

*PwC Azerbaijan's
Academy presents:*

A Series of Trainings on Taxation



Upcoming trainings related to Taxation:

- ❑ Taxation of sub-contractors under the PSA/RSA and HGA regimes
20 February 2020
- ❑ Principles of International Taxation
28 February 2020
- ❑ Taxation system of Azerbaijan
12-13 March 2020
- ❑ Taxation of individuals
27 April 2020



Taxation of sub-contractors under the PSA/RSA and HGA regimes

Duration:	4 hours
Date and time:	February 20, 2020
Language	Azerbaijani
Fee	AZN 300 per participant
Tutors	<ul style="list-style-type: none">• Gunel Sadiyeva• Lala Mustafayeva

Contents

- Taxation of foreign subcontractors
- Taxation under mixed PSA and non-PSA regimes
- Taxation of foreign employees
- VAT and exemption certificate
- Import-export duties and exemption certificate
- Main differences between old PSAs and new PSAs and RSAs

Principles of International Taxation

Duration:	8 hours
Date and time:	February 28, 2020
Language	English
Fee	AZN 500 per participant
Tutors	<ul style="list-style-type: none">• Arif Guliyev• Gunel Sadiyeva

Contents

- Understanding of International taxation;
- Understanding of double taxation;
- Residency rules under DTTs;
- The concept of Permanent Establishment (PE);
- Taxation of business profit;
- Taxation of dividends and interest;
- Taxation of royalties;
- Taxation of Capital gains;
- Taxation of income from personal services and employment income
- The methods of elimination of double taxation.
- Claiming tax reliefs under the Double tax treaties and refund of the overpaid taxes.
Legal basis and administrative procedures.

Taxation system of Azerbaijan

Duration:	16 hours
Date and time:	March 12-13, 2020
Language	Azerbaijani
Fee	AZN 700 per participant
Tutors	<ul style="list-style-type: none">• Arif Guliyev• Gunel Sadiyeva• Sevinj Bainvel

1. Introduction to taxation regimes

2. Profit tax

- Concept of profit tax. Taxable base. Types of income.
- Methods of recognition of income and expenses.
- Exemptions from profit tax.
- Deductible and non-deductible expenses.
- Financing costs. Thin capitalization rules.
- Depreciation and repair expenses.
- Business trip expenses and other expenses incurred in favor of the employees.
- Write off of accounts payable and receivable.
- Capital gains.

- Taxation of long-term projects.
- Financial leasing.
- Peculiarities of taxation of bank sector.
- Permanent establishment and attribution of income and expenses to a permanent establishment.
- Transactions between related parties. Market price and transfer pricing rules.
- Reporting. Loss carried forward.

3. Withholding Tax

- Azerbaijani sourced income. Determining the taxable base.
- Taxation of dividends, royalties and interests.
- Application of Double tax treaties.

4. Value Added Tax

- Concept of VAT.
- Subjects and objects of VAT.
- Exemptions.
- Time and place of taxable transactions.
- Reverse-charged VAT.
- Reporting and filling requirements.

5. Property tax

6. Tax audits

Taxation of individuals and payroll calculation

Duration:

6 hours

Date and time:

April 27, 2020

Language

Azerbaijani

Fee

AZN 400

Tutors

- Rena Hajiyeva
- Sarkhan Karimov

Contents

- Personal income tax: Taxable income. Types of income. Exemptions
- Rules on Business trip
- Vacation calculation
- Payments due to shifts on non-working days and overtime calculation
- General information on shift regimes
- Salary rates for special work conditions (hazardous work condition, Caspian sea rates and etc)
- Evening, night shift payments
- Sick-leave allowance calculation
- Social insurance and unemployment insurance contributions
- Medical Insurance
- Reporting and fillings
- Treatment of hypo tax
- Application of Double Tax Treaties to individuals
- Differences in taxation of the foreign employees under statutory and PSA/RSA and HGA regimes

CVs of our tutors



Arif Guliyev

Managing Director,

Tax and Legal Services Leader

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Professional experience

Out of more than 35 years of work experience, Arif has spent 27 years working in the sphere of taxation, 7 years of which were for Azerbaijan's Tax Administration and 20 years with PwC Azerbaijan. Before joining PwC, from 1992 to 1999, Arif worked at the Main State Tax Inspectorate as a Chief State Tax Inspector where his main responsibilities included interstate negotiations on Double Tax Treaties and preparation of tax instructions.

Education

- Economist, Azerbaijani State
Economical University

In PwC Arif has assisted clients in the areas such as statutory taxation, taxation under special regimes and Double Tax Treaties, tax review services, tax audit support, tax litigations, etc.. Arif has also participated in a number of high-level negotiations of investment projects between foreign investors and the Government of Azerbaijan, helping to achieve the most preferential investment terms for clients. Arif was closely involved in the drafting and adoption process of the 2001 Tax Code and its subsequent amendments as well as other important taxation acts.

He has a significant experience in assisting FS companies with respect to M&A, setting up a tax effective structure of operations, dispute resolutions with the state authorities and tax litigation, claim of tax incentives under statutory legislation and international agreements.

Arif's recent experience:

- Tax training for largest banks in Azerbaijan;
- Tax due diligence and pre-deal and post-deal assistance with respect to merger of two Azerbaijani banks;
- Advising the shareholders of one of the bank with respect to acquisition of mid-size bank in Azerbaijan;
- Advising mid-size Azerbaijani bank on purchase of the immovable assets.

CVs of our tutors



Gunel Sadiyeva

Tax Advisory Leader

Tax and Legal Services

Tel.: +9 94 12 497 25 15

E-mail: gunel.sadiyeva@pwc.com

Professional experience

Gunel boasts more than 9 years experience in tax and legal advisory, including Big4 experience where she has assisted clients with complex tax and commercial matters.

Gunel's main practice areas comprise advising on issues related to international and corporate taxation, merger and acquisitions as well as structuring of potential investments in Azerbaijan. She has a wide legal advisory experience in corporate, employment, and commercial law with companies in financial, construction, manufacturing and PSA sectors.

She leads miscellaneous projects such as tax review, tax audit and due diligence, assists clients during on-site tax audits conducted by the tax authorities.

She also conducted various trainings covering taxation under statutory and PSA taxation regimes and international taxation as well. Gunel is also an adjunct lecturer in the international tax law in the Baku State University.

Gunel's recent experience:

- Tax training for one of the largest banks in Azerbaijan;
- Workshop for Small and medium enterprises with respect to changes in the tax legislation and practical tax aspects;
- Tax review of local mid-size Azerbaijani bank;
- Advising the local company on acquisition of shares into Russian IT solutions and software providing company;
- Tax due-diligence of local manufacturing company.

Education

- Advanced Diploma in International Taxation (ADIT) 2016, ADIT qualified.
- Master degree in „Civil- and Economic law“ 2012, Baku State University
- LL.M.oec. in ‘Private and public economic law’, 2011, Friedrich-Schiller University, Jena, Germany
- Bachelor degree in Law (June 2008), Baku State University

CVs of our tutors



Lala Mustafayeva

Manager

Tax and Legal Services

Tel.: +9 94 12 497 25 15

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Professional experience

Lala Mustafayeva is a finance, accounting and tax professional with over 6 years experience in consulting industry. Prior to joining PwC, Lala worked as a Senior Tax Consultant at Deloitte Azerbaijan.

Lala has extensive experience in establishment of accounting and finance function, transformation of tax function; advising on appropriate changes on the Tax Code; support during statutory tax audits.

Currently Lala is Accounting leader within TRS group and is engaged in tax compliance, tax review, bookkeeping, financial reporting and other projects.

Lala's recent experience:

- Workshop for Small and medium enterprises with respect to changes in the tax legislation and practical tax aspects;
- Establishment of accounting system and processes for FMCG company;
- Transformation of tax function for manufacturing company;
- Support during statutory tax audits of the foreign subcontractors under PSA;
- Tax review of manufacturing company.

Education

- Azerbaijan State Economic University – Bachelor in Finance
- Student of the International Association of Certified Chartered Accountants (ACCA, UK)

CVs of our tutors



Rena Hajiyeveva

Manager

Tax Management and Accounting Services

Tel.: +9 94 12 497 25 15

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Professional experience

Rena has significant experience in assisting companies in such areas as statutory corporate and expatriate taxation, taxation under special regimes, accounting, tax compliance and payroll.

Rena is specialising in tax accounting, tax compliance and payroll services and now is leading separate payroll cluster at PwC.

She provides consultation on human resource and payroll aspects including details of various types of payroll calculation methods and provide payroll instructions in accordance with client industry specifics.

Rena is leading International Assignment services at PwC and deals with everything that is related to expatriate assignment in Azerbaijan and local employees outside of Azerbaijan – provision of the tax consultations to individuals explaining tax residence determination and tax liabilities in/out of Azerbaijan. Assist individuals with calculation of their tax liabilities and preparation of employees' income tax reports.

Selected engagements

Rena's client portfolio includes many major multinational companies in a variety of industries, such as energy and utilities, financial services, consumer and industrial products, construction, telecommunications, technology.

Education

- Bachelor's degree in Economics, Khazar University
- Currently pursuing her ACCA degree

CVs of our tutors



Sevinj Bainvel

Senior Tax Associate

Tax Advisory

Tel.: +9 94 12 497 25 15

E-mail: sevinj.bakshiyeva@pwc.com

Professional experience

Sevinj is senior tax associate at PwC since November, 2017. She has supervised major PwC clients specializing in tax accounting, tax compliance payroll services, corporate tax advisory, tax audit support, etc.

Sevinj's recent experience:

- Review of tax liabilities of mining, agriculture, drilling, FMCG company
- Assistance in the refund of overpaid taxes
- Acquiring of exemption certificate or application of lower rate of tax in connection with DTT for non-resident company
- Advising with respect to structuring of investment company in Azerbaijan
- Advising with respect to tax implication of consulting services provided by non-resident company

Competence by area of Law

- Statutory taxation & Double Tax Treaties;
- Taxation under special regimes;
- Tax audit support;

Education

- Bachelors World Economy, UNEC , MsC Development Economics, University of Clermont Auvergne.
- Currently pursuing ACCA degree