



Transfer pricing update

Key deadlines and enhanced Belgian TP requirements for FY25 (AY26)

Form 275 LF (Local File Form)

Form 275 LF must be filed together with the corporate income tax return. For calendar-year taxpayers, the FY 2025 (assessment year 2026) deadline is expected to be **30 September 2026**.

For **Form 275 LF**, the key changes include:

- more detailed reporting of intercompany transactions by business unit and by country
- additional reporting of tax identification numbers for key competitors and permanent establishments
- mandatory inclusion of the relevant country code or codes for section B12 on cost contribution agreements, advance pricing agreements, rulings and in-house (re)insurance policies

Form 275 MF (Master File Form)

Form 275 MF must be filed within 12 months after the last day of the group's reporting period. For calendar-year groups, the FY 2025 Master File deadline is therefore **31 December 2026**.

For **Form 275 MF**, the Belgian requirements have become more extensive and may go beyond what is typically included in an OECD-compliant Master File.

In particular, the Belgian tax authorities now expect:

- a more detailed value chain and functional analysis, including an assessment of value drivers, profit allocation and alignment with transfer pricing outcomes
- a detailed DEMPE analysis for intangibles
- information on hard-to-value intangibles
- more detailed information on the group's financing arrangements

For many groups, the existing OECD-compliant Master File may therefore need to be supplemented with a Belgium-specific addendum.

Form 275 CBC NOT (CbC reporting notification)

Belgian entities belonging to groups within the scope of Country-by-Country ("CbC") reporting should verify whether a Form 275 CBC NOT filing is required. Under the revised requirements, a filing is now mandatory not only for initial filings or amendments, but also when an existing notification is terminated, for example in the event of a dissolution or acquisition by another multinational group.

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