

# Australian Public CbCR

## Increased transparency measures for multinationals with an Australian presence

### What is Australian Public CbC Reporting?

The Australian Public CbC Reporting (AU pCbCR) laws increase tax transparency for multinational enterprises with a presence in Australia. Multinationals will be required to publish a significant amount of data previously lodged confidentially with the tax authority. The rules apply to years beginning on or after 1 July 2024. More detailed guidance can be found in our [Tax Alert](#).

### Reporting requirements

Broadly based on the [GRI 207 Tax standard](#), AU pCbCR requires the following to be submitted to the Australian Taxation Office (ATO) for publication:

- Group entity names
- Description of the Group's approach to tax
- Country-by-Country (CbC) tax, financial and headcount data. Data can be aggregated for certain jurisdictions.

### Who does it apply to?

- Groups with an Australian presence (one or more Australian resident entities or permanent establishment/s)
- Global consolidated income of AUD 1 billion or more in the prior year, and AUD 10 million or more of Australian sourced income in the current year
- Applies to 'constitutional corporations', partnerships and trusts (in which all partners / trustees are constitutional corporations)

### Key Takeaways

- Due 12 months after year end (eg a pCbCR for 31 December 2025 will need to be filed by 31 December 2026).
- Must be based on (or be able to be reconciled to) audited consolidated financial statements (if prepared). This is stricter than OECD CbC Reporting.
- Overlaps with requirements of GRI 207, OECD CbCR and EU public CbC directive may allow some leverage from existing reporting packages, but some adjustments are likely to be needed
- Some definitions are complex and may require careful consideration
- Limited scope for exemptions ([draft guidance](#) available, expected to be finalised late 2025)
- Significant penalties for non-compliance (up to AUD 825,000, subject to periodic increases)
- [Registration](#) encouraged; allows nomination of local subsidiary contact and tax agent.
- **Groups in scope should assess their position against this set of measures and evaluate the most effective compliance and communication strategy**



### How can we help?

Our tax and technology specialists can support all phases of your tax transparency and governance journey. We recommend assessing whether AU pCbCR applies to you, and if so, preparing for the new reporting obligations. This may include:



#### Assess applicability of AU pCbCR rules

- Review group structure and financial information to determine applicability of AU pCbCR
- Create a framework for annual AU pCbCR applicability assessment
- Assess eligibility for exemptions



#### Group approach to tax

- Co-develop and/or document your Group tax strategy, including supporting governance
- Assist with disclosures of Group's approach to tax for AU pCbCR purposes



#### CbC tax data reporting

- Guidance and templates for sourcing and reporting AU pCbCR data
- Readiness assessment for AU pCbCR based on existing reports
- Visualise your data to consider how they may be interpreted by the general public
- Develop bespoke tax technology/reporting solutions to automate AU pCbCR preparation
- Consider alignment and reconciliation of similar data used for other purposes (e.g. Pillar Two)
- Registrations and filings



#### Stakeholder engagement strategy

- Identify relevant internal and external stakeholders
- Develop/document stakeholder communication strategy
- Assist you to implement communication strategy in AU pCbCR disclosures



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