, and the rule of law.⁵¹

Within NPE, norm diffusion occurs through several distinct mechanisms operating between the EU and third-country contexts. These include contagion, informational diffusion,

⁴⁷ I. Manners, 'Normative Power Europe: A Contradiction in Terms?' *Journal of Common Market Studies* 40.2 (2002) 235-258, pp. 252.

⁴⁸ I. Manners, 'Normative Power Europe', pp. 242-243.

⁴⁹ I. Manners, 'Normative Power Europe Reconsidered: Beyond the Crossroads', *Journal of European Public Policy* 13.2 (2006), 182-199, pp. 184-185.

⁵⁰ F. Schimmelfennig and Ulrich Sedelmeier, 'Governance by Conditionality: EU Rule Transfer to the Candidate Countries of Central and Eastern Europe', *Journal of European Public Policy* 11.4 (2004) 661-679, pp. 663-664.

⁵¹ M. Králiková, 'Importing EU Norms: The Case of Anti-Corruption Reform in Ukraine', *Journal of European Integration*, 44.2 (2022), 245-260, p. 245.

procedural diffusion, transference, overt diffusion, and the cultural filter.⁵² Among these mechanisms, the cultural filter is of particular importance for this thesis. The cultural filter recognises that EU norms are interpreted through domestic social, political, and institutional contexts rather than being adopted uniformly across different settings.⁵³ Thus, the reception of EU norms varies considerably across contexts, with the cultural filter shaping the extent to which they are accepted, adapted, or resisted.⁵⁴ This is highly relevant in the context of anti-corruption reform, where EU norms interact with pre-existing domestic political and institutional conditions. For this thesis, the cultural filter serves as a useful lens through which to examine how EU-promoted anti-corruption norms are received within the Ukrainian accession context.

3.2. Beyond top-down norm diffusion

While Normative Power Europe serves as a theoretical foundation for this thesis's investigation, its understanding of norm diffusion as a predominantly top-down process provides less insight into how domestic actors shape normative outcomes.⁵⁵ Therefore, this approach alone is insufficient to investigate how EU anti-corruption norms are understood and operationalised within the Ukrainian accession context. In this thesis, the reception of externally promoted norms is understood as a key aspect of the diffusion process, as this shapes how norms are adopted and operationalised within domestic contexts.⁵⁶ Accordingly, this thesis is concerned not only with the diffusion of EU anti-corruption norms, but also with the domestic processes that shape how these norms are understood and operationalised. Particular attention is therefore directed towards the domestic processes through which EU anti-corruption norms are interpreted and operationalised, as these processes are central to

⁵² I. Manners, 'Normative Power Europe: A Contradiction in Terms?' *Journal of Common Market Studies* 40.2 (2002) 235-258, pp. 244-245.

⁵³ I. Manners, 'Normative Power Europe', pp. 245.

⁵⁴ I. Manners, 'Normative Power Europe', pp. 245.

⁵⁵ N. Chaban and Sharon Pardo, 'Understanding EU External Perceptions: Theorising Local "Cultural Filters" in the Normative Power Approach (case-study of textbooks)', *Australian and New Zealand Journal of European Studies* 10.1 (2018) 64-78, pp. 64.

⁵⁶ A. Acharya, 'How Ideas Spread: Whose Norms Matter? Norm Localization and Institutional Change in Asian Regionalism', *International Organization* 58.2 (2004) 239-275, pp. 241-242.

understanding how externally promoted norms are translated into domestic reform outcomes.⁵⁷

To complement the theoretical insights from Normative Power Europe, this thesis also draws on the concept of norm localisation, which places greater emphasis on the role of domestic actors in shaping normative outcomes.⁵⁸ By drawing on norm localisation, this thesis understands the reception of externally promoted norms as an active process through which domestic actors interpret and adapt norms within their own political and institutional contexts.⁵⁹ Accordingly, this thesis's theoretical framework is focused on the central role of domestic actors in shaping the meaning and implementation of externally promoted norms.⁶⁰ In this context, normative outcomes are understood as emerging through processes of interpretation and adaptation by domestic actors within particular political and institutional contexts. Norm localisation, by foregrounding the role of domestic actors, thus enables this thesis to move beyond a purely top-down understanding of norm diffusion.

3.3. Actor-Oriented understanding of norm diffusion

The previous sections have outlined how this thesis draws on theoretical insights from both Normative Power Europe and norm localisation to guide its investigation. Taken together, these frameworks inform this thesis's actor-oriented understanding of norm diffusion. Domestic actors are thus understood not simply as passive recipients of externally promoted norms, but as active participants in shaping normative outcomes.⁶¹ This thesis's approach directs attention towards the actors involved in anti-corruption reform, recognising their role

⁵⁷ A. Dandashly and Gergana Noutcheva, 'Conceptualizing Norm Diffusion and Norm Contestation in the European Neighbourhood: Introduction to the Special Issue', *Democratization* 29.3 (2022) 415-432, pp. 419-420.

⁵⁸ T. R. Eimer, S. Lütz and V. Schüren, 'Varieties of Localization: International Norms and the Commodification of Knowledge in India and Brazil', *Review of International Political Economy* 23.3 (2016) 450-479, pp. 451-455.

⁵⁹ A. Acharya, 'How Ideas Spread: Whose Norms Matter? Norm Localization and Institutional Change in Asian Regionalism', *International Organization* 58.2 (2004) 239-275, pp. 241-244.

⁶⁰ A. Draude, 'The Agency of the Governed in Transfer and Diffusion Studies', *Third World Thematics: A TWQ Journal* 2.5 (2017), 577-587, pp. 580.

⁶¹ M. Králiková, 'Importing EU Norms: The Case of Anti-Corruption Reform in Ukraine', *Journal of European Integration*, 44.2 (2022), 245-260, pp. 249.

in mediating how EU-promoted norms are translated into domestic reform processes.⁶² In doing so, this will enable the thesis to investigate how domestic actors interact with EU anti-corruption norms and how their responses influence domestic reform outcomes.

4. Methodology

This section outlines the methodological approach adopted in this thesis to investigate how EU-promoted anti-corruption norms are understood and operationalised within Ukraine's accession context. To address the research question, this thesis adopts a qualitative case study approach, which emphasises the use of multiple sources of evidence.⁶³ Accordingly, the investigation draws on both EU strategic documents and interviews with Ukrainian anti-corruption professionals. Together, these sources provide insight into how EU-promoted anti-corruption norms are articulated within official documents and how these norms are understood by domestic actors engaged in anti-corruption reform efforts in Ukraine.

4.1. Research design and case selection

Given the research question's focus on how Ukrainian anti-corruption actors understand and operationalise EU-promoted norms, a qualitative case study approach is particularly suited for capturing these perspectives. Here, the case study approach facilitates an in-depth exploration, from multiple perspectives, of the complexity and uniqueness of a specific real-life context.⁶⁴ The case study for this thesis is centred on anti-corruption reform within Ukraine's accession process, which enables a detailed investigation into the interaction between EU-promoted anti-corruption norms and domestic reform dynamics. Further, drawing on multiple sources of evidence provides insight into both how EU-promoted anti-corruption norms are articulated within key strategic documents and how they are

⁶² E. Ademmer, Laura Delcour and Kataryna Wolczuk, 'Beyond Geopolitics: Exploring the Impact of the EU and Russia in the "Contested Neighbourhood"', *Eurasian Geography and Economics* 54.1 (2016), 1-18, pp. 2.

⁶³ R. K. Yin, *Case Study Research: Design and Methods*, 4th edn (London: SAGE 2009), p. 18.

⁶⁴ H. Simons, 'Case Study Research: In-Depth Understanding in Context', in P. Leavy (ed.), *The Oxford Handbook of Qualitative Research*, 2nd edn, Oxford Handbooks, 2020, p. 681.

understood and operationalised by Ukrainian anti-corruption actors.⁶⁵ This research design is thus particularly suited to examining how EU-promoted anti-corruption norms acquire meaning within the domestic reform context beyond their formal articulation within strategic documents.

The selection of Ukraine as the case study for this thesis was informed by several considerations. As one of the most recent accession candidate countries, Ukraine represents a particularly relevant case through which to examine contemporary forms of EU conditionality, especially given the increasing prominence of anti-corruption reform. Ukraine also serves as a distinctive case study, as it has continued to pursue EU accession in the context of a full-scale military invasion. The Ukrainian context therefore provides an opportunity to examine how EU-promoted anti-corruption norms are understood and operationalised under conditions of extraordinary political and institutional pressure. Further, the single-case design enables detailed examination of these dynamics within their specific institutional and political context, thus allowing greater analytical depth than would be possible in a comparative study.

4.2. Data collection

For the document analysis, the selection of documents was shaped by the aim of establishing how EU-promoted anti-corruption norms have been articulated within key strategic documents. The purpose was for this to serve as a normative reference point for the subsequent analysis of the interview data. To ensure the use of authoritative sources, the documents were identified through EUR-Lex, the European Union's official database of legal and policy documents.⁶⁶ The selection criteria focused on strategic and conditionality-oriented documents that articulated EU expectations, priorities, and reform requirements concerning anti-corruption reform in Ukraine. Key documents selected for analysis included the EU-Ukraine Association Agreement, Visa Liberalisation Action Plan Reports, European Commission Enlargement Reports, accession benchmarks, and recent EU anti-corruption initiatives. The decision to begin the period of analysis with the 2014 EU-Ukraine

⁶⁵ R. K. Yin, *Case Study Research: Design and Methods*, 4th edn (London: SAGE 2009), p. 18.

⁶⁶ European Union, *EUR-Lex: Access to European Union Law* < <https://eur-lex.europa.eu/homepage.html> > accessed 26 April 2026.

Association Agreement reflected its significance as a milestone in EU-Ukraine relations. This also provided a logical basis for tracing the evolution of EU anti-corruption reform expectations from the Association Agreement through to the accession framework. Domestic implementation documents and highly technical materials were excluded from the analysis due to the focus on the EU's articulation of anti-corruption norms.

For the semi-structured interviews, participants were selected on the basis of their professional involvement in anti-corruption reform within Ukraine's EU accession context. All respondents were Ukrainian nationals, reflecting the study's focus on how domestic actors understand and operationalise EU-promoted anti-corruption norms. The interview sample consisted of representatives of civil society organisations, policy and legal reform initiatives, research institutions, and technical assistance projects engaged in anti-corruption reform. Initial access to respondents was facilitated through a "gatekeeper", namely a former anti-corruption policy expert with extensive professional experience in Ukraine, who assisted in identifying suitable interviewees.⁶⁷ Further respondents were identified through a public call for interviewees and direct contact with organisations engaged in anti-corruption reform in Ukraine. This was supplemented by snowball sampling, whereby respondents recommended additional interviewees with relevant expertise and professional experience.⁶⁸ In total, eleven interviews were conducted, however, one interview was excluded from the final analysis due to language-related limitations, resulting in a final sample of ten interviews. All interviews were conducted online, via Zoom, in English, and ranged in duration from approximately forty minutes to one and a half hours. Prior to each interview, respondents were provided with information regarding the study and informed consent was obtained. Interviews were audio-recorded, with permission from respondents, and subsequently transcribed manually by the author. To ensure anonymity, all respondents were assigned numerical identifiers (e.g. Respondent 1-10) and are referred to accordingly throughout the thesis.

To ensure data collection remained consistent and in line with the research objective, the interview guide was developed to explore how respondents understood and operationalised

⁶⁷ M. Hammersley and Paul Atkinson, *Ethnography: Principles in Practice* (4th edn, Routledge 2019) 49-50.

⁶⁸ A. Bryman, *Social Research Methods* (5th edn, Oxford University Press 2016) 415-16.

EU-promoted anti-corruption norms within the Ukrainian accession context.⁶⁹ The guide was organised around five thematic sections, focusing on respondents' professional experience, organisational approaches to anti-corruption reform, experiences with EU-driven reform and conditionality, interaction with international partners, and broader reflections on anti-corruption reform in Ukraine. Respondents were not asked directly about norms. Instead, questions focused on their experiences of anti-corruption reform, engagement with EU benchmarks, advocacy practices, and interactions with international partners. This approach was intended to capture respondents' own understandings and interpretations of EU-promoted anti-corruption norms without imposing normative categories through the interview process.

4.3. Data analysis

Once selected, the key EU strategic documents were analysed using a qualitative document analysis approach.⁷⁰ The analysis focused on reconstructing how EU-promoted anti-corruption norms were articulated through recurring reform expectations, conditionality requirements, institutional priorities, and implementation benchmarks. Particular attention was given to identifying patterns and continuities across strategic documents in order to trace the evolution of EU anti-corruption reform expectations from the Association Agreement through to the accession framework. Although the document analysis revealed how EU-promoted anti-corruption norms were articulated within key strategic documents, it could not by itself explain how these norms were understood and operationalised by domestic actors. This analysis therefore established a normative reference point for the subsequent investigation into how Ukrainian anti-corruption professionals interpreted and operationalised these norms within the domestic reform context.

The interview data was analysed and coded using a thematic analysis approach.⁷¹ Once manually transcribed, the interview transcripts were read repeatedly to facilitate familiarisation with the data and identify recurring patterns relevant to the research question. The initial coding framework was informed by both the research question and the thematic

⁶⁹ The full interview guide is provided in Annex I.

⁷⁰ G. A Bowen, 'Document Analysis as a Qualitative Research Method', *Qualitative Research Journal* 9.2 (2009), 27-38

⁷¹ V. Braun and Victoria Clarke, *Thematic Analysis: A Practical Guide* (SAGE Publications 2022) 6-9.

structure of the interview guide, resulting in five preliminary coding categories: “*conditionality_driver*”, “*implementation_gap*”, “*EU_as_leverage*”, “*co_production*”, and “*norm_translation*”. All interview transcripts were coded manually within Microsoft Word through the highlighting of relevant passages and the assignment of thematic labels corresponding to these coding categories. While the coding framework was primarily deductive, the analysis remained iterative, allowing coding categories to be refined in response to recurring patterns within the data.⁷² For example, the coding category “*co_production*” emerged as a prominent theme during the analysis, whereas “*norm_translation*” generated comparatively fewer relevant extracts than initially anticipated. Relevant extracts were subsequently organised into separate thematic documents according to coding category, with quotations attributed to anonymised respondents to facilitate comparison across interviews. This process enabled the identification and refinement of analytical themes, which informed the interpretation of the interview findings.

4.4. Ethical considerations

Given the politically sensitive nature of anti-corruption reform within Ukraine and the context of Russia’s full-scale invasion, particular attention was paid to safeguarding the confidentiality and anonymity of all respondents. Prior to participation, respondents were informed of the purpose of the study and their right to withdraw at any stage, and informed consent was obtained before each interview.⁷³ To protect respondents’ identities, organisational affiliations and other potentially identifiable details were omitted or generalised where necessary. Interview recordings and transcripts were stored securely throughout the research process, with access restricted solely to the author. These measures were intended to ensure that respondents could discuss anti-corruption reform openly while minimising potential risks associated with participation.

⁷² K. Proudfoot, ‘Inductive/Deductive Hybrid Thematic Analysis in Mixed Methods Research’, *Journal of Mixed Methods Research*, 17.3 (2023), 308-326.

⁷³ G. Ulrich, ‘Research ethics for human rights researchers’, in B.A. Andreassen H-O. Sano, and S. McInerney-Lankford (eds), *Research Methods in Human Rights: a handbook*, (Edward Elgar Publishing), pp. 206-207

4.5. Methodological limitations

While the methodological approach adopted was appropriate for answering the research question, several constraints should be acknowledged. Most notably, the interview sample was deliberately focused on reform-oriented actors, meaning that the perspectives of political actors and a broader range of EU representatives were not captured. These perspectives would have provided additional insight into alternative understandings of anti-corruption reform, as well as the political and institutional constraints affecting its implementation. In addition, all interviews were conducted in English, which inevitably influenced participant accessibility and the composition of the interview sample. As a result, respondents were generally drawn from internationally engaged professional backgrounds, potentially excluding perspectives from actors less engaged in international reform networks. Accordingly, the findings should be understood as providing in-depth insight into the perspectives of a specific group of anti-corruption professionals, rather than as representative of the wider anti-corruption reform community in Ukraine.⁷⁴

⁷⁴ N. Mays and Catherine Pope, 'Qualitative Research: Rigour and Qualitative Research', *BMJ* 311 (1995) 109-112, pp. 109.

5. Findings and analysis

5.1. EU strategic documents

This chapter analyses key EU strategic documents in order to understand how anti-corruption reform has been conceptualised and articulated within the context of Ukraine's EU accession. The purpose of this chapter is to provide a normative reference point which will inform the subsequent analysis of interview data. In doing so, the analysis focuses on strategic and conditionality-oriented EU documents, including the EU-Ukraine Association Agreement,⁷⁵ Visa Liberalisation Action Plan (VLAP) Reports,⁷⁶ Enlargement Reports (2023-2025),⁷⁷ Chapter 23 and 24 accession benchmarks,⁷⁸ and recent EU anti-corruption initiatives.⁷⁹ These documents were selected due to their significance in articulating EU anti-corruption norms, institutional reform expectations, and implementation requirements within the Ukrainian accession context. Domestic implementation documents and highly technical materials were omitted from the analysis due to the section's focus on EU strategic approaches to anti-corruption conditionality and reform. Structured thematically, the analysis reconstructs how EU strategic documents conceptualise and articulate anti-corruption reform through institutional transformation, benchmark-driven conditionality, substantive implementation, and the long-term continuity of reform within the accession process.

5.1.1 Institutionalising anti-corruption reform through EU conditionality

Across the analysed EU strategic documents, anti-corruption reform is consistently framed as a central component of Ukraine's EU accession trajectory. In particular, the documents conceptualise anti-corruption reform through the formal establishment of legislative, policy,

⁷⁵ Association Agreement between the European Union and its Member States, of the one part, and Ukraine, of the other part [2014] OJ L161/3.

⁷⁶ European Commission, *Sixth Progress Report on the Implementation by Ukraine of the Action Plan on Visa Liberalisation* COM (2015) 905 final.

⁷⁷ European Commission, *Ukraine 2023 Report* SWD (2023) 699 final; European Commission, *Ukraine 2024 Report* SWD (2024) 699 final; European Commission, *Ukraine 2025 Report* SWD (2025) 759 final.

⁷⁸ European Commission, *Chapter 23 ("Judiciary and Fundamental Rights") and Chapter 24 ("Justice, Freedom and Security") Accession Benchmarks for Ukraine* (unofficial document, 2026).

⁷⁹ European Commission, *Proposal for a Directive on Combatting Corruption* COM (2023) 234 final.

and institutional frameworks designed to align domestic governance structures with EU standards. This institutional approach to anti-corruption reform is particularly evident within the VLAP Reports, which foreground the creation and operationalisation of specialised anti-corruption institutions as a key component of reform progress.⁸⁰ As the *Sixth VLAP Progress Report* states, “the specialised anti-corruption prosecution office should become operational as a matter of top priority; it is an indispensable component of an effective and independent institutional framework for combatting high-level corruption”.⁸¹ This positions specialised anti-corruption institutions and institutional independence as central components of EU anti-corruption reform expectations, reflecting how anti-corruption is articulated through institutional conditionality. Further, the *EU-Ukraine Association Agreement* embeds anti-corruption reform within the normative foundations of EU-Ukraine relations, positioning institutional reform as integral to political association with the European Union. In this regard, the Agreement calls for a “comprehensive anti-corruption reform process with tangible results in the prevention and fight against corruption with clear responsibilities allocated to specialized bodies”.⁸² The requirement for “tangible results”, crucially, extends the institutional framing of anti-corruption reform beyond the formal establishment of specialised bodies towards measurable reform outcomes.

Alongside this, the EU strategic documents conceptualise anti-corruption reform within wider rule-of-law and governance frameworks central to Ukraine’s EU accession process. This framing thereby positions anti-corruption reform as extending beyond institutional creation and as a foundational norm of rule-of-law and democratic governance. In this regard, the European Commission outlines in its 2022 *Opinion on Ukraine’s Application for Membership of the European Union* that, “this need for reforms arose against the background of insufficient independence of the judiciary from the executive and legislative branches, low accountability, [and] high levels of corruption”.⁸³ This conceptualisation of anti-corruption

⁸⁰ The Visa Liberalisation Action Plan (VLAP) was introduced by the European Commission in 2010 as a conditionality framework linking visa liberalisation to reforms concerning rule of law, governance, anti-corruption, border management, and institutional capacity.

⁸¹ European Commission, *Sixth Progress Report on the Implementation by Ukraine of the Action Plan on Visa Liberalisation*, COM (2015) 905 final, p. 7.

⁸² EU-Ukraine Association Council, *EU-Ukraine Association Agenda to Prepare and Facilitate the Implementation of the Association Agreement* (16 March 2015) p. 14.

⁸³ European Commission, *Commission Opinion on Ukraine’s Application for Membership of the European Union* COM (2022) 407 final, 17 June 2022, p. 8.

reform as intrinsically linked to rule-of-law governance reflects how strategic documents construct anti-corruption reform as foundational to institutional convergence within the accession framework. Together, these findings reveal how anti-corruption reform is embedded within the normative foundations of Ukraine's EU accession process.

5.1.2. Operationalising anti-corruption reform through EU conditionality

Within EU strategic documents, anti-corruption reform is articulated through benchmark-driven conditionality, continuous monitoring, and measurable implementation expectations, reflecting how reform progress is understood as achievable through the formal fulfilment of accession benchmarks. This framing of anti-corruption reform places particular emphasis on demonstrable progress, effective implementation, and continued alignment with EU reform expectations. In this regard, the 2024 *Enlargement Report* states, “Ukraine has made some progress, notably by strengthening its anti-corruption institutional framework and the gradual building of a track record in investigating, prosecuting and adjudicating high-level corruption cases”.⁸⁴ The foregrounding of Ukraine's “track record” demonstrates how EU documents conceptualise anti-corruption reform as an ongoing and measurable process, evaluated through continued reform implementation. Further, within EU strategic documents, anti-corruption reform is framed as a process involving sustained institutional commitment and alignment with conditionality, reflecting how reform is understood as a continuous process of implementation within the accession framework. For instance, the 2025 *Enlargement Report* states that recent “developments cast doubts on Ukraine's commitment to its anti-corruption agenda”, adding that “Ukraine should advance its anti-corruption framework and prevent any backsliding on notable reform achievements”.⁸⁵ This indicates that anti-corruption reform is understood as a long-term and continuously monitored process, in which, despite substantial domestic implementation, reforms may remain susceptible to political backsliding.

Moreover, an integral aspect of how EU anti-corruption conditionality is operationalised within the accession context is through codified benchmarks, which translate anti-corruption reform expectations into specific and measurable implementation requirements. In

⁸⁴ European Commission, *Ukraine 2024 Report* SWD (2024) 699 final, p. 6.

⁸⁵ European Commission, *Ukraine 2025 Report* SWD (2025) 759 final, p. 6.

particular, the Chapter 23 (*“Judiciary and Fundamental Rights”*)⁸⁶ and Chapter 24 (*“Justice, Freedom, and Security”*)⁸⁷ accession benchmarks articulate anti-corruption reform through detailed implementation criteria, thereby structuring reform progress into codified and measurable obligations within Ukraine’s EU accession process. The Chapter 23 benchmarks call on Ukraine to ensure “advanced, sustained and continuously implement the anti-corruption legal and strategic frameworks, including significant gradual alignment with the EU *acquis*...with effective co-ordination, budgeting, monitoring and evaluation”.⁸⁸ This framing of anti-corruption reform as a codified and measurable process highlights how EU documents conceptualise reform progress through formalised criteria, continuous assessment, and alignment with accession conditionality. Further, the Chapter 24 benchmarks call on Ukraine to “demonstrate a solid increase in the investigations, prosecutions, and convictions...demonstrated by solid data as encoded in the e-platform”.⁸⁹ This frames anti-corruption reform in terms of technocratic and quantifiable indicators of institutional performance and implementation outcomes. Together, these benchmarks reveal how anti-corruption reform is operationalised within EU documents through formalised implementation criteria, measurable institutional performance, and continuous alignment with accession conditionality.

5.1.3. The ongoing articulation of EU anti-corruption norms

Importantly, within the recent EU anti-corruption directives, anti-corruption norms are articulated through a continuously developing framework, reflecting how the EU itself continues to redefine and expand anti-corruption expectations beyond fixed accession conditionality. This underscores how EU anti-corruption reform expectations are adaptable and subject to ongoing transformation within the Ukrainian accession process. In this regard, the 2023 *Proposal for a Directive on Combatting Corruption* states, “the existing legal framework

⁸⁶ European Commission, *Chapter 23 Accession Benchmarks for Ukraine* (unofficial document circulated following the explanatory screening process, 2026) < <https://www.eurointegration.com.ua/files/5/2/5256f03-23-benchmarks-eng.pdf> > accessed 14 April 2026.

⁸⁷ European Commission, *Chapter 24 Accession Benchmarks for Ukraine* (unofficial document circulated following the explanatory screening process, 2026) < <https://www.eurointegration.com.ua/files/7/c/7c47d49-24-benchmarks-eng.pdf> > accessed 14 April 2026.

⁸⁸ European Commission, *Chapter 23 Accession Benchmarks for Ukraine*, p. 4.

⁸⁹ European Commission, *Chapter 24 Accession Benchmarks for Ukraine*, p. 1.

on combatting corruption needs to be updated to take into account the evolution of corruption threats”.⁹⁰ This demonstrates how EU anti-corruption norms are shaped by an ongoing process of adaptation and redefinition in response to evolving corruption risks. Moreover, the 2026 *Directive on Combatting Corruption* states that, “diverse manifestations of corruption necessitate a coordinated and harmonised approach among Member States to address its root causes and consequences effectively”.⁹¹ This reflects how, at the EU-level, the scope and definition of corruption continue to be refined, revealing a continuously developing framework through which EU anti-corruption norms are articulated. The 2023 *Joint Communication on the Fight Against Corruption* also acknowledges that, “corruption activities are constantly evolving and adapting to new opportunities, and patterns differ across Member States”.⁹² This foregrounds that EU anti-corruption norms are not articulated as fixed standards, but are instead subject to an ongoing process of reformulation in response to evolving understandings and manifestations of corruption.

This analysis of EU strategic documents has revealed how anti-corruption norms have been conceptualised and articulated through conditionality and reform expectations within Ukraine’s accession process. However, it provides limited insight into the dynamics through which these EU norms are understood and operationalised to advance domestic anti-corruption reform within the Ukrainian context. The following chapter therefore shifts the focus of the analysis to foreground the perspectives and experiences of Ukrainian anti-corruption actors, examining how EU anti-corruption norms are interpreted, negotiated, and operationalised within the domestic reform context.

⁹⁰ European Commission, *Proposal for a Directive on Combatting Corruption* COM (2023) 234 final, p. 1.

⁹¹ European Parliament and Council, *Directive on Combatting Corruption* (2026), p. 2.

⁹² European Commission, *Joint Communication on the Fight against Corruption* JOIN (2023) 12 final, p.7.

5.2. Interviews

This chapter presents five themes that emerged from the interview data, with each theme representing a distinct aspect of how EU-driven anti-corruption norms are understood and operationalised by Ukrainian anti-corruption actors. This chapter therefore draws on qualitative data collected from eleven semi-structured interviews with experts on anti-corruption reform in Ukraine. For the interviews, each respondent had substantial professional experience working in the field of anti-corruption in Ukraine, ranging from five to fourteen years. The respondents represented a diverse range of domestic anti-corruption actors, including civil society organisations (CSOs), think tanks, media and analytical organisations, and technical assistance projects. Given the sensitive nature of anti-corruption reform processes, all interviewees have been anonymised to ensure confidentiality, with each respondent assigned a numerical identifier (e.g. “Respondent 1”) alongside a brief descriptor of their institutional role (e.g. CSO representative). The five themes were identified through an inductive/deductive hybrid thematic analysis, with initial codes derived from the interview guide and subsequently refined based on patterns emerging from the data.⁹³ Rather than evaluating EU anti-corruption norm transfer through formal legal adoption alone, this chapter follows an actor-oriented approach to examine how the implementation of a reform ‘is done’ in practice, or how it is obstructed, ignored, or adopted to local conditions.⁹⁴ Throughout the analysis, quotes from respondents are used to foreground the perspectives of anti-corruption actors in Ukraine, providing insight into how EU-driven norms are interpreted and operationalised within the domestic reform context.

The five themes identified are: EU conditionality as a driver of anti-corruption reform; EU norms as leverage in domestic anti-corruption advocacy; the translation of EU anti-corruption norms into domestic practices; the co-production of anti-corruption norms; and the implementation gap between formal compliance and substantive reform. Within these five themes, a number of distinct subthemes can also be identified.

⁹³ K. Proudfoot, ‘Inductive/Deductive Hybrid Thematic Analysis in Mixed Methods Research’, *Journal of Mixed Methods Research*, 17.3 (2023), 308-326.

⁹⁴ M. Králiková, ‘Importing EU Norms: The Case of Anti-Corruption Reform in Ukraine’, *Journal of European Integration*, 44.2 (2022), 245-260, p. 246.

5.2.1. EU conditionality as a driver of anti-corruption reform

One of the key themes that emerged from the interview data was EU conditionality as driver of domestic anti-corruption reform. Interview respondents consistently described EU conditionality as driving anti-corruption reform processes through the imposition of benchmarks, formal obligations, and external pressure, particularly in contexts in which domestic political will is limited. As Respondent 9 (technical assistance expert) noted, “many things won’t happen without the conditionality from international partners, including from the EU”.⁹⁵ Within this theme, EU conditionality operates as a driver of anti-corruption reform in several distinct ways, as reflected in the patterns identified across the interview data.

External leverage in the absence of domestic political will

Among respondents, there was a clear distinction between genuine domestic political will to pursue anti-corruption reform, and externally driven compliance with EU conditionality obligations. This reveals how anti-corruption reform in Ukraine is often driven through external pressure rather than sustained internal political commitment. Respondent 1 (anti-corruption expert) noted that “having political will and having a lot of pressure from the EU partners are two very different things”.⁹⁶ Here, Respondent 1’s distinction between political will and external pressure emphasises that the implementation of anti-corruption reform cannot be taken as evidence of genuine domestic political commitment, but may instead reflect compliance driven by EU conditionality. As Respondent 1 further reflected, “would you say that it’s willing if you’re dragged by your skin somewhere? I wouldn’t call it will, I would call it reluctant compliance”.⁹⁷ Here, the characterisation of anti-corruption reform implementation as “reluctant compliance” indicates that while EU conditionality may produce formal compliance in the absence of political will, it does not reflect genuine domestic ownership of reform processes. This dynamic is further reinforced by data suggesting that political actors may not actively drive anti-corruption reform. As Respondent

⁹⁵ Interview with Respondent 9 (technical assistance expert), conducted by the author via Zoom, March 2026.

⁹⁶ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

⁹⁷ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

5 (analytical organisation representative) noted, “the partner in this is not the government of Ukraine...they are never willing to implement real reform”.⁹⁸ This underscores that anti-corruption reform is not driven by domestic actors themselves, but instead is implemented in the absence of genuine political will, thereby positioning EU conditionality as the primary driver of reform processes.

In this context, EU conditionality emerges as a key driver of anti-corruption reform, operating through incentive structures that shape the trajectory, and speed of reform processes. Respondents consistently emphasised that EU conditionality incentivises anti-corruption reform implementation through its association with Ukraine’s EU accession. Respondent 2 (CSO representative) noted that “European integration is a simple goal that [the] majority of citizens comprehend...everything tied to that is a driver of reform”.⁹⁹ This demonstrates how the prospect of EU accession functions as an incentive for anti-corruption reform by linking domestic reform efforts to the broader “goal” of Ukraine’s European integration. This is further reflected in how anti-corruption reform is understood as directly connected to Ukraine’s European integration, as Respondent 9 (technical assistance expert) noted, “without anti-corruption reform, there won’t be EU accession”.¹⁰⁰ This demonstrates how progress towards EU accession is contingent upon the implementation of EU-driven anti-corruption reform, underscoring the central role of conditionality in incentivising reform compliance.

Beyond incentives linked to EU accession, the interview data demonstrates how conditionality operates as a driver of anti-corruption reform through financial leverage. For instance, by linking external funding to reform implementation. As Respondent 9 (anti-corruption research expert) noted, in the context of the full-scale invasion, “Ukraine cannot live without the Western money and the financial aid”.¹⁰¹ Respondent 9’s observation indicates that reliance on Western macro-financial assistance shapes how EU conditionality

⁹⁸ Interview with Respondent 5 (analytical organisation representative), conducted by the author via Zoom, March 2026.

⁹⁹ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

¹⁰⁰ Interview with Respondent 9 (technical assistance expert), conducted by the author via Zoom, March 2026.

¹⁰¹ Interview with Respondent 10 (anti-corruption research expert), conducted by the author via Zoom, March 2026.

operates, through creating financial incentives for Ukraine to comply with anti-corruption reform requirements. This dynamic is further reflected in the structural design of EU financial instruments, such as the Ukraine Facility, which embeds conditionality within their funding requirements. Respondent 3 (policy and analytical organisation representative) highlighted that “the Ukraine Facility was developed together with the Ukrainian government...they [EU] made it quite simple...they need to implement [reform]...it’s a good thing that this money-for-reforms arrangement exists... they immediately see the effect of them not implementing anything”.¹⁰² This illustrates how financial conditionality is operationalised through structured funding arrangements, in which access to macro-financial assistance is directly tied to reform implementation, and non-compliance carries immediate material consequences. Respondent 2 (CSO representative) described the macro-financial assistance aspect of the Ukraine Facility as “effective, even sometimes more so [than incentives linked to EU accession] because Ukraine needs money desperately”.¹⁰³ This indicates that financial conditionality operates as a more immediate driver of anti-corruption reform than incentives linked to EU accession. Likewise, Respondent 9 (technical assistance expert) noted that, “it is crucially important to have this conditionality stemming from macro-financial assistance of the EU”.¹⁰⁴ This highlights how macro-financial assistance from the EU serves as a central mechanism in which conditionality drives anti-corruption reform, particularly when domestic political will is absent.

The interview data reveals how EU conditionality, in the absence of domestic political will, operates as a driver of anti-corruption reform through formal benchmarks and obligations that structure and facilitate reform processes. This dynamic is reflected in how respondents consistently described EU conditionality as operating through clearly defined anti-corruption benchmarks and concrete reform requirements. Respondent 2 (CSO representative) noted that, as a result of a more formalised and structured approach to EU integration, Ukraine now has “more specific requirements, more specific benchmarks to go by”.¹⁰⁵ This demonstrates how EU conditionality, within the accession process, has reshaped anti-

¹⁰² Interview with Respondent 3 (policy and analytical organisation representative), conducted by the author via Zoom, March 2026.

¹⁰³ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

¹⁰⁴ Interview with Respondent 9 (technical assistance expert), conducted by the author via Zoom, March 2026.

¹⁰⁵ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

corruption reform in Ukraine into a more structured and benchmark-driven process. Respondent 4 (CSO representative) noted that “when you have a benchmark...the Ukrainian government is obliged to do so [implement reform] so you do not have to preach over and over again...because it is already written, people are responsible”.¹⁰⁶ This demonstrates how EU conditionality operates as a driver of anti-corruption reform through providing clearly defined and measurable obligations that formulate reform processes and assign responsibility for implementation. Respondent 9 (technical assistance expert) noted that, “when you don’t have a willingness to do anything about the fight of corruption domestically, EU benchmarks is the main incentive to move forward”.¹⁰⁷ Thus revealing how, in the absence of political will, EU benchmarks provide a formulated and measurable approach to anti-corruption reform.

Domestic legitimisation of EU conditionality

While EU conditionality has thus far emerged as a driver of anti-corruption reform through providing external leverage in the absence of political will, the data reveals how the effectiveness of conditionality is further strengthened by its domestic legitimisation from the Ukrainian public. Among respondents, there was a consensus that public support for Ukraine’s EU accession, often associated with expectations of improved governance and reduced corruption, reinforces the effectiveness of EU conditionality by legitimising it as an external driver of reform. Respondent 3 (policy and analytical organisation representative) noted that, “strong public support for joining the EU is driving a lot of these reforms”.¹⁰⁸ This indicates that public support for EU accession situates anti-corruption reform within broader societal expectations regarding Ukraine’s future, thereby strengthening the legitimacy and influence of EU conditionality within reform processes.

This dynamic is further evident in how respondents described the relationship between EU accession and expectations of improved governance and reduced corruption. Respondent 4

¹⁰⁶ Interview with Respondent 4 (CSO representative), conducted by the author via Zoom, March 2026.

¹⁰⁷ Interview with Respondent 9 (technical assistance expert), conducted by the author via Zoom, March 2026.

¹⁰⁸ Interview with Respondent 3 (policy and analytical organisation representative), conducted by the author via Zoom, March 2026.

(CSO representative) noted that, “there is a popular demand in Ukraine for a better, functional government...that is not constantly facing corruption scandals, Ukrainians tend to think that those two are interconnected...if you’re in the EU you have less corruption and a better working government”.¹⁰⁹ This highlights how, for the Ukrainian public, accession is understood not only as a political objective, but as a transformative mechanism for achieving a more transparent and functional government, with less instances of corruption. Thereby, through its association with improved governance, EU accession becomes linked to broader domestic expectations of reform, reinforcing the legitimacy of EU conditionality. In this regard, Respondent 9 (technical assistance expert) noted that, “it is almost impossible...to reject necessary reforms on the path to the European Union”.¹¹⁰ This demonstrates how domestic support for accession not only legitimises EU conditionality as a driver of anti-corruption reform, but also how it limits the scope for non-compliance from political actors, by creating conditions in which it becomes “almost impossible” for them to reject or delay reform measures.

Indeed, several respondents identified how strong domestic support for EU accession often results in sustained pressure on political actors to implement anti-corruption reforms deemed as necessary for Ukraine’s accession path. As Respondent 8 (CSO representative) noted, “part of the national vision is that we have to join the EU...and we are ready to dismiss the politicians who prevent Ukraine from doing so”.¹¹¹ This demonstrates that, in the context of the full-scale invasion, there is still a strong domestic willingness to hold political actors who are viewed as opposing Ukraine’s EU accession trajectory to account. Through associating EU accession with the “national vision”, this reveals how accession becomes embedded within domestic expectations for Ukraine’s future, which in turn, legitimises EU accession as a salient political issue. As Respondent 9 (technical assistance expert) noted, “any politician can be successful only if he or she is pro-European”.¹¹² This demonstrates the extent to which support for EU accession has become politically embedded, with pro-European positioning increasingly functioning as a prerequisite for political legitimacy. Respondent 7

¹⁰⁹ Interview with Respondent 4 (CSO representative), conducted by the author via Zoom, March 2026.

¹¹⁰ Interview with Respondent 9 (technical assistance expert), conducted by the author via Zoom, March 2026.

¹¹¹ Interview with Respondent 8 (CSO representative), conducted by the author via Zoom, March 2026.

¹¹² Interview with Respondent 9 (technical assistance expert), conducted by the author via Zoom, March 2026.

(policy organisation representative) similarly noted, “politicians need to fulfil the obligation and will from society and citizens to be part of the EU”.¹¹³ This highlights how domestic legitimisation generates pressure for political actors to deliver on their “obligation” to implement the necessary anti-corruption reforms for Ukraine’s accession.

Beyond general societal support for EU accession, several respondents also highlighted how, in the context of the full-scale invasion, accession is widely understood by the public as being interconnected with Ukraine’s defence of its sovereignty. Respondent 7 (policy organisation representative) noted that, “citizens made this choice to be part of the EU, and they are paying in blood for that choice, that’s why for Ukrainian citizens...the EU negotiation process is so important...because people are fighting for it”.¹¹⁴ Here, it is interesting to observe how this respondent frames EU accession as an active choice made by Ukrainian citizens themselves, which in the context of the full-scale invasion, is being paid for “in blood” in the form of military and civilian wartime casualties. This framing of EU accession demonstrates how conditionality derives its legitimacy from a strong societal commitment to Ukraine’s accession. Likewise, Respondent 2 (CSO representative) described Ukraine’s EU accession as “something that was promised politically to Ukrainians”, and further as “the point why people keep fighting in the war”.¹¹⁵ This framing indicates that Ukraine’s EU accession is understood by the public as an obligation from the EU, which, in the context of the full-scale invasion, provides motivation for Ukrainians to continue fighting. Drawing on this public understanding of EU accession as interconnected with resistance to the full-scale invasion; this indicates that domestic legitimisation facilitates greater effectiveness of conditionality as a driver of anti-corruption reform by limiting the scope for political resistance..

Taken together, these insights demonstrate how EU conditionality is not only externally imposed but is internalised within domestic political expectations and wartime narratives for Ukraine’s future, thereby reinforcing its effectiveness as a driver of anti-corruption reform.

¹¹³ Interview with Respondent 7 (policy organisation representative), conducted by the author via Zoom, March 2026.

¹¹⁴ Interview with Respondent 6 (policy organisation representative), conducted by the author via Zoom, March 2026.

¹¹⁵ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

Limitations of EU conditionality as a driver of anti-corruption reform

Although EU conditionality has emerged as a key driver of anti-corruption reform, several respondents highlighted how its effectiveness is constrained by factors such as selective enforcement, political trade-offs, and Ukraine's strategic leverage within accession negotiations. First, in regard to the selective enforcement of EU conditionality, a number of respondents identified how, at the EU level, decisions to enforce conditionality are largely shaped by political trade-offs. Respondent 1 (anti-corruption expert) noted that, "certain things will be downplayed if the potential weight of maintaining a good relationship is at stake".¹¹⁶ This statement demonstrates that the EU may be willing to soften the enforcement of conditionality regarding politically sensitive reforms in order to avoid jeopardising its political relationship with Ukraine. Therefore, this indicates that the enforcement of conditionality is non-uniform and largely shaped by political considerations. This dynamic is further reflected in how respondents described the EU's approach to balancing its geopolitical commitment to supporting Ukraine with the enforcement of conditionality. Respondent 3 (policy and analytical organisation) noted that for the EU, "not helping Ukraine is not an option...so it's this balance where you have leverage, but you don't want to be too strict".¹¹⁷ This reflects the limitations of EU conditionality as a driver of anti-corruption reform, as the EU balances strict enforcement of conditionality with maintaining its political relationship with Ukraine, thus resulting in non-uniform and politically contingent enforcement.

In addition to EU conditionality being selectively enforced, several respondents highlighted how, within the context of the full-scale invasion, Ukraine is able to exercise considerable strategic leverage in its relationship with the EU. In this regard, Respondent 1 noted "Ukraine is protecting the EU from the onslaught...the moment the temperature of the discussion reaches a certain point, the argument of the barbarians are at the door...is an argument that will defend everything".¹¹⁸ This framing of the full-scale invasion as a fundamental threat to European security, in which Ukraine is defending the EU, positions Ukraine as indispensable

¹¹⁶ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

¹¹⁷ Interview with Respondent 3 (policy and analytical organisation), conducted by the author via Zoom, March 2026.

¹¹⁸ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

to the defence of Europe. Within this framework, this indicates that Ukraine is capable of shaping how EU conditionality is enforced through exerting political leverage derived from its role in defending against the full-scale invasion. This dynamic is further reflected in how respondents described the frequency in which Ukraine strategically leverages its security role in the full-scale invasion within EU accession negotiations. As Respondent 2 (CSO representative) noted, “we use it whenever we can, it’s something we use for our benefit”, and further “the EU give a lot of leeway due to that”.¹¹⁹ This indicates that Ukraine often leverages its role in European security during negotiations with the EU, which may result in the EU making concessions in how conditionality is enforced. This leveraging dynamic within the EU-Ukraine negotiation framework may limit the scope for strict enforcement of conditionality, thus reducing its effectiveness as a driver of anti-corruption reform.

Beyond selective enforcement at the EU level, respondents highlighted how, within the domestic context, institutional dynamics further constrain the effective implementation of conditionality. In this regard, several respondents noted that Ukrainian political actors are often unwilling to implement the necessary anti-corruption reforms required under EU conditionality. Respondent 8 (CSO representative) noted “parliament has a conflict with the government...[who are]...not ready to adopt what the government is promising to European partners”.¹²⁰ This dynamic between the Ukrainian government and parliament indicates that EU conditionality may be constrained by internal conflict, thereby limiting its effectiveness as a driver of anti-corruption reform. This is further reflected in how respondents described the political disincentives associated with implementing anti-corruption reform. As Respondent 4 (CSO representative) noted, “MPs are afraid of being targeted by the anti-corruption bodies and institutions”.¹²¹ This suggests that political actors may resist the implementation of anti-corruption reform in order to preserve their self-interest and avoid exposure by anti-corruption institutions.

¹¹⁹ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

¹²⁰ Interview with Respondent 8 (CSO representative), conducted by the author via Zoom, March 2026.

¹²¹ Interview with Respondent 4 (CSO representative), conducted by the author via Zoon, March 2026.

5.2.2. EU norms as leverage in domestic anti-corruption advocacy

Another key theme that emerged from the interview data was the use of EU norms as a source of strategic leverage by domestic anti-corruption actors within Ukraine. While EU conditionality operates as an external driver of reform, respondents also highlighted how EU norms are strategically operationalised by Ukrainian civil society actors, as advocacy tools for driving anti-corruption reform at the domestic level. In particular, respondents described how EU norms, in the form of benchmarks, provide civil society actors with concrete tools to advocate for reform domestically, as well as to exert political pressure through multi-level advocacy dynamics involving both domestic and international actors.

EU benchmarks as tools for domestic advocacy

Within the data, there was a consensus among respondents that EU anti-corruption benchmarks provide Ukrainian civil society actors with clearly defined and measurable tools for their advocacy. In this regard, EU norms are operationalised as leverage in domestic anti-corruption advocacy through their articulation as specific and measurable benchmarks. This is reflected in how respondents underscored the importance of specificity for making EU benchmarks useful for domestic advocacy. As Respondent 1 (anti-corruption expert) noted, “whether more details or more precise formula for the recommendations and conditionality are helpful for CSOs to advocate, absolutely, because they can latch onto something”.¹²² This highlights how the specificity of EU benchmarks enables civil society actors to anchor their anti-corruption advocacy efforts in clearly defined external EU standards, thereby strengthening their capacity to formulate effective domestic reform demands. This dynamic was further evident in how respondents described how clearly formulated recommendations and defined timelines shape EU benchmarks into effective tools for anti-corruption advocacy. As Respondent 2 (CSO representative) noted, “it is very useful to have specific deadlines, specifically formed recommendations, the clearer the recommendations and benchmarks, the better”.¹²³ These insights demonstrate how the effectiveness of EU

¹²² Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

¹²³ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

benchmarks as domestic anti-corruption advocacy tools is tied to the clarity and measurability of reform objectives. These insights indicate that, when EU accession benchmarks are formulated in a specific and measurable manner, this enables civil society actors to leverage them to advance domestic anti-corruption reform.

In addition to EU accession benchmarks serving as measurable tools for domestic anti-corruption advocacy, respondents also highlighted how benchmarks shape the strategic priorities and direction of civil society advocacy efforts. This is reflected in how domestic civil society actors align their strategies for anti-corruption advocacy with EU-defined reform priorities. As Respondent 2 (CSO representative) noted, “we have to tie our advocacy efforts to what the European Union is prioritising”.¹²⁴ This suggests that EU benchmarks function as an agenda-setting mechanism within domestic anti-corruption advocacy, shaping which reforms civil society prioritise. This dynamic is further evident in how civil society actors position their anti-corruption advocacy in relation to EU priorities, as Respondent 10 (anti-corruption research expert) noted, “you have an additional argument saying that this will help us get to the EU accession”.¹²⁵ This indicates that benchmarks influence not only which reforms are prioritised, but also how civil society actors formulate their anti-corruption advocacy, by complementing domestic arguments for reform with references to EU accession. Moreover, within this context, several respondents outlined that reliance on domestic argumentation alone is often insufficient for advancing domestic anti-corruption reform. As Respondent 10 further noted, “just by advocating for it internally, with just the local ownership, civil society understands that it’s actually not quite possible”.¹²⁶ This demonstrates that EU benchmarks shape how domestic anti-corruption advocacy is conducted due to the necessity to incorporate EU-related arguments alongside domestic reform claims.

Alongside this, the data reveals how EU benchmarks strengthen the effectiveness of domestic anti-corruption advocacy by providing civil society actors with an additional source of legitimacy. Several respondents highlighted that, in the absence of EU benchmarks,

¹²⁴ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

¹²⁵ Interview with Respondent 10 (anti-corruption research expert), conducted by the author via Zoom, March 2026.

¹²⁶ Interview with Respondent 10 (anti-corruption research expert), conducted by the author via Zoom, March 2026.

domestic anti-corruption advocacy is more easily dismissed by political actors as lacking feasibility. As Respondent 5 (analytical organisation representative) noted, “we need EU benchmarks because when we don’t have support from our international partners, it would be easier for the government to say that it’s impossible to do what we want to achieve and it’s unprofessional”.¹²⁷ This demonstrates how EU benchmarks provide additional legitimacy to domestic anti-corruption advocacy by enabling civil society actors to anchor their reform demands in externally validated standards derived from EU norms. This is further reflected in how respondents described EU benchmarks as a decisive basis for advancing domestic anti-corruption reform. As Respondent 5 further noted “we always say to the parliament that it’s for EU integration, it’s the only justified argument that is left for us”.¹²⁸ This indicates that benchmarks are central to domestic anti-corruption advocacy, with EU-accession framing having displaced domestically grounded arguments as the most credible way to advance reform. Taken together, these insights reveal how EU benchmarks strengthen the effectiveness of domestic anti-corruption advocacy by providing additional legitimacy and an authoritative basis for civil society actors to advance reform.

EU norms as instruments for multi-level advocacy (“*sandwich model*”)

Having demonstrated that EU norms, when channelled through accession benchmarks, provide civil society actors with tools for advancing domestic anti-corruption reform, the data also reveals how these norms are leveraged within a multi-level advocacy framework to generate coordinated pressure on political actors. This framework was referred to by respondents as the “sandwich model” and was described as an advocacy dynamic in which bottom-up pressure from civil society is combined with top-down pressure from international partners to drive domestic anti-corruption reform. The data reveals how, within this “sandwich model”, EU norms are situated at the centre of this framework, as they function as a shared source of leverage through which both civil society actors and international partners exert pressure on domestic political actors. Indeed, as Respondent 10 (anti-corruption research expert) noted, the *modus operandi* for Ukrainian civil society

¹²⁷ Interview with Respondent 5 (analytical organisation representative), conducted by the author via Zoom, March 2026.

¹²⁸ Interview with Respondent 5 (analytical organisation representative), conducted by the author via Zoom, March 2026.

organisations is a “so-called sandwich effect within the advocacy, creating pressure from the bottom, and the international partners having the pressure from above”.¹²⁹ This highlights how anti-corruption advocacy is primarily conducted through a coordinated, multi-level “sandwich model” involving both domestic and international actors. Respondents, however, underscored that the effectiveness of the “sandwich model” is dependent upon mutual efforts between domestic civil society and international partners. As Respondent 6 (policy organisation representative) noted, “donors without civil society would not have achieved what has been achieved, and civil society without the leverage of donors cannot be a durable tool”.¹³⁰ This illustrates how domestic anti-corruption advocacy is mutually enforced by coordination with international partners, with neither level sufficient on its own to generate sustained reform.

The data reveals how, within the “sandwich model”, Ukrainian civil society actors actively engage with international partners to operationalise and channel this multi-level leverage to advance domestic anti-corruption reform. In particular, respondents described the “sandwich model” as involving strategic coordination with EU partners to shape domestic advocacy efforts. As Respondent 6 noted, “the drivers of anti-corruption reform are always the same, and the recipe is very simple: the push from civil society advocacy, then a good leverage generated by international donors”.¹³¹ This reveals how, within the “sandwich model”, civil society actors actively align their advocacy with EU-derived leverage in order to create a replicable formula for advancing domestic anti-corruption reform. This strategic coordination with EU partners is further evident in how civil society actors actively operationalise this framework within their domestic advocacy practices. As Respondent 5 (analytical organisation) noted, “we have good ties with international partners, EU, embassies of G7, and we communicate with them to put the necessary reforms into the requirements”.¹³² This demonstrates how civil society actors, through drawing on established relationships with international partners, are able to channel EU-derived leverage into their

¹²⁹ Interview with Respondent 10 (anti-corruption research expert), conducted by the author via Zoom, March 2026.

¹³⁰ Interview with Respondent 6 (policy organisation representative), conducted by the author via Zoom, March 2026.

¹³¹ Interview with Respondent 6 (policy organisation representative), conducted by the author via Zoom, March 2026.

¹³² Interview with Respondent 5 (analytical organisation representative), conducted by the author via Zoom, March 2026.

efforts to advance domestic anti-corruption reform. Thereby, this facilitates bottom-up pressure on political actors through externally anchored anti-corruption reform requirements.

Beyond this structured coordination, the data further reveals how, within the “sandwich model”, civil society actors strategically operationalise support from EU partners as leverage to respond to specific domestic anti-corruption reform challenges. Respondents described how this process is proactive, and involves civil society organisations directing the attention of international partners towards specific anti-corruption reforms that are at risk of being undermined by political actors. As Respondent 8 (CSO representative) noted, “if we see a huge risk of some draft law, we communicate proactively...we see that European partners can help to stop it, prevent it, or change it, we are using this channel and it’s really helpful”.¹³³ This highlights how civil society actors not only escalate reform risks to international partners, but also strategically utilise these channels to strengthen domestic anti-corruption advocacy efforts through targeted external support. The data reveals how, through using these channels, civil society actors are able to effectively leverage support from EU partners to generate concrete reform outcomes. As Respondent 8 further noted, in regard to a draft law perceived as problematic, “we mentioned this to the EU commission, we had close cooperation and communication, discussing the risk we see in the document, and they helped to prevent its adoption”.¹³⁴ This demonstrates how civil society actors actively utilise EU-derived leverage within the “sandwich model” to directly shape reform outcomes and prevent anti-corruption backsliding.

Taken together, these insights reveal how EU norms function as a source of leverage within the “sandwich model”, enabling civil society actors to coordinate with international partners in order to both strengthen their domestic advocacy, and directly shape anti-corruption reform outcomes.

¹³³ Interview with Respondent 8 (CSO representative), conducted by the author via Zoom, March 2026.

¹³⁴ Interview with Respondent 8 (CSO representative), conducted by the author via Zoom, March 2026.

EU norms as leverage, in practice: the NABU/SAPO protests

Having discussed how civil society actors draw on EU norms as leverage, through both the “sandwich model” and accession benchmarks, this section analyses the NABU/SAPO protests as an example of this dynamic in practice. In July 2025, the largest protests since Russia’s full-scale invasion emerged in response to the proposed adoption of Draft Law No. 21414, which sought to undermine the independence of Ukraine’s key anti-corruption agencies (NABU and SAPO).¹³⁵ Following the protests, Draft Law No. 21414 was reversed within days, restoring the autonomy of the two anti-corruption agencies. Within this context, respondents highlighted how civil society actors strategically leveraged EU-derived norms to frame opposition to the proposed draft law, and decisively, to support mobilisation against it.

Indeed, as Respondent 1 (anti-corruption expert) noted, opposition to the draft law was framed by civil society actors as a “protest against the government stealing another tool that would have gotten us closer to the dream of the EU”.¹³⁶ This demonstrates how civil society actors, by framing the proposed draft law as backsliding on Ukraine’s EU accession path, were able to mobilise public opposition and strengthen political pressure for its reversal. In addition to underscoring the implications of the draft law for Ukraine’s EU accession, civil society actors further mobilised public opposition by incorporating domestic anti-corruption arguments into their advocacy. Respondent 2 (CSO representative) described Draft Law No. 21414 as a “blatant attempt to adapt the law when we cannot adopt a lot of domestic legislative initiatives”.¹³⁷ This indicates that civil society actors strategically drew on domestic arguments related to frustrations with the pace of anti-corruption reform implementation to reinforce opposition to the draft law. As Respondent 2 further noted, the protestors “supported the general approach that you have to have top officials accountable, and NABU and SAPO was a case in that specific moment as an example tied to European integration”.¹³⁸ This demonstrates how opposition to the draft law was grounded in societal demands for

¹³⁵ K. Lindström, “Lessons for Europe after the protests in Ukraine”, SCEEUS Commentary No. 14, available at < <https://sceeus.se/en/publications/lessons-for-europe-after-the-protests-in-ukraine/> > [accessed 14/04/2026].

¹³⁶ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

¹³⁷ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

¹³⁸ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

political accountability, with EU accession serving as a normative framework through which these demands were able to be articulated by civil society actors.

Within the context of the NABU/SAPO protests, the data reveals how civil society actors strategically coordinated with EU partners to channel multi-level pressure towards the Ukrainian government, contributing to the reversal of the draft law. Respondents highlighted that, even prior to the outbreak of protests, civil society actors were engaged in close cooperation with EU partners to coordinate a uniform response to the threat the draft law posed to anti-corruption reform. Respondent 8 (CSO representative) noted that, during the passage of the draft law, “I was present at meetings with European officials, we were discussing different scenarios, what would happen if the parliament voted for it, so, it was scenario planning”.¹³⁹ This reveals how civil society actors engaged in early-stage consultations with EU partners in anticipation of the draft law’s passage, which therefore facilitated the channelling of multi-level pressure towards the government to reverse the proposed changes. Further, respondents described how this multi-level advocacy dynamic between civil society actors and EU partners was central in contributing to the reversal of the draft law. As Respondent 7 (policy organisation representative) noted, this dynamic “helped us to reverse these bad changes in the legislation and pushed our government to change the situation, the outcome was a combination of the different power instruments”.¹⁴⁰ This highlights how, in this context, civil society actors operationalised EU norms as leverage by coordinating with international partners to apply multi-level pressure on the Ukrainian government, which thereby contributed to the reversal of the draft law.

5.2.3. Translation of EU norms into domestic practices

Another key theme that emerged from the interview data was the translation of EU anti-corruption norms into domestic practices within Ukraine. Rather than being directly implemented, the data reveals EU-driven benchmarks and reform requirements require interpretation, often by civil society actors, in order to become meaningful within the

¹³⁹ Interview with Respondent 8 (CSO representative), conducted by the author via Zoom, March 2026.

¹⁴⁰ Interview with Respondent 7 (policy and organisation representative), conducted by the author via Zoom, March 2026.

domestic context. Within this theme, respondents described the specific ways that EU benchmarks are interpreted, how civil society actors function as key intermediaries within this process, and how EU-driven norms are framed within the Ukrainian context. Together, these insights reflect how EU norms are not directly transferred into the domestic environment, but rather take on meaning through their interpretation and contextualisation within Ukraine.

Interpretation of EU benchmarks within the domestic context

Within the data, several respondents described how the requirements of EU anti-corruption benchmarks are often both insufficiently clear and not immediately self-explanatory, therefore requiring them to be interpreted in order to be understood within the domestic context. This lack of immediate clarity indicates that EU benchmarks do not provide a uniform path for anti-corruption reform implementation, but instead require civil society actors to determine their practical meaning within the domestic reform context. As Respondent 6 (policy organisation representative) noted, the “main challenge with EU benchmarks lies in understanding the language and how to interpret it”.¹⁴¹ This suggests that benchmarks are often framed in overly technical or legalistic language, which limits their immediate utility and thus requires domestic actors to actively determine their intended meaning before they can be implemented within the domestic reform context. Respondent 6 further noted that EU benchmarks are frequently “not formulated in the best possible way as they are too vague and not concrete”.¹⁴² This underscores how the lack of specificity within certain EU benchmarks limits domestic actors’ understanding of what is required for their implementation, thereby requiring interpretation in order for them to be meaningfully implemented within the domestic reform context.

The data further indicates that this need for EU benchmarks to be interpreted by domestic actors is non-uniform and varies according to the level of specificity with which anti-corruption benchmarks are formulated. Several respondents described how this shapes the

¹⁴¹ Interview with Respondent 6 (policy organisation representative), conducted by the author via Zoom, March 2026.

¹⁴² Interview with Respondent 6 (policy organisation representative), conducted by the author via Zoom, March 2026.

extent to which interpretation by domestic actors is required, with some benchmarks providing specific direction for reform, while others often require greater interpretation in order to be translated into the domestic reform environment. As Respondent 5 (analytical organisation representative) noted, “some of the benchmarks are very concrete, but some are really broad and there are no specific recommendations, only the direction where we should move to”.¹⁴³ This underscores how EU benchmarks often provide general directions for reform implementation rather than clearly defined instructions, requiring domestic actors to interpret how these should be understood and translated into anti-corruption reform measures within the domestic context. In this regard, anti-corruption reform is not only shaped by EU accession benchmarks themselves, but also through the process of how domestic actors interpret and define their practical meaning within the local reform context. These insights therefore reveal how domestic actors shape the understanding and implementation of EU-driven anti-corruption reforms within the domestic reform environment.

Moreover, while certain EU anti-corruption benchmarks are formulated in less specific terms, respondents described how more measurable and concrete benchmarks enable domestic actors to more effectively translate their reform requirements into the local context. In particular, the data revealed how clearly defined benchmarks provide domestic actors with a basis for identifying the specific steps required to implement anti-corruption reform within the domestic context. As Respondent 10 (anti-corruption research expert) noted, these EU benchmarks are “asking for particular things, you can see the pathways on how to adapt these benchmarks and what you need to do”.¹⁴⁴ This reveals how clearly defined benchmarks provide domestic actors with a more structured basis for translating EU-driven reform requirements into relevant anti-corruption reform measures within the domestic context. Respondent 10 further noted, that with specific benchmarks, “it’s not a problem of losing you head trying to understand what was asked”.¹⁴⁵ This underscores how clearly defined EU benchmarks reduce the complexity of interpreting reform requirements, enabling domestic

¹⁴³ Interview with Respondent 5 (analytical organisation representative), conducted by the author via Zoom, March 2026.

¹⁴⁴ Interview with Respondent 10 (anti-corruption research expert), conducted by the author via Zoom, March 2026.

¹⁴⁵ Interview with Respondent 10 (anti-corruption research expert), conducted by the author via Zoom, March 2026.

actors to better understand how to implement anti-corruption reform within the domestic context.

Civil society actors as intermediaries in translating EU norms

An important aspect that emerged from the data is how domestic civil society actors function as intermediaries within the process of EU anti-corruption norm translation, through which these norms are interpreted and situated within the domestic context. This is reflected in how respondents described the process through which Ukrainian civil society actors provide EU partners with essential contextual knowledge for understanding the domestic reform environment. As Respondent 5 (analytical organisation representative) noted, “people who are sitting in Brussels don’t know the political background, we know a lot of information that’s really useful for them to understand the situation”.¹⁴⁶ This indicates that EU partners often lack sufficient understanding of the domestic anti-corruption reform context without the input of civil society actors. Here, civil society actors emerge as intermediaries in bridging this knowledge gap through which the domestic anti-corruption reform context is communicated to EU partners, thereby shaping how norms are understood.

In this regard, Respondent 4 (CSO representative) noted, “we have high-level communication with different EU institutions, these meetings usually happen in the format of us explaining things because people are clueless and need briefing on things that need to be done and on the whole context in general”.¹⁴⁷ This critical reflection demonstrates how civil society actors play a central role in ensuring that developments within the domestic reform context are understood by EU partners. Respondent 4 further noted, “from us, they receive the information that helps them understand the full picture of what’s going on”.¹⁴⁸ This underscores how civil society actors contribute to a more comprehensive and contextually grounded understanding of the domestic reform environment. In doing so, civil society actors shape how EU norms are interpreted and translated within the domestic context.

¹⁴⁶ Interview with Respondent 5 (analytical organisation representative), conducted by the author via Zoom, March 2026.

¹⁴⁷ Interview with Respondent 4 (CSO representative), conducted by the author via Zoom, March 2026.

¹⁴⁸ Interview with Respondent 4 (CSO representative), conducted by the author via Zoom, March 2026.

Beyond providing EU partners with contextual knowledge of the Ukrainian reform environment, the data reveals that civil society actors also influence how the EU interprets and evaluates domestic anti-corruption reforms. This is reflected in how respondents described the role of civil society actors in identifying the limitations of EU-driven reforms within the domestic context, and interpreting the underlying political dynamics that shape domestic reform implementation. As Respondent 5 noted, although the “European Commission knows that certain draft laws are submitted, we explain why they’re not effective, as we know the government’s position on it, what their real motives and real plans are”.¹⁴⁹ This highlights how civil society actors inform EU partners about the context-specific limitations of anti-corruption reform implementation, thereby shaping how reforms are understood and evaluated. Respondent 7 (policy organisation representative) noted, “sometimes we see that the EU are writing that this certain process is effective, but we have data that this process is not effective, so we share this information with them”.¹⁵⁰

5.2.4. Co-production of anti-corruption norms between EU and domestic actors

Within the interview data, a key theme that emerged was the co-production of anti-corruption norms between EU institutions and domestic civil society actors. Rather than originating primarily through top-down processes of external conditionality, the data highlights how EU anti-corruption norms are constantly shaped through ongoing collaboration, communication, and negotiation between domestic and international actors. In particular, respondents described how domestic civil society actors contribute to EU enlargement reports, the formulation of accession benchmarks, and the monitoring of anti-corruption reforms through sustained dialogue with EU partners. The data also indicates that these processes of co-production remain asymmetrical, as EU actors retain significant authority over which anti-corruption norms and reform priorities are institutionalised.

¹⁴⁹ Interview with Respondent 5 (analytical organisation representative), conducted by the author via Zoom, March 2026.

¹⁵⁰ Interview with Respondent 7 (policy organisation representative), conducted by the author via Zoom, March 2026.

Civil society actors as co-producers of EU anti-corruption norms

The data reveals that domestic civil society actors actively contribute to EU assessments and reporting on the progress of anti-corruption reform in Ukraine, with their analytical input often being directly incorporated into official reporting processes. Respondents described how exact phrasing from civil society assessments and shadow reports is frequently found within official EU documentation. As Respondent 2 (CSO representative) noted, “we even have specific paragraphs from our shadow reports quoted in EU enlargement reports”.¹⁵¹ This indicates that civil society actors co-produce EU norms through providing their input on domestic anti-corruption reform progress, which is then integrated into official EU reporting. Respondent 3 (analytical organisation representative) noted, “the European Commission relies on the point of view of civil society organisations, they use this information to make decisions and assessments on accession routes”.¹⁵² This reveals the extent to which EU institutions depend on civil society insight into the Ukrainian reform context, and how this actively guides their decision-making processes. In this context, the role of domestic civil society actors in co-producing EU anti-corruption norms emerges as both substantive, and embedded within institutional processes. As Respondent 7 (policy organisation representative) noted, “every time the European Commission develop their enlargement package, they send us requests to provide our view on the reform process...they actually hear us and highlight critical gaps that we identify”.¹⁵³ This further underscores that domestic civil society actors shape how EU anti-corruption norms are produced, with EU institutions actively seeking and incorporating civil society input into official assessment processes.

In addition to influencing EU decision-making processes, the data reveals how domestic civil society actors actively shape the formulation of accession benchmarks and anti-corruption reform priorities. In this regard, respondents described how civil society actors work closely with EU institutions to develop Ukraine’s anti-corruption reform obligations. Respondent 7

¹⁵¹ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

¹⁵² Interview with Respondent 3 (analytical organisation representative), conducted by the author via Zoom, March 2026.

¹⁵³ Interview with Respondent 7 (policy organisation representative), conducted by the author via Zoom, March 2026.

noted that “we are developing EU anti-corruption obligations for ourselves which we will share with European partners and then actually receive it as our own obligation”.¹⁵⁴ Interestingly, this indicates that domestic civil society actors formulate the substance of EU anti-corruption reform obligations prior to their official formalisation within the accession process. Further, Respondent 2 (CSO representative) noted “we studied the experience of the Western Balkan countries, and we pushed the European Commission and the EU to change the approach [for Ukraine] to make the benchmarks more problem-oriented”.¹⁵⁵ This reveals how, through providing the EU with insight into approaches that are more responsive to the Ukrainian reform context, civil society actors shape the formulation of accession benchmarks.

Taken together, these insights demonstrate the extent to which domestic civil society actors are involved in the co-production of EU anti-corruption norms, through their embedded role within key decision-making and accession processes. As Respondent 10 (anti-corruption research expert) noted, “a lot of anti-corruption reforms in Ukraine are also coming from internal experts, civil society and academia, so it’s not like the EU is developing or inventing the bicycle here and giving it to us and saying will you ride it or not?”.¹⁵⁶ This highlights how domestic civil society actors position themselves as active contributors to anti-corruption norms, rather than passive recipients of externally driven reforms. In this regard, respondents consistently challenged the notion that EU anti-corruption norms emerge through top-down processes of external conditionality, instead describing norm production as an ongoing and reciprocal process shaped through sustained dialogue between EU institutions and domestic civil society actors.

Institutionalised collaboration and communicative co-production

Having established the substantive role of domestic civil society actors in the co-production of EU anti-corruption norms, the data further reveals how these processes are sustained

¹⁵⁴ Interview with Respondent 7 (policy organisation representative), conducted by the author via Zoom, March 2026.

¹⁵⁵ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

¹⁵⁶ Interview with Respondent 10 (anti-corruption research expert), conducted by the author via Zoom, March 2026.

through institutionalised collaboration and ongoing communicative exchange between EU institutions and domestic actors. Indeed, several respondents described communication between EU institutions and domestic civil society actors as regular, sustained, and increasingly embedded within anti-corruption reform processes. As Respondent 1 (anti-corruption expert) noted, “there is very much a trusted dialogue between civil society and the European Commission”.¹⁵⁷ This indicates that communication extends beyond an ad hoc basis and instead functions as an embedded component of the anti-corruption reform process. Respondent 2 (CSO representative) similarly noted, in regard to recommendations from the EU, “we usually understand what will be there because we talk with them on a permanent basis”.¹⁵⁸ This reveals how communication between EU institutions and domestic civil society actors is sustained through continuous dialogue, which facilitates mutual exchange on anti-corruption reform priorities. Further, as Respondent 9 (technical assistance expert) noted, “communication from the EU with Ukrainian civil society actors is quite intensive, feedback from civil society is well received and their views are taken into account”.¹⁵⁹ This highlights how the communicative exchange is both continuous and substantive, with civil society insights into the domestic context being actively incorporated into anti-corruption reform processes.

The data demonstrates how, alongside formalised consultation processes, the co-production of anti-corruption norms also occurs through informal interactions between EU institutions and domestic civil society actors. Respondents noted that communication with EU actors often extends beyond formal meetings and consultation mechanisms, and instead takes place through informal channels. As Respondent 2 (CSO representative) noted, “we are in closer contact with the representatives of the European Commission through calls and WhatsApp messages, et cetera”.¹⁶⁰ This highlights how interactions between EU institutions and domestic civil society actors routinely occur within informal channels, which reflects the closeness and continuous nature of their communication. Respondent 2 further noted that representatives of the European Commission “often reach out, like: ‘have you heard of this

¹⁵⁷ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

¹⁵⁸ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

¹⁵⁹ Interview with Respondent 9 (technical assistance expert), conducted by the author via Zoom, March 2026.

¹⁶⁰ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

bill? What is your opinion on that?’ And then we have this conversation”.¹⁶¹ This indicates that, within these informal channels, domestic civil society actors function as interlocutors within EU anti-corruption reform processes, as EU actors actively seek their insight into the domestic reform context. Moreover, Respondent 9 (technical assistance expert) noted that, when EU Commission representatives visit Kyiv, “they not only have meetings with government officials or the parliament, but also informal meetings with civil society”.¹⁶² This demonstrates how informal exchange with domestic civil society actors has become institutionalised within EU anti-corruption reform processes, thereby reinforcing the co-production of EU anti-corruption norms.

Further, the data reveals how these ongoing forms of communication between EU institutions and domestic civil society actors have resulted in mutual familiarity and contextual understanding within anti-corruption reform processes. In this regard, respondents described how EU actors have developed a strong understanding of the Ukrainian anti-corruption reform context through continued engagement with domestic civil society actors. Respondent 1 (anti-corruption expert) characterised the relationship between these actors as a “marriage of a very old couple, they know what the other is about to say and what is a proper way to get a certain reaction back”.¹⁶³ This indicates the extent to which sustained dialogue between EU institutions and civil society actors has facilitated mutual understanding and strategic awareness of domestic anti-corruption reform. Respondent 1 further noted that EU actors working on the Ukraine portfolio are people “who have really lived here, not just being parachuted in and out on missions, they used their own lived experience in the country to understand and interpret the messages that they get”.¹⁶⁴ This indicates that EU actors have acquired a contextually informed understanding of domestic anti-corruption reform processes. Respondent 2 (CSO representative) similarly noted, “European Commission representatives know the context, the political, the economical, they speak the language even”.¹⁶⁵ This underscores how sustained dialogue between EU

¹⁶¹ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

¹⁶² Interview with Respondent 9 (technical assistance expert), conducted by the author via Zoom, March 2026.

¹⁶³ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

¹⁶⁴ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

¹⁶⁵ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

institutions and domestic civil society actors has facilitated the co-production of anti-corruption norms through mutual understanding of the Ukrainian reform context.

Asymmetries and limitations within co-production

While the data has demonstrated that domestic civil society actors have a substantial role in the co-production of EU anti-corruption norms, it also reveals that these processes remain shaped by asymmetrical power dynamics. In this regard, several respondents described how EU institutions retain significant authority over the interpretation of domestic input within anti-corruption reform processes. As Respondent 1 (anti-corruption expert) noted, the EU does not “just take the opinion of the government or of civil society organisations at face value, but actually makes up their own opinion and listen to counter arguments”.¹⁶⁶ This indicates that, while domestic actors make substantial contributions to anti-corruption reform discussions, EU institutions retain authority over how their perspectives are evaluated within co-production processes. Respondent 1 further noted that EU actors “know what filters to use to assess those claims”.¹⁶⁷ This reveals how input from domestic actors is selectively mediated by EU institutions, rather than being automatically incorporated into anti-corruption reform processes.

Moreover, respondents identified tensions between EU institutions and domestic civil society actors arising from differing understandings of anti-corruption reform priorities. As Respondent 2 (CSO representative) noted, in regard to EU recommendations on lobbying legislation, “it’s a universal opinion that in the Ukrainian national context, it was not a priority”.¹⁶⁸ This indicates that, despite sustained collaboration between EU institutions and domestic civil society actors, differing understandings of anti-corruption reform priorities continue to shape co-production processes. Respondent 2 further noted that “everyone in the European Commission and Parliament, who I personally talked with, said that the lobbying regulation was not a great idea, but everyone in the European Union has a regulation on lobbying, so you have to do it anyway”.¹⁶⁹ This demonstrates how EU anti-

¹⁶⁶ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

¹⁶⁷ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

¹⁶⁸ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

¹⁶⁹ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

corruption reform priorities may reflect technocratic and regulatory obligations within the European Union, even in instances where domestic civil society actors question their relevance within the Ukrainian reform context.

The data reveals how asymmetrical power dynamics within co-production are reinforced through limitations in the transparency and accessibility of specific anti-corruption reform processes. In particular, respondents described how key aspects of accession benchmark formulation and anti-corruption reform coordination remain only partially accessible to domestic civil society actors. As Respondent 10 (anti-corruption research expert) noted, “the development of EU benchmarks is a closed process”.¹⁷⁰ This indicates that the co-production of anti-corruption norms remains shaped by asymmetrical power dynamics in relation to how benchmarks are formulated, with access to these processes concentrated among a limited number of actors. Respondent 10 further noted that “nobody actually saw them, it is a secret document, we didn’t know what’s going to be in them, this process was a closed cooperation rather than an open one”.¹⁷¹ This highlights how key aspects of EU anti-corruption reform processes are characterised by restricted transparency and access to information. Within this context, the co-production of anti-corruption norms emerges as a process that, while certainly collaborative, remains shaped by selective institutional access and asymmetrical power dynamics.

¹⁷⁰ Interview with Respondent 10 (anti-corruption research expert), conducted by the author via Zoom, March 2026.

¹⁷¹ Interview with Respondent 10 (anti-corruption research expert), conducted by the author via Zoom, March 2026.

5.2.5. Implementation gap between formal compliance and substantive reform

The final key theme that emerged from the interview data was the implementation gap between formal compliance with EU anti-corruption conditionality and substantive domestic reform. While EU conditionality has driven substantial legislative and institutional reform in Ukraine, the data reveals persistent tensions between the formal fulfilment of EU obligations and the substantive implementation of anti-corruption reforms. Here, the data highlights how anti-corruption reform processes may become oriented towards EU benchmark fulfilment, without necessarily producing substantive long-term institutional or political transformation. In particular, respondents described how anti-corruption reform processes prioritise symbolic compliance, how benchmark-driven conditionality encourages technocratic approaches to reform, and how political obstacles continue to constrain substantive reform implementation. Taken together, these insights indicate that the institutionalisation of EU anti-corruption norms may not correspond to their substantive implementation within the domestic reform context.

Formal compliance and “symbolic” reform

The data reveals that anti-corruption reform processes increasingly prioritise the formal fulfilment of EU conditionality and visible compliance with accession benchmarks over substantive anti-corruption reform implementation. In this context, respondents described how anti-corruption reforms are often adopted in ways that demonstrate visible alignment with EU accession obligations, while their substantive relevance and implementation within the domestic reform context remain contested. As Respondent 2 (CSO representative) noted, in regard to lobbying legislation,¹⁷² “it’s not a secret that it was just to put a check that we fulfilled it, it’s not actually useful, it was just adopted to put a checkbox that we did it and the EU took it as fulfilment”.¹⁷³ This indicates that anti-corruption reforms may become prioritised according to their ability to demonstrate compliance with EU accession obligations, even in instances where domestic actors question their practical relevance within

¹⁷² Here, Respondent 2 is referring to Ukraine’s Law No. 3606-IX “On Lobbying”, which entered into force on 1 September 2025.

¹⁷³ Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

the Ukrainian reform context. Moreover, respondents described how Ukraine's anti-corruption reform progress is often communicated through highly visible reforms within the EU accession process. As Respondent 1 (anti-corruption expert) noted, "Ukraine is currently listing the things that are easy to show off as a success".¹⁷⁴ This reflects how anti-corruption reform priorities are frequently associated with adopting measures that are most demonstrable as evidence of accession progress, while more relevant domestic reforms may risk receiving less attention.

Alongside this, the data further highlights how anti-corruption reforms often become formally institutionalised without necessarily leading to substantive and sustained implementation within the domestic reform context. Here, respondents noted how anti-corruption reforms associated with formal compliance may undermine long-term reform momentum and substantive domestic implementation. As Respondent 6 (policy organisation representative) noted, "faster completion of certain activities with basic quality, or with applying short cuts is fake reform, and this is always much worse than no reform, because you lose the momentum and the opportunity".¹⁷⁵ This indicates that reforms implemented primarily for the purpose of formal compliance may weaken opportunities for substantive and long-term reform by creating the appearance of progress without resulting in meaningful change within the domestic environment. In this context, respondents raised concerns that anti-corruption reforms may be formally presented as adopted despite limited substantive implementation, particularly in instances in which domestic civil society actors are excluded from the reform process. As Respondent 10 (anti-corruption research expert) noted, this "creates the scenario of false reporting, fake implementation, and formal implementation".¹⁷⁶ This reveals how the exclusion of civil society actors from anti-corruption reform processes may facilitate formal compliance without sufficient oversight of substantive reform implementation within the domestic context. Further, several respondents characterised these aspects of anti-corruption reform as increasingly performative in relation to the EU accession process. As Respondent 5 (analytical organisation representative) noted, "it's always a dog and pony show, the government try and make something and call it reform, but

¹⁷⁴ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

¹⁷⁵ Interview with Respondent 2 (policy organisation representative), conducted by the author via Zoom, March 2026.

¹⁷⁶ Interview with Respondent 10 (anti-corruption research expert), conducted by the author via Zoom, March 2026.

it helps with nothing”.¹⁷⁷ This underscores how certain anti-corruption reforms have become performative within the accession process, with formal compliance and more visible reforms increasingly prioritised over substantive domestic implementation.

Moreover, the data reveals that this performative dynamic shapes how Ukraine’s anti-corruption reform progress is communicated, with reform developments often framed through externally demonstrable indicators of accession progress. In this regard, respondents described how the selective prioritisation of externally visible reforms often diverts attention away from substantive domestic anti-corruption reform implementation. As Respondent 6 (policy organisation representative) noted, the government “can just cherry pick what they are fulfilling and say to the EU, ‘look, we are fulfilling this, we’ve done that’”.¹⁷⁸ This demonstrates the tendency of political actors to prioritise anti-corruption reforms that are more demonstrable as evidence of accession progress, while the implementation of more substantive reforms remains secondary. This dynamic is further reflected in how respondents described anti-corruption reforms being formally adopted and communicated as evidence of accession progress despite limited evidence for their substantive implementation. As Respondent 5 (analytical organisation representative) noted, in Ukraine, “you can just simply create a formal law which would not be implemented, but formally it would exist, you can say to the EU, ‘we adopted this law like you asked’”.¹⁷⁹ This further highlights how the formal adoption of anti-corruption reforms is prioritised as evidence of accession progress, despite limited substantive implementation within the domestic context.

Technocratic conditionality and the limits of measurable reform

Further, the data highlights the limitations of technocratic forms of EU conditionality in facilitating the substantive implementation of anti-corruption reforms within the domestic context. In this regard, respondents questioned whether substantive anti-corruption reform can be effectively achieved through formal benchmarks and technocratic indicators alone.

¹⁷⁷ Interview with Respondent 5 (analytical organisation representative), conducted by the author via Zoom, March 2026.

¹⁷⁸ Interview with Respondent 6 (policy organisation representative), conducted by the author via Zoom, March 2026.

¹⁷⁹ Interview with Respondent 5 (analytical organisation representative), conducted by the author via Zoom, March 2026.

As Respondent 1 (anti-corruption expert) noted, in the Ukrainian accession context, “there is a serious dialogue about where the limit is between ticking the box formalistically and making sure that while everything sounds fine on paper, is it as fine as it can be in real life?”¹⁸⁰ This underscores the key tension for domestic actors in distinguishing between formal compliance with EU accession-related anti-corruption obligations, and the substantive implementation of reforms within the Ukrainian context. Moreover, respondents emphasised that the translation of anti-corruption reform into measurable EU benchmarks often produces ambiguity regarding what constitutes substantive implementation. As Respondent 1 noted, critiquing the specificity of accession benchmarks, “how much depoliticised would you like it to be, 35% or 73%? How much depoliticisation is enough? And what is depoliticisation?”¹⁸¹ These insights reveal the limitations of EU benchmark-driven approaches to anti-corruption reform, with measurable benchmarks often unable to effectively capture the complex realities of the domestic reform context.

Alongside this, the data demonstrates how highly detailed EU benchmarks may encourage formal compliance without necessarily ensuring substantive anti-corruption reform implementation. As Respondent 2 (CSO representative) noted, “if you make conditionality and benchmarks too detailed, you are risking tying yourself up in a situation where formalistically speaking, everything is done, but you are still unhappy”.¹⁸² This indicates the limitations of technocratic EU approaches that frame anti-corruption reform as achievable through the fulfilment of increasingly detailed benchmarks, despite the substantive implementation of reform within the Ukrainian context extending beyond formal compliance. Respondent 10 (technical assistance expert) noted that “once these laws are adopted, conditionality is considered to be met”.¹⁸³ This highlights how, within EU conditionality, the formal adoption of anti-corruption legislation is considered as sufficient evidence of reform progress, while the substantive implementation of reform remains less ensured. Further, as Respondent 1 (anti-corruption expert) noted, “we’re way beyond ‘just launch another institution and this will be your silver bullet’”.¹⁸⁴ This indicates that, within

¹⁸⁰ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

¹⁸¹ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

¹⁸² Interview with Respondent 2 (CSO representative), conducted by the author via Zoom, March 2026.

¹⁸³ Interview with Respondent 10 (technical assistance expert), conducted by the author via Zoom, March 2026.

¹⁸⁴ Interview with Respondent 1 (anti-corruption expert), conducted by the author via Zoom, March 2026.

the Ukrainian context, substantive anti-corruption reform is no longer understood as attainable through the creation of new institutions. These insights thus reflect the limitations of technocratic approaches to EU anti-corruption conditionality in ensuring substantive reform implementation within the domestic context.

Political constraints on substantive reform implementation

Having addressed the limitations of technocratic approaches to anti-corruption reform associated with EU conditionality, the data reveals how domestic political dynamics often further constrain the substantive implementation of reform within the Ukrainian context. In particular, respondents emphasised a disconnect between the formal adoption of EU-driven reforms and sustained political commitment towards substantive reform implementation. As Respondent 9 (technical assistance expert) noted, “the challenge is in how to properly implement anti-corruption reforms when political actors are not interested in delivering on these reforms”.¹⁸⁵ This underscores how domestic political resistance can constrain the implementation of anti-corruption reform, thereby widening the gap between formal compliance and substantive implementation. Respondent 10 (anti-corruption research expert) similarly noted, “we have everything in place, but it’s now a problem of implementation”.¹⁸⁶ This reflects how the formal adoption of anti-corruption reforms does not necessarily translate into substantive implementation, with implementation challenges within the domestic context continuing to persist beyond the formal adoption stage. Together, these findings indicate that the key challenges surrounding substantive anti-corruption reform often emerge at the implementation stage, rather than through the formal adoption of reforms.

Alongside this, the data highlights how the substantive implementation of anti-corruption reform requires sustained domestic engagement beyond the formal fulfilment of EU benchmarks. In this regard, respondents described substantive reform implementation as a complex process involving constant navigation of institutional and governance challenges

¹⁸⁵ Interview with Respondent 9 (technical assistance expert), conducted by the author via Zoom, March 2026.

¹⁸⁶ Interview with Respondent 10 (anti-corruption research expert), conducted by the author via Zoom, March 2026.

within the domestic context. As Respondent 7 (policy organisation representative) noted, “the real work is the daily management of anti-corruption issues that may be broader than just the formulation of benchmarks”.¹⁸⁷ This insight reflects how substantive anti-corruption reform implementation is understood by domestic actors as an ongoing governance process which cannot be reduced to the formal fulfilment of EU benchmarks. Respondent 6 (policy organisation representative) similarly described institutional governance dynamics as constraining substantive reform implementation, noting “how ineffective and inefficient the system is”.¹⁸⁸ This highlights how institutional inefficiencies within the domestic context further constrain the substantive implementation of anti-corruption reform, despite the formal fulfilment of EU conditionality requirements.

Taken together, these implementation challenges raise broader concerns regarding the long-term continuity of substantive anti-corruption reform within the Ukrainian context. Here, respondents expressed concerns that persistent implementation weakness may leave anti-corruption reforms particularly vulnerable to backsliding over time. As Respondent 10 (anti-corruption research expert) noted, “reform backsliding could happen, unless the EU legislation establishes somewhere that if Ukraine’s backsliding, we will take back the membership”.¹⁸⁹ This indicates that, without sustained external oversight from the EU, domestic implementation weaknesses may leave anti-corruption reform vulnerable to political backsliding. Further, Respondent 6 (policy organisation representative) noted, formal compliance is a “very short-sighted approach, even in midterm horizons it would lead to a big failure in each and every dimension”.¹⁹⁰ This underscores how anti-corruption reform approaches centred primarily on formal compliance with EU accession requirements, without sustained substantive implementation within the domestic context, may ultimately weaken the long-term sustainability of reform and increase vulnerability to political backsliding.

¹⁸⁷ Interview with Respondent 7 (policy organisation representative), conducted by the author via Zoom, March 2026.

¹⁸⁸ Interview with Respondent 6 (policy organisation representative), conducted by the author via Zoom, March 2026.

¹⁸⁹ Interview with Respondent 10 (anti-corruption research expert), conducted by the author via Zoom, March 2026.

¹⁹⁰ Interview with Respondent 6 (policy organisation representative), conducted by the author via Zoom, March 2026.

6. Conclusion and Discussion

6.1. Discussion

The interview findings indicate that the influence of EU-promoted anti-corruption norms extends beyond formal mechanisms of accession conditionality. While respondents consistently identified EU accession conditionality as a key driver of anti-corruption reform, the findings reveal how domestic actors actively interpret, mobilise, and adapt EU-promoted norms within the Ukrainian accession context. In particular, anti-corruption accession benchmarks emerged not only as compliance requirements, but also as sources of leverage that could be strategically deployed to strengthen domestic advocacy efforts and advance reform objectives. The findings further indicate that domestic actors contribute to shaping the interpretation and practical application of EU-promoted norms through ongoing engagement with key EU institutions. Taken together, these findings point towards a more interactive understanding of EU-promoted norm diffusion than is implied in predominantly top-down accounts of accession-driven reform.

These findings align with literature on norm diffusion that emphasises the active role of domestic actors in shaping normative outcomes. Rather than functioning as passive recipients of externally promoted norms, respondents described actively interpreting and mobilising EU anti-corruption benchmarks within domestic reform processes. Interestingly, this reflects Acharya's argument that external norms are adapted through interaction with local actors, rather than being transferred unchanged into domestic contexts.¹⁹¹ However, the findings also suggest that domestic actors contribute to shaping the practical application of EU-promoted norms through ongoing engagement with EU institutions. This resonates with Zimmermann's argument that greater attention should be paid to the interaction between norm promoters and domestic actors in processes of norm diffusion.¹⁹² Moreover, the prominence of anti-corruption benchmarks as tools for domestic advocacy illustrates

¹⁹¹ A. Acharya, 'How Ideas Spread: Whose Norms Matter? Norm Localization and Institutional Change in Asian Regionalism', *International Organization* 58.2 (2004) 239-275, pp. 241-242.

¹⁹² L. Zimmermann, 'Introduction: Between Global Norms and Local Translation' in *Global Norms with a Local Face: Rule-of-Law Promotion and Norm Translation* (Cambridge University Press 2017) 1-22, p. 3.

how accession conditionality can generate resources that domestic actors actively deploy in pursuit of reform objectives. In this regard, the findings extend existing accounts of accession-driven reform by demonstrating how EU-promoted norms can be operationalised by domestic actors as instruments of political leverage, rather than functioning solely as external compliance requirements.¹⁹³

The findings further indicate that domestic actors participate in shaping how EU-promoted anti-corruption norms are interpreted and applied within the accession process. Respondents frequently described ongoing engagement with EU institutions through consultations, feedback processes, and informal channels of communication that enabled them to contribute to discussions surrounding anti-corruption reform priorities and accession benchmarks. This finding aligns with Zimmermann's critique of approaches to norm diffusion that overlook the interaction between norm promoters and domestic actors, as respondents described opportunities to influence how anti-corruption reform priorities and benchmarks were understood in practice.¹⁹⁴ Rather than occupying a purely receptive role, domestic actors appeared to participate in the ongoing interpretation and practical application of accession-related reform expectations. This suggests that processes of EU-promoted anti-corruption diffusion may involve elements of co-production, in which normative meaning is shaped through interaction between domestic and EU actors.

Taken together, these findings have broader implications for understanding processes of norm diffusion. Rather than depicting norms as being transferred from external actors to domestic recipients, the findings indicate that norm diffusion is shaped through processes of interpretation, interaction, and adaptation. This interpretation is consistent with approaches to norm diffusion that emphasise the active role of domestic actors in shaping normative outcomes through processes of localisation, translation, and interaction.¹⁹⁵ More broadly, the findings suggest that domestic actors influence not only how externally promoted norms are adapted to local contexts, but also how their meaning and practical significance are constructed within ongoing reform processes. Therefore, the findings challenge

¹⁹³ Frank Schimmelfennig and Ulrich Sedelmeier, 'The Europeanisation of Eastern Europe: The External Incentives Model Revisited', *Journal of European Public Policy*, 27.6 (2020), 814-833, pp. 814.

¹⁹⁴ L. Zimmermann, 'Introduction: Between Global Norms and Local Translation' in *Global Norms with a Local Face: Rule-of-Law Promotion and Norm Translation* (Cambridge University Press 2017) 1-22, p. 3.

¹⁹⁵ A. Acharya, 'How Ideas Spread' (2004); S.E. Merry, 'Transnational Human Rights and Local Activism' (2006).

understandings of norm diffusion that conceptualise domestic actors primarily as recipients of externally promoted norms, instead foregrounding their role in shaping the meaning and practical application of such norms within domestic reform contexts.

Moreover, the findings have broader implications for understanding the relationship between anti-corruption reform and human rights. Although EU-promoted anti-corruption norms are primarily framed within the accession process as governance and rule-of-law requirements, the findings indicate that domestic anti-corruption actors contribute to broader efforts to strengthen institutional accountability and transparency.¹⁹⁶ By supporting reforms aimed at reducing corruption and improving institutional oversight, such actors contribute to the institutional conditions that underpin the protection and realisation of human rights.¹⁹⁷

Limitations and implications for future research

Several limitations should be considered when interpreting the findings of this thesis. First, the analysis draws primarily on interviews with Ukrainian anti-corruption professionals and therefore reflects the perspectives of actors directly engaged in anti-corruption advocacy and reform. The perspectives of political actors, public officials, and representatives of EU institutions were beyond the scope of this thesis and may provide additional insight into how anti-corruption norms are negotiated, interpreted, and implemented throughout the accession process. Moreover, Ukraine's distinctive political and geopolitical circumstances may limit the transferability of these findings to other candidate countries. Further research could explore whether similar patterns of domestic agency, interaction with EU institutions, and strategic mobilisation of accession benchmarks emerge across other EU candidate countries. Longitudinal research may also provide valuable insight into how these dynamics evolve as accession negotiations progress.

¹⁹⁶ A. Mungiu-Pippidi, *The Quest for Good Governance: How Societies Develop Control of Corruption* (Cambridge: Cambridge University Press 2015).

¹⁹⁷ A. Peters, 'Corruption as a Violation of International Human Rights', *European Journal of International Law*, 29.4 (2018), pp. 1251-1287.

6.2. Conclusion

This thesis has explored how Ukrainian anti-corruption actors understand and operationalise EU-promoted anti-corruption norms within the context of Ukraine's EU accession. On the basis of this study, it can be concluded that such actors play a central role in shaping how EU-promoted anti-corruption norms are understood and operationalised within domestic reform processes. The findings demonstrate that EU anti-corruption benchmarks function as tools that domestic actors strategically leverage to advance anti-corruption reform objectives and strengthen advocacy efforts. Moreover, ongoing engagement with EU institutions provides opportunities for domestic actors to contribute to the interpretation and practical application of anti-corruption reform priorities throughout the accession process. Taken together, these findings indicate that Ukrainian anti-corruption actors understand EU-promoted anti-corruption norms as both formal accession requirements and resources for advancing domestic reform, while operationalising them through processes of advocacy, engagement, and interaction throughout the accession process.

This thesis has demonstrated the importance of domestic agency in shaping how EU-promoted anti-corruption norms acquire their meaning and practical significance within accession contexts. By foregrounding the perspectives and experiences of Ukrainian anti-corruption actors, this thesis has shown that the diffusion of EU-promoted norms is shaped through ongoing processes of interpretation, mobilisation, and interaction throughout the accession process. The findings therefore indicate that understanding accession-driven reform requires attention to the actors and relationships through which EU-promoted norms are understood, negotiated, and operationalised in practice.

Moreover, the findings of this thesis have broader implications for understanding the relationship between anti-corruption reform and human rights. The findings indicate that efforts to advance anti-corruption reform may also contribute to strengthening the institutional conditions that underpin the protection and realisation of human rights. In this regard, anti-corruption reform can be understood as part of broader efforts to strengthen governance structures that support the effective protection of rights.

Taken together, this thesis has demonstrated that EU-promoted anti-corruption norms acquire much of their practical significance through the ways in which domestic actors interpret, mobilise, and operationalise them within domestic reform processes. The Ukrainian case therefore illustrates how accession-driven reform is shaped through ongoing interaction between externally promoted reform frameworks and domestic actors engaged in advancing domestic reform. Recognition of these local dynamics is thus essential for understanding how externally promoted norms become embedded within domestic political and institutional contexts in accession processes.

7. Annex I – Interview Guide

1) Professional experience:

1.1) Could you please tell me a little about your professional engagement with the topics of anti-corruption and European Integration?

- How long have you worked on these issues?
- What is your current role?
- Which institutions, sectors, or reform processes have you engaged with most closely?

2) Organisational work:

2.1) How does your organisation approach and advocate for anti-corruption reform in Ukraine? Has this approach changed since Ukraine received EU candidate status and the accession process became more structured?

2.3) What specific anti-corruption reforms has your organisation advocated for in recent years?

3) Experience with EU-driven reform:

3.1) From your experience, have you found EU benchmarks valuable for pushing for anti-corruption reform in Ukraine, and for making changes on the ground?

- Do they matter mostly politically, institutionally, or operationally?
- Are they more useful in some reform areas than in others?

3.2) In what specific ways do you operationalise and interpret EU benchmarks to push the government for anti-corruption reform?

- Do you use them as leverage in dialogue with government institutions?
- Do you translate them into concrete legal, policy or institutional recommendations?
- Are the benchmarks sufficiently clear and specific for advocacy purposes?

3.3) Have you experienced differences in the effectiveness of your anti-corruption advocacy when it draws on EU benchmarks, versus without?

- What was the issue?
- Who were the relevant stakeholders?

- Why did the benchmark help?
- Did it lead to concrete change?
- What limited their effectiveness?
- Was the problem political resistance, legal ambiguity, weak implementation, or something else?
 - How did you adapt your strategy?

3.4) From your experience, is anti-corruption advocacy more effective when it relies on EU benchmarks than when it relies mainly on domestic arguments, public demand, or other international standards?

3.5) In your view, what would happen to anti-corruption reform in Ukraine if EU-driven conditionality weakened?

4) Interaction with international partners:

4.1) How do you communicate your opinion regarding the effectiveness of benchmarks to international partners? Is there an ongoing dialogue, and what could be improved in this regard?

- Which partners do you engage with most often?
- Is this communication regular or ad hoc?
- Do you feel your feedback is heard and reflected?

4.2) How would you assess the quality of dialogue between CSOs and international partners on anti-corruption reform?

- What works well in this dialogue?
- What is missing?
- Are there areas where international partners misunderstand local reform dynamics?

4.3) What could be improved in the way international partners design, communicate, or monitor anti-corruption benchmarks for Ukraine?

5) Reflection:

5.1) What role does civil society play in promoting and sustaining anti-corruption reforms in Ukraine?

8. Bibliography

Primary sources

Interviews

All interviews were conducted by the author via Zoom in March 2026. Respondents are anonymised as per the thesis.

Interview with Respondent 1 (anti-corruption expert)

Interview with Respondent 2 (CSO representative)

Interview with Respondent 3 (policy and analytical organisation representative)

Interview with Respondent 4 (CSO representative)

Interview with Respondent 5 (analytical organisation representative)

Interview with Respondent 6 (policy organisation representative)

Interview with Respondent 7 (policy organisation representative)

Interview with Respondent 8 (CSO representative)

Interview with Respondent 9 (technical assistance expert)

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