

Guernsey

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.
- Local Filing: A Guernsey resident entity that is not the ultimate parent entity of the MNE group may be required to file the CbC report under certain condition.
- Information Reported: Consistent with OECD guidance.
- Forms/Filing Instructions (see Bloomberg Tax International Tax Forms database):
 - CbC Notification of Reporting Entity: reported on the company tax return.
 - CbC Report: submitted via the Information Gateway Online Reporter (IGOR).
- Deadline for Filing Notification of Reporting Entity: For constituent entities, a notification is reported on the company tax return. For ultimate parent entities or surrogate parent entities, a notification is due no later than 6 months after the last day of the reporting year.
- Deadline for Filing CbC Report: Within 12 months after the end of the accounting period covered by the report.
- Penalties: Penalties apply for failure to comply with the CbC reporting requirements, including failure to notify the tax authorities of the reporting entity.
- Exchange of Information
 - MCAA CbC: signed.
 - U.S. CAA CbC: signed.
 - Other CAA CbC: Bermuda, Cayman Islands, Gibraltar, Isle of Man, Jersey, Turks and Caicos Islands, U.K.

For a schedule of CbC report and CbC notification deadlines (by country), please see [CbC Reporting Deadlines](#).

Master File

There are no OECD Master File requirements in Guernsey.

Local File

There are no OECD Local File requirements in Guernsey.