Finland; Kazakhstan

Multilateral Instrument (MLI) – Finland Publishes Updated English, Finnish and Swedish Synthesized Texts of Finland-Kazakhstan Treaty

5 January 2024

Report from IBFD Tax Treaties Unit

The Finnish Ministry of Justice recently published updated versions of the English, Finnish, and Swedish synthesized texts of the Finland - Kazakhstan Income Tax Treaty (2009), displaying the modifications made to the treaty by the MLI and specifying additional effective dates with Kazakhstan. These documents were prepared by the competent authority of Finland and represent its understanding of the modifications made to the treaty by the MLI.

The publication of the updated texts follows Finland's deposition of a notification under article 9 of the MLI on 27 June 2023 (for previous reporting, see Multilateral Instrument (MLI) – Finland Deposits Notification Subsequent to Ratification (29 June 2023)).

Finland and Kazakhstan deposited their instrument of ratification of the MLI on, respectively, 25 February 2019 and 24 June 2020. The MLI therefore entered into force for Finland on 1 June 2019 and for Kazakhstan on 1 October 2020.

Kazakhstan deposited an additional notification on its covered tax agreements under article 29(6) of the MLI on 26 November 2020 (see Multilateral Instrument (MLI) – Kazakhstan Deposits Notifications Under Article 29(6) (27 November 2020)).

Each of the MLI provisions could take effect on different dates, depending on the types of taxes involved (taxes withheld at source or other taxes levied) and on the choices made by Finland and Kazakhstan in their MLI positions (for earlier reporting, see Multilateral Convention (MLI) – Finland Publishes English, Finnish and Swedish Synthesized Texts of Finland-Kazakhstan Treaty (29 October 2021)).

For more details, check the synthesized text on IBFD's Tax Research Platform: Finland - Kazakhstan Income Tax Treaty (2009) (English MLI synthesized text 2020).

The purpose of the synthesized text is to facilitate the understanding of the application of the MLI but it is not in itself a source of law.

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