

# Flash Report

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## ***TP legislation: clarification issued***



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## ***The State Fiscal Service of Ukraine has expanded its interpretation of transfer pricing legislation***

On 14 April 2016, the State Fiscal Service of Ukraine issued an order that provides a clarification and expands interpretation of various statutes on Transfer Pricing (TP).

There are now 16 responses to commonly raised questions.

These include: determination of amount of controlled transactions with residents of low-tax jurisdictions; consideration of credit-notes; doing business with companies located in Crimea; transactions with permanent establishments of non-residents and other issues.

The link to this general tax clarification is included below<sup>1</sup>.

<sup>1</sup> <http://sfs.gov.ua/diyalnist-/transfertne-tsinoutvorenny/listi-rozysnennya/67805.html>