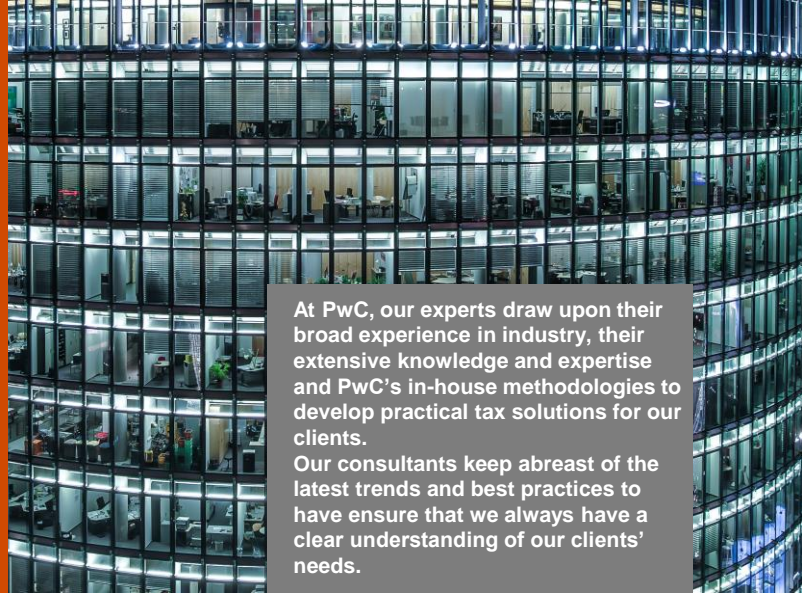




Taxation: metals and mining



At PwC, our experts draw upon their broad experience in industry, their extensive knowledge and expertise and PwC's in-house methodologies to develop practical tax solutions for our clients. Our consultants keep abreast of the latest trends and best practices to have ensure that we always have a clear understanding of our clients' needs.

Our services



International tax services

- Application of the beneficial owner of income concept
- Analysis of corporate structures for risks related to the recognition of foreign companies as Russian tax residents
- Income taxation of controlled foreign companies (CFCs)
- Development of tax-efficient management structures for Russian and foreign entities that are part of a group of companies
- Development of recommendations on maintaining an overseas presence, modelling the tax implications and structuring the contractual relations



Transfer pricing services

- Market research of the metals industry
- Diagnostics of intragroup transactions
- Preparation and submission of three-level transfer pricing documentation



Advice on customs issues

- Matters pertaining to the purchase of imported equipment and eligibility for customs benefits
- Analysis of tax and customs implications related to changes in the structure of supplies



Digital technologies in taxation

- Optimisation of receivables collection via big data processing and machine learning tools
- Automation of information exchange with the tax authorities
- Automation of risk management and internal control systems
- Automation of the tax function
- Visualisation of tax indicators



Analysis of tax matters related to the codification of unjustified tax benefits



Analysis of tax matters related to the signature of concession agreements



Tax matters related to the accounting treatment of fixed assets



Obtainment of resident status in Priority Social and Economic Development Areas and Special Administrative Regions



Development of internal structures for finance and corporate treasury functions



Consulting on tax and accounting matters related to the dividends distribution



Transactions with securities and tax aspects of IPOs



Consulting on tax and financial accounting for derivative financial instruments



Estimation of tax risks related to debt forgiveness by a shareholder



Tax monitoring and tax risk management



Benchmarking of tax risks in the metals industry



Classification of property as movable or immovable



Analysis of tax matters related to employee bonuses and remuneration of shareholders



Seminars on taxation and accounting





We would like to emphasise the professionalism of the PwC team, their deep understanding of the mining industry and their responsiveness to our company's needs. All the work was performed under the approved schedule and always completed before the deadline - a key feature of our work with PwC.

(a representative of one of the leading mining companies)

Why PwC?



The PwC tax practice network encompasses 50,000 tax professionals in more than 150 countries. It is the largest practice in terms of headcount, revenue and geographical scope.



PwC Russia covers 92% of the mining industry in terms of the number of clients across all lines of service.



Our client base in Russia comprises over 3,000 companies, including 280 companies from the RAEX-600 rating.



Nine out of the ten largest metals and mining companies are PwC Russia clients.



Galina Naumenko, PwC Russia Partner, has been included in the Expert Guide 2020 Tax Leaders category.



We have industrial experience and product specialisation. We provide our services in a comprehensive way in close cooperation with other PwC teams.



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PwC Russia (www.pwc.ru) provides industry-focused assurance, advisory, tax and legal services. Over 3,000 people work in our offices in Moscow, St Petersburg, Ekaterinburg, Kazan, Novosibirsk, Rostov-on-Don, Krasnodar, Voronezh, Vladikavkaz, Perm and Nizhny Novgorod. We use our in-depth knowledge, wealth of experience and creative approach to problem-solving to develop sound advice and practical solutions that can open up new vistas for business.

PwC refers to the PwC network and/or one or more of its member firms, each of which is a separate legal entity. Together, these firms form the PwC network, which includes over 276,000 employees in 157 countries. For more detailed information, please visit our website at <http://www.pwc.ru/ru/about.html>

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