

The Deloitte Azerbaijan difference

Deloitte`s transfer pricing professionals apply in-depth knowledge and experience to help you develop the transfer pricing documentation your company needs to address the ever-changing global transfer pricing compliance requirements. We understand what the tax authorities are looking for, and we have the experience and the tools necessary to prepare consistent, accurate, and timely transfer pricing documentation.

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About Deloitte

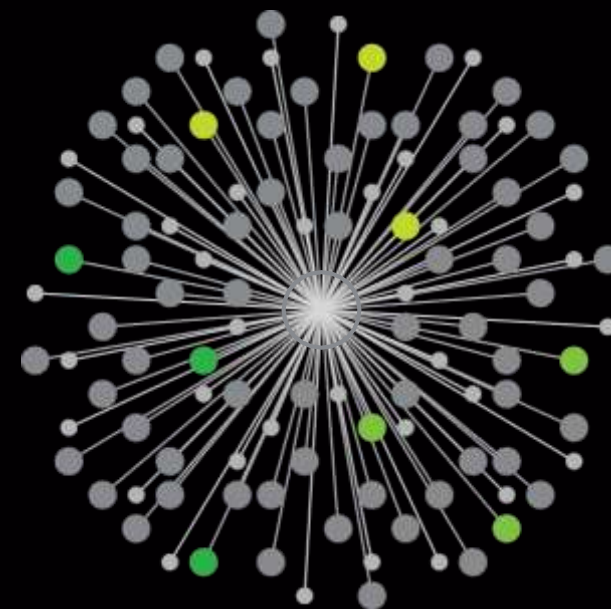
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Azerbaijan transfer pricing solutions

How do transfer pricing rules impact taxpayers?

The taxpayers should carry out **self-review** and answer the following questions:

- Does the company have controlled transactions?
- Does the total volume of the transactions for a calendar year exceed the threshold of AZN 500,000?
- Can the taxpayer prove its position in price setting?

How taxpayers can benefit from transfer pricing rule?

- To be in compliance with the statutory transfer pricing rules
- To be in-line with international tax practice
- To be able to predict tax costs properly
- To avoid extra tax assessment by the tax authorities
- To avoid application of the financial sanctions

Which are the areas of special attention from transfer pricing perspective?

- Intra-group supply of goods/ services/works
- Intra-group financing
- Transfer or use of intellectual property
- Restructuring

What is required from taxpayers?

- To prepare and submit the notification to the tax authorities by 31 March of following reporting year for the transactions exceeding AZN 500,000 per annum;
- To prepare transfer pricing documentation to support its position before the tax authorities.

How can we support you?

Transfer pricing planning and documentation

Deloitte's transfer pricing professionals assist taxpayers with Azerbaijan documentation requirements by preparing transfer pricing documentation that analyzes the arm's length nature of their intercompany prices.

We can also assist multinationals in adaptation of global transfer pricing documentation satisfying Azerbaijan tax compliance requirements in an efficient and consistent basis.

Dispute avoidance and resolution

Deloitte's transfer pricing professionals assist clients with all aspects of defending their transfer prices before the tax authorities and with local audit teams.

If an audit results in a transfer pricing adjustment, Deloitte helps with obtaining double tax relief through the tax treaty administration process.

Deloitte also helps to negotiate Advance Pricing Agreements to obtain prospective transfer pricing certainty.

Transfer pricing business process

Deloitte provides high quality, customized development and implementation of transfer pricing business process, which includes:

- Analysis of the current structure of transfer pricing business process
- Development of transfer pricing business process on a "turn-key" basis
- Development of a unified transfer pricing policy with general recommendations for structuring key processes (monitoring, price control, etc.) to comply with the requirements of the legislation
- Implementation of transfer pricing business process and its automation (including generating information required for the notification to be submitted to the tax authorities)
- Preparation of various templates for data collection, internal documents and requests, spreadsheets for calculations and monitoring deviations