

**NEW RULES FOR DOCUMENT MANAGEMENT AND STORAGE IN RUSSIA FROM
01.01.2022: FAS 27/2021**

11.06.2021

Dear colleagues and partners,

In this issue we would like to introduce you to the new standard FAS 27/2021 "Documents and document flow in accounting", approved by Order [No. 62n](#) (registered with the Ministry of Justice on 07.06.2021).

The standard introduces new concepts and legislative norms that significantly change the order of document flow and storage of companies' documents (except for organizations in the public sector).

The new standard regulates such things as the procedure for signing documents, the date of documents, the language of documents, making corrections and other aspects mandatory for local accounting services in Russia after the introduction of the standard.

For your convenience, we have prepared a consolidated overview of the main changes introduced by the new FAS (the overview is available in Russian [at the link](#)).

Special attention of foreign companies operating in Russia deserves paragraph 25 of the standard:

Storage of accounting documents

An economic entity must keep accounting documents as well as data contained in such documents and locate the databases of such data in the territory of the Russian Federation.

If the laws or regulations of the country - the place of business outside the Russian Federation - require storage of accounting documents in the territory of this country, such storage should be ensured.

The paragraph **about the need to keep accounting registers in the Russian Federation** raises the most questions from foreign companies.

Many international companies (especially those using SAP, Navision and other international accounting systems) often use servers outside the Russian Federation, which are shared by the group of companies, so the requirement to store registers within the country may entail significant structural changes.

At the moment, however, there is no direct indication in the standard (paragraph 25) as to whether the **primary** accounting registers should be stored in Russia or whether it will be sufficient to ensure the storage of **a copy of the registers** to meet the requirements of the new FAS.

In this connection, collective appeals by international business associations to the Ministry of Finance requesting the necessary clarifications are currently being prepared.

We are closely monitoring the situation and will be happy to offer updates on this topic should further information become available.

We will be glad to answer your questions!

Contacts:

Eugenia Chernova, Projektleitung **swilar** OOO
E-Mail: eugenia.chernova@swilar.ru, T: +7 499 978 37 87 (ext. 310)

SWILAR 000

CEO
Daria Pogodina
ul. Lesnaja 43
127055 Moscow
Tel.: +7 499 978 3787

swilar GmbH

CEO
Tobias Schmid
Erikaweg 32
D-86899 Landsberg / Lech
Tel.: +49 8191 9898377

CEO
Dr. Georg Schneider
Schlehenweg 14
D-53913 Swisttal
Tel.: +49 2226 908258

Natalia Safiulina, Chief accountant swilar OOO

M: natalia.safiulina@swilar.ru, T: + 7 499 978 37 87 (ext. 304)