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COUNTRY-BY-COUNTRY REPORTING

On March 29th, 2017 Tax Administration issued a notice to taxpayers regarding the submission of Country-by-Country Reports (CbCR) in year 2017.

CBCR is report by countries of international companies whose consolidated revenues in year 2015 and after exceeding the amount of 750 million \in . The report is generally prepared by ultimate owner (parent).

Entities of the international group who exceeds that threshold, and who are residents of the Republic of Croatia, have to, for the fiscal year beginning January 1st, 2016 or after that date, during year 2017, provide following information to Tax Administration:

- 1. Within four months whether the Croatian resident is the ultimate parent company or a substitute parent company or an integral entity that is required to prepare CbC report on behalf of the group
- 2. Within four months to inform about the identity and the tax residency of company obligated to submit a CbC report on behalf of the group
- 3. Within 12 months <u>the ultimate parent</u> company shall submit a CbC report. Exceptionally, a company, resident of the Republic of Croatia, which is not the ultimate parent of the group, but is obliged under Art. 102. Of Ordinance on the automatic exchange of information in the field of tax, to file a CbC report. The first report is submitted for the fiscal year beginning January 1st, 2017 or after that date.

Notifications referred to in point 1 and 2 shall be submitted by post to the Ministry of Finance, Tax Administration, Central Office, Department for normative activities and international cooperation, Boškovićeva 5, 10 000 Zagreb.

CbC Reports shall be submitted by via Internet on which a notice will be published on the official website of the Tax Administration.

BENKO KOTRULJIĆ Ltd. April 7, 2017



