

Liechtenstein

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: Liechtenstein MNEs with annual consolidated group revenue of more than CHF 900 million in the previous year.
- Voluntary Filing: Available for financial years beginning from January 1, 2016 (and before January 1, 2017).
- Local Filing: A Liechtenstein constituent entity is required to file a CbC report if certain conditions are met.
- Information Reported: Consistent with OECD guidance.
- Language: German or English.
- Forms/Filing Instructions:
 - CbC Notification of Reporting Entity: there is no notification requirement; however, a Liechtenstein reporting entity must register with the tax administration by the end of the first reporting tax period. This can be done by sending an informal letter to the tax administration.
 - CbC Report: filed electronically via the [Tax Administration website](#).
- Deadline for Filing CbC Report: Within 12 months after the end of the reporting tax year.
- Penalties: Penalties up to CHF 250,000 may apply for non-compliance.
- Exchange of Information:
 - MCAA CbC: signed.
 - U.S. CAA CbC: signed.

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

Master File

- Effective Date: Fiscal years beginning on or after January 1, 2018.
- Filing Threshold: Liechtenstein taxpayers that are part of a group with annual consolidated revenue of more than CHF 900 million.
- Information Reported: Consistent with OECD guidance.
- Language: German or English.
- Deadline for Submission: Submitted within 60 days of a request by the tax authority.
- Penalties: Penalties for non-compliance may apply.

Local File

- Effective Date: Fiscal years beginning on or after January 1, 2018.¹
- Filing Threshold: Liechtenstein taxpayers that are part of a group with annual consolidated revenue of more than CHF 900 million. Cross-border transactions to be documented include (i) purchases and

sales of goods exceeding CHF 1 million per related party and year and (ii) other transactions exceeding CHF 250,000 per category, related party, and year.

- Information Reported: Consistent with OECD guidance.
- Language: German or English.
- Deadline for Submission: Submitted within 60 days of a request by the tax authority.
- Penalties: Penalties for non-compliance may apply.

Transfer Pricing Documentation (for Large Companies)

- Effective Date: Fiscal years beginning on or after January 1, 2018.¹
- Filing Threshold: Liechtenstein taxpayers not required to file a master file or local file (i.e., not meeting the consolidated group revenue threshold of CHF 900 million) with (i) total assets exceeding CHF 25.9 million; (ii) net revenue in the previous year exceeding CHF 51.8 million; and (iii) an annual average of more than 250 full time employees. Cross-border transactions to be documented include (i) purchases and sales of goods exceeding CHF 500,000 per related party and year and (ii) other transactions exceeding CHF 125,000 per category, related party, and year.
- Information Reported: In general, less than what is required under the master file or local file requirements.
- Language: German or English.
- Deadline for Submission: Submitted within 60 days of a request by the tax authority.
- Penalties: Penalties for non-compliance may apply.

Simplified Documentation (for Small and Medium-Sized Enterprises)

Small and medium-sized enterprises (i.e., entities that do not qualify as large companies or that are not required to file a master file or local file) must document compliance with the arm's length principle through appropriate documents. This requirement also applies to domestic transactions. The relevant documentation must be submitted to the Tax Administration upon request.

Notes:

¹ A taxpayer in Liechtenstein engaged in material transactions with associated entities and permanent establishments is generally required to document its transfer prices from January 1, 2017; however, the tax ordinance establishing the specific transfer pricing documentation requirements is effective from January 1, 2018.