kpmg TaxNewsFlash

United States

No. 2017-270 June 30, 2017

Form 8975 and instructions for country-by-country reporting

The IRS has released final versions of the form and instructions for filing country-bycountry (CbC) reports.

Form 8975, Country-by-Country Report and the Instructions for Form 8975 and Schedule A (Form 8975), Country-by-Country Report, reflect a revision date of June 2017.

U.S. persons that are the ultimate parent entity of a U.S. multinational enterprise (U.S. MNE) group with annual revenue for the preceding reporting period of \$850 million or more are required to file Form 8975.

Form 8975 and Schedules A (Form 8975) are used by those filers required to report annually certain information with respect to the filer's U.S. MNE group on a CbC basis. The filer must report the U.S. MNE group's constituent entities, indicating each entity's:

- Tax jurisdiction (if any)
- Country of organization
- Main business activity
- Financial and employee information for each tax jurisdiction in which the U.S. MNE does business (including revenues, profits, income taxes paid and accrued, stated capital, accumulated earnings, and tangible assets other than cash)

Form 8975 and Schedules A (Form 8975) must be filed with the IRS with the income tax return of the ultimate parent entity of a U.S. MNE group for the tax year in or within which the reporting period covered by the Form 8975 ends.

- Read <u>Form 8975</u> [54 KB]
- Read the instructions [PDF 165 KB]

The information contained in TaxNewsFlash is not intended to be "written advice concerning one or more Federal tax matters" subject to the requirements of section 10.37(a)(2) of Treasury Department Circular 230, as the content of this document is issued for general informational purposes only, is intended to enhance the reader's knowledge on the matters addressed therein, and is not intended to be applied to any specific reader's particular set of facts. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. Applicability of the information to specific situations should be determined through consultation with your tax adviser.

KPMG International is a Swiss cooperative that serves as a coordinating entity for a network of independent member firms. KPMG International provides no audit or other client services. Such services are provided solely by member firms in their respective geographic areas. KPMG International and its member firms are legally distinct and separate entities. They are not and nothing contained herein shall be construed to place these entities in the relationship of parents, subsidiaries, agents, partners, or joint venturers. No member firm has any authority (actual, apparent, implied or otherwise) to obligate or bind KPMG International or any member firm in any manner whatsoever.

Direct comments, including requests for subscriptions, to <u>Washington National Tax</u>. For more information, contact KPMG's Federal Tax Legislative and Regulatory Services Group at + 1 202.533.4366, 1801 K Street NW, Washington, DC 20006-1301.

To unsubscribe from TaxNewsFlash-United States, reply to Washington National Tax.

Privacy | Legal

© 2017 KPMG LLP, a Delaware limited liability partnership and the U.S. member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity. All rights reserved. Printed in the U.S.A.