

## Madagascar

### Summary of CbC Reporting and Transfer Pricing Documentation Rules

#### Country-by-Country Report

There are no OECD CbC reporting requirements in Madagascar.

#### Master File

- Effective Date: Tax years ending on or after December 31, 2020.
- Scope: Taxpayers with cross-border financial or commercial intercompany transactions, regardless of amount.
- Language: One of the official languages (i.e., French or Malagasy).
- Deadline for Submission: Filed electronically at the same time as the income statement and the corporate income tax return (e.g., by May 15<sup>th</sup> of the following year for calendar year-end taxpayers or by November 15<sup>th</sup> for June 30<sup>th</sup> year-end taxpayers or by the 15<sup>th</sup> day of the fourth month following other year-ends). However, the due dates for the 2020 and 2021 financial years are postponed to a later date to be determined by the tax administration (once training sessions are complete).
- Maintenance: Documentation must be maintained for 10 years.
- Penalties: Failure to produce transfer pricing documentation may result in penalties of AR 10,000,000.

#### Local File

- Effective Date: Tax years ending on or after December 31, 2020.
- Scope: Taxpayers with cross-border financial or commercial intercompany transactions, regardless of amount.
- Language: One of the official languages (i.e., French or Malagasy).
- Deadline for Submission: Filed electronically at the same time as the income statement and the corporate income tax return (e.g., by May 15<sup>th</sup> of the following year for calendar year-end taxpayers or by November 15<sup>th</sup> for June 30<sup>th</sup> year-end taxpayers or by the 15<sup>th</sup> day of the fourth month following other year-ends). However, the due dates for the 2020 and 2021 financial years are postponed to a later date to be determined by the tax administration (once training sessions are complete).
- Maintenance: Documentation must be maintained for 10 years.
- Penalties: Failure to produce transfer pricing documentation may result in penalties of AR 10,000,000.