



Anti-Bribery and Corruption Services

We help our clients to develop internal regulations and procedures aimed at preventing bribery and corruption, also known as "Compliance".

Analysis of internal documents and sample testing of processes

We help analyze compliance with anti-bribery and corruption legislation, including the Foreign Corrupt Practices Act (FCPA), UK Bribery Act and the Russian federal law "On Corruption Prevention" N273-FZ, including the "methodological recommendations for development and acceptance of measures to identify and prevent corruption" issued by the Russian Federation Ministry of Labor and Social Protection.

Using our internally developed methodology, we analyze accounting data, hardcopy and electronic documents to identify potential weaknesses in anti-bribery and anti-corruption procedures and develop recommendations to address the potential weaknesses.

Development of internal regulations and customization of control framework

We assist our clients to develop and enhance policies and other documents, from internal regulatory documents to job descriptions. We assist in the development of special anti-bribery and anti-corruption procedures, such as the prevention of conflicts of interest, gift and entertainment procedures, and policies on sponsorship and charity.

Our team has wide experience implementing whistleblower hotlines, including the launching of hotline channels, the development of allegations review procedures and conducting investigations.

We also help our clients to implement control frameworks, for areas such as buy and purchase processes, including the consideration of discounts and special conditions, and control of payment documents to identify potential violations of anti-bribery and anti-corruption requirements.

Our advantages:

- We are the leading Forensic practice in Russia and CIS providing anti-bribery and anti-corruption services;
- We have deep understanding of the issues related to implementing anti-bribery and corruption procedures;
- Our team consists of highly qualified professionals with extensive compliance experience in large companies in different industries;
- Deloitte Forensic has successfully conducted many projects on enhancing anti-bribery and anti-corruption processes in Russia and abroad.

Deloitte can help you implement or improve the main anti-bribery and anti-corruption mechanisms:

1. Appointment of a compliance officer, who is responsible for developing and implementing anti-bribery and corruption measures, and providing the compliance function with all necessary resources;
2. Internal regulations including a Code of Ethics and special anti-corruption procedures and embedding these into operations;
3. A whistleblowing hotline and procedures for reviewing and investigating allegations;
4. Regular monitoring of the efficiency of anti-bribery and anti-corruption processes;
5. Due diligence of employees and counterparties to identify conflicts of interest and prevent compliance risks;
6. Advisory and training procedures.

Anti-bribery and anti-corruption services help address the requirements of:

- Counterparties who seek certain policies and procedures in order to do business
- Strengthened legislation/regulatory policies
- Shareholders or another supervisory body

These services also can help during:

- Acquisition due diligence
- Implementation or enhancement of anti-bribery and anti-corruption mechanisms
- Identification and resolution of conflicts of interest

Our select experience:

Russian subsidiary of a major automotive company

Our team analyzed all of the company's anti-bribery and anti-corruption measures against the shareholders' compliance requirements, which included a number of anti-bribery and anti-corruption processes. We provided a number of recommendations to amend existing procedures.

Russian subsidiary of a major tire production company

Our team analyzed the compliance policies of the company's headquarters and assisted in the implementation of these measures in the Russian subsidiary according to Russian regulatory requirements and the business practices of the company.

Gap analysis of FCPA requirements

We assisted a large pharmaceutical company in a review of their expenses against FCPA requirements and the company's internal requirements, including compliance procedures. We identified a number of deviations from internal procedures. The company used our recommendations to enhance its business processes and compliance procedures.

Major oil and gas company in Kazakhstan

Our team was engaged in a long-term project on enhancing the whistleblowing processes of a large oil and gas company. Our team helped the company to fine-tune the overall whistleblowing process from receiving allegations to recommendations for amending internal procedures according to the results of investigations. This allowed the company to further maintain the whistleblowing process without any assistance from third parties.

Contacts:



Alexander Sokolov

Partner

Tel.: +7 (495) 787 06 00

Ext. 3095

alsokolov@deloitte.ru



Rustam Mukhametshin

Senior Manager

Tel.: + 7 (495) 787 06 00

Ext. 5056

rmukhametshin@deloitte.ru



Ludmila Grechanik

Partner

Tel.: + 7 (495) 787 06 00

Ext. 3092

LGrechanik@deloitte.ru

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee, and its network of member firms, each of which is a legally separate and independent entity. Please see www.deloitte.com/about for a detailed description of the legal structure of Deloitte Touche Tohmatsu Limited and its member firms. Please see www.deloitte.com/ru/about for a detailed description of the legal structure of Deloitte CIS.

Deloitte provides audit, tax, consulting, and financial advisory services to public and private clients spanning multiple industries. With a globally connected network of member firms in more than 150 countries, Deloitte brings world class capabilities and deep local expertise to help clients succeed wherever they operate. Deloitte has in the region of 200,000 professionals, all committed to becoming the standard of excellence.

Deloitte's professionals are unified by a collaborative culture that fosters integrity, outstanding value to markets and clients, commitment to each other, and strength from diversity. They enjoy an environment of continuous learning, challenging experiences, and enriching career opportunities. Deloitte's professionals are dedicated to strengthening corporate responsibility, building public trust, and making a positive impact in their communities.