



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 preliminiary assessment 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.





- ✓ 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 resourses 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

Multilaterial Comvention to implement tax treaty related measures to prevent BEPS





BEPS Action 15

The Republic of Armenia has signed the Multilaterial 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.



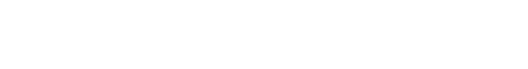




Other peculiarities of International Tax Cooperation

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





THANK YOU FOR YOUR ATTENTION