Ref. Ares(2026)10403317 - 06/11/2026

ANNEX C1: Twinning Fiche

EuropeAid/187959/DD/ACT/UA

Project title: Enhancing the institutional capacity of the Economic Security Bureau of Ukraine in combating currency counterfeiting through the implementation of the International Convention for the Suppression of Counterfeiting Currency, signed in Geneva on 20 April 1929, and EU *acquis*.

Beneficiary administration: Economic Security Bureau of Ukraine

Twinning Reference: UA 24 UF JH 01 26

Publication notice reference: *The publication notice reference will be completed by the European Commission*

EU funded project

TWINNING TOOL

List of Abbreviations

ESBU	Economic Security Bureau of Ukraine
NCO	National Central Office
NAC	National Analysis Centre
CNAC	Coin National Analysis Centre
ECB	European Central Bank
NBU	National Bank of Ukraine
NCP	Europol National Contact Point
MoJ	Ministry of Justice of Ukraine
OPG	Office of the Prosecutor General
SID NPU	Strategic Investigations Department of the National Police of Ukraine
NPU	National Police of Ukraine
MIA	Ministry of Internal Affairs of Ukraine
SSRFC MIA	State Scientific Research Forensic Center of the Ministry of Internal Affairs of Ukraine

1. Basic Information

1.1 Programme: Technical Cooperation Facility (TCF) 2024 (OPSYS reference: UAFacility/2024/ACT-62766, direct management)

The legal basis of this procedure is Regulation (EU) 2024/792 of the European Parliament and of the Council of 29 February 2024 establishing the Ukraine Facility: https://eur-lex.europa.eu/eli/reg/2024/792/oj/eng, rules on nationality and origin are defined in Article 11 of the Ukraine Facility Regulation.

1.2 Twinning Sector: JH – Justice and home affairs.

1.3 EU funded budget: EUR 1,500,000

1.4 Sustainable Development Goals (SDGs):

SDG 16. Peace, justice and strong institutions

Target 16.4 – By 2030, significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime

Target 16.a – Strengthen relevant national institutions, including through international cooperation, for building capacity at all levels, in particular in developing countries, to prevent violence and combat terrorism and crime.

2. Objectives

2.1 Overall Objective(s):

The overall objective of this Twinning project is to support the implementation of Ukraine's international obligations on aligning its institutional structure and legal regulation in the field of combating currency counterfeiting with international and EU standards.

2.2 Specific objective:

The specific objective of this Twinning project is to build a National Central Office (NCO) on combating currency counterfeiting as a unit capable of effectively functioning within the network of the EU member-states NCOs', engaging with Europol and competent Ukrainian authorities.

2.3 The elements targeted in strategic documents i.e. National Development Plan/Cooperation agreement/Association Agreement/Sector reform strategy and related Action Plans

The Rule of Law Roadmap, adopted by the Cabinet of Ministers of Ukraine by its resolution dated May 14, 2025, № 475-r, envisages main obligations of Ukraine under the negotiating chapter 24 "Justice, freedom and security". In the sphere of Economic crimes Ukraine should develop and adopt a law aimed at ratifying the International Convention for the Suppression of Counterfeiting Currency, signed in Geneva on April 20, 1929, as well as develop and adopt a law aimed at implementing the EU *acquis* in the field of counterfeiting currency. These draft laws were developed by the ESBU and in accordance with the Rule of Law Roadmap should be adopted by the IV quarter of 2026 by the Parliament of Ukraine.

In its Ukraine Report of November 04, 2025, within the 2025 Enlargement Package, the European Commission noted that the relevant legislation on the suppression of counterfeit

currency is partially aligned with the EU *acquis* and that Ukraine should step up its progress on the ratification of the Geneva Convention.

National Program for the Adaptation of Ukrainian Legislation to European Union Law (EU acquis), adopted by the Cabinet of Ministers of Ukraine by its resolution dated April 1, 2026, № 438, includes measure of implementation of the Council Regulation (EC) № 1338/2001 of 28 June 2001 laying down measures necessary for the protection of the euro against counterfeiting under the negotiating chapter 32 "Financial control".

Proper implementation of these measures encompasses the establishment of a central office withing the meaning of Article 12 of the Geneva Convention for international and domestic interinstitutional cooperation in the field of combating currency counterfeiting.

Given that Ukraine is not currently an EU member state, EU regulations do not automatically apply in Ukraine. Therefore, the national legislation should be adapted to the EU legislation in accordance with the European Commission recommendations and the Rule of Law Roadmap measures, and the national system of Ukraine on protection of euro from counterfeiting should be fully harmonised with the relevant EU member-states systems, and the National Central Office (NCO), established under Article 12 of the Geneva Convention, should become part of the EU member-states network of NCO's upon Ukraine's accession to the EU, ready to perform duties under the relevant EU regulations.

Bringing Ukraine's institutional system in the field of combating currency counterfeiting in line with the EU standards and practices will have a positive impact on euro protection in Ukraine and will prepare Ukraine to fulfil its EU accession obligations.

3. Description

3.1 Background and justification:

Currently in Ukraine both the legal and institutional framework on combating currency counterfeiting is not fully aligned with EU standards, which provide for establishment of a NCO, referred to in Article 12 of the Geneva Convention and in accordance with the Council Regulation (EC) № 1338/2001 of 28 June 2001 laying down measures necessary for the protection of the euro against counterfeiting.

The Economic Security Bureau of Ukraine

According to the ***Law of Ukraine "On the Economic Security Bureau of Ukraine"*** ESBU is a central executive authority tasked with combating offenses that affect the functioning of the state economy. ESBU activities are directed and coordinated by the Cabinet of Ministers of Ukraine.

The ESBU was established in 2021 as a first step of a broader reform on creating a single independent government agency, tasked with combating economic crime in Ukraine.

ESBU has law enforcement, analytical and informational functions.

One of the main tasks of the ESBU are ensuring the economic security of the state by preventing, detecting, stopping, and investigating criminal offenses that affect the functioning of the state's economy, collecting and analysing information about offenses that affect the economic security of the state, and determining ways to prevent their occurrence in the future.

To perform these tasks the ESBU is empowered to:

- carry out operational-search activities and pre-trial investigation within the scope of the jurisdiction of the ESBU;

- carry out information-search and analytical-information work to identify and eliminate the causes and conditions contributing to the commission of criminal offenses under the jurisdiction of the ESBU;
- carry out information interaction with state authorities, local self-government bodies, judicial authorities, other state authorities, enterprises, institutions and organizations, competent authorities of foreign states and international organizations;
- carry out searches for persons who are wanted by the pre-trial investigation bodies, the investigating judge, the court or are evading serving a criminal sentence for committing criminal offenses that are included by law in its jurisdiction;
- collect, process and analyse information on criminal offenses under the jurisdiction of the ESBU;
- carry out international cooperation with competent authorities of foreign states on the basis of laws and international treaties of Ukraine;
- form analytical materials to assess threats and risks of committing (increasing the number of) criminal offenses under the jurisdiction of the ESBU.

Currency counterfeiting is criminalised under the ***Criminal Code of Ukraine*** and is one of the crimes that detectives of the ESBU investigate according to the provisions of the ***Criminal Procedure Code of Ukraine.***

Under the ***Law of Ukraine "On operational-search activity"*** detectives and operatives of the ESBU are empowered to conduct criminal intelligence to detect crimes within the scope of the jurisdiction of the ESBU.

However, detectives of the ESBU in accordance with the abovementioned law have the power to involve operatives of other law enforcement agencies, for example NPU, to conduct criminal intelligence activities in currency counterfeiting cases.

Therefore, the main staff of the ESBU, involved in combating currency counterfeiting, includes:

- detectives, which are empowered to conduct *criminal intelligence, pre-trial investigation, international cooperation in criminal proceedings*
- operatives, which are empowered to conduct *criminal intelligence*
- analysts, which are empowered to conduct *criminal analysis*, based on information from databases, information resources etc.

The organisational structure of the ESBU includes Central Office, based in Kyiv, and 9 functioning territorial offices across Ukraine out of 24. Maximum staff number of the ESBU, determined in the law, is 4000, out of which approximately 1200 staff members are currently on active duty.

In the Central Office and all functioning territorial offices there are fully operational detectives, operative and analytical units, therefore ESBU has capacity to combat euro counterfeiting.

Main Detectives Division (as a Department), Department of Operational-Technical Activity, Department of Criminal Analysis and Strategic Protection of the Economy, Department of Information Analysis and Risk Management are the main structural units of the Central Office of the ESBU tasked with combating euro and other currencies counterfeiting.

Recent developments in the ESBUs' structure include establishment of the separate Division of Detectives for International and Special Investigations within the Central Office.

Other institutions involved in the combating of currency counterfeiting

National Bank of Ukraine (NBU)

The NBU and Ukrainian banks in accordance with the ***Law of Ukraine "On the National bank of Ukraine"*** are obliged to withdraw from circulation counterfeit banknotes and coins, including the euro ones.

The procedure for withdrawing such banknotes and coins is established by the NBU and governed by relevant regulations.

If a bank (branch, office), cash collection company/cash processing company detects foreign currency banknotes that are suspicious regarding their authenticity during the receiving, processing, or withdrawal of foreign currency, they are obliged to withdraw the banknotes from circulation and draw up and submit the relevant documents to the NBU for an investigation, which is free of charge (***NBU Board Resolution № 103 dated 25 September 2018***).

Credit institutions and other payment service providers are also obliged to ensure the authenticity of the euro banknotes and coins they receive and intend to return to circulation, and to detect counterfeits. A bank or a non-bank institution verifies the authenticity of foreign currency banknotes by using banknote counters/sorters with ultraviolet and infrared protection and magnetic control function and/or devices (detectors) that provide image magnification, visualization of ultraviolet and infrared protection and magnetic control (***NBU Board Resolution № 1 dated 2 January 2019***).

Regarding withdrawing counterfeits, the NBU regularly interacts with the ESBU, the Strategic Investigations Department of the National Police of Ukraine (SID NPU), expert institutions of the Ministry of Internal Affairs of Ukraine (MIA) of Ukraine and the MIA, the European Central Bank (ECB), and other central banks.

To ensure cooperation between the competent national authorities and exchange of information on preventing counterfeiting and suppressing the circulation of counterfeit banknotes and coins, including the euro, the following measures are taken:

- the NBU informs the ESBU in writing about euro banknotes recognized as counterfeit based on the examination results (*NBU Board Resolution № 103 dated 25 September 2018*)
- counterfeit euro banknotes are handed over at the request of the ESBU for examination (*NBU Board Resolution № 103 dated 25 September 2018*)
- the NBU also conducts examinations of the counterfeit banknotes at the request of law enforcement agencies (*NBU Board Resolution № 603 dated 25 September 2020*)
- the NBU and the State Scientific Research Forensic Center (SSRFC) of the MIA signed a permanent Agreement on the Exchange of Information on Counterfeit Banknotes and Coins (*NBU Board Resolution № K-3622 dated 12 January 2008*).

The NBU sends quarterly information (in electronic form) on counterfeit banknotes of the domestic and foreign currencies along with details, types of counterfeits, and locations of seizure withdrawn by NBU units to the SSRFC MIA, the ESBU and the SID NPU. The SSRFC MIA will provide quarterly information (in electronic form) on counterfeit banknotes of domestic and foreign currencies seized by the law enforcement.

In 2025, the NBU reported to the ECB on counterfeit euros withdrawn monthly from circulation in line with the Cooperation Agreement between the NBU and the ECB dated 25 May 2004. The NBU provides information according to a template set by the ECB indicating the dates of detecting counterfeits, their denominations, number of banknotes, serial numbers, types of counterfeits, etc.

The NBU receives information from the ECB regarding security features of euro banknotes and new types of discovered counterfeits.

In 2024, NBU experts were connected as users to the ECB's system for examining euro banknotes and analysing statistical data, the Counterfeit Monitoring System (CMS2).

In 2021 the NBU established the Center for Suppression of Counterfeit Banknotes and Coins, which conducts research, collects and analyzes technical and statistical data, and maintains databases of counterfeits, including euros (banknotes and coins), detected in circulation.

The main tasks of the Center for Suppression of Counterfeit Banknotes and Coins according to the *Regulation On the Center for Suppression of Counterfeit Banknotes and Coins of the National Bank of Ukraine*, approved by NBU Board Decision № 41 dated 27 January 2022, include the following:

- conducting examinations of suspicious foreign currency banknotes, including euro banknotes
- analysis of new types of counterfeit banknotes, including euros, found in circulation
- maintaining a database, preparing statistical and analytical materials on seized counterfeits, including euros
- carrying out trainings on the suppression of counterfeit banknotes and coins, including foreign currency
- cooperation with government and law enforcement agencies, banks, the European Central Bank, and other foreign central banks on the issues of counterfeit banknotes.

In Ukraine, the NBU Center for Suppression of Counterfeit Banknotes and Coins performs the functions of the National Analytical Center (NAC) and the Coins National Analysis Center (CNAC).

The NAC and the CNAC are planned to be established on the basis of the NBU Center for Suppression of Counterfeit Banknotes and Coins.

In March 2025 the NBU and the ESBU signed a Memorandum explicitly providing for the cooperation between the two institutions in the field of combating currency counterfeiting taking into account provisions of the ***Council Regulation (EC) № 1338/2001 of 28 June 2001 laying down measures necessary for the protection of the euro against counterfeiting, Council Regulation (EC) № 1339/2001 of 28 June 2001 extending the effects of Regulation (EC) № 1338/2001 laying down measures necessary for the protection of the euro against counterfeiting to those Member States which have not adopted the euro as their single currency, Directive 2014/62/EU of the European Parliament and of the Council of 15 May 2014 on the protection of the euro and other currencies against counterfeiting by criminal law, and replacing Council Framework Decision 2000/383/JHA***.

Office of the Prosecutor General (OPG) in accordance with the Criminal Procedure Code of Ukraine supervises investigations of currency counterfeiting, conducted by the ESBU detectives and acts as a central office of Ukraine in the pre-trial stage of criminal proceedings in the matters of international cooperation in these criminal proceedings. Official requests for international assistance to foreign competent authorities in criminal cases on a pre-trial stage are submitted by the detectives of the ESBU solely through the OPG.

Ministry of Justice of Ukraine (MoJ) in accordance with the Criminal Procedure Code of Ukraine acts as a central office of Ukraine in the trial stage of criminal proceedings in the

matters of international cooperation in these criminal proceedings. Official requests for international assistance to foreign competent authorities in criminal cases on a trial stage are submitted by the detectives of the ESBU solely through the MoJ.

Europol National Contact Point (NCP) in accordance with the ***Agreement on Operational and Strategic Co-operation between Ukraine and the European Police Office*** on operational and strategic partnership Ukrainian Europol NCP was established within the structure of National Police. Requests for police cooperation form and to the EU member-states competent police authorities are transmitted through the NCP. However, the ESBU detectives also use SIENA for direct cooperation with EU member-states competent police authorities.

Justification

Considering the ESBU's central role in detecting and investigating cases of currency counterfeiting in criminal proceedings, its powers of international cooperation in criminal proceedings, NCO is to be established within the ESBU and therefore it is the only beneficiary under this Twinning project.

Adoption of the law on Accession of Ukraine to the Geneva Convention will lead to the obligation to establish a central office in accordance with article 12 of the Convention regardless of the requirement under the EU regulation.

However, articles 2(b) and 8 of the Council Regulation (EC) № 1338/2001 laying down measures necessary for the protection of the euro against counterfeiting provide for the establishment in each EU member-state a national central office for gathering data relating to counterfeiting of the euro and submitting them to analysis in accordance with article 12 of the Geneva Convention and to ensure that, as soon as any case of counterfeiting is detected, information at national level is communicated to the national central office with a view to its being forwarded to Europol through the Europol national unit.

Therefore, the Twining project will support the ESBU in establishing NCO by providing necessary expertise on practical interaction of the NCO with the Europol national unit, NCO's of other jurisdictions, NAC and CNAC, which would also involve, where necessary, drafting amendments to national legislation and memorandums of cooperation/joint regulations of competent authorities to promote capacity building of the Ukrainian NCO and its functions in accordance with best European practices.

3.2 Ongoing reforms:

The ESBU in accordance with the Rule of Law Roadmap developed a draft Law on Ukraine's accession to the International Convention for the Suppression of Counterfeiting Currency, signed in Geneva on April 20, 1929, and the Protocol thereto, and a draft Law on Amendments to the Criminal and Criminal Procedure Codes of Ukraine in connection with Ukraine's accession to the International Convention for the Suppression of Counterfeiting Currency, signed in Geneva on April 20, 1929, and the Protocol thereto.

Amendments to the Criminal and Criminal Procedure Codes of Ukraine provide for the implementation into national legislation of provisions on the criminalization of counterfeiting of currency (including the euro) in accordance with the standards set by the International Convention for the Suppression of Counterfeiting Currency and Directive 2014/62/EU of the European Parliament and of the Council of 15 May 2014 on the protection of the euro and other currencies against counterfeiting by criminal law, and replacing Council Framework Decision 2000/383/JHA (Directive 2014/62/EU).

On 16.03.2026 draft laws were submitted by the ESBU to the Ministry of Foreign Affairs of Ukraine.

In accordance with the requirements of the Law of Ukraine "On International Treaties of Ukraine", the Ministry of Foreign Affairs of Ukraine on 28.05.2026 submitted draft laws developed by the ESBU to the President of Ukraine, who in turn submits draft laws for consideration to the Parliament of Ukraine (Verkhovna Rada of Ukraine).

The draft law on Ukraine's accession to the International Convention for the Suppression of Counterfeiting Currency, signed in Geneva on April 20, 1929, and Protocol thereto contains a declaration of Ukraine, according to which, in accordance with Article 12 of the International Convention for the Suppression of Counterfeiting Currency, *Economic Security Bureau of Ukraine (ESBU) is designated as the central office.*

The broader context of reforms in the sphere of economic crime involves actions being taken by the ESBU in accordance with the ***Rule of Law Roadmap and the Overarching Strategy on Law Enforcement Reform and its Action Plan (OAS AP),*** such as:

- Developing and adopting a law aimed at strengthening the analytical capacity of the ESBU, defining the ESBU as a central executive agency with special status to ensure effective implementation of guarantees of its independence
- Conducting attestation of employees of the ESBU within 18 months from the date of appointment to the position of Director of the ESBU
- Establishing 15 territorial divisions of the ESBU across the country's regions
- Strengthening the capacity, including human resources, of ESBU
- Implementing a unified data system for the ESBU.

With a view of enhancing its institutional capacity and adapting functional priorities of the ESBU to the implementation of the European standards recently the ESBU underwent internal structural reorganisation.

The most relevant to these Twinning Fiche is the establishment of a separate Division of Detectives for International and Special Investigations within the Central Office. Main tasks of this Division include international cooperation in criminal cases, conducting international financial investigations and asset recovery in foreign jurisdictions.

Therefore, functions of the NCO are planned to be assigned to the Division of Detectives for International and Special Investigations.

Currently there are no staff in the newly created Division of Detectives for International and Special Investigations, however staff from the Unit for International Cooperation Facilitation in Criminal Cases of the Main Detectives Division are planned to be transferred to this Division and staff recruitment procedures to this Division will also be launched.

3.3 Linked activities:

From June 9 to 14, 2025, a delegation of the ESBU took part in the seminar on protection of euro in Ukraine, organised by the European Commission in Brussels, Kingdom of Belgium.

Ukrainian delegation also included representatives of the NBU, the NPU, the OPG, and the MoJ. The seminar was organized by the European Commission in cooperation with EU institutions and Member States within the framework of the **PERICLES IV program**.

The event was attended by representatives of the European Commission (DG ECFIN), the ECB, Europol, Eurojust, as well as competent authorities of the EU Member States responsible for preventing and combating currency counterfeiting (central banks and law enforcement agencies).

During the seminar, representatives of the Ukrainian delegation made a presentation on the role of national authorities in combating euro counterfeiting and the state of implementation of European standards in this sphere.

European Commission representatives were informed on identified gaps in the criminal legislation of Ukraine, which does not fully comply with the requirements of Directive 2014/62/EU and the Geneva Convention, and the draft laws, developed by the ESBU on amendments to the Criminal Code and the Criminal Procedure Code of Ukraine and on accession of Ukraine to the Geneva Convention were presented, according to which the ESBU is designated as NCO.

EU member-states representatives presented functioning of the NCO, NAC and CNAC in different EU jurisdictions, the mechanisms of their interaction with the ECB, Europol, the European Commission and national law enforcement agencies. Particular attention was paid to the provisions of Regulation № 1338/2001, in particular the obligation to collect and transmit information to the ECB, the obligations of banking institutions to withdraw suspicious money from circulation, and the role of central offices in ensuring information exchange with Europol.

3.4 List of applicable *Union acquis*/standards/norms:

- Directive 2014/62/EU of the European Parliament and of the Council of 15 May 2014 on the protection of the euro and other currencies against counterfeiting by criminal law, and replacing Council Framework Decision 2000/383/JHA

- Council Regulation (EC) № 1338/2001 of 28 June 2001 laying down measures necessary for the protection of the euro against counterfeiting

- Council Regulation (EC) № 1339/2001 of 28 June 2001 extending the effects of Regulation (EC) № 1338/2001 laying down measures necessary for the protection of the euro against counterfeiting to those Member States which have not adopted the euro as their single currency

3.5 Components and results per component

Component 1 – Alignment of NCO's interinstitutional cooperation framework with EU's standards

Within this Component, the Twinning project team will support the revision of relevant laws and regulations based on the conducted gap analysis with a view to safeguard effective NCO cooperation with the NBU (future NAC and CNAC), law enforcement agencies in Ukraine, the Europol NCP, NCOs in foreign jurisdictions, other relevant authorities.

In the context of the Component 1 the following results will be achieved:

1.1. Developed list of measures to be taken to align relevant laws and regulations on NCOs' functioning and interinstitutional cooperation according to the best EU practices, EU regulations and Geneva Convention requirements.

1.2. Draft legal acts, regulations, joint regulatory or administrative directives of competent authorities are prepared according to the best EU practices, EU regulations and Geneva Convention requirements.

Component 2 – Definition of NCO internal operational parameters

Within this Component, the Twinning project team will provide recommendations on the draft internal regulatory documents, that will govern NCO's work, operating methods of NCO and its interaction with relevant ESBU units.

In the context of the Component 2 the following results will be achieved:

2.1. Recommendations provided on the sufficient staff necessary for effective performance of duties of NCO.
2.2. Recommendations provided on the internal regulatory documents, that will govern NCO's work.
2.3. Recommendations provided on the internal methodologies for cooperation of NCO with relevant ESBU units to perform functions in accordance with the EU regulations and Geneva Convention requirements.

Component 3 – Support in the capacity building of the NCO

NCO functions and practical ways of their performance will be new to the staff members of the newly created ESBU Division of Detectives for International and Special Investigations. Therefore, it is crucial to implement the best European practice on currency counterfeiting data collection and exchange of such information with relevant authorities.

The first part of the support will be devoted to the design of operational standards for all staff of the NCO. The second part of the support will be specialised trainings and expert exchange.

In the context of the Component 3, the following results will be achieved:

3.1. The NCO's staff trained on the role of the NCO as a competent body for interagency cooperation on currency counterfeiting in Ukraine and centralisation of information at national level.
3.2. The NCO's staff trained on the role of the NCO as a competent body for international information exchange on between the NCO and the Europol national unit, NCOs in foreign jurisdictions.
3.3. The NCO's staff trained on compliance with information safety standards for information exchange on currency counterfeiting.
3.4. All the employees of the NCO have basic knowledge of the EU regulatory practice (both general awareness and job-specific knowledge) and are able to cooperate with experts from NCOs of the EU member-states at the required level of knowledge.

3.6 Means/input from the EU Member State Partner Administration(s)*:

The project will be implemented in the form of a Twinning Contract between the Beneficiary Country and the EU Member State(s). The implementation of the project requires one Project Leader (PL) with responsibility for the overall coordination of project activities and one Resident Twinning Adviser (RTA) to manage implementation of project activities, Component Leaders (CL) and a pool of short-term experts (STE) within the limits of the budget. It is essential that the team has sufficiently broad expertise to cover all areas included in the project description.

Proposals submitted by Member State(s) shall be concise and focused on the strategy and methodology and an indicative timetable underpinning this, the administrative model suggested, the quality of the expertise to be mobilised and show clearly the administrative structure and capacity of the Member State entity/ies. Proposals shall be detailed enough to respond adequately to the Twinning Fiche but are not expected to contain a fully elaborated project. They shall contain enough detail about the strategy and methodology and indicate the sequencing and mention key activities during the implementation of the

project to ensure the achievement of overall and specific objectives and expected results/outputs.

The interested Member State(s) shall include in their proposal the CVs of the designated Project Leader (PL) and the Resident Twinning Adviser (RTA), as well as the CVs of the potentially designated Component Leaders (CLs).

The Twinning project will be implemented by close cooperation between the partners aiming to achieve the Expected results in a sustainable manner.

The set of proposed activities and indicators will be further developed with the Twinning partners when drafting the initial work plan and successive rolling work plan every three months, keeping in mind that the final list of activities will be decided in cooperation with the Twinning partners.

Due to security reasons the project is expected to be implemented in a 'hybrid' mode (combining online and offline events and means of collaboration). In line with the flexibility arrangements for the implementation of Twinning projects in Ukraine, RTA and short-term experts may be allowed to work from their home country(ies) using the videoconferencing facilities. The decision on the format of implementation of the twinning project is to be taken by the implementing partners according to security situation in the country and security policies, rules and procedures of the implementing partners. The exact arrangement shall be agreed in the work plan, with the overall assumption that the remote work contributes to the successful implementation of the project. If the security situation changes after the conclusion of the contract, the project format may be changed to a standard offline implementation arrangement.

3.6.1 Profile and tasks of the PL:

Successful implementation of a Twinning project requires the involvement of two Project Leaders appointed in the Member State on the one hand (Member State Project Leader) (MS PL) and a Project Leader of the beneficiary on the other hand (Beneficiary Country Project Leader) (BC PL).

The Twinning partner MS PL will act as a partner of the BC PL, and they will together closely cooperate to provide the overall management and coordination of the project.

The MS PL should be an official or equivalent agent with an appropriate level/experience to ensure operational dialogue at political level throughout the implementation period. He/she manages the implementation of the Twinning project and officially signs off on all work plans and/or any updates to this implementation.

The Twinning partner EU MS PL must have a good understanding of operation of EU national competent authorities and EU agencies/institutions in the field of protection of euro against counterfeiting. He/she must also have good project management skills and experience to address any issues that may arise during the project, such as the need for possible adjustments to adapt the Twinning Partner's approaches to the needs of the NCO, and to ensure that the project goals, objectives and deliverables are met and to facilitate their implementation.

The MS PL is expected to devote at least 4 days per month to the project in his/her home administration. In addition, he/she will coordinate, on behalf of the Member States, the Project Steering Committee (PSC), which will meet online or in person at least once every three months.

The MS PL must meet the following requirements (qualifications and skills):

- confirmed contractual relationship with a public administration or competent authority (see Twinning manual 4.1.4.2) which is entrusted with the functions of the NCO;

- university degree in one of the fields: law, economics, finance; or at least 8 years of equivalent professional experience;

- at least 3 years of professional experience in the field of law enforcement in the area of protection of euro against counterfeiting;

- previous experience in project management or as a team leader will be considered an asset;

- previous experience in international cooperation will be considered an asset;

- previous experience in change management will be considered an asset;

- experience in implementing at least one Twinning projects will be considered an asset;

- fluency in English, both written and oral;

- excellent management and communication skills.

The main tasks of the MS PL are:

- project management together with the BC PL;

- overall coordination and control of the Twinning project;

- assuring the quality and timely implementation of the planned activities, and achievement of the mandatory results;

- coordinate MS experts' work and availability;

- communicate with the EUD;

- monitoring and evaluation of project risks, project progress against the project budget, benchmarks and results;

- ensure the backstopping functions and financial management jointly with the BC PL, co-chairing the Project Steering Committee (PSC) and participating in its meetings;

- participate in the preparation of the initial and subsequent work plans, as well as in the preparation of interim and final reports.

3.6.2 Profile and tasks of the RTA:

The Resident Twinning Adviser (RTA) will be appointed by the administration(s) of the partner country or their competent authority. He/she will be seconded to Ukraine for a period of 24 months, during which he/she will be responsible for the direct implementation of the project under the general supervision of the MS PL. The RTA will work in the office space provided by the Economic Security Bureau of Ukraine (24 months). The RTA will be responsible for coordinating all activities planned under the Twinning.

The RTA must meet the following requirements (qualifications and skills):

- proven contractual relationship with a public administration or mandated body (see Twinning Manual 4.1.4.2) which is entrusted with the functions of the NCO;

- university degree in one of the fields: law, economics, finance; or at least 8 years of equivalent professional experience;

- at least 3 years of professional experience in the field of law enforcement in the area of protection of euro against counterfeiting specifically within the EU member-state NCO contributing to the smooth discharge of its functions;

- experience in implementing at least one international or EU-funded project of a similar nature; such experience in Twinning projects will be considered an asset;

- fluency in English, both written and oral;

- excellent communication, coordination and reporting skills.

The main tasks of the RTA are as follows:

- participate in drafting the work plan and deliverables of the Twinning project;

- oversee the daily implementation of the Twinning project in the beneficiary country;

- provide technical advice and support to the ESBU in the context of the pre-defined work plan;

- coordinate and monitor the project implementation, assessing risks that may arise and providing proposals for necessary corrective action;

- liaise with the ESBU on a daily basis and facilitate effective interaction and communication between the Twinning partners;

- manage a team of short-term experts, providing them with guidance, and supervising their performance and results;

- organise presentation events (kick-off and closing events);

- organise and participate in the Project Steering Committee (PSC) meetings;

- report to the Project Steering Committee (PSC) on the progress achieved;

- fulfil all necessary administrative functions.

In addition to the above, an assistant and a full-time translator-interpreter shall be appointed to assist the RTA. Allowance for this must be made within the project budget. Furthermore, the assistant and translator will facilitate the training activities. Where necessary (for example, during training activities, translation of project documents/reports and materials) the project may hire additional translators with costs covered by the project.

3.6.3 Profile and tasks of Component Leaders*:*

The Twinning project team includes 3 Component Leaders.

It will be considered an advantage if the EU Member State proposes Component Leader(s) who can manage more than one component.

The Component Leader is responsible for coordinating the activities within the component under the supervision of the RTA.

The main tasks of the Component Leaders are:

- interacting with the BC to provide effective support within the project and achieve specific deliverables of the component;

- provide technical advice and support to the ESBU in the context of the pre-defined work plan;

- planning the activities required to achieve the deliverables under the component;

- supervising short-term experts together with the RTA.

Each Component Leader must meet the following requirements (qualifications and skills):

- proven contractual relationship with a public administration or mandated body (see Twinning Manual 4.1.4.2) which is entrusted with the functions of the NCO;

- university degree in one of the fields: law, economics, finance; or at least 8 years of equivalent professional experience;

- at least 3 years of professional experience specific to the component;

- experience in implementing at least one international or EU-funded project of a similar nature; such experience in Twinning projects will be considered an asset;

- Previous experience in consulting, training and mentoring in related areas will be considered an asset;

- fluency in English, both written and oral;

- proactivity, analytical skills, and a good team player.

The main tasks of the Component Leaders are:

- interacting with the BC to provide effective support within the project and achieve specific deliverables of the component;

- provide technical advice and support to the ESBU in the context of the pre-defined work plan;

- planning the activities required to achieve the deliverables under the component; - supervising short-term experts together with the RTA.

3.6.4 Profile and tasks of other short-term experts*:*

The Twinning team will have a group of short-term experts (STEs) to provide specialised knowhow for the individual tasks of the project. It is estimated that the project will require at least 5 short-term experts of various profiles, specifically:

1. Conducting investigations on currency counterfeiting
2. Conducting investigative actions with foreign counterparts and providing mutual legal assistance in criminal cases of currency counterfeiting
3. Conducting forensic examination of counterfeit currency
4. Liaison with the Europol national units on the issues of currency counterfeiting
5. Liaison with the ECB on the issues of currency counterfeiting

Each STE must meet the following requirements:

- university degree in one of the fields: law, economics, finance; or at least 8 years of equivalent professional experience;
- at least 3 years of professional experience in the field of law enforcement in the area of protection of euro against counterfeiting specifically within the EU member-state NCO;

- previous experience in consulting, training and mentoring in the relevant field of expertise;
- fluency in English, both written and oral;
- experience in drafting legislation (regulations, guidelines, instructions) will be considered an asset;
- in-depth knowledge and understanding of the EU legislation, good practices in the field of protection of euro against counterfeiting will be considered an asset;
- hands-on experience in the relevant field of knowledge will be considered an asset.

The main tasks of short-term experts (STEs) are:

- cooperate with the Ukrainian partners on the implementation of all project activities;
- provide expert assistance and support to the ESBU in the areas and under the conditions specified in this Twinning Fiche;
- provide technical advice and support to the ESBU in the context of the pre-defined work plan;
- prepare additional materials if required for the activities necessary for the project implementation and achievement of its goals;
- fulfil the assignments of the RTA and respond to the requests and needs of the Ukrainian partners;
- prepare the necessary reports, including the final project performance report.

4. Budget

EUR 1,500,000

5. Implementation Arrangements

5.1 Implementing Agency responsible for tendering, contracting and accounting (AO/CFCU/PAO/European Union Delegation/Office):

The person in charge at the EU Delegation to Ukraine:
Ms Francesca Pavarini
Project Manager
Delegation of the European Union to Ukraine
101, Volodymyrska Street, Kyiv, Ukraine, 01033

The Delegation of the European Union to Ukraine together with the Twinning Programme Administration Office (PAO) will control the quality of all twinning documentation, check that the good financial management of the Twinning project is in compliance with EC rules, receive and examine all twinning project reports, support all twinning stakeholders, including beneficiary administration and Member States.

The person in charge at the PAO in Ukraine:
Twinning Programme Administration Office (PAO)
National Agency of Ukraine on Civil Service
15, Prorizna Street, Kyiv, Ukraine, 01033
Monitoring will be performed by the EU Delegation to Ukraine.

5.2 Institutional framework

The only beneficiary institution of this Twinning project is the ESBU. Specifically, the ESBU Division of Detectives for International and Special Investigations within the Central Office, to which functions of the NCO shall be assigned. Other ESBU structural units, which are involved in protection of euro against counterfeiting, shall also benefit from the regulation of their interaction with NCO, namely the Main Detectives Division

(as a Department), Department of Operational-Technical Activity, Department of Criminal Analysis and Strategic Protection of the Economy, Department of Information Analysis and Risk Management. The place of this structural units within the existing institutional structure of the ESBU is presented in the Annex.

Other stakeholders to be involved are the NBU, OPG, NPU and the MoJ.

Engagement of other institutions to be identified in the institutional mapping is envisaged.

The results of the project will not lead to a change of the institutional framework however it shall lead to the clear delineation of powers between relevant Ukrainian authorities on protection of euro against counterfeiting.

5.3 Counterparts in the Beneficiary administration:

The PL and RTA counterparts will be staff of the Beneficiary administration and will be actively involved in the management and coordination of the project.

5.3.1 Contact person:

Mrs. Iuliia Popadiuk
Acting Head of the Department of European Integration, International Cooperation, Strategic Partnership and Information Exchange
Economic Security Bureau of Ukraine
31 Sholudenka St., Kyiv, Ukraine, 04116

5.3.2 PL counterpart

Mr. Taras Shcherbai
First Deputy Director of the Economic Security Bureau of Ukraine
31 Sholudenka St., Kyiv, Ukraine, 04116

5.3.3 RTA counterpart

Mr. Irakli Katamadze
Acting Head of Division of Detectives for International and Special Investigations
Economic Security Bureau of Ukraine
31 Sholudenka St., Kyiv, Ukraine, 04116

6. Duration of the project

The project's implementation period is 24 months.

7. Management and reporting[1]

7.1 Language

The official language of the project is the one used as contract language under the instrument (English). All formal communications regarding the project, including interim and final reports, shall be produced in the language of the contract.

7.2 Project Steering Committee

[1] Sections 7.1-7.3 are to be kept without changes in all Twinning fiches.

A project steering committee (PSC) shall oversee the implementation of the project. The main duties of the PSC include verification of the progress and achievements via-à-vis the mandatory results/outputs chain (from mandatory results/outputs per component to impact), ensuring good coordination among the actors, finalising the interim reports and discuss the updated work plan. Other details concerning the establishment and functioning of the PSC are described in the Twinning Manual.

7.3 Reporting

All reports shall have a narrative section and a financial section. They shall include as a minimum the information detailed in section 5.5.2 (interim reports) and 5.5.3 (final report) of the Twinning Manual. Reports need to go beyond activities and inputs. Two types of reports are foreseen in the framework of Twining: interim quarterly reports and final report. An interim quarterly report shall be presented for discussion at each meeting of the PSC. The narrative part shall primarily take stock of the progress and achievements via-à-vis the mandatory results and provide precise recommendations and corrective measures to be decided by in order to ensure the further progress.

8. Sustainability

The Twinning project will support the ESBU in establishment and capacity building of the NCO, focusing on preparing necessary legislative and regulatory bases for the NCO's cooperation with relevant national authorities and foreign counterparts, promoting NCO's operational capacity and training its staff to effectively perform tasks, envisaged for the NCO in the Geneva Convention and EU regulations.

The achievements of a Twinning project (from results per component to impacts) should be maintained as a permanent asset to the Beneficiary administration even after the end of the Twinning project implementation. This presupposes inter alia that effective mechanisms are put in place by the Beneficiary administration to disseminate and consolidate the results of the project.

The twinning partners will undertake to provide the basic infrastructure necessary for the sustainability of their joint twinning achievements. The sustainability of the results is likely to be achieved if the twinning partners commit themselves to the following:

- absorbing efficiently the contents and understanding of the training materials by the Beneficiary personnel being measured and monitored after each training session that is provided by simple tests;

- making maximum use of the skills and abilities of the Beneficiary country administration personnel previously trained by Member States; apply "train the trainers approach" for sustainable capacity building of the Beneficiary administration;

- allowing for confirmation of the effect of the Twinning project for the Beneficiary administration by organising a final seminar that presents achieved results of the twinning activities at the end of the Twinning project;

- providing assurance that manuals and procedures developed within the Twinning project will be used by the Beneficiary beyond the primary contract period.

The success of the project will be based on achieving practical results and sustainability of the results will be an important measure of success.

9. Crosscutting issues *(equal opportunity, environment, climate etc…)*

The project implementation will be based on the principles of gender equality and non-discrimination. The project activities will be carried out in a way that encourages equal participation, regardless of gender, racial or ethnic origin, religion or belief, disability, age, political or sexual orientation.

Particular focus will be placed on equality in the design and conduct of staff training, site visits, and communication strategy to ensure that the identified target groups are reached in an equal and non-discriminatory manner.

No negative environmental impact is expected in the course of the Twinning project.

10. Conditionality and sequencing

The upcoming adoption of the law on Accession of Ukraine to the Geneva Convention is a prerequisite for the implementation of the Twinning project. That is why this project should focus on the implementation of the Geneva Convention and the relevant EU acquis, as well as on support to the establishing and capacity-building of the NCO, as this will contribute to a better application of the new legislative provisions.

11. Indicators for performance measurement

Please refer to Annex C1a – Logical Framework Matrix.

Mandatory result 1: Draft regulatory framework on NCO functioning and its interinstitutional cooperation aligned with the EU *acquis*.

Indicators:

1. List of measures developed based on gap analysis.
2. Legislative and/or regulatory documents drafted.

Mandatory result 2: NCO internal regulatory framework and operational parameters defined.

Indicators:

1. Recommendations and draft internal regulations on the NCO's functions developed.
2. Internal methodologies for structural units' cooperation with the NCO and SOPs of the NCO defined.

Mandatory result 3: NCO's capacity strengthened

Indicators:

1. Employees are trained.
2. First international information exchange on currency counterfeiting successfully conducted by the NCO.

12. Facilities available

The ESBU will provide the following facilities to accommodate the RTA and his/her assistants, visiting experts:

An office space, equipped with desks and shelves for documents, telephone, Wi-Fi and computers.

This office will be at the full disposal of the RTA and his/her team and visiting experts.

The office is located in a building managed by the ESBU. The building will have a permanent security service (during and outside of normal business hours) and will be secured by an alarm system outside of normal business hours. This office can be used for meetings and negotiations.
The ESBU will also provide a conference room, which will be available to the Resident Advisor and the Twinning team for meetings. This room can be used for training sessions, workshops, etc. This room will have technical equipment necessary for recording and playback of audio and video. The building also has a shelter that can be used in case of missile attacks.

ANNEXES TO PROJECT FICHE

1. The Simplified Logical framework matrix as per Annex C1a (compulsory)
2. List of relevant Laws and Regulations of Ukraine
3. Organisational Chart of the Economic Security Bureau of Ukraine (ESBU)

Annex C1a: Simplified Logical Framework

	Description	Indicators (with relevant baseline and target data)	Sources of verification	Risks	Assumptions (external to project)
Overall Objective	Implementation of Ukraine's international obligations on aligning its institutional structure and legal regulation in the field of combating currency counterfeiting with international and EU standards.	Improved cooperation and regulatory framework of national competent authorities on protection of euro against counterfeiting **Baseline:** 2026 – implementation of Ukraine's international obligations in the field of protection of euro against counterfeiting by means of criminal law is limited **Target:** By the end of project Ukrainian legal and regulatory framework on protection of euro against counterfeiting is better aligned with EU *acquis*	Report of the European Commission, official websites of the ESBU, other relevant national authorities	Impossibility to establish the NCO due to the associated political and economic factors.	Sufficient political support from the authorities on legislation adoption Sufficient budget financing allocated/financial assistance received
Specific (Project) Objective(s)	To build a NCO on combating currency counterfeiting as a unit capable of effectively	NCO established. Further alignment with the EU *acquis* on	Expert evaluations, reviews, analytical reports, SOPs, well	Impossibility to establish the NCO due to the	Sufficient political support from the

	functioning within the network of the EU member-states NCOs', engaging with Europol and competent Ukrainian authorities	institutional structure and mechanisms for protection of euro against counterfeiting **Baseline:** 2026 – NCO is not established due to the absence of legal grounds **Target:** By the end of project legal grounds for the NCO creation are established and NCO launched its operations in line with EU standards	trained staff who can participate in the EU regulatory network	associated political and economic factors. High dependence on international financial assistance for equipment of the NCO with necessary technical resources due to budgetary restrains	authorities on legislation adoption Sufficient budget financing allocated/financial assistance received
Mandatory results/outputs by components	***1. Draft regulatory framework on NCO functioning and its interinstitutional cooperation aligned with the EU acquis*** 1.1. Developed list of measures to be taken to align relevant laws and regulations on NCO's functioning and interinstitutional cooperation according to the best EU practices, EU regulations and Geneva Convention requirements.	1.1. List of measures developed based on gap analysis. **Baseline:** 2026 – no preliminary analysis of Ukrainian legislation conducted regarding possibility of NCO's functions performance	Expert evaluations, surveys, analytical reports, official updates on the adoption of draft laws/ regulations in accordance with the national procedure.	Martial law in Ukraine. Security situation disrupts project implementation Low support on promoting cooperation with competent national authorities (NBU, Europol NCP and others)	Full support on promoting cooperations with competent national authorities Hybrid work mode established to continue work

		in accordance with EU standards **Target:** List of specified legislative measures developed to address gaps in Ukrainian legislation on NCO's discharge of functions			
	1.2. Draft legal acts, regulations, joint regulatory or administrative directives of competent authorities are prepared according to the best EU practices, EU regulations and Geneva Convention requirements.	1.2. Legislative and/or regulatory documents drafted. **Baseline:** 2026 – no regulatory framework on NCO's functioning and its cooperation with relevant authorities **Target:** By the end of project regulatory framework necessary for NCO's effective discharge of functions is established			
	2. NCO internal regulatory framework and operational parameters defined		Expert evaluations, reviews, and draft documents (staffing charts, internal	Martial law in Ukraine. Security situation disrupts project	Hybrid work mode established to continue work

	2.1. Recommendations provided on the sufficient staff necessary for effective performance of duties of NCO 2.2. Recommendations provided on the internal regulatory documents, that will govern NCO's work	2.1. Staff recruitment to the unit performing NCO's functions conducted in line with recommendations **Baseline:** 2026 – no assessment of sufficient staffing conducted **Target:** By the end of the project NCO staffed in line with recommendations 2.2. Draft internal regulations on the NCO's functions developed. **Baseline:** 2026 – staff instructions and unit regulations do not include provisions of NCO functions **Target:** staff instructions and unit regulations are fully adapted to the NCO functions to clearly	regulations, SOPs, etc.).	implementation Impossibility to establish the NCO due to the associated political and economic factors.	Sufficient political support from the authorities on legislation adoption Sufficient budget financing allocated/financial assistance received

	2.3. Recommendations provided on the internal methodologies for cooperation of NCO with relevant ESBU units to perform functions in accordance with the EU regulations and Geneva Convention requirements.	and include clear instructions for staff as NCO officers 2.3. Internal methodologies for structural units' cooperation with the NCO and SOPs of the NCO defined. **Baseline:** 2026 – no internal regulatory framework on NCO's functioning within the ESBU structure is adopted **Target:** By the end of project necessary internal regulatory framework on NCO's functioning within the ESBU structure is established			
	3. NCO's capacity strengthened 3.1. The NCO's staff trained on the role of the NCO as a competent body for interagency cooperation on currency counterfeiting in Ukraine and	3.1. Employees of the NCO received relevant training.	Training records, expert evaluations, reviews, analytical reports, and draft documents (internal regulations, SOPs, etc.).	Training cannot be conducted abroad due to the legislation-imposed travel restrictions. Training cannot be	Trainings organised online and sufficient number of staff also can travel abroad. People to

	centralisation of information at national level. 3.2. The NCO's staff trained on the role of the NCO as a competent body for international information exchange on between the NCO and the Europol national unit, NCOs in foreign jurisdictions. 3.3. The NCO's staff trained on compliance with information safety standards for information exchange on currency counterfeiting.	**Baseline:** 2026 – no staff is trained **Target:** By the end of project all staff of the NCO is trained on NCO functions within Ukraine and NCO's cooperation with key Ukrainian agencies tasked with combating currency counterfeiting 3.2. Employees of the NCO received relevant training. **Baseline:** 2026 – no staff is trained **Target:** By the end of project all staff of the NCO is trained on NCO's international cooperation functions 3.2. Employees of the NCO received relevant training.		conducted in Ukraine due to security threats. The trained personnel does mot discharge its functions as the NCO not yet established.	participate in the trainings are currently employed by the Economic Security Bureau of Ukraine. Staff of the Unit for International Cooperation Facilitation in Criminal Cases of the Main Detectives Division is to be transferred to the newly created Division of Detectives for International and Special Investigations. Sufficient amount of new staff recruited by the Division of Detectives for International and Special Investigations

		Baseline: 2026 – no staff is trained **Target:** By the end of project all staff of the NCO is trained on safety standards for using relevant information systems and channels of exchange of information on currency counterfeiting			
	3.4. All the employees of the NCO have basic knowledge of the EU regulatory practice (both general awareness and job-specific knowledge) and are able to cooperate with experts from NCOs of the EU Member States at the required level of knowledge.	3.4. First international information exchange on currency counterfeiting conducted by the NCO with foreign counterparts according to established procedures. **Baseline:** 2026 – no practical case of direct exchange of information between Ukrainian NCO and foreign counterparts			

		Target: By the end of project NCO staff conducted practical exchanged of information with foreign counterparts according to established procedures			

ANNEX 2 List of relevant Laws and Regulations of Ukraine

Agreement on Operational and Strategic Co-operation between Ukraine and the European Police Office

Criminal Code of Ukraine

Criminal Procedure Code of Ukraine

Law of Ukraine “On the Economic Security Bureau of Ukraine”

Law of Ukraine “On Operational-Search Activity”

Law of Ukraine “On the National Bank of Ukraine”

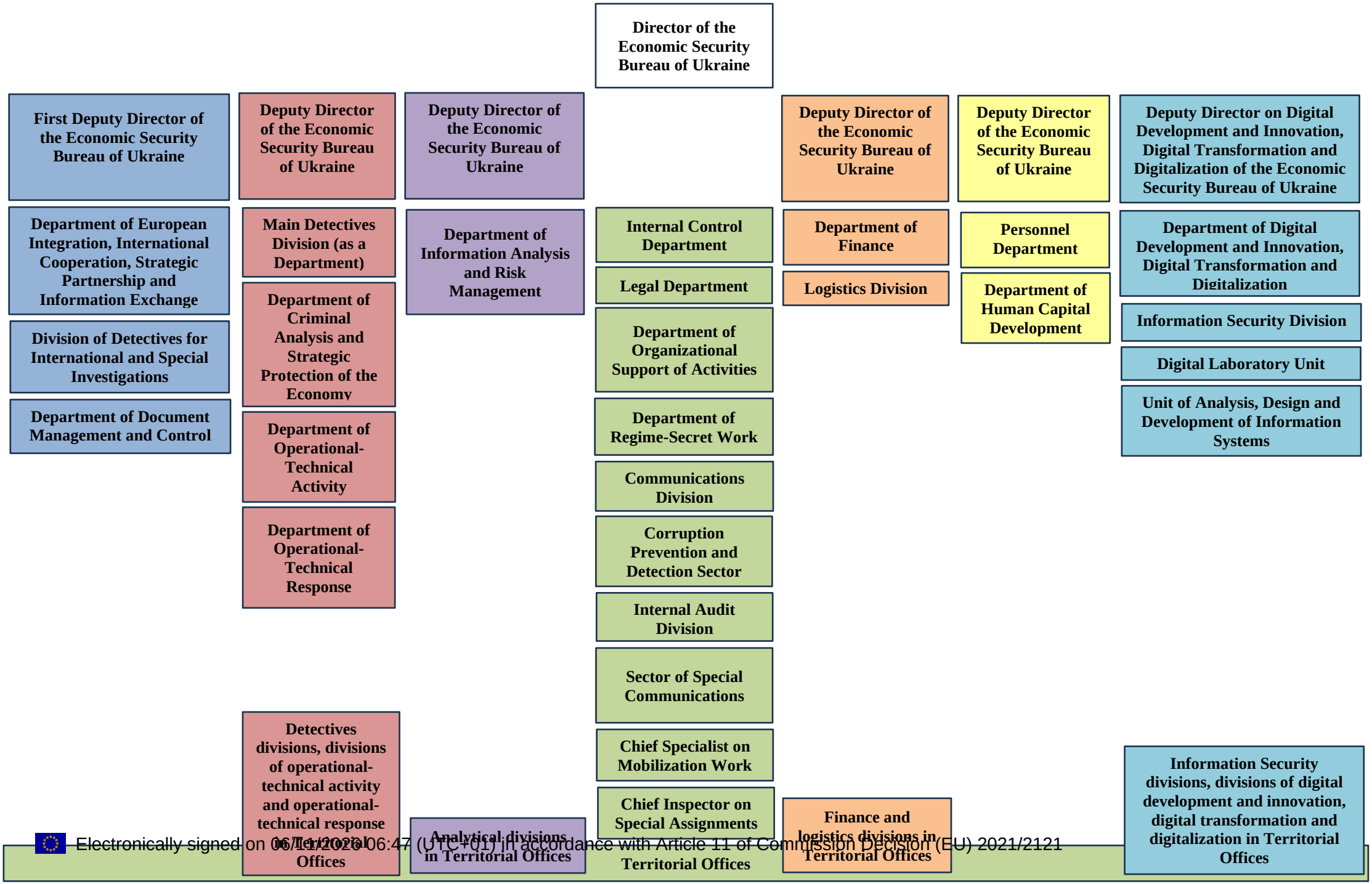
Law of Ukraine “On Currency and Currency Transactions”

Resolution of the Cabinet of Ministers of Ukraine of № 1068 date October 6, 2021 “On certain aspects of organization of activities of the Economic Security Bureau of Ukraine”

NBU Board Resolution № 103 dated September 25, 2018 “On approval of the Instructions on the procedure for organizing cash operations by banks and conducting payment transactions by payment service providers in Ukraine”

NBU Board Resolution № 1 dated January 2, 2019 “On approval of the Regulations on transactions with currency values”

ANNEX 3 Organisational Chart of the Economic Security Bureau of Ukraine (ESBU)



Electronically signed on 06/11/2023 06:47 (UTC+01) in accordance with Article 11 of Commission Decision (EU) 2021/2121