



Global Tax Reset
Transfer Pricing Documentation
Summary

January 2017



Overview



The Global Tax Reset – Transfer Pricing Documentation Summary (“Guide”) compiles essential information regarding the implementation of BEPS Action 13 items (i.e., country-by-country reporting, master file, local file) in 51 jurisdictions around the world. This guide has been reviewed and updated as of 31 January 2017.


As used in this guide, please note the following interpretations:

1. **Secondary filing** generally refers to a local filing obligation imposed on resident entities in a multinational enterprise (“MNE”) group when the jurisdiction does not receive the country-by-country (“CbC”) report via automatic exchange from the parent or surrogate reporting entity’s jurisdiction. Some countries that have secondary filing requirements may provide exceptions for FY2016 (that is, resident entities do not need to submit a CbC report for FY2016).
2. **Local file** is defined as either an OECD local file (i.e., prepared in accordance with Annex II to Chapter V of the revised OECD Transfer Pricing Guidelines) or transfer pricing documentation prepared under local regulations. Some countries also have disclosure requirements that do not directly relate to the OECD local file.
3. **Substantially complies** means that the tax authority will accept a report that meets OECD content guidelines, and the report will likely meet penalty protection requirements. However, it is anticipated that additional information will be required to be provided upon a transfer pricing audit. In addition, some countries require transfer pricing reports to be prepared in local languages. Such language requirements are not considered in this summary when determining whether an OECD master file and local file can provide local documentation compliance.
4. With respect to master file or local file/documentation **filing requirements**, “Submit” refers to a requirement to submit either all or, in certain countries, only parts of the documentation; “Provides” refers to having to provide the documentation upon request; “Contemporaneous” refers to having to prepare documentation by a certain date (usually by the time of filing annual tax returns). For certain countries, only certain types of documentation need to be prepared contemporaneously (e.g., documentation for self-adjustment, penalty protection or for extraordinary business transactions); these countries are listed as having contemporaneous requirements. Certain countries have rules whereby documentation needs to be prepared by a tax return due date that is earlier than the submission due date for penalty avoidance; these countries are listed as having “Contemporaneous + Submit” requirements.
5. Some countries provide a monetary threshold for filing or preparation of the master file or local file/documentation. For the purpose of this document, it is assumed any filing or preparation thresholds have been met.
6. There may be multiple due dates for certain countries applicable for different parts of the master file or local file/documentation. The earliest due date that could apply is listed.

This guide is a summary and indicative only, based on Deloitte’s understanding of the position at the time of publication. It should not be relied upon for making business decisions, and we recommend you consult a transfer pricing specialist before taking any action. The transfer pricing specialists in Deloitte member firms around the world have the knowledge and experience to help you on your journey. For more information regarding transfer pricing issues in specific countries, and about Deloitte’s tax practice in those jurisdictions, please contact your usual Deloitte transfer pricing adviser or one of the listed contacts.




















	Country-by-Country (“CbC”) Report						Master File (“MF”)			Local File (“LF”)/ Documentation		MF & LF/ Documentation			
	Status of rules	First effective year starting	Notification requirement	Report due date (months/years after year-end)	Secondary filing requirement (exceptions in some countries)	Penalties	Status of rules	OECD MF required	First effective year starting	Status of rules	New rules effective starting	Does OECD MF + LF provide local dox compliance?	Filing requirement	For countries with submission requirement: submission due date (months/years after year-end)	Penalties
Argentina 		TBD		TBD		TBD			N/A		Existing rules apply	Substantially complies	Submit	8 months	
Australia 		1 Jan 2016		12 months	Filing				1 Jan 2016		1 Jan 2016	Requires additional information	Submit for MF; Contemporaneous + Provide for LF	12 months	
Austria 		1 Jan 2016; 1 Jan 2017 for secondary filing		12 months	Filing				1 Jan 2016		1 Jan 2016	Completely complies	Provide		
Belgium 		1 Jan 2016		12 months	Filing				1 Jan 2016		1 Jan 2016	Requires additional information	Provide		
Brazil 		1 Jan 2016		By tax return due date	Filing		None to date				Existing rules apply	Does not follow OECD	Does not follow OECD	Does not follow OECD	Does not follow OECD
Bulgaria 		1 Jan 2016; 1 Jan 2017 for secondary filing		12 months	Filing				TBD		TBD	TBD	Provide		
Canada 		1 Jan 2016		12 months	Filing		None to date				Existing rules apply	Substantially complies	Contemporaneous + Provide		
Chile 		1 Jan 2016		6 months			None to date				Existing rules apply	Substantially complies	Provide		
China 		1 Jan 2016		By tax return due date	Provide				1 Jan 2016		1 Jan 2016	Requires additional information	Contemporaneous + Provide		
Colombia 		1 Jan 2016		TBD					TBD		Existing rules apply	Substantially complies	Submit	7 months	

 Announced Final Proposed Yes No

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Cyprus 		1 Jan 2016		TBD	Filing		None to date		None to date						
Czech Republic 		1 Jan 2016		12 months	Filing		None to date				Existing rules apply	Substantially complies	Provide		
Denmark 		1 Jan 2016; 1 Jan 2017 for secondary filing		12 months	Filing				1 Jan 2017; FY2016 is optional		1 Jan 2017; FY 2016 is optional/ existing rules	Completely complies	Contemporaneous + Provide		
Estonia 		1 Jan 2016		12 months	Filing			Existing rules apply	Already required		Existing rules apply	Substantially complies	Provide		
Finland 		1 Jan 2016		12 months	Filing				1 Jan 2017		1 Jan 2017	Completely complies	Contemporaneous + Provide		
France 		1 Jan 2016		12 months	Filing			Existing rules apply	Already required		Existing rules apply	Substantially complies	Contemporaneous + Provide		
Germany 		1 Jan 2016; 1 Jan 2017 for secondary filing		12 months	Filing				1 Jan 2017		Existing rules apply; revised rules expected for 2017	Requires additional information	Contemporaneous + Provide		
Greece 	None to date							Existing rules apply	Already required		Existing rules apply	Substantially complies	Contemporaneous + Provide		
Hong Kong 		1 Jan 2018; voluntary filing possible for FY before 2018		12 months	Filing				TBD		TBD	TBD	Provide		
Hungary 	None to date						None to date				Existing rules apply	Substantially complies	Contemporaneous + Provide		
India 		1 Apr 2016		By tax return due date	Filing			TBD	TBD		Existing rules apply	Requires additional information	Contemporaneous + Provide		

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Indonesia 		1 Jan 2016		12 months	Filing				1 Jan 2016		1 Jan 2016	Requires additional information	Contemporaneous + Provide		
Ireland 		1 Jan 2016		12 months	Filing		None to date				Existing rules apply	Substantially complies	Contemporaneous + Provide		
Israel 		1 Jan 2016		12 months	TBD		None to date				Existing rules apply	Substantially complies	Provide		
Italy 		1 Jan 2016		TBD	Filing			Existing rules apply	Already required		Existing rules apply	Requires additional information	Contemporaneous + Provide		
Japan 		1 Apr 2016		12 months	Filing				1 Apr 2016		1 Apr 2016 for MF; 1 Apr 2017 for LF	Substantially complies	Submit for MF; Provide for LF	12 months	
Jersey 		1 Jan 2016		12 months	Filing		None to date			None to date					
Korea 		1 Jan 2016		12 months	Filing				1 Jan 2016		1 Jan 2016	Substantially complies	Contemporaneous + Submit	12 months	
Luxembourg 		1 Jan 2016		12 months	Filing		None to date				Existing rules apply	Substantially complies	Provide		
Malaysia 		1 Jan 2017		12 months	Filing		None to date				Existing rules apply	Requires additional information	Contemporaneous + Provide		
Malta 		1 Jan 2016		9 months	Filing		None to date			None to date					
Mexico 		1 Jan 2016		12 months	Provide				1 Jan 2016		1 Jan 2016	Requires additional information	Contemporaneous + Provide		
Netherlands 		1 Jan 2016		12 months	Filing				1 Jan 2016		1 Jan 2016	Substantially complies	Contemporaneous + Provide		

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New Zealand 		1 Jan 2016		12 months					1 Jan 2016		1 Jan 2016	Completely complies	Provide		
Norway 		1 Jan 2016		12 months	Filing		None to date				Existing rules apply	Substantially complies	Provide		
Peru 		1 Jan 2017		TBD	Filing				1 Jan 2017		1 Jan 2016 for LF; 1 Jan 2017 for MF	Substantially complies	Contemporaneous + Submit	6 months	TBD
Poland 	Final; secondary filing rules proposed	1 Jan 2016; 1 Jan 2017 for secondary filing		12 months	Filing				1 Jan 2017		1 Jan 2017	Requires additional information	Contemporaneous + Provide		
Portugal 		1 Jan 2016		12 months	Filing		None to date				Existing rules apply	Substantially complies	Contemporaneous + Provide		
Russia 		1 Jan 2017; voluntary filing possible for FY before 2017		12 months	Provide				1 Jan 2017		1 Jan 2017	Requires additional information	Provide		
Singapore 		1 Jan 2017		12 months			None to date				Existing rules apply	Substantially complies	Contemporaneous + Provide		
Slovakia 		1 Jan 2016		12 months	Filing			Existing rules apply	Already required		Existing rules apply	Requires additional information	Provide		
Slovenia 		1 Jan 2016		12 months				Existing rules apply	Already required		Existing rules apply	Substantially complies	Contemporaneous + Provide		
South Africa 		1 Jan 2016		12 months	Filing				1 Oct 2016		1 Oct 2016	Requires additional information	Submit	12 months	
Spain 		1 Jan 2016		12 months	Filing				1 Jan 2016		1 Jan 2016	Substantially complies	Contemporaneous + Provide		
Sweden 		1 Jan 2016		12 months	Filing				1 Apr 2017		1 Apr 2017	Completely complies	Contemporaneous + Provide		

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Switzerland 		1 Jan 2018; voluntary filing possible for FY before 2018	Yes for Swiss UPE and SPE; currently no for other Swiss CE	12 months	Provide	✓	None to date				Existing rules apply	Completely complies	Provide		✗
Taiwan 		TBD	✗	TBD	✗	TBD	None to date				Existing rules apply	Substantially complies	Contemporaneous + Provide		✓
Turkey 		1 Jan 2016	✗	12 months	Filing	✓		✓	1 Jan 2016		Existing rules apply until new rules effective	Substantially complies	Contemporaneous + Provide		✓
United Kingdom 		1 Jan 2016	✓	12 months	Filing	✓	None to date				Existing rules apply	Completely complies	Contemporaneous + Provide		✓
United States 		1 July 2016; voluntary filing allowed for years beginning prior to 1 July 2016	✗	By tax return due date; extended to 12 months after FYE for early reporting periods	✗	✓	None to date				Existing rules apply	Substantially complies	Contemporaneous + Provide		✓
Uruguay 		1 Jan 2017	✓	TBD	Filing	✓		✓	TBD		Existing rules apply	Requires additional information	Contemporaneous + Submit	9 months	✓

This guide contains information available as of 31 January 2017. It is subject to change without notice.

Abbreviations:

UPE: Ultimate Parent Entity

SPE: Surrogate Parent Entity

CE: Constituent Entity (other than a UPE or SPE)

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