



Compliance practice survey results

Companies Circle

OECD Russia Corporate Governance Roundtable

List of respondents

List of respondents – members of the **Companies Circle**

1. ALROSA

2. AEROFLOT

3. BASHNEFT

4. Bank VTB

5. Inter RAO

6. LUKOIL

7. Norilsk Nickel

8. Russian Railways

9. Rostelecom

10. RusHydro

11. SBERBANK

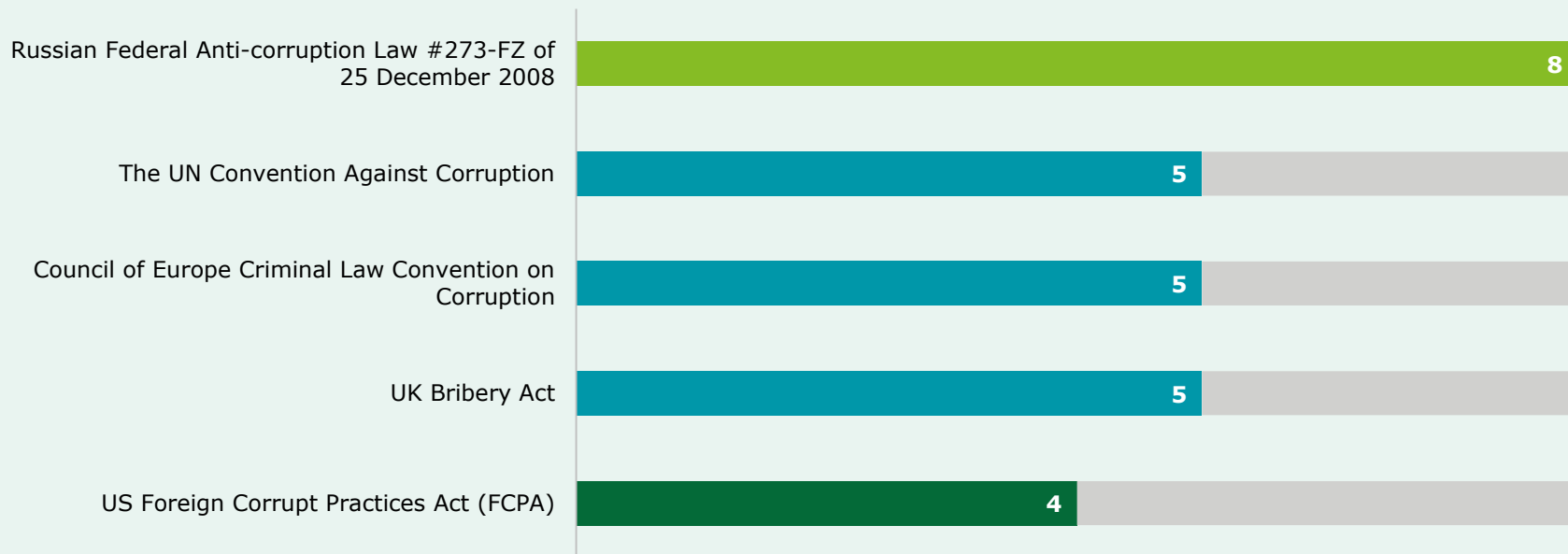
12. Transcontainer

**The questionnaire was sent to all members of the Companies Circle.
8 out of 12 companies – members of the Companies Circle answered these questions.**

1. General terms

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Anticorruption legislation the respondents' companies are guided by:

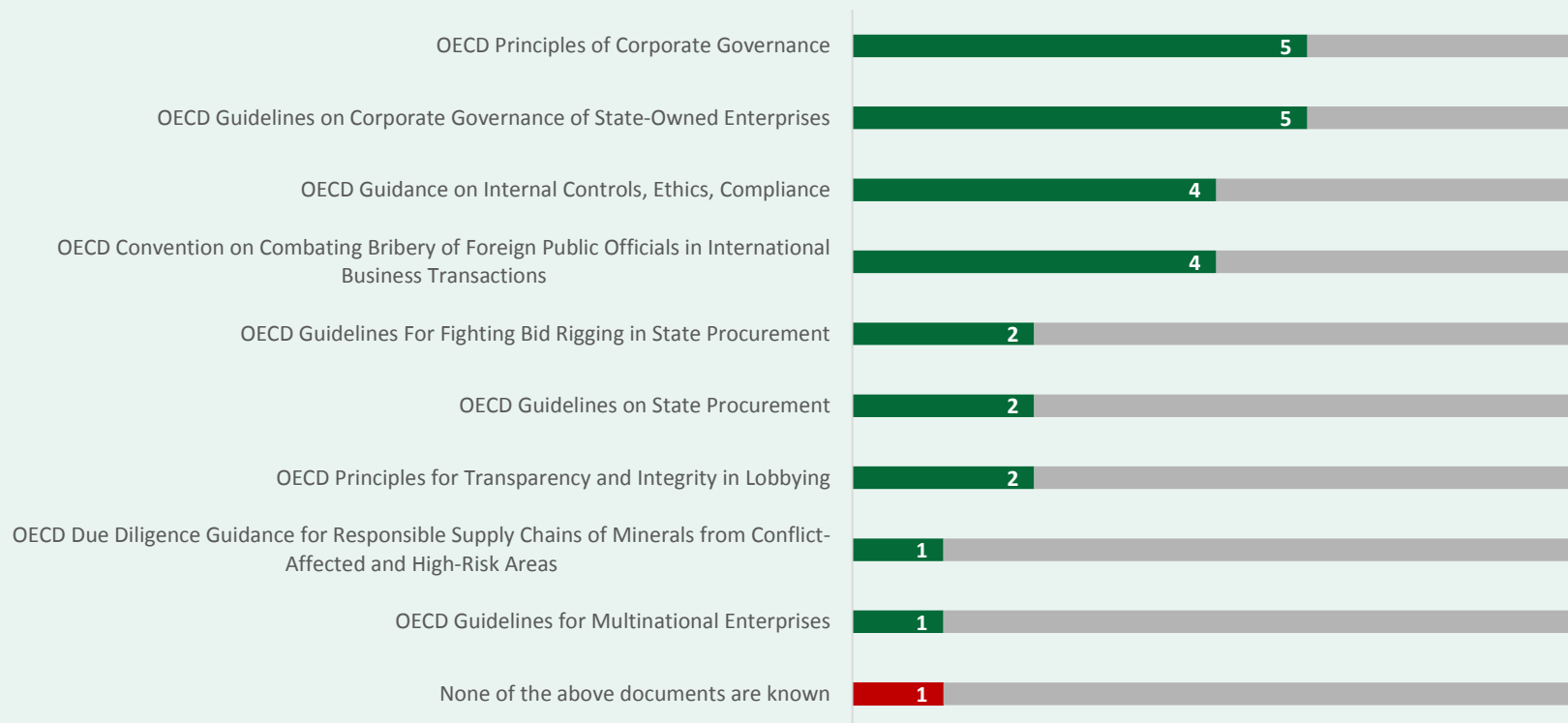


Among other documents, defining the company's activities in the area of anti-corruption, respondents noted the following:

The Constitution of the Russian Federation (RF), the Criminal Code of the RF, the Code Administrative Offences of the RF, National Anti-corruption Strategy, National Anti-corruption Plan for 2014-2015, and legal acts issued by the President of the RF and the Government of the RF.

1. General terms

OECD documents in the area of ensuring integrity in business known to respondents:



2. Company compliance function

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The company has a department or an employee responsible for compliance with internal policies and anti-corruption law:



7

companies have a compliance function represented by a department or employee

from **2013**
to **2016**

The year the compliance department was established varies among respondents



1

Company does not have a compliance function

The economic security department monitors compliance with internal policies and applicable anti-corruption law

2. Company compliance function

In companies with a dedicated compliance function, the responsible employee does the following work:



Other responsibilities noted by the respondents include:

- Control over the counteraction of money laundering and terrorism financing
- Participation in official inspections and investigations to identify violations of anti-corruption law and development of possible steps to address violations
- Development of a compliance culture

2. Company compliance function

Compliance procedures:



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respondents could not answer the question about internal assessment of corruption risks

1

company conducts internal assessments of corruption risks every year or as needed

4

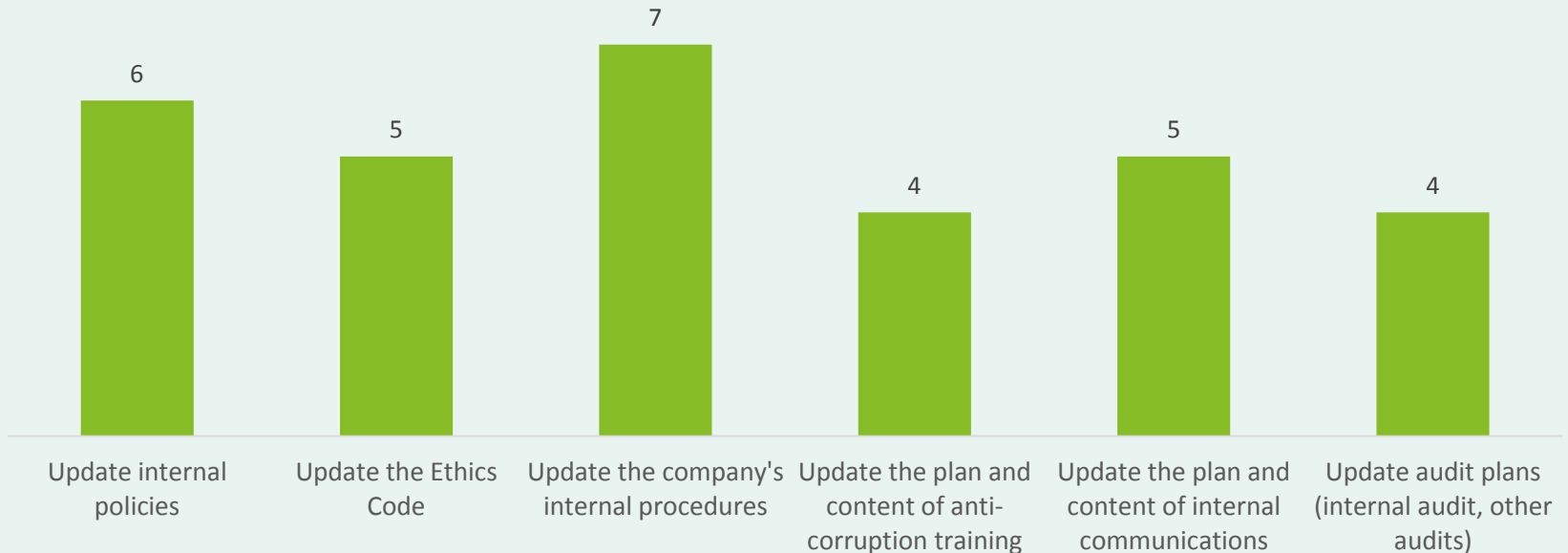
companies conduct internal assessments of corruption risks annually

2

companies conduct internal assessments of corruption risks as needed

2. Company compliance function

Results of the internal assessment of corruption risks are used in the following way:



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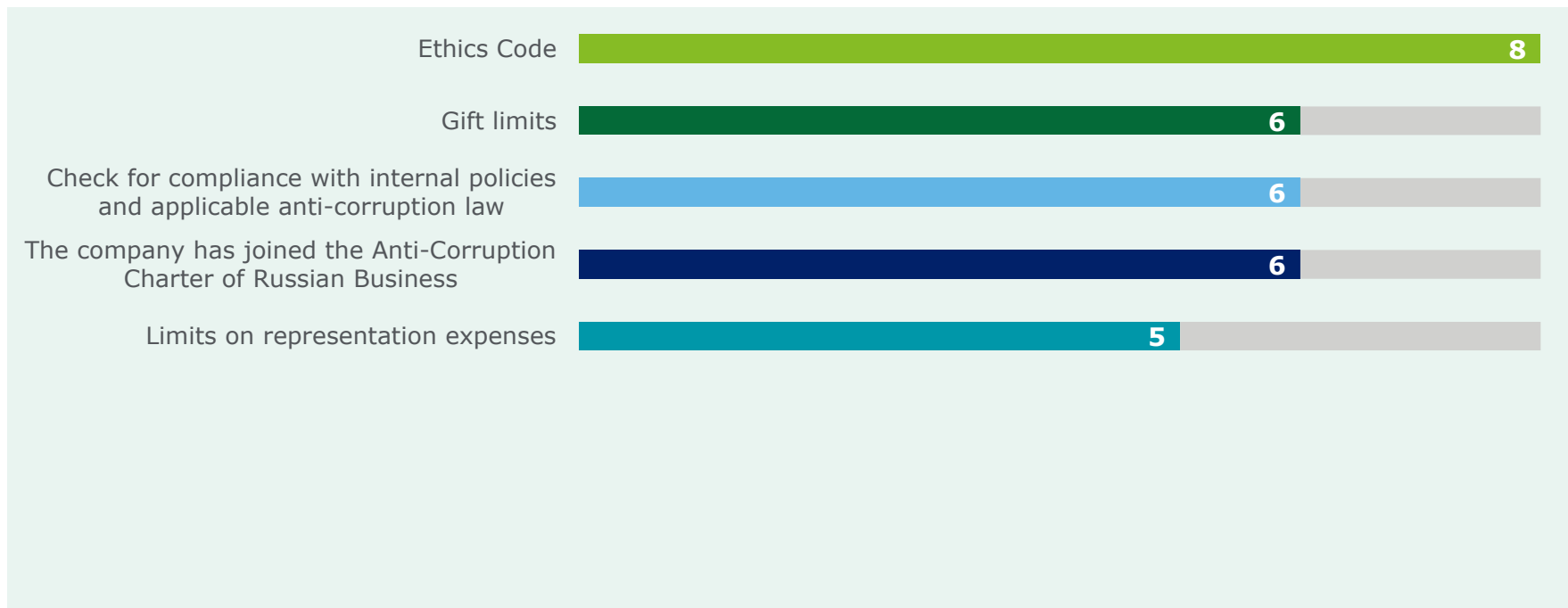
respondents could not answer the question

Other uses of the risk assessment results noted by the respondents:

- Improving the company's internal control system and carrying out investigations

3. Internal policies of the company

3. Internal policies of the company



₽ from 3000 to 4000
Limits on gifts indicated by respondents

1 respondent could not answer the question about compliance inspections

1 respondent could not answer the question about limits on representation expenses

3. Internal policies of the company

The following methods are used to familiarise staff with internal policies:

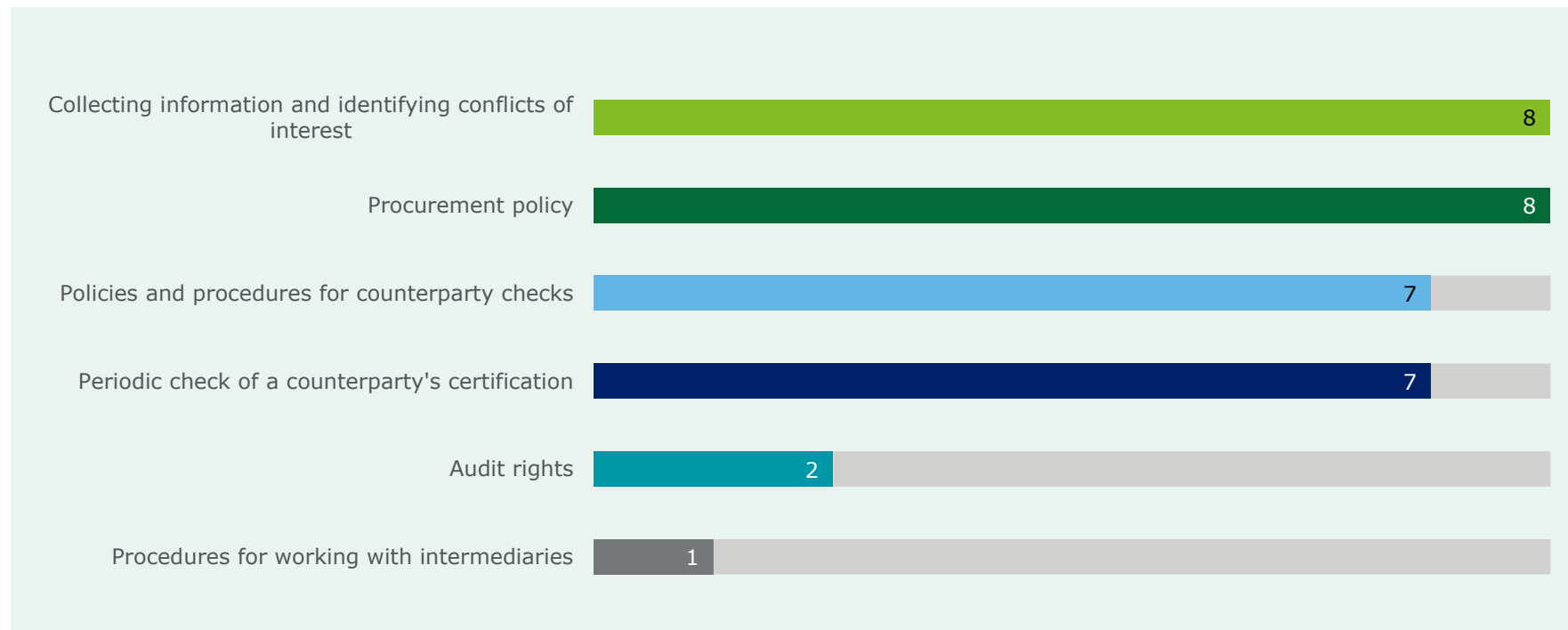


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companies have procedures to familiarise employees with the internal policies

4. Policies and procedures governing interaction with counterparties

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3

companies have counterparties checked by three departments depending on the nature of the inspection

4

respondents could not answer the question about the existence of a separate policy for working with intermediaries

3

respondents could not answer the question about audit rights

5. Participation in state procurement

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companies participate in state tenders, performing work and providing services under state contracts



5/7

companies do not have a separate policy for interacting with state companies and public officials

2/7

companies have a separate policy for interacting with state companies and public officials

6. Checks on employees

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Checks of employees to ensure that persons in executive positions were not involved in illegal activities or other violations of business practices:



6

companies conduct checks of employee personal data



2

respondents could not answer the question about personal data checks

7. Employee training on compliance

7. Employee training on compliance

Compliance training:

Employee compliance training is held timely

6

Compliance training is sufficient

6

4

companies, hold training on an annual basis

1

respondent could not answer the question about compliance training in the company

2

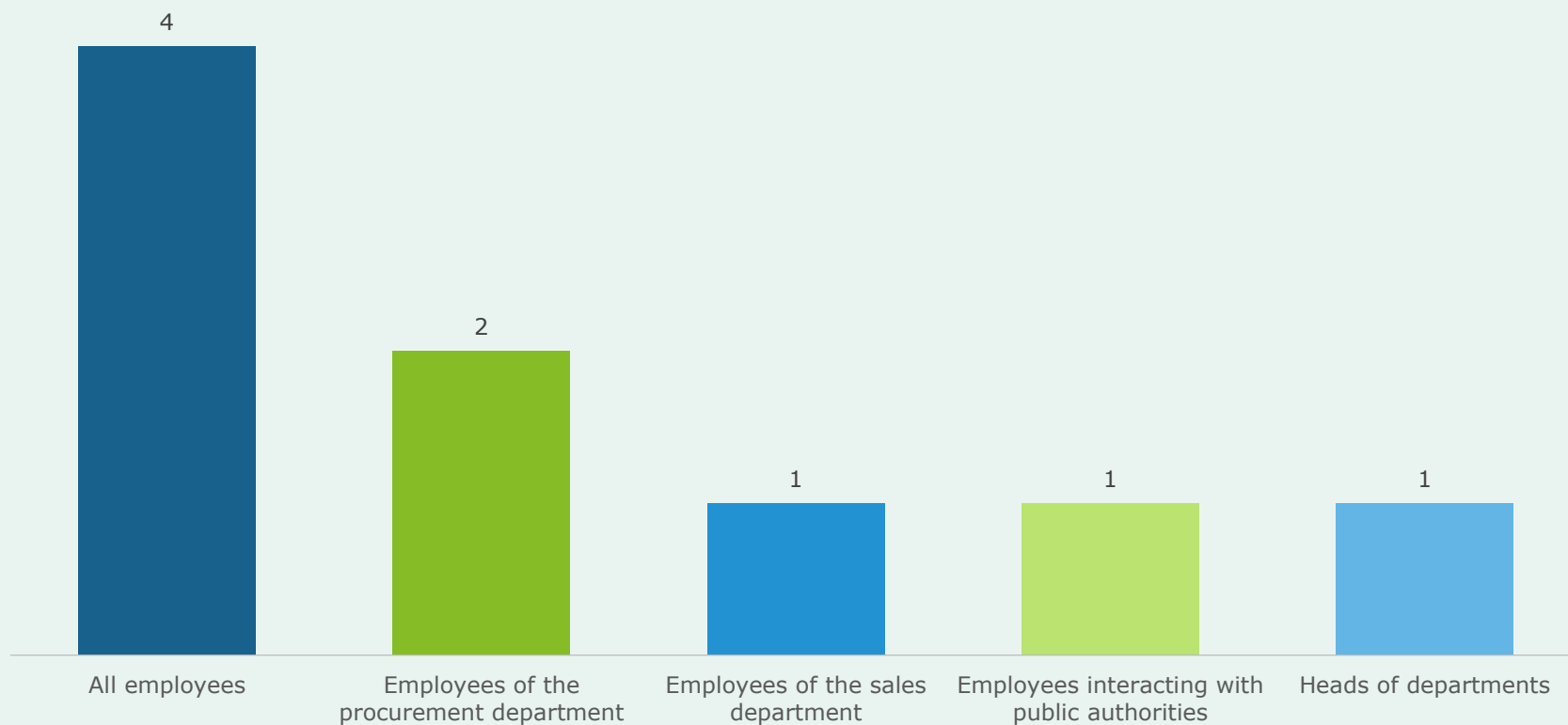
companies, hold training more often than annually

1

respondent could not answer the question about sufficiency of compliance training

7. Employee training on compliance

The following employees participate in anti-corruption training:



8. Reporting compliance violations

8. Reporting compliance violations

Existing methods for reporting violations of internal procedures and applicable law:



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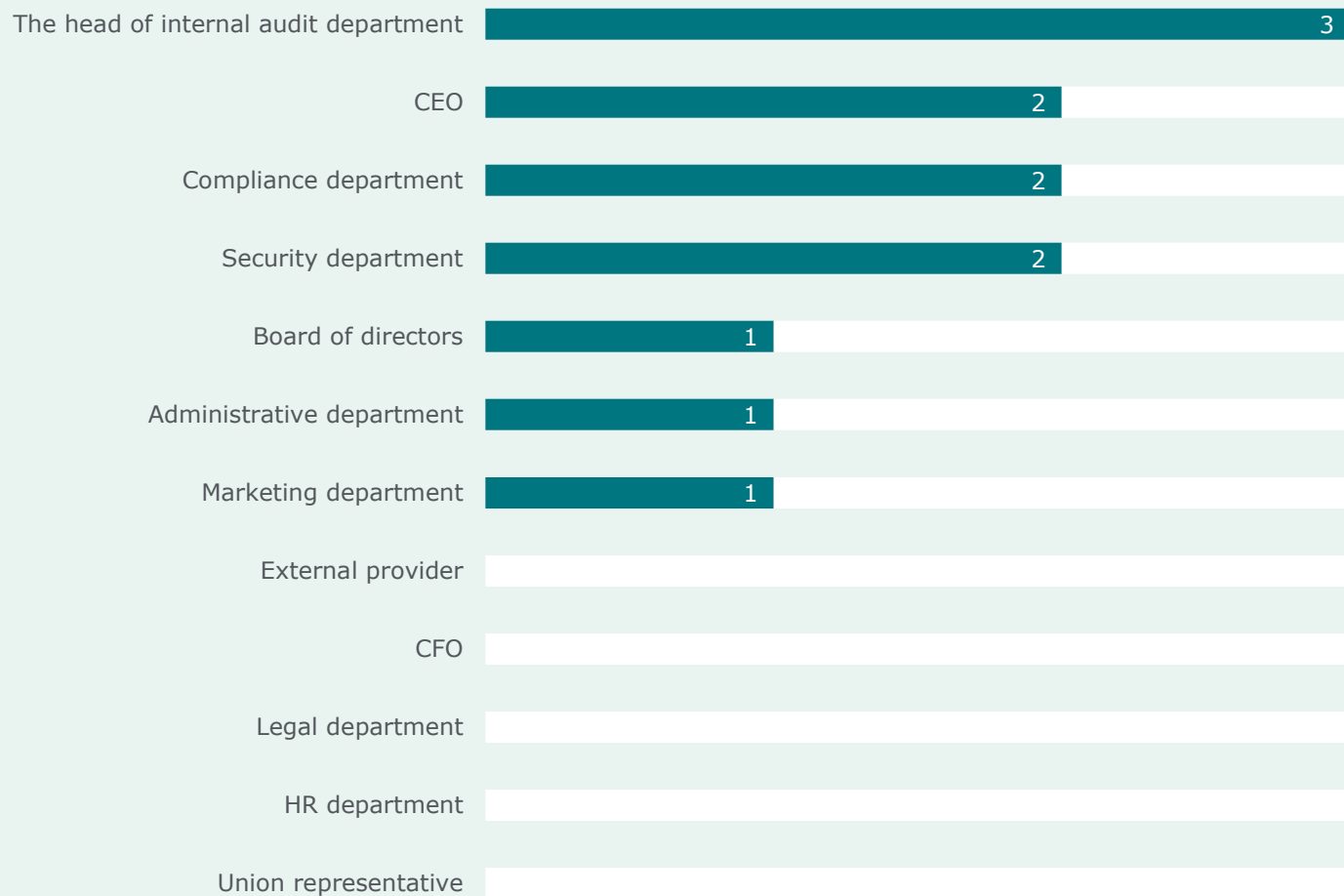
respondents consider the existing violation reporting channels to be anonymous

3

All companies have 3 or more ways to report violations of internal procedures or applicable law

8. Reporting compliance violations

Employees responsible for processing messages about violations of internal policies and applicable law:



8. Reporting compliance violation

Existing procedures for protecting employees that report compliance violations:



6

companies, have at least one procedure for protecting an employee that reports violations

3

respondents answered that good practice is to share information about violations with management before reporting them.

2

respondents could not answer the question about procedures protecting the employees that report violations

Thank you for your attention!



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