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Under section 58C (2) (a) of the IRO, a Hong Kong entity must prepare a master file and a local file no later than 9 months after the end of its accounting period. The Hong Kong entity has to declare in the profits tax return and supplementary form S2 whether a master file and a local file have to be prepared.

IRD : Transfer Pricing Documentation – Master File and ...

(a) the jurisdiction of tax residence of the group's UPE (i.e. Jurisdiction U) is a

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FAQ on Country-by-Country (CbC) Reporting

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