



The deadline for submission of the Notification on participation in a multinational enterprise group is approaching (annual transfer pricing reporting)

Contacts

Timur Zhursunov

Partner,
Tax, Legal and People Services
timur.zhursunov@pwc.com

Elena Kaeva

Partner,
Tax, Legal and People Services
elenkaeva@pwc.com

Nursultan Nurbayev

Director,
Tax, Legal and People Services
nursultan.nurbayev@pwc.com

Inkar Yessimova

Manager,
Tax, Legal and People Services
inkar.yessimova@pwc.com

Elvira Haliulina

Manager,
Tax, Legal and People Services
elvira.haliulina@pwc.com

If you are interested in additional information, please contact us.

Briefly

The deadline for filing Notification on participation in a multinational enterprise group ("CbCR Notification") for 2022 runs out on 1 September 2023.

The CbCR Notification should be submitted electronically. Submission in paper format is acceptable but only if electronic filing is not possible.

In details

We would like to remind you about the approaching deadlines for filing CbCR Notification which is mandatory for submission to the Kazakh tax authorities by participants of multinational enterprise groups ("MNE Groups").

Submission deadlines

- CbCR Notification is submitted on an **annual basis**
- The submission deadline for 2022 is **until 1 September 2023**
- The deadline does not apply to the submission of an **amended** Notification

Who is required to provide the reporting data

Any entity within a MNE Group is obliged to file a CbCR Notification if it is subject to any type of the three-tiered TP documentation requirements: Local file, Master file and Country-by-Country Report (CbCR). Taking into account the planned amendments to the TP Law, It is important to note that in the future all participants of the MNE Groups will be obliged to submit CbCR Notification.

Filling of CbCR Notification

The CbCR Notification should be submitted electronically and/or on paper.

If the Notification is submitted on paper, it is recommended to **provide the justification for failure with filing the Notification electronically** to avoid the risk of its non-acceptance.

Responsibility for non-submission/incomplete submission

Please note that in case of non-submission or incomplete submission of the CbCR Notification by a participant of MNE Group, the legislation imposes an administrative fine of up to 500 MCI (~ USD 3,900).

More detailed information on CbCR Notification is available in our short video by following the link: https://www.youtube.com/playlist?list=PLTavyP_B-yuKUs55a8s9W-52emSJNJh7F

How can we help

We are ready to provide all the necessary consulting support to your company on TP issues, to help with preparation of the CbCR Notification and support with its further submission to the tax authorities.

