

# TRANSFER PRICING DOCUMENTATION REQUIREMENTS 2025/26

	Company Size Threshold	Documentation Threshold requiring local file	Dedicated annual tax return for TP reporting	MCAA signed for automatic exchange of CbCR
Austria	No	<b>Mandatory</b> when turnover > EUR 50M in two preceding Fys	No	Yes
Bosnia	No	None	Yes, if the total annual value of controlled transactions exceeds KM 500,000	No
Bulgaria	<p><b>Yes</b>, exemption when in the preceding year, two of the below values are not exceeded:</p> <ul style="list-style-type: none"> <li>- Balance sheet total - BGN 38M</li> <li>- Net sales revenue - BGN 76M</li> <li>- Average number of employees - 250</li> </ul> <p><b>Exemption</b> when a taxpayer is exempt from CIT and is subject to an alternative tax</p> <p><b>Exemption</b> when transactions are executed <b>only in Bulgaria</b></p>	<p><b>Mandatory</b> when:</p> <ol style="list-style-type: none"> <li>1. Company size thresholds in the first column are met</li> <li>2. The value of transaction exceeds: <ul style="list-style-type: none"> <li>- BGN 400,000 - for sales</li> <li>- BGN 1M - for loans</li> <li>- BGN 200,000 - for other</li> </ul> </li> <li>3. Transaction is executed in Bulgaria and one other jurisdiction</li> <li>4. Taxpayer exempt from CIT or subject to alternative tax executes activities subject to CIT</li> </ol>	No	Yes
China	No	<p><b>Mandatory</b> when the annual value of transaction exceeds:</p> <ol style="list-style-type: none"> <li>1. RMB 200M for transfer of tangible assets</li> <li>2. RMB 100M for transfer of financial assets</li> <li>3. RMB 100M for transfer of intangible assets</li> <li>4. RMB 400M for other transactions</li> </ol>	Yes, the Annual related party transaction form	Yes
Croatia	No	None	No, but connected to PD-IPO form submitted together with the tax return	Yes

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Czech Republic	No	No, no legal obligation for TP documentation	No, but there is an annex to the regular CIT return	Yes
Denmark	<p><b>Yes</b>, exemption from TP obligation for local residents and affiliates if:</p> <ol style="list-style-type: none"> <li>1. Employees on a consolidated basis &lt; 250 and</li> <li>2. Annual Balance Sheet Total &lt; DKK 125M</li> <li>3. Annual turnover &lt; DKK 250M</li> </ol> <p>Smaller companies are <b>exempt</b> but still TP principles apply</p> <p><b>Exemption</b> not applicable to transactions with non EU/EEA members or countries without double tax treaty with Denmark.</p>	None	Yes, all companies must submit form 05.022 along with the tax return	Yes
France	<p><b>Yes</b>, TP documentation is mandatory for:</p> <ol style="list-style-type: none"> <li>1. Companies with sales or total gross assets &gt; EUR 150M and</li> <li>2. Companies controlling or being controlled by entities with sales or total gross assets &gt; EUR 150M</li> </ol> <p>Smaller companies are generally <b>exempt</b></p>	<b>Mandatory</b> for large companies (first column) when the annual value of transaction per nature > EUR 100,000	<p><b>Yes</b></p> <ol style="list-style-type: none"> <li>1. Companies with sales or total gross assets &gt; EUR 50M has to report transactions per nature with value of &gt; EUR 100,000</li> <li>2. French companies must submit report per country when consolidated sales &gt; EUR 750M</li> </ol>	Yes

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Germany	<b>Yes</b> , smaller companies are exempt, but have to keep records of intra-group transactions	Smaller companies are <b>exempt</b> when: 1. Total remuneration for both provision and receiving of goods to/from foreign related parties ≤ EUR 6M 2. Total remuneration for both provision and receiving of services to/from foreign related parties ≤ EUR 600,000	<b>No</b>	<b>Yes</b>
Greece	<b>Yes</b> , the scale of taxpayer's operations	<b>Exemption</b> when: 1. Transaction value cumulatively ≤ EUR 100,000 and yearly turnover ≤ EUR 5M 2. Transaction value cumulatively ≤ EUR 200,000 and yearly turnover > EUR 5M	<b>Yes</b>	<b>Yes</b>
Hungary	<b>No</b>	<b>Mandatory</b> when the annual value of transaction ≥ HUF 100M	<b>Yes</b> , but is a part of the CIT return	<b>Yes</b>
Italy	<b>Yes</b> , small and medium-sized enterprises with turnover < EUR 50M are exempt from updating the benchmarking analysis under additional conditions	<b>None</b>	<b>Yes</b> , RS106 section in the annual fiscal declaration	<b>Yes</b>
Malta	<b>Yes</b> , TP obligations do not apply when in the preceding year: 1. Aggregated value of cross-border arrangements income and expenditure ≤ EUR 6M and 2. Aggregated value of income and expenditure of capital nature forming cross-border arrangements ≤ EUR 20M	<b>None</b> , besides those in the first column	<b>No</b>	<b>Yes</b>

	Company Size Threshold	Documentation Threshold requiring local file	Dedicated annual tax return for TP reporting	MCAA signed for automatic exchange of CbCR
Montenegro	<p><b>Yes</b>, large taxpayers - prepare and submit a TP documentation</p> <p>Other - prepare and posses a TP documentation</p>	<p><b>Mandatory</b> when the annual value of transaction &gt; EUR 75,000</p> <p>Simplified format of Local File if the value of transaction ≤ EUR 75,000 (except for loans)</p>	<b>No</b> , but large taxpayers submit TP documentation with tax return	<b>Yes</b>
North Macedonia	<b>No</b> , however exemption from transfer pricing analysis applies when the value of transaction with one related party ≤ MKD 300M	<b>None</b>	<b>Yes</b> , Transfer Pricing Report	<b>No</b>
Poland	<b>Yes</b> , generally transaction value thresholds apply, however regardless the value of transaction, once requested by the tax authorities, taxpayers other than micro-entrepreneurs have to prepare and submit a Local File	<p><b>Mandatory</b> when the annual value of:</p> <ol style="list-style-type: none"> <li>1. Commodity transaction &gt; PLN 10M</li> <li>2. Financial transaction &gt; PLN 10M</li> <li>3. Service transaction &gt; PLN 2M</li> <li>4. Other transaction &gt; PLN 2M</li> <li>5. Financial transaction with tax haven &gt; PLN 2.5M</li> <li>6. Non-financial with tax haven &gt; PLN 500,000</li> </ol>	<b>Yes</b> , TPR form	<b>Yes</b>
Portugal	<p><b>Yes</b>, large taxpayers which annual revenues ≥ EUR 10M are <b>obligated</b> to maintain TP documentation.</p> <p>SMEs which annual revenues &lt; EUR 10M are exempt, unless conducting transactions with blacklisted jurisdictions.</p>	<p><b>Mandatory</b> for large taxpayers (the first column) when the annual value of transaction:</p> <ul style="list-style-type: none"> <li>&gt; EUR 100,00 per counterparty</li> <li>&gt; EUR 500,000 globally</li> </ul> <p>Mandatory for all transactions with blacklisted jurisdictions - regardless the amount.</p>	<b>Yes</b> , Annex H of IES (annual tax and financial report)	<b>Yes</b>

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Romania	<p><b>Yes</b>, as a general rule, large taxpayers are obliged to prepare a TP documentation</p> <p>Small companies are exempt</p>	<p><b>Mandatory</b> for large taxpayers when the value of:</p> <ol style="list-style-type: none"> <li>1. Cashed in/paid interest for financial services &gt; EUR 200,000</li> <li>2. Services rendered/received &gt; EUR 250,000</li> <li>3. Acquisitions/sales of tangible/intangible assets &gt; EUR 350,000</li> </ol> <p>Large taxpayers (other than above) and medium or small companies - <b>only upon request</b> if:</p> <ol style="list-style-type: none"> <li>1. Cashed in/paid interest for financial services &gt; EUR 50,000</li> <li>2. Services rendered/received &gt; EUR 50,000</li> <li>3. Acquisitions/sales of tangible/intangible assets &gt; EUR 100,000</li> </ol> <p><b>Exemption</b> applies when the abovementioned threshold are not exceeded</p>	No	Yes
Serbia	<b>No</b> , however exemption from transfer pricing analysis if the value of transaction ≤ RSD 8M	None	<b>No</b> , Transfer Pricing Study has to be submitted together with CIT return	No
Slovenia	<b>No</b> , however smaller and non-repetitive transactions may be excluded from transfer pricing analysis	None	<b>No</b> , Transfer Pricing Study has to be submitted together with CIT return	Yes

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Spain	<b>Yes</b> , there are measures of simplification for medium (yearly income ≤ EUR 45M) and small taxpayers (yearl income ≤ EUR 10M)	<b>Exemption</b> when: 1. The value of transaction < EUR 250,000 or 2. A tax consolidated regime is applied	<b>Yes</b> , Form 232	<b>Yes</b>
Sweden	<b>No</b>	<b>Exemption</b> when in the preceding year, the Group's level of: 1. Employees ≤ 250 and 2. Turnover ≤ SEK 450M or 3. Balance sheet total ≤ SEK 400M	<b>No</b>	<b>Yes</b>
Switzerland	<b>No</b>	<b>Exemption</b> for parent companies of international groups in Switzerland if the annual turnover > CHF 900M	<b>No</b> , however TP documentation has to be submitted together with tax return	<b>Yes</b>
Turkey	<b>No</b>	<b>None</b>	<b>No</b>	<b>Yes</b>
UK	<b>Yes</b> , the scale of taxpayer's operations	<p><b>Exemption</b> for small companies with employees &lt; 50 and turnover or assets &lt; EUR 10M.</p> <p>Medium-sized companies with employees &lt; 250 and turnover &lt; EUR 50M or assets &lt; EUR 43M <b>must have only intra-group agreements and a TP policy memo.</b></p> <p><b>Mandatory</b> for large enterprises with: 1. employees &gt; 250 or &lt; 250 but meeting both the 2. turnover ≥ EUR 50M and 3. assets ≥ EUR 43M <b>must prepare a Local File and a Summary Audit Trail.</b></p>	<b>Yes</b> , Summary Audit Trail for large enterprises	<b>Yes</b>