

## **The Office of the Prosecutor General of the Russian Federation proposed exemption from administrative liability organizations reporting on corruption offenses and seizure of property as new preventive measures**

April 27, 2017

Dear Ladies and Gentlemen,

We would like to inform you that the Office of the Prosecutor General of the Russian Federation (hereinafter - the “**Prosecutor General Office**”) has prepared a number of amendments and suggestions in the field of counteracting corruption offences. Suggestions have been prepared pursuant to the instruction given by the Presidium of the Presidential Council for countering corruption.

One of the proposals is to exempt organizations reporting on corruption offenses revealed from administrative liability. Such rule will work similarly to the exemption from the criminal liability of persons reporting on bribery. As of the current moment, a company is fined for bribery, even if it’s representative has come to the police voluntarily and informed them on the bribe already given. According to the representatives of the Prosecutor General Office, such scenario does not create incentive for “positive social behavior”.

During last year, prosecutors initiated 450 cases connected with corruption offenses committed by legal entities; the amount of fines imposed on violators with respect to that cases amounted up to RUB 654 million. However, there are problems with collection of the fines: companies often start to withdraw and hide assets upon which execution of the fines could be levied. Therefore, the Prosecutor General Office is also working on amendments introducing new preventive measure for such cases –seizure of property of legal entities against which proceedings on corruption offences have been initiated.

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ALRUD lawyers have extensive experience in provision of comprehensive support to clients in all areas of law, including in support of cases related to corruption offences

ALRUD lawyers are ready to provide the necessary legal assistance on all issues related to the described offences, as well as elaboration of internal anti-bribery policies and procedures in the companies. ALRUD specialists also possess great experience in conduction of internal investigations of corruption matters and could support in case of investigations and inspections of bribery cases.

Hope that the information provided herein would be useful for you. If any of your colleagues would also like to receive our newsletters, please let us know by sending us his/her email address in response to this message. If you would like to learn more about our [White Collar Crime, Compliance and Internal Investigations practice](#), please let us know about it in reply to this email. We will be glad to provide you with our materials.

If you have any questions, please, do not hesitate to contact the Partner of ALRUD Law Firm [German Zakharov](#) at [gzakharov@alrud.ru](mailto:gzakharov@alrud.ru).

Kind regards,  
**ALRUD Law Firm**

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