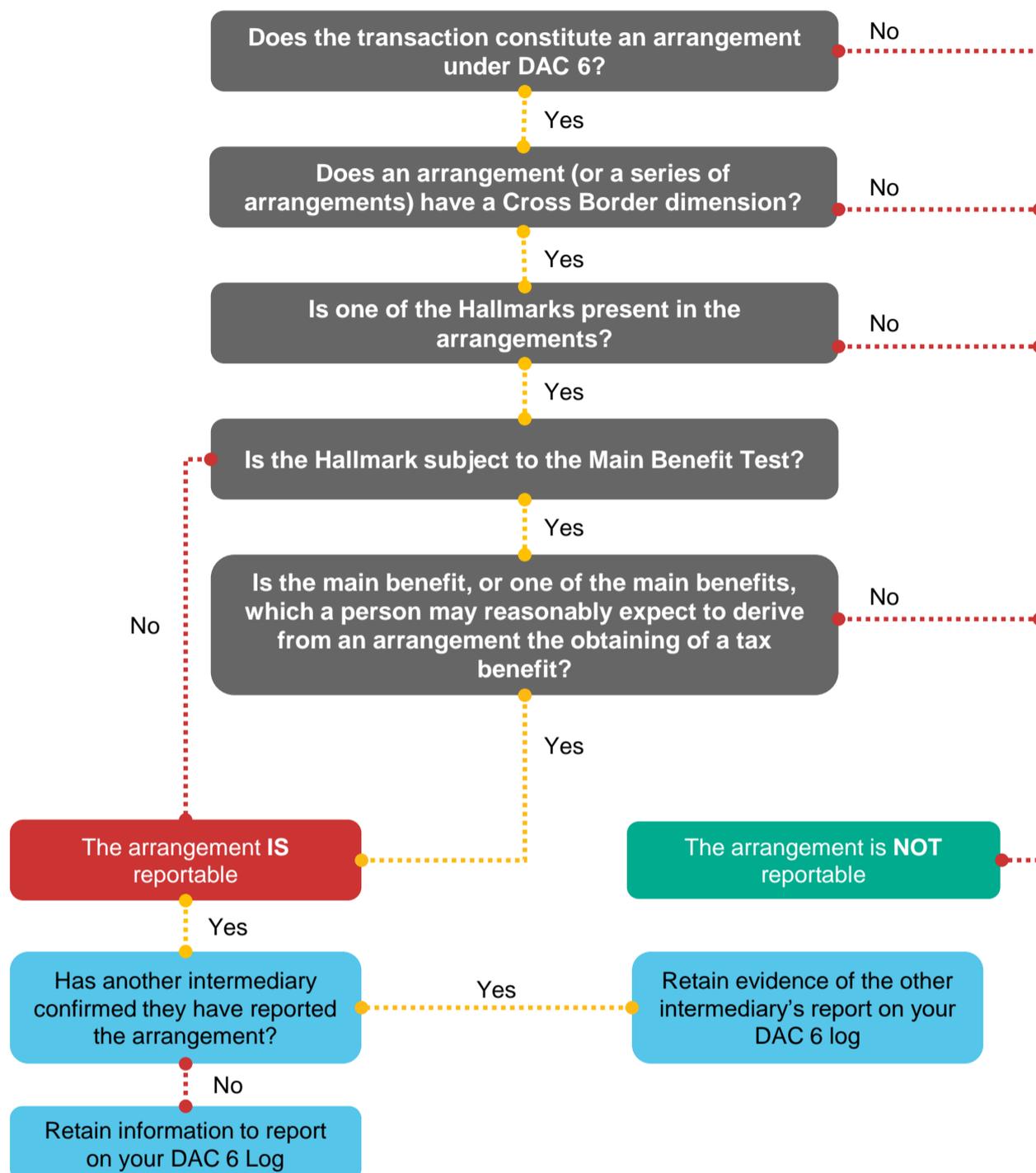


Directive on Administrative Cooperation (DAC 6)



What?

The information to be reported is listed in the Directive.

- Identification of all taxpayers and intermediaries involved, including:
 - tax residence
 - name, date and place of birth (if an individual)
 - tax Identification Number (TIN)
 - where appropriate, the associated persons of the relevant taxpayer.
- Details of the relevant applicable hallmark(s).
- A summary of the arrangement, including (in abstract terms) a summary of relevant business activities.
- The date on which the first step in implementation was or will be made.
- Details of the relevant local law.
- The value of the cross-border reportable arrangement.
- Identification of relevant taxpayers or any other person in any Member State likely to be affected by the arrangement.

When?

The reporting deadlines are as follows.

- Notifications related to the period from 25 June 2018 to 1 July 2020 are required by 28 February 2021.
- Notifications for the period 1 July to 31 December 2020 must be reported within 30 days of 1 January 2021 – i.e. by 30 January 2021.
- Therefore, notifications are required within 30 days of the earlier of:
 - the day on which the arrangement is made available for implementation
 - the day it is ready for implementation
 - the day the first step in implementation is made.

Where?

An intermediary must report wherever it meets any of the following conditions:

- where the intermediary is tax resident
- where the intermediary has a PE connected with the provision of the relevant services
- where the intermediary is incorporated or the territory under whose laws it is governed
- where the intermediary is registered with a tax, consultancy or legal professional association.