

## Transfer Pricing Country Profile

**Name of Country:** FINLAND

**Date of profile:** February 2009

No.	Item	Reference to and wherever possible text of the provisions; Wherever needed and possible, a translation into one of the OECD official languages would be welcome
1	<b>Reference to the Arm's Length Principle</b>	Act on Assessment Procedure § 31
2	<b>Reference to the OECD Transfer Pricing Guidelines (if any)</b>	No reference in the legislation.  However, OECD TPG have been referred in the Government Bill (107/2006 vp.) introducing the transfer pricing documentation requirements.
3	<b>Definition of related parties</b>	Act on Assessment Procedure § 31
4	<b>Transfer pricing methods</b>	No relevant legislation.  However, TP methods have been referred in the Government Bill (107/2006 vp.). The TP methods are applied in line with OECD TPG including the hierarchy of the methods.
5	<b>Transfer pricing documentation requirements</b>	Act on Assessment Procedure § 14a-14c, with effect from 1 January 2007.  The National Board of Taxes has provided guidance on TP documentation requirements (1471/37/2007)
6	<b>Specific transfer pricing audit procedures and / or specific transfer pricing penalties.</b>	Act on Assessment Procedure § 32 on penalties.  For noncompliance of documentation requirements, the tax authorities may impose penalty of an amount not exceeding €25,000. Documentation-related penalty may be imposed even if there is not any need for transfer pricing adjustment.
7	<b>Relevant regulations on Advance Pricing Arrangements</b>	For unilateral APAs: Act on Assessment Procedure §§ 84 and 85
8	<b>Link to relevant Government Internet sites</b>	<a href="http://www.vm.fi">www.vm.fi</a> (the Ministry of Finance) <a href="http://www.vero.fi">www.vero.fi</a> (the Tax Administration)
9	<b>Other relevant information</b>	The National Board of Taxes has published a tax return form of transfer pricing, tax year 2009.

## **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.