

**EXTERNAL BUSINESS REQUIREMENTS SPECIFICATION:**

**Country- by- Country and Financial Data Reporting**

<b>Core Business Area</b>	Automatic Exchange of Information and Exchange of Information on Request
<b>Operational Area</b>	BAIT: Taxpayer Strategy

**Distribution to Taxpayers**

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## 1 Document Management

### 1.1 Revision History

Revision History			
Date	Version	Description	Author/s
2017/03/06	1.	Reviewed the required outcomes and confirmation to the project scope	SARS
2017/03/29	1.1.	Aligned the process steps to the defined end-to-end process of the internal BRS	SARS
2017/04/05	1.3	Incorporated comments from business	SARS
2017/04/10	1.4	Incorporated comments from Legal	SARS
2017/04/12	1.5	Incorporated all the input from communications department	SARS
2017/04/13	1.6	Revised the conceptual design	SARS
2017/05/05	1.7	Update Appendix 2 for Master and Local file	SARS
2017/05/10	1.8	Revised the conceptual design	SARS
2017/05/16	1.9	Alignment to the internal BRS	SARS
2017/05/18	1.10	Incorporated comments from Legal and aligned the new definition to the document	SARS

### 1.2 Referenced Documents

Document	Version	Description	Author/s
<a href="#">OECD (2016) Country-by-Country reporting XML schema: User guide for tax administrations and taxpayers</a>	Version 1.0 (March 2016)	CbC XML Schema and User Guide describe the file layout in which the Reporting Entity shall use for referencing and submission of the CbC Financial Data Reporting.	OECD
<a href="#">OECD(2016) Guidance on the Implementation of Country-by-Country Reporting.</a>	December 2016	Guideline to the documentation of the required files.	OECD
<a href="#">SA Regulations for purposes of paragraph (b) of the definition of "international tax</a>	Published 23 December 2016 and effective for Reporting Fiscal	SA Regulations specifying the CbC Reporting Standard for Multinational Enterprises.	Government Gazette No. R.1598 of 23 December 2016

Document	Version	Description	Author/s
<a href="#"><u>standard” in section 1 of the Tax Administration Act, 2011, specifying the changes to the Country-by-Country Reporting Standard for Multinational Enterprises</u></a>	Year Fiscal Years of Multinational Entity Groups beginning on or after 1 January 2016.		
<a href="#"><u>Public Notice issued in terms of section 29 of the Tax Administration Act, 2011, requiring specified persons to keep the records, books of account or documents as specified</u></a>	Published on 28 October 2016 and applies to years of assessment commencing on or after 1 October 2016.	The notice prescribes records to be kept specifically for transfer pricing purposes and CbC Reports (under the SA CbC regulations).	<i>Government Gazette</i> No. 1334 of 28 October 2016
<a href="#"><u>OECD (2015), Transfer Pricing Documentation and Country-by-Country Reporting, Action 13 - 2015 Final Report</u></a>	5 October 2015	<p>This report contains revised standards for transfer pricing documentation and a template for a CbC Reporting (CbCR). It includes an implementation package for government-to-government exchange of CbCRs as well as:</p> <ul style="list-style-type: none"> <li>• Model legislation requiring the Ultimate Parent Entity of a Multinational Entity Group to file the CbCR in its jurisdiction of residence has been developed. Jurisdictions will be able to adapt this model legislation to their own legal systems, where changes to current legislation are required;</li> <li>• Implementing arrangements for the automatic exchange of the CbCR under international agreements including multilateral competent authority agreements (“CAAs”) based on existing international agreements (the Multilateral Convention on Mutual Administrative Assistance in Tax Matters, bilateral tax treaties and TIEAs).</li> </ul> <p>This report is incorporated by reference in the SA CbC Regulations.</p>	OECD
<a href="#"><u>Multilateral Competent Authority Agreement on the Exchange of Country-by-Country Reports</u></a>	27 January 2016	Implementing arrangement for the automatic exchange of the CbC Reports between South Africa and the <a href="#"><u>signatories of the CbC MCAA</u></a>	OECD model MCAA signed by South Africa on 27 January 2016
Arrangement Between the	With the	Implementing arrangement for the	With the

Document	Version	Description	Author/s
Competent Authority of the United States of America and the Competent Authority of the Republic of South Africa on the Exchange of Country-by-Country Reports	Commissioner for signature	automatic exchange of the Country-by-Country Reports between South Africa and the United States of America	Commissioner for signature
<a href="http://sarsportal/ProdQMS/Ops/OpsDocs/SOPs/GEN-GEN-17-SOP01%20-%20Manage%20exchange%20of%20information%20-%20Internal%20SOP.pdf">http://sarsportal/ProdQMS/Ops/OpsDocs/SOPs/GEN-GEN-17-SOP01%20-%20Manage%20exchange%20of%20information%20-%20Internal%20SOP.pdf</a>	8 March 2016	Internal SOP - Manage Exchange of Information - GEN-GEN-17-SOP01	SARS-Standard Operating Procedures

### 1.3 Acronyms and Definitions

Terms	Description
A3P	Automated 3 <sup>rd</sup> Party Data Processor – SARS system
Action 13 (2015) Final Report	The <i>OECD (2015), Transfer Pricing Documentation and Country-by-Country Reporting, Action 13 - 2015 Final Report</i>
AEOI	Automatic Exchange of Information –is one of the three methods of international information exchange used by South Africa (in addition to exchange of information on request (EOIR) and spontaneous exchange) under its international tax agreements or international standards. SA has committed to AEOI under the US FATCA IGA, OECD CRS and now the OECD/G20 BEPS Action Plan 13 (CbC)
BEPS	Base Erosion and Profit Shifting
Constituent Entity	Defined in the SA CbC Regulations as any separate business unit of an MNE Group that is included in the Consolidated Financial Statements of the MNE Group for financial reporting purposes, or would be so included if equity interests in such business unit of an MNE Group were traded on a public securities exchange
e-Filing	SARS electronic filing service on the SARS web site as defined and regulated in terms of the <a href="#">Public Notice</a> issued under section 255 of the Tax Administration Act, 2011
EOIR	Exchange of information on request
ESB	ICC integration functionality team
CbC	Country-by-Country
CbCR	Country-by-Country Report
CbC MCAA	CbC Multilateral Competent Authority Agreement

CRS	The OECD Common Reporting Standard on and Due Diligence for Financial Account Information (as defined in Section VIII(E)(7) of the <a href="#">SA CRS Regulations</a> )
FATCA IGA	Intergovernmental Agreement between SA and the US under the US Foreign Account Tax Compliance Act
Fiscal Year	Defined in the SA CbC Regulations as “an annual accounting period with respect to which the Ultimate Parent Entity of the MNE Group prepares its financial statements”
Entity	This term is generally used in OECD/G20 CbC guidelines and SA CbC Regulations and its definitions generally include the term “business unit”. As these terms certainly include companies but are not limited thereto, it is taken that they could include legal arrangements such as trusts and partnerships, as well as individuals operating as a “business unit”. The SA transfer pricing provisions under section 31 of the ITA apply to “any person”, which could include legal entities (e.g. companies); legal arrangement (e.g. trusts or partnerships) or individuals
Group	This includes: 1. A “Group” as defined in the SA CbC Regulations i.e. a collection of enterprises related through ownership or control such that it is either required to prepare Consolidated Financial Statements for financial reporting purposes under applicable accounting principles or would be so required if equity interests in any of the enterprises were traded on a public securities exchange; and 2. In any other case, a collection of connected persons as defined in section 1 read with section 31 of the ITA
IFF	Illicit Financial Flows
ITA	Income Tax Act, 1962 (Act No. 58 of 1962)
International Agreement	Defined in the SA CbC Regulations as the Multilateral Convention for Mutual Administrative Assistance in Tax Matters, any bilateral or multilateral Tax Convention, or any Tax Information Exchange Agreement to which South Africa is a party, and that by its terms provides legal authority for the exchange of tax information between jurisdictions, including automatic exchange of such information
MCAA	Multilateral Competent Authority Agreement
MNE	A Multinational Enterprise, which for purposes of this BRS includes any Group of enterprises where any enterprise in such group is tax resident in another jurisdiction or is a tax resident of South Africa that has a permanent establishment in another jurisdiction
MNE Entity	This includes: (a) The Reporting Entity of an MNE Group required to file the CbC Reports in terms of SA CbC Regulations; (b) a Constituent Entity of an MNE Group that is tax resident in South Africa required by law to submit a master file and local file; and (c) any other Entity of an MNE that is required by law to submit a master file and

	local file
MNE Group	Defined in the SA CbC Regulations to mean any Group that includes two or more enterprises the tax residence for which is in different jurisdictions, or includes an enterprise that is resident for tax purposes in one jurisdiction and is subject to tax with respect to the business carried out through a permanent establishment in another jurisdiction; and is not an Excluded MNE Group. An Excluded MNE Group is defined to mean, with respect to any Fiscal Year of the Group (as defined in the SA CbC Regulations), a Group having total consolidated group revenue of less than R10 billion (or, if paragraph 2 of Article 2 applies, 750 million Euro) during the Fiscal Year immediately preceding the Reporting Fiscal Year as reflected in its Consolidated Financial Statements for such preceding Fiscal Year
OECD	Organisation for Economic Cooperation and Development
.psv	.psv file format also in context of this BRS refers to the AEOI External BRS by SARS which refer to submission file formats .txt or .zip. This submission is specific from the South African financial industry to SARS
Reporting Entity	Defined in the SA CbC Regulations to mean the Constituent Entity that is required to file a CbC Report conforming to the requirements in Article 4 in its Jurisdiction of tax residence on behalf of the MNE Group. The Reporting Entity may be the Ultimate Parent Entity, the Surrogate Parent Entity, or any Entity described in paragraph 2 of Article 2
Reporting Fiscal Year	Defined in the SA CbC Regulations to mean that Fiscal Year the financial and Operational results of which are reflected in the CbC Report defined in Article 4 of the regulations
SA CbC Regulations	Regulations issued under section 257 of the TAA specifying the changes to the CbC Reporting Standard for Multinational Enterprises required for South Africa's circumstances which were published on 23 December 2016
SARS	South African Revenue Service
Surrogate Parent Entity	Defined in the SA CbC Regulations to mean one Constituent Entity of the MNE Group that has been appointed by such MNE Group, as a sole substitute for the Ultimate Parent Entity, to file the CbC Report in that Constituent Entity's jurisdiction of tax residence, on behalf of such MNE Group
TAA	Tax Administration Act, 2011 (Act No. 28 of 2011)
Ultimate Parent Entity	Defined in the SA CbC Regulations as a Constituent Entity of an MNE Group that owns directly or indirectly a sufficient interest in one or more other Constituent Entities of such MNE Group such that it is required to prepare Consolidated Financial Statements under accounting principles generally applied in its jurisdiction of tax residence, or would be so required if its equity interests were traded on a public securities exchange in its jurisdiction of tax residence
XML	Extensible Mark-up Language
.xml	.xml file format also in the context of the documents: FATCA XML User Guide, and Standard for Automatic Exchange of Financial Account Information in Tax Matters. These submissions are specific from SARS to a foreign jurisdiction under the FATCA or OECD and per agreement

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## 2 INTRODUCTION

### 2.1 Context and background

Corporates and connected persons such as groups of companies, trusts, partnerships or natural persons, especially MNEs comprising such connected persons, present a variety of complex compliance risks. One of the primary risks posed by such entities in terms of tax evasion and/or avoidance, and which is highlighted in SARS' 2013/14 – 2016/17 Strategic Plan and SARS Annual Performance Plan 2015/2016, is base erosion and profit shifting (“BEPS”) through unacceptable transfer pricing practices. Other risks relevant to South African (“SA”) MNEs include related party cross-border dealings, tax avoidance through offshore entities, hybrid entities, as well as customs misclassification and undervaluation.

In addition, external reports indicate the presence of illicit financial flows (“IFFs”) and trade mispricing. SARS's limited foray into this area through audit engagement has indicated that there is significant base erosion, which means that the opportunity exists for material assessments to be raised. SARS is responsive to this reality and also the need to protect the tax base, as well as enhance revenue and has thus made transfer pricing and BEPS a priority area for ensuring improved compliance.

Also, Parliamentary scrutiny, international organisations and the media have highlighted the fact that South Africa is losing billions through IFFs such as tax evasion in this context it is incumbent on SARS take prompt action.

Greater transparency and the automatic exchange of information between tax administrations are important steps forward in countering cross border tax evasion, aggressive tax avoidance and BEPS. Action 13 of the BEPS Action Plan, which was endorsed by G20 Leaders in September 2013, proposed the development of “rules regarding transfer pricing documentation to enhance transparency for tax administration, taking into consideration the compliance costs for business. The rules to be developed will include a requirement that MNEs provide all relevant governments with needed information on their global allocation of the income, economic activity and taxes paid among countries according to a common template.”

The Action 13 (2015) Final Report of the OECD/G20 BEPS Project was published on 5 October 2015. It formed part of the package of reports endorsed by G20 Finance Ministers in October 2015 and by G20 Leaders in November 2015. The Action 13 (2015) Final Report includes a common template for a CbC Report that will contain indicators of economic activity for each country the MNE Group does business in. The MNE Group head office will file the CbC Report with the MNE's Group home tax administration and it will be exchanged with local tax administrations under treaty. Special rules for

local filing of the CbC Report by subsidiaries exist if the MNE Group's home tax administration fails to meet its treaty obligations. CbC Reports that are received through this process must be kept confidential, as any information obtained under treaty must be, and may only be used for risk, economic and statistical analysis.

Standards for the consistent implementation of CbC Reports, including a standard data format and transmission system, have been developed by the OECD. The competent authority of South Africa signed the Multilateral Competent Authority Agreement on the Exchange of CbC Reports (CbC MCAA) on 27 January 2016.

The Action 13 (2015) Final Report also provides guidance on transfer pricing documentation that, if implemented by a jurisdiction, requires certain MNEs to keep high-level information regarding, for example, their global business operations and transfer pricing policies in a "master file". This master file may, in addition to the CbC Report by the MNE Group's Reporting Entity (exchanged under AEOI in terms of the CbC MCAA), be required under domestic law to also be provided to local tax administrations and would be available for exchange with other tax administrations under EOIR in terms of an International Agreement. It also requires that more transactional transfer pricing documentation be kept and provided to local tax administrations by MNEs if required, in a "local file" in each country, identifying relevant related party transactions, the amounts involved in those transactions, and the MNE entities' analysis of the transfer pricing determinations they have made with regard to those transactions.

As far as domestic legislation is concerned, one of the building blocks that needs to be in place for a jurisdiction to implement CbC reporting is the enactment or amendment of primary or secondary legislation. In this regard, legislative amendments to the TAA were effected during 2015 in order to implement CbC reporting. Amongst other amendments, a new definition of an "international tax standard" was inserted in section 1 of the TAA, which includes the CbC Reporting Standard for Multinational Enterprises specified by the Minister of Finance, subject to such changes as specified by the Minister in regulations issued under section 257 of the TAA.

Regulations specifying the changes to the CbC Reporting Standard for MNE Groups required for South Africa's circumstances were published on 23 December 2016. The SA CbC Regulations were closely modelled on the model legislation related to CbC reporting published in the Action 13 (2015) Final Report.

The information to be included in the CbC Report must be filed with the tax administration of the country of residence of the Reporting Entity for the MNE Group. The CbC Report that must be filed will be in accordance with a prescribed XML Schema and will then be transmitted to other tax jurisdictions that are signatories to the CbC MCAA in the same format.

The SA CbC Regulations only apply to MNE Groups, as defined in the Regulations, where the Group has total consolidated group revenue of more than R10 billion / €750 million during the Fiscal Year immediately preceding the Reporting Fiscal Year. Under the SA CbC Regulations, the CbC Report must be filed no later than 12 months after the last day of each Reporting Fiscal Year of the MNE Group beginning on or after 1 January 2016.

Current regulation stipulates that the filing of the CbC Report is compulsory for MNE Groups meeting the threshold. However the Action 13 (2015) Final Report provides that any MNE must prepare the master file and the local file and make this available if so obliged under the domestic law of the relevant jurisdiction. Under SA law, the SARS Commissioner may require the filing of the master file and the local file from any MNE Entity by way of public notices under section 25 of the TAA.

It is important to note that in the context of transfer pricing, there is a difference between the meaning of the term “MNE Group” under the CbC Regulations and the term “group of companies” as defined in section 1 read with section 31 of the ITA (the latter section regulating transfer pricing). The CbC Regulations only apply to MNE Groups, as defined in the regulations, where the Group essentially has total consolidated group revenue of more than R10 billion / €750 million during the fiscal year immediately preceding the Reporting Fiscal Year Fiscal Year. An SA MNE “group of companies”, which includes controlling or controlled companies not resident for tax purposes in SA as referred to in section 31 of the ITA, with a consolidated group revenue below these thresholds, may be generally referred to as an MNE but is not defined as such in the ITA and does not constitute an “MNE Group” as defined in the CbC Regulations. For purposes of this BRS the term MNE will be used collectively unless otherwise indicated.

SARS must administer and facilitate the filing of the CbC Report (by MNE Groups), master file or local file (by all MNE Entities, including MNE Entities that are required to do so by public notice under section 25 of the TAA) and implement the reporting entity financial data reporting system that will enable SARS to receive, validate and automatically or on request exchange the financial data with other tax jurisdictions under an International Agreement.

It is important to note that the threshold for CbC reporting is likely to be considerably higher than that for the master file and local file. A larger number of MNE Entities would have to submit a master file and local file, compared to MNE Groups, whose Reporting Entities, will generally only have to file CbC Reports to be automatically exchanged under the CbC MCAA. Although this has not yet been finally determined, a possible minimum threshold for requiring master file and local file by MNE Entities could be: “the aggregate of the person’s potentially affected transactions for the year of assessment, without offsetting any potentially affected transactions against one another, exceeds

or is reasonably expected to exceed R100 million". This would be in alignment with paragraph 2(b) of the [Public Notice](#) to keep the records, books of account or documents in terms of section 29 of the TAA. This would mean that all SA Reporting Entities of MNE Groups that must file a CbC Reports, will also have to file a master file and local file with SARS, if required under a public notice issued in terms of section 25 of the TAA. However, there would be MNE Entities that will only have to file a master file and local file and not a CbC report, as the threshold for CbC reporting would be higher.

## 2.2 Reporting

In line with paragraph 25 of the Action 13 (2015) Final Report, the primary objective of filing the CbC Report is to assess high level transfer pricing risks and other base erosion and profit sharing risks in South Africa.

The Action 13 (2015) Final report describes a three tiered standardised approach to transfer pricing documentation which consists of the following:

- A master file, generally compiled by a parent or headquarters Entity but available to all MNE Entities, containing standardised information relevant for all Entities.
- A local file, compiled by all MNE Entities, referring specifically to material transactions of the local MNE Group Entity.
- A CbC Report compiled by the Reporting Entity of an MNE Group containing certain information regarding global allocation of the MNE Group's income and taxes paid together with certain indicators of the location of economic activities within the MNE Group

The MNE Entities are required to file CbC Reports as prescribed by SARS, on the template/format provided so that the reported data is standardised for all specified MNE Entities and the reported data can be transmitted with other jurisdictions.

A common or compatible technical solution and system for reporting and automatically exchanging information is being developed by SARS for this purpose.

## 3 PROBLEM STATEMENT

The integration of national economies and markets into a global market has increased substantially in recent years, putting a strain on the international tax rules, which were designed more than a century ago. Weaknesses in the current rules create opportunities, such as transfer mispricing for BEPS, requiring bold moves by policy makers to restore confidence in the system and ensure that profits are taxed where economic activities take place and value is created.

Greater transparency and the automatic exchange of information between tax administrations are important steps forward in countering cross border tax evasion, aggressive tax avoidance and BEPS through, for example, transfer pricing arrangements. As a result, AEOI mechanisms, such as FATCA, CRS and CbC, have set new international standard, in addition to exchange of information on request. Transfer pricing audits by SARS are understandably complex and difficult, and SARS needs quality and complete CbC Report information to perform risk assessments given the fact that SARS finds it particularly challenging to obtain information on the global operations of an MNE headquartered elsewhere. South Africa has entered into international agreements that provide for mutual administrative assistance and automatic exchange of information with a substantial number of countries.

Failure to implement or defaulting on SA's international commitments, such as the CbC Reporting OECD/G20 international tax standard, will result in a public non-compliant rating of SA, which will result in other countries not being willing to exchange information with SA. Such an outcome may have an adverse impact on other international ratings.

#### 4 STRATEGIC CONSIDERATIONS

Based on research and audit experience, SARS's strategic and annual performance plans have since 2013 highlighted complex schemes that are used by MNEs to take advantage of cross-border structuring and transfer pricing manipulations to evade or impermissibly avoid tax. This is often done through domestic and international loopholes.

Tax avoidance by MNEs that creatively use loopholes has long been part of the international tax system. The challenge is that countries acting alone cannot close the gaps and address the mismatches that arise in the interaction between the tax systems of multiple countries.

The OECD /G20 BEPS project provided the ambit for the development of the CbC reporting plan. Action 13 provided tax administrations with information relating to transfer pricing and other BEPS risks with an intention to tackle BEPS amidst changes in the global economic climate that placed increasing pressure on governments to increase tax revenues.

CbC reporting requires MNE Groups to report on their operations in every country that they operate to enable revenue authorities to investigate irregular activities, monitor and eradicate unlawful practices and ensure that MNEs satisfy their tax obligations and pay taxes that are legally owed by them in the country that they operate in. The CbC Reports includes, *inter alia*, global allocation of income, profits, taxes paid, business activities engaged in, structure of the operations and the number of employees that are employed by the company in each country that they operate in.

In response to the above, South Africa has introduced a domestic legal framework that will enable SARS to receive and where relevant exchange pertinent transfer pricing information provided in the CbC Reports, master files and/or local files with other jurisdictions.

## **5 DOMESTIC LEGAL REQUIREMENTS**

### **5.1 The Tax Administration Act**

- Under section 3 of the TAA, SARS is responsible for the administration of all tax Acts under the control or direction of the Commissioner and may use its information gathering powers under the TAA for this purpose. Administration of a tax Act, such as the ITA, includes the matters listed in section 3(2) of the TAA.
- In terms of section 3(3) (a) of the TAA, if SARS, in accordance with an international tax agreement is obliged to exchange or wishes to spontaneously exchange information, SARS may disclose or obtain the information requested for transmission to the competent authority of the other country as if it were relevant material required for purposes of a tax Act and must treat the information obtained as taxpayer information.

### **5.2 CbC Regulations under TAA**

Under section 1 of the TAA, regulations for purposes of paragraph (b) of the definition of “international tax standard” in section 1 were promulgated under section 257 of the TAA, specifying the changes to the CbC Reporting Standard for Multinational Enterprises (the SA CbC Regulations).

In addition, the Competent Authority of South Africa signed the MCAA on the Exchange of CbC Reports on 27 January 2016, which is the implementing arrangement for the automatic exchange of the CbC Reports between South Africa and the other signatories of the CbC MCAA.

## **6 REQUIRED OUTCOME**

The required outcome from phase 1 of this project is that the CbC Reports, master files and/or local files will be filed with SARS in line with the relevant legislation and will be validated and exchanged automatically (in the case of CbC Reports) or on request (in case of the master files or – exceptionally - local files) with other tax jurisdictions. The information CbC Reports will be used by SARS for the purposes of assessing high level transfer pricing risks and other risks and the master files and local files will support this function but generally inform case selection and audit.

## **7 PROJECT SCOPE**

The scope for this BRS is the submission of CbC Reports, master file and/or local file to SARS by the relevant MNE Entities. The requirements of the CbC Report, master file and local file are summarised below:

### **CbC Report**

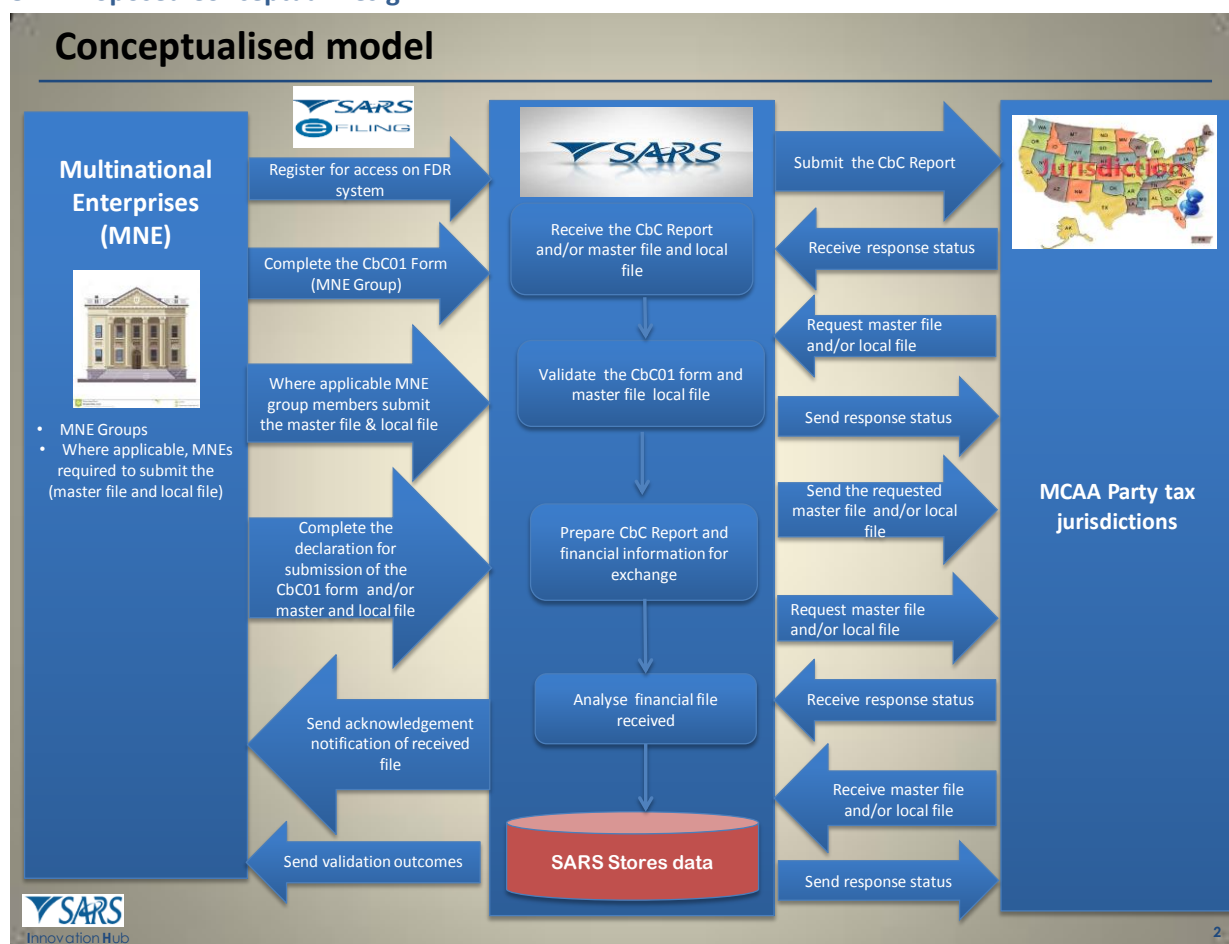
This report requires a listing of all the Constituent Entities for which financial information is reported, including the tax jurisdiction of incorporation, where it is different from the tax jurisdiction of residence, as well as the nature of the main business activities carried out by that Constituent Entity. The CbC Report will be helpful for high-level transfer pricing risk assessment purposes as per requirement set out in the Action13 (2015) Final Report.

### **Master file**

The master file should provide an overview of the MNE's business, including the nature of its global business operations, its overall transfer pricing policies, and its global allocation of income and economic activity, in order to assist tax administrations to evaluate any significant transfer pricing risk. The master file is generally compiled by a parent or headquartered Entity but is available to and may be obtained from all Entities of an MNE. In general, the master file is intended to provide a high-level overview, in order to place the MNE's transfer pricing practices in their global economic, legal, financial and tax context.

### **Local file**

This file must be compiled and kept by all MNE Entities and will provide more detailed information relating to specific intercompany transactions. The information required in the local file supplements the master file and helps to meet the objective of assuring that an Entity of the MNE has complied with the arm's length principle in its material transfer pricing positions affecting a specific jurisdiction. The local file focuses on information relevant to the transfer pricing analysis related to transactions taking place between a local country affiliate and associated enterprises in different countries and which is material in the context of the local country's tax system.



**Figure 1: Conceptual model**

The conceptual design (Figure 1) above illustrates that the MNE Entity filing and/or uploading the CbC Report and/or the master file and the local file will have to be a registered SARS eFiling user to enable it to access the Financial Data Reporting (FDR) system. Once the registered MNE Entity has logged onto e-Filing, the user will navigate through to the FDR system link and access the FDR system website.

For the CbC Report, the Reporting Entity is required to complete the CbC01 Form and before the user can complete the submission process, the user will be required to formally declare that the information captured on the CbC01 form is true and correct. The format of the form will be an Adobe form developed by SARS. The form will contain all the defined fields to compliment the CbC Report required as per the CbC XML Schema.

If the user is uploading financial data relating to the master file and the local file (policies, diagrams and transactions), these components may be uploaded individually in terms of both the requirements for the master file and the local file. This will enable SARS to ensure that the relevant user specifically submits components required for the master and/or local files. Once the user has



completed uploading the master file and/or the local file, a pop-up declaration message will necessitate the user to declare the documents loaded to be true and correct.

An immediate response from SARS acknowledging receipt of data submitted will be sent to the relevant user through the correspondence dashboard. Validations of the CbC Report submitted will be done via the FDR system against the validation rules. Based on the outcomes of the validation (successful/unsuccessful) a response message will be generated and sent to the relevant user.

Once the CbC Report have been received from the CbC Reporting Entities, SARS will consolidate the reports and prepare a single report that will be automatically transmitted with tax jurisdictions in accordance with existing treaties, under the CbC MCAA or bilateral competent authority agreements.

It must be noted that there will be no manual branch submission capability available for this project. Only submission through the FDR system will be available.

SARS will validate the compatibility of the financial data uploaded by the relevant MNE Entity. The financial information will be validated against the requirements stated in the OECD/G20 Base Erosion and Profit Shifting Project Guidance on Transfer Pricing Documentation and CbC Reporting for transmission purposes. SARS will prepare the file for exchange with other jurisdictions and receive files from other jurisdictions.

## **8.1 CbC Reporting**

The CbC Report will be presented in a CbC01 Form designed by SARS. It is required that the Reporting Entity of the MNE Group will access the form and provide crisp information about the functions performed, assets owned, personnel employed, revenue generated, profits earned, taxes paid, capital structure, retained earnings, etc., with respect to each Constituent Entity of the MNE Group located in different countries, as highlighted in the Action 13 (2015) Final Report. Thus the CbC Report is the platform to access the veracity of the blue print provided in the master file.

The CbC Report would assist in interpreting the transfer pricing policies of the MNE Group, namely how the different profit level indicators align with the transfer pricing policy stated in the master file and local file also how they vary between jurisdictions.

In order to facilitate the swift and uniform implementation of CbC Reports and with a view to accommodating the electronic preparation, filing and exchange of CbC Reports, the present CbC XML Schema and the related OECD User Guide have been developed and designed by the OECD to be

used for the automatic exchange of CbC Reports by Reporting Entities to their domestic tax authorities.

**Refer to Appendix 1 for the field description on the CbC01 Form.**

### **8.1.1 Completion of the CbC Report**

The following process will apply to the Reporting Entity of an MNE Group for submitting the CbC Report.

1. The Reporting Entity will be required to register on SARS eFiling if it is not yet a registered eFiling user.
2. On the eFiling work page, click on the FDR website tab to navigate to the FDR registration work page and register.
3. After registration, log-in to the FDR system as the user submitting on behalf of the Reporting Entity. The User login onto eFiling and the FDR on behalf of the Reporting Entity:
  - Must have Income tax reference number or PAYE reference number applicable to the Reporting Entity
  - Must have eFiling profile
  - Must select product type (CbC in this case)
  - Must be responsible for submitting declarations
  - Must be able to view dashboards on eFiling in order to track status of submitted files
4. Access the FDR link through eFiling (Financial data reporting website hosted via eFiling)
5. Click on the CbC Report tab and complete the CbC01 Form (CbC Report) that loads on the screen.
6. The user submitting on behalf of the Reporting Entity will save, cancel or submit the files:
  - a. Save: The user will be able to save the document and finalise the process later. The user can later access the saved document with the saved information pre-populated. No information will be submitted to SARS.
  - b. Cancel: If the user clicks the cancel button, the document will be cleared and the system will close. No information will be submitted to SARS
  - c. Submit: The user will complete the declaration section of the form and clicks submit to declare the information captured as true and correct.
7. SARS will send an acknowledgement of receipt for the data received
8. SARS will immediately auto-validate the data captured and received on the CbC01 form.
9. SARS will send an immediate response to the user submitting on behalf of the Reporting Entity regarding the validation outcomes of the CbC Report

10. The following outcomes may be applicable:
  - a. Accepted – file passed all validations;
  - b. Rejected – file failed some critical validations listed
  - c. Accepted with warning – file failed some validations, but records are still accepted
11. If the report does not pass the validation the user submitting on behalf of the Reporting Entity will be notified and be requested to re-submit the CbC Report
12. If the CbC Report has successfully passed the validations, then it will be saved on the SARS system for transmission to other tax jurisdictions.

## 8.2 Master file

A master file provides tax administrations with high-level information regarding the MNE's global business operations and transfer pricing policies. The master file is expected to provide an overview or blue print of an MNE's global business model, specifically covering the following aspects:

- Organisational structure
- Description of the various businesses
- Intangibles used in the businesses
- Intercompany financial transactions and
- Financial and tax positions.

The master file will provide a high level overview in order to place the MNE's transfer pricing practices in their global economic, legal, financial and tax context. It is not required to list exhaustive minutiae (e.g. a listing of every patent owned by Entities of the MNE) as this would be unnecessarily burdensome and inconsistent with the objectives of the master file.

In producing the master file, including lists of important agreements, intangibles and transactions, MNE Entities should use prudent business judgment in determining the appropriate level of detail for the information to be supplied, keeping in mind the objective of the master file. When the requirements of the master file can be fully satisfied by specific cross-references to other existing documents, such cross references, together with copies of the relevant documents, should be deemed to satisfy the relevant requirement. For purposes of producing the master file, information is considered important if its omission would affect the reliability of the transfer pricing outcomes.

There are no set formats for the master file provided in Action Plan 13 (2015): Final Report with respect to the manner of presentation or the list of details to be mandatorily incorporated since that would have restricted the flexibility of MNE Entities to prepare the master file in a manner

appropriate for their respective businesses. However, the information in Appendix 2 represents the minimal requirement to be contained in the master file. This is especially relevant as the business model of each MNE may be quite unique.

Given the flexibility provided, each MNE Entity is encouraged to prepare the master file as a real-life summary, depicting the overall TP policy and supply chain model for each of the businesses run by it, in a manner that any person reading the document may understand the intercompany pricing policies adopted by the MNE.

### 8.3 Local File

In contrast to the master file, which provides a high-level overview, the local file provides more detailed information relating to specific intercompany transactions. The information required in the local file supplements the master file and helps to meet the objective of assuring that the MNE Entity has complied with the arm's length principle in its material transfer pricing positions affecting a specific jurisdiction. Under the "**arm's-length principle**" of **transfer pricing** the amount charged by one related party to another for a given product must be the same as if the parties were not related. An **arm's-length price** for a transaction is therefore what the **price** of that transaction would be on the open market.

The local file focuses on information relevant to the transfer pricing taking place between a local country affiliate and associated enterprises in different countries and which is material in the context of the local country's tax system. Such information would include relevant financial information regarding specific transactions, a comparability analysis, and the selection and application of the most appropriate transfer pricing method. Where a requirement of the local file can be fully satisfied by a specific cross-reference to information contained in the master file, such a cross-reference should suffice.

#### 8.3.1 Submission of the master file and the local file

The following steps are applicable to the MNE Entities submitting the financial information relating to the master file and the local file:

1. Register as an eFiling user if not yet a SARS eFiling user.
2. On the eFiling work page, click on the FDR website tab to navigate to the FDR registration work page and register.
3. After registration, log-in to the FDR system as the user submitting on behalf of the MNE Entity. The User login onto eFiling and the FDR on behalf of the MNE Entity:

- Must have Income tax reference number or PAYE reference number applicable to the MNE Entity
  - Must have eFiling profile
  - Must select product type (CbC in this case)
  - Must be responsible for submitting declarations
  - Must be able to view dashboards on eFiling in order to track status of submitted files
4. Access the FDR link through eFiling (Financial data reporting website hosted via eFiling)
  5. Click on the master file tab or local file tab to access the applicable screen
  6. Attach the required documents as prescribed for either the master file or the local file
  7. The user submitting on behalf of the MNE Entity will save, cancel or submit the files:
    - a. **Save:** The user will be able to save the document and finalise the process later. The user can access the saved document with the saved information pre-populated. No information will be submitted to SARS.
    - b. **Cancel:** If the user clicks the cancel button, the document will be cleared and the system will close. No information will be submitted to SARS.
    - c. **Submit:** if the user clicks the submit button, a declaration pop-up message will appear, prompting the user to make a declaration regarding the information to be submitted.
  8. Complete the declaration requirements message.
  9. SARS will send an acknowledgement of receipt message for the data received.
  10. SARS will continue to manually validate the information loaded on the system.
  11. SARS will send immediate response to the user submitting on behalf of the MNE Entity regarding validation outcomes.
  12. The following outcomes may be applicable:
    - d. Accepted – file passed all validations;
    - e. Rejected – file failed some critical validations;
    - f. Accepted with warning – file failed some validations, but records are still accepted.
  13. If the report does not pass the validation, the user submitting on behalf of the MNE Entity will be notified and be requested to re-submit the documents or submit more information.
  14. If the uploaded documents have successfully passed the validations, then they will be saved on the SARS system for exchange with other tax jurisdictions.

## 9 GENERAL RULES

The requirement field for each data element and its attribute indicates whether the element is validation or optional in the CbC XML Schema.

1. **“Validation”** elements MUST be present for ALL data records in a file so that an automated validation check can be undertaken. The sender should do a technical check of the data file content using XML tools to make sure all validation elements are present. If they are not, a correction to the file should be made. SARS may check the presence of all validation elements and may reject the file in case such elements are missing
2. Some elements are shown as “(Optional) Mandatory”, indicating they are in principle required for CbC reporting, but only in certain instances
3. Consequently, “(Optional) Mandatory” elements may be present in most (but not all) circumstances, which means there cannot be a simple IT validation process to check these. For example, the MNE Entity and CbC Reports elements are labelled as “Optional (Mandatory)”, indicating that both elements are in principle mandatory, unless one of the elements is left blank in the context of a correction of the other element (see the Corrections section below for further detail)
4. Other “Optional” elements are, while recommended, not required to be provided and may in certain instances represent a choice between one type or another, where one of them must be used (e.g. choice between address fix or address free)
5. Data fields must not start with a space
6. All files must conform to the LATIN-1 character encoding
7. Different types of validations as well as the sequence of validations to be performed on files are as follows:
  - 1.SARS will reject an entire file under any of the following conditions:
    - The file is corrupt, i.e. the file could not be read
    - The file fails structure validations, i.e. error(s) were found in the number of pipe separators in the submission file header, summary or line item level taxpayer data header, body or trailer, or specific field errors were found in the submission file header, summary or line item level taxpayer data header or trailer. Field validations on the file body are addressed in point 2 below
    - Invalid file name.
  - 2.SARS will accept an entire file under the following conditions:
    - Zero fields were rejected
    - One or more records were found to be duplicates.
  - 3.SARS will partially upload a file under the following conditions:
    - One or more record(s) were rejected.

8. The fields in the file body are subjected to all of the following types of validations and in the sequence as described below:
1. Required: validates whether the field is required to be completed. Can be mandatory, conditional or optional. If the field is conditional, a condition rule is supplied.
  2. Data type: specifies numeric or alpha numeric.
  3. Length type: indicates whether the length of the field can be VAR or fixed.
  4. Length min: max specifies the minimum length and the maximum length a field can have. If the field has a fixed length type, the minimum and maximum lengths are the same. Based on whether the condition rule is met, different minimum and maximum lengths are defined.
  5. Data validations: validates whether the field complies to format rules or belongs to a pre-defined set of values.
  6. Logic validations: applies a logic validation on the value of the field.
9. The system will allow the specified user (technical user) to upload multiple types of information (MNE Structures, policies and financials) via e-Filing and the size of the files to be uploaded will be limited to 100 megabytes per individual file/data loaded(e.g. if the technical user is uploading a structure of the MNE, then the document size will be limited to a 100 megabytes)

**Note:** When records are being validated by SARS, the validations will be done in the sequence as described above. Once a field has failed any one of these validations no further validations will be done on that field. For example, if a field passes the required and data type validations (numbers 1 and 2 above) and then fails on length type (number 3), the length, data and logic validations will not be performed and the error on the length type will be recorded in the response file.

## 10 Appendices

### Appendix 1: Field description for the CbC01 Form

#### 10.1.1 File Layout: OrganisationParty\_Type (Reporting Entity)

This section of the form will be used to identify each Constituent Entity, including the Reporting Entity on which information is to be provided as part of the CbC Report.

Element	File Name Structure Requirements
<b>Res Country Code</b>	This data element should contain the country code(s) of the tax jurisdiction of the Constituent Entity (or, in case of a permanent establishment that is a Constituent Entity, the jurisdiction in which such permanent establishment is subject to tax).
<b>TIN</b>	This data element provides the tax identification number (TIN) used by the tax administration of the tax jurisdiction of the Constituent Entity. In case the relevant Constituent Entity has a TIN that is used by the tax administration in its Tax Jurisdiction, such TIN is to be mandatorily provided, as to ensure the quality of the data, as well as the correct use thereof. In case a Constituent Entity does not have a TIN, the value "NO TIN" should be entered.
<b>TIN</b>	This attribute describes the jurisdiction that issued the TIN.
<b>IN</b>	This data element can be provided (and repeated) if there are other Ins available, such as a company registration number or a Global Entity Identification Number (EIN).
<b>IN</b>	If the jurisdiction is not known then this element may be left blank.
<b>IN</b>	This attribute defines the type of IN being sent (e.g. EIN).
<b>Name</b>	This element should contain the full legal name of the Constituent Entity, including the domestic designation for the legal form, as indicated in its articles of incorporation or any similar document. In case the Constituent Entity is a permanent establishment, the name of the Constituent Entity should be followed by "(P.E.)".
<b>Country Code</b>	This data element provides the country code associated with the Constituent Entity



<b>Address Free</b>	In this case, the city, sub Entity, and postal code information should be entered in the appropriate fixed elements.	
<b>Street</b>	The above data elements comprise the Address Fix type.	
<b>Building Identifier</b>		
<b>Suite Identifier</b>		
<b>District Name</b>		
<b>POB</b>		
<b>Postcode</b>		The above data elements comprise the Address Fix type.
<b>City</b>		
<b>Country Sub Entity</b>		

The following must be noted with regards to the Address type:

1. There are two alternative options for Address type in the CbC XML schema – Address Fix and Address Free. In principle, Address Fix should be completed in all cases, unless the Reporting Entity is not in a position to define the various parts of a Constituent Entity’s address, in which case the Address Free type may be used.
2. While the CbC reporting template does not require that the address of each Constituent Entity be reported, it is strongly recommended that this information is provided, as to ensure that the data in the CbC XML Schema is of a high quality, is accurately matched and appropriately used by the receiving jurisdiction(s).

This data element is the permanent residence address of a Constituent Entity.

### 10.1.2 File Layout: CbC Body

The CbC Body contains the information on the Constituent Entities, including the Reporting Entity, of the MNE Group for which a CbC Report is filed, as well as the key indicators of the MNE Group as a whole and the individual Constituent Entities, as foreseen in the CbC reporting template.

Element	File Name Structure Requirements
Reporting Entity	The Reporting Entity element contains the identifying information for the entity of the MNE Group that prepares and files the CbC Report.
CbC Reports	The CbC Reports element contains, for each tax jurisdiction in which the MNE Group operates, a summary of key indicators, as well as a list of all Constituent Entities and their business activities.
Additional Info	The Additional Info element allows entering any additional information on the CbC Report that the Reporting Entity wishes to make available to the receiving Competent Authorities in a free text format.
Reporting Entity	This data element identifies the Reporting Entity and its role in the context of CbC reporting. It may be left blank in case a correction or deletion is carried out or new data is provided in the CbC Reports element (see further guidance in the Corrections section below).
Entity	This element contains the identifying information for the Reporting Entity. The Entity element uses the OrganisationParty_Type to provide the identifying information
Reporting Role	The Reporting Role element specifies the role of the Reporting Entity with respect to the filing of the CbC Report. Possible values are: <ul style="list-style-type: none"> <li>• CBC 701 – Ultimate Parent Entity</li> <li>• CBC 702 – Surrogate Parent Entity</li> <li>• [CBC 703 – Local Filing] – <i>the Local Filing value is only to be used in case the tax jurisdiction of the Reporting Entity has mandated the use of the CbC XML Schema for local filing of CbC Reports and if such local filing is required on the basis of the domestic legislation of the jurisdiction of the Reporting Entity.</i></li> </ul>
Revenues	Additional detail on the information to be provided in the Revenues element and its sub elements are available further below.
Profit Or Loss	In the Profit or Loss element, the sum of the profit or loss before income tax for all Constituent Entities resident for tax purposes in the relevant tax jurisdiction should be entered. The profit or loss before income tax should include all extraordinary income and expense items.
Profit Or Loss	All amounts must be accompanied by the appropriate 3 character currency code based on the ISO 4217 Alpha 3 Standard. <b>Refer to Appendix 5</b>

<b>Tax Paid</b>	In the tax paid element, the total amount of income tax actually paid during the relevant Fiscal Year by all Constituent Entities resident for tax purposes in the relevant tax jurisdiction should be provided. Taxes paid should include cash taxes paid by a Constituent Entity to the residence tax jurisdiction and to all other tax jurisdictions. Taxes paid should include withholding taxes paid by other Entities (associated enterprises and independent enterprises) with respect to payments to the Constituent Entity. Thus, if company A resident in tax jurisdiction A earns interest in tax jurisdiction B, the tax withheld in tax jurisdiction B should be reported by company A.
<b>Tax Paid</b>	All amounts must be accompanied by the appropriate 3 character currency code based on the ISO 4217 Alpha 3 Standard.
<b>Tax Accrued</b>	In the Tax Accrued element, the sum of the accrued current tax expense recorded on taxable profits or losses of the year of reporting of all Constituent Entities resident for tax purposes in the relevant tax jurisdiction should be provided. The current tax expense should reflect only operations in the current year and should not include deferred taxes or provisions for uncertain tax liabilities.
<b>Tax Accrued</b>	All amounts must be accompanied by the appropriate 3 character currency code based on the ISO 4217 Alpha 3 Standard.
<b>Capital</b>	In the Capital element, the sum of the stated capital of all Constituent Entities resident for tax purposes in the relevant tax jurisdiction should be provided. With regard to permanent establishments, the stated capital should be reported by the legal Entity of which it is a permanent establishment, unless there is a defined capital requirement in the permanent establishment tax jurisdiction for regulatory purposes. In such case, the capital attributed to a permanent establishment may be further specified in the Additional Info element.
<b>Capital</b>	All amounts must be accompanied by the appropriate 3 character currency code based on the ISO 4217 Alpha 3 Standard.
<b>Earnings</b>	In the Earnings element, the sum of the total accumulated earnings of all Constituent Entities resident for tax purposes in the relevant tax jurisdiction as of the end of the year should be provided. With regard to permanent establishments, accumulated earnings should be reported by the legal Entity of which it is a permanent establishment.
<b>Earnings</b>	All amounts must be accompanied by the appropriate 3 character currency code based on the ISO 4217 Alpha 3 Standard.
<b>Nb Employees</b>	In the Nb Employees element, the total number of employees on a fulltime equivalent (FTE) basis of all Constituent Entities resident for tax purposes in the relevant tax jurisdiction should be provided. The number of employees may be reported as of the year-end, on the basis of average employment levels for the year or on any other basis consistently applied across tax jurisdictions and from year to year. For this purpose, Independent contractors participating in the ordinary operating activities of the Constituent Entity may be reported as employees. Reasonable rounding or approximation of the number of employees is permissible, providing that such rounding or approximation does not materially distort the relative distribution of employees across the various tax jurisdictions. Consistent approaches should be applied from year to year and across Entities.
<b>Assets</b>	In the Assets elements, the sum of the net book values of tangible assets of all Constituent Entities resident for tax purposes in the relevant tax jurisdiction should be provided. With regard to permanent establishments, assets should be reported by reference to the tax jurisdiction in which the permanent establishment is situated. Tangible assets for this purpose do not include cash or cash

	equivalents, intangibles, or financial assets.
<b>Assets</b>	All amounts must be accompanied by the appropriate 3 character currency code based on the ISO 4217 Alpha 3 Standard.
<b>Element</b>	<b>File Name Structure Requirements</b>
<b>Revenues</b>	In the Revenues element, the following information should be entered:
<b>Unrelated</b>	In the Unrelated element the sum of revenues of all the Constituent Entities of the MNE Group in the relevant tax jurisdiction generated from transactions with independent parties should be indicated. Revenues should include revenues from sales of inventory and properties, services, royalties, interest, premiums and any other amounts. Revenues should exclude payments received from other Constituent Entities that are treated as dividends in the payer's tax jurisdiction.
<b>Unrelated</b>	All amounts must be accompanied by the appropriate 3 character Currency code based on the ISO 4217 Alpha 3 Standard.
<b>Related</b>	In the Related element the sum of revenues of all the Constituent Entities of the MNE Group in the relevant tax jurisdiction generated from transactions with associated enterprises is indicated. Revenues should include revenues from sales of inventory and properties, services, royalties, interest, premiums and any other amounts. Revenues should exclude payments received from other Constituent Entities that are treated as dividends in the payer's Tax Jurisdiction
<b>Related</b>	All amounts must be accompanied by the appropriate 3 character currency code based on the ISO 4217 Alpha 3 Standard.
<b>Total</b>	In the Total element the sum of the Unrelated and Related elements should be entered.
<b>Total</b>	All amounts must be accompanied by the appropriate 3 character currency code based on the ISO 4217 Alpha 3 Standard.
<b>ConstEntities</b>	The ConstEntities element is to be repeated for each Constituent Entity (including the Reporting Entity, if applicable) that is resident for tax purposes or subject to tax as a permanent establishment in the relevant tax jurisdiction and is composed of:
<b>ConstEntity</b>	In the ConstEntity element the identifying information for a Constituent Entity should be entered, using the OrganisationParty_Type.
<b>IncorpCountryCode</b>	In the IncorpCountryCode element, the tax jurisdiction under whose laws a Constituent Entity of the MNE Group is organised or incorporated should be indicated, if such tax jurisdiction is different from the tax jurisdiction of residence of the Constituent Entity.
<b>BizActivities</b>	In the BizActivities element, the nature of the main business activity (ies) carried out by a Constituent Entity in the relevant Tax Jurisdiction should be specified. <b>Refer to Appendix6</b>

<b>Other Entity Info</b>	In the Other Entity Info element any further relevant information relating to a specific Constituent Entity may be entered in a free text format. In case additional information does not solely relate to a specific Constituent Entity, but also has relevance for the MNE Group as a whole, such information should instead be provided in the Additional Info element.
<b>Additional Info</b>	The Additional Info element allows any further brief information or explanation to be entered that is deemed necessary or that would facilitate the understanding of the compulsory information provided in the other elements of the CbC XML Schema in a free text format, provided such information does not solely relate to a specific Constituent Entity, in which case the information should be entered in the Other Entity Info element of the concerned Constituent Entity. However, information entered in the Additional Info element may be “tagged” as set out below, with a view to facilitating the association of the information provided to particular jurisdictions and/or specific elements of the Summary element of the CbC Report.

## Appendix 2 - Requirements of the master file

### Organisational structure

- Chart illustrating the MNE's legal and ownership structure and geographical location of operating Entities.

### Description of MNE's Business (es)

- Important drivers of business profit
- A description of the supply chain for the MNE's five largest products and/ or service offerings by turnover plus any other products and/or services amounting to more than 5 percent of group turnover. The required description could take the form of a chart or a diagram
- A list and brief description of important service arrangements between Entities of the MNE , other than research and development (R&D) services, including a description of the capabilities of the principal locations providing important services and transfer pricing policies for allocating service costs and determining prices to be paid for intra-group services
- A description of the main geographic markets for the group's products and services that are referred to in the second bullet point above
- A brief written functional analysis describing the principal contributions to value creation by individual Entities within the group, i.e. key functions performed, important risks assumed, and important assets used; and
- A description of important business restructuring transactions, acquisitions and divestitures occurring during the Fiscal Year.

### MNE intangibles (as defined in Chapter VI of these Guidelines)

- A general description of the MNE's overall strategy for the development, ownership and exploitation of intangibles, including location of principal R&D facilities and location of R&D management.
- A list of intangibles or groups of intangibles of the MNE that are important for transfer pricing purposes and which Entities legally own them.
- A list of important agreements among identified associated enterprises related to intangibles, including cost contribution arrangements, principal research service agreements and licence agreements.
- A general description of the group's transfer pricing policies related to R&D and intangibles; and

- A general description of any important transfers of interests in intangibles among associated enterprises during the Fiscal Year concerned, including the Entities, countries, and compensation involved.

#### **MNE intercompany financial activities**

- A general description of how the group is financed, including important financing arrangements with unrelated lenders
- The identification of any Entity of the MNE that provide a central financing function for the MNE, including the country under whose laws the Entity is organised and the place of effective management of such Entities and
- A general description of the MNE's general transfer pricing policies related to financing arrangements between associated enterprises.

#### **MNE financial and tax positions**

- The MNE's annual consolidated financial statement for the Fiscal Year concerned if otherwise prepared for financial reporting, regulatory, internal management, tax or other purposes and
- A list and brief description of the MNE's existing unilateral advance pricing agreements (APAs) and other tax rulings relating to the allocation of income among countries.

## Appendix 3 -Requirements for the Local File

Annex II to Chapter V of these Guidelines sets out the information to be included in the local file.

### Local Entity

- A description of the management structure of the local Entity, a local organisation chart, and a description of the individuals to whom local management reports and the country(ies) in which such individuals maintain their principal offices.
- A detailed description of the business and business strategy pursued by the local Entity, including an indication whether the local Entity has been involved in or affected by business restructurings or intangibles transfers in the present or immediate past year and an explanation of those aspects of such transactions affecting the local Entity; and
- Key competitors.

### Controlled transactions

For each material category of controlled transactions in which the Entity is involved, provide the following information:

- A description of the material controlled transactions (e.g. procurement of manufacturing services, purchase of goods, provision of services, loans, financial and performance guarantees, licences of intangibles, etc.) and the context in which such transactions take place.
- The amount of intra-group payments and receipts for each category of controlled transactions involving the local Entity (i.e. payments and receipts for products, services, royalties, interest, etc.) broken selected transfer pricing method.
- An identification of associated enterprises involved in each category of controlled transactions, and the relationship amongst them.
- Copies of all material intercompany agreements concluded by the local entity.
- A detailed comparability and functional analysis of the taxpayer and relevant associated enterprises with respect to each documented category of controlled transactions, including any changes compared to prior years<sup>1</sup>.
- An indication of the most appropriate transfer pricing method with regard to the category of transaction and the reasons for selecting that method.
- An indication of which associated enterprise is selected as the tested party, if applicable, and an explanation of the reasons for this selection.

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<sup>1</sup> To the extent this functional analysis duplicates information in the master file, a cross-reference to the master file is sufficient.



- A summary of the important assumptions made in applying the transfer pricing methodology.
- If relevant, an explanation of the reasons for performing a multi-year analysis.
- A list and description of selected comparable uncontrolled transactions (internal or external), if any, and information on relevant financial indicators for independent enterprises relied on in the transfer pricing analysis, including a description of the comparable search methodology and the source of such information.
- A description of any comparability adjustments performed, and an indication of whether adjustments have been made to the results of the tested party, the comparable uncontrolled transactions, or both.
- A description of the reasons for concluding that relevant transactions were priced on an arm's length basis based on the application of the selected transfer pricing method.
- A summary of financial information used in applying the transfer pricing methodology; and
- A copy of existing unilateral and bilateral/multilateral APAs and other tax rulings to which the local tax jurisdiction is not a party and which are related to controlled transactions described above.

#### Financial information

- Annual local Entity financial accounts for the Fiscal Year concerned. If audited statements exist they should be supplied and if not, existing unaudited statements should be supplied.
- Information and allocation schedules showing how the financial data used in applying the transfer pricing method may be tied to the annual financial statements; and
- Summary schedules of relevant financial data, for comparable use in the analysis and the sources from which that data was obtained.

#### Appendix 4: Country Codes are aligned with the ISO3166 standard.

Cod e	Description	Cod e	Description	Cod e	Description
AF	AFGHANISTAN	GH	GHANA	OM	OMAN
AX	ÅLAND ISLANDS	GI	GIBRALTAR	PK	PAKISTAN
AL	ALBANIA	GR	GREECE	PW	PALAU
DZ	ALGERIA	GL	GREENLAND	PS	PALESTINE, STATE OF
AS	AMERICAN SAMOA	GD	GRENADA	PA	PANAMA

<b>Cod e</b>	<b>Description</b>	<b>Cod e</b>	<b>Description</b>	<b>Cod e</b>	<b>Description</b>
<b>AD</b>	ANDORRA	GP	GUADELOUPE	PG	PAPUA NEW GUINEA
<b>AO</b>	ANGOLA	GU	GUAM	PY	PARAGUAY
<b>AI</b>	ANGUILLA	GT	GUATEMALA	PE	PERU
<b>AQ</b>	ANTARCTICA	GG	GUERNSEY	PH	PHILIPPINES
<b>AG</b>	ANTIGUA AND BARBUDA	GN	GUINEA	PN	PITCAIRN
<b>AR</b>	ARGENTINA	GW	GUINEA-BISSAU	PL	POLAND
<b>AM</b>	ARMENIA	GY	GUYANA	PT	PORTUGAL
<b>AW</b>	ARUBA	HT	HAITI	PR	PUERTO RICO
<b>AU</b>	AUSTRALIA	HM	HEARD ISLAND AND MCDONALD ISLANDS	QA	QATAR
<b>AT</b>	AUSTRIA	VA	HOLY SEE (VATICAN CITY STATE)	RE	RÉUNION
<b>AZ</b>	AZERBAIJAN	HN	HONDURAS	RO	ROMANIA
<b>BS</b>	BAHAMAS	HK	HONG KONG	RU	RUSSIAN FEDERATION
<b>BH</b>	BAHRAIN	HU	HUNGARY	RW	RWANDA
<b>BD</b>	BANGLADESH	IS	ICELAND	BL	SAINT BARTHÉLEMY
<b>BB</b>	BARBADOS	IN	INDIA	SH	SAINT HELENA, ASCENSION AND TRISTAN DA CUNHA
<b>BY</b>	BELARUS	ID	INDONESIA	KN	SAINT KITTS AND NEVIS
<b>BE</b>	BELGIUM	IR	IRAN, ISLAMIC REPUBLIC OF	LC	SAINT LUCIA
<b>BZ</b>	BELIZE	IQ	IRAQ	MF	SAINT MARTIN (FRENCH PART)
<b>BJ</b>	BENIN	IE	IRELAND	PM	SAINT PIERRE AND MIQUELON
<b>BM</b>	BERMUDA	IM	ISLE OF MAN	VC	SAINT VINCENT AND THE

<b>Cod e</b>	<b>Description</b>	<b>Cod e</b>	<b>Description</b>	<b>Cod e</b>	<b>Description</b>
					GRENADINES
<b>BT</b>	BHUTAN	IL	ISRAEL	WS	SAMOA
<b>BO</b>	BOLIVIA, PLURINATIONAL STATE OF	IT	ITALY	SM	SAN MARINO
<b>BQ</b>	BONAIRE, SINT EUSTATIUS AND SABA	JM	JAMAICA	ST	SAO TOME AND PRINCIPE
<b>BA</b>	BOSNIA AND HERZEGOVINA	JP	JAPAN	SA	SAUDI ARABIA
<b>BW</b>	BOTSWANA	JE	JERSEY	SN	SENEGAL
<b>BV</b>	BOUVET ISLAND	JO	JORDAN	RS	SERBIA
<b>BR</b>	BRAZIL	KZ	KAZAKHSTAN	SC	SEYCHELLES
<b>IO</b>	BRITISH INDIAN OCEAN TERRITORY	KE	KENYA	SL	SIERRA LEONE
<b>BN</b>	BRUNEI DARUSSALAM	KI	KIRIBATI	SG	SINGAPORE
<b>BG</b>	BULGARIA	KP	KOREA, DEMOCRATIC PEOPLE'S REPUBLIC OF	SX	SINT MAARTEN (DUTCH PART)
<b>BF</b>	BURKINA FASO	KR	KOREA, REPUBLIC OF	SK	SLOVAKIA
<b>BI</b>	BURUNDI	KW	KUWAIT	SI	SLOVENIA
<b>KH</b>	CAMBODIA	KG	KYRGYZSTAN	SB	SOLOMON ISLANDS
<b>CM</b>	CAMEROON	LA	LAO PEOPLE'S DEMOCRATIC REPUBLIC	SO	SOMALIA
<b>CA</b>	CANADA	LV	LATVIA	ZA	SOUTH AFRICA
<b>CV</b>	CAPE VERDE	LB	LEBANON	GS	SOUTH GEORGIA AND THE SOUTH SANDWICH ISLANDS
<b>KY</b>	CAYMAN ISLANDS	LS	LESOTHO	SS	SOUTH SUDAN
<b>CF</b>	CENTRAL AFRICAN	LR	LIBERIA	ES	SPAIN

<b>Cod e</b>	<b>Description</b>	<b>Cod e</b>	<b>Description</b>	<b>Cod e</b>	<b>Description</b>
	REPUBLIC				
<b>TD</b>	CHAD	LY	LIBYA	LK	SRI LANKA
<b>CL</b>	CHILE	LI	LIECHTENSTEIN	SD	SUDAN
<b>CN</b>	CHINA	LT	LITHUANIA	SR	SURINAME
<b>CX</b>	CHRISTMAS ISLAND	LU	LUXEMBOURG	SJ	SVALBARD AND JAN MAYEN
<b>CC</b>	COCOS (KEELING) ISLANDS	MO	MACAO	SZ	SWAZILAND
<b>CO</b>	COLOMBIA	MK	MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF	SE	SWEDEN
<b>KM</b>	COMOROS	MG	MADAGASCAR	CH	SWITZERLAND
<b>CG</b>	CONGO	MW	MALAWI	SY	SYRIAN ARAB REPUBLIC
<b>CD</b>	CONGO, THE DEMOCRATIC REPUBLIC OF THE	MY	MALAYSIA	TW	TAIWAN, PROVINCE OF CHINA
<b>CK</b>	COOK ISLANDS	MV	MALDIVES	TJ	TAJIKISTAN
<b>CR</b>	COSTA RICA	ML	MALI	TZ	TANZANIA, UNITED REPUBLIC OF
<b>CI</b>	CÔTE D'IVOIRE	MT	MALTA	TH	THAILAND
<b>HR</b>	CROATIA	MH	MARSHALL ISLANDS	TL	TIMOR-LESTE
<b>CU</b>	CUBA	MQ	MARTINIQUE	TG	TOGO
<b>CW</b>	CURAÇAO	MR	MAURITANIA	TK	TOKELAU
<b>CY</b>	CYPRUS	MU	MAURITIUS	TO	TONGA
<b>CZ</b>	CZECH REPUBLIC	YT	MAYOTTE	TT	TRINIDAD AND TOBAGO
<b>DK</b>	DENMARK	MX	MEXICO	TN	TUNISIA
<b>DJ</b>	DJIBOUTI	FM	MICRONESIA,	TR	TURKEY

<b>Cod e</b>	<b>Description</b>	<b>Cod e</b>	<b>Description</b>	<b>Cod e</b>	<b>Description</b>
			FEDERATED STATES OF		
<b>DM</b>	DOMINICA	MD	MOLDOVA, REPUBLIC OF	TM	TURKMENISTAN
<b>DO</b>	DOMINICAN REPUBLIC	MC	MONACO	TC	TURKS AND CAICOS ISLANDS
<b>EC</b>	ECUADOR	MN	MONGOLIA	TV	TUVALU
<b>EG</b>	EGYPT	ME	MONTENEGRO	UG	UGANDA
<b>SV</b>	EL SALVADOR	MS	MONTSERRAT	UA	UKRAINE
<b>GQ</b>	EQUATORIAL GUINEA	MA	MOROCCO	AE	UNITED ARAB EMIRATES
<b>ER</b>	ERITREA	MZ	MOZAMBIQUE	GB	UNITED KINGDOM
<b>EE</b>	ESTONIA	M M	MYANMAR	US	UNITED STATES
<b>ET</b>	ETHIOPIA	NA	NAMIBIA	UM	UNITED STATES MINOR OUTLYING ISLANDS
<b>FK</b>	FALKLAND ISLANDS (MALVINAS)	NR	NAURU	UY	URUGUAY
<b>FO</b>	FAROE ISLANDS	NP	NEPAL	UZ	UZBEKISTAN
<b>FJ</b>	FIJI	NL	NETHERLANDS	VU	VANUATU
<b>FI</b>	FINLAND	NC	NEW CALEDONIA	VE	VENEZUELA, BOLIVARIAN REPUBLIC OF
<b>FR</b>	FRANCE	NZ	NEW ZEALAND	VN	VIET NAM
<b>GF</b>	FRENCH GUIANA	NI	NICARAGUA	VG	VIRGIN ISLANDS, BRITISH
<b>PF</b>	FRENCH POLYNESIA	NE	NIGER	VI	VIRGIN ISLANDS, U.S.
<b>TF</b>	FRENCH SOUTHERN TERRITORIES	NG	NIGERIA	WF	WALLIS AND FUTUNA
<b>GA</b>	GABON	NU	NIUE	EH	WESTERN SAHARA
<b>GM</b>	GAMBIA	NF	NORFOLK ISLAND	YE	YEMEN

Cod e	Description	Cod e	Description	Cod e	Description
GE	GEORGIA	MP	NORTHERN MARIANA ISLANDS	ZM	ZAMBIA
DE	GERMANY	NO	NORWAY	ZW	ZIMBABWE

#### Appendix 5: Currency Code Based On the ISO 4217 Alpha 3 Standard

All amounts provided in the CbC Report should be reported in one and the same currency, being the currency of the Reporting MNE. If statutory financial statements are used as the basis for reporting, all amounts should be translated to the stated functional currency of the Reporting MNE at the average exchange rate for the year stated in the Additional Info element.

Jurisdiction	Currency	Alphabetic code
AFGHANISTAN	Afghani	AFN
ÅLAND ISLANDS	Euro	EUR
ALBANIA	Lek	ALL
ALGERIA	Algerian Dinar	DZD
AMERICAN SAMOA	US Dollar	USD
ANDORRA	Euro	EUR
ANGOLA	Kwanza	AOA
ANGUILLA	East Caribbean Dollar	XCD
ANTARCTICA	No universal currency	
ANTIGUA AND BARBUDA	East Caribbean Dollar	XCD
ARGENTINA	Argentine Peso	ARS
ARMENIA	Armenian Dram	AMD
ARUBA	Aruban Florin	AWG
AUSTRALIA	Australian Dollar	AUD
AUSTRIA	Euro	EUR
AZERBAIJAN	Azerbaijani Manat	AZN
BAHAMAS (THE)	Bahamian Dollar	BSD
BAHRAIN	Bahraini Dinar	BHD
BANGLADESH	Taka	BDT
BARBADOS	Barbados Dollar	BBD
BELARUS	Belarussian Ruble	BYR

BELGIUM	Euro	EUR
BELIZE	Belize Dollar	BZD
BENIN	CFA Franc BCEAO	XOF
BERMUDA	Bermudian Dollar	BMD
BHUTAN	Ngultrum	BTN
BHUTAN	Indian Rupee	INR
BOLIVIA (PLURINATIONAL STATE OF)	Boliviano	BOB
BOLIVIA (PLURINATIONAL STATE OF)	Mvdol	BOV
BONAIRE, SINT EUSTATIUS AND SABA	US Dollar	USD
BOSNIA AND HERZEGOVINA	Convertible Mark	BAM
BOTSWANA	Pula	BWP
BOUVET ISLAND	Norwegian Krone	NOK
BRAZIL	Brazilian Real	BRL
BRITISH INDIAN OCEAN TERRITORY (THE)	US Dollar	USD
BRUNEI DARUSSALAM	Brunei Dollar	BND
BULGARIA	Bulgarian Lev	BGN
BURKINA FASO	CFA Franc BCEAO	XOF
BURUNDI	Burundi Franc	BIF
CABO VERDE	Cabo Verde Escudo	CVE
CAMBODIA	Riel	KHR
CAMEROON	CFA Franc BEAC	XAF
CANADA	Canadian Dollar	CAD
CAYMAN ISLANDS (THE)	Cayman Islands Dollar	KYD
CENTRAL AFRICAN REPUBLIC (THE)	CFA Franc BEAC	XAF
CHAD	CFA Franc BEAC	XAF
CHILE	Unidad de Fomento	CLF
CHILE	Chilean Peso	CLP
CHINA	Yuan Renminbi	CNY
CHRISTMAS ISLAND	Australian Dollar	AUD
COCOS (KEELING) ISLANDS (THE)	Australian Dollar	AUD
COLOMBIA	Colombian Peso	COP
COLOMBIA	Unidad de Valor Real	COU
COMOROS (THE)	Comoro Franc	KMF
CONGO (THE DEMOCRATIC REPUBLIC OF THE)	Congolese Franc	CDF
CONGO (THE)	CFA Franc BEAC	XAF
COOK ISLANDS (THE)	New Zealand Dollar	NZD
COSTA RICA	Costa Rican Colon	CRC
CÔTE D'IVOIRE	CFA Franc BCEAO	XOF
CROATIA	Kuna	HRK

CUBA	Peso Convertible	CUC
CUBA	Cuban Peso	CUP
CURAÇAO	Netherlands Antillean Guilder	ANG
CYPRUS	Euro	EUR
CZECH REPUBLIC (THE)	Czech Koruna	CZK
DENMARK	Danish Krone	DKK
DJIBOUTI	Djibouti Franc	DJF
DOMINICA	East Caribbean Dollar	XCD
DOMINICAN REPUBLIC (THE)	Dominican Peso	DOP
ECUADOR	US Dollar	USD
EGYPT	Egyptian Pound	EGP
EL SALVADOR	El Salvador Colon	SVC
EL SALVADOR	US Dollar	USD
EQUATORIAL GUINEA	CFA Franc BEAC	XAF
ERITREA	Nakfa	ERN
ESTONIA	Euro	EUR
ETHIOPIA	Ethiopian Birr	ETB
EUROPEAN UNION	Euro	EUR
FALKLAND ISLANDS (THE) [MALVINAS]	Falkland Islands Pound	FKP
FAROE ISLANDS (THE)	Danish Krone	DKK
FIJI	Fiji Dollar	FJD
FINLAND	Euro	EUR
FRANCE	Euro	EUR
FRENCH GUIANA	Euro	EUR
FRENCH POLYNESIA	CFP Franc	XPF
FRENCH SOUTHERN TERRITORIES (THE)	Euro	EUR
GABON	CFA Franc BEAC	XAF
GAMBIA (THE)	Dalasi	GMD
GEORGIA	Lari	GEL
GERMANY	Euro	EUR
GHANA	Ghana Cedi	GHS
GIBRALTAR	Gibraltar Pound	GIP
GREECE	Euro	EUR
GREENLAND	Danish Krone	DKK
GRENADA	East Caribbean Dollar	XCD
GUADELOUPE	Euro	EUR
GUAM	US Dollar	USD
GUATEMALA	Quetzal	GTQ
GUERNSEY	Pound Sterling	GBP
GUINEA	Guinea Franc	GNF



GUINEA-BISSAU	CFA Franc BCEAO	XOF
GUYANA	Guyana Dollar	GYD
HAITI	Gourde	HTG
HAITI	US Dollar	USD
HEARD ISLAND AND McDONALD ISLANDS	Australian Dollar	AUD
HOLY SEE (THE)	Euro	EUR
HONDURAS	Lempira	HNL
HONG KONG	Hong Kong Dollar	HKD
HUNGARY	Forint	HUF
ICELAND	Iceland Krona	ISK
INDIA	Indian Rupee	INR
INDONESIA	Rupiah	IDR
INTERNATIONAL MONETARY FUND (IMF)	SDR (Special Drawing Right)	XDR
IRAN (ISLAMIC REPUBLIC OF)	Iranian Rial	IRR
IRAQ	Iraqi Dinar	IQD
IRELAND	Euro	EUR
ISLE OF MAN	Pound Sterling	GBP
ISRAEL	New Israeli Sheqel	ILS
ITALY	Euro	EUR
JAMAICA	Jamaican Dollar	JMD
JAPAN	Yen	JPY
JERSEY	Pound Sterling	GBP
JORDAN	Jordanian Dinar	JOD
KAZAKHSTAN	Tenge	KZT
KENYA	Kenyan Shilling	KES
KIRIBATI	Australian Dollar	AUD
KOREA (THE DEMOCRATIC PEOPLE'S REPUBLIC OF)	North Korean Won	KPW
KOREA (THE REPUBLIC OF)	Won	KRW
KUWAIT	Kuwaiti Dinar	KWD
KYRGYZSTAN	Som	KGS
LAO PEOPLE'S DEMOCRATIC REPUBLIC (THE)	Kip	LAK
LATVIA	Euro	EUR
LEBANON	Lebanese Pound	LBP
LESOTHO	Loti	LSL
LESOTHO	Rand	ZAR
LIBERIA	Liberian Dollar	LRD
LIBYA	Libyan Dinar	LYD
LIECHTENSTEIN	Swiss Franc	CHF
LITHUANIA	Euro	EUR
LUXEMBOURG	Euro	EUR
MACAO	Pataca	MOP
MACEDONIA (THE FORMER YUGOSLAV REPUBLIC)	Denar	MKD

OF)		
MADAGASCAR	Malagasy Ariary	MGA
MALAWI	Kwacha	MWK
MALAYSIA	Malaysian Ringgit	MYR
MALDIVES	Rufiyaa	MVR
MALI	CFA Franc BCEAO	XOF
MALTA	Euro	EUR
MARSHALL ISLANDS (THE)	US Dollar	USD
MARTINIQUE	Euro	EUR
MAURITANIA	Ouguiya	MRO
MAURITIUS	Mauritius Rupee	MUR
MAYOTTE	Euro	EUR
MEMBER COUNTRIES OF THE AFRICAN DEVELOPMENT BANK GROUP	ADB Unit of Account	XUA
MEXICO	Mexican Peso	MXN
MEXICO	Mexican Unidad de Inversion (UDI)	MXV
MICRONESIA (FEDERATED STATES OF)	US Dollar	USD
MOLDOVA (THE REPUBLIC OF)	Moldovan Leu	MDL
MONACO	Euro	EUR
MONGOLIA	Tugrik	MNT
MONTENEGRO	Euro	EUR
MONTSERRAT	East Caribbean Dollar	XCD
MOROCCO	Moroccan Dirham	MAD
MOZAMBIQUE	Mozambique Metical	MZN
MYANMAR	Kyat	MMK
NAMIBIA	Namibia Dollar	NAD
NAMIBIA	Rand	ZAR
NAURU	Australian Dollar	AUD
NEPAL	Nepalese Rupee	NPR
NETHERLANDS (THE)	Euro	EUR
NEW CALEDONIA	CFP Franc	XPF
NEW ZEALAND	New Zealand Dollar	NZD
NICARAGUA	Cordoba Oro	NIO
NIGER (THE)	CFA Franc BCEAO	XOF
NIGERIA	Naira	NGN
NIUE	New Zealand Dollar	NZD
NORFOLK ISLAND	Australian Dollar	AUD
NORTHERN MARIANA ISLANDS (THE)	US Dollar	USD
NORWAY	Norwegian Krone	NOK

OMAN	Rial Omani	OMR
PAKISTAN	Pakistan Rupee	PKR
PALAU	US Dollar	USD
PALESTINE, STATE OF	No universal currency	
PANAMA	Balboa	PAB
PANAMA	US Dollar	USD
PAPUA NEW GUINEA	Kina	PGK
PARAGUAY	Guarani	PYG
PERU	Nuevo Sol	PEN
PHILIPPINES (THE)	Philippine Peso	PHP
PITCAIRN	New Zealand Dollar	NZD
POLAND	Zloty	PLN
PORTUGAL	Euro	EUR
PUERTO RICO	US Dollar	USD
QATAR	Qatari Rial	QAR
RÉUNION	Euro	EUR
ROMANIA	Romanian Leu	RON
RUSSIAN FEDERATION (THE)	Russian Ruble	RUB
RWANDA	Rwanda Franc	RWF
SAINT BARTHÉLEMY	Euro	EUR
SAINT HELENA, ASCENSION AND TRISTAN DA CUNHA	Saint Helena Pound	SHP
SAINT KITTS AND NEVIS	East Caribbean Dollar	XCD
SAINT LUCIA	East Caribbean Dollar	XCD
SAINT MARTIN (FRENCH PART)	Euro	EUR
SAINT PIERRE AND MIQUELON	Euro	EUR
SAINT VINCENT AND THE GRENADINES	East Caribbean Dollar	XCD
SAMOA	Tala	WST
SAN MARINO	Euro	EUR
SAO TOME AND PRINCIPE	Dobra	STD
SAUDI ARABIA	Saudi Riyal	SAR
SENEGAL	CFA Franc BCEAO	XOF
SERBIA	Serbian Dinar	RSD
SEYCHELLES	Seychelles Rupee	SCR
SIERRA LEONE	Leone	SLL
SINGAPORE	Singapore Dollar	SGD
SINT MAARTEN (DUTCH PART)	Netherlands Antillean Guilder	ANG
SISTEMA UNITARIO DE COMPENSACION REGIONAL	Sucre	XSU

DE PAGOS "SUCRE"		
SLOVAKIA	Euro	EUR
SLOVENIA	Euro	EUR
SOLOMON ISLANDS	Solomon Islands Dollar	SBD
SOMALIA	Somali Shilling	SOS
SOUTH AFRICA	Rand	ZAR
SOUTH GEORGIA AND THE SOUTH SANDWICH ISLANDS	No universal currency	
SOUTH SUDAN	South Sudanese Pound	SSP
SPAIN	Euro	EUR
SRI LANKA	Sri Lanka Rupee	LKR
SUDAN (THE)	Sudanese Pound	SDG
SURINAME	Surinam Dollar	SRD
SVALBARD AND JAN MAYEN	Norwegian Krone	NOK
SWAZILAND	Lilangeni	SZL
SWEDEN	Swedish Krona	SEK
SWITZERLAND	WIR Euro	CHE
SWITZERLAND	Swiss Franc	CHF
SWITZERLAND	WIR Franc	CHW
SYRIAN ARAB REPUBLIC	Syrian Pound	SYP
TAIWAN (PROVINCE OF CHINA)	New Taiwan Dollar	TWD
TAJIKISTAN	Somoni	TJS
TANZANIA, UNITED REPUBLIC OF	Tanzanian Shilling	TZS
THAILAND	Baht	THB
TIMOR-LESTE	US Dollar	USD
TOGO	CFA Franc BCEAO	XOF
TOKELAU	New Zealand Dollar	NZD
TONGA	Pa'anga	TOP
TRINIDAD AND TOBAGO	Trinidad and Tobago Dollar	TTD
TUNISIA	Tunisian Dinar	TND
TURKEY	Turkish Lira	TRY
TURKMENISTAN	Turkmenistan New Manat	TMT
TURKS AND CAICOS ISLANDS (THE)	US Dollar	USD
TUVALU	Australian Dollar	AUD
UGANDA	Uganda Shilling	UGX
UKRAINE	Hryvnia	UAH
UNITED ARAB EMIRATES (THE)	UAE Dirham	AED
UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND (THE)	Pound Sterling	GBP

UNITED STATES MINOR OUTLYING ISLANDS (THE)	US Dollar	USD
UNITED STATES OF AMERICA (THE)	US Dollar	USD
UNITED STATES OF AMERICA (THE)	US Dollar (Next day)	USN
URUGUAY	Uruguay Peso en Unidades Indexadas (URUIURUI)	UYI
URUGUAY	Peso Uruguayo	UYU
UZBEKISTAN	Uzbekistan Sum	UZS
VANUATU	Vatu	VUV
VENEZUELA (BOLIVARIAN REPUBLIC OF)	Bolivar	VEF
VIET NAM	Dong	VND
VIRGIN ISLANDS (BRITISH)	US Dollar	USD
VIRGIN ISLANDS (U.S.)	US Dollar	USD
WALLIS AND FUTUNA	CFP Franc	XPF
WESTERN SAHARA	Moroccan Dirham	MAD
YEMEN	Yemeni Rial	YER
ZAMBIA	Zambian Kwacha	ZMW
ZIMBABWE	Zimbabwe Dollar	ZWL
ZZ01_Bond Markets Unit European_EURCO	Bond Markets Unit European Composite Unit (EURCO)	XBA
ZZ02_Bond Markets Unit European_EMU-6	Bond Markets Unit European Monetary Unit (E.M.U.-6)	XBB
ZZ03_Bond Markets Unit European_EUA-9	Bond Markets Unit European Unit of Account 9 (E.U.A.-9)	XBC
ZZ04_Bond Markets Unit European_EUA-17	Bond Markets Unit European Unit of Account 17 (E.U.A.-17)	XBD
ZZ06_Testing_Code	Codes specifically reserved for testing purposes	XTS
ZZ07_No_Currency	The codes assigned for transactions where no currency is involved	XXX
ZZ08_Gold	Gold	XAU
ZZ09_Palladium	Palladium	XPD

ZZ10_Platinum	Platinum	XPT
ZZ11_Silver	Silver	XAG

#### Appendix 6: Business activity Codes

Codes	Description
<b>CBC501</b>	Research and Development
<b>CBC502</b>	Holding or managing intellectual property
<b>CBC503</b>	Purchasing or Procurement
<b>CBC504</b>	Manufacturing or Production
<b>CBC505</b>	Sales, Marketing or Distribution
<b>CBC506</b>	Administrative, Management or Support Services
<b>CBC507</b>	Provision of services to unrelated parties
<b>CBC508</b>	Internal group finance
<b>CBC509</b>	Regulated Financial Services
<b>CBC510</b>	Insurance
<b>CBC511</b>	Holding shares or other equity instruments
<b>CBC512</b>	Dormant
<b>CBC513</b>	Other3

CBC 513 – Other should only be selected, in case the business activities of the Constituent Entity cannot be accurately reflected through the selection of one or more of the other codes. In case the CBC513 –Other code is selected, further information as to the business activities of the Constituent Entity is to be provided in the Other Entity Info element. Care should be given that, in instances where the BizActivities element is corrected, an according correction is also carried out in the Other Entity Info element, in case related information has been provided in that element.