



Transfer pricing: almost 400 TP audits, errors in TPR forms submitted

Dear Sir / Madam,

We have further arguments confirming the conviction that transfer pricing is of interest to tax authorities and that the area is worth more focusing on.

The data of the Ministry of Finance

- As the Ministry of Finance informed us, last year there were 395 TP audits conducted. It is over 200 more than in 2019, when 193 entities were audited.
- The total value of income assessed as a result of settlements made in TP audits was 1 336 392 868,52 PLN. For the previous year, 2019, the value was a bit higher and amounted to 1 553 351 848 PLN.
- Simultaneously, at least 3,08% (as of June, 28) of TPR-C and TPR-P forms were filled out incorrectly. As the Ministry of Finance explains, this value was determined based on the TPR corrections made by the taxpayers and their requests of cancellation of the forms submitted. It is possible that other errors were or are to be found within the TP audits conducted.

Almost 400 audits

More than 3% TPR forms corrected

It is a good idea to plan
TP reporting for 2020

- We inform you about these facts now **for you to start fulfilling TP obligations this year sooner and, in case of identification TP risks you were not aware of previously, to give you a chance to take action to minimize them.**
- We remind you about our 6 steps to TP without (active) repentance (<https://www.kochanski.pl/en/6-steps-to-tp/>) and we encourage you to contact us for further assistance.

We invite you to keep track of news on our site. We will soon invite you for a free event during which we will show you how to fill in the TPR-C form and which information will be particularly essential for the tax authorities.

Contact



Barbara Kamińska

Senior Specialist

Tax Practice

T: +48 880 086 833

E: b.kaminska@kochanski.pl