

# Serbia

## Overview of CbC reporting requirements

***Serbia has implemented the BEPS Action 13 (CbC reporting) minimum standard with five recommendations for improvement.***

First reporting fiscal year: Commencing on or after 1 January 2020

Consolidated group revenue threshold: EUR 750 million

Filing deadline: 12 months following the end of the reporting fiscal year

Local filing required: No

Surrogate parent entity filing permitted: No

First review of the domestic legal framework: 2020/2021

## Summary of recommendations

Area of implementation	Recommendations for improvement
Domestic legal and administrative framework	It is recommended that Serbia take steps to implement legislation or guidance to set out the requirements as to the form and content a CbC report.
Exchange of information framework	It is recommended that Serbia take steps to have qualifying competent authority agreements in effect with jurisdictions of the Inclusive Framework that meet the confidentiality, consistency and appropriate use conditions and with which Serbia has an international exchange of information agreement in effect that allows for the automatic exchange of tax information. It is recommended that Serbia take steps to implement the necessary processes or written procedures to ensure that the exchange of information is conducted in a manner consistent with the terms of reference relating to the exchange of information framework.
Appropriate use	It is recommended that Serbia take steps to ensure that the appropriate use condition is met ahead of the first exchanges of information.

## The domestic legal and administrative framework

Serbia's 2018/2019 review recommended that Serbia take steps to implement a domestic legal and administrative framework to impose and enforce CbC reporting requirements as soon as possible. Serbia has legislation in effect which implements a filing requirement which applies to all Ultimate Parent Entities of MNE Groups above a certain threshold and which requires inclusion of all constituent entities. This recommendation is therefore removed.<sup>1</sup>

A CbC reporting filing obligation applies in Serbia for fiscal years commencing on or after 1 January 2020 and filing is required 12 months after the reporting year end. Serbia has enforcement requirements to ensure compliance with rules on CbC reporting.

Serbia's legislation does not specify the form and content of the CbC report. It is recommended that Serbia take steps to implement legislation or guidance to set out the requirements as to the form and content of a CbC report.

Serbia's domestic legal and administrative framework meets all other terms of reference.

## The exchange of information framework

Serbia has no bilateral relationships in place for the exchange of CbC reports nor processes to ensure that the exchange of information is conducted in a manner consistent with the terms of reference relating to the exchange of information framework.

It is recommended that Serbia take steps to have qualifying competent authority agreements in effect with jurisdictions of the Inclusive Framework that meet the confidentiality, consistency and appropriate use conditions and with which Serbia has an international exchange of information agreement in effect that allows for the automatic exchange of tax information. This recommendation remains in place since the 2018/2019 peer review.

It is recommended that Serbia take steps to implement the necessary processes or written procedures to ensure that the exchange of information is conducted in a manner consistent with the terms of reference relating to the exchange of information framework. This recommendation remains in place since the 2018/2019 peer review.

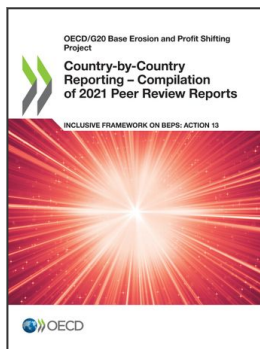
## Appropriate use of CbC reports

Serbia does not yet have controls in place to ensure the appropriate use of CbC reports.

It is recommended that Serbia take steps to ensure that the appropriate use condition is met ahead of the first exchanges of information. This recommendation remains in place since the 2018/2019 peer review.

## Notes

<sup>1</sup> [https://www.paragraf.rs/izmene\\_i\\_dopune/061219-zakon-o-izmenama-i-dopunama-zakona-o-porezu-na-dobit-pravnih-lica.html](https://www.paragraf.rs/izmene_i_dopune/061219-zakon-o-izmenama-i-dopunama-zakona-o-porezu-na-dobit-pravnih-lica.html).



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