
OVERVIEW OF THE MAIN CHANGES OF THE TAX LEGISLATION OF KAZAKHSTAN

January 2022


Dear Readers,

In this issue of our newsletter, we offer you an overview of the main amendments to the Kazakhstan Tax Code entering into force in different periods, mainly from 2022. In preparing this newsletter we used the following legislative acts:

- The Law of the Republic of Kazakhstan No. 382-VI "On Amendments and additions to the Code of the Republic of Kazakhstan "On Taxes and Other Mandatory Payments to the Budget" (Tax Code) and the Law of the Republic of Kazakhstan "On Enactment of the Code of the Republic of Kazakhstan "On Taxes and Other Mandatory Payments to the budget" (Tax Code)" dated December 10, 2020 (hereinafter "The Law dd 10 Dec 2020");
- The Law of the Republic of Kazakhstan No. 402-VI "On Amendments and additions to the Code of the Republic of Kazakhstan "On Taxes and Other Mandatory Payments to the Budget" (Tax Code) and the Law of the Republic of Kazakhstan "On Enactment of the Code of the Republic of Kazakhstan "On Taxes and Other Mandatory Payments to the budget" (Tax Code)" on environmental issues dated January 2, 2021 (hereinafter "The Law dd 2 Jan 2021");
- The Law of the Republic of Kazakhstan No. 53-VII "On Amendments and additions to the Code of the Republic of Kazakhstan "On Taxes and Other Mandatory Payments to the Budget" (Tax Code) and the Law of the Republic of Kazakhstan "On Enactment of the Code of the Republic of Kazakhstan "On Taxes and Other Mandatory Payments to the budget" (Tax Code)" dated June 24, 2021 (hereinafter "The Law dd 24 Jun 2021");
- The Law of the Republic of Kazakhstan No. 85-VII "On Amendments and additions to the Code of the Republic of Kazakhstan "On Taxes and Other Mandatory Payments to the Budget" (Tax Code) and the Law of the Republic of Kazakhstan "On Enactment of the Code of the Republic of Kazakhstan "On Taxes and Other Mandatory Payments to the budget" (Tax Code)" dated December 20, 2021 (hereinafter "The Law dd 20 Dec 2021").

Please feel free to contact us if you have any questions or need any additional information, we would be happy to assist.*

* This overview contains general information only. Wherein, Grant Thornton does not provide any professional or other advice or service, including of a professional character, through this overview. Grant Thornton is not responsible for any losses incurred by anyone using this overview.



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TAX ADMINISTRATION

[Amendments entered into force retrospectively from January 1, 2018 \(The Law dd 20 Dec 2021\)](#)

Tax Reporting Procedure

Starting from 2018, income tax withholding return (form 101.04) is not required to be submitted by the taxpayers in absence of taxable objects to report.

[Amendments entering into force from January 1, 2022 \(The Law dd 10 Dec 2020\)](#)

The Statute of Limitations for Large Business Entities

All large business entities classified as such in accordance with the Entrepreneurial Code of the Republic of Kazakhstan are subject to a 5-year statute of limitations period for tax purposes.

VAT Registration

The threshold value of the turnover for the purposes of VAT registration has been decreased from 30,000 times the monthly calculation index (MCI) to 20,000 MCI.

Registration of Taxpayers Engaged in Certain Types of Activities

Taxpayers who manufacture or trade (bulk or retail) gasohol, benzanol, nefras, a mixture of light carbohydrates, and ecological fuel are subject to registration.

[Amendments entering into force from January 1, 2022 \(The Law dd 24 Jun 2021\)](#)

Ensuring Fulfilment of Tax Obligations

When the tax authorities freeze a taxpayer's (tax agent's) bank account due to tax debt, a bank or an organization carrying out certain types of banking operations must unfreeze it on the day of the tax debt settlement, without waiting for the cancellation order of the tax authorities.

[Amendments entering into force from January 1, 2022 \(The Law dd 20 Dec 2021\)](#)

«Google» Tax

Starting from 2022, foreign companies providing e-commerce and digital services to individuals in Kazakhstan must register and pay 12% VAT in Kazakhstan. VAT is payable on a quarterly basis, no later than the 25th day of the second month following the reporting quarter.

When registering in Kazakhstan, in addition to the bank details, a foreign company must provide its merchant ID that is used to receive payments or money transfers.

To administer this tax, second-tier banks, organizations carrying out certain types of banking operations (from March 1, 2022) and payment institutions (from January 1, 2022) must provide information on total annual payments and transfers made by Kazakhstan individuals to such foreign companies.

TAX ADMINISTRATION

Simplified Procedure of Liquidation of Certain Categories of Taxpayers

VAT payers (resident legal entities, individual entrepreneurs, individuals engaged in private practice), who do not carry out business activities from the date of VAT registration according to their tax returns, are subject to a simplified liquidation procedure.

Tax Control

(1) The state control "Traceability of the turnover of goods" was introduced as part of the implementation of the Agreement on the mechanism of traceability of goods imported into the EAEU concluded on May 29, 2019. The purpose of the Agreement is to confirm the legality of the circulation of goods during their movement across the EAEU.

Traceability means the organization of traceable stock accounting and transactions related to the circulation of such stock using national traceability systems. Whereas the national traceability system is an information system of e-VAT-invoices that collects, records and stores information about traceable stock and transactions related to the circulation of such stock.

(2) Complex tax audits scheduled before January 1, 2022, shall be completed without auditing environmental emission levy.

This amendment is a transitional provision related to the amendments in the Environmental Code, which return to the tax authorities the competence to audit the fee for emissions into the environment.

Introduction of the Tax Mobile App Concept

The Tax mobile app concept is introduced throughout the Tax Code, which provides access to electronic services for taxpayers. The tax authorities will be able to issue tax notifications to individuals through this app.

Risk Management System (RMS)

The areas of the application of the RMS are as follows:

- selection of subjects (objects) of a tax audit carried out in a special order based on assessment of the risk degree;
- categorization of taxpayers (tax agents) by classifying them as low, medium or high risk taxpayers;
- confirmation of the authenticity of the amount of excess VAT;
- identification of the risk degree of violation identified by the results of documentary control;
- other forms of tax administration.

The amendment excludes from the Tax Code the risk criteria that are used to assess the risk degree (level) which were previously set out in the Tax Code and brings them into by-laws for more flexible and simplified opportunities to improve the RMS.

TAX ADMINISTRATION

Control over Excise Goods

According to the EAEU Technical Regulations "On the Safety of Alcoholic Beverages" and the Law of the RK "On Amendments to Certain Legislative Acts of the RK on Technical Regulation, Entrepreneurship, Improving the System of Public Administration and Payments", the term "wine material" was replaced by "bulk wine", and "beer drink" to "brewing products" throughout the text of the Tax Code.

In accordance with Article 1 Subparagraph 31) of the Law of the RK "On the Regulation of Trade Activities", excise stamps on tobacco products are replaced by "means of identification", for which no re-labeling provided.

In addition, along with importers, the post-payment of excise duty is introduced for producers of alcoholic beverages upon confirming the commitment on proper use of monitoring stamps which is secured by a bank guarantee and a pledge.

Amendments entering into force from March 1, 2022 (The Law dd 20 Dec 2021)

Mobile Payments

Mobile transfers for goods, performance of works, provision of services, will be considered as one of the forms of cash settlements. When receiving a mobile transfer, issuance of a cash register check will be mandatory.

In this regard, obligations of second-tier banks and organizations carrying out certain types of banking operations will be expanded, in particular:

- by request of the authorized body, once a year provide data on mobile payments of individual entrepreneurs («IE»), individuals engaged in private practice, legal entities;
- provide monthly total amounts of payments received on ta bank account for carrying out entrepreneurial activities of IE that apply special tax regimes and users of the tax mobile app;
- provide information on the following individuals not registered as an individual entrepreneur, whose transactions are typical for entrepreneurial activities according to certain criteria:
 - ✓ from January 1, 2022 – public servants and their spouses;
 - ✓ from January 1, 2023 – public institutions' employees and their spouses, as well as employees of quasi-state sector and their spouses;
 - ✓ from January 1, 2024 – heads and founders of legal entities and their spouses, IE and their spouses;
 - ✓ January 1, 2025 – all other individuals.

TAX ADMINISTRATION

Tax Payment Plan Installments

An installment plan for the payment of taxes and (or) fees for a period of more than one year will be provided under a pledge of real estate of a taxpayer and (or) a third party and (or) under a bank guarantee only.

When granting an installment plan, along with other types of property specified in Article 52 of the Tax Code, the only dwelling of an individual, IE, individual engaged in private practice cannot be considered a subject of pledge.

Introduction of Taxpayer's Passport

The concept of "taxpayer's passport" is being introduced to increase the level of public control over taxpayers operating in public catering and trade.

The taxpayer's passport is a card with information on the business entity contained in a barcode generated by a tax authority. The passport will be displayed by taxpayers near the cash registers and in publicly available places for information purposes and contain data, which is not tax secrecy.

CORPORATE INCOME TAX (CIT)

Amendments entering into force from January 1, 2022 (The Law dd 24 Jun 2021)

Cash Register Receipt

At the request of the buyer (client), recipient of goods, works, services, a receipt of an online cash register must contain the identification number (Business Identification Number or Individual Identification Number) of the buyer (client).

Deduction of Expenses based on Cash Register Receipts

Expenses on goods, works, services purchased from resident legal entities, branches/representative offices of non-residents, individual entrepreneurs and persons engaged in private practice, under a civil law transaction, which exceeds 1000-fold MCI (KZT 3 063 000 or approx. USD 7 000 in 2022), can be deducted based on an e-VAT-invoice or an online cash register receipt containing the identification number of the buyer (client), with some exceptions.

Deduction of Interest

The rules for the deduction of interest by subsidiaries of national companies on loans received from the parent company (national company) have been amended. According to the amendments, the following interest amounts can be deducted in full:

- in the form of a discount or coupon (taking into account the discount or premium from the cost of the initial offering and (or) the acquisition cost) on debt securities of subsidiaries held by the parent company;
- on loans received by subsidiaries from the parent company;

For the purposes of this provision, the parent company is a national company which sole participant is the national managing holding, provided that the indicated national company owns 100% of the shares (participation interest) in each of its subsidiaries.

Reduction of Taxable Income

According to the amendments in Article 288 of the Tax Code, a small business operating in manufacturing industry and applying the general tax regime is entitled to reduce its taxable income by the amount of expenses on acquisition or construction of industrial buildings and installations that meet the requirements of paragraph 4 of Article 274 of the Tax Code.

Such industrial buildings and installations are not treated as fixed assets for the purpose of corporate income tax deductions and not subject to investment tax preferences.

Social Entrepreneurship

Due to the introduction of the concept of social entrepreneurship into the Entrepreneurial Code of Kazakhstan, the Tax Code was amended correspondingly. According to the amendments, the registered social entrepreneurship entities are entitled to reduce taxable income for the amount of expenses incurred, (but not more than 120-fold MCI per employee for the tax period) to pay for trainings to master the profession, vocational training, retraining or advanced training of employees who are:

CORPORATE INCOME TAX (CIT)

- ✓ disabled people;
- ✓ parents and other legal representatives raising a disabled child;
- ✓ retired and citizens of pre-retirement age (within five years before the retirement age);
- ✓ pupils of children's villages and graduates of orphanages, boarding schools for orphans and children left without parental care, under the age of 29;
- ✓ persons released penitentiary within 12 months after release;
- ✓ ethnical Kazakhs immigrated from other countries and obtained the status of “qandas”.

Social entrepreneurs calculate property tax at a rate of 0.5% to the tax base. However, if the social entrepreneurship entity complies with several provisions of paragraphs 2, 3, 4 and 5 of Article 521 of the Tax Code, then the lowest rate is applied.

[Amendments entering into force from January 1, 2022 \(The Law dd 20 Dec 2021\)](#)

Credit Cooperatives

Taking into account that from January 1, 2022, credit cooperatives must create provisions (reserves):

- ✓ they are now entitled to deduct the amounts of expenses for the creation of provisions (reserves) against doubtful and bad assets for extended microcredits, as well as interest on them, except for the loans provided to related parties or third parties secured by a related party (paragraph 6 of Article 250 of the Tax Code).
- ✓ the amounts of provisions (reserves) deductible in the reporting and (or) previous tax periods in case of a decrease in the amount of claims against the debtor at assignment by the loan partnership of its receivables to legal entities in accordance with the relevant statutory act, the negative difference between the assigned value of the receivable and the primary value of the receivable (as of the date of assignment), are not recognized as income from a decrease in the provisions (reserves) (subparagraph 7 paragraph 5 of Article 232 of the Tax Code).

[Amendments entering into force from January 1, 2023 \(The Law dd 20 Dec 2021\)](#)

International Technological Park «Astana Hub» and Special Economic Zones (SEZs)

In case of violating the terms of participation in Astana Hub, such participants will have to apply the general tax regime from the beginning of the tax period in which the violation was committed.

Now participants of Astana Hub and organizations operating in a SEZ can reduce their CIT by 100 percent in respect of income received from the implementation of the prioritized activities. From 2023 the procedure for determining the amount of income from intellectual property and provision of services in the informatization field will be determined by the Ministry of Finance of the RK in agreement with the Ministry of Digital Development, Innovations and Aerospace Industry of the RK.

In addition, the definition of tax loss for an intellectual property object for the purposes of Astana Hub and SEZs is being introduced: such tax loss is an excess of deductions over total annual income including applicable adjustments, that is determined for each object of intellectual property, is not considered a business tax loss and can only be compensated from taxable income for each intellectual property object within the statute of limitations.

PERSONAL INCOME TAX (PIT)

Amendments entering into force from January 1, 2022 (The Law dd 20 Dec 2021)

Exclusion of the minimum salary amount deduction

Throughout the Tax Code one minimum salary was replaced by a 14-fold monthly calculation index, and the 12-fold minimum salary was replaced by a 168-fold MCIs. In particular:

- tax deduction in the amount of 14-fold MCI for each month is applied to income in the form of payments from pension savings of taxpayers;
- tax deduction in the amount of 168-fold minimum salary is applied to income in the form of pension payments of individuals at the retirement age who left abroad for permanent residence;
- income under retirement annuity is subject to a tax deduction in the amount of 14-fold MCI for each month of accrual of income;
- standard deduction in the amount of 14-fold MCI for each month;
- deduction of 14-fold MCI for each month is applied to the income of a resident labor immigrant.

VALUE ADDED TAX (VAT)

Amendments entering into force from January 1, 2022 (The Law dd 24 Jun 2021)

Requirements on e-VAT-invoice Issuance

Certain taxpayers are not required to issue an electronic VAT-invoice when selling to:

- 1) individuals who use purchased goods for personal use (final consumption);
- 2) subjects of micro-entrepreneurship in accordance with the Entrepreneurial Code of Kazakhstan.

Such persons are entitled to request from the supplier of the goods, works, services to issue an invoice, and the supplier must fulfill such a requirement

Amendments entering into force from January 1, 2022 (The Law dd 20 Dec 2021)

Simplified VAT Refund Procedure

Entities that converted at least 50 percent of the foreign exchange earnings received from the export of raw materials for the tax period are entitled to apply the simplified excess VAT refund procedure to up to 80 percent of the excess VAT amount accumulated in the reporting tax period. The list of such business entities is approved by the Government.

EXCISE DUTY

[Amendments entering into force from January 1, 2022 \(The Law dd 20 Dec 2021\)](#)

Excise Duty Rate

Excise duty rates on brewing products have been increased from 57 KZT/liter to 79 KZT/liter.

Identification Means

Means of identification withdrawn from circulation due to defect, loss, damage in accordance with the notice of withdrawal under the laws of the RK on the regulation of trade activities are exempt from excise duty.

According to the amendments in Article 475 of the Tax Code, the excise duty on alcoholic beverages except for bulk wine and brewing products, is paid by producers of alcoholic beverages by choice:

- until the receipt of monitoring stamps, or
- on the day of shipment (transfer) of alcoholic beverages upon providing the proper use of monitoring stamps.

OTHER TAXES AND PAYMENTS TO THE BUDGET

Amendments entered into force retrospectively from January 1, 2021 (The Law dd 20 Dec 2021)

Vehicle Tax on Specialized Trucks

In accordance with the changes in Article 492 of the Tax Code, the following types of vehicles are considered trucks:

- specialized category B trucks with a rigid closed body mounted on a car chassis or a wagon type body with a partition separating the cargo compartment, designed for the transport of industrial, food and agricultural goods, equipped with devices for stacking and securing cargo inside the body (vans);
- category B general-purpose flatbed trucks (except for pickup trucks).

This change was made to reduce the costs of small and medium-sized businesses during the pandemic.

Amendments entering into force after the day of enactment of a legislative act regulating the establishment and operation of a Nuclear Safety Zone (The Law dd 20 Dec 2021)

Land in the Nuclear Safety Zone

For harmonization of the Tax Code provisions with the draft law «On the Semipalatinsk Nuclear Safety Zone», the Law dd 20 Dec 2021 introduced the separate category of land of nuclear safety zone, which is not subject to taxation.

Buildings, constructions located in the lands of nuclear safety zone used for placement of radioactive waste and providing nuclear physical protection are not subject to property tax.

The zero coefficient is applied to the rates established for transuranic, alpha-radioactive, and beta-radioactive waste at calculating the amount of the fee for negative impact on the environment by legal entities disposing radioactive waste generated as a result of nuclear tests conducted in the territory of Kazakhstan in the lands of nuclear safety zone.

Amendments entering into force from January 1, 2022 (The Law dd 2 Jan 2021)

Fee for a Negative Impact on the Environment

The Law dd 2 Jan 2021 was adopted in connection with the introduction of the new Environmental Code No. 400-VI dd January 2, 2021.

The words “emissions into the environment” were replaced by the words “negative impact on the environment”, and the words “placement” in relation to waste were replaced by “disposal” throughout the Tax Code.

The fee for a negative impact on the environment is charged for emissions and discharges of pollutants (emissions into the environment), placement of open sulfur on sulfur pads and disposal of waste carried out based on an appropriate environmental permit and declaration on the impact on the environment in accordance with the environmental legislation of the RoK.

Payers of the fee are operators of objects of I, II and III categories, determined in accordance with the Environmental Code of the RoK.

OTHER TAXES AND PAYMENTS TO THE BUDGET

The object of taxation is the actual volume of negative impact on the environment (weight, activity measurement unit - for radioactive waste) in the reporting period (for objects of I and II categories - within the declared volume), and also established by results of implementation of control on compliance with the environmental legislation of the RoK (state environmental control) by the authorized body in the field of environmental protection and its territorial bodies of state environmental, in the form of:

- 1) emissions of pollutants;
- 2) discharges of pollutants;
- 3) disposal waste;
- 4) placed sulfur in the open form on sulfur pads formed during exploration and (or) production of hydrocarbons.

According to the Environmental Code of the RoK, objects that have a negative impact on the environment depending on the level and risk of such impact are divided into following four categories:

- 1) objects of the I category - objects that have significant negative impact;
- 2) objects of the II category - objects that have moderate negative impact;
- 3) objects of the III category - objects that have insignificant negative impact;
- 4) objects of the IV category - objects that have minimum negative impact on the environment.

Types of activity and other criteria for classifying objects that have a negative impact on the environment as objects of I, II or III categories are established by Appendix 2 of the Environmental Code.

According to the amendments, from January 1, 2025, the Tax Code establishes new rates and coefficients for the fee, depending on the types of activities and availability of an environmental permit.

[Amendments entering into force from January 1, 2022 \(The Law dd 24 Jun 2021\)](#)

Fee for Digital Mining

Chapter 69 of the Tax Code was supplemented with Paragraph 11 "Fee for digital mining", for the purposes of state regulation of mining and promotion of the industry of extracting cryptocurrencies in Kazakhstan, increase of income from mining, as well as reduction of uncontrolled consumption of electricity by mining farms.

The fee for digital mining is charged on the digital miners for the amount of electricity consumed. The authorized body in the field of information security (the Ministry of Digital Development, Innovations and Aerospace Industry of the Republic of Kazakhstan), on a quarterly basis, no later than the 15th day of the second month following the reporting quarter, submits to the tax authorities information on payers of the fee.

The fee rate is 1 KZT per 1 kilowatt-hour of electrical energy consumed in digital mining. Payers calculate and pay the fee on a quarterly basis no later than the 20th day of the month following the reporting quarter.

SPECIAL TAX REGIME (STR)

Amendments entering into force from January 1, 2022 (The Law dd 26 Jun 2021)

STR Based on a Special Mobile App

Concept and requirements for application

The law introduced a new type of special tax regime (hereinafter "STR") - STR based on a special mobile app (paragraph 2-1 of Chapter 77 of the Tax Code).

A special mobile app is a mobile app developed by an authorized body for the purpose of applying a simplified procedure for the fulfillment of tax obligations and obligations on social payments, registration/de-registration as an individual entrepreneur on the basis of e-document certified by an electronic digital signature of the taxpayer.

Tax regime

The STR based on a special mobile app establishes for individual entrepreneurs (hereinafter - "IE") a simplified procedure for the calculation and payment of personal income tax (PIT) (except for taxes withheld at the source of payment), social payments (mandatory pension contributions, compulsory professional pension contributions, social security contributions, contributions to compulsory social medical insurance). These taxpayers do not pay social tax.

The rate of the applicable PIT is 1%. The rates of social payments are determined by the relevant laws.

According to the Law dd 20 Dec 2021, until January 1, 2023, individuals applying STR based on a special mobile app are entitled to reduce personal income tax (except income tax withheld) by 100 percent.

The procedure for determining income when applying the STR based on a special mobile app is similar to the procedure for determining income when applying the STR based on a patent or a simplified tax reporting.

Supporting Documents

Taxpayers operating based on the special mobile app are exempt from the obligation to use online cash registers.

In the special mobile app, a receipt of the special mobile app is generated as a supporting document confirming the transaction between an IE applying the STR and the buyer (client).

A special mobile app generates a register of income based on the receipts of a special mobile app and other information about income received from other sources.

SPECIAL TAX REGIME (STR)

Amendments entering into force from January 1, 2023 (The Law dd 20 Dec 2021)

List of Activities for STR

The list of activities of business entities not entitled to apply special tax regime for small businesses will be expanded to include the following activities as well:

- Marketing services;
- Leasing and operation of the retail market;
- Leasing and management of own real estate used (to be used) in business activity (except for housing);
- Subleasing of retail facilities (retail markets) and management of such leased facilities;
- Activities of two or more taxpayers providing hotel services on the territory of one hotel or separate buildings where such services are provided.

These changes are aimed at excluding tax optimization schemes by splitting the business in order to avoid registration as a VAT payer as well as exceeding the income limit set for using STR.

SINGLE AGGREGATE PAYMENT

Amendments entering into force from January 1, 2023 (The Law dd 20 Dec 2021)

The list of entities not recognized as payers of the single aggregate payment (SAP) will be expanded to include the followings:

- entities performing the following activities:
 - ✓ consulting and/or marketing services;
 - ✓ activities in the field of accounting or auditing;
 - ✓ financial, insurance and intermediary activities of an insurance broker and insurance agent;
 - ✓ activities in the field of law and justice;
- entities providing services based on agency contracts (agreements)*

* Agency contracts (agreements) shall mean civil law contracts (agreements) concluded under the laws of Kazakhstan, where one party (agent) undertakes for a fee to perform on behalf of the other party certain actions in its own name but at the expense of the other party or in the name and at the expense of the other party.

AGREEMENT ON INVESTMENT COMMITMENTS

Amendments entering into force from January 1, 2022 (The Law dd 20 Dec 2021)

Due to the introduction of a new type of investment agreement – the Agreement on Investment Commitments (Agreement), which will provide taxpayers a guarantee of stability of tax legislation – the Tax Code has been amended correspondingly.

According to new Article 712-4, an entity that concluded the Agreement is a legal entity that meets the following criteria simultaneously:

- 1) concluded an agreement on investment commitments with the Government of the RK in accordance with the Entrepreneurial Code of the RK;
- 2) is an export-oriented commodity producer except for exporters of hydrocarbon minerals and oil products. An export-oriented commodity producer is a legal entity whose income from sales for export is not less than 70 percent of the total annual income for the year preceding the year of application for conclusion of an agreement on investment commitments;
- 3) is a major taxpayer on horizontal monitoring including participation in the pilot project for horizontal monitoring;
- 4) does not produce excise goods;
- 5) does not apply special tax regimes.

If the Agreement is terminated early, the tax stability guarantee shall be cancelled from the date of its conclusion. If at the time of termination of the agreement, at least 90% of the amount has been financed in accordance with the Entrepreneurial Code of the RK, the tax stability guarantee shall be cancelled as of January 1 of the year in which the agreement is terminated.

Calculation of taxes and payments shall be in accordance with the tax regime effective at the time of conclusion of the agreement for 10 years starting from January 1 of the year in which such agreement was concluded. The tax regime applies to the following taxes and payment:

- ✓ VAT;
- ✓ Excise duty;
- ✓ Payment for the negative impact to the environment (emissions into the environment);
- ✓ Personal Income Tax;
- ✓ Withholding Tax.

If certain taxes and payments to the budget are cancelled through the years, the taxpayer continues to pay them to the budget in the order and amount stipulated by the tax legislation effective at the time of conclusion of such agreement.

The statute of limitation for such Agreement shall be the entire period of validity of the agreement plus five years starting from January 1 of the year following the year of its termination.