

LATVIA

SMALL AND MEDIUM ENTERPRISES AND TRANSFER PRICING

1. Have you established a dedicated website/webpage as a single point of information for SMEs on transfer pricing matters? Alternatively, has information for SMEs on transfer pricing matters been made available electronically via an existing website/webpage? In which language(s) is the information available?

There is no established dedicated website/webpage as a single point of information for SMEs on transfer pricing matters in Latvia. The transfer pricing legislation is available via an existing webpage of the State Revenue Service (www.vid.gov.lv). Our transfer pricing legislation is equally applicable for all taxpayers, both for SMEs and large taxpayers. The information is available in Latvian.

2. Do you have a single definition of SME that applies for most direct tax purposes?

The national legislation of Latvia does not provide a definition of SME for direct tax purposes. Small enterprises which comply with certain criteria are able to pay the micro-enterprise tax instead of the income tax; therefore they are not obligated to comply with transfer pricing rules. Legislation on micro-enterprises does not provide any specific provisions on transfer pricing.

3. Do you apply a specific SME definition for transfer pricing purposes?

There is no specific definition.

4. What specific services for SMEs are in place e.g. advanced pricing agreements, dispute resolution (pre- or post-audit), etc.? Is information on these services available electronically on the website(s) identified in question 1 or elsewhere? In which language(s) is the information available?

No such specific services.

5. Are training materials made available to SMEs electronically via the website(s) identified in question 1 or elsewhere? In which language(s) is the information available?

No training materials on transfer pricing are available electronically.

6. Is information on procedures to provide SMEs with advance certainty on transfer pricing issues (e.g. advanced pricing agreements, rulings and clearances) available electronically via the website(s) identified in question 1 or it is only available from some other source? In which language(s) is the information available?

No such information available electronically.

7. Is there a dedicated contact point available to SMEs for transfer pricing compliance issues?

All tax issues including transfer pricing compliance issues (regardless of the size of the taxpayer) are treated by the State Revenue Service and the contact information is available on the official website www.vid.gov.lv.

8. Is there a dedicated contact point for advanced pricing agreements, clearances and rulings available to SMEs?

No

9. Is there a dedicated contact point available to SMEs who want to claim relief from double taxation as a result of a transfer pricing adjustment?

No