



## Australia Transfer Pricing Changes – Act Now for 2026 Compliance

Australia is introducing transfer pricing and tax transparency changes that will impact many multinational clients in 2026. These new rules (part of the OECD BEPS agenda) mean a significantly higher compliance burden for large multinationals.

### What's changing?

- **Expanded Local File Requirements:** The ATO now requires significantly more detail in the Local File, focusing on high-risk areas like intercompany financing, intangibles, and business restructures. No exemptions – even groups with no related-party dealings must file an Australian Local File going forward. This will increase compliance work for our clients.
- **Public Country-by-Country Reporting:** Multinationals must publicly disclose their tax and profit data for each jurisdiction via a new Public CbC report. The first reports (for year ending 30 June 2025) are due by 30 June 2026, and the ATO will publish this information on a public website, clients' tax affairs will be visible to the public, investors, and media. Important to note is that the Australian CbCR Public reporting requirements differ from the OECD and EU parameters, and require considerable work on the data set to meet Australian requirements + exemptions are not really possible + penalties are high so non reporting is not an option.

For any inquiry, please feel free to contact [Teena Ingram](#) from WTS Australia.



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