

## ***Transfer pricing in your company – Are you ready to defend it by the tax control?***

In the current ongoing audit season you have already been or will be probably faced by the auditing companies with the issues of **transfer pricing**, which is currently very up-to-date topic for companies which carry out cross-border transaction within the group.

For the oncoming period we expect almost certainly, that the tax office controllers will increase their focus on the existence of **transfer pricing documentation**. Get ready for it and avoid the problematic proving of the transfer pricing practices applied in your company. Put the transfer pricing documentation together as soon as possible.

### *Transfer pricing documentation*

In case your company carries out the cross-border transactions within the group, you are obliged to submit the required documentation on request of the tax control. Our team of tax advisors is ready to help you with the complicated project of compilation the documentation that governs the **pricing of controlled transactions** in your company and serves for the evidence of other circumstances having an impact on pricing of these transactions.

We are ready to elaborate the documentation according to your needs in extent of:

- **“General documentation”** (concerning information about the entire group of companies) and **“Specific documentation”** (concerning information about your entity) in case your company is an accounting entity booking according to international financial reporting standards (IFRS)
- **“Simplified documentation”** in case your company is an accounting entity booking according to the local Slovak accounting standards

Most of the tax payers refer to the second group and are obliged to submit the **“Simplified documentation”** which includes:

- Information about your company, its business activity and role within the group
- Information about the controlled transactions
- Information about the method of transfer price calculation for particular controlled transactions
- Information about other circumstances having an impact on the transfer price

The compiled documentation does not have to be approved in advance by the Tax Office, however it must include enough information which are necessary for proving the chosen transfer pricing method. accace recommends to let the documentation to be verified by the Tax Office and this way to avoid any disputes by the tax control.

### *Additional consultancy related to transfer pricing*

The compilation of the transfer pricing documentation is preceded by the complex analysis in the form of consulting provided in the area of **transfer pricing strategy planning**.

- We will advise you by the choice of the **most suitable transfer pricing method** with the aim to increase tax efficiency within the scope of the tax legislative in force.
- After a thorough consideration of all your transactions with dependent parties we will the **evaluate consequent risks** and suggest measures for their minimization.
- Within all your duties related to transfer pricing we will **act in front of the respective Tax Office and by the tax control** on your behalf.