

Russian Anti-Transparency Master Class FAQ - February 2022

Analyst Questions

Where can I learn more about the specific legislative acts Russia has passed to restrict access to corporate data?

In addition to the Master Class, Sayari has also published a [report](#) on this issue, “Transparency Under Attack: How Russia is altering its legal code to restrict access to corporate data.”

In the report, we cover some of the major decrees that make up recent Russian anti-transparency measures, a topic that has received very little coverage in Western media. More specifically, we include analysis on what type of Russian companies are allowed to omit information from their disclosures and under what conditions. We also provide examples of how these anti-transparency measures are being implemented within the disclosure space, and what types of corporate records this is affecting so far.

Are there new measures being put into place to capture historical data that Russia is omitting from their records?

Currently, the Russian government does not consistently publish historical company data. You can access some historical data for Joint Stock Companies (JSCs) through archived annual and quarterly reports, and other similar disclosures through sources such as E-disclosure.ru. However, the Russian Federal Tax Registry – one of the most useful sources for obtaining company information in Russia – does not provide historical information. It’s a live database, meaning changes are reflected in real time, and you can no longer see the information that was included before the change.

If you’ve been able to capture that data over time, like we have in Graph, you can look backwards and see those historical risk-relevant relationships before they were redacted.

Additionally, historical data can help you better understand how Russian actors have evolved in response to sanctions and other targeting actions in the past. A good example is Sukhoi Aviation, a major Russian civilian and military aircraft manufacturer, that changed its company type from a Public Joint Stock Company (PJSC) to a JSC, a change that will significantly reduce reporting requirements for the company. You can unwind the clock and look at how Russian individuals and companies operated before a designation, and what changed after. This data-driven approach leads to developing better typologies, which in turn support more effective sanctions programs and risk mitigation strategies.

To what extent can official Russian corporate records be trusted?

Russian official corporate records serve both utility and purpose in the daily business activities of Russian companies. These sources are integral for Russian companies to attract investors, obtain contracts and secure financing in domestic and foreign markets. In order to maintain functional business operations and comply with laws that stipulate legal accuracy in corporate reporting, disclosures published by Russian companies are generally accurate. You will find some clerical errors, as you find in records from all jurisdictions.

Are Russian actors using shell companies in the USA?

Yes, Russian actors are using shell companies in the United States, and they are not the only ones. Some U.S. states, like Delaware, have many of the common features of “secrecy jurisdictions” and attract investment from high net worth individuals and others globally who want to keep their identities hidden. We certainly see U.S. incorporated shell companies involved in a variety of illicit schemes, often as part of more complex corporate structures like we discussed earlier - particularly for oligarchs.

In many cases, the U.S. is often not an ideal operating environment for sanctioned Russian actors, though, given their restricted access to the U.S. financial system. For sanctioned oligarchs, there are plenty of non-U.S. jurisdictions, such as the British Virgin Islands (BVI), that offer similar secrecy benefits without as much regulatory scrutiny.

What are some of the most useful sources of official public records in Russia?

Russia actually has a lot of publicly available information that can be leveraged for a wide variety of use cases.

The [Russian Federal Tax Registry \(EGRUL\)](#) is among the most useful for obtaining basic company identifying information, along with ownership and control relationships. What makes the Federal Tax Registry particularly useful, is that it provides up-to-date ownership information for Russian Limited Liability Companies (LLCs).

[E-Disclosures](#) is a useful source that publishes corporate information on Russian Joint-Stock Companies (JSCs). Here, you can find Quarterly Reports, Annual Reports, List of Affiliated Entities reports and other documents for many Russian JSCs.

[Russia Federal Registry of Foreign Company Representatives](#) contains profiles of foreign company branch offices registered in Russia. This source includes information on the foreign company, representative, and accreditation information of foreign branch offices operating in Russia.

All three of these Russian datasets – and more – are included in Sayari Graph.

Sayari Graph Platform Questions

What data does Sayari Graph include?

Sayari Graph currently holds over 1.93 billion records from over 340 sources across the globe, including from traditionally hard-target jurisdictions such as China, Russia, and Iran. These records contain identifying and relational information on more than 1 billion people, companies, and other legal entities.

What language support does Sayari Graph offer?

Sayari Graph offers [multiple translation and transliteration functions](#) to help you explore records in foreign languages. This is everything from on-demand translation of record text to translating your search terms and results. We use a combination of Google Translate, translations and transliterations we generated ourselves based on internal deep learning models, and translations native to the original documents (for example, when Chinese companies disclose their names in English).

Are the ownership details of Chinese companies in Sayari Graph based only on NECIPS filings?

In addition to NECIPS filings, Sayari Graph also [pulls ownership data from other official sources](#), including the Ministry of Commerce Overseas Investment Database and the Ministry of Commerce Foreign Investment Database.

How often do you update the data in Sayari Graph?

Constantly. Each source runs on its own schedule to account for client usage, size, and complexity. All updates take place at least once per year and typically more frequently than that for the average source (e.g. quarterly).

Can I export this data?

Yes, we make all original source documents available for download in the platform or via API. You can also export data as a CSV to integrate with other systems.

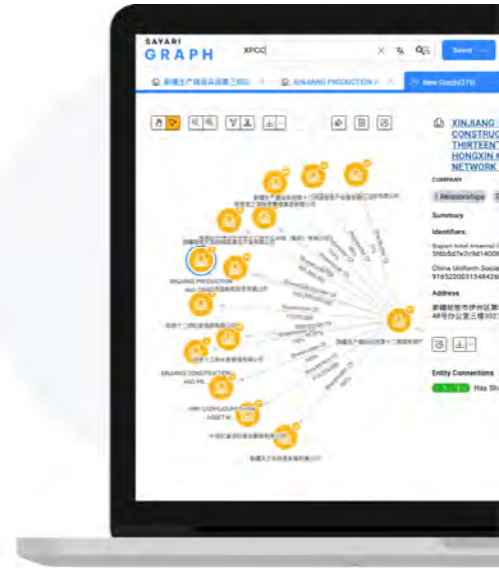
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Financial Services

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& EDD**



**AML, FIU &
Investigations**



**Sanctions
& Embargoes**

Sayari powers investigative and analytical workflows across the financial crime compliance and risk management enterprise. Our mission is to put instant global corporate transparency directly into the hands of practitioners, maximizing visibility and minimizing the need for customer contact.



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Sayari Global Data

Sayari provides instant access to authoritative business information worldwide, covering 479 million companies and 489 million of their key personnel in over 200 jurisdictions, all linked and resolved together into pre-built networks of ownership and control relationships. Sayari is available via cloud-hosted User Interface, API, or Data Subscriptions.



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1.93B

DOCUMENTS

489M

KEY PEOPLE

200+

JURISDICTIONS

902M

RELATIONSHIPS

479M

COMPANIES

3

DEPLOYMENT
OPTIONS

Sayari data is also available via pre-built partner integrations:

NICE · ACTIMIZE

ORACLE



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Sayari Graph Platform

Visualization & Search

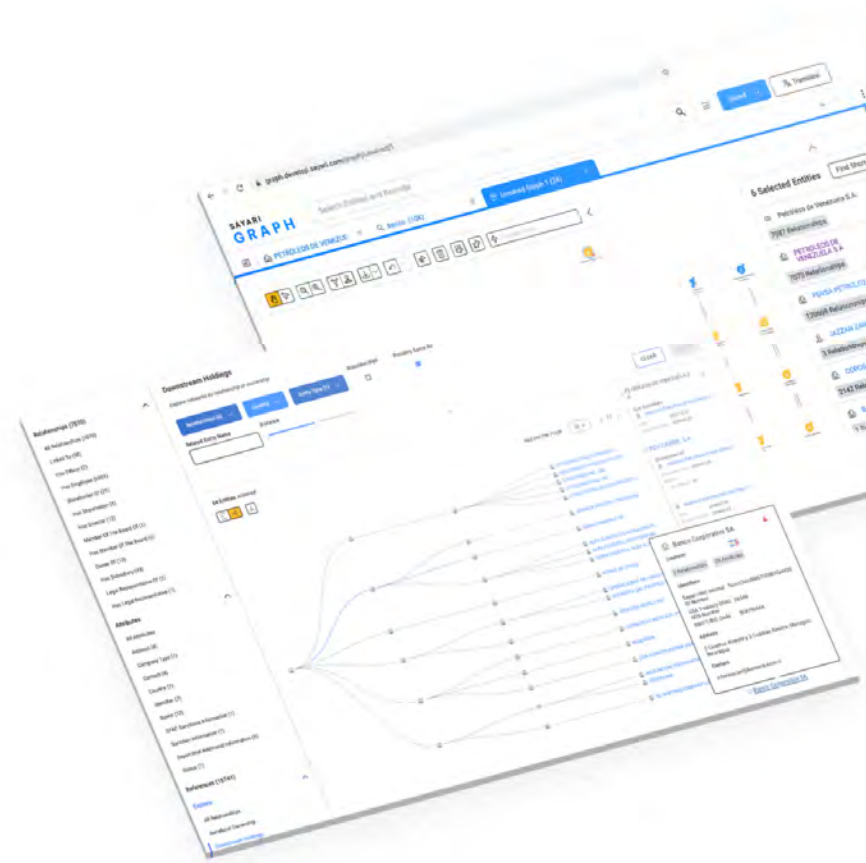
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Financial Crime Graph Analytics

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Developed Markets	●	●	●
High-Risk, Emerging & Offshore Markets	●		
Financial Crime Graph Analytics	●		
In-App Official Documents	●		
Direct Refresh from Official Sources	●		
Rapid Contracting & Licensing	●		
Cloud-Native Scale & APIs	●	●	
Investigator User Interface	●	●	●

