



Reminder regarding the deadlines for submitting mandatory transfer pricing reports

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

We would like to remind you about the upcoming deadlines for filing the following types of annual Transfer Pricing ("TP") reports, which are mandatory for submission to the Kazakh tax authorities by participants of multinational enterprise groups ("MNE Group")

- Notification for being a member of a MNE Group ("CbCR Notification");
- TP Local File.

Submission deadlines

- CbCR Notification is submitted on an annual basis.
The submission deadline for FY2020 is until September 1, 2021.
- TP Local File is submitted to the authorized bodies on an annual basis no later than 12 months following the reporting financial year.
The submission deadline for FY2020 is until December 31, 2021.

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)*.

The obligation to submit TP Local File is assigned on members of MNE Group, carrying out transactions in the reporting financial year, subject to TP control, as well as under the condition, that the amount of revenue of a MNE Group participant for the financial year, preceding the reporting financial year (i.e. 2019) is **at least 5 million of Monthly Calculation Index (MCI) (~13 billion KZT)**.

Responsibility for non-submission/incomplete submission

Please note that in case of non-submission or incomplete submission of the above-mentioned reports by a participant of MNE Group, the legislation imposes an administrative fine of up to 500 MCI (~3,000 USD). The amount of the fine is not material, however, we note that this fact may attract the attention of tax authorities, who may initiate desk audit or tax audit regarding TP issues.

How can we help

We are ready to provide all the necessary consulting support to your company on this issue, to help with the analysis of the applicability of these requirements to your company, to provide support for the preparation of the above-mentioned reports.

** At the same time, we remind you that the other three-tiered documentations such as CbCR and Master file for the reporting financial year are submitted by the participants of MNE Groups to the tax authorities no later than 12 months from the date of receipt of the request.*

More detailed information is available at the link:

<https://www.pwc.com/kz/en/services/transfer-pricing/new-requirements-rus.pdf>

