F. No. 370142/25/2017-TPL

Government of India
Ministry of Finance
Department of Revenue
Central Board of Direct Taxes
TPL Division

New Delhi, Dated 25th October, 2017

Order under section 119 of the Income-tax Act, 1961 ('the Act')

In keeping with India's commitment to implement the recommendations of 2015 Final Report on Action 13, titled "Transfer Pricing Documentation and Country-by-Country Reporting", identified under the OECD Base Erosion and Profit Shifting (BEPS) Project, section 286 of the Income-tax Act, 1961 ('the Act') was inserted vide Finance Act, 2016, providing for furnishing of a Country-by-Country report (CbCR) in respect of an international group by its constituent or parent entity. Under sub-section (2) of section 286 of the Act, the 'due date' for furnishing the Country-by-Country Report is the date specified under section 139(1) for furnishing the return of income for the relevant accounting year.

FY 2016-17 will be the first reporting year for furnishing of CbCR. The rules for furnishing of CbCR are also still under consideration.

On consideration of the matter, the Central Board of Direct Taxes, in exercise of its powers conferred under section 119 of the Act, in respect of all assessees covered under subsection (2) of section 286 of the Act, hereby extends the 'due date' prescribed therein for furnishing of report in respect of international group for reporting accounting year 2016-17 to 31st March, 2018.

(Sanyam Suresh Joshi) DCIT (OSD) (TPL)-I

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