

New tax opinion on amount of related party loan for current year (1/50/19)

We have written about the burning question of how to calculate the value of a related-party loan for the current year. This is crucial in determining whether the taxpayer is required to prepare and submit transfer pricing (TP) documentation to the State Revenue Service (SRS) within 12 months after the end of the financial year. As the deadline for 2018 is almost upon us (31 December 2019), PwC approached the Ministry of Finance and the SRS for comment. This article explores the opinion shared by the two bodies and PwC's understanding of their comment.

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