Grant Thornton

TAX ALERT

Public CbCR in Luxembourg

First reports due by **31 December 2026**

EUR 750m	31 Dec 2026	12 months	EUR 25,000
group revenue, two years in a row	first deadline, calendar-year groups	after year end to publish	maximum fine for directors

Multinational groups with consolidated revenue above EUR 750 million and a presence in Luxembourg may be required to publish a report on income tax information ("Public CbCR"). For groups with a calendar financial year, **the first report covers FY 2025 and must be published by 31 December 2026.**

Why Public CbCR?

The EU aims to increase corporate tax transparency by making public where large multinational groups generate their profits and where they pay their taxes. Unlike the confidential OECD country-by-country report filed with the tax authorities, this report is made available to anyone: investors, media, NGOs and the general public.

Legal basis – Public CbCR derives from Directive (EU) 2021/2101, amending the Accounting Directive (Directive 2013/34/EU). Luxembourg transposed it by the law of 15 August 2023, notably amending the law of 19 December 2002 on the Trade and Companies Register and on the accounting and annual accounts of undertakings.

Financial year	First reporting year	Publication deadline
Calendar year	FY 2025 (1 January – 31 December 2025)	31 December 2026
Other	First financial year starting on or after 22 June 2024	12 months after the balance sheet date

01 Who is in scope

Groups whose consolidated revenue exceeded **EUR 750 million in each of the last two consecutive financial years.** Who files in Luxembourg depends on where the ultimate parent is established:

Luxembourg presence	Reporting entity	Conditions
Ultimate parent or standalone undertaking	The Luxembourg undertaking, for the whole group	Not applicable if the group operates only in Luxembourg
Subsidiary of a group with an EU ultimate parent	No Luxembourg obligation	The ultimate parent reports in its own Member State
Medium-sized or large subsidiary of a non-EU group	The Luxembourg subsidiary	Exceeds two of three criteria for two consecutive years: balance sheet EUR 7.5m, net turnover EUR 15m, 50 employees
Branch of a non-EU undertaking	The Luxembourg branch	Net turnover above EUR 8.8m for two consecutive years, and no medium-sized or large Luxembourg subsidiary in the group

Non-EU groups: one filing for the whole EU – Luxembourg subsidiaries and branches are released from the filing or reporting obligation where the non-EU parent publishes a compliant report on its website within 12 months, and the report names a single EU subsidiary or branch that has filed it in its Member State.

02 What the report contains

Activities Nature of the business	**Employees** Full-time equivalent	**Revenues** Incl. related parties	**Profit before tax** Profit or loss
Income tax accrued Current year	**Income tax paid** Cash basis	**Accumulated earnings** At year end	**By jurisdiction** EU and EU-blacklisted countries; others aggregated

Existing OECD CbCR data can be used as a basis. Commercially sensitive items may be deferred for up to five years.

Publication

Filed with the RCS within 12 months of the balance sheet date and notified in the RESA.

No separate website publication is required where the report is available on the RCS website, but the company's website must then indicate the use of this publication method and include a reference to the RCS website.

The report must remain accessible for at least five years.

Sanctions and audit

Directors may be held collectively responsible, with fines of **EUR 500 to EUR 25,000.**

The statutory auditor must state whether the prior-year report was required and published: **a missing FY 2025 report will appear in the FY 2026 audit report.**

03 How Grant Thornton can help

From scoping to filing in Luxembourg

We assist with scoping, coordination with your parent and other Grant Thornton member firms, and preparation or review of the report. We can also file it with the RCS on your behalf, including for non-EU groups that choose Luxembourg for their single EU filing.

For additional information, you may contact:



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