Japanese Desk Newsletter (1-1/1)

KPMG Hungary
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Implications of the new draft transfer pricing decree for businesses



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This update is a summary of the following our Legal Alert. Please see it in detail.

What are the implications of the new draft transfer pri - KPMG Hungary

The Ministry of National Economy has published the draft of a new decree on transfer pricing documentation and transfer pricing data disclosure. The new rules are mandatory from the 2026 financial year

Below we summarize the most important changes and their expected impact on transfer pricing documentation:

1. Exemption threshold for documentation

Master file	HUF 500 million in the total value of related party transactions
Local file	Transaction at less than HUF 150 million

2. Mandatory demonstration is required on the benefits of received services from the following perspective
   - Detailed description on benefit of received services
   - Deeper functional analysis with using the five comparability criteria
3. Introduction of simplified documentation for low value-adding intra-group services
   - For buyers: Less than 5% mark-up
   - For sellers: More than 5% mark-up

   * Note: certain additional conditions are required to enjoy the simplified documentation.
4. More standardized database searches and benchmarking studies especially in the following perspective
   - New territorial restrictions
   - Sample size requirements
5. Mandatory segmented statement of operating profit by activity (when applying TNMM)

   *Note: The allocation must cover all activities, meaning that there can be no unallocated items.

Examples of our scope of support (Please feel free to get in contact with us)

- Review and clarification of current regulatory requirements
- Support on the transformation of documentation and data reporting according to the new requirements
- Optimization of administration aligning documentation rules with the requirements currently expected during tax authority audits.

Japanese practice in Hungary

We picked up this topic in our past webinar, please also see the following link. Wide screen template

KPMG Poland Japanese Desk Webpage:
KPMG Global Japanese Practice in Hungary - KPMG Hungary



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