

Russian Ministry of Labour invites organisations to implement new anti-corruption recommendations

Russia · 04.11.2019

Available languages: [RU](#)

The Ministry of Labour and Social Protection has developed new recommendations on combating corruption in organisations, including [Measures to prevent corruption in organisations*](#), [Recommendations on the procedure for assessing corruption risks*](#) and a [Memo on the corruption-prevention duties of employees, liability and incentives for employees*](#) ("Recommendations").

The Recommendations are expected to help companies properly fulfil corruption-prevention obligations in accordance with article 13.3 of [Federal Law No. 273-FZ "On Combating Corruption" dated 24 December 2008*](#).

The Recommendations include measures aimed at minimising corruption risks for companies including those related to:

- the development of anti-corruption policies and standards;
- the settlement of conflicts of interest;
- interactions with employees;
- the building of an effective system for obtaining information on corruption offences; and
- interactions with law enforcement agencies.

The Ministry of Labour paid special attention to an algorithm for assessing corruption risks, which uses a company's risk profile to arrive at the specific measures that organisations need to put in place.

In addition, the Ministry of Labour recommends enshrining the obligations that employees should follow in order to combat corruption in their employment contracts. It also emphasises the importance of creating a system of employee incentives and sanctions within organisations. This system should be aimed at supporting anti-corruption standards and discouraging all forms of corruption.

It should be [remembered](#) that in 2013 the Ministry of Labour developed guidelines for anti-corruption. The new Recommendations do not formally cancel these earlier guidelines. Rather, the new Recommendations are more advanced and summarise current Russian and foreign law enforcement practices.

The responsibility to take measures to prevent corruption lies with all organisations, both private and public. If an organisation does not implement these measures, public prosecution authorities can issue an order to comply and failure to fulfil the order is punishable by an administrative fine of up to RUB 100,000 (EUR 1,400). In addition, an effective anti-corruption policy will significantly reduce the risk of an organisation and its employees committing corruption offences.

We recommend that companies implement the Ministry of Labour's Recommendations into their internal policies to help them fight corruption and reduce the corresponding risks to their legal status and reputation.

If you have any questions on this eAlert, do not hesitate to contact CMS Russia experts [Sergey Yuryev](#) and [Alexey Shadrin](#) or your regular contact at CMS Russia.

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