Global Tax Alert

Cypriot Tax Department announces extension of deadlines for DAC6 submissions

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On 3 February 2021, the Cypriot Tax Department (CTD) issued an <u>announcement</u> which provides for an extension of the deadlines for the submission of information on reportable cross-border tax arrangements under the European Union (EU) Directive on the mandatory disclosure and exchange of information (referred to as DAC6 or the Directive).

The Directive is yet to be transposed into the Cypriot Law on Administrative Cooperation in the field of Taxation. As a consequence of the delay in the transposition, certain deadlines under the Directive have already expired. Accordingly, the CTD has announced the extension of the deadlines for the submission of reports under DAC6 until 31 March 2021, for the following cases:

- ▶ Reportable cross-border arrangements that have been made (i.e., of which the first step of implementation has taken place) between 25 June 2018 and 30 June 2020 (i.e., within the transitional period of the Directive) and has to be submitted by 28 February 2021.
- ▶ Reportable cross-border arrangements that have been made (i.e., that were made available for implementation or were ready for implementation or the first step in the implementation has been made or for which aid, assistance or advice has been provided by a secondary intermediary) between 1 July 2020 and 31 December 2020 (i.e., within the six-month deferral period of the Directive) and had to be submitted by 31 January 2021.



- ► Reportable cross-border arrangements made between 1 January 2021 and 28 February 2021 (i.e., within the normal application period of the Directive) that had to be submitted within 30 days beginning on the day after they were made available for implementation or were ready for implementation or when the first step in the implementation has been made, whichever occurred first.
- ► Reportable cross-border arrangements for which secondary intermediaries provided aid, assistance or advice, between 1 January 2021 and 28 February 2021 (i.e., within the normal application period of the Directive), and had to submit information within 30 days beginning on the day after they provided aid, assistance or advice.

Practically, this means that for all reportable crossborder arrangements that will be made (i.e., that will be made available for implementation or will be ready for implementation or the first step in the implementation will be made or for which aid, assistance or advice will be provided by a secondary intermediary) as of 1 March 2021 onwards, information will need to be submitted to the CTD for DAC6 purposes within 30 days from the date of the specific triggering event that applies.

As per the same announcement, the CTD also clarified that the Directive is expected to be transposed into the national legislation in February 2021.

On 5 January 2021, the CTD issued two previous announcements on DAC6.

The <u>first announcement</u> referred to the opening of the registration process for intermediaries and relevant taxpayers to the "Ariadne" government portal for DAC6 purposes.

The <u>second announcement</u> referred to the definition of a reportable cross-border arrangement, the information that should be disclosed for DAC6 purposes, the reporting deadlines in Cyprus, as well as provided guidance on the submission of DAC6 XML reports through the "Ariadne" portal.

For additional information with respect to this Alert, please contact the following:

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