



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

October 13, 2022

Mikhail Zhukov  
Chief Executive Officer  
HeadHunter Group PLC  
9/10 Godovikova St.  
Moscow, 129085 Russia

**Re: HeadHunter Group PLC**  
**Form 20-F for the Year Ended December 31, 2021**  
**Filed April 27, 2022**  
**File No. 001-38882**

Dear Mikhail Zhukov:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services