



# **International tax cooperation perspectives in the Republic of Armenia**

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## **Key directions of International Tax Cooperation**

- 1. OECD Global Forum on Transparency and Exchange of Information on Tax purposes,**
- 2. OECD Base erosion and profit shifting project,**
- 3. other peculiarities.**



## **Global forum:**

Republic of Armenia is a Global Forum member since 2015 and now is in induction process.

The Road Map was established on March 2016 and on June 2017 there was the first on-site visit by Global Forum Secretariat for preliminary assesment of relavant legislation.

All necessary works connected to the Global forum membership are done by the working group.



## Global Forum: next steps

- By 2020 to have in place all legislative and administrative solutions for exchange of information on request in line with international standards,
- From 2020 to start the process for the implementation of Standard on Automatic exchange of information.



## **Base Erosion and profit shifting (BEPS) project**

- ✓ Republic of Armenia is not a BEPS Associate but implementation of BEPS Actions are highly prioritised by the Government of the Republic of Armenia.
- ✓ There is a ongoing process with donor and international organisations to attract financial resources to become BEPS Associate.
- ✓ Some BEPS Actions are included in the RA Government Action Plan 2017-2022.



## **BEPS: Actions to be implemented**

**Action 1:** E-commerce

**Action 8-10 and Action 13**

Transfer pricing rules and country by country reporting

**Action 15**

Multilateral Convention to implement tax treaty related measures to prevent BEPS



## **BEPS Action 15**

The Republic of Armenia has signed the Multilateral Convention on June, 2017 which is now passing all necessary internal procedures to become inforce.

Armenia`s approach was very moderate and MLI covers all already concluded agreements.

The only reservation was connected to the Arbitration provisions.



## **Other peculiarities of International Tax Cooperation**

- ✓ OECD Model Tax Convention Commentaries,
- ✓ EU listing of Non-cooperative jurisdictions.





**THANK YOU FOR YOUR ATTENTION**