

Israel

Transfer Pricing Country Profile

February 2022

| | | SUMMARY | REFERENCE |
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| The Arm's Length Principle | | | |
| 1 | Does your domestic legislation or regulation make reference to the Arm's Length Principle? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Section 85A of the Income Tax Ordinance (New Version), 5721- 1961 |
| 2 | What is the role of the OECD Transfer Pricing Guidelines under your domestic legislation? | <p>According to section 6 of the Income Tax Regulations (Determination of Market Conditions), 5767-2006:</p> <p>"A market conditions study that was conducted before the publication of these regulations will be regarded as a market conditions study that was conducted in accordance with these regulations, this for two years from the date of their publication, provided that it was conducted in accordance with the accepted guidelines published by the OECD or its member countries."</p> <p>The regulations were published on November 2006.</p> <p>There is no other reference in the domestic legislation to the TPG. However, the TPG can be regarded as one of the interpretation aids.</p> | Section 6 of the Income Tax Regulations (Determination of Market Conditions), 5767-2006 |
| 3 | Does your domestic legislation or regulation provide a definition of related parties? If so, please provide the definition contained under your domestic law or regulation. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>According to Section 85A(b) of the Income Tax Ordinance (New Version):</p> <p>"Special relationships" – including relationships between a person and his relative, as well as control of one party to a transaction over the other, or control of one person over the parties to the transaction, directly or indirectly, alone or together with another;</p> <p>"Control" – a holding, directly or indirectly, of 50% or more in one of the means of control, at least one day during the tax year;</p> | <p>Section 85A(b) of the Income Tax Ordinance (New Version), 5721- 1961</p> <p>Section 76(d) of the Income Tax Ordinance (New Version), 5721- 1961</p> <p>Section 88 of the Income Tax Ordinance (New Version), 5721- 1961</p> |

“**Relative**” – as defined in Paragraph 76(d);
“**Means of control**” and “**Together with another**” – as defined in Paragraph 88.

Section 76(d) of the Income Tax Ordinance (New Version):
"Relative"- spouse, brother, sister, parent, parent's parent, descendant, the spouse's descendants and the spouse of any of these.

Section 88 of the Income Tax Ordinance (New Version):
"Means of control" – in a body of persons – each of the following:

- (1) the right to profits;
- (2) the right to appoint a Director or General Manager of the company, or holders of similar positions in other bodies of persons;
- (3) the right to vote at the company's General Meetings, or in the corresponding body of another body of persons;
- (4) the right to a share of the balance of assets after debts have been paid at liquidation;
- (5) the right to instruct the holder of one of the rights said in paragraphs (1) to (4) how to exercise that right;

all whether by virtue of shares, rights to shares or other rights, or in any other manner, including through voting or trusteeship agreements.

“**Together with another**”- Together with his relative, and also together with a person who is not his relative, if they regularly – directly or indirectly – cooperate by agreement on matters substantive to the body of persons.

Transfer Pricing Methods

4 **Does your domestic legislation provide for transfer pricing methods to be used in respect of transactions between related parties?**

Yes
 No

If affirmative, please check those provided for in your legislation:

| CUP | Resale Price | Cost Plus | TNMM | Profit Split | Other (<i>If so, please describe</i>) |
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| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

The definition of "others" in the section 2(3) of the Income Tax Regulations (Determination of Market Conditions), 5767-2006 is as follows:
"Should it not be possible to use a price comparison method or one of the methods detailed in sub-paragraph (2) – another method that is the most suitable in the

Section 2(a) in the Income Tax Regulations (Determination of Market Conditions), 5767-2006

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| | | circumstances, which compares the international transaction with a similar transaction" | |
| 5 | <p>Which criterion is used in your jurisdiction for the application of transfer pricing methods?</p> | <p>Please check all that apply:</p> <p><input checked="" type="checkbox"/> Hierarchy of methods</p> <p><input checked="" type="checkbox"/> Most appropriate method</p> <p><input type="checkbox"/> Other (<i>if so, please explain</i>)</p> <hr/> <p>For the purpose of determining whether an international transaction that has been conducted is a transaction in market conditions, a market conditions study will be conducted in which an international transaction will be compared with similar transactions of the tested party, in accordance with one of the methods detailed below:</p> <p>(1) A method that compares between the price determined in the international transaction and the price determined in a similar transaction (in these regulations – the compared price method);</p> <p>(2) Should it not be possible to use the price comparison method – in accordance with one of the following comparison methods that is the most suitable in the circumstances:</p> <p>(a) A method that compares the profitability margin between the international transaction and the similar transaction;</p> <p>(b) A method that compares the international transaction with the similar transaction, in accordance with the accepted distribution of profit and loss between parties in joint activity, taking into account the contribution of each party to the transaction, including the party’s exposure to risks and rights to the assets connected with the transaction;</p> <p>(3) Should it not be possible to use a price comparison method or one of the methods detailed in sub-paragraph (2) – another method that is the most suitable in the circumstances, which compares the international transaction with a similar transaction.</p> <p>Profitability margin defined as follow:</p> <p>(1) In an area of activity in which a method is accepted determining a transaction price as a profit at a fixed rate that is added to the direct costs is– the profit at the fixed rate that was obtained in similar transactions;</p> <p>(2) In an area of activity in which a method is accepted determining a transaction price as a gross profit at a fixed rate of the sales of the purchasing party that is the tested party or a party similar to it the gross profit margin that was obtained in similar transactions;</p> <p>(3) Should it not be possible to determine the profit margin as said in sub-paragraphs (1) or (2) – the profit margin according to one of the following</p> | <p>Section 2(a) of the Income Tax Regulations (Determination of Market Conditions), 5767-2006</p> <p>Section 1 of the Income Tax Regulations (Determination of Market Conditions), 5767-2006</p> |

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| | | <p>profitability indexes, which is most suitable for activity in the international transaction:</p> <p>(a) The operating profit margin or operating loss margin according to profit and loss statements obtained in similar transactions;</p> <p>(b) The ratio between the profit or loss, as applicable, and assets, liabilities and capital, in whole or in part, as applicable;</p> <p>(c) Another profitability index that is the most suitable in the circumstances.</p> | |
| 6 | <p>If your domestic legislation or regulations contain specific guidance on commodity transactions, indicate which of the following approaches is followed.</p> | <p><input checked="" type="checkbox"/> For controlled transactions involving commodities, the guidance contained in paragraphs 2.18-2.22 of the TPG is followed.</p> <p><input type="checkbox"/> Domestic legislation mandates the use of a specific method for controlled transactions involving commodities (<i>if so, please explain</i>)</p> <p><input type="checkbox"/> Other (<i>if so, please explain</i>)</p> | |
| | | <p>Israel's domestic legislation or regulations do not contain a special treatment for commodity transaction and tend to rely on the OECD TPG.</p> | |
| Comparability Analysis | | | |
| 7 | <p>Does your jurisdiction follow (or largely follow) the guidance on comparability analysis outlined in Chapter III of the TPG?</p> | <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> | <p>The Income Tax Regulations (Determination of Market Conditions), 5767-2006</p> |
| 8 | <p>Is there a preference in your jurisdiction for domestic comparables over foreign comparables?</p> | <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> | |
| 9 | <p>Does your tax administration use secret comparables for transfer pricing assessment purposes?</p> | <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> | |
| 10 | <p>Does your legislation allow or require the use of an arm's length range and/or statistical measure for determining arm's length remuneration?</p> | <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> | <p>Section 2(b) and 2(c) of the Income Tax Regulations (Determination of Market Conditions), 5767-2006</p> |
| | | <p>An international transaction will be regarded as a transaction at market conditions if as a result of its comparison in accordance with the comparison methods for similar transactions, the result obtained does not exceed the inter-quarterly range obtained in the comparison with similar transactions. Should however the comparison method be the price comparison method and adjustments were not</p> | <p>Section 2(c) of the Income Tax Regulations (Determination of Market Conditions), 5767-2006</p> |

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| | | <p>made for cancelling out the effect of the difference on the comparability criteria, the transaction will be regarded as a transaction at market conditions if the price does not exceed the value range in similar transactions.</p> <p>Should it not be possible to regard an international transaction as a transaction at market conditions as said above, the transaction price will be reported according to the value located in the 50th centile in the value range.</p> | |
| 11 | <p>Are comparability adjustments required under your domestic legislation or regulations?</p> | <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>The definition of Similar transaction:</p> <p>Any one of these, providing that, if no identical comparability criteria existed, adjustments were made in a manner whereby the impact of the difference between the comparability criteria of the results is canceled out:</p> <p>(1) A transaction between the tested party and a party that does not have special relationships with that party, in which the comparability criteria are identical, in their entirety or most of them, to the comparability criteria in an international transaction;</p> <p>(2) If there was no transaction as said in sub-paragraph (1) – a transaction between parties among which special relationships do not exist, in which the comparability criteria are identical or similar, all or most of them, to the comparability criteria in a transaction made by the tested party;</p> | <p>The Income Tax Regulations (Determination of Market Conditions), 5767-2006</p> |
| Intangible Property | | | |
| 12 | <p>Does your domestic legislation or regulations contain guidance specific to the pricing of controlled transactions involving intangibles?</p> | <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Israel's domestic legislation or regulations do not contain specific guidance on transactions involving intangibles and tend to rely on the OECD TPG.</p> | |
| 13 | <p>Does your domestic legislation or regulation provide for transfer pricing rules or special measures regarding hard-to-value intangibles (HTVI)?</p> | <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> | |
| 14 | <p>Are there any other rules outside transfer pricing rules that are relevant</p> | <p><input type="checkbox"/> Yes</p> | |

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| | for the tax treatment of transactions involving intangibles? | <input checked="" type="checkbox"/> No | |
| Intra-Group Services | | | |
| 15 | Does your domestic legislation or regulations provide guidance specific to intra-group services transactions? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Israel's domestic legislation or regulations do not contain specific guidance on intra-group services and tend to rely on the OECD TPG. | |
| 16 | Do you have any simplified approach for low value-adding intra-group services? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Section 3.1 in Circular 12/2018 is based on paragraph D of Chapter VII of the OECD TPG. | Circular 12/2018 : transfer pricing – profitability rates and range for certain transactions |
| 17 | Are there any other rules outside transfer pricing rules that are relevant for the tax treatment of transactions involving services? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Financial Transactions | | | |
| 18 | [NEW] Does your domestic legislation or regulations provide guidance specific to financial transactions? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No There is special consideration for loans or capital note subject to several conditions such as: <ol style="list-style-type: none"> 1. The loan recipient is a company under the control of the lender; 2. The loan is not index-linked and does not bear any interest or return; 3. The loan is not repayable before the end of a period of five years from the date of its grant; 4. The repayment of the loan is deferred to other liabilities and prior only to the distribution of assets to the shareholders in liquidation; In those situations the taxpayer is not required to report an interest raising income from those loans. In addition, there is special consideration to changes in the currency exchange rate. | Section 85A(f) of the Income Tax Ordinance (New Version), 5721- 1961 Circular 13/2018 Form 1485 |

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| | | Further, Israel would tend to rely on the OECD guidance on financial transactions. | |
| 19 | [NEW] Are there any other rules outside transfer pricing rules that are relevant for the tax treatment of financial transactions? <i>(e.g. whether your jurisdiction has implemented the measures in BEPS Action 4 to limit interest deductions and other financial payments or any similar rules)</i> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Cost Contribution Agreements | | | |
| 20 | Does your jurisdiction have legislation or regulations on cost contribution agreements? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No CCAs are dealt with as part of the "other method" definition in the regulation: <i>"Should it not be possible to use a price comparison method or one of the methods detailed in sub-paragraph (2) – another method that is the most suitable in the circumstances, which compares the international transaction with a similar transaction"</i> | |

Transfer Pricing Documentation

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| 21 | <p>Does your legislation or regulations require the taxpayer to prepare transfer pricing documentation?</p> | <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><i>If affirmative, please check all that apply:</i></p> <p><input type="checkbox"/> Master file consistent with Annex I to Chapter V of the TPG</p> <p><input type="checkbox"/> Local file consistent with Annex II to Chapter V of the TPG</p> <p><input type="checkbox"/> Country-by-country report consistent with Annex III to Chapter V of the TPG</p> <p><input type="checkbox"/> Specific transfer pricing returns (separate or annexed to the tax return)</p> <p><input checked="" type="checkbox"/> Other (specify):</p> <p>The legislation requires the taxpayer to prepare transfer pricing documentation including a market conditions study.</p> | <p>Section 85A(c) of the Income Tax Ordinance (New Version), 5721- 1961</p> <p>Section 5 of the Income Tax Regulations (Determination of Market Conditions), 5767-2006</p> |
| 22 | <p>Please briefly explain the relevant requirements related to filing of transfer pricing documentation (i.e. timing for preparation or submission, languages, etc.)</p> | <p>The annual tax report requires a statement whether international transaction (according to section 85A of the Income Tax Ordinance) was conducted.</p> <p>If so, forms (1385 and, if required, 1485) are filed together with the annual tax report and describe the international transaction. A separate form should be filed for each transaction.</p> <p>The market conditions study should be submitted to the assessing officer at the assessing officer's request within 60 days. The languages that should the documentation be submitted are Hebrew or English.</p> | <p>Section 85A(c) of the Income Tax Ordinance (New Version), 5721- 1961</p> <p>Section 5 of the Income Tax Regulations (Determination of Market Conditions), 5767-2006</p> <p>Form 1385</p> <p>Form 1485</p> |
| 23 | <p>Does your legislation provide for specific transfer pricing penalties and/or compliance incentives regarding transfer pricing documentation?</p> | <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> | |
| 24 | <p>If your legislation provides for exemption from transfer pricing documentation obligations, please explain.</p> | <p>"A one-time transaction" legislation provides an exemption from some of the transfer pricing documentation obligations – there is no need to perform a comparability analysis.</p> <p>In briefly, a one-time transaction an international transaction (as defined in the regulations) that the taxpayer does not usually carry out transactions of the same kind with someone with whom he has a special relationship. The</p> | <p>Section 4 of Income Tax Regulations (Determination of Market Conditions), 5767-2006</p> |

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| | | uniqueness of the transaction will be expressed with very low frequency and its low volume per se and in relation to other transactions of the taxpayer. For example, a one-time transaction that does not exceed 10% of the taxpayer's total income (turnover) in the same field (business, financing, etc.) from parties with whom he has no special relationship and a transaction that does not exceed NIS 4 000 000 will be considered a one-time transaction. | |
| Administrative Approaches to Avoiding and Resolving Disputes | | | |
| 25 | Which mechanisms are available in your jurisdiction to prevent and/or resolve transfer pricing disputes? | <p>Please check those that apply:</p> <p><input checked="" type="checkbox"/> Rulings</p> <p><input type="checkbox"/> Enhanced engagement programs</p> <p><input checked="" type="checkbox"/> Advance Pricing Agreements (APA)</p> <p style="padding-left: 20px;"><input checked="" type="checkbox"/> Unilateral APAs</p> <p style="padding-left: 20px;"><input checked="" type="checkbox"/> Bilateral APAs.</p> <p style="padding-left: 20px;"><input checked="" type="checkbox"/> Multilateral APAs</p> <p><input checked="" type="checkbox"/> Mutual Agreement Procedures</p> <p><input type="checkbox"/> Other (<i>please specify</i>):</p> | <p>Section 85A(d) the Income Tax Ordinance (New Version), 5721- 1961</p> <p>Israel's MAP Profile</p> |
| | | For further information, please refer to Israel's MAP Profile. | |
| Safe Harbours and Other Simplification Measures | | | |
| 26 | Does your jurisdiction have rules on safe harbours in respect of certain industries, types of taxpayers, or types of transactions? | <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>In briefly, in case of distribution transaction, when the distributor is Low Risk Limited, without intangible ownership, the market price should be between 3%-4% based on OM index.</p> <p>In case of marketing transaction when the tested party without intangible ownership the market price should be between 10%-12% based on NCP index.</p> | <p>Circular 12/2018 : transfer pricing – profitability rates and range for certain transactions</p> |
| 27 | Does your jurisdiction have any other simplification measures not listed in this | <input type="checkbox"/> Yes | |

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| | questionnaire? If so, please provide a brief explanation. | <input checked="" type="checkbox"/> No | |
| Other Legislative Aspects or Administrative Procedures | | | |
| 28 | Does your jurisdiction allow/require taxpayers to make year-end adjustments? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| | | Year-end adjustments are allowed prior to submitting the income tax report. | |
| 29 | Does your jurisdiction make secondary adjustments? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| | | In cases where the transaction has not been reported according to arm's length conditions set in the Income Tax Ordinance and the regulations, the difference between the price set between the related parties and the arm's length price (assuming the funds in the amount of the difference are not transferred) should be classified as a loan and/or a distribution of dividends according to the circumstances of the matter. | |
| Attribution of Profits to Permanent Establishments | | | |
| 30 | [NEW] Does your jurisdiction follow the Authorised OECD Approaches for the attribution of profits to PEs (AOA)? | <input type="checkbox"/> Yes <i>In how many tax treaties?</i> <i>If yes, how do you implement it in cases, where the old tax treaties do not contain the new version of Article 7 (OECD MTC 2010 and later)</i> | |
| | | <input type="checkbox"/> No <i>In how many tax treaties?</i> | |
| 31 | [NEW] Does your jurisdiction follow also another approach? | <input type="checkbox"/> Yes <input type="checkbox"/> No <i>Provide description of the situations, when the other approach(es) applies and description of the key features of how the approach(es) applies.</i> | |

Other Relevant Information

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| 32 | <p>Other legislative aspects or administrative procedures regarding transfer pricing</p> | <p>Circular number 3/2008 - guidelines about transfer pricing in Israel.</p> <p>Circular 11/2018: determination of the appropriate TP method for activities related to distribution, marketing and sales of multinational group within the local market.</p> <p>Circular 1/2020 deals with transfer pricing burden of proof.</p> <p>Circular 15/2018 deals with transfer pricing aspect of business restructurings base on Chapter IX in OECD TPG.</p> | <p>Circular 3/2008</p> <p>Circular 11/2018</p> <p>Circular 1/2020</p> <p>Circular 15/2018</p> |
| 33 | <p>Other relevant information (e.g. <i>whether your jurisdiction is preparing new transfer pricing regulations, or other relevant aspects not addressed in this questionnaire</i>)</p> | <p>There is a bill in place to amend the transfer pricing legislation which include changes in documentations requirement.</p> | |

For more information, please visit: <https://oe.cd/transfer-pricing-country-profiles>