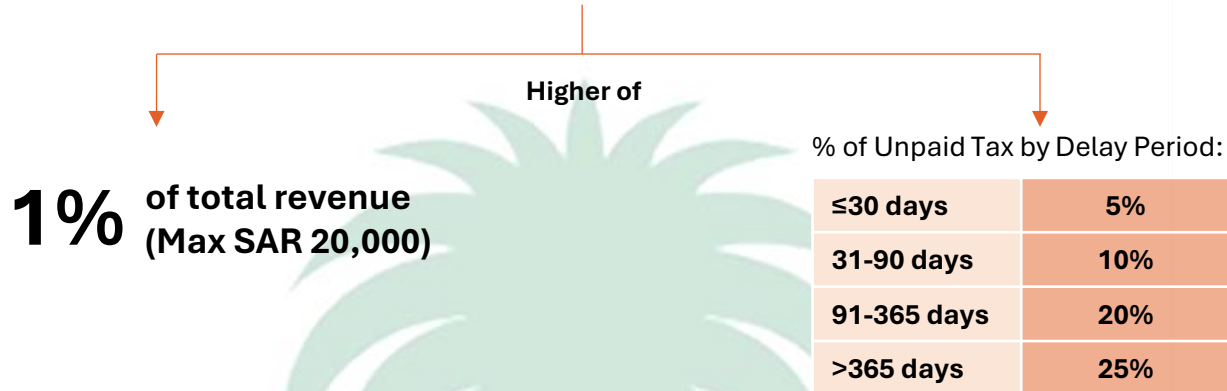


Article 67 of the updated Income Tax Law (Ministerial Resolution No. 1535) aligns with **Article 76 of the Income Tax Law (RD M/1, 2004, as amended)** for filing non-compliance. Further, **Article 77(b)** applies in cases of misrepresentation (25% of tax difference), while **Article 77(a)** governs late payment, imposing a delay fine of **1% per 30 days**.

 Filing Non-Compliance

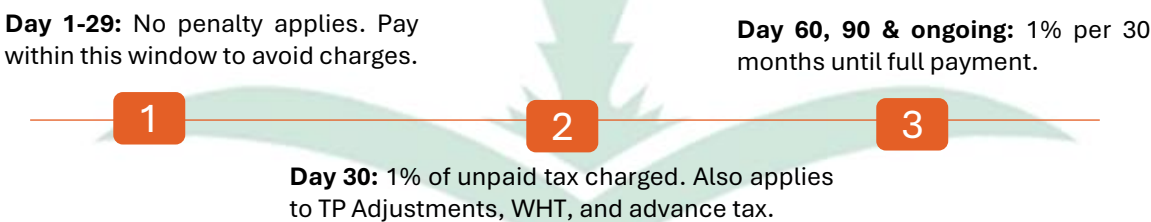
Failure to file DFCT along with the tax return within 120 days from the FY-end results:



 Misrepresentation/ Submission of Incorrect Information

If ZATCA determines that the issue arises from false or misleading information, non-compliance, or concealment of records/transactions, a penalty of 25% of the tax difference may be imposed.

 Delay in Tax Payment (Including TP Adjustments)



 TP Documentation Non-Compliance



 Key TP Risk Triggers

