



ΚΥΠΡΙΑΚΗ ΔΗΜΟΚΡΑΤΙΑ
ΥΠΟΥΡΓΕΙΟ ΟΙΚΟΝΟΜΙΚΩΝ



ΤΜΗΜΑ
ΦΟΡΟΛΟΓΙΑΣ
TAX DEPARTMENT
ΚΕΝΤΡΙΚΑ ΓΡΑΦΕΙΑ
1471 ΛΕΥΚΩΣΙΑ

DAC6 –Directive of the Council of EU on mandatory disclosure and exchange of information on cross-border arrangements

1. Extension to the imposition of administrative fines for overdue submission of information
2. Updated sample XML file with added fields for the associated enterprises to the relevant taxpayer

1. The Tax Department informs that there will be no imposition of administrative fines for overdue submission of DAC6 information that will be submitted until the **30th September 2021**, in the following cases:
 - (a) Reportable cross-border arrangements that have been made between 25 June 2018 and 30 June 2020 and had to be submitted by 28 February 2021.
 - (b) Reportable cross-border arrangements that had been made between 1 July 2020 and 31 December 2020 and had to be submitted by 31 January 2021.
 - (c) Reportable cross-border arrangements made between 1 January 2021 and 31 August 2021, that had to be submitted within 30 days from the date they were made available for implementation or were ready for implementation or the first step in the implementation has been made, whichever occurred first.
 - (d) Reportable cross-border arrangements for which secondary intermediaries provided aid, assistance or advice, between 1 January 2021 and 31 August 2021 and had to submit information within 30 days beginning on the day after they provided aid, assistance or advice.
2. In addition, it is noted that, according to Article 7D(13)(a) of the Administrative Cooperation in the Field of Taxation Law L.205(I)/2012, as amended, the information to be submitted for reportable cross-border arrangements, also includes information on persons that are associated enterprises to the relevant taxpayer. Therefore, information should be provided for companies and individuals who are direct shareholders of the relevant taxpayer.

In this regard, the [sample XML file](#) posted on the website of the Tax Department has been updated, with the addition of fields for the associated enterprises of the relevant taxpayer. These fields/tags [`<AssociatedEnterprises>` to `</AssociatedEnterprises>`] and should be filled in as follows:

- Where the direct shareholders of the relevant taxpayer are companies, then the fields/tags `<AssociatedEnterprise>` to `</AssociatedEnterprise>` are filled in with the information of each company. These fields/tags [`<AssociatedEnterprise>` to `</AssociatedEnterprise>`] are copied, in order to fill in the information of each shareholder-company.
- Where the direct shareholders of the relevant taxpayer are physical persons, the fields/tags `<Organization>` to `</Organisation>` are replaced by the fields/tags `<Individual>` up to `</Individual>` as shown in point 4:24 of the video for the use of XML file that is posted on the website of the Tax Department. The fields/tags `<AssociatedEnterprise>` to `</AssociatedEnterprise>` that include the field/tags `<Individual>` to `</Individual>` are copied to fill in the information of each individual-shareholder.
- If the relevant taxpayer does not have shareholders, then the fields/tags `<AssociatedEnterprises>` to `</AssociatedEnterprises>` are deleted.