

POLICY TRACKER

UPDATE ON POLITICS, LEGAL REFORMS AND BUSINESS IMPACT IN UKRAINE



LAWS & REGULATIONS



#finance #rebuild

LAW ON THE NATIONAL DEVELOPMENT INSTITUTION (NDI)

Before: There is no central institution for managing the government's financial and other support to businesses. Some of the programmes are administered by state-owned banks, some by Export Crediting Agency (ECA).

Policy Change: The NDI will issue loans, guarantees, grants, fees compensation, etc. in the interest of Ukraine's economic and social development and recovery. Moreover, the NDI will analyse the efficiency of the support programmes.

Why it is important: The NDI will (or at least should) be a key element of the recovery and government support infrastructure. It will take over functions from state-owned banks or the ECA, which are unnatural for them. Businesses and international partners will have a much clearer path to get government-backed financial support.

What to do: Follow the [NDI](#) for opportunities which might be relevant for your business.



#insurance #war_damage

CMU RESOLUTION 1541 ON INSURANCE FOR WAR DAMAGES

Before: Some insurance companies offer coverage for war damages to property, however, the rates are high.

Policy Change: The Government offers to cover part of the insurance companies' fees. The company will pay only 1%, with the compensation capped at UAH 1 mln. The entity responsible is the Export Crediting Agency (ECA).

Why it is important: Affordable insurance against war risks is a very important factor for increasing the stability of businesses operating in Ukraine.

What to do: If such insurance is relevant for your business, contact the ECA, or your insurance company. To note, the funds allocated for compensations in the state budget are limited.



#chemical_products #environment_regulations #REACH

DELAY IN REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) AND CLP (Classification, Labelling and Packaging) IMPLEMENTATION

Before: The REACH and CLP requirements for substance registration should have become applicable from November 2025. However, due to the government reshuffle, the now responsible Ministry of Economy lacked resources to work with the filings.

Policy Change: The enforcement of REACH requirements has been postponed until 2029 for large quantities of substances, and even further for smaller quantities. The CLP requirements are postponed until 2027 and 2028 (for mixtures). More details on the implementation of REACH and CLP are available at our member's [legal alert](#).

Why it is important: It impacts companies importing chemical substances.

What to do: AHK delegated a representative to the ministerial working group on REACH and CLP implementation. Please contact the advocacy team if you have feedback or concerns regarding the implementation of REACH and CLP.

DRAFT LAWS & REGULATIONS



#labour_code #employment DRAFT LABOUR CODE [🔗](#)

Status Quo: Ukraine is governed by the Soviet Labour Code of 1971. It underwent a lot of changes but still bears the spirit of imbalanced regulation that is no longer suited to today's market conditions.

Potential Policy Change: According to the Government, the new Code is based on EU standards and focuses on better balance, avoidance of conflicts, the fight against illegal employment, and digitalization.

Perspectives of the bill: High chances to be adopted since it is a government bill, for which the Government actively advocates. However, the consideration of the draft Code could take relatively long time due to large number of stakeholders.

Why this is important: Labour relations are important for each business, especially amid workforce crisis in Ukraine. A regulation that is more modern and aligned with EU approaches, as well as the practices of the European Convention on Human Rights (ECHR), would benefit businesses overall.

What to do: The HR and Legal committees of AHK join forces to analyse and elaborate a position regarding the draft Code. If you understand that any of the proposed approaches would not work in practice or will create additional burden for your business, please contact us for advocacy support.



#employment #foreigners_employment #expats DRAFT LAW 14211 ON THE EMPLOYMENT OF FOREIGNERS [🔗](#)

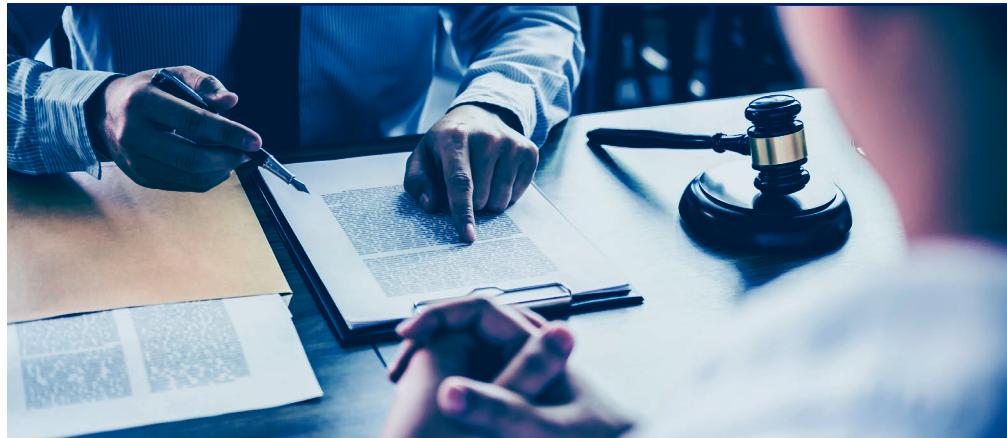
Status Quo: Foreigners must obtain two separate permits for work and for residence in Ukraine.

Potential Policy Change: The key change is an introduction of a unified permit for work and residence. Moreover, EU citizens obtain free access to Ukraine's employment market. Also, a state web-portal for foreigners' employment will be established.

Perspectives of the bill: High chances to be adopted since it is a government bill. Also, the Draft Law (DL) is supposed to implement EU Directive 2024/1233.

Why this is important: A lot of subsidiaries of foreign companies have foreign top managers in Ukraine. The procedure for employing EU citizens will be simplified by the DL, which will benefit Ukrainian companies hiring such employees. Meanwhile, the employment and residence procedures for all foreign nationals will be amended. These changes should be considered by all employers of foreign staff and reflected in their internal processes.

What to do: Access the DL from the point of view of your company's needs – especially if you have foreign top managers or contemplate involving foreign workers. If you see that the DL needs change – please let us know.



#unfair_competition #retail #food_agriculture

DRAFT LAW 6068-Д ON UNFAIR PRACTICES IN AGRICULTURE PRODUCTS SUPPLY

Status Quo: Unlike in the EU, in Ukraine there is no specific regulation for retailer-supplier relations regarding the supply of food and agriculture goods. Competition law could formally apply. However, in practice, there have been no cases, except for one in the mid-2010s, which was successfully challenged in court.

Potential Policy Change: The Draft Law (DL) protects food and agriculture suppliers, especially of perishable goods, against payment delays, additional charges, and other unfavourable contract conditions. The responsible authority would be the Antimonopoly Committee of Ukraine.

Perspectives of the bill: High chances to be adopted, as it is a 'committee' DL submitted after discussions on previously submitted draft laws on the subject. Also, the DL implements EU Directive 2019/633.

Why this is important: The DL impacts a wide range of companies supplying food and agriculture products to retailers, even if such products are supplied indirectly via distributors. The DL could change the current negotiating balance between these parties.

What to do: Check whether 1) your products are covered by the DL; 2) you and your counterparts are meeting thresholds, so your contracts are covered by the DL. If you think some of the proposed norms would not benefit your business, let us know to discuss advocacy options.



#philanthropy #charity #support_Ukraine

DRAFT LAW ON 14276 ON PHILANTHROPY IN THE FIELD OF CULTURE

Status Quo: Philanthropy in the field of culture is not regulated which creates compliance risks for businesses supporting cultural projects or institutions.

Potential Policy Change: Legal framework for philanthropy by individuals and businesses is defined. Namely, legislative changes provide for types of philanthropical support, key terms of philanthropy contracts, guarantees and stimuli for philanthropists.

Perspectives of the bill: High chances to be adopted since it is a government bill.

Why this is important: Using private capital to support Ukrainian culture should not be complicated and associated with risks.

What to do: In case your company is interested in supporting Ukrainian culture, check the Draft Law on whether it fully eliminates associated risks.



#international_trade #trade_investigations #WTO
DRAFT LAW 14270 ON IMPROVEMENT OF DOMESTIC PRODUCER PROTECTION 

Status Quo: The Trade Representative of Ukraine does not have a specific authority defined by law. Domestic producers lack support in trade investigations abroad.

Potential Policy Change: The Draft Law (DL) defines the authority of the Trade Representative. The Trade Representative and the Ministry of Economy have the authority to support domestic producers in trade investigations abroad. The DL provides for additional trade remedies by Ukraine particularly during martial law and two years onward.

Perspectives of the bill: High chances to be adopted since the bill is submitted by the chairman of the leading committee together with the large part of its key members. Also, the DL is supported by the Government.

Why this is important: As protectionist trends spread in international trade, Ukrainian producers (including German businesses manufacturing in Ukraine) need more vivid representation of their interests by the Government.

What to do: If you are involved in international trade and influenced by WTO law or trade investigations, and you consider that there are other ways the Ukrainian Government can offer support, please contact us. Now is the right time to advocate for it.



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