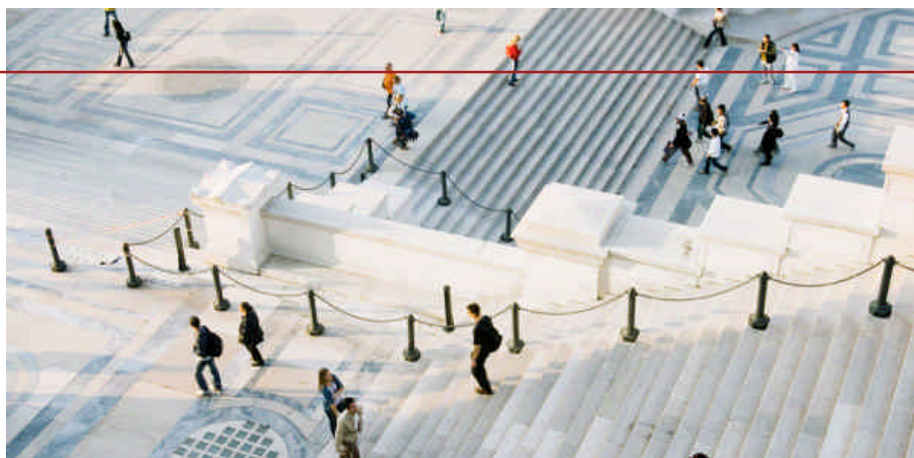


Flash Report

Ukraine • Issue#37/2014 • 03 July 2014

TP legislation: clarification issued



Contacts:

Ron Barden

Partner & TLS Leader
ron.j.barden@ua.pwc.com

Slava Vlasov

Partner, Tax and Legal Services
slava.vlasov@ua.pwc.com

Svetlana Bilyk

Director
Tax and Legal Services
svetlana.bilyk@ua.pwc.com

Olga Trifonova

Manager
Tax and Legal Services
olga.trifonova@ua.pwc.com

PwC Ukraine

75 Zhylyanska Street, Kyiv, 01032
Tel: +380 44 490 6777
Fax: +380 44 490 6738

www.pwc.com/ua

This flash report is produced by PricewaterhouseCoopers' tax and legal services department. The material contained in this alert is provided for general information purposes only and does not contain a comprehensive analysis of each item described. Before taking (or not taking) any action, readers should seek professional advice specific to their situation. No liability is accepted for acts or omissions taken in reliance upon the contents of this alert.

©2014 Limited liability company «PricewaterhouseCoopers». All rights reserved. PwC refers to the Ukrainian member firm, and may sometimes refer to the PwC network. Each member firm is a separate legal entity. Please see www.pwc.com/structure for further details.

The Ministry of Revenues and Duties has expanded its interpretation of transfer pricing legislation

On 1 July 2014, the Ministry of Revenues and Duties of Ukraine issued* an order that clarifies/interprets various articles of the transfer pricing (TP) legislation.

There are now 41 responses to commonly raised questions**. These include the methodology for calculating the 50 mln threshold; submission dates of reports; and an expanded definition of the taxpayers subject to TP regulations.

The link to this general tax consultation is included below***.

**the order of the Ministry of Revenues and Duties of Ukraine #368 dated 1 July 2014*

***the previous edition of the general tax consultation related to the implementation of transfer pricing legislation was issued on 22 November 2013 by the order of the Ministry of Revenues and Duties of Ukraine #699*

****http://minrd.gov.ua/data/normativ/000/001/63226/Transfert_2014_z_1_41_dopovnenn_do_699_nova_redakts_ya_3.doc*