

Russia

Summary of CbC Reporting and Transfer Pricing Documentation Rules

Country-by-Country Report

- Effective Date: Financial years beginning on or after January 1, 2017.
- Filing Threshold: Russian MNEs with annual consolidated revenue of at least RUB 50 billion in the previous fiscal year. If the ultimate parent entity is resident outside Russia, the threshold is the same as the CbCR threshold in the jurisdiction of residence of the ultimate parent entity.
- Local Filing: A Russian constituent entity may be required to file a CbC report if certain conditions are met.
- Information Reported: Generally consistent with OECD guidance.
- Language: Russian, except a foreign language is acceptable when the parent company of the MNE group is resident outside Russia.
- Forms/Filing Instructions (see Bloomberg Tax International Tax Forms database):
 - CbC Notification of Participation in an MNE Group: filed electronically via the Federal Tax Service website.
 - CbC Report: filed electronically via the Federal Tax Service website.
- Deadline for Filing CbC Notification of Participation in an MNE Group: Within 8 months after the end of the reporting financial year.
- Deadline for Filing CbC Report: Within 12 months after the end of the reporting financial year, if the ultimate parent entity is a Russian entity (non-resident entities must submit the CbC report when requested by the tax authority).
- Penalties: From financial year 2020, a penalty of RUB 50,000 may apply for failure to properly prepare and submit the CbC notification. A penalty of RUB 100,000 may apply for failure to properly prepare and submit the CbC report.
- Exchange of Information:
 - MCAA CbC: signed.

For a schedule of CbC report and CbC notification deadlines (by country), please see [CbC Reporting Deadlines](#).

Master File

- Effective Date: Financial years beginning on or after January 1, 2017.
- Filing Threshold: Russian MNEs with annual consolidated revenue of at least RUB 50 billion in the previous fiscal year. If the ultimate parent entity is resident outside Russia, the threshold is the same as the CbCR threshold in the jurisdiction of residence of the ultimate parent entity.
- Information Reported: Generally, consistent with OECD guidance, with some modifications.
- Language: Russian.
- Deadline for Submission: Can be requested by the tax authorities no earlier than 12 months after the end of the reporting year or no later than 36 months and should be provided within 3 months of request.

Bloomberg Tax

- Penalties: From financial year 2020, a penalty of RUB 100,000 may apply for the failure to properly prepare and submit the master file.

Local File

- Effective Date: Financial years beginning on or after January 1, 2018.
- Filing Threshold: Russian MNEs with annual consolidated revenue of at least RUB 50 billion in the previous fiscal year. If the ultimate parent entity is resident outside Russia, the threshold is the same as the CbCR threshold in the jurisdiction of residence of the ultimate parent entity.
- Information Reported: Generally consistent with OECD guidance.
- Language: Russian.
- Deadline for Submission: Can be requested by the tax authorities no earlier than June 1 of the year following the calendar year in which the controlled transactions were conducted and should be provided within 30 days of a request.
- Penalties: From financial year 2018, a penalty of RUB 100,000 may apply for the failure to properly prepare and submit the local file.

Transfer Pricing Documentation

Taxpayers are recommended to prepare and maintain transfer pricing documentation for transactions subject to transfer pricing control that are not required to be included in the Local File. Related party cross-border transactions are subject to transfer pricing control if the transactions for the year exceed RUB 60 million. In addition, cross-border transactions between unrelated parties associated with the sale of commodities or transactions with residents located in a low-tax jurisdiction are subject to transfer pricing control if the transactions for the year exceed RUB 60 million. In general, the following transactions are not subject to the documentation requirement: (i) transactions in which prices are set in accordance with antitrust order or regulated by the relevant government authorities; (ii) transactions with unrelated parties; (iii) transactions with publicly traded securities and derivatives; and (iv) transactions covered by an advance pricing agreement.

The documentation should be prepared in the Russian language. The transfer pricing documentation can be requested by tax authorities during a transfer pricing audit starting from June 1st of the year following the calendar year in which the controlled transactions were conducted. If requested, the documentation must be provided within 30 business days of the request.

For more detailed guidance, please see the Transfer Pricing Portfolio: [Russia, Chapter 140:VI.A](#) (General Reporting Requirements).

Transfer Pricing Disclosure

Taxpayers are required to file the Notification on Controlled Transactions to disclose controlled transactions. The notification is due by May 20th of the year following the calendar year in which the transactions were conducted. A penalty of RUB 5,000 may apply for the failure to properly prepare and submit the disclosure.

For more detailed guidance, please see the Transfer Pricing Portfolio: [Russia, Chapter 140:VI.A](#) (General Reporting Requirements).