

Country-by-Country Report and Notification to Albanian Tax Authorities

# Tax Alert

## Country-by-Country Report: Notification to Albanian Tax Authorities

After the introduction of specific provisions in the law no. 9920/2008 *“On Tax Procedures”* regarding the Country-by-country report (effective as of 1 January 2024), the Council of Ministers approved Decision no. 513/2024 *“On the definition of procedures and detailed information to be included in the Country-by-Country report from multinational enterprise groups”* (the **“Decision”**).

The Decision outlines the procedures, and the detailed information to be included in the Country-by-Country (CbC) report of multinational enterprise groups (MNE groups).

### **Notification requirement (within the last day of the Reporting Fiscal Year of the MNE group)**

For purposes of the CbC report, the term *‘Fiscal Year’* means an annual accounting period with respect to which the ultimate parent entity of the MNE group prepares its financial statements; while the term *‘Reporting Fiscal Year’* means that Fiscal Year the financial and operational results of which are reflected in the relevant CbC report.

The Decision requires that any constituent entity (part of a MNE group) that is resident for fiscal purposes in Albania to notify the tax authorities not later than the last day of the Reporting Fiscal Year of such MNE group:

- if it is the ultimate parent entity of the group; or
- when the constituent entity is not the ultimate parent entity, the identification data and the tax residence of the reporting entity.

For example, if the fiscal year of a MNE group ends on 31 December 2024, the notification should be

submitted to the Albanian tax authorities no later than that date.

A new notification form is submitted in the event of a change in the information previously provided. If there are no changes in circumstances or information since the initial submission of the notification to the tax administration, a constituent entity of an MNE group is not required to submit the notification form for subsequent periods.

In cases where multiple constituent entities of the same MNE group are tax resident in Albania, the MNE group may designate one of these entities to file a single notification, which includes all constituent entities tax resident in Albania. In such cases, the notification shall comprehensively list all constituent entities resident in Albania.

The notification form to be submitted with the tax authorities is herein below.

### **CbC report**

An ultimate parent entity of an MNE Group that is resident in Albania for tax purposes shall prepare and submit to the Albanian tax authorities the CbC report. MNE groups with a consolidated group revenue of less than 105 billion Leke during the fiscal year preceding the reporting fiscal year as reported in its consolidated Financial Statement are not required to prepare and submit a CbC report.

The CbC report shall be filed within 12 months from the closing of the Reporting Fiscal Year of such MNE group. Late filing is subject to penalties.

**Form of notification**

**OBLIGATION FOR NOTIFICATION IN RELATION WITH COUNTRY-BY-COUNTRY REPORT**

Name of the group:

Name of the Albanian entity that gives this notification:

Entity tax identification number:

End date of the accounting period:

**Notification in conformity with letter "a", of article 63/3, of the law no. 9920, dated 19.5.2008, "On tax procedures in the republic of Albania", as amended:**

this notification is being submitted on behalf of: (Insert YES or NO inside the boxes, as applicable)

- Ultimate parent entity? ☐
- Constituent entity? ☐

**Notification in conformity with letter "b", of article 63/3, of the law no. 9920, dated 19.5.2008, "On tax procedures in the republic of Albania", as amended (when the Albanian entity is not the ultimate parent entity):**

Name of the reporting entity:

Jurisdiction where is submitted:

Reporting entity tax identification number:

Full address of the reporting entity:

End date of the accounting period of reporting entity:

List of all Albanian constituent entities:

Name:

Name:

Tax identification number:

Address:

**Follow us:**

LinkedIn: <https://www.linkedin.com/company/boga-&-associates>

Facebook: <https://www.facebook.com/BogaAssociates>

If you wish to know more on issues highlighted in this edition, you may approach your usual contact at our firm or the following:

[info@bogalaw.com](mailto:info@bogalaw.com)

**Tirana Office**

40/3 Ibrahim Rugova Str.

1019 Tirana

Albania

Tel +355 4 225 1050

Fax +355 4 225 1055

[www.bogalaw.com](http://www.bogalaw.com)

[www.bogalawip.com](http://www.bogalawip.com)

**Pristina Office**

50/3 Sylejman Vokshi Str.

10000 Pristina

Kosovo

Tel +383 38 223 152

Fax +383 38 223 153

[www.bogalaw.com](http://www.bogalaw.com)

---

**BOGA & ASSOCIATES**  
**AWARDS AND RECOGNITION 2023-2024**

---

**Chambers Global 2024:** Ranked **Band 1** in Corporate/Commercial

**Chambers Europe 2024:** Ranked **Band 1** in 3 practice areas

**The Legal 500 2024:** Ranked **Tier 1**

**ITR Tax Review 2024** – Top Ranked

**IFLR1000 2024:** Ranked **Tier 1** in Financial and Corporate

**Benchmark Litigation Europe 2022:** Top Ranked in Dispute Resolution

**WTR1000 2024:** Top Ranked in Trademarks

The Tax Alert is an electronic publication edited and provided by Boga & Associates to its clients and business partners. The information contained in this publication is of a general nature and is not intended to address the circumstances of any particular individual or entity. The Tax Alert is not intended to be and should not be construed as providing legal and tax advice. Therefore, no one should act on such information without appropriate professional advice after a thorough examination of the particular situation. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. You can also consult the Tax Alert on the section “Library” of our website.

© 2024 Boga & Associates. All rights reserved.

This publication is copyrighted and is protected to the full extent of the law. Nevertheless, you are free to copy and redistribute it on the condition that full attribution is made to Boga & Associates. If you have not received this publication directly from us, you may obtain a copy of any past or future related publications from our marketing department ([marketing@bogalaw.com](mailto:marketing@bogalaw.com)) or consult them in our website ([www.bogalaw.com](http://www.bogalaw.com)). To unsubscribe from future publications of Tax Alert, please send “Unsubscribe” by replying to our email accompanying this edition.

## Boga & Associates

**Boga & Associates**, established in 1993, has emerged as one of the premier law firms in **Albania** and **Kosovo**, earning a reputation for providing the highest quality of legal, tax and accounting services to its clients. From the year 1999 until May 2007, the firm was a member firm of KPMG International and the Senior Partner/Managing Partner, Mr. Genc Boga, was also the Senior Partner/Managing Partner of KPMG Albania.

The firm’s particularity is linked to the multidisciplinary services it provides to its clients, through an uncompromising commitment to excellence. Apart from the widely consolidated legal practice, the firm offers the highest standards of expertise in tax and accounting services, with keen sensitivity to the rapid changes in the Albanian and Kosovo business environment. The firm delivers services to leading clients in major industries, banks and financial institutions, as well as to companies engaged in insurance, construction, energy and utilities, entertainment and media, mining, oil and gas, professional services, real estate, technology, telecommunications, tourism, transport, infrastructure and consumer goods.