

# TRANSFER PRICING

Transfer Pricing issues arise in transactions between entities classified as “related parties” under the Vietnamese Transfer Pricing regulations. This subject matter has continuously been the focal point during Tax audits/inspections in Vietnam and results in a numerous amount of penalties for non-compliance that may harm not only the profitability but also the tax reputation of the Group/Company as a whole.

At Grant Thornton Vietnam, we assist our valued clients in an expanded scope of services, from meeting the Vietnamese compliance requirements to proactively planning your business, aiming to achieve both operational and tax supply chain efficiencies.

## APPROACH & SERVICES

### YOUR BUSINESS

Market entry

Plan your business

Compliance

Wind-up disposals

### GRANT THORNTON'S SOLUTIONS

#### Service 1

##### ADVISORY

- Acknowledge the current Transfer Pricing environment and impact on business
- Provide professional advice on the prospective transactions with related parties and Transfer Pricing positions

#### Service 2

##### PLANNING AND REVIEW

- Plan the appropriate approach and testing method for the transactions between related parties
- Review the Transfer Pricing materials that have been prepared from the Vietnamese Transfer Pricing perspective

#### Service 3

##### COMPLIANCE ASSISTANCE

- Assist in preparation of the compliant documents in accordance with the Vietnamese Transfer Pricing legal framework
- Document the explanations for loss and/or low profitability based on the provided information

#### Service 4

##### AUDIT ASSISTANCE

- Assign a team of professionals to assist with Transfer Pricing audits
- Provide proper responses to defend the Transfer Pricing position against the queries/ challenges from tax authorities

### TIMELINE

1-3 weeks

2-4 weeks

4-6 weeks

1-2 weeks

### DELIVERABLE

Our advisory memo containing key findings, potential risks, and recommendations for future improvement

Our review memo, providing professional advice to meet the Vietnamese legal requirements

- Annual Transfer Pricing Disclosure Form
- Transfer Pricing Documentation report
- Transfer Pricing Master File
- Advance Pricing Agreement

Suggestions for negotiation with the local tax authority

## SERVICE ENGAGEMENT TEAM



## CONTACT

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