



**OVERVIEW OF CbCR** Going back in time to 2015 when the Organisation for Economic Co- operation and Development (OECD) released its final report on Action Plan 13, the common consensus among the G20 / OECD member countries was a need for tax authorities to have access to data on global activities of multinational enterprises (MNEs), in order to better allocate their own scarce resources so that MNEs pay their fair share of taxes. The ambitious goal of Action Plan 13 in particular was to combat this need by equipping the tax authorities with vital data for bringing in transparency and thereby, lowering the potential of tax avoidance. Thus, CbCR was introduced to enable the tax administration with information for assessing high-level transfer pricing (TP), and base erosion and profit shifting (BEPS) risks by providing data on MNEs global allocation of income, profits, taxes paid and economic activity among tax jurisdictions.....