



Tax Alert

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English and Romanian

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The National Agency for Fiscal Administration (NAFA) has initiated the procedure for verifying potential profit shifting

On July 17, NAFA issued a press release announcing the start of information gathering process, aimed at updating the tax risk profile of 2,768 companies.

Between July 17 and August 29, 2025, NAFA will collect detailed information through the Virtual Private Space (VPS) regarding companies' group and third party service expenses for the period 2020–2024.

The data collection comes in addition to the existing reporting and provides the authorities with a more detailed view of the type and level of services that a company is incurring as part of its day-to-day activity, including the ones incurred with related parties. Taxpayers are expected to voluntarily declare expenses not covered by other tax declarations, such as those related to marketing, management or consultancy services or for the use of intellectual property.

NAFA emphasizes that the collected information will be used exclusively for analytical purposes and will not result in additional tax liabilities for the taxpayers.

Important to note: Taxpayers should pay attention to the way in which the information is provided, the quality of data available, as well the potential impact of provided the information to the tax authorities, considering also the other statements already submitted to the tax authorities containing similar information.

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Agenția Națională de Administrare Fiscală (ANAF) a demarat procedura verificării potențialelor exporturi de profituri

În data de 17 iulie, ANAF a emis un comunicat de presă prin care a anunțat demararea unui proces de colectare a informațiilor, cu scopul de a actualiza profilul de risc fiscal al 2.768 de societăți.

Între 17 iulie și 29 august 2025, ANAF va colecta informații detaliate prin intermediul Spațiului Privat Virtual (SPV) cu privire la cheltuielile grupului și ale terților pentru perioada 2020–2024.

Colectarea datelor vine în completarea raportării existente și oferă autorităților o imagine mai detaliată asupra naturii și complexității serviciilor suportate de o societate în cadrul activității sale curente, inclusiv a celor aferente tranzacțiilor cu părți afiliate. Se așteaptă de la contribuabilii să declare în mod voluntar cheltuielile care nu sunt acoperite de alte declarații fiscale, cum ar fi cele legate de serviciile de marketing, gestionare sau consultanță ori de utilizarea proprietății intelectuale.

ANAF subliniază că informațiile colectate vor fi utilizate exclusiv în scopuri analitice și nu vor conduce la obligații fiscale suplimentare pentru contribuabili.

De reținut: Contribuabilii ar trebui să acorde atenție modului în care informațiile sunt furnizate, calității datelor disponibile, precum și impactului potențial al transmiterii acestor informații către autoritățile fiscale, având în vedere și alte declarații deja depuse la autoritățile fiscale care conțin informații similare.

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