

SCOPE OF DISCLOSURES TO BE MADE IN FORM CBC-P

Our Newsletter 41/2017 brought you news of the upcoming deadline for the filing of CBC-P notification.

The notification is to be filed by those taxpayers who belong to corporate groups required to provide Country-by-Country Reporting, being those with consolidated revenues of above EUR 750M.

The CBC-P for a reporting financial year beginning after 31 December 2015 but before 1 January 2017 should be filed with the Head of National Revenue Administration within 10 months from the end of that year. For taxpayers whose reporting financial years coincide with the calendar year, the due date will fall on **31 October 2017**.

The Finance Ministry say that CBC-P is to be filed electronically but the work on the standard e-form is still ongoing. We learnt unofficially from the Ministry's Department of Key Entities that taxpayers will be able to send in the notifications using traditional mail. Below we set out the scope of disclosures to be made in CBC-P:

1. Details of the filing entity:
 - entity name,
 - tax identification number NIP,
 - registered office address (country, state/province, county, municipality, street name and number, apartment number, city, post code, post office name).

2. Where the filing entity also files CBC-R, it will indicate in its CBC-P form whether it is filing the CBC-R as:
 - Group parent entity,
 - designated entity,
 - other designated entity as part of "secondary reporting".

3. Where the filing entity is not the CBC-R reporting entity, it will state the details of the reporting entity and the country or territory where the CBC-R will be filed. The disclosures to be made are as follows:

for a domestic entity:

- entity name,
- tax identification number NIP,
- registered office address (country, state/province, county, municipality, street name and number, apartment number, city, post code, post office name).

for foreign entity:

- entity name,
- tax identification number or, if it has none, some other identification number,
- registered office address (country, post code, city, street name and number, apartment number).

We will keep you up-to-date on further actions taken by the Finance Ministry in relation to CBC-P.

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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