



EU public country-by-country reporting tracker



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Last updated: 22 July 2024

Status of transposition across the EU

EU Member States had until 22 June 2023 to transpose the EU's public country-by-country reporting (pCbCR) Directive into national legislation. As at 12 April 2024, nineteen Member States had passed legislation transposing the Directive into national law. A further eight states have published draft legislation.

Optional clauses and penalties

The EU Directive left a number of optional elements allowing individual Member States the choice with respect to domestic implementation:

- An optional deferral of up to a maximum of 5 years where disclosure would be deemed commercially sensitive to the business (a so-called 'safeguard clause'), with an exception for data related to jurisdictions on the EU's list of non-cooperative jurisdictions (the 'black' and 'grey' lists);
- Exemption from publication on the company's website if the report is made publicly available to any third party located in the EU, free of charge, on the website of the official commercial registry.
- In addition, the EU Directive does not provide details on the topic of penalties, instead requiring Member States to impose them. Many territories already have existing penalty regimes associated with CbC reports. The table below provides a high-level overview of where each Member State has adopted the optional elements of the Directive, and where either existing or new penalty regimes are applicable for pCbCR.

Noteworthy divergences

The EU Directive is a minimum standard allowing Member States to expand the scope of the Directive. Where applicable the below table also captures the additional reporting requirements and divergences which are specific to that territory.

Territory: EU Directive

Status of the directive	n/a
Implementation date	22 June 2023
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Member States may allow for one or more specific items of information to be temporarily omitted from the report where their disclosure would be seriously prejudicial to the commercial position of the undertakings to which the report relates.
Parent company not sharing data	Subsidiaries must provide access to a report on all income tax information at their disposal as well as publish a statement indicating that their parent has not made all the information available.
Website publication exemption	Exemption for publishing a full report on the website of UPE or standalone undertaking where the report on income tax information published is simultaneously made accessible to the public in an electronic reporting format which is machine-readable, on the website of the register and free of charge to any third party located within the Union. The company website shall contain information on that exemption and a reference to the website of the relevant register.
Penalties	Requires Member States to impose penalties (no specific definition provided)
Responsible personnel for reporting and penalties	The members of the administrative, management and supervisory bodies of the ultimate parent undertakings or the standalone undertakings, acting within the competences assigned to them under national law, have collective responsibility
Place of publication	Company website and submitted to commercial registry

Language requirements	One of the official languages of the EU
Global revenue threshold	750 million EUR in each of the last two consecutive years
Other noteworthy information	<p>A reporting obligation falls on the ultimate parent if the global revenue threshold is met. For non-EU headquartered companies, the legislation is relevant if they exceed the global revenue threshold and their EU presence includes either medium-sized or large subsidiaries.</p> <p>Medium-sized or large subsidiaries must meet two of the following requirements:</p> <ul style="list-style-type: none"> • Have an average number of employees exceeding 50 • Have a balance sheet greater than EUR 5 million; or • Have net revenue greater than EUR 10 million. <p>A branch simply needs to meet the revenue threshold.</p> <p>Financial institutions established in the EU are already required to publish CbCR under CRDIV. Where these are MNEs which fall within the scope of public CbCR, they will be exempt from reporting.</p>

Legislation links

[EU Directive](#)

Territory: Austria

Status of the directive	Draft law published
Implementation date	To be confirmed
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	<ul style="list-style-type: none">• If the report is not submitted on time, in full or incorrect. Penalties depend on the size classification of the company and range between (up to) 8k and (up to) 10k EUR. If the report is still not submitted after the first penalty, a second penalty depending on size classification and importance to the public can be issued. Penalties can be up to 100k EUR. In addition, an administrative fine for representatives of the company/branch and the auditor is due in case of failure to comply with the regulations (intentionally or through gross negligence). The fine for representatives of a medium sized corporation, branch, or the auditor is up to 20k EUR. For representatives of big corporations the fine is up to 50k EUR, and corporations of public interest, up to 100k EUR.• For the unjustified temporary omission of information, the penalty is up to 20k EUR and the cost of legal fees is to be paid by the company.
Responsible personnel for reporting and penalties	<ul style="list-style-type: none">• Legal representatives.• Companies or branches domiciled in Austria are jointly and severally liable for fines imposed on their representatives.
Place of publication	Company website and submitted to commercial register

Language requirements

- German for UPE and standalone undertakings (with at least one branch in other jurisdictions)
- For subsidiaries and branches one of the official languages of the EU is sufficient

Global revenue threshold

750 million EUR

Other noteworthy information

- The reporting obligation for Austrian subsidiaries only applies to medium-sized or large subsidiaries as defined by local GAAP.
- The threshold applicable to branches is a net turnover 10 million EUR, for the last two consecutive financial years.

Legislation links

[Draft Austrian legislation](#)

Territory: Belgium

Status of the directive	Transposed into local legislation
Implementation date	5 February 2024
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	No
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	A fine between 50 and 10,000 EUR (and/or a prison sentence of up to one year in the case of false or misleading CbC information with fraudulent intent).
Responsible personnel for reporting and penalties	The penalty may be imposed on members of a management body, as well as the persons associated with the management of an establishment in Belgium.
Place of publication	Company website and submitted to commercial registry (National Bank of Belgium)
Language requirements	Likely one of the official languages of the EU (to be determined by Royal Decree)
Global revenue threshold	750 million EUR

Other noteworthy information

- The threshold applicable to branches and small companies is a net turnover 9 million EUR, for the last two consecutive financial years.
- Disaggregated information should not only be published for jurisdictions that are mentioned on the blacklist or greylist, but also for those jurisdictions on the (generally broader) Belgian lists of countries with no or low taxation.
- An exception to the scope not only applies for credit institutions but also for investment companies, management corporations of collective investment undertakings, and listed companies that are subject to similar reporting obligations.
- The form and content of the report will be determined by Royal decree.
- The 750 million EUR and 9 million EUR thresholds can be adjusted by Royal Decree, after consultation in the Council of Ministers and after advice from the Central Economic Council.

Legislation links

[Belgian legislation](#)

Territory: Bulgaria

Status of the directive	Transposed into local legislation
Implementation date	7 December 2023
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	A fine between BGN 2k (approx. EUR 1k) and BGN 15k (approx. EUR 8k) could be imposed on the company for failure to prepare and file a CbC report.
Responsible personnel for reporting and penalties	Not specified
Place of publication	Company website and Bulgarian Trade register
Language requirements	<ul style="list-style-type: none">• Bulgarian (when submitted to Trade register)• One of the official languages of the EU can be used publishing at company website
Global revenue threshold	1.5 Billion BGN

Other noteworthy information n/a

Legislation links [Bulgarian legislation](#)

Territory: Croatia

Status of the directive	Transposed into local legislation
Implementation date	18 July 2023
First year of reporting	1 January 2024
Publication date	12 months after first financial year starting on/after 1 January 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	If a company does not compile and publish the report in accordance with the relevant provisions of the Accounting Act, it will incur a fine in the amount of 1,320 to 13,270 EUR, while a fine of 660 to 2,650 EUR could be imposed on the responsible person at the company.
Responsible personnel for reporting and penalties	Legal representative
Place of publication	Company website and submitted to commercial registry
Language requirements	One of the official languages of the EU
Global revenue threshold	750 million EUR

Other noteworthy information

Public country-by-country reporting in Croatia applies to business years which start on 1 January 2024 or after that date. This is 6 months earlier than the 22 June 2024 date specified under the EU Directive.

Legislation links

[Croatian legislation](#)

Territory: Czechia

Status of the directive	Transposed into local legislation
Implementation date	1 January 2024
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	A fine of up to 3% of assets may be imposed for failure to prepare or publish the report.
Responsible personnel for reporting and penalties	Not specified
Place of publication	Company website and submitted to commercial registry
Language requirements	Czech or English
Global revenue threshold	<ul style="list-style-type: none">• CZK 19,000,000,000 for ultimate parent entities located in the Czech Republic• 750 million EUR for ultimate parent entities located in third countries
Other noteworthy information	n/a

Territory: Denmark

Status of the directive	Transposed into local legislation
Implementation date	22 June 2023
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	Currently, there are no indications of penalties to be imposed for non-compliance as per the implementation guidance. The implementation is made in the Danish Accounts Act (Årsregnskabsloven). According to the Danish Accounts Act the Danish Business Authority can examine the reports in the same way as annual reports. Penalties may be imposed, however this is rarely done. Additionally, the reports are covered by the Business Authorities controls, and thus the Authorities can examine the content of the annual reports and order a correction thereof.
Responsible personnel for reporting and penalties	Not specified
Place of publication	Company website and submitted to commercial registry (Central Business Registry)
Language requirements	Danish and English

Global revenue threshold DKK 5.6 billion - local currency equivalent of 750 million EUR

Other noteworthy information n/a

Legislation links [Danish legislation](#)

Territory: Estonia

Status of the directive	Draft law published
Implementation date	To be confirmed
First year of reporting	22 July 2024
Publication date	12 months after first financial year starting on/after 22 July 2024
Optional deferrals	
Commercially sensitive	
Parent company not sharing data	Yes
Website publication exemption	-
Penalties	<ul style="list-style-type: none">• If the report is not compiled or published in accordance with the relevant provisions the fine may be as high as 3,200 EUR. Tax arrears bear late payment interest (0.06% per day) and 21/79 corporate income tax will be levied on late payments' interest paid.• Failure to submit information to the tax authority intentionally, or submission of false information, is punishable by a fine of up to 32,000 EUR.
Responsible personnel for reporting and penalties	Legal representative
Place of publication	Company website and submitted to commercial registry
Language requirements	Estonian and English
Global revenue threshold	750 million EUR

Other noteworthy information

The law was passed on 2 May 2024. It is understood based on the final wording of the law that the Estonian tax authorities may disclose the information about the submission or non-submission of the CbC report by the taxable person. Given that the articles on CbC report reference the EU directive, it appears that the tax authorities may publish information only about EU reports, however there is no clear guidance/reference materials from the tax authorities on the matter yet.

Legislation links

[Estonian legislation](#)

Territory: Finland

Status of the directive	Transposed into local legislation
Implementation date	1 June 2024
First year of reporting	22 June 2024
Publication date	12 months after first FY starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	<ul style="list-style-type: none">• The board member or the member of the similar body and the CEO of the legal entity are responsible for ensuring, to the best of their knowledge and ability, that the income tax report is drawn up, registered, and made accessible according to the law. This also applies to branch representatives.• If the obligation to register the report on income tax information is neglected, the Patent and Registration Board can oblige the above mentioned person to submit the income tax report for registration within the specified time frame. Threat fines are regulated in the Threat Fines Act. If, despite the request, the income tax report has not been submitted for registration within one year of the end of the accounting period, the Finnish Patent and Registration Board must order the ultimate parent undertaking or subsidiary to be liquidated or removed from the trade register or the branch to be removed from the trade register.• If the registration of the income tax report is intentionally or due to gross negligence neglected within the deadline set for it, the above mentioned person shall be sentenced to a fine for the violation of the registration of the income tax report, unless a more severe punishment is provided for the act elsewhere in the law. No penalty is imposed if the violation is minor.
Responsible personnel for reporting and penalties	Board members or the members of the similar body and CEO (This also applies to branch representatives)

Place of publication Company website and submitted to commercial registry

Language requirements One of the official languages of the EU

Global revenue threshold 750 million EUR

Other noteworthy information In addition to a limited liability company and a partnership where the liable partner is a limited liability company, a cooperative is also obliged to prepare a report.

Legislation links [Finnish legislation](#)

Territory: France

Status of the directive	Transposed into local legislation
Implementation date	22 June 2023
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	<ul style="list-style-type: none">• All companies in scope must file the report with the commercial register• It is uncertain at this time whether the website publication exemption is available to all group companies operating in France if the UPE or selected branch or subsidiary designated to file the report publishes a CbC report on their website. Please refer to other noteworthy information below.
Penalties	No specified set sanction written in the law. However, if a company in scope doesn't comply anybody can ask the Commercial Court to enforce the law to the individual (board member, president, etc.) or body competent for the production, communication, or transmission of the documents or information to provide them, or to appoint a representative responsible for carrying out this communication. When the request is granted, the Court will set a daily penalty applicable for each day the company fails to fulfil its obligation. Any procedural costs shall be borne by the individual or body implicated.
Responsible personnel for reporting and penalties	Legal representative
Place of publication	Company website and submitted to commercial registry

Language requirements	French
Global revenue threshold	750 million EUR
Other noteworthy information	<ul style="list-style-type: none"> • Extended provisions applicable to EU Member States to those in the European Economic Area (EEA). • Article 48(b) paragraph 6 of the EU directive has not been transposed into French legislation. Under these circumstances, qualifying French subsidiaries of a non-EU headquartered group would still need to comply with local French reporting obligations, irrespective of whether the parent or another EU-based group entity publishes and files a global CbC report.

Legislation links [French legislation](#)

Territory: Germany

Status of the directive	Transposed into local legislation
Implementation date	22 June 2023
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	<p>Per German entity or permanent establishment up to 250k EUR for:</p> <ul style="list-style-type: none">• preparation of an incorrect or incomplete pCbCR; or• non-publication, incorrect or not in time publication and if the publication is not made available for at least 5 years <p>No consequences under criminal law.</p>
Responsible personnel for reporting and penalties	Penalties can be raised against the entity / permanent establishment or against its legal representatives.
Place of publication	Commercial register and company website (note on company website that publication has been made in commercial register is sufficient)
Language requirements	German

Global revenue threshold 750 million EUR

Other noteworthy information The commercially sensitive reporting exemption (the 'safeguard clause') is only available for up to 4 years in Germany. This diverges from the EU directive which allowed the reporting exemption for a period of up to a maximum of 5 years.

Legislation links [German legislation](#)

Territory: Greece

Status of the directive	Transposed into local legislation
Implementation date	15 November 2023
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	No
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	Up to 100k EUR (per responsible person) depending on the size of the company.
Responsible personnel for reporting and penalties	<p>A responsible person(s) are defined:</p> <ul style="list-style-type: none">• the members of the administrative, management and supervisory bodies of the UPE or the 'autonomous' companies,• the members of the administrative, management and supervisory bodies of the subsidiaries or the legal representatives of the branches, who act within the limits of their powers, and to the extent they can in a position to know that the tax declaration is prepared in a manner compliant with the legislation.
Place of publication	<p>General Commercial Registry (G.E.MI.) available only in Greek</p> <p>https://publicity.businessportal.gr/</p>
Language requirements	Greek or English

Global revenue threshold 750 million EUR

Other noteworthy information n/a

Legislation links [Greek legislation](#)

Territory: Hungary

Status of the directive	Transposed into local legislation
Implementation date	24 November 2022
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	No
Parent company not sharing data	Yes
Website publication exemption	No
Penalties	None specified. Further announcements are expected to be published at a later date.
Responsible personnel for reporting and penalties	Responsibility in relation to drawing up, publishing, and making accessible the report is in line with the directive. Penalties are not specified.
Place of publication	Company website and commercial registry along with the consolidated financial statements
Language requirements	For UPEs the consolidated financial statements must be prepared in Hungarian. However, it is not explicitly stated that pCbCR should also be prepared in Hungarian. Further announcements are expected to be published at a later date.
Global revenue threshold	<ul style="list-style-type: none">• HUF 275,000,000,000 for ultimate parent entities located in Hungary• 750 million EUR for ultimate parent entities located in third countries

Other noteworthy information

- MNEs must explain any significant differences between tax paid and tax accrued.
- The report for Hungarian UPEs shall be published together with the consolidated financial statements which are due 6 months after the balance sheet date of the financial year. For non-EU headquartered MNEs the publication deadline may be 12 months if the circumstances outlined in the Directive apply.

Legislation links

[Hungarian legislation](#)

Territory: Ireland

Status of the directive	Transposed into local legislation
Implementation date	22 June 2023
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	A person who fails to comply with the provisions of the implementing legislation may be subject to a fine of 5,000 EUR or sentenced to imprisonment for a term not exceeding 6 months.
Responsible personnel for reporting and penalties	<ul style="list-style-type: none">• These penalties extend to company directors, officers, secretaries, and managers and certain other regulated persons who knowingly allow a company to not meet its reporting obligations, or where they are so negligent in their duties.• The enforcement powers rest with the Irish Corporate Enforcement Authority.
Place of publication	Company website and submitted to commercial registry
Language requirements	<ul style="list-style-type: none">• One of the official languages of the EU• Where it is wholly or partly in a language other than English or Irish, it must be accompanied by a translation of the report into English or Irish or both

Global revenue threshold 750 million EUR

Other noteworthy information For MNEs whose pCbCR obligation is governed by the Irish regulations, the report must be filed within 56 days of the company's Annual Return Date (this is specific to each company and can be up to 9 months after a company's financial year end).

Legislation links [Irish legislation](#)

Territory: Italy

Status of the directive	No draft law disclosed to public
Implementation date	-
First year of reporting	-
Publication date	-
Optional deferrals	
Commercially sensitive	-
Parent company not sharing data	-
Website publication exemption	-
Penalties	-
Responsible personnel for reporting and penalties	-
Place of publication	-
Language requirements	-
Global revenue threshold	-
Other noteworthy information	<ul style="list-style-type: none">The only legislative trace in the Italian legal framework is the European Delegation Law ("EDL") for the years 2022-2023, approved on December 20, 2023 by the Italian Chamber of Deputies (No. ACT 1342), and subsequently approved on February, 14 2024 by the Senate of the

Republic (No. ACT 969).

- The approved EDL grants the government the authority to implement various European directives, including the one on Public CbCR (mentioned in the Annex A of the EDL). The EDL has been published, however, no specific details can be gleaned from the analysis of the text of the EDL because its sole content is to authorize the government for future legislation. Further information will become available when a draft of the legislative decree that the government intends to introduce becomes available.

Legislation links

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Territory: Latvia

Status of the directive	Transposed into local legislation
Implementation date	11 October 2023
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	Not specified
Responsible personnel for reporting and penalties	Not specified
Place of publication	Company website and submitted to commercial registry
Language requirements	Latvian
Global revenue threshold	750 million EUR
Other noteworthy information	n/a

Territory: Lithuania

Status of the directive	Transposed into local legislation
Implementation date	22 June 2023
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	Penalties from 600 to 1450 EUR for non-compliance; from 2000 to 6000 EUR for a repetitive breach (Art. 223 of the Code of Administrative Offenses of the Republic of Lithuania)
Responsible personnel for reporting and penalties	Heads of legal entities, their branches or representative offices, foreign legal entities or branches or representative offices of other organizations or other persons indicated in laws or founding documents.
Place of publication	Company website and submitted to commercial registry
Language requirements	One of the official languages of the EU
Global revenue threshold	750 million EUR

Other noteworthy information n/a

Legislation links [Lithuanian legislation](#)

Territory: Luxembourg

Status of the directive	Transposed into local legislation
Implementation date	22 August 2023
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	Penalty between 500 to 25,000 EUR
Responsible personnel for reporting and penalties	Liability for board members
Place of publication	Company website and submitted to commercial register (registre de commerce et des sociétés)
Language requirements	One of the official languages of the EU
Global revenue threshold	750 million EUR
Other noteworthy information	n/a

Territory: Malta

Status of the directive	Transposed into local legislation
Implementation date	17 May 2024
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	No
Penalties	Failure of directors or persons to comply with provisions relating to reporting obligations are liable to a penalty of 2,329.37 EUR and a daily penalty of 46.59 EUR.
Responsible personnel for reporting and penalties	Directors of the ultimate parent undertakings, the standalone undertakings or subsidiary undertakings, acting within the competences assigned to them under national law, have collective responsibility for ensuring that the report on income tax information is drawn up, published and made accessible.
Place of publication	Company website and submitted to the Maltese Registrar of companies
Language requirements	One of the official languages of the EU
Global revenue threshold	750 million EUR

Other noteworthy information n/a

Legislation links [Maltese legislation](#)

Territory: Netherlands

Status of the directive	Transposed into local legislation
Implementation date	6 December 2023
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	No
Penalties	Not complying with this obligation is an economic offense (under the Economic Offenses Act). The maximum penalty for non-compliance with the reporting obligation amounts to 25,750 EUR. Moreover, a community service may be imposed or imprisonment for up to 6 months.
Responsible personnel for reporting and penalties	Not specified
Place of publication	Company website and commercial register (Chamber of Commerce)
Language requirements	One of the official languages of the EU
Global revenue threshold	750 million EUR

Other noteworthy information n/a

Legislation links [Dutch legislation](#)

Territory: Poland

Status of the directive	Transposed into local legislation
Implementation date	17 April 2024
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	No
Penalties	Failure to prepare and submit the report is subject to a fine or imprisonment for up to 2 years.
Responsible personnel for reporting and penalties	Head of the unit (that would be the management board in most cases) and members of the supervisory board or other entity's supervisory body.
Place of publication	Company website and filed with the tax authorities
Language requirements	Polish
Global revenue threshold	750 million EUR (polish equivalent)
Other noteworthy information	n/a

Legislation links

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Territory: Portugal

Status of the directive	Transposed into local legislation
Implementation date	23 August 2023
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	No
Penalties	Failure to prepare, publish, or make available on the website the report and declaration (when applicable) is punishable by a fine of between 1,500 and 30,000 EUR.
Responsible personnel for reporting and penalties	Not specified
Place of publication	On the website of the ultimate parent company or autonomous company.
Language requirements	One of the official languages of the EU
Global revenue threshold	750 million EUR
Other noteworthy information	n/a

Territory: Republic of Cyprus

Status of the directive	Draft law published
Implementation date	To be confirmed
First year of reporting	22 June 2024
Publication date	-
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	No
Penalties	-
Responsible personnel for reporting and penalties	-
Place of publication	-
Language requirements	-
Global revenue threshold	-
Other noteworthy information	-

Legislation links

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Territory: Romania

Status of the directive	Transposed into local legislation
Implementation date	7 September 2022
First year of reporting	1 January 2023
Publication date	12 months after first financial year starting on/after 1 January 2023
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	No specific penalty regime yet.
Responsible personnel for reporting and penalties	The member of the administrative, management, and supervisory bodies are responsible for the preparation and publication of the report.
Place of publication	Company website and submitted to commercial registry
Language requirements	Romanian or one of the official languages of the EU
Global revenue threshold	3.7bn RON
Other noteworthy information	According to the amended wording of the Romanian legislation, groups headquartered outside the EU that have a medium or large subsidiary in Romania are subject to public country-by-country reporting in Romania for

financial years beginning on/after 1 January 2023. These reports are due to be published by 31 December 2024 for groups operating on a calendar year basis. As per recent confirmations the reporting obligation for EU headquartered groups with a presence in Romania is aligned with the EU directive.

Legislation links

Romanian legislation

Territory: Slovakia

Status of the directive	Transposed into local legislation
Implementation date	11 August 2022
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	From 100 to 10,000 EUR for failure to file the report or for the provision of incomplete or inaccurate data.
Responsible personnel for reporting and penalties	According to law, the Company is responsible for reporting.
Place of publication	Company website and submitted to commercial registry
Language requirements	Slovak or one of the official languages of the EU
Global revenue threshold	750 million EUR
Other noteworthy information	The commercially sensitive reporting deferral is provided for by secondary source legislation (Measure to Public Country-by-Country Reporting)

published by the Ministry of Finance of the Slovak Republic. The measure clarifies what information should be disclosed and if disclosure could be postponed under commercial sensitivity grounds.

Legislation links

[Slovak legislation](#)

Territory: Slovenia

Status of the directive	Draft law published
Implementation date	To be confirmed
First year of reporting	22 June 2024
Publication date	12 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	A penalty of 6,000 - 30,000 EUR is imposed if the report is not filed in time and in accordance with provisions of the corresponding law . Additionally, a fine of 300 – 2,500 EUR may be issued to the responsible company representative.
Responsible personnel for reporting and penalties	Not specified
Place of publication	Company website and submitted to commercial registry (AJPES)
Language requirements	Slovene
Global revenue threshold	750 million EUR

Other noteworthy information -

Legislation links -

Territory: Spain

Status of the directive	Transposed into local legislation
Implementation date	22 December 2022
First year of reporting	22 June 2024
Publication date	6 months after first financial year starting on/after 22 June 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	Yes
Penalties	The public CbCR regulation only establishes that the administrators of the ultimate parent entity and local affiliates, as well as the people with compliance and public reporting roles within the branches that have this obligation are collectively responsible for the publication of the CbC information. Based on our understanding, the potential penalty regime that may be applied would be that concerning the preparation and publication of financial statements (as regulated in Corporations Law). However, please take into account that implementing process of the EU public CbCR Directive is still ongoing, the Spanish regulator has not published yet any statement regarding a specific penalty regime that might be applied.
Responsible personnel for reporting and penalties	The members of the administrative, management, and supervisory bodies of the ultimate parent undertakings or the standalone undertakings, acting within the competences assigned to them under national law, have collective responsibility
Place of publication	Company website and submitted to Commercial Registry, along with the Company's financial statements

Language requirements One of the official languages of the EU

Global revenue threshold 750 million EUR

Other noteworthy information Report needs to be filed 6 months after the balance sheet date.

Legislation links [Spanish legislation](#)

Territory: Sweden

Status of the directive	Transposed into local legislation
Implementation date	22 June 2023
First year of reporting	31 May 2024
Publication date	12 months after first financial year starting on/after 31 May 2024
Optional deferrals	
Commercially sensitive	Yes
Parent company not sharing data	Yes
Website publication exemption	No
Penalties	According to the Swedish law there is a possibility to impose a conditional fine in case of late filing. The size of a potential conditional fine is decided on a case-by-case basis and depends on the group's financial situation and other circumstances. Please note that a fine can only be issued if the group did not meet the conditions for the conditional fine (such as new filing date).
Responsible personnel for reporting and penalties	Not specified
Place of publication	Company website and submitted to commercial registry ("Bolagsverket")
Language requirements	<ul style="list-style-type: none">• Company website: any official EU language, Norwegian, or Icelandic• Submission to Bolagsverket: Swedish (If requested by the company, in any official EU language, Norwegian, or Icelandic)
Global revenue threshold	750 million EUR / 8bn SEK

Other noteworthy information -

Legislation links

[Swedish legislation](#)

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