

# Costa Rica

## Overview of CbC reporting requirements

**Costa Rica has implemented the BEPS Action 13 (CbC reporting) minimum standard with two recommendations for improvement.**

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	It is recommended that Costa Rica take steps to ensure that details of reports are recorded and available to ensure complete and timely filing and exchanges of CbC reports.
Appropriate use	None.

## The domestic legal and administrative framework

Costa Rica's 2017/2018 peer review included a recommendation to complete its definition of "Ultimate Parent Entity" to be in line with the terms of reference. This definition has been amended and the recommendation is removed.

Costa Rica's 2017/2018 peer review included a recommendation that Costa Rica amend its rules or otherwise ensure that a CbC report is not filed later than 12 months after the end of the accounting period and not subsequently exchanged more than 15 months after the end of the accounting period with partner jurisdictions. Costa Rica has made a legislative change requiring that all fiscal periods run from 1 January to 31 December each year, bringing the 31 December filing deadline in line with the standard and this recommendation is therefore removed.<sup>1 2 3</sup>

## The exchange of information framework

Costa Rica has not provided details of numbers and timeliness of reports received and exchanged for the period covered by this peer review report. It is recommended that Costa Rica take steps to ensure that details of reports are recorded and available to ensure complete and timely filing and exchanges.

## Appropriate use of CbC reports

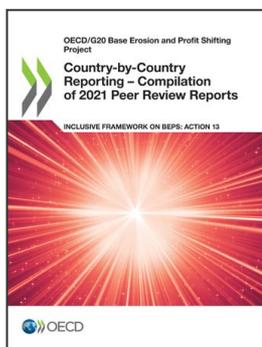
Costa Rica is a non-reciprocal jurisdiction and, as such, will not receive CbC reports submitted to tax authorities in other jurisdictions, and will not apply local filing. It is therefore not necessary for this peer review evaluation to reach any conclusions with respect to compliance with the terms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

## Notes

<sup>1</sup> [https://www.pgrweb.go.cr/SCIJ/Busqueda/Normativa/Normas/nrm\\_texto\\_completo.aspx?nValor1=1&nValor2=10969](https://www.pgrweb.go.cr/SCIJ/Busqueda/Normativa/Normas/nrm_texto_completo.aspx?nValor1=1&nValor2=10969).

<sup>2</sup> Costa Rica's 2017/2018 peer review included a monitoring point for the first year exchanges, to ensure that the filing deadline will not impact the ability of the Costa Rica to meet its obligations relating to the exchange of information under the terms of reference. The first year exchanges are complete and this monitoring point is removed.

<sup>3</sup> Costa Rica's 2017/2018 peer review included a monitoring point relating to the absence of specific processes in place that would allow Costa Rica to take appropriate measures in case it is notified by another jurisdiction that such other jurisdiction has reason to believe that an error may have led to incorrect or incomplete information reporting by a Reporting Entity or that there is non-compliance of a Reporting Entity with respect to its obligation to file a CbC report. This aspect will be further monitored once the actual exchanges of CbC reports will commence. This monitoring point remains in place.



**From:**  
**Country-by-Country Reporting – Compilation of  
2021 Peer Review Reports**  
Inclusive Framework on BEPS: Action 13

**Access the complete publication at:**

<https://doi.org/10.1787/73dc97a6-en>

**Please cite this chapter as:**

OECD (2021), “Costa Rica”, in *Country-by-Country Reporting – Compilation of 2021 Peer Review Reports: Inclusive Framework on BEPS: Action 13*, OECD Publishing, Paris.

DOI: <https://doi.org/10.1787/6c8417ab-en>

This work is published under the responsibility of the Secretary-General of the OECD. The opinions expressed and arguments employed herein do not necessarily reflect the official views of OECD member countries.

This document, as well as any data and map included herein, are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area. Extracts from publications may be subject to additional disclaimers, which are set out in the complete version of the publication, available at the link provided.

The use of this work, whether digital or print, is governed by the Terms and Conditions to be found at <http://www.oecd.org/termsandconditions>.