

Slovakia

Summary of CbC Reporting and Transfer Pricing Documentation Rules

Country-by-Country Report

- Effective Date: Financial years beginning on or after January 1, 2016.
- Filing Threshold: Slovakian MNEs with annual consolidated group revenue equal to or exceeding €750 million in the previous financial year.
- Local Filing: For financial years beginning on or after January 1, 2017, a Slovakian entity may be required to file a CbC report if certain conditions are met.
- Information Reported: Generally consistent with OECD guidance.
- Language: Slovak language.
- Forms/Filing Information (see Bloomberg Tax International Tax Forms database):
 - CbC Notification of Reporting Entity: [Notification DAC4/CbCR](#) filed electronically via the portal of the Financial Directorate.
 - CbC Report: Report DAC4/CbCR filed electronically via the portal of the Financial Directorate.
- Deadline for Filing Notification of Reporting Entity: No later than the deadline for filing the income tax return for the reporting year (i.e., 3 months after year-end).
- Deadline for Filing CbC Report: Within 12 months after the end of the financial year.
- Penalties: Penalties up to €10,000 may apply for non-compliance. Penalties up to €3,000 may apply for failure to file the notification of the reporting entity.
- 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 [CbC Reporting Deadlines](#).

Public Country-by-Country Report (Act on Accounting (Article 21, Articles 21a-f))

- Effective Date: Accounting periods beginning on or after June 22, 2024.
- Reporting Threshold:
 - Slovakian MNEs with consolidated revenue exceeding €750 million in each of the last two consecutive financial years.
 - Non-EU MNEs with a qualifying subsidiary or branch in Slovakia with consolidated revenue exceeding €750 million in each of the last two consecutive financial years.

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

- Information Reported and Presentation of Information: Details to be provided in a subsequent decree.
- Publication and Accessibility: In general, the report must be published and made available to the public (for five years) on the company's website and filed in the Commercial Register.
- Audit Requirement: Consistent with the EU directive, the audit report must include a statement of whether a CbC report was required to be published and, if so, if the report was published in accordance with the rules.
- Penalties: Specific penalty provisions have not been introduced.

Master File and Local File – Full Documentation ([Guidance No. MF/020061/2022-724](#))

[Full documentation consists of general documentation (i.e., master file) and specific documentation (i.e., local file)]

- **Effective Date:** Fiscal years beginning on or after January 1, 2018.
- **Filing Threshold:** The value of a cross-border controlled transaction (or group of transactions) exceeds €10 million for the tax period.

In addition, full documentation is required for taxpayers with significant cross-border controlled transactions that prepare IFRS financial statements or that transact with related parties that are resident in a country with no income tax treaty or tax information exchange agreement with the Slovak Republic; as well as for taxpayers that have applied for an APA; initiated a mutual agreement procedure; requested a secondary adjustment under a tax treaty; or applied for tax relief during the tax period.

- **Exceptions:** Documentation is not required for transactions that do not affect the income tax base of the taxpayer in the relevant tax period; however, for tax periods beginning after December 31, 2022, there is an exception for credits and loans, which must be documented.

For tax periods beginning after December 31, 2022, the transfer pricing rules generally do not apply to insignificant transactions, which are transactions with a value up to €10,000 or a loan with principal not exceeding €50,000.

- **Information Reported:** Generally consistent with OECD guidance.
For tax periods beginning after December 31, 2022, additional information may be required for permanent establishments. If the permanent establishment claims financial costs as a tax deductible expense, the documentation must also include a description of the methods of allocating capital and costs of financing.
- **Language:** Slovak language. From January 1, 2023, taxpayers may submit transfer pricing documentation in a foreign language (previously taxpayers were required to file a request with the tax administration to submit documentation in a foreign language). If the tax administration subsequently requests a translation to Slovak, it must be submitted within 15 days of the request.
- **Deadline for Submission:** Submitted within 15 days of a request by the tax administration.
- **Penalties:** Penalties up to €3,000 may apply for non-compliance (penalties may be assessed repeatedly).

Basic Documentation ([Guidance No. MF/020061/2022-724](#))

- **Effective Date:** Fiscal years beginning on or after January 1, 2018.
- **Filing Threshold:** The value of a cross-border controlled transaction (or group of transactions) exceeds €1 million for the tax period or taxpayers with total revenue that exceeds €8 million for the tax period.

In addition, standard documentation is required for taxpayers with significant domestic controlled transactions that have applied for tax relief during the tax period or insignificant transactions with related parties that are resident in a country with no income tax treaty or tax information exchange agreement with the Slovak Republic.

- **Exceptions:** Documentation is not required for transactions that do not affect the income tax base of the taxpayer in the relevant tax period; however, for tax periods beginning after December 31, 2022, there is an exception for credits and loans, which must be documented.

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For tax periods beginning after December 31, 2022, the transfer pricing rules generally do not apply to insignificant transactions, which are transactions with a value up to €10,000 or a loan with principal not exceeding €50,000.

- **Information Reported:** More limited information, consisting of general documentation and specific documentation.

For tax periods beginning after December 31, 2022, additional information may be required for permanent establishments. If the permanent establishment claims financial costs as a tax deductible expense, the documentation must also include a description of the methods of allocating capital and costs of financing.

- **Language:** Slovak language. From January 1, 2023, taxpayers may submit transfer pricing documentation in a foreign language (previously taxpayers were required to file a request with the tax administration to submit documentation in a foreign language). If the tax administration subsequently requests a translation to Slovak, it must be submitted within 15 days of the request.
- **Deadline for Submission:** Submitted within 15 days of a request by the tax administration.
- **Penalties:** Penalties up to €3,000 may apply for non-compliance (penalties may be assessed repeatedly).

Abbreviated (or Simplified) Documentation ([Guidance No. MF/020061/2022-724](#))

Abbreviated documentation applies to certain low-volume or low-risk transactions. The abbreviated documentation must be provided in the [format](#) provided by the tax administration.

For tax years beginning after December 31, 2022, taxpayers must prepare abbreviated documentation for significant controlled transactions (or groups of transactions) in a period in which the taxpayer reported a tax loss; applied for a tax loss deduction; or did not apply the tax rate according to § 15 letter a) point 2 or letter b) point 1a of the Income Tax Act (thus, the rules apply to all taxpayers with turnover for the previous 12 months of at least €49,790).

Tax Return Disclosure

Taxpayers must report certain summarized information regarding related party transactions in the corporate income tax return.