



File your Country-by-Country report 2019 and notification for financial year 2020 before 31 December 2020

As of January 1, 2016 Transfer Pricing documentation requirements are in place for Dutch entities who are part of an international group with a consolidated group revenue of at least 750 million euro. One of these requirements is the filing of a Country-by-Country (CbC) report with the Dutch Tax Authorities. If another group entity is filing the report with its local tax authorities and the information can be exchanged, only a notification requirement remains. The CbC report 2019 and the notification for financial year 2020 must be submitted before 31 December 2020.

Country-by-Country report 2019

The annual CbC report must be submitted by the tax authorities in the country of tax residence of the entity. The entity who will file the CbC report on behalf of the group, must notify the tax authorities. After notification, the CbC report 2019 should be with the tax authorities by December 31, 2020 latest. The requirements the CbC report should meet, are described in detail in the Regulation published December 30, 2015 by the Deputy Minister of Finance.

Country-by-Country notification 2020

Further to the eventual requirement to file a CbC report 2019 there might be an obligation to file a CbC notification 2020 as well. This obligation applies to the Dutch entities of the multinational company who has to file the CbC report. The notification must state which entity will file the CbC report in which country. For completeness sake, please be informed that the deadline for filing your notification is the last day of the financial year of the ultimate parent company. For financial years starting January 1, 2020 this implies **December 31, 2020** as deadline.

How to notify the Dutch Tax Authorities

The 2020 notification should be done electronically by entering the required information into a portal provided by the Dutch Tax Authorities. The information to be provided is the same as had to be filed for previous years. The portal – which is available in English as well – can be reached by: www.gegevensportaal.net/cbc/aanmelden

Consequences of non-timely filing the 2019 report and/or 2020 notification

In case you do not file the 2019 report and/or the 2020 notification timely, you can – in case of intentional act or gross negligence – be confronted with a fine up to 870,000 euro and/or up to 4 years of imprisonment.

Baker Tilly can assist you in the presentation of your CbC report 2019 and/or CbCr notification 2020

The advisors of the Transfer Pricing Desk have experience in this field of expertise and as such are available to discuss the above issues in more detail and support you in the process of complying with these legal requirements.

For more information and/or assistance, please contact our Transfer Pricing desk by sending a message to transferpricing@bakertilly.nl. You will be contacted as soon as possible.

Disclaimer

The content of the above information is intended as a general informative memorandum. Baker Tilly (Netherlands) N.V. therefore accepts no liability for actions taken based on this document.

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