

CBC-P FILING DEADLINE APPROACHING

As of 4 April 2017, the Exchange of Tax Information with Other Countries Act (Article 86(1)) requires taxpayers to notify the Head of National Revenue Administration ("HNRA") about where (which country or territory) the CBC-R report will be filed and by which group entity.

The first such notification, covering a reporting financial year commencing after 31 December 2015 but before 1 January 2017, is due to be filed to HNRA within 10 months from the end of that year. For taxpayers whose reporting financial years coincide with the calendar year, the due date falls on **31 October 2017**. In each subsequent year, the due date is the last day of the financial year.

The Finance Ministry ("FM") are currently working on an e-form for the notification, called CBC-P. Form CBC-P will have each taxpayer indicate whether the CBC-R must be filed in Poland by the taxpayer (as Group parent, as a designated entity or as part of "secondary reporting") or by some other group member. In that latter case, the taxpayer will have to disclose the particulars of that reporting entity (full name and address, tax ID) and the country or territory in which the CBC-R report will be filed.

We will keep you up-to-date on further actions taken by MF when preparing the CBC-P format. If this issue pertains to your business and you are interested in our assistance, please contact your WTS&SAJA consultant or our office.

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