## Hungary; United States

## Hungary and United States Sign Joint Statement on Spontaneous Exchange of Country-by-Country Reports for Fiscal Years Beginning in 2022

28 December 2023

Report from IBFD Tax Treaties Unit

According to an update of 22 December 2023, published by the US Internal Revenue Service (IRS), Hungary and the United States have signed the Hungary – United States Joint Statement on the Implementation of the Spontaneous Exchange of Country-by-Country (CbC) Reports for Fiscal Years Beginning in 2022. The joint statement temporarily allows for the exchange of CbC reports while negotiations are taking place for a new intergovernmental agreement (IGA) and a competent authority arrangement (CAA) to allow for the automatic exchange of CbC reports under the multilateral Convention on Mutual Administrative Assistance in Tax Matters, as amended by the 2010 protocol. Further developments will be reported as they occur.

Note: The Hungary – United States Agreement on the Exchange of Country-By-Country (CbC) Reports (2018) and the Competent Authority Arrangement to the 2018 Agreement (2018) were terminated from 8 January 2023, the same date the termination of the Hungary - United States Income Tax Treaty (1979) took effect.

Hungary; United States - Hungary and United States Sign Joint Statement on Spontaneous Exchange of Country-by-Country Reports for Fiscal Years Beginning in 2022 (28 Dec. 2023), News IBFD.

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