



## Astana International Financial Centre

### In brief

In this Tax and Legal Alert, we present an overview of the **Astana International Financial Centre (AIFC)**—a leading financial hub located in Astana, Kazakhstan, serving Central Asia and Eastern Europe. This alert is particularly timely given the growing interest among Mongolian companies and individuals in expanding their business across Eurasian markets.

In this context, the AIFC presents an attractive destination for establishing your legal presence, offering a compelling entry point into the Eurasian market through its independent jurisdiction based on English common law principles, a highly favorable legal and tax environment, and a well-developed financial infrastructure. Please see below for a summary of AIFC's key features and the main tax incentives available.




### Key regulatory features of AIFC

- ✓ Independent legal framework based on English law
- ✓ International arbitration centre for dispute resolution
- ✓ A tax-friendly environment for resident companies
- ✓ Special visa arrangements and simplified entry procedures for foreign employees
- ✓ No minimum investment requirements



### Main AIFC tax incentives until 1 January 2066:

- CIT and VAT exemption for licensed activities (brokerage, Islamic banking finance, insurance, reinsurance, investment management, underwriting, etc.);
- CIT exemption for legal, audit, accounting and consulting services provided to AIFC registrants engaged in the licensed activities;
- PIT, CIT, WHT exemption of capital gains and dividends from shares / stakes in the capital of AIFC registrants, including Holding companies;
- PIT, CIT, WHT exemption of capital gains, interest and dividends from securities listed on the official list of the Astana International Exchange ("AIX") upon meeting certain conditions;
- PIT exemption of income from sources outside of Kazakhstan, if individuals are AIFC investment residents and Kazakhstan tax residents
- PIT exemption of income received by foreign employees of AIFC registrants engaged in licensed activities and activities listed in above.



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### How PwC Kazakhstan and PwC Mongolia can help you:

- ❖ Tax and legal consulting on structuring / restructuring of your businesses to obtain the most optimal structure;
- ❖ M&A support and deals structuring;
- ❖ Support with registration of legal entities in the AIFC, including the guidance on the key steps, documents and timeline for incorporation;
- ❖ Assistance with obtaining licenses required for regulated activities within the AIFC framework;
- ❖ Support with redomiciliation to AIFC from legal and tax perspectives;
- ❖ Consultations on how the AIFC tax regime can be used in the most beneficial way;
- ❖ Support with tax compliance to ensure adherence to AIFC standards;
- ❖ Ongoing support with communications with AIFC and other state bodies;
- ❖ Tax consulting on the application and enforcement of applicable Mongolian tax rules, including Effective Place of Management (EPM) and Controlled Foreign Company (CFC) rules, as well as analysis of Mongolian tax implications related to profit repatriation transactions from the AIFC to Mongolia; and
- ❖ Mongolian legal risk assessment and regulatory compliance reviews for businesses operating under AIFC or cross-border frameworks.

PwC Kazakhstan and PwC Mongolia are planning to organize a free joint webinar, conducted in English and Mongolian, to present an overview of the AIFC in September 2025. To register your interest in attending, please contact us at the contact below:

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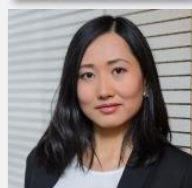
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