Hungarian Government Authorizes Signing of CbCR IGA with United States

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On 3 November 2023, the Hungarian government approved the text of the new Country-by-Country Reporting Intergovernmental Agreement (IGA) with the United States, by way of Government Decree 1482/2023 (XI. 2.), as published in the Official Journal on the same date. The decree authorizes the finance minister as responsible for the finalization of the agreement, signature and initiating the ratification procedure before the parliament.

A new agreement is necessary as the previous CbCR IGA (2018) ceased to be in effect on 8 January 2023, the date when the termination of the tax treaty (1979) between Hungary and the US took effect (see United States Terminates Tax Treaty with Hungary (18 July 2022)).

The agreement will replace the ceased IGA. A joint statement was signed in December 2022 between the authorities of the two states to temporarily allow for spontaneous exchange of CbC reports under the multilateral Convention on Mutual Administrative Assistance in Tax Matters. For previous reporting, see Hungary and United States Sign Joint Statement on Spontaneous Exchange of Country-By-Country Reports for Fiscal Years Beginning in 2021 (27 December 2022).

Further developments will be reported as they occur.

The Government Decree (in Hungarian) is available here.

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