

Zambia

Summary of CbC Reporting and Transfer Pricing Documentation Rules

Country-by-Country Report

- Effective Date: Tax years ending on or after December 31, 2021.
- Filing Threshold: MNEs resident in Zambia with consolidated group revenue of ZMW 4.795 billion or more in the previous accounting year [Threshold applies to tax years ending on or after December 31, 2022. Previously the regulations provided for two currencies: €750 million or ZMW 4.795 billion].
- Local Filing: A Zambian constituent entity may be required to file a CbC report if certain conditions are met.
- Information Reported: Generally consistent with OECD guidance.
- Forms/Filing Instructions:
 - CbC Report: The CbC form (template provided in the regulations) is submitted manually or electronically to the Commissioner-General.
- Deadline for Filing Notification of Reporting Entity: No later than the last day of the relevant reporting accounting year.
- Deadline for Filing CbC Report: No later than 12 months after the last day of the reporting accounting year.
- Exchange of Information:
 - MCAA CbC: not yet signed.

For a schedule of CbC report and CbC notification deadlines (by country), please see [CbC Reporting Deadlines](#).

Master File

Zambia does not have OECD Master File requirements.

Local File

Zambia does not have OECD Master File requirements.

Transfer Pricing Documentation

From tax year 2018, entities that engage in controlled transactions must annually prepare contemporaneous transfer pricing documentation (i.e., prepared by the due date of the annual income tax return). The rules are generally in line with the OECD transfer pricing guidelines (regarding Master File and Local File) and the UN transfer pricing manual. The documentation must be provided within 30 days of a request by the tax authorities and must be retained for 10 years. Entities who are not members of a multinational group and whose turnover does not exceed ZMK 50 million (ZMK 20 million for tax years ending before December 31, 2021) are generally exempt from the transfer pricing documentation rules (i.e., all multinational entities are subject to the documentation rules). Penalties may apply for non-compliance.

Transfer Pricing Disclosure

Companies must disclose information on their related party transactions in the corporate income tax return.