

Montenegro

Overview of CbC reporting requirements

Montenegro has implemented a domestic legal and administrative framework for CbC reporting and a review of this will be included in the next peer review report.

Summary of recommendations

Area of implementation	Recommendations for improvement
Domestic legal and administrative framework	A review of Montenegro's domestic legal and administrative framework will be undertaken as part of the next BEPS Action 13 peer review.
Exchange of information framework	It is recommended that Montenegro 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 Montenegro has an international exchange of information agreement in effect that allows for the automatic exchange of tax information. It is recommended that Montenegro 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 Montenegro take steps to ensure that the appropriate use condition is met ahead of the first exchanges of information.

The domestic legal and administrative framework

Montenegro has introduced a CbC reporting filing requirement, as required under the BEPS Action 13 (CbC reporting) minimum standard. It has not been possible to carry out a review of this legislation for this peer review. The recommendation for Montenegro to implement legislation is therefore removed and review of the legislation will take place next year.

The exchange of information framework

Montenegro 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.

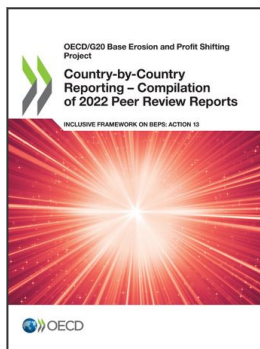
It is recommended that Montenegro take steps to have qualifying competent authority agreements in effect with jurisdictions of the Inclusive Framework that meet the confidentiality, consistency and appropriate use conditions and with which Montenegro has an international exchange of information agreement in effect that allows for the automatic exchange of tax information.

It is recommended that Montenegro 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 of CbC reports

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

It is recommended that Montenegro take steps to ensure that the appropriate use condition is met ahead of the first exchanges of information.



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