

Transfer Pricing Alert

KPMG in Poland

March 2018

The deadlines for compliance with tax obligations regarding transfer pricing have been extended

On March 15th 2018 the Decree of the Minister of Finance on the prolongation of deadlines for compliance with certain obligations in the field of tax documentation was published in the Polish Journal of Laws. The previous deadlines have been extended to the end of the ninth month after the end of the tax year.

The Decree provides for the extension of the deadlines for:

- preparation of the tax documentation,
- submitting a statement on the preparation of the tax documentation to the tax authorities,

- attaching a simplified report on related party transactions (on CIT/TP or PIT/TP forms) to the annual tax return.

The Decree prolongs the deadlines from the Corporate Income Tax Act and the Personal Income Tax Act originally set at the date of submitting the annual tax return.

The extension of the deadlines for preparation the tax documentation relates to all parts of the transfer pricing documentation, i.e. the Local File documentation, the benchmarking analyses as well as the information about a group of related parties – the Master File.

It should be noted that the taxpayers who will take advantage of the extended deadline for submitting the statement on the preparation of the documentation or a simplified report on related party transactions (CIT/TP or PIT/TP) are still obliged to file an appropriate tax return within the original deadline.

According to the Decree, the extension applies to the deadlines expiring in 2018 and 2019.

Should you require any consultation in the above area, please do not hesitate to contact us.

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