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Date received/Return Date



**ITF 12C2**

**ZIMBABWE REVENUE AUTHORITY  
TRANSFER PRICING RETURN  
Income Tax Act, (Chapter 23:06)**

**Tax Year Ended December .....**

**Name of the Company**.....

**BP Number:** .....**Financial year ended** .....

**The tax return is required to be completed by taxpayers with international and/or domestic transactions for the following types of aspects:-**

1. Controlled Transactions with related or associated persons/parties;
2. Activities of a branch or a permanent establishment within Zimbabwe;
3. Transactions with countries as set out in section 5.

For the purpose of this return, any transaction under sections 1, 2, 3, 4 & 5 will be treated as controlled or uncontrolled transactions. In filling out this return you are required to only show whole dollars.

**SECTION 1.1 – INTERNATIONAL RELATED PARTY INFORMATION**

List the industry that best describes the business activity undertaken by the company to which the controlled or uncontrolled transactions relate, in descending order of total dollar value. For each industry, specify the three principal foreign locations of these international related/associated persons in descending order of total dollar value and the total dollar value of related party dealings (excluding loans). The remaining transactions should be included under "Balance"

Industry	Amount \$	Countries	Countries	Countries
<b>Balance of related party international dealings</b>				

**SECTION 1.2 – DOMESTIC RELATED PARTY INFORMATION**

List the industry that best describes the business activity undertaken by the company to which the controlled or uncontrolled transactions relate, in descending order of total dollar value. For each industry, specify the three principal domestic related parties in descending order of total dollar value and the total dollar value of related party dealings (excluding loans). The remaining transactions should be included under "Balance"

Industry	Amount \$	Related Party	Related Party	Related Party
<b>Balance of related party domestic dealings</b>				

**SECTION 2 - REVENUE & EXPENDITURE ITEMS**

In this section you are required to list details of any revenue or expenditure items (in \$ terms) in relation to international/domestic dealings with associated enterprises

**PART A– BUSINESS ACTIVITIES UNDERTAKEN**

NATURE OF TRANSACTIONS WITH ASSOCIATED ENTERPRISES	AGGREGATE AMOUNT OF TRANSACTION	TERRITORIES COVERED BY THE TRANSACTION	INDICATE METHOD(S) APPLIED (BY TICKING THE APPROPRIATE BOX)						CHECK THE BOX IF A CHANGE OCCURRED DURING THE YEAR
			CUP	Resale price	Cost-plus	TNMM	T Profit split	Other	
<b>INCOME</b>									
Sales – stock, raw materials									
Sales – Other									
Services - Management, financial, administrative, marketing, training									
Research and Development									
Technical, Construction									
Services (Other)									
Commissions									

Royalties: patents									
Royalties: brands, trademarks/tradenames									
Royalties: know-how									
Royalties: other intellectual property rights									
Rent									
Financial									
Interest									
Discounts									
Insurance									
Derivative financial instruments									
Other income									
<b>EXPENSES</b>									
Purchases – stock, raw materials									
Purchases – other									
Services - Management, financial, administrative, marketing, training									
Research and Development									
Technical, Construction									
Services (Other)									
Commissions									
Royalties: patents									
Royalties: brands, trademarks/tradenames									
Royalties: know-how									
Royalties: other intellectual property rights									
Rent									
Financial									
Interest									
Discounts									

Insurance									
Derivative financial instruments									
Other expenses									

**PART B– ACQUISITION & DISPOSAL OF ASSETS**

NATURE OF TRANSACTIONS WITH ASSOCIATED ENTERPRISES	AGGREGATE AMOUNT OF TRANSACTION	TERRITORIES COVERED BY THE TRANSACTION	INDICATE METHOD(S) APPLIED (BY TICKING THE APPROPRIATE BOX)						CHECK THE BOX IF A CHANGE OCCURRED DURING THE YEAR
			CUP	Resale price	Cost-plus	TNM M	T Profit split	Other	
<b>ASSET ACQUISITIONS</b>									
Patents									
Trademarks/tradenames									
Goodwill									
Intangible personal property									
Tangible personal property									
Real property									
<b>ASSET DISPOSALS</b>									
Patents									
Trademarks/tradenames									
Goodwill									
Intangible personal property									
Tangible personal property									
Real property									

Indicate in the space below:

- ❖ Description of changes during the period
- ❖ Description of the other method applied
- ❖ and/or supplementary comments – You may attach your response if space is not sufficient



### SECTION 3 - LOANS

In respect of any loans with international/associated domestic parties you are required to complete the following sections.

		<b>Opening balance</b>	<b>Closing Balance</b>
Loans interest bearing	Amounts Borrowed	\$	\$
Loans interest bearing	Amounts Loaned	\$	\$
Loans - Interest free	Amounts Borrowed	\$	\$
Loans - Interest free	Amounts Loaned	\$	\$
Current accounts – receivable	Amounts received	\$	\$
Current accounts payable	Amounts paid	\$	\$

### SECTION 4 - NON-MONETARY CONSIDERATIONS

Have you received from or provided to a related/associated party, which is involved in an international/domestic transaction, for a non-monetary consideration? **Yes/No** \_\_\_\_\_. If Yes provide details below:

### SECTION 5 - TRANSACTIONS WITH PARTIES IN THE FOLLOWING SPECIFIED COUNTRIES

Have you made any transaction with a party in any of the following countries? (Please tick where appropriate)

<b>Country</b>	<b>Country</b>	<b>Country</b>	<b>Country</b>	<b>Country</b>	<b>Country</b>
Andorra	Anguilla	Antigua & Barbuda	Aruba	Bahamas	
Bahrain	Barbados	Belize	Bermuda	British Virgin Islands	
Cayman Islands	Cook Islands	Cyprus,	Dominica	Gibraltar,	
Grenada	Guernsey/Sark/Alderney	Isle of man,	Jersey,	Liberia,	
Liechtenstein	Luxembourg	Maldives	Malta	Marshall Islands	
Mauritius	Monaco	Montserrat	Nauru	Netherlands Antilles	

Niue	Panama	Samoa,	San Marino	Seychelles
Seychelles	Singapore	St Lucia	St Christopher (St Kitts) & Nevis	St Vincent & Grenadians
Tonga	Turks & Caicos	US Virgin Islands	Vanuatu	Other

If yes, please supply the nature of the transactions:-

Amount \$ \_\_\_\_\_ Type of transaction \_\_\_\_\_ Country \_\_\_\_\_

Amount \$ \_\_\_\_\_ Type of transaction \_\_\_\_\_ Country \_\_\_\_\_

Amount \$ \_\_\_\_\_ Type of transaction \_\_\_\_\_ Country \_\_\_\_\_

#### SECTION 6 – DOCUMENTATION

Do you have documentation for the international/domestic transactions as described in section 1, 2, 3, 4 and 5? Yes/No \_\_\_\_\_

If YES, What percentage of international transactions is covered by the documentation?  
\_\_\_\_\_ %

If NO, Indicate the transactions without transfer pricing documentation

#### SECTION 7 – PERMANENT ESTABLISHMENT

Are you aware of any foreign related or unrelated company/entity that you deal with that operates a branch/office/factory/workshop/mine/quarry/building site/installation project/ place of management, assembly line in Zimbabwe? If yes, give details.

Name of entity	Country of Residence	Physical address in Zimbabwe	Official representative	Contact telephone numbers and email addresses

#### **DECLARATION**

***– Note: Giving false information in the return or concealing any part of the taxable income may lead to prosecution and arraignment.***

I (**full name, please print**).....being the duly appointed Public Officer/ Representative of the taxpayer (*delete the inapplicable*) hereby declare that this return contains a complete, just and true statement of the required particulars with regard to controlled and uncontrolled transactions of..... (**Name of taxpayer**) based on the signed accounts in respect of the accounting year ending on .....

**Print Name of the Person/Public Officer/Representative:** .....

**Signature:** .....

**Date:** .....

*(NB: please affix your official stamp to authenticate document)*