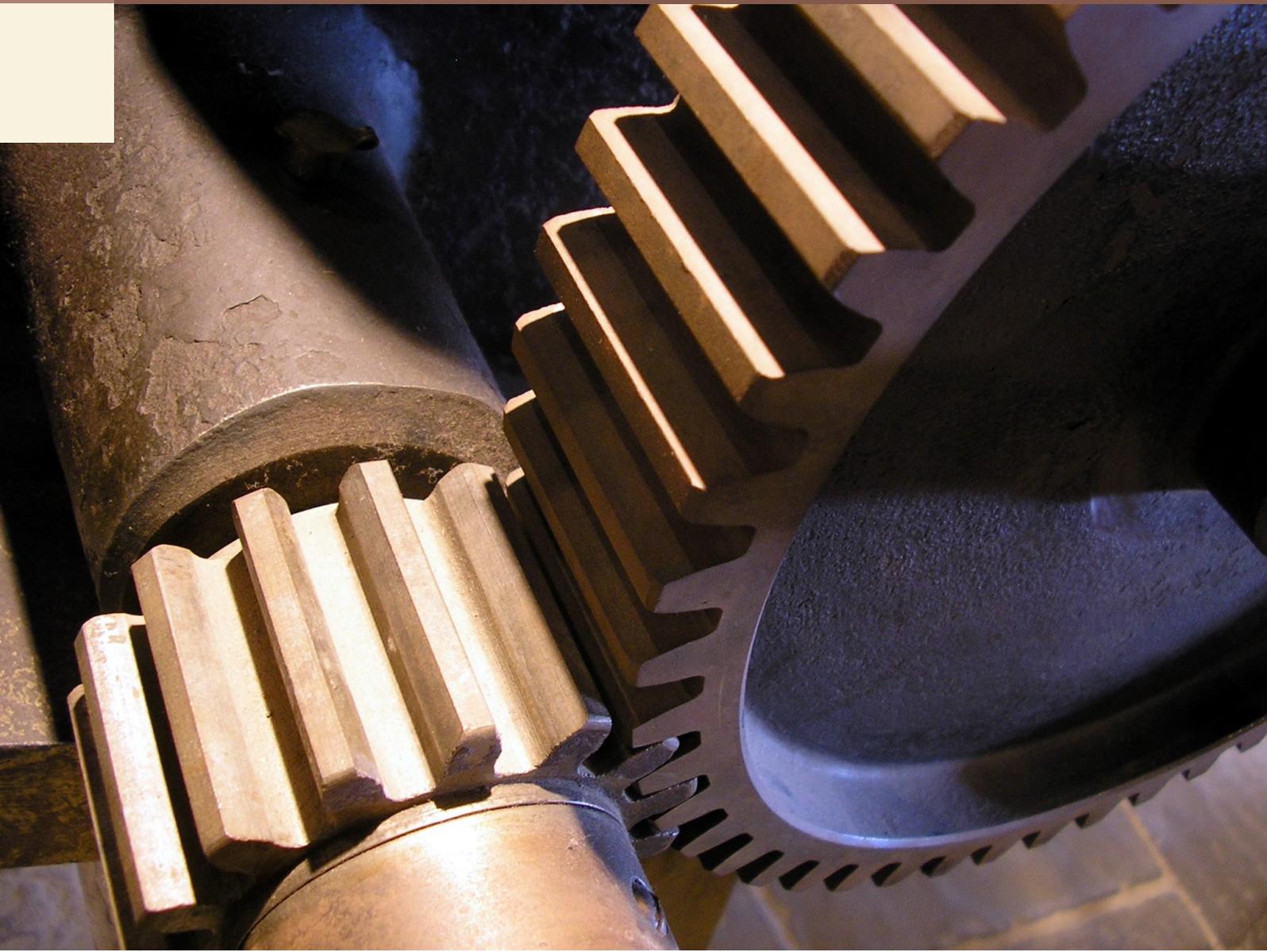
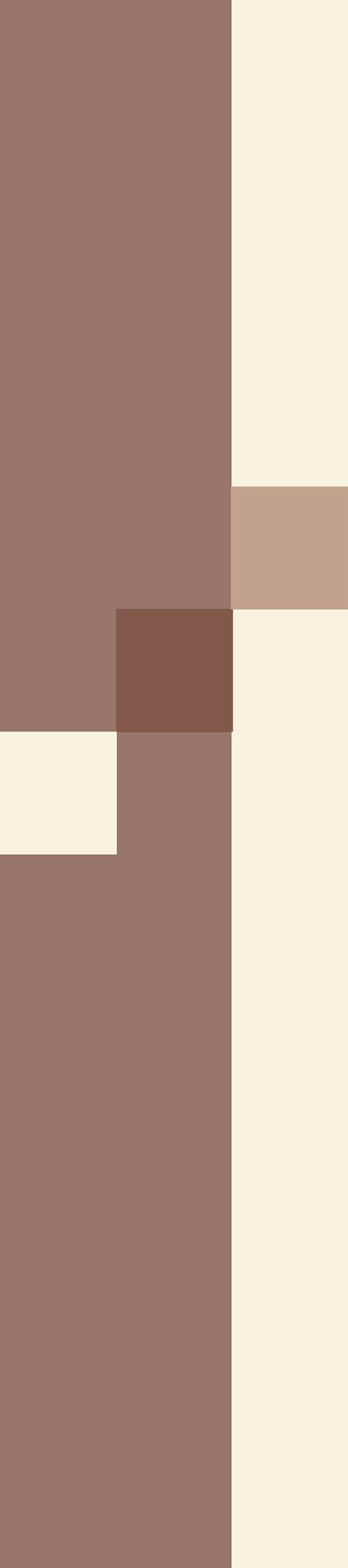

A · L · R · U · D

LAW FIRM SINCE 1991

GENERAL INFORMATION CONCERNING CONDUCTION
OF INSPECTIONS BY FAS RUSSIA





A · L · R · U · D

LAW FIRM SINCE 1991

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LEGAL FRAMEWORK

- Federal Law dated July 26, 2006 No.135-FZ "On Protection of the Competition" (**Competition Law**)
- Federal Law dated December 26, 2008 № 294 "On Protection of Legal Entities and Entrepreneurs while Implementation of State and Municipal Control (Supervision)"
- Order of FAS Russia dated May 25, 2012 No. 340 "On Approval of the Administrative Regulation of the Federal Antimonopoly Service on the Implementation of the State Function of Conduction of Inspections on Compliance with the Antimonopoly Legislation" (**Regulation**)

TYPES OF INSPECTIONS

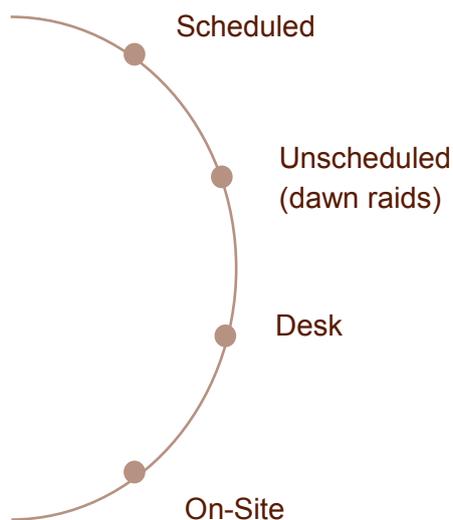
Character of controlling actions:

scheduled and unscheduled inspections

Place of conduction and character of the process of data collection:

desk and on - site inspections

INSPECTIONS CONDUCTED BY FAS RUSSIA



SCOPE OF INSPECTIONS

Practically speaking, FAS Russia may request any information, search any documents that might be required in case such request or actions are motivated.

This approach can be justified by the court practice.

According to the Decision of the Presidium of the Supreme Arbitration Court of the Russian Federation No. 8039/12 as of November 27, 2012, the requests of FAS Russia are considered as motivated if they contain a reference to a procedural reason of requesting of information (for example, reference to particular case) and legal basis (Article 25 of the Competition Law).

RIGHTS OF OFFICIALS OF ANTIMONOPOLY AUTHORITY IN RELATION TO CONDUCTION OF INSPECTIONS

Officials of FAS Russia have the following rights during conduction of inspections:

- the right to unimpeded access to the territory and (or) into the premises, buildings of the inspected entity (except of the houses and private property of the employees of the inspected entity), **upon presentation of their official identification cards and order of the Head of the antimonopoly authority**
- to receive documents, explanations in written or oral form, information, including commercial, official and other secrets protected by law, as well as information constituting a state secret, if the member of the inspection has duly completed admission document to the information of the appropriate level of confidentiality, including official electronic correspondence necessary for antimonopoly authority after motivated request within the prescribed period in accordance with its rights and duties

- the right to unimpeded examination of territories, buildings and premises occupied by the inspected entity (except of the houses and private property of the employees of the inspected entity), documents and information (data) contained in any of its data carriers (if it is required during the inspections it is not prohibited **to take photos, to film the process of inspection and also to make copies of the documents provided**)

“

The entrepreneurs should not live in continuous expectation that somebody will suddenly come to them with another inspection. He should not be afraid that any of his actions can be brought easily under some article or under a penalty.

— Vladimir Putin, the Russian President, 2015

DUTIES OF OFFICIALS OF ANTIMONOPOLY AUTHORITY DURING CONDUCTION OF INSPECTIONS

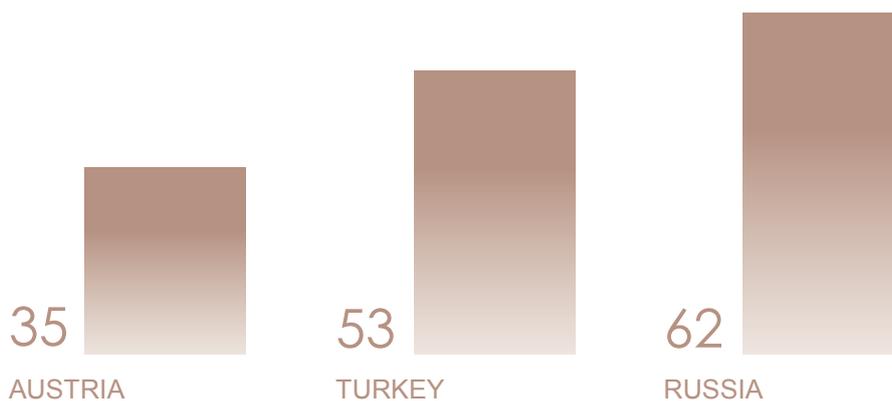
Officials of FAS Russia have the following duties during inspections:

- to comply with the legislation of the Russian Federation, respect rights and legitimate interests of the inspected persons/entities
- to carry out an inspection **on the basis of the order** of the Head of the antimonopoly authority
- to conduct an inspection **only during execution of official duties**, to carry out an on - site inspection only upon presentation of identification cards, copies of the order (instruction) of the Head (Deputy Head) of the antimonopoly authority
- not to prevent the Head, other officer of the inspected entity or authorized representative of the inspected entity from presenting during the inspection and giving explanations on matters relating to the inspection
- to provide information and documents related to the inspection to the Head, other officer or to the authorized representative of the inspected entity presenting during the inspection
- to familiarize the Head, other officer of the inspected entity or authorized representative of the inspected entity with the results of the inspection
- not to require from the legal entities or entrepreneurs the documents and other information, presentation of which is not stipulated by the legislation of the Russian Federation
- to take into account while determination of measures to be taken upon the results of inspection and violations revealed the severity of violations, their potential danger to life, health of people, animals, harm to plants, environment, national security, for the occurrence of natural and technogenic disasters, and also not to allow unjustified restriction of the rights and legitimate interests of individuals, including entrepreneurs, legal entities
- to prove the reasonableness of their actions if they are appealed by legal entities and entrepreneurs in accordance with the legislation of the Russian Federation
- to observe the time limits of the inspection
- before the beginning of the on - site inspection at the request of the Head, another officer of the inspected entity and the authorized representative of the inspected entity to familiarize them with the provisions of the administrative regulation which governs the procedure of conduction of inspections
- to make a record upon conduction of the inspection in the register of inspections
- carry out a public function in accordance with the Regulation
- not to disclose information constituting state, commercial, official and other secrets protected by law, obtained by the antimonopoly authority, except in cases established by the legislation of the Russian Federation

GENERAL PROVISIONS RELATING TO INSTECTIONS

- 2 independent witnesses are required during the process of conduction of the inspection
- Upon the request of the inspected entity, a delivery-acceptance act may be drawn up after provision of the documents to officials of FAS Russia
- Records shall be made in respect of actions taken by officials of FAS Russia, written comments may be made to the relevant records
- According to the Regulation as a general rule, an inspection cannot last more than 30 days, but if FAS Russia needs additional time, the period of inspection may be extended, but only on the basis of the respective order of the Head of FAS Russia and not more than up to 2 months
- An inspection finishes with formation of the report in 2 copies in Russian language that shall be signed by all members of the inspecting commission. Misprints and corrections are not allowed. The full list of requirements for the report is listed in the Regulation
- The report shall be handed in to the inspected entity not later than the last day of the inspection. During the next 15 days from the date of its receipt, the inspected entity may submit written objections to the report, which are then shall be attached to it

THE NUMBER OF UNNANNOUNCED INSPECTIONS UNDER ARTICLE 11 OF THE COMPETITION LAW IN 2013



“The next year there would be a special register which will include the list of organizations, inspections and justification of their need — it will allow to cut unmotivated or, even worse, custom-made visits of inspection bodies. It is necessary to refuse from the principle of total and infinite control.

— Vladimir Putin, the Russian President, 2014

SCHEDULED INSPECTIONS

Scheduled inspections may be conducted:

- Upon expiration of 3 years from the date of formation or the state registration of legal entities
- Upon expiration of 3 years from the date of the last scheduled inspection

Scheduled inspections are conducted only in respect of those legal entities that are included in the relevant consolidated plan of inspections that is available at:

<http://fas.gov.ru/about/plans/>

or

<http://plan.genproc.gov.ru/plan2016/>

The legal entity shall be notified on the coming inspection at least 3 working days before the inspection has actually occurred by sending of a copy of the order on conduction of the inspection.



1 time
in 3 years
**no more*

CONDUCTION OF SCHEDULED INSPECTIONS

“ Advice

If your company is included into the consolidated plan of inspections or you have received a notification of the scheduled inspection, we recommend you to start preparing for the inspection beforehand and turn for legal assistance

“ Advice

Do not impede officials of FAS Russia during the inspections, provide them technical assistance

Grounds :

There are the following ground for conduction of the scheduled inspections:

1. Expiration of 3 years from the date of formation or the state registration of legal entities
2. Expiration of 3 years from the date conduction of the last scheduled inspection.

Order of the Head of FAS Russia

Notification of the scheduled inspection (no later than **3 business days before**)

Conduction of inspections includes the following activities:

1. Examination of the territory, buildings, constructions
2. Receipt of documents and information upon request.

Prolongation of the term of inspection

No

Yes

Order on prolongation and on carrying out of additional actions during the inspection (**not more than for 2 months**)

Act upon the results of the inspection is presented to the authorized representative of the inspected entity not later than on the last day of the inspection

Within 15 days of receipt, the inspected entity may file objections to the act, then Deputy Head of FAS Russia make a decision on this matter



Scheduled inspections are carried out in respect of the legal entities included into the consolidated plan of inspections available at:

<http://fas.gov.ru/about/list-of-plans/plans.html?id=1632> or

<http://plan.genproc.gov.ru/plan2016/>



The notification is made by sending a copy of the order regarding conduction of the inspection.

The term of inspection: not more than 1 month (from the date specified in the Order)



Upon the results of conduction of the inspection, records are prepared

Legal entities are entitled to include their comments to the records

Upon the request of the inspected entity, the statement of transfer and acceptance of provided copies of documents during the inspection can be drafted

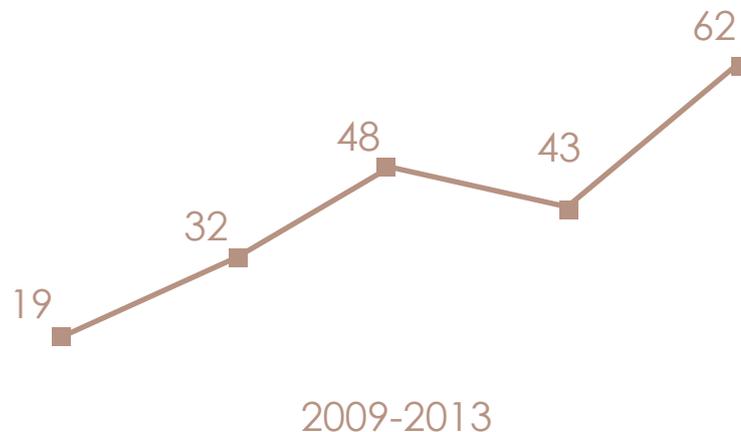
UNSCHEDULED INSPECTIONS

It may be conducted on the grounds set forth in the Competition Law and the Regulation that are the following:

- detection by FAS Russia of violation of the antimonopoly legislation
- materials received from the law enforcement or other government bodies
- application of individuals and legal entities, information from mass media
- order of the President or the Government of the Russian Federation
- expiry of the term of execution of the order issued upon the consideration of the case on violation of the antimonopoly legislation

Notification on conduction of the inspection should be made not less than 24 hours before its factual conduction except of the cases when the inspection is conducted on the basis of Articles 11 and 16 of the Competition Law (anticompetitive agreements of economic entities and state authorities).

DYNAMICS OF UNSCHEDULED INSPECTIONS UNDER ARTICLE 11 OF THE COMPETITION LAW



“Today carrying out of “dawn raids” became a usual rule... These are sudden inspections with use of procedures of examination, copying of electronic data and information, receiving written explanations. And if by the current legislation it is possible to check the economic entity upon observance of a huge number of formal procedures, for “dawn raids” there is one exception - we organize the inspection suddenly, warning nobody.

— Andrey Tsarikovsky, the Deputy Head of FAS Russia, 2011

CONDUCTION OF UNSCHEDULED INSPECTIONS (DAWN RAIDS)

“ Advice

For the most successful passing through inspections by the companies, we recommend the following:

1. To develop internal documents and instructions on how to act when the inspection is being conducted
2. To conduct thematic role seminars recreating a situation of dawn raid inspection (mock-raids)
3. To conduct trainings and seminars for the key employees of the company

“ Advice

Do not impede officials of FAS Russia during the inspections.

It is possible bringing inspected entity to administrative responsibility for such actions.

Grounds:

1. Detection by FAS Russia of violation of the antimonopoly legislation
2. Materials received from the law enforcement or other government bodies
3. Application of individuals and legal entities, information from mass media
4. Order of the President or the Government of the Russian Federation
5. Expiry of the term of execution of the order issued upon the consideration of the case on violation of the antimonopoly legislation

Order of the Head of FAS Russia

Notification of the unscheduled inspection (not less than 24 hours before the inspection), except for the cases when inspections are carried out on the basis of possible breach of Article 11, 16 of the Competition Law (anti-competitive agreements of economic entities and state authorities).

Conduction of inspections includes the following activities:

1. Examination of the territory, buildings, constructions
2. Receipt of documents and information upon request

Prolongation of the term of inspection

No

Yes

Order on prolongation and on carrying out of additional actions during the inspection (not more than for 2 months)

Act upon the results of the inspection is presented to the authorized representative of the inspected entity not later than on the last day of the inspection.

Within 15 days of receipt, the inspected entity may file objections to the act, then Deputy Head of FAS Russia make a decision on this matter.

i

Inspections carried out based on anonymous statements may be declared illegal.

i

It is necessary to examine the provisions of the order (grounds, purpose, subject of inspection, etc.) and powers of the officials.

! Information concerning the officials on their identification cards must be the same as information indicated in the Order regarding the persons who are entitled to carry out the inspection.

The term of inspection: not more than 1 month (from the date specified in the Order).

i

Upon the results of conduction of the inspection, records should be prepared (legal entities are entitled to include their comments to the records). Upon the request of the inspected entity, the statement of transfer and acceptance of provided copies of documents during the inspection should be drafted.

THREE GOLDEN RULES FOR DAWN RAIDS

1. Keep calm: you always have enough time to consider the answers.

Consult with lawyers if you consider that answers to questions in the process of inspection can entail negative consequences for you personally and your company.

Surely render technical assistance to inspectors within the process of conduction of an inspection.

2. Carefully study documents of inspection.

In the order on carrying out of an inspection there can be technical mistakes.

Study documents of experts and witnesses: there can be interested persons among them and results of the inspection conducted with their participation are subject to the appeal.

3. Document check: conduct video and audio recording.

Record all actions of participants of inspection, write down questions and answers to them.

Define the list of the provided information and documents. You will be able to operate with these materials confirming violation of your rights at the appeal of actions of inspection.

“

We have been tortured with inspections and with the attacks. It is necessary that our law enforcement agencies and authorities ceased to nightmarize business.

Dmitry Medvedev, the Russian Prime Minister, 2008

ALGORITHM OF ACTIONS DURING THE FIRST HOURS OF INSPECTION

1. Do not allow participants of inspection to get into the premises until they hand to the CEO the copy of the order on carrying out the inspection and show the identification cards. Prepare some copies of the order: the management of the company has to have information on participants of inspection should be always at hand.
2. Appoint the authorized representative of the company with whom participants of inspection have to contact on any questions regarding the inspection (Clause 3.34 of Regulation). Hand to the officials of the inspection the copy of the order on appointment of such person.
3. It will allow to control the volume and character of information provided to the officials. It is desirable to assign the person who will fix all actions implemented to each participant of the inspection.
4. Estimate your own opportunities taking into account the experience of participation in inspections and experience connected with collaboration with law enforcement agencies, interactions with antimonopoly authority, knowledge of the antimonopoly law and also other available resources.
5. If help of external consultants is necessary, urgently contact them and direct the copy of the order on carrying out of the inspection.
6. Quickly inform on the conducted inspection representatives of the company which participation can be required during the dawn raid (heads of relevant departments, lawyers, system administrators, representatives of department on public relations, secretariat) and instruct them that interaction with participants of inspection for serious issues should be carried out through the authorized representative of the company.
7. The authorized representative should inform all employees on inspection by e-mail. Thus, it is necessary to specify that the company became object of inspection; it is not necessary to provide any information and to give evidence to inspectors on their own initiative, and it is not permitted to try to hide or destroy any documents; it is also inadmissible to discuss investigation with the third parties.
8. Consequently, please watch the course of inspection conducted and render technical assistance to inspection following the "golden rules".



It is a standard algorithm, which can be modified according to a concrete situation. However, it is anyway reasonable to adhere to the specified recommendations.

“At last, "dawn raids" became a reality. By conduction of dawn raids the number of revealed written cartel agreements increased. We find them in some sectors nearly at all inspected entities. One of such cartel agreements is active from 2000. We have also admissions of a significant amount of the companies, wiretaps of telephone conversations.

— Igor Artemyev, the Head of FAS Russia, 2011

COURT AND ADMINISTRATIVE PRACTICE

- **Decision of the Central district court of Voronezh on the Case No. 2-229/12 as of January 24, 2012**
- **Ruling of the Arbitration Court of the Moscow Region to the Case No. A40-161484/12 as of April 30, 2015**

January 24, 2012

April 30, 2015

Brief description: the antimonopoly authority shall take all necessary measures for answering requests of individuals in case the request was sent by e-mail, even if there is no information on the name of the applicant and his/her contacts since electronic form of messages allows contacting the applicant.

According to the materials of the case, Mr. Bepalov B.I. sent through the e-mail (the request was sent from e-mail address vl.drakula@gmail.ru) to FAS Russia the request on check of economic concentration on the market of baby foods.

FAS Russia did not challenge the fact of the receipt of the above-mentioned message but declared that the request did not contain e-mail or post address of the applicant and therefore, information was not sufficient for identification of an applicant (ALRUD: they were not indicated in the special form of the request attached to the e-mail, although it is always possible to know the address from which the message was sent by e-mail).

The court declared that Russian legislation does not contain provisions stating that refusal to answer electronic messages by state bodies or agencies is allowed in the absence of the above-mentioned information, therefore the claim of Mr. Bepalov B.I. shall be satisfied and FAS Russia shall take all necessary measures in order to answer the request.

<https://rospravosudie.com/court-centralnyj-rajonnyj-sud-g-voronezha-voronezhskaya-oblast-s/act-104534617/>

Brief description: Unscheduled inspections conducted by FAS Russia on the basis of anonym applications are unlawful.

OJSC Galopolymer and LLC Galopolymer Kirovo-Thcepetsk filed a claim with the court on admission of unscheduled inspections unlawful in case the inspections had been conducted on the basis of anonym application. As a result of such inspection, FAS Russia received documents that were further used in proceedings against OJSC Galopolymer and Galopolymer Kirovo-Thcepets LLC in respect of their participation in a cartel agreement on the market of liquid caustic soda.

The courts established that the anonym applications were sent from the same IP address and nonexistent e-mail boxes. Herewith, e-mail boxes were created at the same day within several minutes.

The courts stated that Russian legislation provides for possibility to conduct inspection on the basis of applications sent through e-mail but only in case they contain accurate information on the applicant sufficient for his/her identification. In this case, the courts declared that the inspections had been conducted in violation of the above-mentioned principles.

The case was upheld in the courts of 3 instances.

https://kad.arbitr.ru/PdfDocument/5519b274-39d3-453d-8dbe-d9b8c28cb996/A40-161484-2012_20150120_Postanovlenie%20apelljacji.pdf

https://kad.arbitr.ru/PdfDocument/6c60f40c-fde9-47a4-99b3-2b185ddb62f4/A40-161484-2012_20150430_Reshenija%20i%20postanovlenija.pdf

<http://www.vedomosti.ru/economics/articles/2015/05/13/fas-ne-smozhet-provodit>

COURT AND ADMINISTRATIVE PRACTICE

- **Ruling of the Supreme Court of the Russian Federation No. 305-KГ14-1951 to the case No. A40-47885/2013 as of October 24, 2014**
- **Ruling of the Supreme Arbitration Court of the Russian Federation No. 3304/14 to the case No. A40-49279/2013 as of April 2, 2014**

October 24, 2014

Brief description: Unscheduled inspection conducted in the absence of the initiated administrative case on violation of antimonopoly legislation does not contradict to Russian legislation.

The Supreme Court of the Russian Federation indicated that the courts of lower instances had correctly established that unscheduled inspection may be conducted without prior initiation of administrative case on violation of antimonopoly legislation.

FAS Russia conducted an inspection in respect of CJSC ARGUS-SPECTR and its 68 dealers on compliance with antimonopoly legislation. CJSC ARGUS-SPECTR challenged the Order of the Head of FAS Russia "On initiation of the unscheduled inspection".

The courts verified whether the Order contradicts to Russian legislation or not and admitted it lawful. The courts did not take into consideration argument of the claimant that an inspection shall not be conducted without the initiated administrative case on violation of antimonopoly legislation because Point 5 Part 2 Article 39 of the Competition Law sets forth the provision stating that results of the conducted inspection may be a ground for initiation of administrative case on violation of antimonopoly legislation.

https://kad.arbitr.ru/PdfDocument/d70f00e8-c90c-4ebd-9eeb-b1d9984917bc/A40-47885-2013_20141024_Opredelenie.pdf

April 2, 2014

Brief description: Order of FAS Russia on conduction of an inspection cannot be subject of a separate appeal because it does not result in any negative consequences for the inspecting entity. Violation or absence of violation of antimonopoly legislation is established during the consideration of a relevant case upon the results of which the antimonopoly authority issues the relevant decision.

On April 2, 2014, the Supreme Arbitration Court of the Russian Federation refused to transfer a claim of Moscow City Notary Chamber to the Presidium of the Supreme Arbitration Court to reconsider the ruling of the Federal Arbitration Court of the Moscow Region under a supervisory review. The court indicated that the order of FAS Russia does not determine the particular entity that violated antimonopoly legislation nor it results in any negative circumstances for an inspecting body and, therefore, cannot be subject of a separate appeal.

Earlier Moscow City Notary Chamber filed a claim with Moscow Arbitration Court to invalidate No. 266/13 FAS Order of April 16, 2013 on an unscheduled on-site inspection. Later courts of the first and appellate instances satisfied the claim. On February 6, 2014, the Federal Arbitration Court of the Moscow Region ruled to cancel decisions of the courts of first and appellate instances and terminated the proceedings on the case.

https://kad.arbitr.ru/PdfDocument/ba18f1e9-5a66-4691-80ba-2b13f144c465/A40-49279-2013_20140402_Opredelenie.pdf

SERVICES RENDERED BY ALRUD REGARDING CONDUCTION OF INSPECTIONS AND COMPLIANCE

- **Antimonopoly audit of the activity of the company**

Audit can be carried out as in a complex (full antimonopoly audit of the business activity of the company) or in relation to the compliance with the separate standards of the antimonopoly legislation. In particular, for prevention of dawn raids it is possible to estimate compliance of activity of the company to provisions of Article 11 of the Competition Law. Antimonopoly audit allows to reveal the most vulnerable activities of the company and to define the procedures necessary for elimination of the available risks

- **Trainings for key staff employees of the company**

Within these trainings, main requirements of the antimonopoly legislation and also main requirements of the antimonopoly authority are highlighted. These activities increase awareness of the staff on how to act in accordance with the legislation and how to protect rights and legitimate interests

- **Mock-raids recreating circumstances of conduction of real inspections**

Our lawyers in a role of inspection body's officials conduct unexpected inspection and most of employees of a client are not aware that this is not a real inspection. It allows to be psychologically prepared for the real inspection and effectiveness of cooperation of different departments of the company

- **Preparation and development of standard forms of orders and instructions (plans of action) on a case of carrying out of inspection by the antimonopoly authority**

The instruction structures interaction between officials and divisions of the company in a case of investigation conducted by the antimonopoly authority. If employees are acting in accordance with the accurate plan and are aware of the procedure of carrying out of an inspection, probability of commission of mistakes by such employees decreases and awareness on opportunities of protection of their rights and interests in the course of inspections increases.

Other standard forms (for example, order on appointment of the representative responsible for cooperation with the antimonopoly authority during the inspection) allow to save time significantly and avoid technical mistakes during the inspections.

Within the preparatory stage ALRUD, specialists will develop set of documents that might be used in case of inspection.

- **Legal support while conduction of inspections**

Preventive actions can take long time (for about several months). However, if inspection has started, specialists of ALRUD can give the qualified legal support within the process of conduction of an inspection and effectively protect the rights of the inspected entities

OUR EXPERIENCE

- Represented **Vimpelcom** in the investigation of the alleged collusive behavior on iPhone market – the first high profile case under the amended cartel legislation
- Represented **big machine-building company (France)** regarding breach of merger control rules
- Represented **the largest producer of smartphones and tablets under the Android operation system** regarding the case on violation of antimonopoly legislation initiated by FAS Russia against Google on the preset App stores in the Android OS market
- Represented **Unilever Rus` LLC** in the administrative proceeding versus L`Oreal on unfair advertising on Russian TV
- Represented **Maersk Line**, a global leader on the container shipping market, regarding the case of FAS Russia on violation of antimonopoly legislation on the market of international sea container shipping market and advised the Client on strategy and cooperation with the antimonopoly authority
- Represented interests of **world leading producer of construction materials** during FAS Russia dawn raid, proved the omitted information being confidential and achieved suppression of investigation without initiation of proceedings on competition law violation (due to corpus delicti absence)
- Represented **Ontex**, a leading global producer of disposable personal hygiene solutions for babies, women and adults with regard to requests of FAS Russia in relation to compliance with the existing antimonopoly legislation of its Russian subsidiary
- Represented **Pacific Andes International Holdings Limited** in a case on cartel investigation in the fish industry, developed a successful defense strategy. As a result, the Client was not held liable for breach of the Competition Law
- Conducted several internal investigations for **a large foreign producer of electronic and automation systems** in respect of antitrust violations by its employees in its Russian office and conducted risk assessment of potential investigations from the side of FAS Russia, advised the Client on questions related to minimization of the risks revealed and on evasion of the investigation of FAS Russia
- Represented **NYK Line** regarding the investigation of FAS Russia on the market of international sea container shipping. As a result, the authority did not established violation by the Client

OUR TEAM:



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