India: Central Board of Direct Taxes: New rules impact country-by-country reporting (CbCR) and master file compliance

In October, the <u>Central Board of Direct Taxes</u> issued final rules on CbCR by multinational corporations with a consolidated revenue equal to or above Rs 5,500 crore (approximately US\$ 850 million). The rules also include master file requirements for international subsidiaries with a consolidated revenue of at least Rs 500 crore (approximately US \$77 million) - this is lower than Organisation for Economic Cooperation and Development (OECD) recommendations. The master file must contain detailed operating and financial information.

The rules are part of India's efforts to implement the OECD base erosion and profit shifting (BEPS) project.

