



RUSSIA

CHANGES OF TRANSFER PRICING REPORTING DEADLINES

The transfer pricing legislation in Russia is quite new and has been significantly changed since 2012. For instance, the new law first introduced the responsibility of taxpayers to file specific transfer pricing documentation (before 2012 there was no requirement for taxpayers to support the applied prices and prepare any kind of transfer pricing reporting).

Generally the procedure for transfer pricing reporting is as follows:

- Taxpayers should identify controlled transactions and provide general information about them to the tax authorities. The general deadline for such notification is 20 May of the year following the reporting;
- The tax authorities may then initiate a transfer pricing audit based on the information provided to them in the notification (or information they received from local authorities) and request the formal transfer pricing reporting proving the applied prices. Such a request can be made not earlier than 1 June of the year following the reporting year, and the taxpayer then has 30 days to submit the requested documents.

As the law is novel both for taxpayers and the tax authorities, there is a transition period and some of the provisions are implemented gradually. In addition to certain transition period reliefs announced earlier, the Federal Law of 5 April 2013 No. 39-FZ introduced a number of changes to the Tax Code and, inter alia, postponed the transfer pricing filing deadlines for 2012, which are now as follows:

- 20 November 2013 as the deadline for notifying the tax authorities about controlled transactions performed during 2012;
- 1 December 2013 as the first date for requesting official transfer pricing reporting from taxpayers by tax authorities.

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