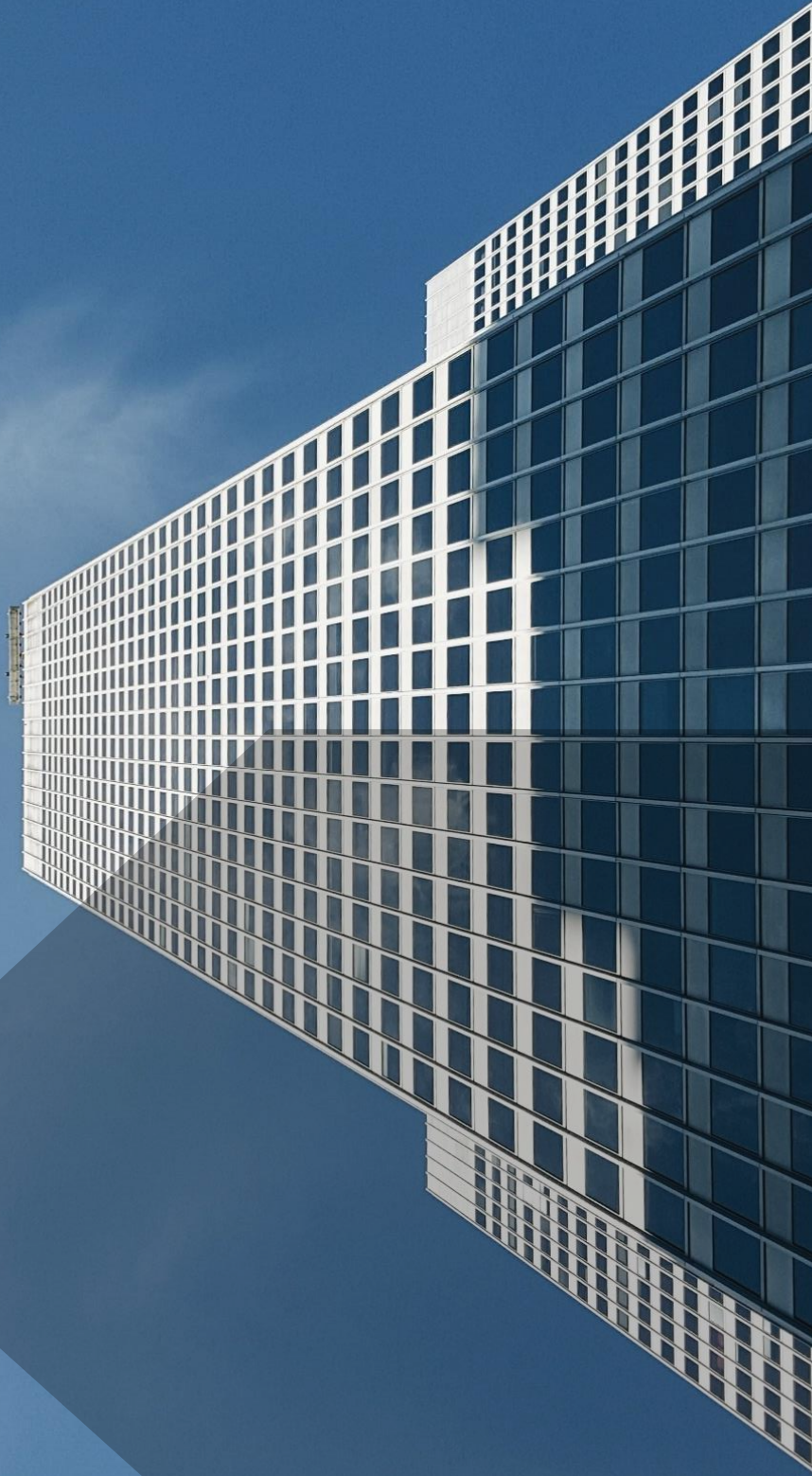




MOORE

MOORE –
TAX SERVICES







TAX SERVICES

Moore Global team's mission is to help your business thrive in a changing world!

In our fast pace world, the requirements to specialists of financial and tax departments of companies are increasing dramatically. Those specialists not only have to perform their daily work timely and efficiently. They must stay on top of constantly changing local and international legislation and provide support to their businesses to by proactively identifying potential risks and spotting available benefits of newly planned transactions.

Specialists of Moore Kazakhstan worked in Kazakhstan tax authorities, in Big4 companies in Kazakhstan and in Europe, as well as headed financial and tax departments of international companies. They experienced themselves the difficulties faced by companies, and are well aware of the opportunities that are often missed.

With a wide network of offices, Moore Global will provide you with access to the global best practices, as well as our support in meeting the requirements of both Kazakhstan and international tax legislation.

Our team is ready to help you effectively complete your tasks, and develop individual and practical solutions, using the experience of our specialists.

Moore Kazakhstan offers the following tax advisory and compliance services:

- Taxation of legal entities
- Transfer pricing
- Investment tax preferences
- International taxation
- Taxation of individuals
- Private client services
- Outsourcing services



MOORE KAZAKHSTAN

Moore Kazakhstan is a member firm of one of the world's leading accounting and consulting associations, with headquarters located in London.

Founded in 1907, the network Moore Global Network Limited is one of the top ten international accounting and consulting groups, spanning more than 110 countries throughout the world and employing over 37,000 people, with annual earnings of over US\$4.5 billion. The multidivisional structure of our association provides each member with the opportunity to share best practice and knowledge with colleagues in order to meet clients' commitments wherever they do business.

The depth and breadth of offered services are equivalent to those offered by Big 4 firms. These services are enhanced by a more hands-on, customized approach to serving client needs. At the same time, we are committed to the basic principle of our work: to offer you international level services at optimal prices.

Our clients have access to a range of core and specialist services including audit, tax consulting, transfer pricing, accounting process support, transaction support, financial and tax due diligence, business valuation, legal services.

Memberships and Recognitions

Moore Kazakhstan is an auditor company which is

- a member of the Board of Auditors of Kazakhstan
- a recognized at Kazakhstan Stock Exchange (KASE) as a 1st category provider
- a consultant approved by the European Bank of reconstruction and development (EBRD) of Kazakhstan
- a member of European Business Association (EUROBAK)

Our team is a team of highly qualified accountants, tax specialists, lawyers and auditors, each of them are recognized experts in their specialization area with unique practical experience.



TAXATION OF LEGAL ENTITIES

Constantly changing tax legislation and the associated ambiguity, along with high penalties, bears a risk of significant costs even because of a minor accounting error.

Best practices show that it is easier to prevent tax related errors, because resolving them may be expensive. Therefore, many successful companies attract tax specialists to deal with their tax matters, and free up their time and resources to focus on their business.

How can we help:

Assistance offered by Moore Kazakhstan is aimed at helping our clients improve business processes to proactively minimizing potential tax risks and improving overall efficiency of companies.

The services in this area include:

- Consultations on setting up a business
- Consultations on ongoing corporate income and indirect tax issues
- Consultations on restructuring existing operations or planning new transactions
- Tax review and risk identification
- Diagnostics of tax accounting processes and advising on tax accounting process optimization
- Development or updating of tax accounting policies and tax registers

Why Moore Kazakhstan:

- Customised approach: deep practical knowledge allows our specialists to correctly diagnose risks and offer optimal solutions adapted to the specifics of the company
- Comprehensive approach: our team includes lawyers and tax consultants, and provides a comprehensive approach to solving problems, ensuring business efficiency
- The most updated information: Moore Global specialists take active part in tax working groups of business associations in Kazakhstan and Europe, which allows us to stay on top of the coming changes. Proactively informing our clients about coming changes helps prepare their business to meet new requirements at the minimal cost.



TRANSFER PRICING

The transfer pricing legislation worldwide is aimed at regulating transactions between related parties. Such transactions could be carried on at prices different from the market prices, and the tax authorities consider them as bearing a risk of tax avoidance by redistributing profits between companies within an international group.

The transfer pricing legislation in Kazakhstan applies to all international transactions, even those carried on between independent parties.

How can we help:

Moore Kazakhstan provides the following transfer pricing services:

- Diagnostics of international transactions to identify transfer pricing risks
- Preparation of a full package of transfer pricing documentation, including benchmarking analysis of controlled transaction and market prices
- Preparation of three-level reporting, including local file, master file and country-by-country report and statement of international group member
- Developing transfer pricing policies
- Assistance in the preparation for tax audits and support during the process of appealing tax audit results
- Interaction with the tax authorities

Why Moore Kazakhstan:

- Most updated information: our specialists participate in the OECD's transfer pricing consultation initiatives. This gives our clients access to the most up-to-date information and enables them to make timely decisions.
- Our specialists have extensive international experience in providing transfer pricing services, and can offer you access to global best practices, and which will allow you to immediately apply in practice the results of our services.



INVESTMENT TAX PREFERENCES

Kazakhstan is well known for its openness to innovation and economic development. The Government provides support to investors who create new production facilities or invest in expanding and updating existing production facilities. As part of this support, the legislation provides for the provision of investment preferences, including significant tax benefits, through the conclusion of an investment contract.

Investing in production is a combination of activities carried out by technical experts and engineers who are not lawyers or specialists in taxation. Preparation of application package of documents for concluding investment agreements is not usually an area of their expertise.

For successful application for investment preferences, it is crucial not only to determine applicable benefits, but also to prepare application package in accordance with numerous legal requirements. Even minor omissions in completing application forms may lead to the rejection of the application for investment tax preferences.

How can we help:

Moore Kazakhstan specialists can provide the following support:

- Analysis of existing documents and advice on applicable benefits
- Support in preparing an application and a package of supporting documents
- Submission of an application and interaction with authorized bodies during the application review process
- Subsequent support in meeting tax compliance requirements within the frame of carrying on activities under investment agreements

Why Moore Kazakhstan:

- Our specialists have extensive practical experience in preparing documents in accordance with the law and interacting with authorized bodies during the application process, and in the further application of tax benefits. Many of our clients have successfully concluded investment agreements and enjoy tax preferences.
- Comprehensive approach: project teams include lawyers and tax advisors, which provides a rounded approach to performing tasks and allows addressing not only tax but other legislative matters as well.
- Most updated information: our specialists actively participate in tax legislation development and investment climate improvement working groups, which allows providing our clients with most up-to-date information and use available benefits.



INTERNATIONAL TAXATION

Expanding your business beyond the borders of one country means that the laws of several countries interact, which introduces additional requirements to the tax rules and complicates decision-making.

Issues related to the group's management structure, financing methods, profit repatriation, and many others can have a decisive impact on the level of tax burden, the efficiency of business processes, and the reputation of an international company.

At the same time, tax departments of international companies are usually very busy with daily work and limited in resources and available information.

Moore Kazakhstan specialists, with all excellent qualifications and rich international experience, are ready to provide the necessary support to our clients, regardless of the place of their business.

How can we help:

Moore Kazakhstan provides the following services in this area:

- Structuring and tax planning of cross-border transactions
- Analysis of the group's existing structure and comments on tax risks
- Consultation on the development of an effective structure of international groups, including issues of management, financing and profit repatriation
- Advice on setting up a business abroad or acquiring foreign assets
- Advice to non-residents on investing in Kazakhstan
- Issues of application of international agreements and offset of foreign tax
- Assistance in preparing tax reports and paying taxes

Why Moore Kazakhstan:

- Effective and efficient team of specialists has long-term extensive experience of assisting companies from various industries in their international activities.
- The project team is tailored to the specific needs of each client and includes lawyers, tax consultants and accountants to ensure a comprehensive approach to developing individual solutions that take into account all possible aspects of a particular company and industry specifics.



PRIVATE CLIENT SERVICES

Kazakhstan, like many countries in the world, is strengthening control over compliance with tax legislation by individuals, including the exchange of tax and financial information between tax authorities. The current tax legislation requires individuals to declare real estate and Bank accounts outside of Kazakhstan, disclose the structure of business ownership, and much more.

The risks associated with these requirements may make it necessary to review business decisions and investment strategies, taking into account the tax and legal risks associated with these processes. These processes can also make it more difficult to plan to move to other countries and obtain foreign residency or citizenship.

Moore Kazakhstan team works closely with colleagues from other countries to advise individuals with complex business and asset ownership structures in order to provide comprehensive support and effectively solve the problems faced by our clients.

How can we help:

To help meet legal requirements, Moore Kazakhstan is ready to offer the following support:

- Consultations on compliance with the requirements of Kazakhstan and international legislation in planning and management of foreign property and international investments
- Support in preparing and submitting tax reports and applying the provisions of international conventions
- Consultations on the application of legislation on taxation of controlled foreign companies (CFC)
- Consultations on changing tax residency and immigration matters

Why Moore Kazakhstan:

- Long-term practical experience with international tax compliance requirements, close interaction between offices in different countries, and international standards of ethics and confidentiality distinguish our team specializing to provide services to private clients.
- Our procedures for providing such services are focused on enhanced data protection, so that our clients can be sure in the safety of their information.
- Experienced specialists specially trained in this field will provide an advice tailored to the needs of a particular person, taking into account the specifics of the situation, regardless of jurisdiction.



OUTSOURCE SERVICES

Contradicting requirements of various branches of the legislation combined with high penalties, as well as the difficulties for companies to assess the professionalism of hired specialists and the correctness of their work are associated with the risk of penalties, when even minor errors can be very expensive.

The solution to those issues is outsourcing of processes such as accounting, tax compliance, personnel administration and payroll calculations. Experienced specialists will ensure the effectiveness of those processes and their compliance with legislation, and the company's management will be able to focus on the needs of the business.

How can we help:

Our outsource services include:

- Accounting / bookkeeping
- HR Administration;
- Payroll accounting and other payments to individuals
- Preparation of tax reports
- Accounting, labor law and tax consultations

Why Moore Kazakhstan:

- The team of experienced specialists will carefully study your business and accounting processes at the beginning and will highlight to you the opportunities for optimizing accounting processes, as effective processes and procedures are not only the basis of tax compliance, but also an important risk management tool. As a result, the company will be able to comply with complicated requirements of the legislation without unnecessary tax expenses.
- We constantly monitor the latest trends in legislation and develop new methods in order to be able to quickly effectively help you respond the needs of your business
- At Moore Kazakhstan we adopt the quality controls system, developed in accordance with the world best practices and Moore Global standards. This, combined with deep knowledge, rich practical experience of our specialists and with advanced modern technologies will allow your company stay compliant with the complex legislative requirements, without incurring unnecessary tax costs.



MOORE GLOBAL NETWORK

At Moore, our purpose is to help people thrive – our clients, our people and the communities they live and work in. We're a global accounting and advisory family of over 37,000 people across more than 260 independent firms and more than 110 countries, connecting and collaborating to take care of your needs – local, national and international.

When you work with Moore firms, you'll work with people who care deeply about your success and who have the drive and dedication to deliver results for you and your business. You'll have greater access to senior expertise than with many firms. We'll be here for you whenever you need us – to help you see through the maze of information, to guide you in your decisions and to make sure you take advantage of every opportunity. To help you thrive in a changing world.

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