



Uruguay issues resolution on CbC reporting requirements

Global Transfer Pricing Alert 2019-001

Uruguay's tax authorities on 4 January issued a resolution that confirms filing and notification deadlines regarding country-by-country (CbC) reporting. Resolution 94/2019 supplements legislation enacted in January 2017 and Decree 353/018, published in October 2018.

The legislation allows the Uruguayan tax authorities to request CbC reports for fiscal years commencing from 1 January 2017 from domestic taxpayers that are members of large multinational entity (MNE) groups.

The filing requirement applies to Uruguayan taxpayers that are either the ultimate parent entity of a large MNE group or a subsidiary of a foreign-parented group.

However, an exception applies to local subsidiaries when the group files a CbC report in a country that has a competent authority arrangement in force with Uruguay that allows for the exchange of CbC reports for the relevant fiscal year. When the exception does not apply and the local subsidiary is required to file a CbC report in Uruguay, Resolution 94/2019 provides that such reports will not be exchanged with tax authorities in other jurisdictions.

The law also allows the tax authorities to request the submission of a master file by taxpayers that belong to MNE groups, irrespective of their size.

A large MNE group is defined as one with total consolidated income in the year prior to that to which the CbC report

relates of at least EUR 750 million or its equivalent in another currency.

The decree also sets out the notification requirements for a local subsidiary of a large MNE group. They must provide the following to the tax authorities annually:

- Name and country of tax residence of the entity that will file the CbC report for the group;
- Name and country of tax residence of the group's ultimate parent entity; and
- Names of other group members resident in Uruguay.

Resolution 94/2019 clarifies that the notification must be submitted via the tax authorities' website during the group's relevant fiscal year, and that annual notifications are required, even if there are no changes during the year. As an exception, the notification deadline for fiscal years ending between 31 December 2017 and 28 February 2019 is 31 March 2019.

Decree 353/018 specified that the CbC report and master file were to be filed within 12 months of the relevant fiscal year-end, subject to further regulations to be issued by the tax authorities. Because the necessary filing procedures were not implemented before December 2018, Resolution 94/2019 granted an extension for filing the CbC report for fiscal years ending between 31 December 2017 and 30 November 2018 to 15 months after the year end. The CbC report must be submitted in xml format, with the standard codification.

The resolution does not include a deadline or specific requirement for filing the master file. Further regulations may be issued, or the tax authorities may request the master file from individual taxpayers on a case-by-case basis.

Contacts

Gonzalo Lucas (Montevideo)

golucas@deloitte.com

Alejandra Barrancos (Montevideo)

abarrancos@deloitte.com

Felipe Prado (Montevideo)

fprado@deloitte.com

[Back to top](#)

Useful links

Resources

- [Arm's length standard](#)
- [Transfer pricing alerts](#)

Get Connected

- [Deloitte tax@hand](mailto:Deloitte_tax@hand)
- [Join Dbriefs](#)
- [Follow @Deloitte Tax](#)
- www.deloitte.com/tax

[Back to top](#)



Get in touch



Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"), its network of member firms, and their related entities. DTTL and each of its member firms are legally separate and independent entities. DTTL (also referred to as "Deloitte Global") does not provide services to clients. Please see www.deloitte.com/about to learn more about our global network of member firms.

Deloitte provides audit & assurance, consulting, financial advisory, risk advisory, tax and related services to public and private clients spanning multiple industries. Deloitte serves four out of five Fortune Global 500® companies through a globally connected network of member firms in more than 150 countries and territories bringing world-class capabilities, insights, and high-quality service to address clients' most complex business challenges. To learn more about how Deloitte's approximately 245,000 professionals make an impact that matters, please connect with us on [Facebook](#), [LinkedIn](#), or [Twitter](#).

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited, its member firms, or their related entities (collectively, the "Deloitte Network") is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser. No entity in the Deloitte Network shall be responsible for any loss whatsoever sustained by any person who relies on this communication.

© 2019. For information, contact Deloitte Touche Tohmatsu Limited.

To no longer receive emails about this topic please send a return email to the sender with the word "Unsubscribe" in the subject line.