The Treasury
Yn Tashtey

Assessor of Income Tax
Nicola Guffogg

INCOME TAX DIVISION
Government Office, Douglas
Isle of Man, British Isles
IM1 3TX

Telephone:	(01624) 685400
Fax:	(01624) 685351
E mail:	incometax@itd.treasury.gov.im
Website:	www.gov.im/incometax

Country-by-Country Reporting (CbCR)
Isle of Man Reporting and Validation

Date: 19 February 2018

This document outlines the method for Isle of Man Reporting Entities with Country-by-Country Reporting (CbCR) obligations to report to the Assessor, including details about Isle of Man specific validation requirements.

CbC reports must be submitted to the Assessor using the Isle of Man Government Information Providers' Online Service in the prescribed XML format published by the OECD.

Reporting Entities are advised that the OECD User Guide and CbC schema v1.0.1 can be found on the OECD's BEPS pages using the link below:-

- XSD File and User Guide (version - September 2017) - http://www.oecd.org/ctp/exchange-of-tax-information/country-by-country-reporting-xml-schema-user-guide-for-tax-administrations.htm

This document includes a number of defined terms which should be read in conjunction with both CbCR guidance on the ITD website and guidance published by the OECD.

1. REGISTRATION

A Reporting Entity must notify the Assessor that it has a requirement to report no later than **6 months** following the last day of the first "reporting fiscal year" of the MNE group.

To notify the Assessor, an Information Providers' registration form must be completed using the following link requesting a CbCR report on the "Your Reports" page:-

- Registration form - https://www.gov.im/categories/tax-vat-and-your-money/income-tax-and-national-insurance/international-agreements/fatca-and-common-reporting-standard/information-providers-reporting-registration-form/

On completion of the registration form, the Assessor will contact the Reporting Entity with additional information about enrolling for the Income Tax Division's Information Providers' Online Service.

2. ONLINE SERVICES

The Assessor will provide the registered Reporting Entity with the necessary Tax Reference Number, Security and Activation codes, which are required to enrol for the Information Providers' Online Service.

The Information Providers' Online Service is accessible at https://services.gov.im/income-tax/ (as illustrated in Fig.1) where the required enrolment information can be provided following a short online registration process.

The Online Service allows a Reporting Entity to attach, validate and then submit a valid XML CbC report to the Assessor. A link on the 'Returns' page allows the attachment of an XML file (as illustrated in Fig.2).

Any validation issues will be notified through the Information Providers' Online Service and once addressed by the Reporting Entity a new XML file can be attached and re-validated. Only one valid XML file can be submitted at any one time.

The Assessor will provide an electronic acknowledgement of receipt, with the Information Providers' Online Service also providing a history of submitted CbC reports.

Fig.1
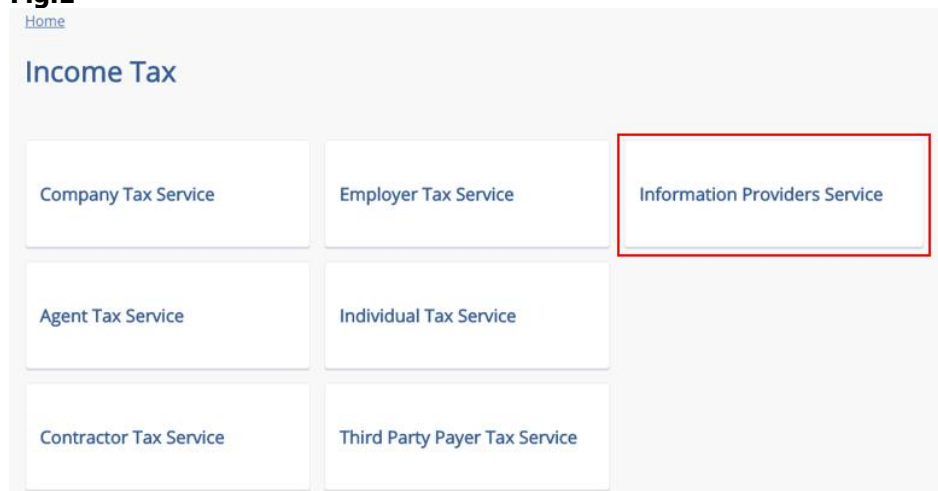
Fig.2

3. SCHEMA AND ADDITIONAL VALIDATION

The OECD CbC schema v1.0.1 includes certain validations that must be passed before a CbC report can be submitted.

In addition to schema level validation, CbC Reportable Jurisdictions will validate the data received at record level to ensure that files contain all of the necessary information required to be reported. The Assessor has therefore enhanced the validation on the Information Providers' Online Service to ensure that XML files received comply with these requirements as well as normal schema validation.

The additional validation is detailed below:-

- **MessageSpec**
  'SendingEntityIN' – This field must be included and contain the Reporting Entity's reference number obtained when registering for the Information Providers' Online Service eg. – **C000000Q01**

When submitting the data to the Assessor, Reporting Entities should ensure that the 'TransmittingCountry' and 'ReceivingCountry' elements are both set to 'IM' (as illustrated in Fig.3).

```
Fig.3
<cbc:MessageSpec>
    <cbc:SendingEntityIN>C000000Q01</cbc:SendingEntityIN>
    <cbc:TransmittingCountry>IM</cbc:TransmittingCountry>
    <cbc:ReceivingCountry>IM</cbc:ReceivingCountry>
    <cbc:MessageType>CBC</cbc:MessageType>
    <cbc:MessageRefId>IM2017-abc123def456</cbc:MessageRefId>
    <cbc:MessageTypeIndic>CBC401</cbc:MessageTypeIndic>
    <cbc:ReportingPeriod>2017-03-31</cbc:ReportingPeriod>
    <cbc:Timestamp>2018-01-15T09:15:00</cbc:Timestamp>
</cbc:MessageSpec>
```

The 'MessageTypeIndic' has been made mandatory for Isle of Man reporting and should be set to either CBC401 (new information) or CBC402 (message contains corrections for previously sent information) as outlined in the OECD guidance.

'CorrMessageRefId' - This data element is not used for CbC reporting and should <u>not</u> be provided.

- **DocSpec**

    The elements found in the 'DocSpec' feature throughout various sections of the CbC report.

    Each 'DocRefId' used must be completely unique in space and time, so to ensure that this is the case, Isle of Man Reporting Entities must follow the prescribed format.

    The Assessor will accept 'DocRefId' that start with the Information Providers' Tax Reference Number for the Isle of Man Reporting Entity followed by a full stop and a unique number/character combination eg. **C000000Q01.123abc456def789** (as illustrated in Fig.4).

    As per the OECD's CbC XML User Guide, the identifier should start with the sending country code followed by the year to which the data relates.

    The country codes and year will be inserted by the Assessor prior to transmission (as illustrated in Fig.5).

```
Fig.4
<cbc:DocSpec>
    <stf:DocTypeIndic>OECD1</stf:DocTypeIndic>
    <stf:DocRefId>C000000Q01.123abc456def789</stf:DocRefId>
```

```
Fig.5
<cbc:DocSpec>
    <stf:DocTypeIndic>OECD1</stf:DocTypeIndic>
    <stf:DocRefId>IM2017.C000000Q01.123abc456def789</stf:DocRefId>
```

'CorrMessageRefId' - This data element is not used for CbC reporting and should <u>not</u> be provided.

The 'DocTypeIndic' element is used to specify whether a submission is new or whether it is changing a previously submitted report and can also be used to distinguish a test file from a live file.

Reporting Entities should not submit test files through the Information Providers' Online Service. Therefore, the DocTypeIndic must be set to **OECD1** (new), **OECD2** (corrected), **OECD3** (void/deletion) or **OECD0** (re-send) only.

- **CbcBody**

A maximum of one 'CbcBody' can be provided within each submitted XML file.

- **ReportingEntity**

'TIN' / 'IN' - The 'TIN' element is mandatory and should be provided on all occasions. The 'IN' is optional and a Reporting Entity may choose to omit.

If either the 'TIN' or 'IN' are unknown, the Reporting Entity should still provide the element as "NOTIN" as outlined in the OECD User Guide. In all instances an 'issuedBy' attribute should be included (as illustrated in Fig.6).

```
Fig.6
<cbc:Entity>
    <cbc:ResCountryCode>IM</cbc:ResCountryCode>
    <cbc:TIN issuedBy="IM">C000000</cbc:TIN>
    <cbc:Name>Local PLC</cbc:Name>
```

- **CbCReports**

The attribute 'currCode' is used to identify the currency code used for various financial information contained in the 'Summary' section. The currCode within any one Summary section should all match.

'TIN' / 'IN' - The 'TIN' element is mandatory and should be provided on all occasions. The 'IN' is optional and a Reporting Entity may choose to omit.

If either the 'TIN' or 'IN' are unknown, the Reporting Entity should still provide the element as "NOTIN" as outlined in the OECD User Guide. In all instances an 'issuedBy' attribute should be included (as illustrated in Fig.7).

```
Fig.7
<cbc:ConstEntity>
<cbc:ResCountryCode>GG</cbc:ResCountryCode>
<cbc:TIN issuedBy="GG">NOTIN</cbc:TIN>
<cbc:IN issuedBy="GG">123456789</cbc:IN>
```

4. IT – GENERAL UPDATES

Test Files

Reporting Entities wishing to test XML files will be able to do so by uploading files to the open Information Providers' return, but are reminded that when using the service to test they **must** delete successful test files and **must not** press the submit button at any time other than when the actual report is ready to be sent.

Please also note, if the XML file contains the appropriate 'DocTypeIndic' for a test file (ie. **OECD11**) the Information Providers' Online Service will return an error in this respect.

Inhibited Characters

The Assessor wishes to advise Reporting Entities that the Information Providers' Online Service accepts XML reports with apostrophes in **all** instances. However, due to complex rules that exist within the transmission and validation systems over the acceptance of certain character/letter combinations, the Assessor will be **removing** all apostrophes from Isle of Man reports, and replacing them with a space, prior to exchanging the information using the OECD's Common Transmission System (CTS).

Namespace

All Isle of Man Reporting Entities are encouraged to use the OECD's CbC namespaces throughout their XML submissions.

Namespace	Description	Filename
cbc	CbC types	CbcXML_v1.0.1.xsd
stf	OECD Common types	oecdtypes_v4.1.xsd
iso	ISO types (Country & Currency codes)	isocbctypes_v1.0.1.xsd

Nicola Guffogg

Assessor of Income Tax