

Transfer Pricing Country Profile
(to be posted on the OECD Internet site www.oecd.org/ctp/tp/countryprofiles)

Name of Country: UNITED KINGDOM Date of profile: September 2012

1. Reference to the Arm's Length Principle

Section 147 Taxation (International and Other Provisions) Act 2010

2. Reference to the OECD Transfer Pricing Guidelines (if any)

Section 164 Taxation (International and Other Provisions) Act 2010

3. Definition of related parties

Section 148 Taxation (International and Other Provisions) Act 2010

4. Transfer pricing methods

None

5. Transfer pricing documentation requirements

No specific transfer pricing documentation requirements, Paragraph 21 Schedule 18 Finance Act 1998 requires such records to enable delivery of correct and complete return.

6. Specific transfer pricing audit procedures and / or specific transfer pricing penalties

No specific regulations on Audit procedures and/or transfer pricing penalties – normal CT provisions in Schedule 18 Finance Act 1998 apply.

7. Relevant regulations on Advance Pricing Arrangements

Sections 218-230 Taxation (International and Other Provisions) Act 2010.
Statement of Practice 2/10: <http://www.hmrc.gov.uk/agents/sop.pdf> (page 315)

8. Link to relevant Government Internet sites

Her Majesty's Revenue and Customs: <http://www.hmrc.gov.uk>

9. Other relevant information

N/a

Note

1. Relevant provisions of domestic legislation referring to the Arm's Length Principle.
2. Reference if any to the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations in domestic legislation or regulations.
3. Relevant legislation or regulations containing a definition of related parties or associated enterprises.
4. Relevant legislation or regulations containing guidance on transfer pricing methods including hierarchy among them if any.
5. Relevant regulations if any in relation to transfer pricing documentation requirements.
6. Relevant regulations if any on specific transfer pricing audit procedures and / or specific transfer pricing penalties.
7. Relevant regulations if any on Advance Pricing Arrangements.
8. Addresses of the Internet sites of the relevant authorities in charge of transfer pricing policy, its administration and Advance Pricing Arrangements.
9. Other relevant information, for instance having gone through a peer review, or having new transfer pricing regulations in preparation.