

# GOVERNMENT RELATIONS

## Russia



# Government Relations

Consulting editors

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Quick reference guide enabling side-by-side comparison of local insights, including into applicable forms of government and opportunities to influence legislation; regulation of lobbying regulation; political finance; ethics and anti-corruption; recent cases; sanctions; and other recent trends.

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## FORM OF GOVERNMENT

### Constitution

What is the basic source of law? Describe the scope of, and limitations on, government power relevant to the regulation of lobbying and government relations.

The main source of law in Russia is the Constitution. The current Constitution was adopted in 1993 (two years after the collapse of the Union of Soviet Socialist Republics).

The Constitution defines the administrative and territorial division of the country, establishes the form of government and identifies the main bodies of state power and the principles of local self-government. The Constitution also defines the basic rights and freedoms of 'man and citizen'. It has supreme legal force throughout the territory of Russia.

The Constitution establishes the separation of legislative, executive and judicial authorities and their independence. However, the scope of powers of executive authorities (the President and the government) makes Russia largely a super-presidential country. The legislative branch and the judicial system have nominal influence and are mostly dependent on the executive branch.

The Constitution confirms the rights of citizens to associate to protect their interests and guarantees freedom of activity of public associations. The rights of the business community are not separately reserved in the Constitution.

In respect of cooperation with the state, citizens have the following rights:

- the right to participate in state administration directly or through their representatives;
- the right to elect and to be elected to state authorities and local self-government authorities;
- the right to send individual or collective inquiries to state authorities and local self-government authorities; and
- the right to appeal in court the decisions and actions of state authorities, local self-government authorities and officials.

The Constitution describes the role and responsibilities of the President, the Federal Assembly (the parliament), the government, the judicial branch and the public prosecution service.

The Constitution also establishes the bodies and their members that possess the right of legislative initiative: the President; the Federation Council (the upper house of parliament); Federation Council members; State Duma (the lower house of parliament) members; and the government and legislative bodies of constituent entities of Russia (regional parliaments). The Constitutional Court and the Supreme Court also have the right of legislative initiative with regard to the issues pertaining to their competence.

At the beginning of 2020, the President's annual address to the Federal Assembly served as an impetus for changing the Constitution. Later, voting for amendments took place, resulting in formal changes to the balance of power, organisational structure and social sphere (minimum wage, retirement payments).

Key amendments include:

- the Constitution is prioritised over the decisions of international bodies (most likely as protection from decisions of international courts in the context of sanctions and trade wars);
- the State Duma's position is strengthened: the right to approve the nomination of the Prime Minister, deputy ministers and the majority of ministers was transferred to the State Duma;
- the Federation Council received the right to take part in appointing law-enforcement officials, regional prosecutors, foreign affairs officials, etc;
- the role of governors and other regional heads in the decision-making process at the federal level is formally

strengthened through constitutional consolidation of the status of the State Council. The State Council is an advisory body to assist the President on matters of coordinated interaction between different levels of governance. It existed before, but is now expected to play a more noticeable role;

- the President will not only be able to preside during the government's sessions, but will also 'provide general guidance to the government';
- the number of presidential terms is limited to two, with a clause that allows former presidents to run again, without considering their previous terms;
- the Constitutional Court receives the right to review drafts of federal constitutional laws and federal laws after their final approval by the parliament to verify their constitutionality. The right to initiate such a procedure belongs to the President; and
- harsher requirements are set for key officials: the President, heads of regions, members of the federal legislature, judges, etc.

The amendments did not affect the super-presidential character of governance, but gave more formal power to the legislative branch while simultaneously strengthening presidential control over the executive branch; formally declared the importance of regional and local governance; and included several socially approved provisions. The amendments did not change key human and citizen rights, including cooperation between the people and the state.

Certain provisions of the Constitution are further elaborated in the Federal Constitutional Laws, which occupy the second tier after the Constitution in the legal hierarchy. With regard to interaction with state authorities, the Law on the Government and the Law on the Judicial System are important. These laws define, among other things, the general powers, the procedure of formation and relations with other authorities.

*Law stated - 14 December 2022*

## Legislative system

Describe the legislative system as it relates to lobbying.

Russia is both a presidential and a parliamentary republic. This means that the government and the Chair of the Government (the Prime Minister) are accountable to both the President and the Federal Assembly.

According to the current Constitution, the President has broad powers to control other authorities. However, the constitutional amendments of 2020 have formally transferred some Presidential powers to the legislative branch.

The State Duma will approve the nomination and releasing from service of the Prime Minister, as opposed to just giving consent to the President, as well as deputy prime ministers and ministers (with the exception of those in charge of national security and defence, internal and foreign affairs, prevention of emergency situations).

Candidates for the Prime Minister's, deputy vice ministers' and ministers' offices can be proposed to the State Duma three times. In the case of non-approval, they are appointed by the President. The President can decide on dissolution of the State Duma, if one-third of these positions remain vacant (previously, the President had to dissolve the State Duma and announce new elections).

Despite such appointments and their passage through the State Duma being controlled processes, they may become a stress test for parliamentary procedures. They may also lead to an increase in public scrutiny of the government's work and attempts to influence the priorities of specific departments (in the process of discussing the candidates).

However, Russia remains a super-presidential republic wherein the President and his subordinate institution (the Presidential Executive Office) consolidate power.

Although a fairly wide range of bodies have the right of legislative initiative, the government is the initiator of most of

the adopted laws. The President usually introduces draft laws on the most sensitive social issues. In most cases, draft laws have a chance to be passed, subject to approval by the government or the Presidential Executive Office (or both).

Draft laws introduced by State Duma members of oppositional factions, by legislative assemblies of constituent entities of Russia or those unapproved by the government or the Presidential Executive Office have almost no chance of being passed. All this leads to a less significant status of the State Duma and its somewhat technical role in the legislative process.

The Federal Assembly is the highest legislative body of the country. It consists of two chambers: the State Duma and the Federation Council.

The State Duma consists of 450 members who are elected for five years by direct national elections according to the mixed electoral system. Of these, 225 members are elected according to the proportional system with a threshold barrier of 5 per cent and 225 members are elected according to the majority voting system in single-member districts. The number of districts within the same constituent entity of the country depends on the size of the population of the constituent entity. Each constituent entity has at least one single-member district.

The system of election of State Duma members has changed more than once as a result of the political environment. The last change occurred before the 2016 election when elections in single-mandate constituencies were reintroduced. The change was aimed at increasing the number of State Duma members from the pro-presidential party, United Russia.

The latest parliamentary elections were held between 17 and 19 September 2021 (a bill allowing multi-day voting – up to three days – was signed into law in 2020) with the pro-government party United Russia retaining a constitutional majority of seats (49.8 per cent of the party list votes and 198 of the 225 seats elected through legislative constituencies). Seats were also won by the Communist Party of the Russian Federation (18.9 per cent), the Liberal Democratic Party of Russia (7.5 per cent), A Just Russia – For Truth (7.4 per cent) and, for the first time ever, New People (5.3 per cent).

The newly elected State Duma of the eighth convocation commenced its work on 12 October 2021 and will run until 2026.

The main features of the new State Duma significant for the legislative process and lobbying are as follows:

- The new State Duma can be characterised as a fully governable parliament (thanks to United Russia's constitutional majority) with a high degree of manageability for the Presidential Administration (in charge of domestic policy issues), whose leadership has a direct influence on key factions and committees.
- The newly elected State Duma saw an increase in the number of factions (from four to five) and the members of the parliament with extensive experience working in leadership roles within the executive branch, as well as professional lobbyists and business leaders. This resulted in a larger number of deputy chairs in the State Duma (from eight to 11) and State Duma committees (from 26 to 32).
- A 'liberal' mini-faction that has gained seats in parliament for the first time in a long time will not have a significant impact on voting and the actual work of the committees. Generally, it can reflect the position of 'patriotic' (Russian) businesses in the public domain and advocate a moderate expansion of economic freedoms for businesses and regions and a reduction of the impact of the economic leadership on economic processes, but exclusively with the support of the Presidential Administration.
- The composition of those State Duma committees most important for the business community have largely remained stable in terms of their management and key members from United Russia (eg, the Committee on Budget and Taxes and the Committee on State Building and Legislation consider all bills on fines and other penalties for businesses provided by the Criminal Code and Code on Administrative Offences). As for the structure of the committees, it became more closely tied to the areas of responsibility of the respective federal ministries and agencies (most of the industry-specific committees follow the 'one committee per ministry

formula'). This will have the following implications for the legislative process:

- On the one hand, strengthened links between government agencies and specialised State Duma committees could help push draft laws and second readings that are important for government agencies more quickly. On the other hand, narrow specialisations of the committees and their direct ties to government agencies will allow them to monitor the preparation of by-laws by ministries more closely, provided that the leadership of the State Duma committee has the necessary political backing for such actions.
- In some areas (eg, environmental protection), 'conflict-ridden' relations are possible between government agencies and the respective State Duma committees, which may influence decision-making and lead to delays in the adoption of regulations.
- Also, government agencies are expected to try and actively influence the creation of expert councils under the State Duma committees that look very much like the public and expert councils operating under the respective agencies themselves in terms of their composition.
- Despite the narrow specialisation of committees, increasing their number will ensure that lobbying opportunities remain through co-responsible committees. Amendments to State Duma regulations aimed at increasing the importance of conclusions drawn by co-responsible committees when considering draft laws were already adopted during the previous convocation.
- Taking this into account, it may be worthwhile for government relations professionals to establish cooperation with the leadership of the Presidential Administration, deputy heads of State Duma committees from the Leaders of Russia competition (the national competition for managers coordinated by the Presidential Administration) who are aligned with it, deputy chairs of the State Duma who wield political influence of their own and the leaders of 'heavyweight' industry committees within the State Duma.
- Working with ordinary members of State Duma committees will be less important in terms of lobbying, especially in cases of 'remote' elements of work in the State Duma being expanded amid the covid-19 pandemic.
- When it comes to controversial draft laws that affect several areas, it may be worth making better use of working mechanisms through co-responsible committees that are already provided for by the State Duma regulation, in order to ensure that the interests of industry-specific committees and departments are properly represented.

*Law stated - 14 December 2022*

## National subdivisions

Describe the extent to which a legislative or rule-making authority relevant to lobbying practice also exists at regional, provincial or municipal level.

Russia is a federal state comprising 85 constituent entities (regions) that have their own framework law (a constitution or a statute) and their own legislation.

In addition, in 2020, a new type of territorial formation (federal territories) was introduced. The legal status of federal territories is not equal to that of the constituent entities; they were presented as special regulatory zones that are expected to boost development in fields such as technology, science and innovation, medicine and education, and they expand the access of citizens and businesses to participation in such projects.

By the end of December 2020, a law on the first federal territory 'Sirius' was passed. Key features of public governance of Sirius are self-governance with regard to establishing its own set of public bodies – council, head of the territory and administration – and economic independence. Federal territories will have their own budget and property.

The effect of the regional legislation in federal territories will be limited. The right to legislate in relation to the territorial issues lies with the council of the territory. Territorial governing bodies will have the right to propose amendments to federal legislation through the President and the government, and amendments to regional legislation through the

governors.

A five-year transition period has been provided for establishing the organisational structures of Sirius.

As for relations between the federal centre and the regions, the Constitution establishes a list of issues that are the responsibility of the government (ie, at the federal level) or that are the joint competence of the government and the constituent entities. The constituent entities assume the powers of the government on issues that are not included in this list.

For instance, regions can impose corporate property tax, gambling tax and transport tax. Regions also bear partial responsibility for health issues, the environment, etc.

In addition, the Constitution grants regional parliaments legislative initiative at the federal level (regional parliaments can also prepare feedback on draft federal laws as this is stipulated by the legislation). However, their actual influence on the federal legislative process is limited, except in a very limited number of regions headed by powerful governors (eg, Moscow, those regions where the largest oil and gas fields are concentrated, and some national republics).

With regard to the municipal level, the Constitution presumes that the local government provides for independent resolution by the population of the issues of local significance. Local self-government authorities may manage municipal property, form and execute the local budget and establish local taxes (local taxes include land tax, sales tax and personal property tax) and fees. At the same time, the amendments to the Constitution introduced in 2020 also provide for the integration of municipalities into a 'unified system of public authority', but there was initially much ambiguity about the possible organisation of a new unified system of public authority.

A bill on the general principles of public authority in Russia's constituent entities prepared to further elaborate the Constitutional provisions was submitted to the State Duma in September 2021. The bill provides for the integration of federal, regional and municipal authorities into a unified management vertical and modifies the system of checks and balances by making regional authorities subordinate to federal ones and the legislative subordinate to the executive, with the President overseeing all power branches and levels. Thus, it actually paves the way for strengthening control of the federal centre over the regions and curtailing independent political activity. Specifically, the bill strengthens the control of the President and the federal executive authorities over the regions as it stipulates the following:

- The President ensures coordinated functioning of the bodies constituting the unified public authority system.
- The President can dismiss regional governors on the grounds of 'loss of confidence'.
- The President is authorised to issue warnings to regional governors and parliaments if they approve regulations that contradict the Constitution or federal legislation (if the contradictions are established by a relevant court and are not eliminated upon the court decision) and dismiss them if no measures are taken to eliminate the contradictions following the warning issuance.
- The President has the right to suspend regional governors' orders and decrees of regional governments contradicting the Constitution or violating human rights and freedoms until the respective issue is considered by a court.
- Federal executive authorities are authorised to participate in establishing regional government bodies supervising healthcare, education, finance and some other spheres, as well as in approving the appointment (dismissal) of their heads.

At the same time, while the bill makes regional governors (the bill proposes to use the unified term 'head of the region' but for consistency of terms in the article we will further use the term 'governor') more dependent on the federal centre, it also gives them more influence over regional parliaments and municipal authorities:

- A regional governor is authorised to dismiss a regional parliament if it passes a law that contradicts the Constitution and federal legislation (if this is established by a court) and does not take measures to eliminate the contradictions.

- A regional governor has the right to issue a warning or reprimand to a head of a municipal district for non-execution or improper execution of his or her duties.
- The existing term limits for regional governors (no more than two terms in a row) are removed.

Other noteworthy provisions:

- The bill establishes a long but closed list of issues (including 170 positions) from the spheres of joint competence of the federal centre and the regions for which the regions will be responsible (eg, prevention of regional and intermunicipal emergency situations, participation in state ecological monitoring, establishment of waste generation standards and disposal limits, etc).
- The bill recognises members of regional parliaments as public officials and imposes several restrictions on them (they are not allowed to combine their position in a regional parliament with any other paid work, except for scientific, creative and teaching activities, have foreign citizenship and foreign bank accounts, etc).
- The bill also reduces opportunities for protest actions.

On 14 December, the bill was passed by the State Duma in the third final reading. It was approved by the Federation Council and officially published on 21 January 2022 (and it came into effect from the date of official publication, except for some provisions).

Another noteworthy development that signifies increased control of the federal authorities over the regions is a decision of Prime Minister Mishustin to appoint his deputy supervisors of federal districts (each federal district includes several regions; the federal districts along with positions of presidential plenipotentiaries to the federal districts were established by a presidential decree in 2000 to improve the system of control over the execution of the federal authorities' decisions at the regional level and oversee the enforcement of federal laws – there are now 8 federal districts). District supervisors will be responsible for the investment and economic development of the territories under their supervision. In terms of politics, this means that governors' influence on regional investment and economic policies will decline further.

*Law stated - 14 December 2022*

## Consultation process

Does the legislative process at national or subnational level include a formal consultation process? What opportunities or access points are typically available to influence legislation?

Several basic methods and tools can be used by Russian citizens, the business community and public organisations to influence the decision-making processes of bodies of legislative and executive power, though the degree of real influence remains low.

## Public councils, expert councils and working groups

Public councils, expert councils and working groups are advisory bodies established by legislative and executive bodies. They are comprised of representatives of civil society, the business community, scientific and expert communities, etc.

The powers of these bodies can include participation in the preparation of legislative and other statutory legal acts, participation in meetings and discussions of legislative and executive authorities, and ensuring public control over activities of the authorities.

In 2020, the Chair of the State Duma spoke in favour of giving expert councils more power to influence the legislative process. The expert councils received the right by the Chair and vice-chairs to present their position during a plenary session if they believe the draft requires additional work.

## **Public consultations on draft statutory legal acts**

Draft statutory legal acts (SLAs) developed by federal executive authorities are subject to public consultations on [www.regulation.gov.ru](http://www.regulation.gov.ru) (although with exceptions – draft SLAs containing confidential information or state secrets, prepared to implement federal projects, etc, are not subject to public consultation).

Public consultations can be held both as separate procedures and as parts of regulatory impact assessment (if draft SLAs are subject to regulatory impact assessment (RIA); see below). In the first case, the public consultation procedure includes the following stages:

- placement of a notice of a SLA development and public consultations on this notice (not a mandatory stage; conducted upon the decision of the respective government agency's head);
- public consultations on a draft SLA (the minimum term for public consultations is 15 days);
- revision of comments submitted during public consultations by a responsible government agency and publication of a summary of policy proposals with the position of a responsible agency in each of them; and
- revision of a draft SLA (if necessary) and its publication on the public consultation platform.

The importance of public consultations arises from the fact that draft SLAs developed by government agencies usually become publicly available for the first time at this stage. Also, with every user of [www.regulation.gov.ru](http://www.regulation.gov.ru) being able to participate in discussion of draft SLAs, public consultations can be regarded as a 'resource-light' way of expressing opinion on draft regulations.

However, the role of public consultations on draft SLAs in decision-making is low as government agencies developing draft regulations are often reluctant to take into account policy proposals submitted. This can be partially explained by the fact that draft SLAs are often released for public consultation after their preliminary and informal 'approval' by line government agencies (formally, interagency approval must be conducted simultaneously with the public consultation procedure, but government agencies in some cases tend to test the waters in informal inter-agency approval rounds before public consultation). Thus, public consultations rarely lead to significant changes in draft SLAs.

## **RIA of draft statutory legal acts**

A mandatory RIA procedure exists only for draft SLAs developed by executive authorities. Draft SLAs prepared by legislative or judicial bodies, or the President, are not required to undergo RIA. However, RIA does not apply to draft SLAs that:

- contain confidential information or state secrets;
- are created on the basis of orders or instructions from the President or the Chair of the Government, which must be developed within 10 days;
- are prepared to implement federal projects (except for draft acts of the Eurasian Economic Commission (EAEU) and draft acts establishing mandatory requirements);
- are part of action plans (road maps) to implement the National Technological Initiative;
- are part of action plans (road maps) to implement the Transformation of the Business Climate initiative (provided that an expert group established to engage in the development of the Transformation of the Business Climate road maps gives a positive opinion on the draft); and

- introduce changes to the EAEU commodity codes.

In practice, the government regularly uses these exceptions as justification for adopting SLAs without RIA.

RIA is aimed at identifying provisions that introduce excessive requirements and assessing positive and negative effects of the regulation proposed, as well as compliance of draft SLAs with the principles established in the federal law 'on mandatory requirements' (validity, openness, regulation predictability, etc). RIA opinion is not binding, so even in the case of a negative RIA opinion draft, SLAs may still be further considered and adopted.

As for the procedure, RIA is divided into two stages: departmental RIA and RIA of the Ministry of Economic Development.

The first stage includes:

- placement of a notice of SLA development (not mandatory);
- development of a draft act;
- preparation of an executive summary and public consultations; and
- independent anti-corruption expertise.

At the first stage, the body that develops the act independently determines the extent of the regulatory impact of the draft SLA.

The minimum term for public discussion is 10 days, and is directly proportional to the level of regulatory impact. Any user registered online at [www.regulation.gov.ru](http://www.regulation.gov.ru) may take part in the discussion. Proposals and comments received before the deadline must be reviewed by the body that develops the SLA within 20 days, and a summary of the policy proposals specifying the position of the developer must be published on the portal. If the draft SLA is reviewed following public consultations, it must also be published on the portal.

The second stage is the preparation of the Ministry of Economic Development's opinion, within 7 days for draft SLAs of low regulatory impact and within 10 days for draft SLAs of medium and high regulatory impact. The Ministry of Economic Development may hold additional public consultations on the draft if it deems them necessary (in this case, comments and policy proposals are usually submitted directly to the Ministry of Economic Development, not through [www.regulation.gov.ru](http://www.regulation.gov.ru)).

Revision of draft SLAs by the government's Commission on Implementing the Administrative Reform or its Sub-Commission, as well as relevant working groups under the Sub-Commission.

The 'regulatory guillotine', a government regulations update process launched in 2019, led to changes in the decision-making process on draft SLAs introducing, changing or abolishing mandatory requirements.

Specifically, under a new procedure, draft SLAs introducing, changing or abolishing mandatory requirements must be additionally reviewed by the government's Commission on Implementing the Administrative Reform or its Sub-Commission on Improving the Control, Supervisory and Licensing Functions (other procedures like RIA, etc, are also conducted).

In fact, draft SLAs are first considered by relevant working groups (42 industry-specific working groups, including representatives of line government agencies, key market players and business associations; eg, working groups on retail and consumer rights, healthcare, etc) under the Sub-Commission and then by the Sub-Commission or the Commission itself (if necessary; eg, in the case of unresolved disagreements).

Therefore, these working groups and the Sub-Commission (it is rather closed in terms of its composition, so approach is possible through cooperation with the Sub-Commission members) can be used as additional channels for

advocating business positions on draft SLAs. However, the effectiveness of business advocacy through these platforms largely depends on the issue explored and readiness of line government agencies to negotiate and take businesses' opinions into consideration. For example, working groups supervised by consumer protection watchdog Rospotrebnadzor often cannot resolve disagreements between the regulator and the business community, as Rospotrebnadzor tends to oppose business suggestions on issues of importance for the agency.

## Assessment of regulations implementation

Another innovation introduced as a result of the regulatory guillotine is the mandatory assessment of regulation implementation.

Under the law 'on mandatory requirements', all SLAs introducing mandatory requirements shall have a specified effective period no longer than six years. The effective period can be extended (up to a maximum of six years) following the assessment of regulations implementation (there is no set deadline for assessing the regulation's implementation, but rules for conducting the assessment define a period after which the assessment can be conducted – eg, no earlier than three years before expiry for SLAs effective for four to six years). SLAs that have no specific effective period can also be subject to the regulations implementation assessment.

The procedure for the assessment of regulations implementation is as follows:

- The Ministry of Economic Development adopts a yearly plan for assessing implementation of SLAs that contain mandatory requirements (the plan determines areas where the assessment shall be conducted and the time frames).
- Line government agencies prepare a list of SLAs that contain mandatory requirements and shall be subject to the implementation assessment and ensure public consultations on the list (minimum term is 20 days).
- Line government agencies carry out the implementation assessment and prepare a draft report on the assessment results. The report must include an analysis of whether the goals of the regulations have been met and proposals as to prolonging the effective period without amendment, amending the SLA, abolishing it in whole or in part and carrying out a real impact assessment.
- The report is subject to public consultation (the minimum term is 20 days), consideration by a working group authorised to participate in the regulations implementation assessment (representatives of line government agencies and the business community shall participate in the consideration) and subsequent consideration by the Ministry of Economic Development and the Ministry of Justice.
- If the Ministry of Economic Development and the Ministry of Justice agree with the findings and proposals of the report, the line government agency adopts decisions as to:
  - prolonging the effective period of the SLA or its separate provisions (with respect to SLAs that have an effective period), amending the SLA if necessary (with respect to SLAs that have no effective period) or abolishing the SLA in whole or in part; and
  - conducting a real impact assessment.
- If the Ministry of Economic Development and the Ministry of Justice disagree with the reporting body, the report shall be sent to the government's Commission on Implementing the Administrative Reform or its Sub-Commission for a final decision.

## Foreign Investment Advisory Council

The Foreign Investment Advisory Council (FIAC) is an advisory body under the government, headed by the Chair of the Government. The FIAC is composed of the representatives of approximately 50 major foreign investors in the Russian economy.

The FIAC's activities are divided into two segments. The first includes annual meetings with the Chair of the Government where key problems of foreign investors are articulated and priority areas of the FIAC's focus are determined. Following the results of the meetings, a list of assignments and instructions of the government is prepared.

The second includes the ongoing activity of the FIAC's working groups. Proposals are prepared with regard to its framework for general improvement of the investment climate in Russia.

Meetings of the FIAC's executive committee under the chairmanship of the Minister of Economic Development can take place several times a year.

## Parliamentary hearings

The Federation Council and the State Duma have the right to hold parliamentary hearings on issues within their competence. Members of the public have the right to participate in public hearings. Following the results of a hearing, materials are prepared that may include recommendations for legislative activities. Recommendations can be published and sent to the government.

In practice, parliamentary hearings play a minor role in the legislative process. They are usually held to generate media coverage and to draw stakeholders' attention to the topic under discussion.

## Enquiries to state authorities

The Constitution enshrines the right of citizens to send individual or collective enquiries to state and local self-government authorities.

Citizens have the right of written enquiries and to a personal appointment with a member of a state authority. Written enquiries must be considered within 30 days of the date of their registration.

These enquiries do not have any serious effect on the legislative process. For instance, there is a 'Russian public initiative' website ( [www.roi.ru](http://www.roi.ru) ) where citizens can advance various initiatives. Upon receipt of 100,000 signatures, the initiative must be considered by an expert working group under the government, which decides whether or not to develop the initiative.

If an initiative has gained more than 35,000 votes, it can be submitted to the State Duma.

Since this system was introduced in March 2013, citizens have submitted almost 20,000 initiatives. However, only 13 initiatives were then implemented at the federal level (but in most cases the initiatives implemented did not receive the required number of signatures, so their implementation was not the result of the petitions' consideration under the above-mentioned procedure).

*Law stated - 14 December 2022*

## Judiciary

Is the judiciary deemed independent and co-equal? Are judges elected or appointed? If judges are elected, are campaigns financed through public appropriation or candidate fundraising?

The Constitution identifies the judiciary as a separate, independent branch of government. The judicial system can be divided into several levels (authorities) and into several categories of jurisdiction: constitutional courts; courts of general jurisdiction, which are divided into military and civil courts; and arbitration courts. The federal and regional levels are represented by different courts within the judiciary: the regional level is represented by justices of the peace and constitutional (statute) courts (the powers of these courts are very limited); and the federal level is represented by

the system of the Constitutional Court and the Supreme Court.

The Constitutional Court considers issues of interpretation of the Constitution and the constitutionality of laws and regulations. The Supreme Court is the highest instance for cases within the general jurisdiction. Both of these courts have the right to propose legislation within the scope of their authority.

In 2020, the role of the Constitutional Court was formally strengthened; it was granted the right to review drafts of federal constitutional laws and federal laws after their final approval by the parliament to verify their constitutionality. The right to initiate this procedure lies with the President.

Since 2014, arbitration has also been included in the Supreme Court system.

The chairs and judges of the Supreme Court and the Constitutional Court are appointed by the Federation Council upon recommendation of the President. Judges of other federal courts are appointed by the President upon recommendation of the Chief Justice of the Supreme Court. However, the status of Federation Council members and judges is quite low. Prior to their appointment, the list of candidates undergoes a thorough filtering process in the Presidential Executive Office (Presidential Commission for Screening Candidates for Federal Judges).

The operation of courts is financed exclusively by the federal budget to ensure independent administration of justice. Reduction of financing of the judicial system of more than 5 per cent is possible, subject to consent of the Judicial Council.

*Law stated - 14 December 2022*

## REGULATION OF LOBBYING

### General

Is lobbying self-regulated by the industry, or is it regulated by the government, legislature or an independent regulator? What are the regulator's powers? Who may issue guidance on lobbying? What powers of investigation does the regulator have? What are the regulators' or other officials' powers to penalise violators?

There is no specific regulation of lobbying in Russia. There were repeated attempts to introduce it after the collapse of the Union of Soviet Socialist Republics. Thus, at different times, the State Duma considered at least three draft laws on the regulation of lobbying. Initiators of the draft laws were usually State Duma members from oppositional factions who did not have any significant political weight. Accordingly, there are no lobbying-related penalties.

The Constitution formally provides citizens with the right of association to protect their interests and guarantees freedom of activity of these associations. Thus, public associations – social organisations in particular – are the main bodies that will promote public interests. In practice, the most active lobbyists are industry and business associations (the Russian Union of Industrialists and Entrepreneurs, Business Russia, the Russian Grain Union and many others).

The regulator of public organisations is the Ministry of Justice. Public organisations are registered through the Ministry of Justice, which maintains a register of such organisations.

In addition to public organisations voluntarily established by citizens, the law provides for the existence of the Chamber of Commerce and Industry (CCI) and the Public Chamber.

The CCI initially aimed to represent the interests of its members in state authorities. The Public Chamber is composed of the representatives of civil society, the scientific and expert community, business representatives, etc. It has the right to carry out examinations of draft laws, draft statutory legal acts (SLAs), etc, and to send its members and representatives to participate in the meetings of committees and commissions of the Federal Assembly.

The CCI and the Public Chamber have low status and limited influence.

## Definition

### Is there a definition or other guidance as to what constitutes lobbying?

There is no formal definition of lobbying in the federal laws of Russia. However, a definition is enshrined in the Law on Lawmaking and Statutory Legal Acts of Krasnodar Krai, which is an exception rather than a trendsetter.

Legislators of the region define lobbying as 'activities of designated persons on information interaction with the lawmaking body of the region for the purpose of expressing the interests of the relevant organisations in the regional lawmaking'.

Law stated - 14 December 2022

## Registration and other disclosure

### Is there voluntary or mandatory registration of lobbyists? How else is lobbying disclosed?

There is no registration of lobbyists in the absence of regulation of lobbying activities.

Nevertheless, voluntary registration of public organisations with the Ministry of Justice is possible. Registration is required for an organisation to obtain legal capacity (ie, to receive all rights and benefits provided for by the Federal Law on Public Associations).

Registered organisations must:

- publish an annual report on the use of their property;
- inform responsible authorities about the continuation of their activities;
- inform responsible state authorities about the amount of money and other property received from foreign sources, and what the funds will be used for;
- maintain accounting and statistical reporting; and
- provide information about their activities to the responsible authorities.

Law stated - 14 December 2022

## Activities subject to disclosure or registration

### What communications must be disclosed or registered?

Public organisations are not required to disclose information about interactions with representatives of authorities, the business community, civil society, etc.

Law stated - 14 December 2022

## Entities and persons subject to lobbying rules

### Which entities and persons are caught by the disclosure rules?

Due to absence of specific regulation of lobbying in Russia such entities and persons cannot be defined.

Law stated - 14 December 2022

### **Lobbyist details**

What information must be registered or otherwise disclosed regarding lobbyists and the entities and persons they act for? Who has responsibility for registering the information?

There is no applicable law on this issue.

*Law stated - 14 December 2022*

### **Content of reports**

When must reports on lobbying activities be submitted, and what must they include?

The norm is not applicable as there is no specific regulation of lobbying in Russia.

*Law stated - 14 December 2022*

### **Financing of the registration regime**

How is the registration system funded?

No system of lobbyists' registration exists, given the absence of regulation.

Public associations are registered by the Ministry of Justice. Registration is financed by the federal budget. Legal entities and entrepreneurs are registered by the Federal Tax Service, which is also financed by the federal budget.

No separate system for physical persons' registration exists.

*Law stated - 14 December 2022*

### **Public access to lobbying registers and reports**

Is access to registry information and to reports available to the public?

There are no official registers of lobbyists.

The Ministry of Justice maintains the register of public associations that can be accessed online. Public organisations must also regularly publish the reports about their activities online, which are usually of a general nature and do not only relate to the issues of interaction with state authorities.

*Law stated - 14 December 2022*

### **Code of conduct**

Is there a code of conduct that applies to lobbyists and their practice?

There is no code of conduct enshrined in law; however, various public organisations have the right to adopt this type of document. Voluntary compliance with the code of conduct is independently regulated by each public organisation.

*Law stated - 14 December 2022*

## Media

Are there restrictions in broadcast and press regulation that limit commercial interests' ability to use the media to influence public policy outcomes?

There is no legislation restricting the use of the media by lobbyists to influence stakeholders and public policy outcomes. However, the executive branch sends businesses clear messages that using the media is counterproductive, though businesses still try to publicise and promote their interests through media channels, despite the media having a limited impact on stakeholders (as a rule, the media becomes involved only with initiatives that will have an impact on the public).

In addition, the state perceives attempts to use the media and other channels to influence public policy negatively, especially if these attempts look like interference in political processes.

For instance, in 2014, a law was passed limiting the proportion of shares owned by foreign shareholders in the Russian media to 20 per cent and prohibiting foreigners from establishing media companies in the country. In November 2017, a law was passed introducing foreign agent status for media outlets that receive foreign financing. In December 2019, the foreign agent status was extended to natural persons who are viewed as media outlets (ie, bloggers). Any articles and pieces of information released by media outlets must be accompanied by a note stipulating that they were published by foreign agents.

In addition, the foreign agent legislation requires media outlets to submit quarterly reports to the Ministry of Justice on their activities, including receipts for all outgoing expenses. The Ministry of Justice maintains a register of media outlets designated as foreign agents.

The year 2021 was marked by a crackdown on independent media with the designation of several media outlets as foreign agents in the run-up to the parliamentary elections. Generally, the list of media outlets designated as foreign agents was significantly expanded in 2021: of 103 entities on the list (both companies and natural persons), 86 were added in 2021.

*Law stated - 14 December 2022*

## POLITICAL FINANCE

### General

How are political parties and politicians funded in your jurisdiction?

The Federal Law on Political Parties allows for the formation of parties' budgets for joining and membership fees, donations, income from events and from entrepreneurial activities, and receipts from civil transactions.

State financing of political parties is also provided for: all parties with presidential candidates or candidates on a federal list for election to the State Duma that gain over 3 per cent in the election are eligible for financing from the federal budget.

The amount of funds received by the party depends on the number of votes received by its candidates on the federal list or by the presidential candidate. Currently, only five parties represented in the State Duma receive state funding. State financing of parties is provided annually during the whole term of the State Duma.

As a result, large parties have an advantage over small parties because of additional financing from the budget, which further reduces the possibility of small parties competing in elections.

Financing of politicians is only possible during election campaigns.

**Registration of interests**

Must parties and politicians register or otherwise declare their interests? What interests, other than travel, hospitality and gifts, must be declared?

Russian legislation does not regulate conflicts of interest for politicians and political parties.

However, the issue of conflict of interest is applicable to state employees. A conflict of interest is defined in Russian law as a situation in which the personal interest of a public officer affects or could affect the proper, objective and impartial performance of his or her official duties.

Personal interest is defined as income in the form of money, property, property rights, property-related services, work deliverables or any benefits received by a public officer or his or her close relatives (or both), citizens or organisations to which a public officer is connected by a familial, property, corporate or similarly close relationship.

Public officers must take measures to prevent any possibility of a conflict of interest. These measures include warning his or her employer about a potential conflict of interest.

If a state employee holds securities or any other rights for equity participation in any organisation, he or she must transfer these rights to a trustee who will be responsible for their management (trust management) in order to avoid a conflict of interest.

The same requirements apply to municipal officers, employees of the Central Bank, employees in state corporations, the Pension Fund, etc.

The need to report on a conflict of interest is also formally applied to individuals occupying public office, including the President, the Chair of the Government, his or her deputies, federal ministers, State Duma members, Federation Council members, and judges of the Supreme Court and Constitutional Court.

These individuals are also subject to the requirement to transfer the rights to shares in various organisations to trust management.

In practice, compliance with the requirements for registering a conflict of interest is not strictly adhered to. In particular, the practice of registering shares in businesses for adult children or the practice of fictitious divorces is widespread in order to preserve business management within the family. Many government officials actually own accounts and property abroad.

However, the constitutional amendments of 2020 explicitly prohibit high-ranking governmental officials (the President, members of the State Duma, senators, federal ministers, heads of federal government bodies, ombudsman, heads of the constituent units, judges, etc) from opening bank accounts or keeping any valuables in foreign banks.

**Contributions to political parties and officials**

Are political contributions or other disbursements to parties and political officials limited or regulated? How?

According to the law, donations are not allowed from, among others: foreign individuals and legal entities; foreign states; Russian legal entities with foreign equity over 30 per cent; legal entities registered less than one year before the donation; and non-profit organisations receiving financing from abroad (foreign agents).

The maximum amount for annual donations is limited for different types of donors. The total maximum amount of

annual donations is also limited.

Unofficial political organisations operate in Russia, despite the fact that unapproved financing by the private sector of political and electoral campaigns is prohibited.

*Law stated - 14 December 2022*

## Sources of funding for political campaigns

Describe how political campaigns for legislative positions and executive offices are financed.

Electoral campaigns of candidates for elective offices are financed through election funds. These funds are generated after the nomination of a candidate or a list of candidates by a party, or after individual nomination of candidates. The maximum amount of expenditure from election funds is set specifically for different levels of elections (ie, regional or federal).

Electoral funds can be generated from:

- candidates' or electoral associations' own funds;
- funds allocated to a candidate by the electoral association that nominated him or her; and
- voluntary donations from citizens and legal entities.

In this case, restrictions can be established with regard to the maximum amount of money in the election fund obtained from various sources.

Among others, the following are prohibited from making electoral donations:

- foreign states, organisations and citizens;
- state authorities;
- Russian legal entities with foreign equity exceeding 30 per cent;
- Russian legal entities with state participation exceeding 30 per cent;
- anonymous benefactors;
- international organisations and movements;
- legal entities registered less than a year before giving the donation; and
- non-profit organisations receiving financing from abroad (foreign agents).

All activities relating to the organisation of electoral campaigns must be financed from electoral funds. In practice, candidates form 'black cash funds', which are unregistered electoral funds through which the activities of employees, work, goods and services are traditionally paid for, the illegality of which can be hard to prove. In recent years, the formation of black cash funds has resulted in a number of criminal cases, mostly against opposition politicians.

At most levels of the elections, the Central Election Commission must publish information online about major financial transactions of candidates or parties, legal entities that have given large donations and the number of citizens who have given large donations to the electoral fund. In practice, opportunities for obtaining legitimate and substantial donations for political campaigns are limited. Major financial channels are controlled by the ruling elite, which reduces the chances for the opposition to compete in equal conditions.

*Law stated - 14 December 2022*

### **Lobbyist participation in fundraising and electioneering**

Describe whether registration as a lobbyist triggers any special restrictions or disclosure requirements with respect to candidate fundraising.

There is no separate regulation for lobbyists. A unified procedure of disclosing information about the activities of legal entities exists, including information about the financing of political campaigns.

*Law stated - 14 December 2022*

### **Independent expenditure and coordination**

How is parallel political campaigning independent of a candidate or party regulated?

The Federal Law on Basic Guarantees of Electoral Rights declares that candidates and electoral associations independently determine the contents, forms and methods of their campaigning, independently hold the campaign and have the right to involve other persons in it.

The same law says that citizens and public associations 'have the right to hold election campaigning in the forms permitted by law and by lawful methods'.

Therefore, the law does not prohibit public organisations and individuals not affiliated with candidates and political parties to hold an independent campaign for or against a candidate or party. Restrictions are applied to the form and methods of campaigning, which are established by the Federal Law on Guarantees of Electoral Rights.

Payment for election campaigning is possible only through a candidate's electoral fund. This means that campaign materials must be produced free of charge. Representatives of the media are prohibited from engaging in campaigning.

The law does not regulate the coordination of parallel campaigning by representatives of candidates; however, because there is a ban on bribing voters, this activity must be carried out free of charge. In practice, an independent parallel campaign (ie, carried out by non-affiliated organisations or individuals) can be considered as bribery of voters, especially if evidence is found that this parallel campaign was deliberately orchestrated by the candidate's representatives.

In general, the state has a negative attitude towards the public manifestation of support of certain candidates. This mostly concerns the support of opposition candidates and campaigning held outside the candidates' headquarters.

*Law stated - 14 December 2022*

## **ETHICS AND ANTI-CORRUPTION**

### **Gifts, travel and hospitality**

Describe any prohibitions, limitations or disclosure requirements on gifts, travel or hospitality that legislative or executive officials may accept from the public.

It is prohibited to receive gifts (except for simple gifts that do not cost more than approximately US\$40 and gifts at hospitality events) in connection with the official capacity or the performance of the official duties of individuals who:

- occupy public office;
- occupy the public office of a constituent entity;
- occupy municipal offices;

- are public and municipal officers; or
- are employees of the Bank of Russia.

Public officials are also banned from travelling abroad at the expense of individuals and legal entities unless there is official government permission for the trip.

Members of the State Duma and the Federation Council are not fully banned from receiving gifts: gifts from official events are recognised as government property and are to be formally accounted for. These gifts can be bought out of the federal property and back into possession of a deputy or a senator. Nevertheless, there is a ban set for them as well as for public officers on receipt of monetary rewards, loans, services, payment for entertainment, leisure activities, transport expenses and other compensations in connection with the performance of their official duties.

*Law stated - 14 December 2022*

## **Anti-bribery laws**

What anti-bribery laws apply in your jurisdiction that restrict payments or otherwise control the activities of lobbyists or holders of government contracts?

There is no separate regulation for lobbyists but there is extensive general anti-corruption legislation. Most of the laws and regulations are aimed at minimising corruption among public employees and individuals holding public office.

The main law in this field is the Federal Law on Counteracting Corruption, which establishes the fundamental principles of corruption control, and the legal and organisational basis for preventing and fighting corruption.

Additionally, Russia has fully or partially ratified the following international conventions in the field of combating corruption:

- the United Nations Convention against Corruption;
- the Criminal Law Convention on Corruption;
- the United Nations Convention against Transnational Organized Crime; and
- the Organisation for Economic Co-operation and Development Convention on Combating Bribery of Foreign Public Officials.

According to the National Anti-Corruption Plan 2018–2020, the government was supposed to submit draft legislation providing for the improvement of anti-corruption standards for employees in state corporations, state extra-budgetary funds, public companies, etc, before November 2018. However, the bills were called off from the State Duma by the government and have not yet been resubmitted.

Responsibility for corruption is established by various provisions of the Criminal Code.

However, anti-corruption laws are not effectively implemented, as evidenced by the corruption cases that have frequently arisen, and when they are implemented, they are not enforced in a manner that is equal for all social groups. Forfeiture of property as a measure of restraint of corrupt practices is not frequently used in the field of fighting corruption.

*Law stated - 14 December 2022*

## Revolving door

Are there any controls on public officials entering the private sector after service or becoming lobbyists, or on private-sector professionals being seconded to public bodies?

Restrictions are established in this field in accordance with the law on avoiding conflicts of interest. If a public officer manages any subordinate organisation within his or her authority, employment in this subordinate organisation is possible only subject to permission granted by a special commission on prevention of conflicts of interest.

Additionally, when entering employment, public officers are required to notify their future employer of the fact that they have worked in public service, and the employer must notify representatives of the state of their previous place of employment about the conclusion of an agreement with the employee within 10 days.

All the above requirements apply to public officers for two years after their departure from public service.

The practice of the employment of former public officers in private companies is widespread. On leaving public service, public officers sometimes hold positions on the boards of large companies, government relations units, etc.

*Law stated - 14 December 2022*

## Prohibitions on lobbying

Is it possible to be barred from lobbying or engaging lobbying services? How?

There is no specific regulation, but there are general rules regarding the registration of legal entities if administrative or other offences are committed. In practice, entrepreneurs establish new legal entities if the original entities have been liquidated.

*Law stated - 14 December 2022*

## RECENT CASES AND SANCTIONS

### Recent cases

Analyse any recent high-profile judicial or administrative decisions dealing with the intersection of government relations, lobbying registration and political finance?

In 2012, a law was passed that introduced the status of foreign agent for non-profit organisations receiving foreign financing or for those of foreign origin. The status of a foreign agent imposes a ban on financing of electoral campaigns.

Since the adoption in 2012, the foreign agent legislation has been amended several times and, in fact, tightened.

At the end of November 2017, a law was passed that stipulates that media outlets receiving foreign funding are considered foreign agents. The law requires these media outlets to submit a quarterly report to the Ministry of Justice on their activities, including receipts for all outgoing expenses. Any articles, etc, released by these outlets must be accompanied by a note stipulating that they were published by foreign agents. In December 2019, the foreign agent status was extended to natural persons who are viewed as media outlets (ie, bloggers).

In December 2020, a law was adopted to extend the foreign agent status to public associations that operate without registering a legal entity, as well as to persons who take part in political activities in Russia on behalf of a foreign source. These persons will be prohibited to work in state and local governments and denied access to state secrets. In this regard it is noteworthy that the law broadly defines political activity: it includes organisation of public assemblies

such as protests, demonstrations, public appeals to state authorities, actions aimed at adopting, amending and repealing regulations, distribution of evaluations of decisions made by state authorities and implemented policies.

The law also states that if a person who is not a Russian citizen and permanently resides in another country intends to carry out activities associated with the functions of a foreign agent in Russia, they must notify the respective federal body before entering Russia.

Also, 2020 saw the adoption of a law to introduce criminal liability for malicious violation of the responsibilities by foreign agents. Punishment ranges from fines up to approximately US\$4,100 to five years of imprisonment. In addition, in February 2021 amendments to the Code on Administrative Offences were passed to introduce new penalties for violation of the foreign agent legislation (eg, for distribution in mass media of information about a non-profit organisation, public associations and natural persons designated as foreign agents without notification of their foreign agent status).

The foreign agents' legislation continued to develop in 2022. In July, the updated law was officially published to regulate the foreign agent status (entered into force in December). Under the law, organisations (even commercial ones) or individuals can be recognised as 'foreign agents' if they receive foreign support, are under foreign influence, as well as carry out political activities. Associations of employers (including business associations in this legal form) and trade chambers are excluded from the scope of the law. The designated entities would not be allowed, inter alia, to participate in the work of any advisory or expert structures interacting with and operating under the state bodies.

Another significant development of 2022 was the adoption of the law to penalise various forms of cooperation or communication with foreign NGOs and other institutions seen as 'detrimental for Russia's national security'. The law, inter alia, penalises 'public calls for activity aimed against Russia's national security' and expands the grounds for criminal punishment for funding of or participation in activities of NGOs designated as 'undesirable organisations' in Russia.

*Law stated - 14 December 2022*

## Remedies and sanctions

In cases of non-compliance or failure to register or report, what remedies or sanctions have been imposed?

There is no separate regulation for lobbyists. General sanctions for violation of the laws on corporate reporting are applied. In particular, penalties are established for failure to submit reports or for serious errors in reporting.

*Law stated - 14 December 2022*

## UPDATE AND TRENDS

### Key developments of the past year

Are there any emerging trends or hot topics in government relations, lobbying or related law and regulation? Have changes occurred recently or are changes expected in the near future (through either legislation or court decisions) that will have an impact on the practice of government relations or lobbying disclosure?

The 'special military operation' became an important driver of change for businesses in Russia. Since March, many companies have declared their exit from the Russian market, suspension of investment or reduction in production to basic products only.

Law-making largely boiled down to reacting to imposed sanctions and preparing anti-crisis support measures in the new environment. To ensure that upcoming issues are addressed swiftly, a fast-track procedure for adopting legal acts was adopted that makes it possible to adopt a regulation within a short time frame if need be.

Overall, given the current political and economic situation, which, to a large extent, is impacted by the special military operation, the opportunities to represent businesses through interaction with public authorities are shrinking even more (the government and other institutions are focused on creating the conditions for carrying out the special military operation).

*Law stated - 14 December 2022*

## Jurisdictions

	<b>Brazil</b>	MJ Alves & Burle Advogados e Consultores
	<b>Eurasian Economic Union</b>	Kesarev
	<b>European Union</b>	Loyens & Loeff
	<b>Italy</b>	Gianni & Origoni
	<b>Japan</b>	Miura & Partners
	<b>Kazakhstan</b>	Aretera Public Affairs
	<b>Qatar</b>	SHE Institute
	<b>Russia</b>	Kesarev
	<b>Taiwan</b>	Formosa Transnational Attorneys at Law
	<b>Ukraine</b>	Aretera Public Affairs
	<b>United Kingdom</b>	Bates Wells
	<b>USA</b>	Squire Patton Boggs