

Isle of Man

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: Fiscal years beginning on or after January 1, 2017.
- Filing Threshold: Resident MNEs with annual consolidated group revenue exceeding €750 million in the previous fiscal year.
- Local Filing: An entity resident in the Isle of Man may be required to file a CbC report if certain conditions are met.
- Information Reported: Consistent with OECD guidance.
- Forms/Filing Instructions
 - CbC Notification Filed by Constituent Entity: filed via the constituent entity's income tax return.
 - CbC Registration Filed by Reporting Entity: filed electronically via the Income Tax Division's Online Information Provider Service.
 - CbC Report: filed electronically via the Income Tax Division's Online Information Provider Service.
- Deadline for Filing Notification of Reporting Entity:
 - CbC Notification Filed by Constituent Entity: no later than 12 months and a day after the last day of the reporting year of the MNE group
 - CbC Registration Filed by Reporting Entity: no later than 6 months following the last day of the first reporting fiscal year (one-time filing, unless a change in information).
- Deadline for Filing CbC Report: No later than 12 months and a day after the last day of the reporting year of the MNE group.
- Penalties: A penalty of £300 may apply for failure to comply with any 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: Anguilla, Bermuda, British Virgin Islands, Cayman Islands, Guernsey, 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 transfer pricing rules in the Isle of Man.

Local File

There are no transfer pricing rules in the Isle of Man.