Bloomberg Tax

Monaco

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, 2018.
- *Filing Threshold*: MNEs headquartered in Monaco with consolidated group revenue equal to or exceeding €750 million in the preceding year.
- *Local Filing*: Not required.
- Information Reported: Generally consistent with OECD guidance.
- Forms/Filing Instructions (see Bloomberg Tax International Tax Forms database):
 - CbC Notification of Reporting Entity: A model of the "Declaration of a Constituent Entity of a Multinational Enterprise Group, Tax Resident of Monaco" is provided on the government website.
 - CbC Report: Filed electronically via the Automatic Exchange of Information Portal.
- <u>Deadline for Filing Notification of Reporting Entity</u>: By the last day of the reporting fiscal year.
- <u>Deadline for Filing CbC Report</u>: Within 12 months after the last day of the reporting fiscal year.
- <u>Penalties</u>: Penalties up to $\in 100,000$ may apply for noncompliance with the CbC rules. The failure to file the notification of reporting entity may result in a penalty of $\in 750$.
- 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 <u>CbC Reporting</u> <u>Deadlines</u>.

Master File

There are no OECD Master File requirements in Monaco.

Local File

There are no OECD Local File requirements in Monaco.