

10 June 2020

Global Tax Alert

News from Transfer Pricing

Argentina further extends due dates for transfer pricing filings

EY Tax News Update: Global Edition

EY's Tax News Update: Global Edition is a free, personalized email subscription service that allows you to receive EY Global Tax Alerts, newsletters, events, and thought leadership published across all areas of tax. Access more information about the tool and registration [here](#).

Also available is our [EY Global Tax Alert Library](#) on ey.com.

On 5 June 2020, the Argentine Federal Tax Authorities (AFIP - *Administración Federal de Ingresos Públicos*) published, in the *Official Gazette*, General Resolution No. 4733 (GR 4733), which extends for one month the due dates for transfer pricing (TP) filings established in GR 4717 for tax years ending December 2018 to May 2019. The other due dates established in GR 4717 remain unchanged. For more information on GR 4717, see EY Global Tax Alert, [Argentina issues long-awaited transfer pricing regulations](#), dated 28 May 2020.

Background

On 15 May 2020, AFIP published GR 4717, containing the long-awaited regulations implementing the TP provisions enacted as part of the tax reform in December 2017. These rules mainly cover the TP compliance obligations for tax years ended December 2018 and onwards (including due dates and the creation of new returns). Those compliance obligations include the filing of the TP report (local file) and master file. Additionally, the regulations introduce definitions and requirements that affect existing and future intercompany transactions involving Argentine companies. Multinational companies doing business in Argentina should review the new regulations and assess their intercompany transactions.

Compliance obligations and new due dates

The TP report and master file were originally due beginning the week of 18 May 2020. GR 4717 extended the due date for Form 2668, the TP report and the master file for tax years ending December 2018 to April 2020. Under GR 4717, the due date for filings for tax years ending December 2018 to May 2019 was from 10 June to 14 June 2020. GR 4733 further extends the filing due date for those tax years to 10 July through 14 July 2020.

Additional information

According to GR 4733, AFIP changed the filing due date because:

- ▶ It would be difficult for taxpayers to collect certain information from abroad and comply with tax obligations by the due date originally set, due to the COVID-19 pandemic.
- ▶ The AFIP web service for submitting the TP filings is not yet operational.

Implications

Companies should carefully assess the obligations with which they must comply and consider implementing alternative processes for intercompany transactions in light of the new definitions and specific criteria established for different issues. Failure to comply with this new legislation may result in penalties and increase the probability of being audited by the tax authorities.

The new TP rules could have significant implications for companies doing business in Argentina. Companies may have to perform a detailed analysis of financial operations, service provisions and transactions involving intangibles or intermediaries, among others.

For additional information with respect to this Alert, please contact the following:

Pistrelli, Henry Martin & Asociados S.R.L., Buenos Aires

- ▶ Carlos Casanovas carlos.casanovas@ar.ey.com
- ▶ Gustavo Scravaglieri gustavo.scravaglieri@ar.ey.com
- ▶ Milton González Malla milton.gonzalez-malla@ar.ey.com
- ▶ Esteban Kacanas esteban.kacanas@ar.ey.com
- ▶ Manuel Val Lema manuel.vallema@ar.ey.com
- ▶ Mariano Rodríguez Morán mariano.rodriguez-moran@ar.ey.com
- ▶ Pablo Godoy pablo.godoy@ar.ey.com
- ▶ Leandro Navatta leandro.navatta@ar.ey.com
- ▶ María Florencia Panichella maria-florencia.panichella@ar.ey.com
- ▶ Hernán Ubertazzi hernan.ubertazzi@ar.ey.com
- ▶ Ángeles Crespi angeles.crespi@ar.ey.com
- ▶ Alan Schuckman pablo.schuckman@ar.ey.com
- ▶ Marcelo Damián Gros marcelo.gros@ar.ey.com
- ▶ Patricio Castells patricio.castells1@ar.ey.com

Ernst & Young LLP (United States), Latin American Business Center, New York

- ▶ Pablo Wejcmán pablo.wejcmán@ey.com
- ▶ Juan Ignacio Pernin juan.ignacio.pernin@ey.com
- ▶ Ana Mingramm ana.mingramm@ey.com
- ▶ Enrique Pérez Grovas enrique.perezgrovas@ey.com

Ernst & Young LLP (United Kingdom), Latin American Business Center, London

- ▶ Pablo Baroffio pablo.baroffio@uk.ey.com
- ▶ Lourdes Libreros lourdes.libreros@uk.ey.com

Ernst & Young Abogados, Latin American Business Center, Madrid

- ▶ Jaime Vargas jaime.vargas.c@es.ey.com

Ernst & Young Tax Co., Latin American Business Center, Japan & Asia Pacific

- ▶ Raul Moreno, *Tokyo* raul.moreno@jp.ey.com
- ▶ Luis Coronado, *Singapore* luis.coronado@sg.ey.com

About EY

EY is a global leader in assurance, tax, transaction and advisory services. The insights and quality services we deliver help build trust and confidence in the capital markets and in economies the world over. We develop outstanding leaders who team to deliver on our promises to all of our stakeholders. In so doing, we play a critical role in building a better working world for our people, for our clients and for our communities.

EY refers to the global organization, and may refer to one or more, of the member firms of Ernst & Young Global Limited, each of which is a separate legal entity. Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients. For more information about our organization, please visit ey.com.

Transfer Pricing Group

© 2020 EYGM Limited.
All Rights Reserved.

EYG no. 003957-20GbI

1508-1600216 NY
ED None

This material has been prepared for general informational purposes only and is not intended to be relied upon as accounting, tax, or other professional advice. Please refer to your advisors for specific advice.

ey.com