

Transfer Pricing Alert

Issue 91 | May 2025



4 Weeks to Go! Transfer Pricing filing in Madagascar due by 30 June 2025

In 2021, Transfer Pricing (“TP”) documentation guidelines were introduced in Madagascar. However, these were not legally binding at the time. With the enactment of the 2024 Finance Law in June 2024, the submission of transfer pricing documentation has become a legal obligation. Below are the key details:

Reporting Obligation – Due 30 June 2025

- All entities that are duly incorporated in Madagascar and have carried out intra-group transactions or transactions with entities in low-tax jurisdictions must comply with TP documentation requirements.
- The filing deadline applies annually by 30 June, regardless of the company's financial year-end.
- The first filing covers the period 1 January to 31 December 2024.
- The following must be submitted by 30 June each year as per a specific template:
 - Group organizational chart.
 - Details of each type of controlled transaction and the relevant affiliated entities.



Documentation Obligation – Due by 30 September 2025

- In addition to the reporting obligation, entities must submit TP documentation within 90 days after the reporting deadline (i.e. by 30 September) as per a specific template if:
 - The total value of intra-group transactions equals or exceeds MGA 450 million (approximately USD 98k), and
 - The entity:
 - Has annual turnover or total assets \geq MGA 40 billion (approximately USD 9m), or
 - Is part of a group with consolidated turnover or assets \geq MGA 240 billion (approximately USD 52m).

Penalty for Non-Compliance

- Failure to submit TP documentation may result in a fixed penalty of MGA 10 million (approximately USD 2,500).

Other information

- The burden of proof lies with the taxpayer.
- All documentation must be prepared and submitted in either French or Malagasy.

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How KPMG Mauritius can assist

- Preparing and completing the required transfer pricing documentation.
- Preparing benchmarking report for related party transactions.
- Liaising with the tax authorities in relation to any tax enquiries.



Wasoudeo Balloo
Partner, Head of Tax
KPMG in Mauritius
T: (230) 406 9891
M: (+230) 59402367
E: wballoo@kpmg.mu



Kevin Mees
Senior Manager, Tax
KPMG in Mauritius
T: (+230) 406 9768
M: (+230) 57725480
E: kmees1@kpmg.com



Karan Sookral
Manager, Tax
KPMG in Mauritius
T: (+230) 406 9845
M: (+230) 57599206
E: karanveersookral@kpmg.mu



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This document is based on our interpretation of the current tax laws and international tax principles. These laws and principles are subject to change occasioned by future legislative amendments and court decisions. You are therefore cautioned to keep abreast of such developments and are most welcome to consult us for this purpose.

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