

**Frequently Asked Questions and Comments
regarding the adoption by the State Duma of the Russian Federation
of Draft Law No. 1158407-8 'On Amendments to the Federal Law "On the Legal Status of
Foreign Nationals in the Russian Federation"' (hereinafter - the 'Draft Law')
in its final version**

1. Question: Which highly qualified specialists (HQS) will be affected by the significant increase in the minimum wage (to RUB 717,000 per month)?

Answer: The Draft Law stipulates a minimum threshold for most HQSs (currently established by law at a total of RUB 750,000 per quarter or RUB 250,000 per month).

For certain categories of HQSs, a reduced threshold of RUB 358,500 per month is stipulated. In particular, it applies to:

- researchers and academic staff;
- healthcare professionals working within the territory of an international medical cluster;
- workers in the Republic of Crimea and Sevastopol;
- employees of resident companies in industrial and manufacturing, tourism and leisure, port special economic zones, and technology and innovation special economic zones;
- employees of accredited IT companies;
- employees of participants in the 'Skolkovo' and 'Sirius' projects and in innovative science and technology centres.

2. Question: When will the requirement to increase the minimum wage for HQSs come into force?

Answer: The requirement regarding the minimum wage for HQSs comes into force on 1 March 2027.

3. Question: Is there a transition period for those HQSs who are already working or will be able to work in Russia before 1 March 2027, but will be unable to meet the minimum wage requirement?

Answer: Yes, for foreign nationals-HQSs who have obtained work permits before 1 March 2027 and who will not be able to meet the minimum wage requirement, the obligation to leave Russia is waived for the period during which their documents are being reissued under other procedures (obtaining a patent or applying for a 'standard' work permit).

4. Question: What options should a Russian employer with HQSs on their staff consider?

Answer: A Russian employer must assess the possibility of increasing the minimum wage for HQSs from 1 March 2027.

If this is not feasible, alternative options should be considered now, for example:

- Applying for a work permit for a foreign national via the 'standard' procedure, which requires an advance application for a quota and the foreign national to sit an examination testing their knowledge of the Russian language, history and legal basics;
- The application by a foreign worker for a temporary stay or permanent residence permit;

- The possibility for a foreign worker to obtain a work permit to carry out activities in Russia;
- Assessing the timeframe and preparing the necessary documents to terminate the employment contract with a foreign worker on lawful grounds.

5. Question: Can these changes be used as grounds for terminating an employment contract? What penalties apply for failing to increase the wages of HQSs?

Answer: If an employer takes no action to increase the minimum wage for working HQSs, this may constitute grounds for the revocation of their work permit and, consequently, the termination of their employment contracts, and will result in substantial fines and negative consequences for both the employer and the employee for breaching immigration legislation.

In the event of a breach of the minimum wage requirement for HQSs, the employer and its managers may be held administratively liable in the form of fines:

- RUB 25 – 70 thousand – on officials
- RUB 250 thousand – 1 million or an administrative suspension of operations for a period of 14 to 90 days – on the employer

Foreign nationals face administrative liability for breaching the terms of their stay in Russia: in the form of a fine ranging from RUB 2,000 to RUB 7,000 and possible administrative expulsion from the Russian Federation.

Consequently, this negative scenario is not recommended. If the employer is unable to increase the salary for HQSs by 1 March 2027, one of the alternative options should be implemented.