



States of Guernsey Income Tax

Country by Country Reporting –Constituent Entity Reporting Deadline

Bulletin 2020/3

This Bulletin is issued under the provisions of Regulation 10 of The Income Tax (Approved International Agreements) (Implementation) (Country by Country Reporting) Regulations, 2016 ("[the CbCR Regulations](#)")

Amendment to the Guernsey Income Tax Filing and Constituent Entity Notification Deadline

The Revenue Service has closely monitored the situation with regards to the COVID-19 pandemic and is conscious of the extenuating circumstances caused by the Coronavirus situation and the difficulties presented in the submission of the calendar year 2019 income tax return by the filing deadline of 30 November 2020. A decision has therefore been made to extend the filing deadline of the Guernsey Income Tax Returns (for the calendar year 2019) to 28 February 2021, as published [here](#).

It is also noted that an entity must notify the Director by 30 November in the year following the last day of the accounting period if it is a constituent entity on an MNE group but is not the Ultimate Parent Entity nor the Surrogate Parent Entity in accordance with the Notification requirements contained in Schedule 1, paragraph 2(2) of the CbCR Regulations. The Director also requires this notification, along with details of the reporting entity for the MNE group, together with the country of tax residence for the reporting entity and their accounting period to be made on the company annual tax return in accordance with the [CbCR Reporting Guidance](#).

In view of the decision to extend the Income Tax filing deadline for the 2019 return the Director has also deferred the constituent entity notification deadline to 28 February 2021.

For the avoidance of doubt, the above transitional amendment to the Constituent Entity Notification deadline only applies to Consistent Entity Notifications required by the 30 November 2020. Further, it does not affect the Notification deadlines applicable to Ultimate Parent Entities and Surrogate Parents Entities as detailed in Schedule 1, paragraph 2(1) of the CbCR Regulations. Likewise, there is no change to the Filing Obligations for CbC reports as detailed in paragraph 1(1) of Schedule 1 of the CbCR Regulations.

Should you have any questions concerning the above please refer them to: aeoi_compliance@gov.gg

4 November 2020