

Luxembourg Tax Alert

CBC Reporting Newsletter

Luxembourg CBC Law published and first notification deadline extended!

27 December 2016

As part of BEPS Action 13, the Luxembourg law implementing Country-by-Country Reporting (CbC Report) was published in [the official gazette](#) today. In parallel, the Luxembourg tax authorities published [guidelines](#) and [FAQ](#) (which should be updated regularly) on their website to clarify the modalities of the application of this law.

Today, the Luxembourg tax authorities have confirmed that the deadline for the notification for FY 2016 is extended until 31 March 2017 and as such no penalty for late notification shall apply until this date.

As mentioned in our previous [tax alert](#), the law includes a notification requirement before the end of 2016 (if the MNE GROUP FYE is Dec 31), to be made by any Lux tax resident subsidiary or Luxembourg branch identifying the Group's reporting entity that will file the CbC Report in 2017. In theory, an absence of notification - or even a late notification - might entail penalties of a maximum of €250,000 per Luxembourg Constituent entity.

Further guidance was provided on the e-notification system already available in English on the webportal [guichet.lu](#) ("MyGuichet").

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