

Transfer Pricing Rules Country Summary

Country (Europe)	Information to internal performance relationships within duty of general information and duty disclosure (quantitative information)	Specific documentation	Time limit for documentation	Penalties (in case of set-off an/ or missing or inadequate documentation)
Argentina	yes	yes	-	in case of set-off
Australia	yes	yes	practical time limit	yes
Austria	yes	recommended	-	-
Belgium	-	yes	practical time limit	in case of set-off
Brazil	yes	yes	30 days	in case of set-off
Canada	yes	yes	90 days	yes
China	yes	yes	60 days	yes
Czech Republic	-	recommended	30 days	in case of set-off
Denmark	yes	recommended	-	in case of set-off
Finland	yes	recommended	-	in case of set-off
France	-	yes	60-90 days	yes
Germany	yes	yes	30-60 days	yes
Greece	-	recommended	-	in case of set-off
India	yes	yes	30 days	yes
Italy	-	recommended	practical time limit	in case of set-off
Japan	yes	recommended	practical time limit	-
Korea	yes	yes	practical time limit	yes
Luxembourg	-	recommended	-	-
Malaysia	yes	yes	-	in case of set-off
Mexico	yes	yes	6-16 days	yes
New Zealand	-	yes	practical time limit	in case of set-off
Netherlands	-	yes	practical time limit	yes
Norway	yes	recommended	-	in case of set-off
Poland	yes	yes	1 week	yes
Portugal	yes	yes	practical time limit	yes
Romania	-	yes	with examination	in case of set-off
Singapore	yes	recommended	-	in case of set-off
South Africa	yes	yes	3 weeks	in case of set-off
Spain	-	yes	practical time limit	-
Sweden	transfer pricing rules in preparation	recommended	-	in case of set-off
Swiss	-	-	-	-
Taiwan	-	yes	-	in case of set-off
Thailand	-	yes	1 week	in case of set-off
United Kingdom	yes	yes	30 days	yes
USA	yes	yes	with tax declaration	yes