

## Senegal

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

#### Country-by-Country Report

- Effective Date: Fiscal years beginning on or after January 1, 2018.
- Filing Threshold: MNEs resident in Senegal with consolidated group revenue equal to or exceeding XOF 492 billion in the previous year.
- Local Filing: A Senegalese constituent entity is required to file a CbC report if certain conditions are met. However, on September 17, 2025, the tax authorities announced the suspension of local filing obligations for the 2023 and 2024 financial years.
- Information Reported: Generally consistent with OECD guidance.
- Deadline for Filing Notification of Reporting Entity: To be determined.
- Deadline for Filing CbC Report: Filed electronically, within 12 months after the reporting year-end.
- Penalties: A penalty of XOF 25 million may apply for failure to timely file the CbC report.
- 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, 2018.
- Filing Threshold: Entities with annual turnover or gross assets equal to or exceeding XOF 5 billion (or entities holding or held by companies meeting this threshold).
- Information Reported: Generally consistent with OECD guidance.
- Language: French (tax authorities can request a French translation, if provided in English).
- Deadline for Submission: Submitted upon request of the tax authorities at the beginning of a tax audit. During a tax audit, taxpayers typically have 20 days after a request, to make the information available.
- Penalties: Penalties equal to 0.5% of the value of improperly documented related-party transactions may apply for non-compliance.

#### Local File

- Effective Date: Fiscal years beginning on or after January 1, 2018.
- Filing Threshold: Entities with annual turnover or gross assets equal to or exceeding XOF 5 billion (or entities holding or held by companies meeting this threshold).
- Information Reported: Generally consistent with OECD guidance.
- Language: French (tax authorities can request a French translation, if provided in English).
- Deadline for Submission: Submitted upon request of the tax authorities at the beginning of a tax audit. During a tax audit, taxpayers typically have 20 days after a request, to make the information available.

- Penalties: Penalties equal to 0.5% of the value of improperly documented related-party transactions may apply for non-compliance.

## **Transfer Pricing Return**

From 2017, an annual simplified transfer pricing return must be filed by entities with annual turnover or gross assets equal to or exceeding XOF 5 billion (or entities holding or held by companies meeting this threshold). The transfer pricing return contains (i) general information on the group (including a description of the group's activities, intangible assets held, and transfer pricing policy) and (ii) specific information on the reporting entity (including a description of activities, summary of related party transactions, information on loans, and information on pricing agreements or tax rulings). The transfer pricing return must be prepared in French and filed with the annual corporate income tax return (i.e., by April 30<sup>th</sup>). A penalty of XOF 10 million may apply for failure to timely file the transfer pricing return (additional penalties may apply for filing an incomplete or inaccurate transfer pricing return).