Action 13: Country-by-Country Reporting (CbCR)

Colleges and Universities

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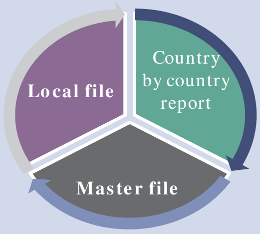
Agenda

- Action 13 Background and Overview
- Application to Colleges and Universities
- Roadmap

Action 13 Overview and Background

The OECD's Approach



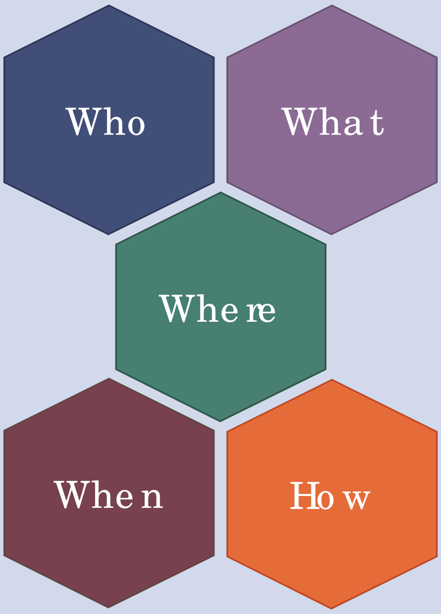
Objectives

- Provide a high-level overview in order to place the MNE group's transfer pricing practices in their global economic, legal, financial and tax context
- Provide assurance that the taxpayer has complied with the arm's length principle in its material transfer pricing positions affecting a specific jurisdiction
- Support high level transfer pricing risk assessment

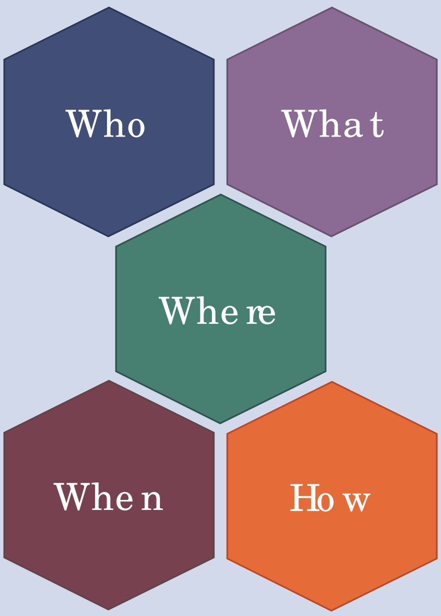
Three-Tiered Approach

- ***Master file: 'blueprint' of MNE's business***
- Local file: detailed information on specific intercompany transactions
- Country-by-country report: aggregated information on revenues, profits, taxes and indicators of economic activity

Filing and notifications: US regulations



Filing and notifications: US regulations



Every ultimate parent entity of a US multinational enterprise (MNE) group with annual revenue for the immediately preceding reporting period > $850 million.

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