

Transfer Pricing in Romania



Transfer pricing requirements were enforced in Romania in early 2008, when Order no. 222/2008 of the President of the National Tax Agency regarding the content of the transfer pricing file was published. As a result, transfer pricing audits are becoming more aggressive and it is doubly important that every aspect of companies' transfer pricing strategy is carefully and contemporaneously documented.

In accordance with the Romanian legal provisions on transfer pricing, any type of transaction between associated enterprises must be documented, including: management services, financial services, acquisitions / sales of goods, royalty payments, leasing, cost sharing agreements and any other types of transactions.

If transfer prices are not set at arm's length, the Romanian tax authorities have the right to adjust, for tax purposes, the company's fiscal result derived from transactions with related parties, in order to reflect the market value. Additional profit tax liabilities and penalties may be assessed.

How can we help you?...

Working in close cooperation with our colleagues from other Mazars offices, we gained a broad and deep knowledge of the solutions that have proved successful with clients across various industries, and insights into the specificities of the approaches adopted by tax authorities.

Our team

- Strong dedicated network of international transfer pricing specialists
- Broad knowledge of business and economic environment
- Excellent technical skills and customised hands-on approach
- Flexible solutions for our clients, adapted to their specific business and operational model
- Effective, high value-added results

Our expertise

- Preparation of transfer pricing documentation for major companies
- Assistance during tax inspections, regarding transfer pricing issues
- Transfer pricing trainings for our clients
- Access to databases developed by BUREAU Van Dijk (AMADEUS)
- Close cooperation with the most experienced Mazars offices in the transfer pricing field

Our assistance

- General information about Romanian transfer pricing regulation
- Preparation / Review of transfer pricing documentation
- Assessing tax risks of transfer prices: transfer pricing diagnosis
- Assistance during tax inspections with regards to transfer pricing aspects
- Advance pricing arrangements
- Customised trainings

Our team

Our core transfer pricing team includes highly trained consultants, ensuring that we can provide truly customised transfer pricing solutions. Our professionals combine the technical skills of tax, economics and business management, with a view to helping our clients to document their transfer pricing mechanisms and mitigate transfer pricing risks.

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