

Costa Rica

Overview of CbC reporting requirements

First reporting fiscal year: Commencing on or after 1 January 2017

Consolidated group revenue threshold: EUR 750 million

Filing deadline: 31 December of the year following the reporting fiscal year

Local filing required: No

Surrogate parent entity filing permitted: Yes

First review of the domestic legal framework: 2017/2018

Summary of recommendations

Area of implementation	Recommendations for improvement
Domestic legal and administrative framework	None.
Exchange of information framework	None.
Appropriate use	Not reviewed.

The domestic legal and administrative framework

Costa Rica confirms that its rules have not changed and continue to be applied effectively. Costa Rica continues to meet all terms of reference.

The exchange of information framework

Costa Rica's 2020/2021 peer review included a recommendation to take steps to have the necessary processes in place to ensure timely and accurate exchange of CbC reports. These processes are now in place and this recommendation is removed.

Costa Rica notified some late exchanges of CbC reports after the deadline, due to error. Costa Rica is introducing measures to address the issue underlying this error. As Costa Rica has taken steps to address this issue, no recommendation is made but this aspect will be monitored.

Appropriate use of CbC reports

Costa Rica has notified as a non-reciprocal jurisdiction and, as such, will not receive CbC reports submitted to tax authorities in other jurisdictions. It is therefore not necessary for this peer review evaluation to reach any conclusions with respect to Costa Rica's compliance with the terms of reference on appropriate use.



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