

GHANA REVENUE AUTHORITY



ANNUAL RETURN ON TRANSFER PRICING ARRANGEMENTS

YEAR OF ASSESSMENT.....

BASIS PERIOD

**GHANA REVENUE AUTHORITY
ANNUAL RETURN ON TRANSFER PRICING ARRANGEMENTS**

PART I - TAXPAYER INFORMATION

- a. Name of taxpayer
- b. Taxpayer Identification Number (TIN).....
- c. Postal Address
- d. Location Address (Include GPS No.)
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- e. E-mail Address
- f. Taxpayer's Telephone number.....
- g. Contact person:Cell Phone No.....
- h. Has there been any change in the ownership structure of your entity?
- Yes [], No [], Not Applicable []

If yes, provide details (attach schedule where necessary)

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PART II: INFORMATION ON ASSOCIATED PERSONS

- a) Provide the organogram of the group (if submitting for the first time or where there have been changes)
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- b) Particulars of associated persons with whom the taxpayer has conducted any form of arrangement or dealing during the year

Name of associated person	Principal Business Activity	Nature of relationship	Country of incorporation	Location /Residence	Description of Arrangements

c) Arrangements with Associated Persons

State the amount of expenditure/payments incurred by the taxpayer from arrangements with associated persons in the third column and the amount of income/receipts derived by the taxpayer with respect to arrangements with associated persons in the fourth column.

S/N	Item	Expenditure/Payments	Income/Receipts	Associated person
i.	Stock -in-trade and raw materials			
ii.	All other goods ⁱ			
iii.	Royalties related to Intellectual Properties			
iv.	Other Royalties			
v.	Rent / Lease Payment			
vi.	Other Intangibles			
vii.	Management and Administration			
viii.	Marketing			
ix.	Human Resource Development and Training			
x.	Technical Services			
xi.	Research and Development			
xii.	All other services ⁱⁱ			
xiii.	Interests			
xiv.	Discounts			
xv.	Commission			
xvi.	Insurance			
xvii.	Guarantee fees			
xviii.	Forex loss/gains			
xix.	Other Financial Services			
xx.	Reimbursements/Refunds ⁱⁱⁱ			
xxi.	Cost Sharing /Cost Contribution arrangement			
xxii.	Employment Cost			
xxiii.	All other incomes or expenditure not included elsewhere			
xxiv.	Total Value of Arrangements			

d) **Loans**

i. Loans and Guaranteed Loans with interest provided to the taxpayer by associated persons

Name of Associated person					
Opening balance					
Additions					
Repayments					
Exchange Differences					
Closing balance					
Interest Rate					

ii. Loans and Guaranteed Loans with **no** interest provided to the taxpayer by associated persons

Name of Associated person					
Opening balance					
Additions					
Repayments					
Exchange Differences					
Closing balance					

iii. Loans and Guaranteed Loans with/without interest provided by the taxpayer to associated persons

Name of Associated person					
Opening balance					
Additions					
Repayments					
Exchange Differences					
Closing balance					
Interest Rate					

e) List the entities in which the taxpayer had either a direct or indirect interest within the basis period.

Name of Entity	Residence of Entity	Nature of Interest

f) **Non-monetary arrangement with Associated person**

Have you received from or provided to an associated person, any non-monetary consideration for the performance of services, transfer of property (tangible or intangible), processes, rights or obligations during the basis period?

Yes

No

If yes, provide details (attach schedule, if necessary)

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Have you provided to an associated person any services, transfer of property (tangible or intangible), processes, rights or obligations for which the consideration was nil during the basis period?

Yes

No

If yes, provide details (attach schedule if necessary)

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g) **Acquisition/Disposal of Assets**

i) Did you have any arrangements of a capital nature with associated persons in which you acquired interest in asset(s)?

Yes

No

If yes, state the transfer pricing method(s) used.

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ii) Did you have any arrangements of a capital nature with associated persons in which you disposed of asset(s)?

Yes

No

If yes, state the transfer pricing method(s) used.

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h) Participation by resident person

Did a resident person with whom you are in a controlled relationship participate directly or indirectly in your capital, finance, management or control during the basis period?

Yes

No

If yes, provide details. (Attach schedules, if necessary).

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i) Participation by non-resident person

Did a non-resident person with whom you are in a controlled relationship participate directly or indirectly in your capital, finance, management or control during the basis period?

Yes

No

If yes, provide details. (Attach schedules, if necessary).

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j) Business Restructuring

i) Were you involved in any Business Restructuring arrangement in which you transferred functions, rights, interests, assets and/or risks?

Yes

No

If yes, state the amount of compensation received.

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ii) Were you involved in any Business Restructuring arrangement in which functions, rights, interests, assets and/or risks were transferred to you?

Yes

No

If yes, state the amount of compensation paid.

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k) Simplified Approach

i) Were you involved in any arrangement which can be considered under the Simplified Approach in Regulation 14 of L.I. 2412?

Yes

No

If yes, provide details in the table below:

Name of associated person	Nature of Relationship	Description of Arrangement	Value of the Arrangement	Type of Simplified Approach Applied (Monetary Value Exemption, Low Value Added Intra-Group Services or Technology Transfer Arrangement)

ii) Have you filed a Notice of election to apply the Simplified Approach?

Yes

No

iii) Have you received approval from the Commissioner-General to apply the Simplified Approach?

Yes

No

Not Applicable

If yes, attach a copy of the letter of approval.

PART III. TRANSFER PRICING METHODS AND TESTING FOR ARM'S LENGTH STANDARD

The L. I. 2412 sets out five methods for calculating arm's length considerations for controlled arrangements. Please state and place against each of the methods, the total value of arrangements where that method was employed in determining the price for the controlled arrangement. The "Total Arrangements" value below must be equal to the value for "Total Value of Arrangements" in part II (c).

Transfer Pricing Method	Nature of Controlled Arrangement ^v	Amount Supplied by Associated Persons	Amount Supplied to Associated Persons	Transfer Pricing Adjustments (if any)
Comparable Uncontrolled Price Method (CUP)				
Resale Price Method (RPM)				
Cost Plus Method (CPM)				
Transactional Profit Split Method				
Transaction Net Margin Method (TNMM)				
Simplified Approach				
Any method other than the above ^v				
Total Arrangements				

PART IV. Consolidated Financial Statement

- a) Attach the Financial Statement of the company for the basis period.
- b) Consolidated Group Revenue

Consolidated Group Revenue	Currency ^{vi}
l) Total Revenue of Associated Persons in Ghana	
m) Total Revenue of Associated Persons Outside Ghana	
n) Total Consolidated Group Revenue (C) = (a) + (b)	

PART V. DETAILS OF DIRECTORS.

Director I

Name:

Telephone Number: E-mail:

Tax Identification Number: Equity Shareholding (%):

Director II

Name:

Telephone Number: E-mail:

Tax Identification Number: Equity Shareholding (%):

PART VI. AUTHORIZED OFFICER

Name: Designation:

E-mail: Telephone No.:

Date: Signature:

REFERENCE NOTES

ⁱ All other goods other than stock in trade or raw material purchased/supplied from/to persons in controlled relationship.

ⁱⁱ All other services other than those stated elsewhere.

ⁱⁱⁱ Reimbursements include refunds, recharges or payments/receipts made to/from persons in controlled relationship.

^{iv} Purchase/Sale of goods, Provision of services, Royalties, Management services, Technical services, Marketing Services, Insurance etc. Create sub-rows within a row where a particular transfer pricing method was used to test more than one arrangement.

^v Any other method used requires prior approval of the Commissioner-General.

^{vi} Persons permitted to file returns in foreign currency should complete this form in that currency. Provide the exchange rates used to convert foreign currencies into the local currency.