

Country by Country Reporting

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Action 13 requires the OECD to:

“Develop rules regarding transfer pricing documentation to enhance transparency for tax administrations taking into account compliance costs for business. The rules will include a requirement that MNEs provide information on their global allocation of income, economic activity and taxes paid according to a common template”

Country by Country Reporting – Chronology

- First discussed by WP6 in November 2013
- Discussion draft published in January
- Public consultation in March
- Revised government draft in April, further consultation in May
- Due to complete by September 2014

Country by Country reporting – Public Draft Contents

- Individual entities by country
- Business activities
- Revenues
- Earnings before tax
- Cash tax
- Withholding tax
- Capital and earnings
- Number of employees
- Employee expense
- Tangible assets
- Royalties, interest and service fees paid and received