



EDFIS/C/020/2021
21st March 2021

Chief Executive Officers
All CBB Licensees
Manama
Kingdom of Bahrain

Dear Sir / Madam,

Re: Exchange of Information for Tax Purposes (“EOI”) - Country-by-Country Reporting (“CbCR”)

Further to the Central Bank of Bahrain (“CBB”) Directives in relation to the Exchange of Information (“EOI”) for tax purposes and the Cabinet Resolution on its session on 7th May 2018, in which the Cabinet approved that Kingdom of Bahrain joins the Inclusive Framework on Base Erosion and Profit Shifting (“IF-BEPS”) and implements its actions and standards.

The Ministry of Industry, Commerce and Tourism (“MOICT”) has issued Ministerial Order No. (28) of 2021 dated 3rd February 2021 with respect to the Country-by-Country Reporting (“CbCR”), a copy of which is attached.

As per the aforementioned Ministerial Order, Article (1) defines the relevant terms in relation to the CbCR. More specifically, terms such as Multinational Enterprise (“MNE”) Group, Excluded MNE Group, Constituent Entity, Ultimate Parent Entity and Reporting Entity.

The CBB wishes to inform all licensees who qualify as reporting entities, as per the above Ministerial Order, that they must comply with its provisions as of the fiscal year starting 1st January 2021.

Therefore, each Ultimate Parent Entity that is resident in the Kingdom of Bahrain is required to file CbC report to MOICT conforming to the requirements of Article 5 of the above Ministerial Order for the reported fiscal year no later than twelve months from the last day of the reported fiscal year for the MNE Group.

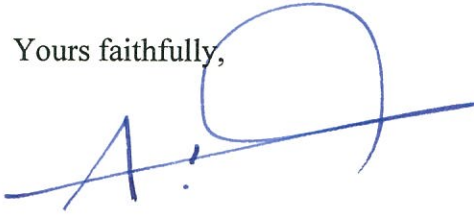
In addition, as per Article (3) of the Ministerial Order, each Constituent Entity of an MNE Group that is resident for tax purposes in the Kingdom of Bahrain should notify the Ministry whether it

is the Ultimate Parent Entity, no later than the last day of the Reporting Fiscal Year of such MNE Group. Where a Constituent Entity of an MNE Group that is resident for tax purposes in the Kingdom of Bahrain is not the Ultimate Parent Entity, it shall notify the Ministry of the identity and tax residence of the Reporting Entity, no later than the last day of the Reporting Fiscal Year of such MNE Group.

The form and method for submitting the CbC report and the required notifications shall be determined by MOICT.

Should you have any queries in respect of any matter referred to herein, please do not hesitate to contact Dr. Ahmed Bumtaia Director – Compliance Directorate at abumtaia@cbb.gov.bh, Tel: 17 54 7107.

Yours faithfully,



Abdul Rahman Al Baker