

Amendments to the DTTs with Austria, Ireland and Cyprus

According to the Ordinance of the Cabinet of Ministers No. 677 p of 1 July 2015, Austria has been withdrawn from the list of countries, with which trade transactions are subject to enhanced control within the framework of implementation of the law on transfer pricing.

As indicated in the Ordinance, the decision was adopted on the basis of the note submitted by the Embassy of Austria in Ukraine. The diplomatic officials expressed their readiness to review the Convention between the Government of Ukraine and the Government of the Republic of Austria on avoidance of double taxation and prevention of tax evasion regarding the tax on revenues and property in the section of extended tax information exchange.

It is also worth mentioning that on 15 July 2015, the Verkhovna Rada of Ukraine ratified the Convention on avoidance of double taxation with Ireland. The Convention covers the corporate and individual income tax in Ukraine and profit tax, universal social charge, corporate tax and tax on revenues from alienation of property in Ireland.

In the nearest future, signing of the new Convention on avoidance of double taxation with Cyprus is expected. The principal amendments in the new edition of the Convention shall concern increasing tax rates on certain types of passive income.