# Sweden

1. Sweden was reviewed as part of the 2017/2018 and the 2018/2019 peer reviews. This report is supplementary to those previous reports (OECD, 2019[1]) (OECD, 2018[2]).

2. The first filing obligation for a CbC report in Sweden applies to reporting fiscal years commencing on or after 1 January 2016.

## Summary of key findings

3. Sweden's implementation of the Action 13 minimum standard meets all applicable terms of reference (OECD, 2017[3]).

## Part A: The domestic legal and administrative framework

4. Sweden has laws in place for implementing the BEPS Action 13 minimum standard establishing the necessary requirements.

### *(a) Parent entity filing obligation*

5. No changes were identified.

### *(b) Scope and timing of parent entity filing*

6. No changes were identified.

### *(c) Limitation on local filing obligation*

7. No changes were identified.[1]

### *(d) Limitation on local filing in case of surrogate filing*

8. No changes were identified.

### *(e) Effective implementation*

9. No changes were identified.

### *Conclusion*

10. Sweden meets all the terms of reference relating to the domestic legal and administrative framework.

## Part B: The exchange of information framework

### *(a) Exchange of information framework*

11. As of 31 March 2020, Sweden has 65 bilateral relationships, including those activated under the CbC MCAA, under bilateral CAAs and under the EU Council Directive (2016/881/EU). Within the context of its international exchange of information agreements that allow automatic exchange of information, Sweden has taken steps to have qualifying competent authority agreements in effect with jurisdictions of

the Inclusive Framework that meet the confidentiality, consistency and appropriate use conditions.[2] Regarding Sweden's exchange of information framework, no inconsistencies with the terms of reference were identified.

#### *(b) Content of information exchanged*

12. No changes were identified.

#### *(c) Completeness of exchanges*

13. No changes were identified.

#### *(d) Timeliness of exchanges*

14. No changes were identified.

#### *(e) Temporary suspension of exchange or termination of QCAA*

15. No changes were identified.

#### *(f) Consultation with other Competent Authority before determining systemic failure or significant non-compliance*

16. No changes were identified.

#### *(g) Format for information exchange*

17. No changes were identified.

#### *(h) Method for transmission*

18. No changes were identified.

#### *Conclusion*

19. Sweden meets all the terms of reference regarding the exchange of information.

## Part C: Appropriate use

#### *Appropriate use*

20. No changes were identified.

### *Conclusion*

21. Sweden meets all the terms of reference relating to appropriate use of CbC reports.

## Summary of recommendations on the implementation of country-by-country reporting

| Aspect of the implementation that should be improved | | Recommendation for improvement |
|---|---|---|
| Part A | Domestic legal and administrative framework | - |
| Part B | Exchange of information framework | - |
| Part C | Appropriate use | - |

## References

OECD (2019), *Country-by-Country Reporting – Compilation of Peer Review Reports (Phase 2): Inclusive Framework on BEPS: Action 13*, OECD/G20 Base Erosion and Profit Shifting Project, OECD Publishing, Paris, https://dx.doi.org/10.1787/f9bf1157-en. [1]

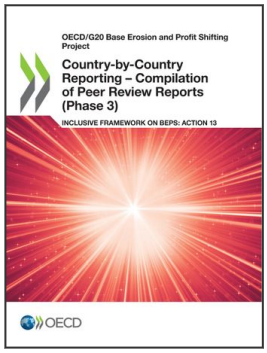
OECD (2018), *Country-by-Country Reporting – Compilation of Peer Review Reports (Phase 1): Inclusive Framework on BEPS: Action 13*, OECD/G20 Base Erosion and Profit Shifting Project, OECD Publishing, Paris, https://dx.doi.org/10.1787/9789264300057-en. [2]

OECD (2017), *Terms of reference for the conduct of peer review of the Action 13 minimum standard on country-by-country reporting*, OECD Publishing, https://www.oecd.org/tax/beps/beps-action-13-on-country-by-country-reporting-peer-review-documents.pdf. [3]

## Notes

[1] Sweden's 2017/2018 peer review included a monitoring point relating to the conditions under which local filing may be required (paragraph 8 (c) iv. b) of the terms of reference). This monitoring point remains in place.

[2] No inconsistency with the terms of reference will be identified where a QCAA is not in effect with one or more jurisdictions of the Inclusive Framework that meet the confidentiality, consistency and appropriate use conditions, but this is due to circumstances that are not under the control of the reviewed jurisdiction. This may include, for example, where the other jurisdiction intends to exchange CbC reports using the MCAA but it does not have the Convention in effect for the relevant fiscal period, or where the other jurisdiction has declined to have a QCAA in effect with the reviewed jurisdiction




**From:**

# Country-by-Country Reporting – Compilation of Peer Review Reports (Phase 3)

## Inclusive Framework on BEPS: Action 13

**Access the complete publication at:**
https://doi.org/10.1787/fa6d31d7-en

**Please cite this chapter as:**

OECD (2020), "Sweden", in *Country-by-Country Reporting – Compilation of Peer Review Reports (Phase 3) : Inclusive Framework on BEPS: Action 13* , OECD Publishing, Paris.

DOI: https://doi.org/10.1787/c8227ebd-en

This work is published under the responsibility of the Secretary-General of the OECD. The opinions expressed and arguments employed herein do not necessarily reflect the official views of OECD member countries.

This document, as well as any data and map included herein, are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area. Extracts from publications may be subject to additional disclaimers, which are set out in the complete version of the publication, available at the link provided.

The use of this work, whether digital or print, is governed by the Terms and Conditions to be found at http://www.oecd.org/termsandconditions.