

Lithuania

Summary of CbC Reporting and Transfer Pricing Documentation Rules

Country-by-Country Report [[DAC 4: Legal Framework webpage](#)]

- Effective Date: Fiscal years beginning on or after January 1, 2016.
- Filing Threshold: MNEs with consolidated group revenue of at least €750 million for the previous year.
- Local Filing: A Lithuanian entity may be required to file a CbC report if certain conditions are met.
- Information Reported: Generally consistent with OECD guidance.
- Forms/Filing Instructions:
 - CbC Notification of Reporting Entity: Filed via regular mail, email, or online (see [DAC 4: Other Relevant Information webpage](#)).
 - CbC Report – Filed electronically to the State Tax Inspectorate.
- Deadline for Filing Notification of Reporting Entity: By the last day of the reporting year.
- Deadline for Filing CbC Report: Within 12 months of the last day of the reporting year.
- Penalties: Penalties may apply for non-compliance.
- Exchange of CbC Reports:
 - MCAA CbC: signed.
 - EU Directive 2016/881: enacted.
 - U.S. CAA CbC: signed.

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

Public Country-by-Country Report [[Law No. XIV-2020](#) and [Order No. 1K-233](#)]

- Effective Date: Financial years beginning on or after June 22, 2024.
- Reporting Threshold:
 - Lithuanian MNEs (or a Lithuanian stand-alone company) with consolidated revenue exceeding €750 million in each of the last two consecutive financial years (and active in at least one other tax jurisdiction).
 - Non-EU MNEs with a “medium-sized” or “large”¹ subsidiary in Lithuania with consolidated revenue exceeding €750 million in each of the last two consecutive financial years (or a non-EU company with a branch in Lithuania and the revenue of the Lithuanian branch exceeds €8 million in each of the last two consecutive financial years).
 - Lithuanian subsidiaries or branches established for the sole purpose of circumventing the EU public CbC reporting requirements.

Consistent with the EU directive, companies established in Lithuania that are already subject to separate reporting under EU Directive 2013/36 are exempt from this reporting obligation.

¹ [Company Accountability Law of the Republic of Lithuania](#), see Art. 4. Micro, small, medium and large enterprises.

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- Information Reported and Presentation of Information: The information reported, as well as the presentation of the information, is consistent with the EU directive. A common template and electronic reporting format will be provided.

Consistent with the EU directive, the information reported includes the name of the company, financial year in question and currency used; a brief description of the nature of the business activities; number of full-time employees; net revenue; profit or loss before income tax; income tax accrued; income tax paid; and accumulated earnings. In addition, the report will provide explanations for any significant discrepancies in the amount of income tax accrued and the amount of income tax paid. Information reported in the CbC Report in accordance with Order No. VA-47 (implementing EU Directive 2016/881) may be submitted instead.

In addition, the data will be disclosed (i) separately for each EU member state; (ii) separately for each country listed on the EU list of non-cooperative jurisdictions (i.e., “blacklist”) on March 1 of the relevant financial year or listed on the “grey list” on March 1 of the relevant financial year and on March 1 of the previous financial year; and (iii) aggregated for the rest of the world.

- Publication and Accessibility: In general, the report must be submitted to the administrator of the Lithuanian Register of Legal Entities and published on the company’s website for at least five consecutive years. The report must be available to the public, free of charge, in a machine-readable electronic format, and in at least one of the official languages of the EU.
- Publication Deadline: The report must be published within 12 months from the last day of the relevant financial year.
- Deferral: MNEs can temporarily omit certain information if the disclosure of such information could seriously harm the commercial position of the companies to which the report refers. Any omission must be clearly indicated in the report with the justification for its omission. The omission does not apply to information related to tax jurisdictions included in the EU list of non-cooperative jurisdictions (i.e., blacklist or grey list). The omitted information must be included in a subsequent report no later than 5 years after the omission.
- Audit Requirement: If an audit report of the financial statements of the reporting entity is required, it must include a statement of whether a CbC report was required to be published (for the preceding financial year) and, if so, if the report was published in accordance with the rules.

Master File [\[Order No. 1K-470\]](#)

- Effective Date: Fiscal years beginning on or after January 1, 2019.
- Filing Threshold: Lithuanian resident entities (and foreign entities operating in Lithuania through a permanent establishment) with revenue exceeding €15 million in the previous year, if the entity is part of an MNE group.
- Information Reported: Generally consistent with OECD guidance.
- Language: Not specified. The tax authorities may request a translation into Lithuanian.
- Deadline for Preparation/Submission: Prepared by the 15th day of the sixth month after the end of the relevant tax period and submitted to the tax authorities within 30 days of a request.
- Penalties: Penalties ranging from €1,820 to €5,590 may apply for non-compliance. Penalties for a repeated non-compliance range from €3,770 to €6,000.

Local File [\[Order No. 1K-470\]](#)

- Effective Date: Fiscal years beginning on or after January 1, 2019.

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- Filing Threshold: Lithuanian resident entities (and foreign entities operating in Lithuania through a permanent establishment) with revenue exceeding €3 million in the previous year. However, the local file must be prepared for financial companies and credit institutions (regulated by the Law on Financial Institutions) and insurance companies (regulated by the Law on Insurance), regardless of the revenue.

In general, an entity is not required to prepare transfer pricing documentation if a transaction (or multiple similar transactions) with the same related party do not exceed €90,000 during the year.

- Information Reported: Generally consistent with OECD guidance.
- Language: Not specified. The tax authorities may request a translation into Lithuanian.
- Deadline for Preparation/Submission: Prepared by the 15th day of the sixth month after the end of the relevant tax period and submitted to the tax authorities within 30 days of a request.
- Penalties: Penalties ranging from €1,820 to €5,590 may apply for non-compliance. Penalties for a repeated non-compliance range from €3,770 to €6,000.

Transfer Pricing Disclosure

[Form FR0528](#), Statement of Transactions Between Associates, is filed together with the corporate income tax return if the annual value of the taxpayer's related party transactions (including loans) exceeds €90,000. Form FR0438, Report on Controlled and Controlling Entities and Persons, may also be required to be filed together with the corporate income tax return.