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# Global Tax Alert

News from Americas Tax Center  
and Transfer Pricing

## Peruvian tax authorities postpone deadline for filing 2017 and 2018 country-by-country reports

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In Ruling No. 054-2019 (14 March 2019), the Peruvian tax authorities postponed the deadline for filing country-by-country (CbC) reports for tax years 2017 and 2018 for Peruvian taxpayers that are members of a multinational enterprise (MNE) group whose ultimate parent entity (UPE) is a nonresident related party.

For tax year 2017, the postponement only applies to those taxpayers resident in Peru that had to submit the CbC report because the jurisdiction of the UPE's residence has an international treaty or decision of the Andean Community (i.e., a free trade area comprising Bolivia, Colombia, Ecuador and Peru) in effect with Peru that authorizes the exchange of tax information, but does not have a qualifying competent authority agreement in effect with Peru for the exchange of the CbC report.

For tax year 2018, the postponement applies to:

- ▶ Taxpayers whose nonresident parent entity is not required to file the CbC report in their jurisdiction of residence
- ▶ Taxpayers resident in Peru that had to submit the CbC report because the jurisdiction of the parent's residence has an international treaty or Andean Community decision in effect with Peru authorizing the exchange of tax information, but does not have a qualifying competent authority agreement in effect with Peru for the exchange of the CbC report

- Taxpayers with a UPE resident in a jurisdiction (i) with an international treaty or Andean Community decision (ii) with an agreement in effect between competent authorities and (iii) in which systematic failure of the tax information exchange has been communicated by Peruvian tax authorities to the taxpayer resident in Peru

The deadline for submitting CbC reports for both tax years will be the last business day of the month following the month in which Peruvian tax authorities publish on the department's website that Peru has met the standard of confidentiality and security for information, as required by the Organisation for Economic Co-operation and Development.

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