



CORE

## **Transfer pricing - a priority for the Ministry of Finance**

On 18th of December 2015, the Ministry of Finance issued a statement in which the control of transfer pricing was listed as one of the top priorities.

The Minister of Finance has decided to make organizational changes in tax administration and to allocate additional funds for control of transactions between related parties.

Taking into account the guidelines recommended by the Ministry of Finance, and also the changes from 2017, it can be said that in the near future transfer pricing will be the most exposed to control by the tax authorities.

From the information received informally it can be concluded that intensified controls on transfer pricing documentation are planned already since April 2017.

Therefore, companies should check (prepare) the documentation of transfer pricing for the previous years (2011-2016) as regards the conditions of transactions executed and the prices charged.

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