



REGIONAL SEMINAR ON INTERNATIONAL TAX DEVELOPMENTS FOR EUROPE AND CENTRAL ASIA

COUNTRY-BY-COUNTRY REPORTING: IMPLEMENTATION, BENEFITS AND CHALLENGES

18 – 20 March 2025

OECD Multilateral Tax Centre (MTC), Vienna



WHAT IS COUNTRY-BY-COUNTRY REPORTING?



What is CbC reporting?



- Under BEPS Action 13, MNEs file an annual country-by-country report (CbC report) including information on their activities, returns and tax paid in each jurisdiction in which they do business
- The CbC report is filed in the jurisdiction where the Ultimate Parent of the MNE is resident and exchanged with other jurisdictions under the Multilateral Convention (MAAC) or bilateral Double Tax Conventions or TIEAs
- Country-by-country reporting is a BEPS minimum standard
- The OECD Secretariat will support a jurisdiction at all stages of the implementation of CbC reporting



The scope of CbC reporting

- A CbC report must be filed by all MNEs with group revenues in excess of EUR 750 million (or equivalent in another currency)
- Around 8 000 MNEs are within the scope of CbC reporting
- A tax administration in a jurisdiction that meets the minimum standard will receive an annual CbC report on each of these groups with a resident entity or a PE in its jurisdiction
- Currently, around 120 jurisdictions have introduced a requirement for the filing of CbC reports and around 80 jurisdictions are receiving CbC reports each year through exchange of information



Overview of allocation of income, taxes and business activities by tax jurisdiction

[illegible]



List of all the Constituent Entities of the MNE group included in each aggregation per tax jurisdiction

[illegible]



The content of a CbC report – Table 3

Additional information

Name of the MNE group:

Fiscal year concerned:

Please include any further brief information or explanation you consider necessary or that would facilitate the understanding of the compulsory information provided in the Country-by-Country Report.



THE BUILDING BLOCKS OF CBC REPORTING



The building blocks of CbC reporting

These do NOT have to be implemented in any particular order

A domestic requirement for the filing of CbC reports

An exchange network (e.g. MAAC, DTCs or TIEAs) & agreements for the exchange of CbC reports (e.g. CbC MCAA or bilateral QCAs)

Controls to ensure the confidentiality of CbC reports and the safeguarding of data

Controls to ensure the appropriate use of CbC reports

Domestic EoI tools and processes

Connection to the Common Transmission System

Domestic IT solutions to prepare and encrypt / decrypt files

Tools to use CbC reports in risk assessment



The building blocks of CbC reporting

Elements of the minimum standard

A domestic requirement for the filing of CbC reports

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The building blocks of CbC reporting

Support is available across all building blocks

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**THE BENEFITS OF COUNTRY-BY-
COUNTRY REPORTING...**

**...AND TOOLS PROVIDED TO
SUPPORT THE EFFECTIVE USE OF
CBC REPORTS**



Benefits of CbC reporting

- Tax administrations often struggle in obtaining information on the global operations of MNEs operating in their jurisdiction
- This makes assessing whether an MNE poses a risk to that jurisdiction difficult
- CbC reporting provides tax administrations with unprecedented information on large MNEs with operations in their jurisdiction
- The use of CbC reports by tax administrations has facilitated:
 - the development of guidance and common risk assessment tools to support the use of data
 - bilateral and multilateral conversations between tax administrations to ensure compliance
 - greater voluntary compliance as MNEs know data on their activities is available
- **Many of the most commonly used indicators that an MNE may be (or may not be) high risk can be identified using data in its CbC report**



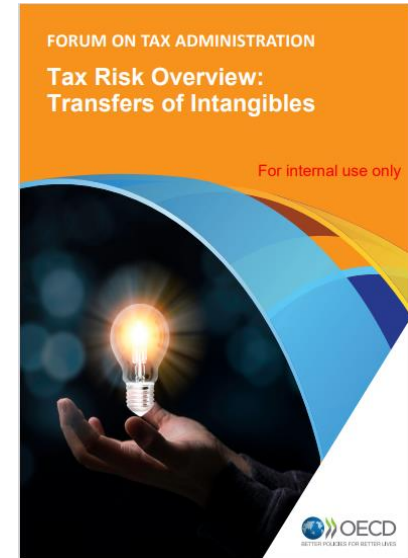
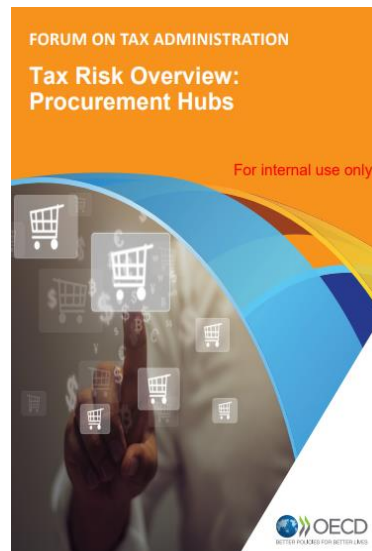
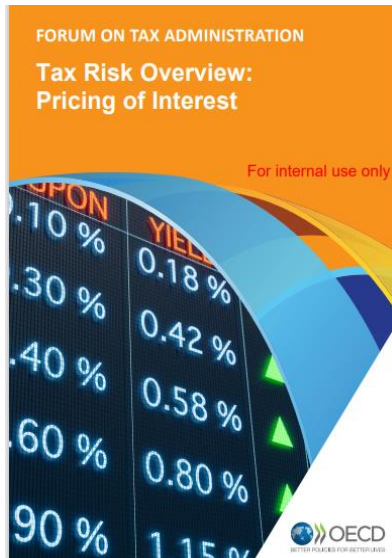
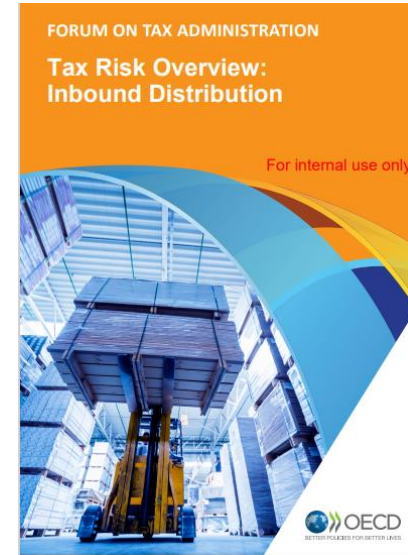
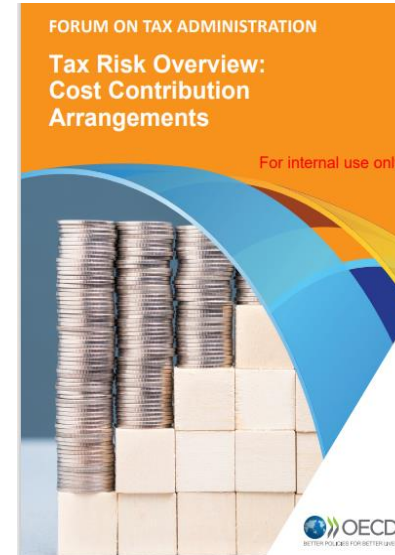
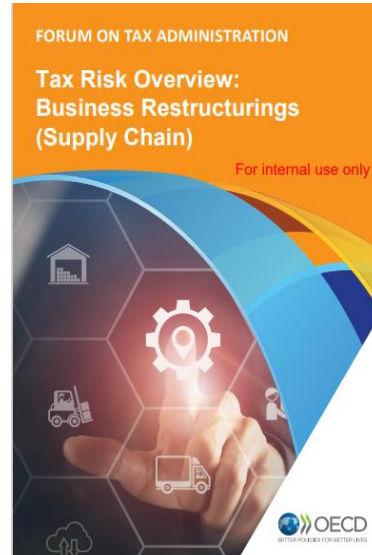
Useful possible risk indicators that may be detected using the data contained in a CbC report

| | | | |
|---|--|---|--|
| The size of the footprint of an MNE in a jurisdiction | An MNE has mobile activities in jurisdictions with a low effective tax rate | An MNE has a high value/proportion of related party revenues in a jurisdiction | An MNE has jurisdictions with significant profits but little substantial activity |
| An MNE has jurisdictions with significant profits but low tax accrued | An MNE has jurisdictions with significant activities but low profits (or losses) | An MNE has activities in a jurisdiction which poses a BEPS risk (jurisdictions of interest) | Data in a CbC report is inconsistent with that previously provided by entities in an MNE |
| There are changes in an MNE's structure, including the location of assets or activities | IP is separated from related activities within an MNE | An MNE has marketing entities located outside its key markets | An MNE has procurement entities located outside its key manufacturing locations |
| An MNE's results in a jurisdiction deviate from potential comparables | An MNE's results in a jurisdiction do not reflect market trends | Income tax paid is consistently lower than income tax accrued in some jurisdictions | An MNE includes dual resident entities |
| An MNE includes entities with no tax residence | An MNE has "stateless revenues" | An MNE has activities in a jurisdiction that are limited to those that pose less risk | Many, many others..... |



Tools provided by the OECD to support the effective use of CbC reports

Transfer Pricing Tax Risk Overviews (TROves): Describe the risk indicators and sources of data most commonly used in risk assessing seven key TP areas





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CbC reporting Handbook on Effective Tax Risk Assessment: Describes how a CbC report can be used to detect these and other risk indicators

BEPS Action 13
Country-by-Country Reporting
**HANDBOOK ON
EFFECTIVE TAX RISK
ASSESSMENT**

Chapter 4

Incorporating CbC Reports Into a Tax Authority's Tax Risk Assessment Framework

32. This chapter considers how CbC Reports may be incorporated into a jurisdiction's tax risk assessment framework, looking at three levels of detail, considering:

- at a high level, different approaches to tax risk assessment that may be applied
- at a middle level, different ways in which CbC information can be used to detect indicators of tax risk within these approaches
- at a detailed level, different tax risk indicators that may be detected.

Using CbC Reports within different approaches to tax risk assessment

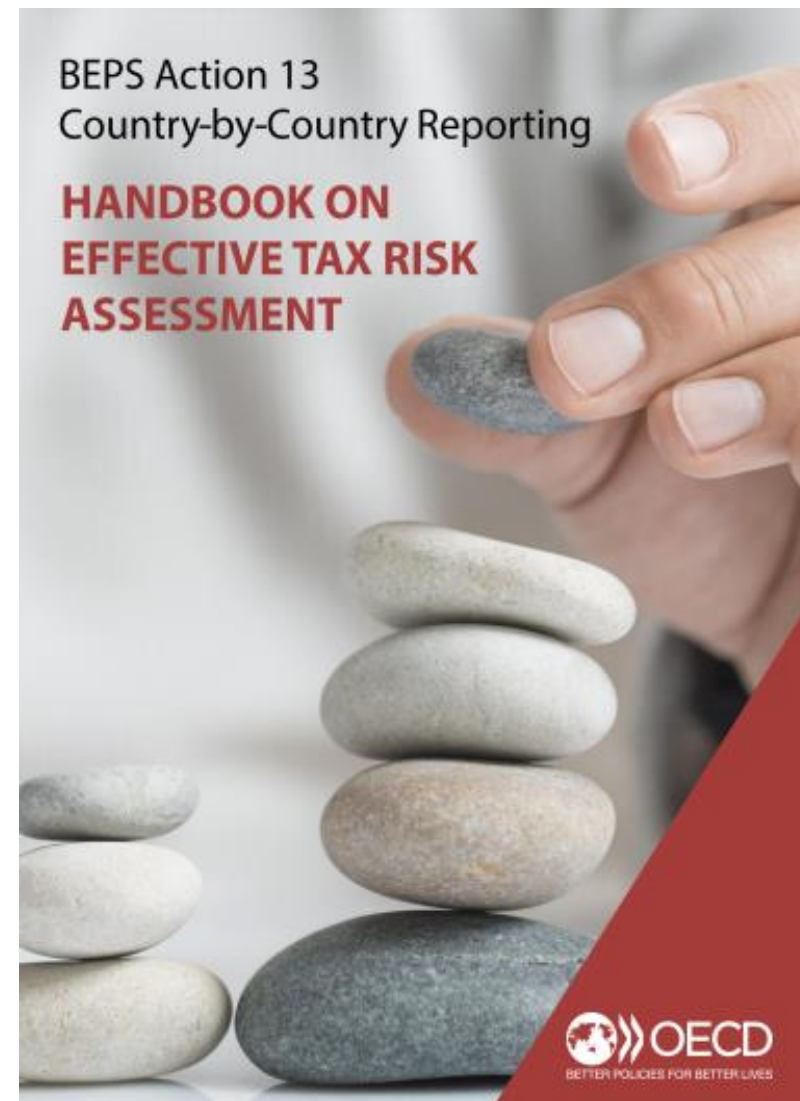
33. Tax authorities currently adopt a variety of approaches to tax risk assessment and may look to make changes to these approaches following the introduction of CbC Reporting (e.g. some tax authorities have introduced centralised processes for risk assessment using CbC Reports in order to ensure the appropriate use of CbC information). For jurisdictions with mature transfer pricing risk assessment and audit procedures, CbC information will play a useful role in enhancing and corroborating these processes. For other jurisdictions, CbC Reports together with the master file and local file will provide a strong basis for developing such procedures. Irrespective of the overall framework for tax risk assessment applied, CbC information can be incorporated into it and has the potential to add important value in each case. This is in particular where CbC information is used alongside and in combination with data from other sources, as considered later in this guidance.

34. The ways in which CbC Reports can be incorporated into a tax authority's risk assessment processes will depend upon the overall framework in place, but examples of how this may be done include the following:

- The tax authority in the jurisdiction where the ultimate parent entity of an MNE group is resident will typically receive the group's CbC Report within 12 months of the end of the group's reporting fiscal year, with the exact timing depending upon the filing deadline under domestic rules. This tax authority then exchanges the CbC Report with other jurisdictions where the group has activity (subject to conditions) within 15 months of the end of the group's reporting fiscal year (or within 18 months in the first year of reporting). Where a tax authority conducts a risk assessment before a taxpayer's tax return is filed, the group's CbC Report will not yet have been received for the year under consideration. However, once the CbC Report is received, it may be used by the tax authority to test the assumptions used and conclusions reached in the pre-filing risk assessment. The CbC Report could

Tax risk indicators that may be detected using a CbC Report

| Potential tax risk indicator | What this could mean | How else it might be explained |
|---|---|--|
| The footprint of a group in a jurisdiction | A group with a small footprint may have less potential to pose significant tax risk | A low footprint on a CbC Report could be misleading if the activities in a jurisdiction are more significant. This should be corroborated against other information and the experience of the tax compliance team. |
| A group's activities in a jurisdiction are limited to those that pose less risk | A group's activities in a jurisdiction may be of a type that are subject to a lower level of tax (e.g. where dividends and gains earned by a holding entity benefit from a participation exemption) | An entity whose main activity would typically pose lower tax risk may still engage in BEPS. Other available information should be considered for indicators that taxable income in the jurisdiction should be higher. |
| There is a high value or high proportion of related party revenues in a particular jurisdiction | A high value or proportion of related party revenues might mean that even a small transfer pricing error could have a significant tax impact. | Groups may include entities that deal wholly or mainly with related parties for commercial reasons |
| The results in a jurisdiction deviate from potential comparables | Differences between a jurisdiction and the chosen comparable could be driven by BEPS | The chosen comparable may be unreliable, or there may be commercial factors to explain any difference |
| The results in a jurisdiction do not reflect market trends | Results may be being distorted by BEPS activity | Results may be being impacted by commercial considerations |
| There are jurisdictions with significant profits but little substantial activity | Profits may have been shifted away from the jurisdiction where the underlying economic activity is occurring | There may be commercial reasons why results in a jurisdiction may seem high relative to the activity measures in a CbC Report (e.g. due to tangible assets being heavily depreciated, or intangible assets that are not disclosed) |
| There are jurisdictions with significant profits but low levels of tax accrued | A low effective tax rate to indicate that a group is using BEPS to shelter taxable income | Non-BEPS reasons may explain low levels of tax accrued (e.g. accelerated tax depreciation) |
| There are jurisdictions with significant activities but low levels of profit (or losses) | Profits that are attributable to a jurisdiction may be being shifted to a jurisdiction where they are taxed more favourably | Some activities within a group may be more asset-intensive or staff-intensive than others (e.g. administrative functions may have a low profit per employee compared to the group) |
| A group has activities in jurisdictions which pose a BEPS risk | A group may be engaged in a known BEPS-related activity | There may be non-BEPS reasons to explain why a group has activities in a particular jurisdiction |





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CbC reporting Tax Risk Evaluation & Assessment Tool (TREAT): An Excel-based risk assessment tool provided at zero-cost that supports tax administrations with different levels of experience

| TREAT options | | | | | | | | | | |
|--|----------------|-------------|----------------|---------------|-------------|-------------|----------------|----------------|-------------|----------------|
| File TREAT options | | | | | | | | | | |
| A1 | | | | | | | | | | |
| Name of MNE group: Home | | | | | | | | | | |
| Start/end of reporting period: Start: not supplied End: 31-12-2016 | | | | | | | | | | |
| Revenues | | | | | | | | | | |
| Tax jurisdiction | | | | | | | | | | |
| Unrelated party | | | | | | | | | | |
| Related party | | | | | | | | | | |
| Total | | | | | | | | | | |
| Profit (loss) before income tax | | | | | | | | | | |
| Income tax paid (cash basis) | | | | | | | | | | |
| Income tax accrued - current year | | | | | | | | | | |
| Stated capital | | | | | | | | | | |
| Accumulated earnings | | | | | | | | | | |
| Number of employees | | | | | | | | | | |
| Tangible assets other than cash or equivalents | | | | | | | | | | |
| Total group numbers: | | | | | | | | | | |
| FRANCE | 11,025,747,915 | 914,143,469 | 12,505,412,995 | 1,785,351,724 | 305,061,960 | 194,813,680 | 62,370,218,995 | 12,517,117,240 | 112,719,788 | 14,862,580,254 |
| AFGHANISTAN | 4,158,180,101 | 252,461,374 | 5,108,701,868 | 511,907,188 | 45,016,025 | 88,704,832 | 16,750,150 | | | |
| ALGERIA | 5,465,091 | 130,091 | 5,517,181 | 1,106,120 | 44,912 | 261,801 | 188 | | | |
| ANGOLA | 24,795,879 | 5,344,480 | 30,689,892 | 6,309,505 | 1,099,141 | 1,201,139 | 2,887 | | | |
| ANTIGUA AND BARBUDA | 10 | 10 | 10 | 10 | 10 | 10 | 10 | | | |
| ARGENTINA | 1,799,278 | 2,168 | 1,801,446 | 107,132 | 85,488 | 111,119 | 188 | | | |
| AUSTRALIA | 1,888,644 | 401,567 | 2,814,962 | 212,169 | 34,509 | 81,768 | 78 | | | |
| AUSTRIA | 2 | 10 | 7 | 14 | 10 | 10 | 10 | | | |
| BAHRAIN | 1,308,205 | 200,995 | 1,417,210 | 89,348 | 1,111 | 17,889 | 184 | | | |
| BAHOLADOSH | 44,538,175 | 479,270 | 49,012,152 | 8,105,111 | 1,112,440 | 1,770,118 | 5,348 | | | |
| BARBADOS | 28,895,688 | 1,981,687 | 30,151,861 | 5,787,368 | 46,145 | 877,839 | 22,361 | | | |
| BEIRIN | 187,214,991 | 221,869,626 | 401,389,546 | 28,341,195 | 9,061,277 | 754,914 | 61,980,810 | | | |
| BHUTAN | 813,175,881 | 16,143,136 | 819,398,795 | 179,845,141 | 38,196,769 | 93,980,105 | 55,481 | | | |
| BOSNIA, HERZEGOVINA, STATE OF | 28,514,098 | 792,098 | 29,499,372 | 5,410,812 | 2,105,191 | 171,111 | 1,301 | | | |
| BOSNIA AND HERZEGOVINA | 28,514,098 | 792,098 | 29,499,372 | 5,410,812 | 2,105,191 | 171,111 | 1,301 | | | |
| BOTSWANA | 2,693,103 | 480,782 | 3,173,332 | 332,316 | 10 | 167,266 | 2,868 | | | |

Profit (loss) before tax

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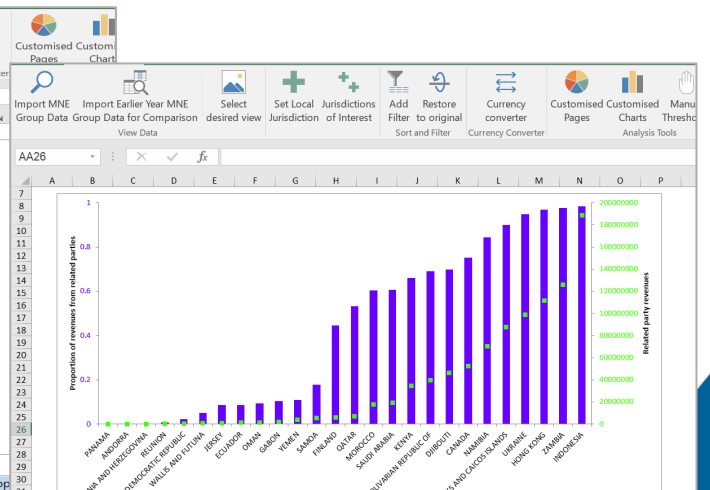
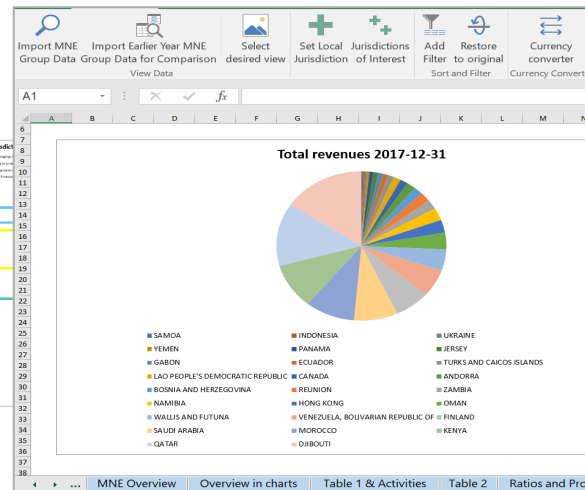
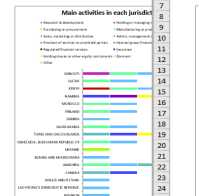
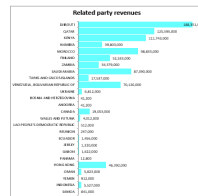
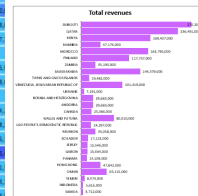
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Tools provided by the OECD to support the effective use of CbC reports

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CbC reporting Tax Risk Evaluation & Assessment Tool (TREAT): An Excel-based risk assessment tool provided at zero-cost that supports different levels of experience

Global Relations Programme: Online, virtual and in-person training events to support the effective use of CbC reports and wider risk assessment capacity

2023 Live GRP Workshops





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Global Relations Programme: Online, virtual and in-person training events to support the effective use of CbC reports and wider risk assessment capacity

CbC reporting risk assessment workshops: An opportunity to share approaches, experience and findings with other tax administrations





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CbC reporting Handbook on Effective Tax Risk Assessment: Describes how a CbC report can be used to detect these and other risk indicators

CbC reporting Tax Risk Evaluation & Assessment Tool (TREAT): An Excel-based risk assessment tool provided at zero-cost that supports different levels of experience

Global Relations Programme: Online, virtual and in-person training events to support the effective use of CbC reports and wider risk assessment capacity

CbC reporting risk assessment workshops: An opportunity to share approaches, experience and findings with other tax administrations

Tax Inspectors Without Borders (TIWB) CbC Reporting Pilot: Practical support in the use of real CbC reports from experienced specialists



The CbC reporting TREAT: Five benefits to a tax administration

First, presentation of a CbC report in a readable format

File Edit Format View Help

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File TREAT options

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| | A | B | C | D | E | F | G | H | I | J | K | L |
|----|---|--------------------------------|---------------------|-----------------|---------------|---------------------------------|------------------------------|-----------------------------------|----------------|----------------------|---------------------|--|
| 1 | | Name of MNE group: | Super Big MNE plc | Low | High | Notes: | | | | | | |
| 2 | | Start/End of reporting period: | Start: not supplied | End: 31-12-2022 | | | | | | | | |
| 3 | | | Revenues | | | | | | | | | |
| 4 | | Tax jurisdiction | Unrelated party | Related party | Total | Profit (loss) before income tax | Income tax paid (cash basis) | Income tax accrued - current year | Stated capital | Accumulated earnings | Number of employees | Tangible assets other than cash or equivalents |
| 5 | | Total group numbers: | 832,879,020 | 263,944,870 | 1,096,823,890 | 187,726,577 | 53,653,551 | 63,568,325 | 38,087,416 | 309,244,963 | 14,191 | 1,179,003,890 |
| 6 | | MALAYSIA | 142,617,970 | 61,705 | 142,679,675 | 402,847 | 85,997 | 83,351 | 6,964,134 | 3,913,533 | 2,500 | 153,817,000 |
| 7 | | AUSTRALIA | 7,417,970 | 22,917,050 | 30,335,020 | 20,100,234 | 58,997 | 5,683,351 | 96,134 | 23,533,000 | 64 | 3,153,810 |
| 8 | | BRAZIL | 112,617,970 | 94,917,050 | 207,535,020 | 40,023,455 | 17,858,997 | 18,883,351 | 2,264,134 | 30,023,533 | 625 | 315,817,000 |
| 9 | | CANADA | 5,617,970 | 1,705 | 5,619,675 | 400,691 | 188,997 | 183,351 | 746,134 | 3,123,533 | 18 | 31,538,010 |
| 10 | | CHILE | 2,117,970 | 5,617,970 | 7,735,940 | 940,234 | 78,589 | 88,833 | 6,964,134 | 39,353,300 | 500 | 10,153,810 |
| 11 | | CZECH REPUBLIC | 2,617,970 | 6,001,705 | 8,619,675 | 700,234 | 58,997 | 58,351 | 4,134 | 1,203,533 | 315 | 1,031,530 |
| 12 | | DENMARK | 9,617,970 | 8,900,160 | 18,518,130 | 1,400,487 | 785,997 | 780,351 | 69,134 | 40,123,533 | 520 | 413,153,810 |
| 13 | | GERMANY | 252,645,410 | 53,364,000 | 306,009,410 | 13,450,050 | 891,210 | 2,173,280 | 4,178 | 93,434,800 | 8,071 | 28,131,630 |
| 14 | | IRELAND | 617,970 | 40,891,705 | 41,509,675 | 38,400,234 | 3,858,997 | 3,853,351 | 6,964,134 | 393,533 | 46 | 153,810 |
| 15 | | NIGERIA | 72,617,970 | 1,705,000 | 74,322,970 | 25,400,234 | 12,858,997 | 12,803,351 | 6,934 | 9,123,533 | 176 | 11,538,170 |
| 16 | | SOUTH AFRICA | 55,517,970 | 21,891,705 | 77,409,675 | 17,850,234 | 7,858,997 | 8,883,351 | 69,000 | 3,003,533 | 450 | 103,153,810 |
| 17 | | SPAIN | 41,617,970 | 691,705 | 42,309,675 | 457,209 | 8,997 | 10,351 | 6,964,134 | 391,533 | 476 | 3,153,810 |
| 18 | | TUNISIA | 92,617,970 | 6,891,705 | 99,509,675 | 19,400,234 | 7,858,997 | 8,883,351 | 6,964,134 | 39,123,533 | 180 | 103,153,810 |
| 19 | | UNITED KINGDOM | 34,617,970 | 91,705 | 34,709,675 | 8,800,200 | 1,200,785 | 1,200,351 | 6,964 | 22,500,533 | 250 | 1,053,810 |



The CbC reporting TREAT: Five benefits to a tax administration

Second, automated summary of key facts

| TREAT options | | | | | | | | | | | |
|---------------|---|------------------------------|----------------------------|-------------------------------|--|------------------------------|---------------------------------|----------------|----------------------|---------------------|--------------------------------|
| A13 | | | | | | | | | | | |
| | | | | | | | | | | | |
| 1 | Name of MNE group: Super Big MNE plc | | | | | | | | | | |
| 2 | Start/End of reporting period: Start: not supplied End: 31-12-2022 | | | | | | | | | | |
| 3 | Ultimate Parent Entity/Reporting UPE: not supplied RE: not supplied | | | | | | | | | | |
| 4 | Currency used: EUR | | | | | | | | | | |
| 5 | File type: Primary Filing - New | | | | | | | | | | |
| 6 | Filed by MNE in: GERMANY | | | | | | | | | | |
| 7 | Notes: | | | | | | | | | | |
| 8 | | Unrelated party | Related party | Total | Profit (loss) before income tax | Income tax paid (cash basis) | Income tax accrued current year | Stated capital | Accumulated earnings | Number of employees | Tangible other than equivalent |
| 9 | Global numbers | 832,879,020 | 263,944,870 | 1,096,823,890 | 187,726,577 | 53,653,551 | 63,568,325 | 38,087,416 | 309,244,963 | 14,191 | 1,179,000 |
| 10 | Local jurisdiction numbers | 142,617,970 | 61,705 | 142,679,675 | 402,847 | 85,997 | 83,351 | 6,964,134 | 3,913,533 | 2,500 | 153,817 |
| 11 | Local numbers as a %age of global numbers | 17.12% | 0.02% | 13.01% | 0.21% | 0.16% | 0.13% | 18.28% | 1.27% | 17.62% | 13.05% |
| 12 | Aggregated numbers for JOIs | 13,035,940 | 22,918,755 | 35,954,695 | 20,500,925 | 247,394 | 5,866,702 | 842,268 | 26,656,533 | 82 | 34,691 |
| 13 | Agg. Number for JOIs as a %age of global numbers | 1.57% | 8.68% | 3.28% | 10.92% | 0.46% | 9.23% | 2.21% | 8.62% | 0.58% | 2.94% |
| 14 | Number of jurisdictions present in the report | 14 | | | | | | | | | |
| 15 | Number of constituent entities | 25 | | | | | | | | | |
| 16 | Number of potential dual resident entities | 0 | | | | | | | | | |
| 17 | Number of stateless entities | 0 | | | | | | | | | |
| 18 | Location of key activities | Research and Development (1) | Holding or managing IP (1) | Purchasing or procurement (2) | Admin., management or support services (1) | Internal Group Finance (2) | Insurance (2) | | | | |
| 19 | | SOUTH AFRICA (1) | IRELAND (1) | GERMANY (1) | CZECH REPUBLIC (1) | BRAZIL (1) | DENMARK (1) | | | | |
| 20 | | | | SPAIN (1) | | GERMANY (1) | TUNISIA (1) | | | | |



The CbC reporting TREAT: Five benefits to a tax administration

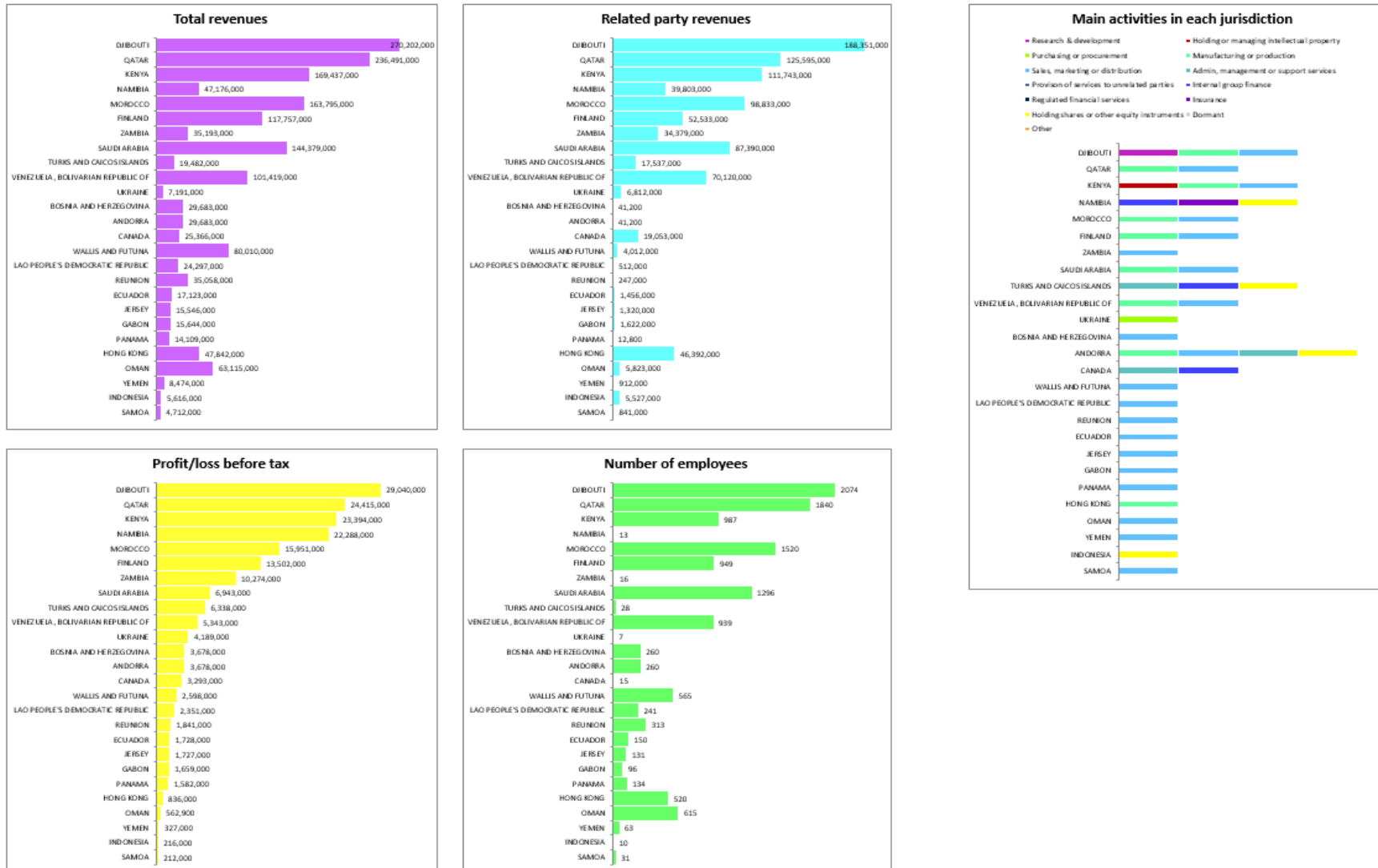
Third, detection of common errors

| TREAT options | | | | | | | | | | | |
|---------------|--|--|---------------------------------------|--|------------------|--|--|--------|--|--|--|
| A1 | | | | | | | | | | | |
| | | | | | | | | | | | |
| 1 | Name of MNE group: | | Super Big MNE plc | | | | | Notes: | | | |
| 2 | Start/End of reporting period: | | Start: not supplied | | End: 31-12-2022 | | | | | | |
| 3 | Ultimate Parent Entity/Reporting | | UPE: not supplied | | RE: not supplied | | | | | | |
| 4 | Currency used: | | EUR | | | | | | | | |
| 5 | File type: | | Primary Filing - New | | | | | | | | |
| 6 | Filed by MNE in: | | GERMANY | | | | | | | | |
| 7 | Number of jurisdictions | | 14 | | | | | | | | |
| 8 | Number of constituent entities | | 25 | | | | | | | | |
| 9 | Number of unique TINs | | 24 | | | | | | | | |
| 10 | Number of non-unique TINs | | 1 | | | | | | | | |
| 11 | Number of "blank" TIN fields | | 0 | | | | | | | | |
| 12 | Number of NOTIN entries | | 0 | | | | | | | | |
| 13 | Jurisdictions appearing in Table 2 data but not Table 1 data (or vice versa) | | - | | | | | | | | |
| 14 | Number of unique currency codes | | 1 | | EUR | | | | | | |
| 15 | Jurisdictions where total revenue is not equal to related party plus | | (Related + Unrelated party revenue) - | | | | | | | | |
| 16 | Zero financials but active entities | | No | | - | | | | | | |
| 17 | Financials but no active entities | | No | | | | | | | | |
| 18 | Less than two jurisdictions included | | No | | | | | | | | |
| 19 | Entities with activity "other" and no additional information supplied | | 0 | | | | | | | | |
| 20 | Jurisdictions with negative revenues | | - | | | | | | | | |
| 21 | Total revenue below 750 mn. or above 100 bn. | | No | | | | | | | | |
| 22 | More than 10,000 employed in any jurisdiction | | No | | | | | | | | |
| 23 | More than 200,000 total employed in all jurisdictions | | No | | | | | | | | |



The CbC reporting TREAT: Five benefits to a tax administration

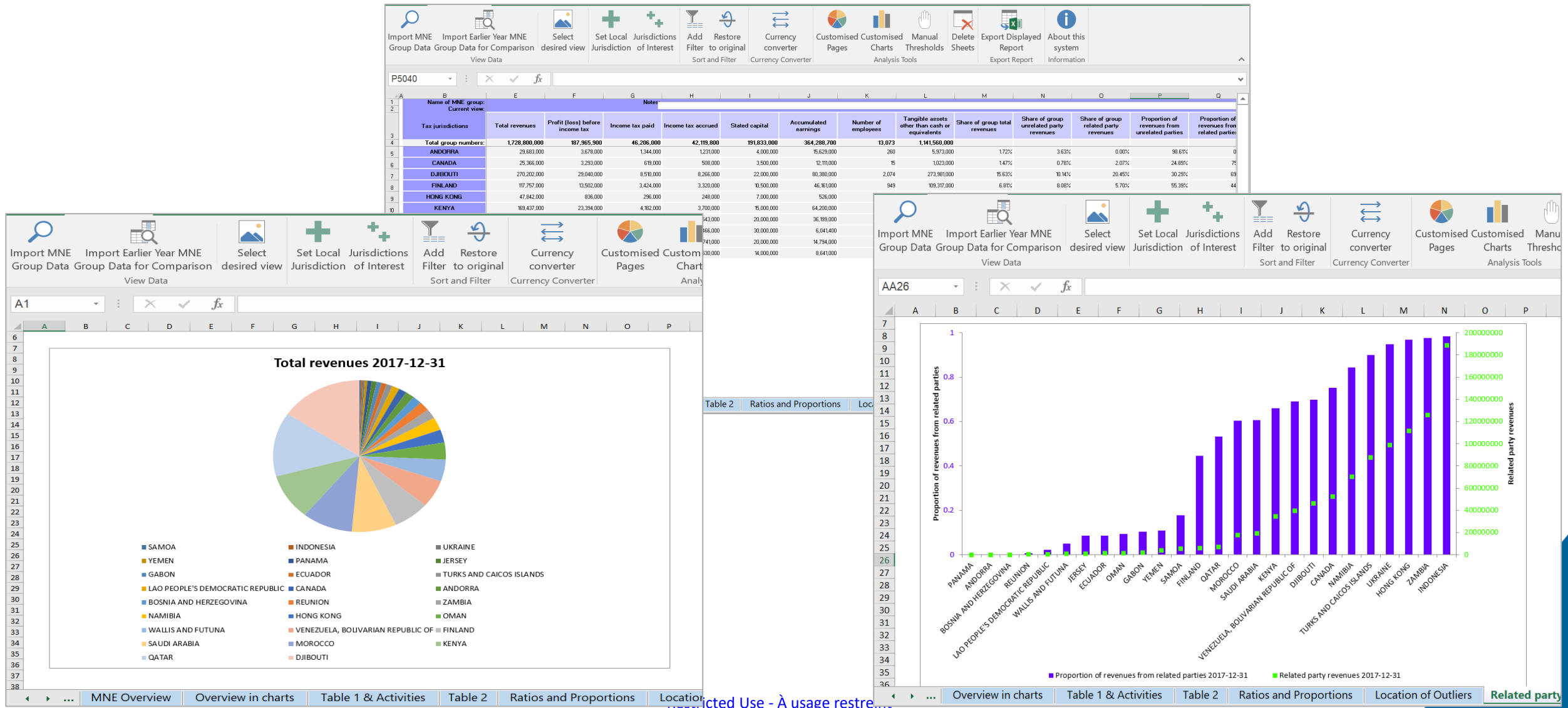
Fourth, immediate presentation of most commonly used analyses





The CbC reporting TREAT: Five benefits to a tax administration

Fifth, user-defined charts for presentation of specific data





STATUS OF COUNTRY-BY- COUNTRY REPORTING IMPLEMENTATION



CbC Reporting – current status of implementation IF as a whole compared with low/middle income members*

**120 IF members (82%)
have introduced a CbC
reporting filing
obligation**

**105 IF members (71%)
have signed the CbC
MCAA**

**89 IF members (61%)
have been approved
for the reciprocal
automatic exchange of
information (AEOI)**

**80 IF members (54%)
are in a position to
receive CbC reports on
foreign headed MNEs
under AEOI**

**54 low/middle income
IF members (72%)
have introduced a CbC
reporting filing
obligation**

**40 low/middle income
IF members (53%)
have signed the CbC
MCAA**

**32 low/middle income
IF members (43%)
have been approved
for the reciprocal
automatic exchange of
information (AEOI)**

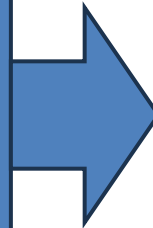
**29 low/middle income
IF members (37%) are
in a position to receive
CbC reports on foreign
headed MNEs under
AEOI**

* Of 147 IF members, 75 (51%) are low- or middle-income economies according to the World Bank Atlas method and the DAC list



A phased implementation within the IF

First, it was critical that jurisdictions where MNEs were headquartered implemented rules to require the filing of CbC reports



This has been achieved and we are confident that CbC reports on substantially all in-scope MNEs are now available for exchange



Now, it is critical that jurisdictions which could benefit from data in CbC reports are able to receive them and use them



BUT many low- and middle-income jurisdictions face challenges that are still not fully understood





PURPOSE OF THE PEER REVIEW



What is the purpose of the Action 13 CbC reporting Peer Review?

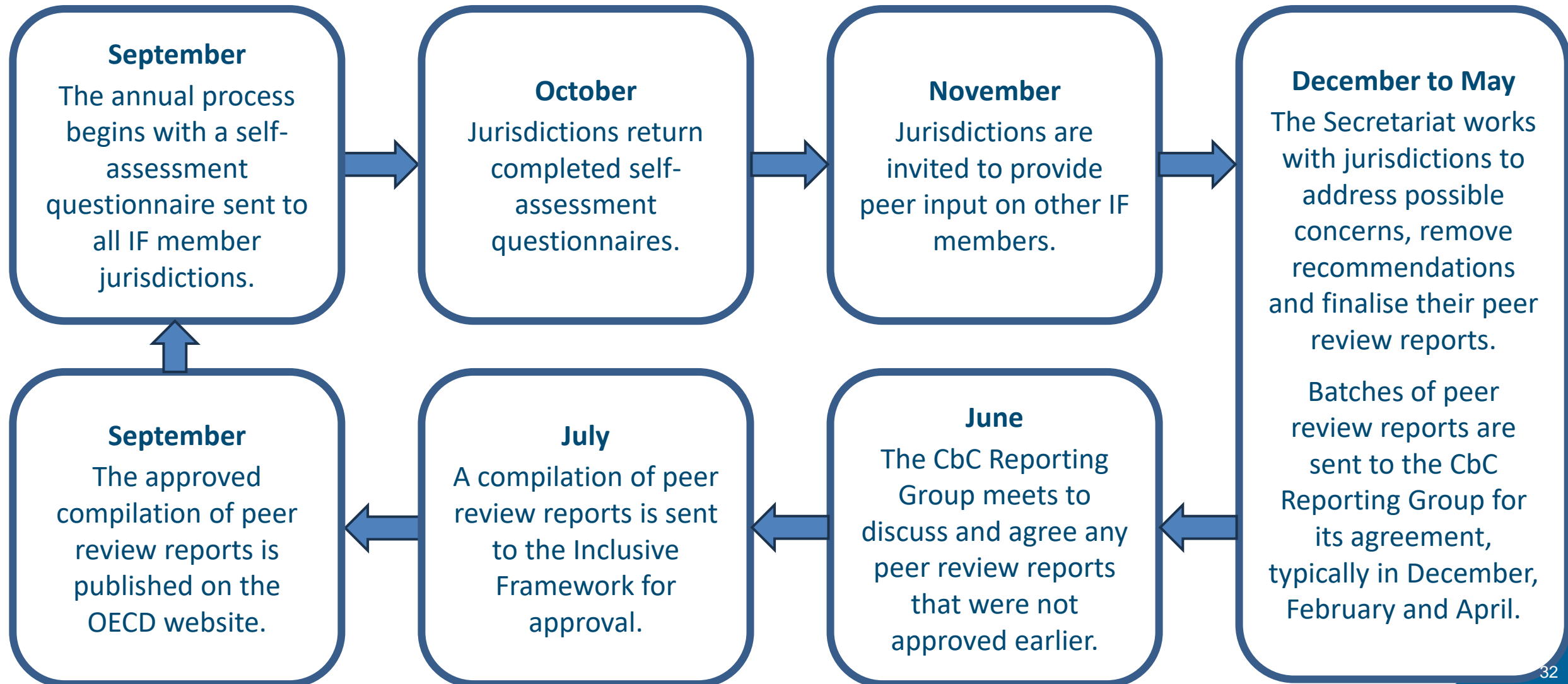
- Allows for early detection of areas where additional support may be needed
- Helps ensure the international exchange process operates smoothly
- Enables jurisdictions to resolve issues, through the peer input process
- Gives assurance to jurisdictions that confidential data is safeguarded



HOW DOES THE PEER REVIEW WORK?



The peer review process





HOW THE SECRETARIAT CAN ASSIST



How the Secretariat can assist

- Develop an action plan in conjunction with your staff, to outline and agree the key items to be addressed and the order of priority
- Review of draft legislation, secondary guidance, and other such legislative items to ensure compliance with the Minimum Standard and avoid recommendations in the peer report
- Assistance in drafting exchange of information processes and procedures for tax administration staff to ensure compliance with the Minimum Standard
- Assistance in drafting appropriate use processes and procedures for tax administration staff to ensure compliance with the Minimum Standard
- Assistance with signing and submitting the MCAA to ensure exchange relationships are in effect
- Coordination with other OECD teams, e.g. the Global Forum, to schedule confidentiality assessment, or the EOI team, for assistance with CTS and exchanging data
- Provision of training, technical assistance and support in all areas relating to Action 13 and CbC reporting
- Once the Minimum Standard is implemented, training and support in using the data contained in a CbC Report for high level risk assessment



Questions and comments



THANK YOU

For more information:

 Contact us by e-mail: ctp.contact@oecd.org

 Visit our public website: www.oecd.org/tax

 Sign-up to our tax news alerts: <http://oe.cd/taxnews-signup>