



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