

GUIDANCE NOTE
P&F No. 10/2022

Income Tax (Country-by-Country Reporting) Act, 2021-27

FREQUENTLY ASKED QUESTIONS

COUNTRY-BY-COUNTRY REPORTING

September 2022

General Query	Response
<p>Which Unit is responsible for international tax compliance matters?</p>	<p>The Global Relations Unit is responsible for matters of international tax compliance. This include -</p> <ul style="list-style-type: none"> ➤ Exchange of Information ➤ Tax Residency Applications ➤ Mutual Agreement Procedures ➤ Monitoring the OECD/G20 BEPS Actions
<p>Where do I send registered mail?</p>	<p>Address your correspondence to:</p> <p>Revenue Commissioner Global Relations Unit Barbados Revenue Authority 4th Floor, Weymouth Corporate Centre Roebuck Street ST. MICHAEL</p>
<p>Who can I contact if I have a question?</p>	<p>Contact the Global Relations Unit</p> <p>General Queries Email: compauth@bra.gov.bb</p> <p>Tax Residency Applications Email: taxrulings@bra.gov.bb</p> <p>The team will respond to the query within 2 business days.</p>

Country-by-Country Reporting (CbCR)	
CbCR Query	Response
<p>What is Country-by-Country Reporting ("CbCR")?</p>	<p>Country-by-Country Reporting (CbCR) is part of the OECD's Base Erosion and Profit Shifting (BEPS) Action Plan 13. In essence, large multinational enterprises (MNE) groups are required to submit an annual return to Revenue Authorities that breaks down key elements of the financial statements by jurisdiction.</p>
<p>What is the purpose of CbCR?</p>	<p>CbCR is part of a suite of international measures aimed at combating tax avoidance. It achieves this through comprehensive exchanges of information between participating jurisdictions.</p>

Country-by-Country Reporting (CbCR)	
CbCR Query	Response
What legislation governs the CbCR?	<p>Income Tax (Country by Country Reporting) Act, 2021-27 ("CbC Act")</p> <p>Please visit the Authority's website at Acts & Regulations (bra.gov.bb) to view the legislation.</p>
Is there any guidance on CbCR?	<p>To date, the Authority has issued the following guidance notes with reference to CbCR -</p> <ul style="list-style-type: none"> • Appropriate Use of CbC Information • Jurisdiction List of Exchange Partners • Impact Currency fluctuations • CbC Notification Form • CbC AEOI Web Portal <p>Please visit the Authority's website at https://bra.gov.bb/News/Guidance-Notes/ to view the guidance notes.</p>
What is a reporting entity?	<p>A reporting entity refers to the entity filing a CbC Report with the Authority. This may include the Ultimate Parent Entity, Surrogate Parent Entity or a Constituent Entity. Generally the reporting entity is the ultimate parent entity, however, the Ultimate Parent Entity may appoint a Surrogate Parent Entity to file the CbC Report.</p> <p>Where either the Ultimate or Surrogate Parent Entity is filing a CbC Report in another jurisdiction but Barbados cannot access this report due to varying factors, one resident constituent entity in Barbados will be required to file the CbC Report on the behalf of the MNE Group.</p> <p>Upon submission of the CbC notification, the Authority will be able to advise accordingly, if necessary.</p> <p>Where a CbC Report is filed by the Ultimate or Surrogate Parent Entity it will be exchanged with Barbados' exchange partners.</p>

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Who is exempted from CbCR?	An MNE Group which has total consolidated group revenue of less than USD\$850,000,000 during the fiscal year immediately preceding the reporting fiscal year as reflected in its consolidated financial statements for that preceding fiscal year is exempted from CbCR.
What data is captured in the CbC Report?	The CbC Report includes the following – <ol style="list-style-type: none"> 1. MNE Group details 2. List of the Constituent Entities, address, residency, TIN, business activity, 3. Unrelated revenue, related revenue, profit/loss, taxes paid, tax accrued, capital, number of employees and assets.
Is CbCR limited to financial institutions like FATCA and CRS?	No, CbCR applies to all MNE Groups that meet the threshold regardless of their business activity.
When is the first reporting fiscal year?	The first reporting fiscal year is any fiscal year beginning on or after 1st January 2021.
When is the due date for filing a CbC Report?	<p>CbC Reports are due no later than 12 months after the end of the fiscal year.</p> <p>E.g. 1. Company X has a fiscal year of January 1, 2021, to December 31, 2021. Company X is required to file a CbC Report with the Authority on or before December 31, 2022.</p> <p>E.g. 2. Company Y has a fiscal year of September 1, 2021, to August 31, 2022. Company Y is required to file a CbC Report with the Authority on or before August 31, 2023.</p> <p>E.g. 3. Company Z has a fiscal year of April 1, 2020, to March 31, 2021. The fiscal year of April 1, 2020, to March 31, 2021, is not the first reporting fiscal year for CbC purposes. Company Z is required to file a CbC Report with the Authority on or before March 31, 2023, for the fiscal year April 1, 2021, to March 31, 2022.</p>

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Is a CbC Report required where a company is incorporated after January 1, 2021, with a fiscal year ending before December 31?	No, because the fiscal year relates to that of the Ultimate Parent Entity.
Will the Authority be granting any filing extensions for the CbC Reports?	No filing extensions will be granted.
Where do I file the CbC Report?	CbC Reports must be filed with the Authority via the AEOI web portal. Please visit the website: https://aeoiportal.bra.gov.bb:8443
Can an agent file a CbC Report on behalf of an MNE Group?	Similar to FATCA and CRS an agent can file a CbC Report on behalf of a client.
What is a CbC notification?	A CbC notification informs the Authority whether the Constituent Entity is the Ultimate Parent Entity or the Surrogate Parent Entity of the MNE Group and where a Constituent Entity of an MNE Group is not the Ultimate Parent Entity nor the Surrogate Parent Entity, the Constituent Entity must notify the Authority of the identity and tax residence of the reporting entity.
How often must I file a CbC notification?	A CbC notification must be filed on an annual basis.
What is the deadline to file the CbC notification?	CbC notifications must be filed no later than the last day of the reporting fiscal year of the MNE Group. Guidance Note PPG No. 7 of 2022 provides that an MNE Group whose fiscal year ended prior to the publication of this guidance note or whose fiscal year will end in September 2022 is required to submit the completed notification form on or before October 15, 2022. E.g. 1. Company X has a fiscal year of January 1, 2021, to December 31, 2021. Company X is required to file a CbC notification on or before October 15, 2022. E.g. 2. Company Y has a fiscal year of September 1, 2021, to August 31, 2022. Company Y is required to file a CbC notification on or before October 15, 2022.

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	E.g. 3. Company Z has a fiscal year of November 1, 2021, to October 31, 2022. Company Y is required to file a CbC notification on or before October 31, 2022.
Will the Authority be granting any filing extensions for the filing of CbC notifications?	No filing extensions will be granted.
What happens if the MNE Group has 30 resident Constituent Entities in Barbados, how many CbC notifications are required?	The MNE Group is required to file 30 separate CbC notifications. One CbC notification per Constituent Entity.
Is a non-resident Constituent Entity required to file a CbC notification?	No, a CbC notification is not required for a non-resident Constituent Entity.
How do I file a CbC notification?	All CbC notifications must be filed electronically. To access the notification form visit our website at https://globalrelations.bra.gov.bb
Can an agent create an account and file CbC notifications on behalf of an MNE Group?	Yes, an agent can register and file CbC notifications on behalf of an MNE Group.
Can I see the CbC notification form before registering on the Global Relations Web Portal?	No, you are required to register via the Global Relations Web Portal and thereafter you can view the CbC notification form.
Where the MNE Group is an excluded MNE Group is it necessary to notify the Authority?	No. there is no obligation to notify the Authority. An excluded MNE Group is not required to file a CbC notification or a CbC Report.
What happens if I failed to file or submit the CbC Report by the prescribed time?	The Revenue Commissioner may impose pecuniary penalties of BBD \$10,000 under the Income Tax (Country-by-Country Reporting) Act, 2021-27.
Must I register on the Global Relations Web Portal before I can file a CbC notification?	Yes, you must first register on the portal before completing the CbC notification form.

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What details should I insert during the registration process?	<p>The details to be inserted depend on how the account will be used.</p> <p>A firm/business/company may decide to create one account which will be used by all officers to complete notifications or conduct any other business on the web portal. Alternatively, a firm/business/company may decide that each officer will create a separate account.</p>
Can I do bulk CbC notifications?	No, there is no option for bulk notifications.
How do I de-register from the AEOI for CbCR?	De-registrations will be facilitated via the Global Relations Web Portal.

Please note below the screenshots to the Global Relations Web Portal to assist with the registration.

STEP 1

- Insert a valid email address and a password.

New Registration

Already registered? [Log in here.](#)

- **EMAIL ADDRESS**

- **PASSWORD**

STEP 2

- This option is not mandatory.

New Registration

Already registered? [Log in here.](#)

• **MOBILE NUMBER**

CONTINUE

SKIP MOBILE NUMBER

STEP 3

- Select the registration type of the person seeking to create the account. For example, where a partnership is seeking to create an account, you may select the “Partnership” option.

New Registration

Already registered? [Log in here.](#)

• **REGISTRATION TYPE**

CONTINUE

[or go back?](#)

STEP 4

- Complete the required fields. This information relates to the person registering.

• REGISTRATION TYPE		
Partnership		
• PARTNERSHIP REGISTRATION #		
12345675412		
• PARTNERSHIP NAME		
James Bond Law Firm		
• CONTACT PERSON FIRST NAME		
James		
• CONTACT PERSON LAST NAME		
Bond		
• TAX IDENTIFICATION #		
1234567891234		
• DATE OF REGISTRATION		
January	1	2022
CONTINUE or go back?		

NOTES

- (a) Contact Person – You decide who the contact person is. The Authority will reach out to the contact person, if necessary, to follow up on a notification/application submitted.
- (b) Tax Identification # - The tax identification # relates to James Bond Law Firm and **NOT** James Bond's tax identification number or the tax identification number of his client.
- (c) Date of Registration – Where this is not applicable – simply enter the date that the account is created.