Employment and migration

General approach

The Labour Code of 30 December 2001 (the "**Labour Code**") outlines the main provisions applicable to employment arrangements in Russia, along with numerous decrees and instructions, as approved by the competent state authorities. Migration issues are mainly regulated by Federal Law No. 115-FZ "On the Legal Status of Foreign Nationals on the Territory of the Russian Federation" dated 25 July 2002.

Below is a general description of employment law provisions as they apply to all employees, as well as how they apply to foreign employees specifically.

Formalising the employment relationship

Employment agreement

Under the Labour Code employment agreements must be concluded in writing (except for teleworkers with whom it is possible to conclude the agreement electronically, i.e. using electronic digital signatures) and contain certain mandatory terms and conditions. Such mandatory terms include place of work, job position, job duties, commencement date, term of employment, remuneration, working time regime, etc. Employment agreements may contain additional terms and conditions, such as probationary period and confidentiality clauses.

The parties' rights and obligations under the employment agreement must comply with the minimum requirements set by law. An individual employment agreement must not result in an employee's terms and conditions of employment being worse than the terms and conditions of employment stipulated under the overriding requirements of employment law; otherwise, the legislation will supersede the provisions of the respective employee's employment agreement.

Term of employment

Employment agreements may be concluded for an indefinite term or for a fixed term; a fixed-term employment agreement may be concluded for a period of not more than five years.

The law provides for a limited number of grounds when an employment agreement may be concluded for a fixed term. These include, in particular, the following (the list is not exhaustive):

- an employee replacing a temporarily absent employee;
- project-related or seasonal employees;
- general directors, deputy general directors or chief accountants;

— employees of companies created for a specific term and purpose;
— employees engaged under the terms of secondary employment.

If a fixed-term employment agreement is concluded in breach of the Labour Code, the competent state authorities may recognise it as concluded for an indefinite term.

Salary

The statutory minimum gross monthly salary is set at RUB 12,130 (EUR 173) for the whole of Russia. At a regional level, a higher minimum monthly salary may be approved. For example, the minimum monthly salary in Moscow is currently set at RUB 20,195 (EUR 288).


RUB 70 = EUR 1 *notional exchange rate used for convenience

Salary is to be determined in the employment agreements and paid in roubles in instalments at least twice a month.

Probationary period

An employment agreement may provide for a probationary period which must not exceed three months. For general directors, deputy directors, chief accountants, deputy chief accountants and directors of representative offices, branches or other divisions, a longer probationary period may be established. This longer period must not exceed six months.

Both employers and employees are required to give the other party three calendar days' written notice when terminating the employment agreement during the probationary period. When dismissing an employee for failure to pass the probationary period, employers have an obligation to provide the employee with reasons for dismissal in writing. The employee may appeal the employer's decision in court.

The following employees cannot be subject to a probationary period:
— pregnant women and women with children under the age of 18 months;
— under-18s;
— young persons graduating from state-accredited educational institutions of primary, secondary or higher professional education, upon completing their education and applying for their first job within one year of graduation;
— certain other categories of employees as set forth by law and a collective bargaining agreement.

Working hours and leave

A normal working week is 40 hours. Overtime is permitted upon the employer's written request and, as a rule, requires the employee's consent. Overtime may not exceed a total of four hours in two consecutive days and is limited to 120 hours in total per year.

An open-ended working day regime may be established for certain categories of employees, if set out in the employer's internal regulations and relevant employment agreements.

This type of working day regime entails the employee being periodically engaged in additional work upon the written request of the employer without requiring the employee's written consent. Under this regime, the overtime work does not result in additional remuneration but does provide the employee with at least three additional days of paid leave per year.

The statutory annual paid leave for all employees is 28 calendar days. In certain cases expressly stated in the Labour Code, employees are entitled to additional paid leave.

Confidentiality obligation imposed on the employee

Russian law does not contain express provisions imposing confidentiality obligations on employees. If an employer wishes its employees to be subject to this type of obligation, it must (i) incorporate a confidentiality undertaking in the employment agreement of each employee concerned; (ii) adopt a set of internal regulations specifying the procedures for processing and obtaining access to confidential information; and (iii) implement the confidentiality regime provided for by law (i.e. use of safes, stamp "secret", etc.). In the absence of these measures, it will be almost impossible to hold an employee liable in the event of disclosure.

Restrictive covenants

Generally, Russian legal practice remains critical of the use of various restrictive covenants in employment agreements. For instance, non-competition clauses, though not directly prohibited by Russian law, are deemed as violating an employee's constitutional right to work and, therefore, unenforceable by the courts.

Another example is the narrow scope of the application of the "garden leave" concept (i.e. the practice by which an employee is instructed to stay away from work during his/her notice period). The Labour Code prohibits discharging an employee from further obligations under his/her employment agreement at the employer's discretion, except for a limited number of instances provided in the Labour Code. These exceptions are generally treated as the discharge of an employee from performing his/her work obligations in circumstances where there is a threat to a person's health, life or property.

Liability

Liability of the employee

An employee who breaches obligations established in his/her employment agreement may be subject to disciplinary sanctions and/or bear material liability.

The Labour Code strictly regulates the **disciplinary procedure**, and non-compliance may result in the employee successfully challenging the disciplinary sanction in court.

An employee's **material liability** is generally restricted to compensation for the direct damage caused to the

employer's property at the employee's fault or negligence. This liability is limited to an amount equivalent to the employee's monthly average salary.

However, the Labour Code sets out some exceptions to the limitation of material liability rule. It provides that an employer may, under certain conditions, impose full material liability where an employee:

- fails to protect valuable items entrusted to him/her, as evidenced by documents signed by the employee;
- intentionally damages property;
- causes damage when in a state of alcoholic, drug or other intoxication;
- causes damage as a result of criminal actions for which he/she has been sentenced by a court;
- causes damage as a result of an administrative offence as determined by the relevant state body;
- divulges confidential information;
- causes damage outside of his/her work duties; and/or
- has entered into an individual or a collective agreement on full material liability with the employer.

Full material liability extends to all damage incurred by the employer as a result of the fault of the employee.

Also, in the employment agreement, an employer may provide for full material liability for certain categories of employees (e.g. chief accountant, deputy general director, etc.). The general director of a legal entity is always subject to full material liability regardless of whether his/her employment agreement includes such a provision.

If the employer wishes to be compensated for the damage it suffered, it must follow a specific procedure and request from the employee a written explanation of the cause of the damage. Following this, the employer must specify the amount and cause of any damage inflicted within one month of the alleged damage having occurred. If the employer does not exercise its right within this time period, compensation may only be recovered with the voluntary consent of the employee or through legal proceedings.

Liability of the employer

The limitation period within which an administrative claim can be brought against an employer for failure to comply with labour laws is one year from the date that the violation was committed or, with respect to ongoing violations, from the date that the violation was discovered by the authorities. The maximum administrative fine that may be imposed on an employer's official for non-compliance with labour law requirements has been increased to RUB 30,000 (EUR 429). Furthermore, in the event of a recurring offence, the official may be disqualified for a term of up to three years. The maximum administrative sanctions that may be imposed on legal entities include an administrative fine of RUB 200,000 (EUR 2,860) and/or administrative suspension of activities up to 90 calendar days.

Notably, in accordance with the current law-enforcement and court practice, the penalty for the same offence may be imposed simultaneously on both the company and the general director or other authorised officer of the company. Moreover, if the same offence is simultaneously committed against a number of employees, the total amount of administrative fine imposed on the official or the entity for such offences may in some cases be calculated taking into account the total number of employees affected by the relevant offence.

Employment history recording

As of 1 January 2020, all employers must submit the information on each employee's employment to the Russian Pension Fund in electronic format. In relation to employees' labour books ("*trudovaya knizhka*") that have been obligatory before 2020, employers will only have to continue maintaining them if employees request this. Starting from 1 January 2021, employers will no longer be required to establish and maintain labour books in paper format for employees entering their first employment.

Specifics of hiring foreign nationals

If the employee is a foreign national, he/she may commence employment in Russia only once the steps described in the *Specifics of employing foreign nationals* section below have been completed.

In essence, employment law applies to foreign nationals to the fullest extent provided for in the Labour Code. Therefore, the employer is obliged to enter into an employment agreement with any foreign national and follow all rules and procedures which flow from their employment relationship.

Managing employment relationships

Internal policies

All employers in Russia (except for those that are qualified as "microenterprises") must adopt a set of mandatory internal policies that include Internal Labour Regulations, a Labour Safety Policy, a Personal Data Protection Policy, a Remuneration Policy and an Anti-corruption Policy. These policies must be in Russian or at least in a bilingual format, approved by the order of an authorised representative of the employer. The policies must be brought to the notice of, and signed by, employees.

The same requirements apply to any global policies that the employer would like to be binding upon the employees in Russia.

Health and safety at work

Workplaces of all employees in Russia must be assessed from a work safety perspective. The workplace assessment is not required for homeworkers, teleworkers and employees working for individuals who are not registered individual entrepreneurs.

The main purpose of the work safety assessment is to provide employees with relevant guarantees and compensation, and to set additional pension and social insurance rates. These rates depend on workplace hazards, which are rated as optimal, acceptable, harmful or dangerous.

The provision of the workplace assessment is a duty of the employer. It must be held at least once every five years unless an unscheduled workplace assessment is required under law.

Sick leave

When an employee is on sick leave, his/her employer is required to pay him/her a temporary disability allowance for the period of sickness. The employee's entitlement to the allowance is dependent on the submission of a medical certificate in the required form. The allowance is calculated on the basis of the average monthly salary over a period of two years and is capped at a specified amount.

The first three calendar days of an employee's temporary disability period are paid by the employer out of its own funds. Any additional days are then funded at the expense of the Social Security Fund of the Russian Federation.

The same rules may apply to foreign nationals, provided that they meet certain criteria in relation to their migration status.

Maternity and child care leaves

An employee who gives birth is entitled to 70 calendar days' maternity leave prior to and 70 calendar days' leave after the child's birth. Longer maternity leave may be granted in case of a multiple or abnormal pregnancy. This right arises upon the presentation of a medical certificate, which may be issued starting from the 30th week of pregnancy. This provides for a period of entitlement equal to 140 calendar days that can be used by the employee summarily (i.e. irrespective of the actual number of days used before the child's birth).

Child care leave may last up to three years and can be used by the mother or the child's relatives at any time during this period.

The employer is responsible for paying various maternity related allowances provided for by law and then sets off the relevant amount against payroll contributions.

In general, pregnant women and women with children under the age of three years are entitled to an extensive number of benefits and privileges under Russian employment law. In particular, such women may not be dismissed on the grounds of staff redundancy, neither may men with at least three children one of whom is under the age of three years provided that the mother of the children is not employed. Moreover, pregnant women may not be compelled to work a night shift, overtime, during days of rest or holidays and may not be sent on

business trips. Women with children under the age of three years may only be engaged in the above types of work upon their written consent and provided that their state of health allows them to perform these types of work, as confirmed by a medical certificate.

Trade unions

A trade union aims to represent employees and protect their social and labour rights and may be established in any company by at least three employees.

In the situations specified by the Labour Code (such as, for example, staff redundancy or termination of an employment agreement with a trade union member) or in collective agreements (if any), the trade union's motivated opinion is required. Should this occur, the employer must provide the trade union with draft documents explaining the relevant situation. The trade union has to reply within five working days, failing which the employer is free to ignore the union's opinion. If the opinion was duly submitted, but the employer decides to act contrary to it, the trade union has the right to appeal against the employer's decision to the Labour Inspectorate or a competent court.

Trade union leaders enjoy additional protection in certain cases where their employment is terminated at the instigation of their employer on certain grounds. They may not be dismissed without the consent of the upper-level trade union in cases of mass redundancy, repeated breaches of their work obligations, or where their dismissal was based on poor performance evaluation results.

Disciplinary sanctions

Non-compliance with work discipline (i.e. the non-fulfilment or inadequate fulfilment by an employee of his/her duties) may result in the following disciplinary sanctions being applied: a warning, an official reprimand or dismissal on corresponding grounds established by law.

Disciplinary sanctions may be imposed no later than one month after the time the employer had, or should have had, knowledge of the breach and, in any event, no later than six months after the breach was committed.

The Labour Code regulates the procedure for imposing disciplinary sanctions. Failure to comply with it renders the sanction invalid.

Terminating an employment agreement

Cases and grounds for termination

An employment agreement may be terminated (the list is not exhaustive):

- at any time by the mutual agreement of the parties;
- unilaterally by an employee providing two weeks' written notice or at the initiative of the employer (as discussed below);
- because of circumstances beyond the reasonable control of the parties;

— when the term of the employment agreement expires;
— if an employee refuses to continue working because of a change in the ownership of the company (employer) or its reorganisation (this only applies in relation to certain top executive positions); or
— if an employee refuses to continue working because he/she (together with the employer) is relocated.

The employer may terminate the employment agreement at its initiative only on the limited number of grounds expressly set out in the Labour Code, which include, among others:
— When there is **staff redundancy** or the employer is being **liquidated**. The employer must notify each employee in writing at least two months in advance. If there is staff redundancy, the employer must offer employees all available vacancies which are equivalent to or below their current qualifications.
— When an employee is **unsuitable** for an employment position. Unsuitability must be confirmed by an attestation committee review.
— When an employee **systematically fails to fulfil** his/her employment **duties without reason** or commits a **single gross dereliction** of his/her duties.
— When an employee is found to have presented **false documents** during the hiring process.

In respect of specific categories of employees (e.g. the general director, teleworkers), additional termination grounds may be provided for in the employment agreement.

The Labour Code requires that severance pay be made under certain circumstances.

Court practice with regard to dismissals varies substantially, and may differ from region to region. However, the general tendency is to protect the interests of employees, thus placing a greater onus on the employer.

Specifics of employing foreign nationals

Visas for foreign employees

Foreign nationals must apply for a visa. Citizens from the following countries of the Commonwealth of Independent States are exempt from Russian visa requirements: Armenia, Azerbaijan, Belarus, Kazakhstan, Kyrgyzstan, Moldova, Tajikistan, Ukraine and Uzbekistan.

Types of visas

There are five categories of visas: ordinary, official, transit, diplomatic and temporary residence. There are seven subcategories of an ordinary visa: business, tourist, work, student, private, asylum and humanitarian. The most important types of visa for legal entities are considered below.

Business visas

Business visas are intended for foreign nationals who wish to conduct short-term and temporary business activities

in Russia. Examples of these activities include business trips, negotiations, market studies and preparations to set up a company or any other type of establishment in Russia. Foreign nationals with multi-entry business visas are permitted to stay in Russia for up to 90 calendar days within a period of 180 calendar days.

Five-year business visas can be applied for in respect of employees or representatives of (i) large foreign companies investing in Russia which satisfy certain criteria established by the Russian Government; or (ii) companies taking part in Government projects such as Skolkovo or the International Financial Centre.

Foreign nationals who obtain Russian business visas are not allowed to undertake any type of work activities in Russia. This requires a work visa.

Work visas

Work visas are required for foreign nationals who intend to conduct professional activities in Russia.

A foreign national who has been issued an official invitation from an employer must first obtain a single-entry visa. The visa is valid for up to three months and may be exchanged for a one-year multi-entry work visa once the individual is in Russia, although this is not applicable to highly qualified specialists (please see the *Highly qualified specialists* section below). The family members of a work-visa holder may obtain visas of the same category marked "accompanying person". This visa allows family members to stay in Russia, but does not entitle them to work in Russia. It expires on the same date as the principal holder's visa.

Work visas are issued only after the employer has received general authorisation to recruit foreign nationals and a quota of foreign persons they may employ. Each foreign employee must also be granted a work permit (please see the *Individual work permits* section below).

The Main Department for Immigration Issues of the Ministry of Internal Affairs of the Russian Federation (the "**Immigration Department**") registers the employer as an inviting party for foreign nationals when the latter applies for a visa invitation for the first time.

The process of obtaining a work visa usually takes from 12 to 14 weeks.

Procedures relevant to an employer

An employer who recruits foreign employees to work in Russia has to comply with the following procedures.

Quotas

All legal entities wishing to employ foreign nationals must apply each year for a quota of foreign employees whom they may employ. The deadline for filing the quota application is established separately in each region of Russia. Certain professions and some categories of foreign employees (e.g. highly qualified specialists, foreign nationals

who are exempt from the requirement to hold a work permit) are quota-exempt.

The quota allocated to each legal entity depends on the general quota set each year for all foreign employees. This quota differs between regions, different categories of employees, as well as different professions, countries of origin and other economic and social criteria.

General authorisation for the recruitment of foreign nationals

The general rule is that any employer intending to recruit one or more foreign nationals must obtain a prior general authorisation from the Immigration Department to recruit foreign employees within its allocated quota. By way of exception, no such authorisation is required for highly qualified specialists and for foreigners from CIS[1] countries.

In its application for this authorisation, the employer must justify the use of foreign employees.

Individual work permits

General remarks

Once the general authorisation for the employment of foreign employees has been obtained, the employer must apply for a work permit for each employee.

A work permit is required for any foreign national who wishes to perform any "work activity" in Russia, including temporary work.

However, the following categories of foreign nationals are exempt from the work permit requirement:

— citizens of countries which are members of Eurasian Economic Union (the "**EEU**") (currently Armenia, Belarus, Kazakhstan and Kyrgyzstan have joined the Union with Russia);
— those holding a permanent residence permit; and
— those holding a temporary residence permit, which allows them to work only in the region of Russia where they reside.

These categories of permit-exempt foreign nationals are not taken into account in their employers' quotas and general authorisations to recruit foreign employees.

Employers are obliged to notify the Immigration Department on conclusion and termination of employment and civil law contracts with all categories of foreign nationals within three working days following the date of conclusion or termination of the contract.

Language command requirements

Applications for work permits for non-visa foreigners need to include a dedicated certificate proving their command of the Russian language, Russian history and fundamentals of Russian law (the "**Russian Language and Civilisation**"), unless they hold

[1] The member states of the Commonwealth of Independent States are Armenia, Azerbaijan, Belarus, Kazakhstan, Kyrgyzstan, Moldova, Russia, Tajikistan and Uzbekistan.

a relevant Soviet or Russian certificate of education.

Distinct rules apply to foreigners subject to a visa regime. They are given more time to prove they meet the Russian Language and Civilisation requirements. Proof must be submitted to the authorities within 30 calendar days from the issuance of the relevant permit (rather than upon application). If they fail to do so, their permits will be cancelled.

Certain categories of foreigners are exempt from the Russian Language and Civilisation requirements, such as highly qualified specialists and their relatives, and full-time foreign students with accredited educational institutions in Russia.

Personal accreditation of foreign employees of representative offices and branches

If the employer is a representative office or branch of a foreign company in Russia, it must apply for approval for the relevant number of foreign employees from the Chamber of Commerce and Industry of the Russian Federation as part of the accreditation process for the representative office or branch. Within that approved number, the employer must apply to the Chamber of Commerce and Industry for a personal accreditation card for each foreign employee.

Personal accreditation does not relieve the employer from having to obtain a general authorisation for the recruitment of foreign nationals, a work permit and a work visa for its foreign employees.

Notification

There is a notification procedure which foreign nationals and their hosting parties must follow. This procedure also applies to highly qualified specialists.

It is based on the following principles:

— The Immigration Department must be notified of arrivals and of any travel within Russia.
— Foreign nationals can be registered at the address of the organisation where they carry out employment (or other activities not prohibited by Russian law) in the following cases only: (i) when they actually live at the address of the relevant organisation or (ii) when they live at a place of residence provided by an organisation which does not have a permanent address (e.g. a makeshift barrack). As most foreign employees and their families live in rented accommodation, their landlords are responsible for registering them.
— A highly qualified specialist and the members of his/her family are allowed a period of 90 calendar days from the date of entry into Russia, during which they are not required to register with the migration authorities. Once the foreign specialist has been in Russia for 90 calendar days, he/she must be registered at his/her place of residence.
— Armenian, Belarusian, Kazakh and Kyrgyz employees and the members

of their family have to register within 30 calendar days.
— For all other foreign nationals, the registration procedure with the Immigration Department must be completed within seven working days.
— Foreign nationals staying in Russia or travelling to another Russian region for less than seven working days, who are not staying in a hotel or in "a hotel-like residence", are exempt from the notification procedure.
— Heads of State, heads of diplomatic missions, members of parliamentary or governmental delegations, heads of international organisations (and family members of these persons) are exempt from the notification procedure. Ship, train or aircraft crew members are exempt from the procedure under certain conditions.

Business trips within Russia

A foreign employee is permitted to go on business trips outside the Russian region(s) in which his/her work permit is valid only if he/she occupies a position which is included in the list of occupations approved by the Ministry of Health and Social Development.

In addition, the duration of foreign employees' business trips is regulated as follows:
— a total of ten calendar days during the validity of a general work permit; and
— 30 consecutive days during the validity of a highly qualified specialist work permit.

Different rules apply to foreign nationals who hold temporary or permanent residence permits.

The duration of business trips of highly qualified specialists having a travelling character of work regime fixed in their employment agreements is not limited.

Foreign employees holding "*patenty*" for work in Russia (this is a special type of authorisation for work issued to nationals of CIS countries who are not eligible or not willing to apply for a highly qualified specialist work permit) are allowed to work only in the Russian region in which their patent for work is valid. They are not permitted to go on business trips outside of such region.

Highly qualified specialists

Highly qualified specialists are foreign employees with professional skills, knowledge and the proper qualifications in a specific area to which a specific regime applies.

The monthly remuneration paid to a highly qualified specialist must be at least RUB 167,000 gross (EUR 2,386), unless a lower amount is set by law or in international agreements for certain nationals.

The highly qualified specialist regime is available to Russian commercial legal entities as well as to Russian-based duly accredited branches and representative offices of foreign legal entities.

When the above criteria are met, a simplified procedure applies for obtaining a highly qualified specialist work permit and work visa. Accordingly, a work permit may be obtained within 14 working days and the employer is exempt from fulfilling a significant number of formalities (obtaining a quota, general authorisation to recruit foreign employees, etc.).

In addition, opting for a highly qualified specialist regime provides employers and highly qualified specialists with increased flexibility, such as:

— A work permit is valid for up to three years, whereas an ordinary one is valid for only one year.
— A work permit may be valid for multiple Russian regions rather than just the region where the employer is based.
— There are fewer restrictions on business trips (as mentioned above).

Bilateral and multilateral international agreements

There are several international agreements regulating foreign workforce issues. They affect in particular French, South Korean, Armenian, Belarusian, Kazakh and Kyrgyz citizens.

Arrangements applying to French employees in Russia

On 1 March 2011, the Agreement "On the Temporary Employment of Citizens of One Country on the Territory of the Other", as signed on 27 November 2009 between the Russian Federation and France, came into force.

Special filing procedures and review processes for obtaining authorising documents for employment have been established, with the goal of simplifying the temporary employment of the citizens of the two signatory countries. In particular, documents allowing French citizens to enter and work in the Russian Federation have to be processed within one month.

Arrangements applying to Korean employees in Russia

An Agreement has been in force since 1 January 2012 between the Governments of the Russian Federation and the Republic of Korea (South Korea) on the temporary work activity of their respective citizens.

This Agreement simplifies the rules and procedures applicable to the stay and employment of (i) Korean employees of representative offices of legal entities in Russia; (ii) Korean employees working at or for Russian organisations belonging to a Korean group of companies; (iii) Korean top executives managing Russian enterprises; and (iv) some family members.

In particular, quotas limiting work activities do not apply to these persons.

Arrangements applying to Armenian, Belarusian, Kazakh and Kyrgyz employees in Russia

In accordance with the Agreement on the EEU signed in Astana on 29 May 2014, simplified rules of employment of foreign nationals apply to citizens

of countries which are EEU member states. As commented above, currently, Armenia, Belarus, Kazakhstan and Kyrgyzstan have joined the Union with Russia.

The Agreement introduces reciprocal preferences, thereby simplifying significantly the conditions of stay and employment of the countries' respective citizens.

Quota, general recruitment authorisation and work permit requirements do not apply to EEU employees in Russia. These migrant employees and family members are allowed to stay in Russia for the duration of a migrant employee's employment agreement. The timeframe for notification of entering Russia is 30 calendar days from the entry date (rather than seven working days).

Sanctions for violating migration legislation

If an employer fails to comply fully or in part with the relevant migration procedures, it risks a fine (calculated per breach) of up to RUB 800,000 (EUR 11,440) and/or the suspension of its activities for up to 90 calendar days. The employer's officials may be liable to fines of up to RUB 50,000 (EUR 715). A foreign employee may also be fined up to RUB 5,000 (EUR 71), and may be deported from and banned from entering Russia. An entry ban can also be imposed on a foreign national who has been held administratively liable two or more times, including for violations of legislation other than in the field of migration (such as, for instance, road traffic regulations). Foreign nationals are therefore strongly advised to be as compliant as possible in view of the risk of an entry ban.

Stricter sanctions apply to the violation of migration law requirements in Moscow, Saint Petersburg, the Moscow Region and the Leningrad Region, namely: individuals will pay fines of RUB 5,000 - 7,000 (EUR 71 - 100) and be deported from Russia, officials – RUB 50,000 - 75,000 (EUR 715 - 1,071) and companies – RUB 800,000 - 1m (EUR 11,440 - 14,300) and/or have their operations suspended for 14 to 90 calendar days.

» In accordance with current law-enforcement and court practice, both the company and the company's general director or other authorised officer may be held liable for the same violation of labour laws, work safety and/or migration law requirements.