



# Government-Business Dialogue on Combating Corruption

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1. Administrative responsibility of legal persons for «corruption offenses» was established in 2008 under Article 14 of “Federal Law on Combating Corruption” and in Article 19.28 of “Code of Administrative Offenses” (CAO).
2. «Anti-Corruption Charter» for businesses was signed in September 2012 by Russia business associations.
3. The legal requirement for companies to develop and implement anti-corruption measures was established under Article 13.3 of “Federal Law on Combating Corruption”.
4. Ministry of Labor and Social Protection was entrusted with the responsibility to develop together with leading business associations Methodological Guidelines for Organizations on the Development and Implementation of Anti-Corruption Measures.

Methodological Guidelines for Organizations on the Development and Implementation of Anti-Corruption Measures were prepared with participation of:

## Federal government bodies:

- Ministry of Labor and Social Protection
- Ministry of Economic Development
- Ministry of Justice
- Ministry of the Interior
- Investigative Committee

## Business associations:

- Russian Chamber of Commerce and Industry
- Russian Union of Industrialists and Entrepreneurs
- All-Russia business association «Business Russia»
- Small and medium business association «OPORA Rossii»

The aim of the Methodological Guidelines was to develop a unified approach to introduction of anti-corruption measures in organizations irrespective of property types, organizational and legal forms, professional focus and other features.

Business newspaper - RBC-Daily 18.11.2013

“Majority of big Russian companies has already implemented anti-corruption policies (Rus-Gidro, Rose Group, MegaFon, VimpelCom, MTS, Sberbank, Pochta Rossii).

## Goals of the Methodological Guidelines:

- ✓ to define the key principles of anti-corruption measures in organizations ;
- ✓ to provide methodological support for the development and implementation of anti-corruption measures in organizations;
- ✓ to provide a set of sample documents for practical use of these measures;
- ✓ to inform organizations of the existing anti-corruption rules and regulations, including legal responsibility for corruption offense.

# Basic Principles of Anti-Corruption Policy in Organizations:

- Compliance of the organization's policy with the existing legislation and rules;
- Senior leaders' exemplary behavior;
- Employees' personal involvement;
- Balance between anti-corruption measures and corruption risks;
- Efficiency of anti-corruption procedures;
- Responsibility and unavailability of punishment;
- Transparency of business;
- Constant control and regular monitoring.

# Set of Anti-Corruption Measures (six key strategies)

- I. Legal provision, behavior rules and declaration of interests:
  - Development and adoption of the ethics and work behavior code of the organization employees;
  - Development and introduction of a procedure on the settlement of the conflict of interests, including a declaration on the conflict of interests;
  - Development and adoption of measures regulating the exchange of business gifts and business hospitality signs
  - Joining the Anti-Corruption Charter of Russian Business
  - Introduction of a standard anti-corruption provisions into business agreements with partners
  - Introduction of anti-corruption provisions into employees' business contracts



# Set of Anti-Corruption Measures (six key strategies)

## II. Development and introduction of special anti-corruption procedures on:

- Notification of employers by employees on involving them in bribery offences. Development of a procedure for examining these cases, including creation of accessible channels for the transmission of this information (feed-back mechanisms, telephone of trust, etc.);
- Notification of employers by employees on corruption activities of other employees, business partners and other individuals;
- Notification of employers by employees on conflicts of interests and settlement of conflicts of interests;
- Protection of employees who would report on the organizations corrupt practices;
- Annual filling out of the declaration on the conflict of interests;
- Occasional evaluation of corruption risks aimed at identification of most vulnerable spheres in the organization's operations;

# Set of Anti-Corruption Measures (six key strategies)

## III. Employees' education and notification:

- Annual exposure of employees to legal documents regulating anti-corruption practices in organizations;
- Educational activities on anti-corruption;
- Individual consultations of employees on anti-corruption standards and procedures

# Set of Anti-Corruption Measures (six key strategies)

## IV. Provision of correlation of the organization's internal control and audit with the organization's anti-corruption policy:

- Regular control of the implementation of internal procedures, including financial audit;
- Regular control of economic relevance of expenditures in spheres with high corruption risks (exchange of business gifts, representation funds, charities, awards to external consultants).

# Set of Anti-Corruption Measures (six key strategies)

## V. Attracting Experts:

- Occasional independent audit;
- Independent anti-corruption experts

# Set of Anti-Corruption Measures (six key strategies)

## VI. Evaluation of anti corruption activities and distribution of reporting materials:

- Regular evaluation of the results of anti-corruption activities;
- Preparation and distribution of reporting materials on the results achieved in the anti-corruption sphere

# Ways of distribution of the Methodological Guidelines

Communication strategy focused on:

- Media;
- Independent Experts;
- Business associations and NGOs.

Monitoring:

- Sociological surveys;
- Judicial practice analyses;
- Media.