





SAT's requests for the 2022 Transfer Pricing Studies have begun

As is customary every year, after the uploading of the informational transfer pricing annex on March 31, the Tax Administration requests the studies that support the results presented in such informational tax return, usually in the months of July and August.

According to that established in article 65 of the Tax Update

Law Decree 10-2012, taxpayers must provide the documentation requested by the Tax Administration, within the term of twenty (20) business days from the date the request was received. Such obligation does not affect the Tax Administration's authority to request additional information that it deems necessary for exercising its duties.

This week, the Tax Administration began requesting the Transfer Pricing Studies for the period from January 01 to December 31, 2022 from taxpayers that selected the option “I have foreign related parties and I did perform transactions with them” in their Annual Income Tax Return (form 1411). Based on the above, the following information is being requested:

-  Transfer Pricing Study (in PDF-text format).
-  Financial statements of the comparable companies, tables, and annexes that are incorporated into the information mentioned above (in Excel format).
-  Financial Statements (of the tested company), Balance Sheet, Statement of Income, Cash Flow, Statement of Equity (in Excel format).
-  Segmented financial information (information on the different types of products and services that the company makes or provides and the different geographical areas in which it operates), for the taxpayers that use segmented information in the transfer pricing analysis (in Excel format).

In previous years, taxpayers submitted the Transfer Pricing Study in person, on a non-rewritable CD, at the Tax Administration’s offices. However, for this year, SAT has implemented the submission of the Transfer Pricing Study through SAT’s online branch. This is a major step forward in taxpayers’ filing processes, as well as a great advancement in the performance of reviews by SAT, since having all the information in a consolidated database will allow it to detect inconsistencies, begin audits, and, consequently, make any transfer pricing adjustments, in less time.

Finally, the Tax Administration issued a document called “Instructions for the uploading of the Transfer Pricing Study and annexes,” so that this requirement can be fulfilled using SAT’s online branch. Among the most important aspects included in these instructions are: how to upload the documents in PDF format, Excel formats, the name each file should have, the instruction that files cannot exceed 10MB in size, and how to generate the certification that the Transfer Pricing Study was submitted.

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