

SITUATION

Source system

Since 1 January 2016, the OECD Action Plan represents (BEPS – Base erosion and profit shifting) additional forwardlooking statements to the transfer pricing documentation of multinational corporations. Supplementary to previous requirements, the BEPS Action Point 13 calls for the country-by-country reporting (CBCR). The transfer pricing documentation was extended to a threetiered documentation approach. This OECD guideline has already been transposed into national law in most countries

The OECD provides a standardized XML-structure which is relevant to all participating states. This is intended to standardize country-by-country data to enable an automated exchange between the States involved. To this XML-structure, the OECD posted a corresponding user guide¹ on 22 March 2016. The updated version 2.0 has been available since June 27, 2019.

¹Country-by-Country Reporting XML Scheme: User Guide for Tax Administration and Taxpayers, OECD.

CHALLENGE

Validation

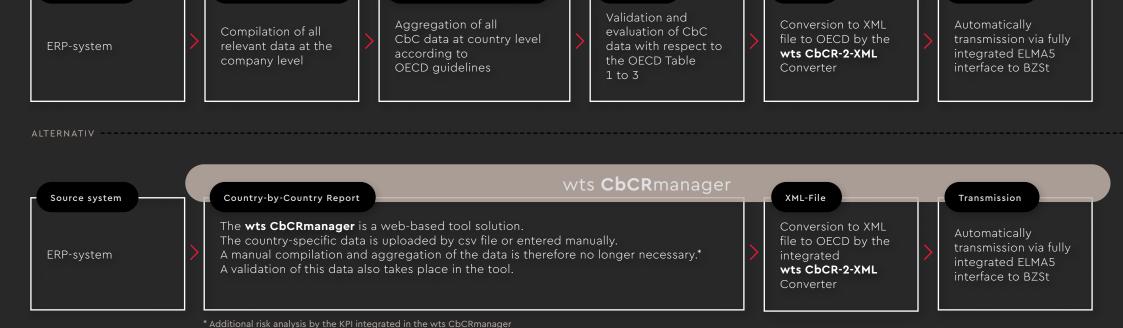
The User Guide for the XML structure published by the OECD is complex in content and sometimes unclear. In addition, the requirements of the XML scheme and the User Guide exceeded the sample tables 1 to 3 in annex III of Action Point 13 on the CbCR. Thus a high degree of cooperation between tax and IT experts is necessary to meet OECD requirements. The reason for this is the required expertise in relation to pricing (especially CbCR) and programming in the area of Extensible Markup Language (XML).

XML-File

Transmission

TRANSMISSION PROCESS: COUNTRY-BY-COUNTRY REPORTING

Report on Entity Level



Country-by-Country Report



OUR IT SOLUTION:

WTS CBCR-2-XML

Our portal is fully compliant with the OECD and German requirements for the mandatory XML-files. The WTS CbCR-2-XML covers all specifications for a transmission of the data from the tables 1–3 in the required data structure. The existing already validated CbCR-data will be uploaded via standardized Excel-file into the WTS CbCR-2-XML portal by entering additional user data into a web browser. In the next step the portal transforms the data of the imported files into the required XML-structure of the OECD and the German BZSt. Then, the converted file can be transmitted via the fully integrated ELMA5 to the German tax authority BZSt. In addition the current status of the XML-file validation will be available in our online-tool at any time. The portal also covers the requirements for countries that require conversion in accordance with the OECD standard (OECD pure).

The CbCR-2-XML portal complements our service portfolio in the context of CbCR. We at WTS continue to offer an independent tool solution that enables data validation and risk analysis in addition to the submission of data (WTS CbCRmanager). In addition, WTS offers an integrated solution to support the entire transfer pricing documentation process (WTS TPmanager).

YOUR BENEFITS AT A GLANCE

The CbCR-2-XML portal offers the following benefits for reportable companies:

- 1. Low requirements for the initial data format; an Excel-based import template is sufficient as the basis for the data and information to be converted
- 2. Avoidance of input and conversion errors due to automated transfer to the correct data structure
- 3. Compliance with OECD and German BZSt requirements

- 4. WTS does not store any data when using the CbCR-2-XML
- 5. The CbCR-2-XML portal is hosted on WTS servers in Germany
- 6. Automatically transmission via fully integrated ELMA5 interface to BZSt and status update within the tool
- 7. Additional option of preparing an individual risk report based on the submitted CbCR-data

Risk report by WTS

In addition to our online tool, WTS offers an individual risk report in relation to your CbCR-data.

wts.com/cbcr-2-xml

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