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BROCHURE

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BROCHURE ■ ARTICLE ■ INFORMATION ■ OVERVIEW



Transfer pricing in Slovakia

Transfer pricing and transfer documentation
Analysis – free of charge



November 2017



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Since 2015 it has been an established requirement to maintain transfer documentation for all resident taxable persons who conduct monitored transactions between related parties. Related party shall mean a close party or another party which is economically, personally or otherwise connected to the first party.

The transfer documentation is executed for every transaction separately (this is important because it can't be executed automatically for every issued invoice). Its aim is to explain whether or not the price for each transaction belonging to the monitored transactions between the related parties (for example the price for leasing, or selling goods) shall be equal as if the transfer was carried out between unrelated parties. The tax authority may request that you present the tax documentation at any time. The deadline for submission of the documentation is within 15 days of the tax authority's request. This period can't be extended even upon agreement with the tax administrator. A penalty up to 3000.00 EUR can be imposed for non-compliance with the transfer pricing documentation. The penalty can be imposed repeatedly (the documentation must be submitted even if the penalty was paid).

Examples:

1. Company XY Ltd has an ownership interest in ABX Ltd company. Transactions between them (loans, buying or selling goods, lease etc.) shall be accompanied by transfer documentation as they constitute two economically linked entities.
2. Mr. Andrew H is the managing director of both business entities. His is an issue of interpersonal link of these companies. In case of an audit, the transactions between them shall be accompanied by transfer documentation.

Our company draws up the transfer pricing documentation in these versions: simplified, basic and full (we will help you to specify the most appropriate type of documentation) in cooperation with our tax advisor. Through consultations we will advise you how to avoid any suspect transactions, which would be the focus of a tax audit and how to optimize your tax policy.

Simplified transfer pricing documentation	Basic transfer pricing documentation	Full transfer pricing documentation
Based on data provided by your company we will draw up the complete simplified documentation	Based on data provided by your company we will draw up the complete simplified documentation	Based on the consultations and data provided by your company we will draw up the complete full transfer documentation
Price * 990,- EUR	Price * 1.990,- EUR	Price * 3.990,- EUR

* This price is not final. The price may vary (+/-) according to the complexity of a case.

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If you can't determine whether transfer pricing documentation is required for a certain transaction carried out by your company, please contact us and we will make an analysis free of charge

For more information, please contact:

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