

Transfer Pricing Alert

October 2023

Tax
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Plans to extend deadline for TPR-C and TPR-P reporting for 2022 and the publication of the interactive TPR form for 2022

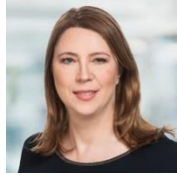
On October 27 this year, the Ministry of Finance announced that work is currently in progress to extend the deadline for filing information on transfer prices (form TPR-C and TPR-P).

According to the Ministry of Finance's publication, a draft regulation on the issue is currently in internal consultation.

Extension of the deadline for TPR for 2022 – announcement by Ministry of Finance	<p>On October 27 this year, the Ministry of Finance published an announcement about ongoing work to extend the deadline for filing information on transfer prices (<u>TPR-C and TPR-P forms</u>) by 3 months.</p> <p>The draft regulation on this matter is currently being discussed internally, and it is scheduled to be made available for external consultations next week.</p>
Publication of the new TPR form for 2022	<p>Additionally, on October 30 this year, the Ministry of Finance has published new interactive TPR forms (so-called web version forms) - TPR-C and TPR-P, respectively. The forms are used for transfer pricing reporting for the tax year starting after December 31, 2021.</p> <p>The form should be filled out directly on the website, then signed and submitted to the appropriate tax office for the taxpayer. In the coming days, the forms provided will be further tested in terms of their technical capabilities. According to information provided by the Ministry of Finance, other tools - commercial ones, developed on the basis of previously provided schemes – can also be used for filling the forms.</p> <p>It should be borne in mind that the submission of TPR forms in a new form not used previously may still cause technical problems. Therefore, it is recommended to confirm the technical possibilities of filing them by Members of the Management Board.</p>
Reporting guidelines of the Ministry of Finance	<p>Additionally, according to the announcements of the Ministry of Finance, the guidelines of the Ministry of Finance regarding the filling of forms for 2022 should be published in near future. Guidelines may dispel doubts related to the process of signing and submitting information on transfer prices, e.g. by foreign Management Board Members.</p>

This document has been prepared for information purposes only and covers general nature. Before taking any action based on the above information, we recommend that you obtain a valid opinion of TPA experts.

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