Bloomberg Tax

Jersey

Summary of CbC Reporting and Transfer Pricing Documentation Rules

For more detailed guidance and the latest updates, please see the Bloomberg Tax BEPS Tracker.

Country-by-Country Report

- Effective Date: For accounting periods beginning on or after January 1, 2016.
- *Filing Threshold:* MNEs with annual consolidated group revenue equal to or exceeding €750 million in the previous 12 month accounting period.
- <u>Local Filing:</u> A Jersey resident entity that is not the ultimate parent entity of the MNE group may be required to file the CbC report directly with the Jersey tax authorities if certain conditions are met.
- Information Reported: Consistent with OECD guidance.
- Forms/Filing Instructions:
 - CbC Notification of Reporting Entity: submitted via the Jersey AEOI portal.
 - CbC Report: submitted via the Jersey AEOI portal.
- Deadline for Filing Notification of Reporting Entity: By the end of the relevant accounting period.
- <u>Deadline for Filing CbC Report:</u> Within 12 months after the end of the relevant accounting period.
- <u>Penalties:</u> A penalty of £300 may apply for failure to comply with obligation under the CbC regulations (additional daily default penalties may apply if the non-compliance continues). Additional penalties up to £3,000 may apply for deliberately providing inaccurate information.
- Exchange of Information
 - MCAA CbC: signed.
 - U.S. CAA CbC: signed.
 - Other CAA CbC: Guernsey, Isle of Man, U.K., U.S.

For a schedule of CbC report and CbC notification deadlines (by country), please see <u>CbC Reporting</u> Deadlines.

Master File

There are no transfer pricing rules in Jersey.

Local File

There are no transfer pricing rules in Jersey.