



newsletter

TAX | RUSSIA |

NOVEMBER - DECEMBER 2013

MONTHLY TAX UPDATE

- **Resolution of the Government of the Russian Federation No. 952 dated 24 October 2013**

The Government of the RF adopted certain amendments to the Resolution of the Government of the RF No. 1137 dated 26 December 2011, in particular, amendments in respect of the period of registration of the adjusted VAT invoice in the sales book. The Resolution came into force on the 6 November 2013.

- **Resolution of the Government of the Russian Federation No. 1101 dated 30 November 2013**

Beginning 1 January 2014, the maximum base for accrual of obligatory insurance contributions to non-budgetary state funds has been increased from 568,000 roubles to 624,000 roubles per year in respect of each employee.

- **Order of the Ministry of Finance of the Russian Federation and Federal Tax Service of the Russian Federation No. MMB-7-6/527@ dated 27 November 2013**

The amendments to the unified simplified tax declaration have been introduced. The adjusted tax declaration applies from 1 January 2014.

- **Letter of the Federal Tax Service of the Russian Federation No. OA-4-13/19652@ dated 1 November 2013**

The Federal Tax Service provided detailed clarifications on the completion of a notification on controlled transactions, in particular, those transactions related to loan agreements and promissory notes.

- **Letter of the Ministry of Finance of the Russian Federation No. 03-01-18/40527 dated 1 October 2013**

The Ministry of Finance outlined that new transfer pricing rules do not apply to loan and guarantee agreements, in spite of the fact that the income and expenses under these agreements are declared for profit tax purposes after 1 January 2012 if (i) the agreements are concluded before 1 January 2012 and (ii) the agreements have not been amended after 1 January 2012.

- **Letter of the Ministry of Finance of the Russian Federation No. 03-07-15/41875 dated 8 October 2013**

The Ministry of Finance clarified that as all taxpayers and tax agents should submit VAT declarations in electronic form starting from 1 January 2014 (see our *Flash report dated September 2013*), the adjusted VAT declarations for the tax periods prior to the 1st quarter of the 2014 tax year could be submitted in accordance with the procedure applied before 1 January 2014.

- **Resolution of the Presidium of the High Arbitration Court of the Russian Federation No.3715/13 dated 17 September 2013**

The Presidium of the High Arbitration Court of the RF stated that for the application of the thin capitalization rules tax deductible interest should be determined on a quarterly basis without recalculation of the interest accrued in prior reporting periods of the respective tax period, i.e. not on annual basis.

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