

Legal Alert

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The Russian Ministry of Labour issued additional guidance on anti-corruption compliance

The Russian Ministry of Labour ("**the Ministry**") issued three new sets of anti-corruption guidelines for companies:

1. "Measures for Preventing Corruption at Organizations"¹
2. "Memorandum on Establishing the Duties of Employees for Preventing Corruption, Employee Liability, and Incentive Programs"²
3. "Recommendations on the Procedure for Assessing Corruption Risks at Organizations"³

The new guidelines complement and extend previous recommendations of the Ministry concerning prevention of corporate corruption.

A company may avoid liability for public or private sector bribery under Article 19.28 of the Administrative Offences Code if it can prove that it has taken all possible measures to prevent this corrupt activity taking place. It is unlikely to be successful in this defense if it has not followed these latest guidelines (as well as the earlier recommendations of the Ministry).

This LEGAL ALERT is issued to inform Baker McKenzie clients and other interested parties of legal developments that may affect or otherwise be of interest to them. The comments above do not constitute legal or other advice and should not be regarded as a substitute for specific advice in individual cases.

¹ <https://rosmintrud.ru/uploads/magic/ru-RU/Ministry-0-106-src-1568817692.8748.pdf>

² <https://rosmintrud.ru/uploads/magic/ru-RU/Ministry-0-106-src-1568817742.8173.pdf>

³ <https://rosmintrud.ru/uploads/magic/ru-RU/Ministry-0-106-src-1568817604.7941.pdf>