

Namibia

Summary of CbC Reporting and Transfer Pricing Documentation Rules

Country-by-Country Report

There are no OECD CbC reporting requirements in Namibia.

Master File

There are no OECD Master File requirements in Namibia.

Local File

There are no OECD Local File requirements in Namibia.

Transfer Pricing Documentation

Taxpayers are required to maintain transfer pricing documentation sufficient to demonstrate that the taxpayer has developed a sound transfer pricing policy, under which transfer prices are determined in accordance with the arm's length principle, by documenting the policies and procedures for determining the arm's length prices. The level of documentation required is dependent on the facts and circumstances of each case. The documentation should be prepared in English.

Transfer Pricing Disclosure

The electronic submission of the corporate income tax return includes a Related Party Information schedule that provides information on the name of the related party; the nature and amount of the related party transactions; and the method used to determine the arm's length price.