

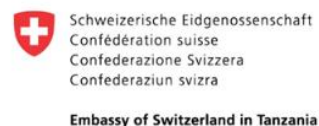


Country by Country Reporting: introduction, structure and analysis of MNE activity for ATI partner countries

In-person workshop, March 4-6, 2025, Radisson Blu, Lusaka, Zambia

Agenda

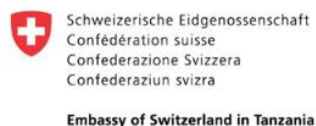
Tuesday, March 4	
9:00 - 9:30	Introduction, welcoming remarks, objectives of the project
9:30 - 10:30	This session equips participants with an understanding of CbCR's scope and structure and its potential in the context of current international tax challenges. We focus on the usefulness of CbCR data in risk assessment for multinational enterprises (MNEs) and how it can complement existing data sources (such as corporate income tax returns). We briefly cover the history and current status of implementation of CbCR around the world. We highlight best practices for utilizing CbCR, including the work ongoing in Slovakia, Czechia, France, Italy, and Germany.
10:30 - 11:00	Coffee / tea break
11:00 - 12:30	This session provides an overview of the aggregate CbCR data available from the OECD database. We present EU Tax Observatory's tool to explore this data, including a live demo. We provide some descriptive statistics from this data, and review the analysis of aggregated CbCR data from 2016-2021 based on the methodology used in State of Tax Justice reports . We explore global MNE activity and profit reporting (and the misalignment of the two). We give an overview of other available evidence on the scale of profit shifting (e.g. Atlas of the Offshore World)
12:30 - 13:30	Lunch break



13:30 - 15:00	In this session we dive into a regional analysis of profit-shifting patterns and the use of offshore centers by companies active in ATI partner countries. We focus on areas and issues of particular importance for the region. We discuss channels that MNEs use to shift profits to low-tax jurisdictions and the relationship between separate accounting and unitary tax. We describe the two-pillar approach by the OECD (i.e. unitary taxation and global minimum tax), and the current development of the negotiations around the UN tax convention.
15:00 - 15:30	Coffee / tea break
15:30 - 17:00	This session focuses on firm-level country by country reporting data. We explain how they are obtained, what we can learn from them and have learned from them so far. We will show Taxplorer , the EU Tax Observatory tool to visualise the data and how tax authorities can exploit this tool. We briefly describe the current plans for the future of publicly available firm-level CbCR data, including via the EU's and Australia's recent transparency measures.
18:30 -	Social dinner (Venue: Prime Joint restaurant)
Wednesday, March 5	
9:00 - 11:00	Practical session, part I. We will set the stage for a practical exercise in using CbCR data. We review the available data sources and discuss their coverage, usefulness, and pros and cons in the context of ATI partner countries. This includes CbCR data in their aggregate form as published by the OECD, and firm-level data from the following sources: (i) available to participating countries via direct data collection (from companies headquartered in the country or via local filing requirements), (ii) available via information exchange, (iii) in specific sectors with stricter requirements (i.e. extractive industries and banks), and (iv) voluntarily published CbCR. We begin work on the voluntarily published CbCR data.
11:00 - 11:30	Coffee / tea break



11:30 - 13:00	Practical session, part II. We calculate the share of various measures of economic activity of each company in every country in which it operates and implement several versions of the formula that combines these measures.
13:00 - 14:00	Lunch break
14:00 -	Social activity
Thursday, March 6	
9:00 - 11:00	Practical session, part III. We derive the estimates of misalignment of economic activity and reported profits by calculating theoretical profits and comparing them to reported profits. We add information on tax haven status and effective tax rates and produce estimates of the relationships between these variables.
11:00 - 11:30	Coffee / tea break
11:30 - 12:30	In this session, we present case studies illustrating the corporate structure and location of high-risk activities based on public firm-level CbCR. We present a new database on extractive projects based on EITI data. We focus on firm- and industry-specific perspectives, such as the oil and mining industry.
12:30 - 13:30	Lunch break
13:30 - 15:00	Practical session, part IV. We analyze the results to identify companies with the highest levels of misalignment. We describe the possible underlying reasons for this misalignment and focus on policy tools that can be used to mitigate those channels, such as withholding taxes or thin capitalization rules. We discuss the limitations of current transfer pricing controls due to the lack of comparables and describe best practices in this area.
15:00 - 15:30	Coffee / tea break





15:30 - 16:30	Concluding discussion, interpretation of results and the exercise as a whole. We focus on the practical use of CbCR data in policymaking, primarily in transfer pricing audit case selection. Planning of next steps.
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The [Addis Tax Initiative \(ATI\)](#) is a multi-stakeholder partnership consisting of partner countries, developing partners and supporting organisations. It fosters collective action to improve tax systems in light of recognised gaps in development finance and aims to promote fair and effective domestic revenue mobilisation (DRM), policy coherence and the social contract through partnerships and knowledge building.

The [International Tax Compact](#) facilitates the Secretariat of the ATI.

The ITC is a provider of secretarial services for results-oriented initiatives in the area of tax and development. It aims to promote fair, efficient, and transparent tax systems for sustainable development. The German Federal Ministry for Economic Cooperation and Development (BMZ) has launched the ITC in 2009 and commissioned the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH to facilitate the ITC. The ITC is currently funded by the German Federal Ministry for Economic Cooperation and Development (BMZ) and co-funded by the European Union.

