



Sonakshi JhunjhunwalaSunil Jhunjhunwala

Belgium: Tax authorities launch annual round of transfer pricing audits: Date 28th February, 2022 In recent years, it has become an annual expectation for the transfer pricing audit department (referred to as the “transfer pricing cell” or “TP Cell”) within the Belgian tax authority to start the new year with the launch of a round of transfer pricing audits, by sending transfer pricing-related requests for information (Vraag om inlichtingen / Demande de renseignements) to a number of Belgian taxpayers. A few trends observed from Belgian transfer pricing audits in recent years include: An increasing shift towards the use of tailored questionnaires as opposed to standardized questionnaires, and broadened scope of audits; Information gathering based on country- by-country (CbC) reports; A continuing goal of increasing the capacity of the Belgian tax authority to perform transfer p.....