

ABSTRACT

The new regulations that have been introduced since 2017 extend significantly the scope of the TP documentation and reporting requirements to be provided to tax authorities. Therefore they increase administrative and financial burden in particular for multinational enterprises. Taxpayers should prepare for next changes (2019) by i.a. assessing the necessary resources to complete the extended reporting requirements and developing revised standards of intercompany TP documentation (master file, local file, benchmarking analysis). As a consequence, the preparation of TP documentation should no longer be regarded as a purely compliance exercise but instead should become an inherent part of the capital group's tax risk management.

Keywords: TP documentation, master file, local file, benchmarking analysis