South Africa

Overview of CbC reporting requirements

South Africa has fully implemented the BEPS Action 13 (CbC reporting) minimum standard and meets all of the terms of references.

First reporting fiscal year: Commencing on or after 1 January 2016 Consolidated group revenue threshold: ZAR 10 billion Filing deadline: 12 months following the end of the reporting fiscal year Local filing required: Yes Surrogate parent entity filing permitted: No First review of the domestic legal framework: 2017/2018

Summary of recommendations

Area of implementation	Recommendations for improvement
Domestic legal and administrative framework	None.
Exchange of information framework	None.
Appropriate use	None.

The domestic legal and administrative framework

South Africa confirms that its rules have not changed and continue to be applied effectively. South Africa continues to meet all terms of reference.¹

The exchange of information framework

South Africa confirms that its rules have not changed and continue to be applied effectively. South Africa continues to meet all terms of reference.

Appropriate use of CbC reports

South Africa confirms that its rules have not changed and continue to be applied effectively. South Africa continues to meet all terms of reference.

Notes

¹ South Africa's 2017/2018 peer review included a monitoring point for South Africa to issue an updated interpretation or clarification of the definitions of "Revenues – Unrelated Party" and "Revenues – Related Party" within a reasonable timeframe to ensure consistency with OECD guidance. South Africa has amended the relevant guidance to refer directly to definitions in OECD guidance and therefore this monitoring point is removed.



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