

Morocco

Summary of CbC Reporting and Transfer Pricing Documentation Rules

Country-by-Country Report

- Effective Date: Fiscal years beginning on or after January 1, 2021.
- Filing Threshold: MNEs resident in Morocco with annual consolidated revenue of at least MAD 8.1225 billion in the previous year.
- Local Filing: A Moroccan constituent entity may be required to file a CbC report if certain conditions are met; however, in December 2022, the local filing requirement was temporarily suspended.
- Information Reported: Generally consistent with OECD guidance.
- Forms/Filing Instructions (see [CbC Guide](#)):
 - CbC Report: Submitted electronically via the [Directorate General of Taxes SIMPL Portal](#).
- Deadline for Filing Notification of Reporting Entity: Constituent entities resident in Morocco designated as a Surrogate Parent Entity (SPE) must notify the tax authorities by the last day of the reporting year.
- Deadline for Filing CbC Report: Within 12 months after the end of the reporting year.
- Penalties: Penalties of MAD 500,000 may apply for non-compliance.
- Exchange of Information:
 - MCAA 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, 2021.
- Filing Threshold: Companies with turnover equal to or greater than MAD 50 million or total gross assets at the end of the relevant financial year equal to or greater than MAD 50 million.
- Deadline for Submission: Within 30 days of a written request by the tax authority.
- Penalties: Penalties equal to 0.5% of the relevant controlled transactions (with a minimum penalty of MAD 200,000 per year) may apply for non-compliance.

Local File

- Effective Date: Fiscal years beginning on or after January 1, 2021.
- Filing Threshold: Companies with turnover equal to or greater than MAD 50 million or total gross assets at the end of the relevant financial year equal to or greater than MAD 50 million.
- Deadline for Submission: Within 30 days of a written request by the tax authority.
- Penalties: Penalties equal to 0.5% of the relevant controlled transactions (with a minimum penalty of MAD 200,000 per year) may apply for non-compliance.

The 2019 Finance Bill introduced transfer pricing documentation requirements for tax audit procedures commencing after January 1, 2020. Entities taxable in Morocco (with a direct or indirect relationship

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with entities located outside Morocco) must provide the tax authorities with documentation to justify the arm's length nature of their transfer pricing within 30 days of a written request. The documentation includes information on group activities and policies, as well as information on specific related party transactions. Information sent to the tax authorities is typically in the French language.