

※Should discrepancy due to translation occur, the Chinese version shall prevail.

## **PUBLIC ANNOUNCEMENT**

**Issuance of Notice No. 10724521570 by the Ministry of Finance on December 3, 2018:**

### **Purpose:**

Public announcement of the reference list of Jurisdictions with which the Republic of China (Taiwan) is able to exchange Country-by-Country Reports effectively in accordance with the existing Agreements in force.

### **Background and the content:**

In accordance with Paragraph 7 of Article 22-1 of the Regulations Governing Assessment of Profit-Seeking Enterprise Income Tax on Non-Arm's-Length Transfer Pricing (hereinafter referred to as the Regulations), the Ministry of Finance announces that:

1. The Jurisdictions mentioned in Subparagraph 2, Paragraph 3 of Article 22-1 of the Regulations having Agreements in force with Taiwan and from which tax collection authorities of Taiwan may acquire Country-by-Country (hereinafter referred to as “CbC”) Reports in accordance with such Agreements are: Japan and New Zealand. However, according to the proviso of Paragraph 7 of Article 22-1 of the Regulations, in the case that tax collection authorities of Taiwan eventually are unable to acquire the CbC Reports from this kind of Jurisdictions, the Constituent Entities which are profit-seeking enterprises in Taiwan shall submit CbC Reports within one month after receiving a written notice sent by tax collection authorities of Taiwan.
2. The Jurisdictions mentioned in Subparagraph 3, Paragraph 2 of Article 22-1 of the Regulations having Agreements in force with Taiwan but from which tax collection authorities of Taiwan are unable to acquire CbC Reports in accordance with such Agreements are: Australia, Austria, Belgium, Canada, Denmark, France, Gambia, Germany, Hungary, India, Indonesia, Israel, Italy, Kiribati, Luxembourg, Macedonia, Malaysia, the Netherlands, Paraguay, Poland, Senegal, Singapore, Slovakia, South Africa, Eswatini, Sweden, Switzerland, Thailand, the United Kingdom, and Vietnam.
3. The Notice No. 10724507300 issued by the Ministry of Finance on April 27, 2018 shall cease to apply from this day.