

Transfer Pricing Compliance Checklist



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As per Income Tax Act, 1961 & Rules 10D, 10DA, 10DB - Relevant for AY 2025-26 (for FY 2024-25)

A. For All International and Specified Domestic Transactions

- ☐ Identify Associated Enterprises (AEs) as defined under **Section 92A**.
- ☐ Identify all International Transactions and Specified Domestic Transactions as per **Sections 92B** and **92BA**, respectively.
- ☐ Conduct Functional, Asset, and Risk (FAR) Analysis as required under **Rule 10D**.
- ☐ Benchmark transactions using Arm's Length Price (ALP) methods as prescribed under **Rule 10B**.
- ☐ Maintain Transfer Pricing Documentation for international transactions, if the **aggregate value of all international transactions with all AEs exceeds INR 1 crore** in the financial year (**Rule 10D**).
- ☐ Maintain Transfer Pricing Documentation for Specified Domestic Transactions, if the **aggregate value of all Specified Domestic Transactions exceeds INR 20 crores** in the financial year [i.e., transactions with entities that are claiming deductions under **Sections 80IA or 80IB**, tax holiday exemptions, or concessional tax rates under **Section 115BAB (Section 92BA, Rule 10D)**].
- ☐ File **Form 3CEB** (Accountant's Report) as required under **Section 92E**, mandatory for **any international transaction with an Associated Enterprise** (regardless of the INR 1 crore documentation threshold) or if the **aggregate value of Specified Domestic Transactions exceeds INR 20 crores**.
- ☐ Document compliance with **secondary adjustment requirements** under **Section 92CE**, if primary transfer pricing adjustments exceed **INR 1 crore**.

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B. Master File (Form 3CEAA + 3CEAB) – Rule 10DA

- ☐ Prepare and file **Form 3CEAA (Part A)** (Master File) if **international transactions are undertaken during the financial year** by the entity (**Rule 10DA**).
- ☐ Prepare and file **Form 3CEAA (Part B)** (Master File) if the **consolidated revenue of the international group exceeds INR 500 crores** in the financial year and either:
 - The **aggregate value of international transactions exceeds INR 50 crores**,
or
 - The **aggregate value of transactions relating to intangible property exceeds INR 10 crores** (**Rule 10DA**).
- ☐ File **Form 3CEAB** (Intimation of Designated Constituent Entity to file Master File) if the entity meets the above Master File thresholds and has more than one entity operating in India.

C. Country-by-Country Report (CbCR) – Rule 10DB

- ☐ File **Form 3CEAC** (Intimation by a Constituent Entity) by an Indian constituent entity of an international group with **consolidated group revenue exceeding INR 6,400 crores** (equivalent to Euro 750 million) in the financial year, if the Parent Entity/Alternate Reporting Entity (ARE) is filing the CbCR in its respective jurisdiction and there is an automatic exchange of CbCR activated between the Parent Entity/ARE's jurisdiction and India (**Rule 10DB**).
- ☐ File **Form 3CEAD** (Country-by-Country Report) by the **parent entity or designated alternate reporting entity** of an international group with **consolidated group revenue exceeding INR 6,400 crores** in the financial year, if the Indian entity is the only one required to file the CbCR as per **Form No. 3CEAD** (**Rule 10DB**).

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Key Filing Due Dates

- **Transfer Pricing Documentation (Local File):** On or before the 31st day of **October** of the relevant assessment year (i.e., 31 October 2025), or **one month prior to the due date for filing the return of income under Section 139 (Rule 10D).**
- **Form 3CEB (Accountant's Report):** On or before the 31st day of **October** of the relevant assessment year (i.e., 31 October 2025), or **one month prior to the due date for filing the return of income under Section 139 (Section 92E).**
- **Form 3CEAA (Master File, Part A and Part B):** On or before the 30th day of **November** of the relevant assessment year (i.e., 30 November 2025), same as the due date for filing the return of income under **Section 139 (Rule 10DA).**
- **Form 3CEAB (Master File Intimation):** **At least 30 days prior to the due date for filing Form 3CEAA, i.e., on or before the 31st day of October** of the relevant assessment year (i.e., 31 October 2025) **(Rule 10DA).**
- **Form 3CEAC (CbCR Intimation):** **At least 10 months from the end of the group's accounting year, i.e., on or before the 31st day of October 2025** (if the group's accounting year ends on 31 December 2024) **(Rule 10DB).**
- **Form 3CEAD (CbCR):** **Within twelve months from the end of the reporting accounting year, i.e., on or before the 31st day of December 2025** (if the group's accounting year ends on 31 December 2024) **(Rule 10DB).**

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Penalties for non-compliance include:

- 2% of the value of International Transactions or Specified Domestic Transactions for failure to maintain or furnish prescribed documentation (Sections 271AA, 271G).
- INR 1,00,000 for failure to file Form 3CEB (Section 271BA).
- INR 5,00,000 for failure to furnish information and documentation in Form 3CEAA (Part A and Part B) or Form 3CEAB (Section 271GB).
- INR 5,00,000 for furnishing inaccurate information in Form 3CEAD/ Form 3CEAC, or INR 5,000 to 50,000 per day for non-furnishing of CbCR, depending on the days of delay (Section 271GB).