

# Kazakhstan

## Overview of CbC reporting requirements

First reporting fiscal year: Commencing on or after 1 January 2016

Consolidated group revenue threshold: EUR 750 million

Filing deadline: 12 months following the end of the reporting fiscal year

Local filing required: Yes

Surrogate parent entity filing permitted: Yes

First review of the domestic legal framework: 2018/2019

## Summary of recommendations

Area of implementation	Recommendations for improvement
Domestic legal and administrative framework	<p>It is recommended that Kazakhstan clarify the exact scope, conditions, and legal basis under the minimum standard and/ or the exchange of information framework for the exemption in case of state secrets.</p> <p>It is recommended that Kazakhstan implement a provision whereby a single Constituent Entity of the same MNE Group may be designated to file the CbC report which would satisfy the local filing requirement of all the Constituent Entities in Kazakhstan.</p> <p>It is recommended that Kazakhstan clarify that the annual consolidated group revenue threshold calculation rule applies in line with the OECD guidance on currency fluctuations in respect of an MNE Group whose Ultimate Parent Entity is located in a jurisdiction other than Kazakhstan.</p>
Exchange of information framework	It is recommended that Kazakhstan take steps to implement processes or written procedures to ensure that the exchange of information is conducted in a manner consistent with the terms of reference relating to the exchange of information framework ahead of its first exchanges of information.
Appropriate use	None.

## The domestic legal and administrative framework

It is recommended that Kazakhstan clarify the exact scope, conditions, and legal basis under the minimum standard and/ or the exchange of information framework for the exemption in case of state secrets. This recommendation remains in place since the 2018/2019 peer review.

It is recommended that Kazakhstan implement a provision whereby a single Constituent Entity of the same MNE Group may be designated to file the CbC report which would satisfy the local filing requirement of all the Constituent Entities in Kazakhstan. This recommendation remains in place since the 2018/2019 peer review.<sup>1 2</sup>

It is recommended that Kazakhstan clarify that the annual consolidated group revenue threshold calculation rule applies in line with the OECD guidance on currency fluctuations in respect of an MNE Group whose Ultimate Parent Entity is located in a jurisdiction other than Kazakhstan.

## The exchange of information framework

It is recommended that Kazakhstan take steps to implement processes or written procedures to ensure that the exchange of information is conducted in a manner consistent with the terms of reference relating to the exchange of information framework ahead of its first exchanges of information. This recommendation remains in place since the 2018/2019 peer review.

## Appropriate use of CbC reports

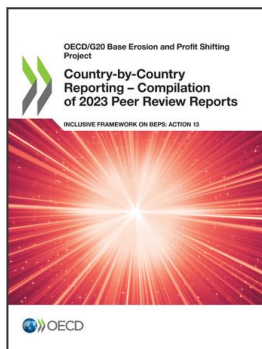
Kazakhstan's 2021/2022 peer review included a recommendation that Kazakhstan takes steps to ensure that the appropriate use condition is met ahead of the first exchanges of information. Kazakhstan has provided details of the controls it has in place to ensure the appropriate use of CbC reports, which comply with published Guidance on the appropriate Use of Information Contained in CbC Reports and this recommendation is removed.

Kazakhstan meets all terms of reference with respect to the appropriate use condition.

## Notes

<sup>1</sup> Kazakhstan's 2018/2019 peer review included a general monitoring point relating to the processes that would allow Kazakhstan to take appropriate measures in case Kazakhstan is notified by another jurisdiction that it has reason to believe with respect to a Reporting Entity that an error may have led to incorrect or incomplete information reporting or that there is non-compliance of a Reporting Entity with respect to its obligation to file a CbC report. This monitoring point remains in place.

<sup>2</sup> Kazakhstan's 2018/2019 peer review included a monitoring point as it is unclear whether Kazakhstan's legislation provides for the deactivation of local filing in case of surrogate filing. Kazakhstan state that this is the case. This monitoring point remains in place.



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