

**REPUBLIC OF THE PHILIPPINES**  
**DEPARTMENT OF FINANCE**  
**BUREAU OF INTERNAL REVENUE**  
Quezon City

March 24, 2008

**REVENUE MEMORANDUM CIRCULAR NO. 26 - 2008**

SUBJECT: Interim Transfer Pricing Guidelines

TO : All Internal Revenue Officials, Employees, and Others Concerned.

---

For the guidance and information of all internal revenue officials, employees and others concerned, please be notified that the Bureau of Internal Revenue (BIR) is revising the final draft of the Revenue Regulations on Transfer Pricing. In view of the upcoming tax filing season and in order to preclude any issue that may arise in the interim, the BIR, as a matter of policy subscribes to the OECD Transfer Pricing Guidelines.

Accordingly, until the said Regulations are issued, any and all concerns shall be resolved in accordance with the principles laid down by the said guidelines.

All revenue officers and employees are enjoined to give this Circular as wide a publicity as possible.

(Original Signed)  
**LILIAN B. HEFTI**  
Commissioner of Internal Revenue

cc: Secretary of Finance