

Overview of Data

With scores below global averages on most key measures of governance and government integrity, transactions in Russia are subject to a high level of third-party corruption risk. FCPA enforcement is moderate to high in relation to the size of the economy and shows a concentration of cases in oil and gas and medical/pharmaceutical sectors.

Corruption and Governance Indicators	Russia	G7 Average
Transparency International Corruption Perceptions Index	28	73
World Bank Control of Corruption Score	21	87
World Justice Project Rule of Law Score	47	76
Major Correlates of Corruption		
Nominal GDP Per Capita Percentile Rank	66	89
World Bank Government Effectiveness Score	51	89

**All indicators are scores/100 or are percentile ranks, 100=best. Some scores have been adjusted accordingly. 1-33 34-66 67-100.*

World Bank Enterprise Survey Responses	Russia	Top 10 Countries
Share of firms reporting at least one bribe request	40%	1.4%
Share of firms expected to give gifts to secure government contract	46%	1.9%
Share of firms expected to give gifts to officials to “get things done”	41%	1.5%
Share of businesses reporting corruption is a major constraint	25%	7.5%

Illustrative FCPA Cases (as reported)

Total FCPA Enforcement: 17 Cases

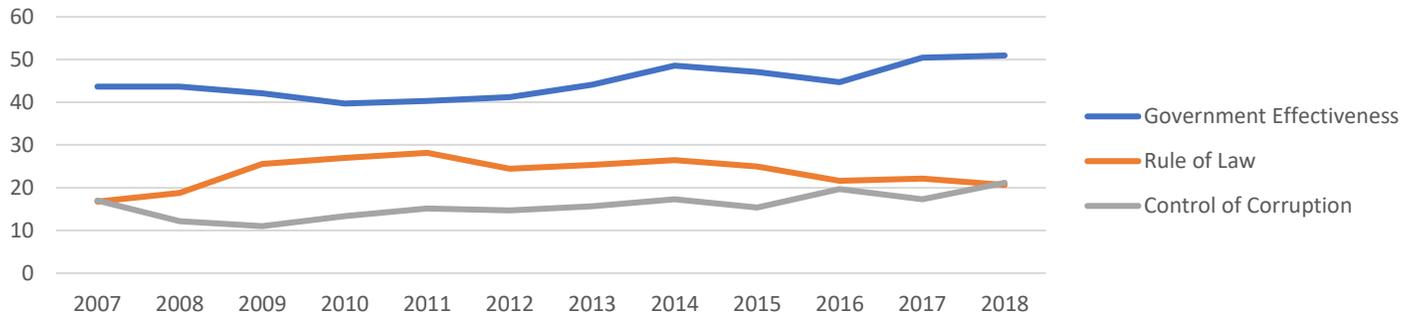
- **Transport Logistics International**— A US transport firm allegedly paid USD 2 million between 2004 and 2014 to Russian entity TENEX, a subsidiary of the Russian State Atomic Energy Corporation, to secure contracts to transport nuclear materials.
- **Bio-Rad Laboratories**— The life-sciences company settled in 2014 for alleged payments to offshore companies for services they were considered deemed unlikely to perform. Enforcers considered that these commissions were likely to be used to facilitate unlawful payments to Russian officials.
- **Analogic**— The medical technology company’s Danish subsidiary and Russian distributors reportedly transferred USD 16 million to unknown locations between 2001 and 2011. Some bribes to “foreign officials” were reportedly paid to Russian doctors.
- **Eli Lilly**— Russian subsidiary allegedly payed millions to “create sales potential” among government officials. Specific agreements were reportedly not obtained through this practice, but the company was nonetheless held liable for its subsidiary’s actions. A multi-jurisdictional case was settled in 2013.

Information Accessibility and Transparency

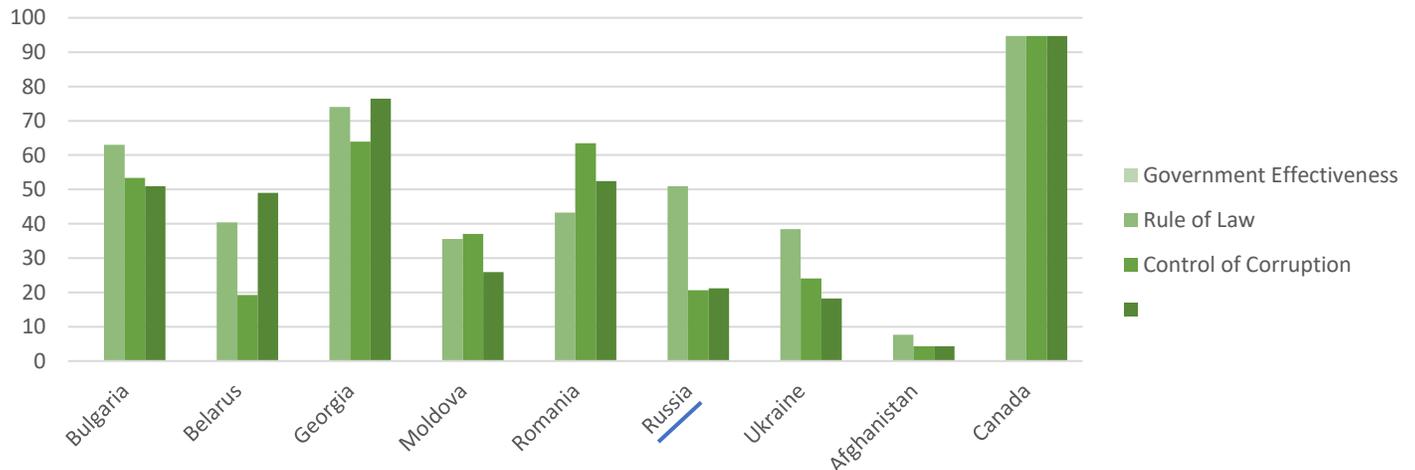
Availability of Records	●	Most information is readily available online, including shareholding and blocked vendor information, via national-level registries.
Freedom of Press	●	Reporters without Borders rank 148/180 (180=worst) Freedom House score 83/100, “not free” (100=least free)
Language Accessibility	●	Cyrillic script and the Russian language may present difficulties in machine-translation-led desktop research.
Financial Disclosure	●	Tax Justice Network Financial Secrecy Score—64/100 (100=most secret).

● Poor ● Moderate ● Accessible

Trendlines—World Bank Worldwide Governance Indicators (100=best)



Country Comparison—World Bank Worldwide Governance Indicators (100=best)



Context: Corruption in Russia

Corruption is a significant risk in Russia in all business sectors and in all areas of public administration. Executives of Russian companies often hold political office and PEP alerts are common for Russian entities. FCPA enforcement patterns indicate that many Russian doctors will be considered “foreign officials” by US regulators. Russian SOEs have been the subjects of numerous high-profile corruption scandals. Areas of concern include natural resource sectors dominated by current or former SOEs, including the oil and gas industry. Corruption risks are compounded by other risks such as expropriation and sanctions in some sectors. Multiple international sanctions affect Russian entities, and subjects with ties to activities in Crimea face elevated sanctions risks. Shareholding and financial information for Russian entities can be opaque. Vectors of low-level corruption include political donations to local politicians and bribes to local officials for permits or other administrative transactions.

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