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Transfer  
pricing  
services\*  
in Vietnam



# Transfer pricing services in Vietnam



Cross border intercompany transactions are growing rapidly and becoming much more complex. Compliance with the different requirements of multiple tax jurisdictions is a costly and time consuming task. At the same time, Tax Authorities from around the world are imposing stricter penalties, more stringent documentation requirements, increasingly exchanging information and enforcing compliance by examining transfer prices.

## Transfer pricing – areas of focus

- Low margins over the years
- Losses over the years
- Different transfer prices over the years
- Fluctuation in margins over the years
- Losses in some years or in some divisions
- Cost sharing arrangements
- Group restructuring
- Permanent establishment (“PE”) issue
- Production capacity management
- Royalty / management fees payments

## Transfer pricing services

- Transfer pricing risks and opportunities review.
- Transfer pricing strategy development / planning.
- Transfer pricing documentation.
- Transfer pricing audit defence.
- Dispute resolution - Mutual Agreement Procedure (“MAP”)

## Transfer pricing rules

Circular 117/2005/TT-BTC (“Circular 117”) was the first transfer pricing regulation which became effective from 1 January 2006.

Circular 117 requires taxpayers to submit the declaration form (“Form GCN-01/TNTD”) within 90 days after the year end together with the Corporate Income Tax (“CIT”) final return.

Circular 117 also requires taxpayers to prepare contemporaneous transfer pricing documentation which needs to be submitted to the tax authorities within 30 working days from date of request.

**For more information on our services in Vietnam, please contact:**

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