

The deadline for submission of the notification (CbC-P) regarding Country-by-Country reporting is coming

By March 31, 2022, all entities operating in Poland whose fiscal year corresponds to the calendar year and belonging to capital groups that are subject to CbC reporting (*Country-by-Country Report*, CbC-R obligation) are obliged to submit the CbC-P notification for 2021 to the Head of the National Revenue Administration (KAS).

CbC Reporting:

CAPITAL GROUPS SUBJECT TO THE CBC OBLIGATION

Pursuant to the Act on Exchange of Tax Information with Other Countries, the **CbC obligation applies to groups of entities** whose consolidated revenue in the **previous fiscal year** exceeded **PLN 3,250 million** (if the group prepares consolidated financial statements in PLN) or **EUR 750 million** or its equivalent (in other cases).

The CbC reporting obligation generally rests with the parent company, or the entity designated to prepare and report the information for the group as a whole.

At the same time, it must not be forgotten that the other entities within the group have their own obligation. If the CbC reporting obligation is confirmed, such entities are required to submit their own CbC-P notifications.

By submitting a CbC-P notification, entities indicate the CbC reporting entity, its identifying information, and the state or territory in which the information will be reported.

WHAT IS THE DEADLINE FOR SUBMITTING A CBC-P NOTIFICATION?

The CbC-P notification shall be submitted **within 3 months of the end of the reporting fiscal year of the group of entities.**

Entities, with a group reporting year corresponding to the calendar year are required to file the CbC-P notification for 2021 by March 31, 2022.

IN WHAT FORM IS THE CBC-P NOTIFICATION SUBMITTED?

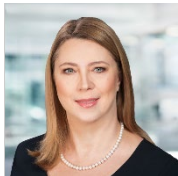
The CbC-P report shall be submitted exclusively in electronic form using the *e-Deklaracje* system.

CONSEQUENCES OF A FAILURE TO COMPLY

According to the Act on Exchange of Tax Information with Other Countries, a taxpayer who has not fulfilled the obligation to submit the CBC-P notification or has submitted a notification that is incomplete or inconsistent with the data held faces a **penalty of up to PLN 1 million.**

This document was prepared for informational purposes only and is of a general nature. Every time before taking actions on the basis of the presented information, we recommend obtaining a binding opinion of TPA Poland experts.

CONTACT



Joanna Kubińska

Associate Partner, Head of Transfer Pricing

+ 48 502 184 882

joanna.kubinska@tpa-group.pl

TPA is a leading international consulting group, offering comprehensive business advisory services in 12 countries of Central and Southeastern Europe.

In Poland, TPA is one of the largest consulting companies. We provide international corporations and large domestic companies with effective business solutions in terms of tax advisory, accounting and payroll outsourcing, real estate investment consultancy and HR consulting, as well as audit, business advisory services under the **Baker Tilly TPA** brand. Legal services, provided under the **Baker Tilly Woroszylska Legal** brand, have been a natural addition to our interdisciplinary services.

TPA Poland, Baker Tilly TPA, and Baker Tilly Woroszylska Legal are **the exclusive representatives of Baker Tilly International in Poland** – one of the largest global networks of independent consulting companies.

As a member of Baker Tilly International, we combine advantages of integrated, interdisciplinary ‘one-stop-shop’ services with local expertise and global reach of the advisory group.

www.tpa-group.pl | www.bakertilly.pl



Stay up to date >>> [subscribe to our newsletter!](#)