



TPC Group
NEWSLETTER
SEPTEMBER - II



News from Mexico

MEXICO STRENGTHENS FISCAL CONTROL: SAT RECOVERS MILLIONS FROM LARGE CORPORATIONS

Mexico's Tax Administration Service (SAT) has intensified its scrutiny of large national and multinational corporations, especially in transfer pricing, reviewing complex structures to ensure that financial reports reflect market values. Between 2019 and 2024, it recovered 106.178 billion pesos, an increase of 367% compared to the 2013-2018 period.



News from Brazil

BRAZIL UPDATES THE PRL METHOD IN TRANSFER PRICING

Brazil launches Edital PGFN/RFB No. 53 (August 14, 2025) as part of the Comprehensive Transaction Program to resolve tax disputes related to the "Resale Price Less Profit" (PRL) method. It offers discounts of up to 65%, installment payments, and the possibility of offsetting debts with tax credits. Deadline for enrollment: November 28, 2025.



News from Spain

CASH POOLING AND TRANSFER PRICING IN SPAIN: KEY DOCTRINE OF THE SUPREME COURT

The Spanish Supreme Court establishes doctrine on how to value cash pooling transactions between related companies, requiring that interest rates reflect arm's length conditions. Methods such as CUP, TNMM, Cost Plus, and RPM must be used on a case-by-case basis, evaluating functions, risks, and market conditions to avoid tax adjustments.



TPC GROUP: TRANSFER PRICING CONSULTING FIRM
NOMINATED BY ITR AMERICAS TAX AWARDS IN 2025 IN
SEVERAL CATEGORIES AND JURISDICTIONS

News from Malaysia



MALAYSIA: KEYS TO MAXIMIZING TAX AND INVESTMENT INCENTIVES FOR FOREIGNERS

Malaysia strengthens its appeal to foreign investment with tax incentives such as "Pioneer Status," capital investment deductions, intellectual property exemptions, special zones, and double taxation treaties. Transfer pricing rules (TP Rules 2023 / Guidelines 2024) require solid documentation and that transactions reflect market conditions to avoid penalties.

News from Egypt



THE EVOLUTION OF TRANSFER PRICING IN THE DIGITAL ECONOMY IN EGYPT

In Egypt, digitization has increased the prominence of intangibles (software, algorithms, data) that challenge traditional transfer pricing valuation methods. Tax laws have been updated with guidelines in 2023 for greater clarity on deadlines, late payment interest, and documentation requirements. Updated documentation and adapted methodologies are recommended.

News from Italy



ITALY: VAT TREATMENT IN TRANSFER PRICING ADJUSTMENTS

The Italian Revenue Agency clarifies (consultation no. 214, August 20, 2025) that transfer pricing adjustments only affect VAT if they are onerous, are linked to transactions already taxed, and have a contract or document proving their direct relationship. Failure to meet these conditions means that the adjustment is accounted for without VAT effects.

Do you require support with Transfer Pricing?

At TPC Group, we have highly trained staff who can advise and support you.

If you need assistance, please contact us via our corporate email address.



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