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Comply, Refuse, or Defer: First Evidence on EU Public Country-by-Country Reporting

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Executive Summary

The European Union's Public Country-by-Country Reporting (CbCR) Directive aims to make where multinationals operate and where they pay tax visible to investors, regulators, and the public. To that end, it requires large multinationals to publish jurisdiction-level data on revenues, profits, taxes, and employees. This report asks whether the Directive delivers on that objective. We examine three questions: does the regime add new public information, how complete is the disclosure, and how much of multinational activity does its geographical design make visible? Romania was the first Member State to transpose the Directive, with rules applying from financial year 2023. The Romanian filings are therefore the first mandatory disclosures under a framework that will soon apply across all 27 Member States, and provide the first empirical evidence on how multinationals respond to the Directive.

We construct the first comprehensive dataset of public CbCR filings: 144 multinationals from 24 headquarters countries, covering financial years 2023 and 2024, for a total of 164 reports. No centralised repository exists, and the data requires multilingual searches across company websites, followed by information extraction from heterogeneous PDFs. Each report was read in full and classified by geographical scope, variable completeness, and the reasons firms provide for incomplete disclosure.

Three findings emerge. First, on coverage and additionality: the Directive does add new public information, since the majority of multinationals now publishing have no prior voluntary disclosure history. But coverage falls short of the Directive's theoretical scope: 20% of the 569 non-EU multinationals estimated to be in scope have published a report. Second, on disclosure quality: 38% of reports are incomplete, most commonly limited to Romania only (Apple, Nestlé, and Procter & Gamble among them). The main causes are parent non-cooperation and safeguard clause invocations. Third, on geographical reach: the Directive's design leaves a large share of multinational activity outside country-level disclosure. Separate reporting is required for EU Member States and jurisdictions on the EU non-cooperative list. Activity in other jurisdictions may be aggregated into a residual "Others" category that absorbs 71% of profits and 74% of revenues in the Romanian data. Because the early reporters are predominantly non-EU-headquartered, this residual is largely a proxy for parent-jurisdiction activity. The non-cooperative list, the Directive's strongest transparency guarantee, has narrow coverage and qualitative compliance criteria that only partially match the geography of contemporary profit shifting.

Some of these gaps are transitional, while others are structural and require legislative reform. The Commission's review should prioritise three changes. First, widen disclosure on two axes. Geographically, mandate separate reporting for more jurisdictions, in particular the ultimate parent's home country. In terms of variables, add items such as tangible assets and the split between related- and unrelated-party revenues. Second, address parent non-cooperation, which currently reduces many subsidiary reports to Romania-only disclosure. Third, establish a centralised repository for filings.

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REPORT IN A NUTSHELL

Romania's transposition

- Romania was the **first EU Member State to transpose the Directive**, in September 2022, with rules applying from financial year 2023. Implementation matches other Member States across most dimensions, but Romania extends separate reporting to all EEA jurisdictions and **lacks dedicated penalties for non-compliance**.

Reporting population

- **Only 20%** of the 569 non-EU multinationals estimated to fall within scope have published a report.
- The Directive nonetheless **reaches firms that were not disclosing voluntarily**: 128 of 160 multinationals reporting in 2023 have no prior CbCR history.

Quality and accessibility of disclosure

- **No centralised repository exists.** Filings are scattered across company websites and national filing systems in heterogeneous formats and languages.
- **63 of 164 reports (38%) have incomplete disclosures**, most commonly **limited to Romania only**. These include multinationals such as **Apple and Nestlé**, whose reports are limited to their Romanian subsidiaries. The main drivers are **parent non-cooperation** and **safeguard clause invocations** citing competitive disadvantage or commercial sensitivity.

The transparency boundary in the Directive's design

- For non-EU-headquartered multinationals, jurisdictions outside the EU and the non-cooperative list may be reported on a single aggregate line, including the parent's home country. Due to this inclusion, this residual absorbs 71% of profits and 74% of revenues.
- The **non-cooperative list is a strong legal instrument but has narrow coverage**: its qualitative compliance criteria do not seem to match the geography of profit shifting.

Priorities for the Commission's upcoming review

- **Expand the scope of disclosure**, both geographically (separate reporting for more jurisdictions, in particular the parent's home country) and in terms of variables (tangible assets, the split between related- and unrelated-party revenues).
- **Address parent non-cooperation.** The Directive cannot compel a non-EU parent to share group data, which reduces many reports to a single country.
- **Establish a centralised, EU-level repository** for filings.

Contents

1 Introduction **5**

2 The EU Public CbCR Directive and Romania's transposition **6**

2.1 Romania's transposition: early timing, broad scope, limited sanctions 8

3 Early disclosures: data, quality, and constraints **10**

3.1 The public CbCR reporting template 10

3.2 Accessibility and data construction 12

3.3 Coverage and additionality 15

3.4 Reporting quality 17

4 The transparency boundary **22**

4.1 The "Others" category: where most economic activity is aggregated 22

4.2 The non-cooperative jurisdiction list as a transparency tool 24

5 Discussion and policy implications **28**

Appendices **32**

A Other public disclosures **32**

B EU list of non-cooperative jurisdictions **35**

C Scoring framework for EU Public CbCR implementation **38**

D Booking Holdings: Additional report sections **39**

E Taxplorer **41**

F Fair Tax Foundation sample comparison **42**

G Subsidiary size thresholds and OECD comparison **43**

H Safeguard clause and omitted information: illustrative examples **47**

I CbCR Example: Apple **49**

1 Introduction

Corporate tax transparency requirements have multiplied over the past decade. Across jurisdictions, policymakers have introduced new disclosure requirements with the aim of improving public accountability, strengthening enforcement capacity, and enabling more informed debate about the taxation of multinational enterprises. The European Union and Australia have adopted their own public country-by-country reporting (CbCR) regimes (Australian Taxation Office, 2025), and the United States has expanded mandatory tax disclosures in financial statements (Financial Accounting Standards Board, 2023).[1] While the institutional forms of these reforms differ, the common direction is clear: tax outcomes that were historically observable only by tax authorities are increasingly made visible to investors, regulators, and the public.

The European Union has led this shift. It first required public CbCR for banks and large investment firms,[2] and then extended public CbCR to all large multinationals through Directive 2021/2101 (the Public CbCR Directive), adopted in 2021 after several years of negotiation. The obligation applies to groups with consolidated revenues above EUR 750 million in each of the last two consecutive financial years and requires publication of a standardised report covering the nature of activities, employees, revenues, profit or loss before tax, income tax accrued, income tax paid, and accumulated earnings, broken down by jurisdiction.[3]

This report asks whether the EU Directive delivers on the transparency objective. Romania was the first EU Member State to enforce the rules, transposing them into domestic accounting regulations in 2022, before most other member states did so.[4] The reports filed in Romania are the first mandatory disclosures under a framework that will soon apply across all 27 Member States. We use this early data to answer three questions. Does the Directive generate new public information, and how complete is the coverage? What do the first filings reveal about disclosure quality? And how much of multinational activity does the Directive's geographical design actually make visible?

We construct the first comprehensive dataset of public CbCR filings under the EU Directive: 144 multinationals from 24 headquarters countries, spanning financial years 2023 and 2024, for a total of 164 reports. No centralised repository exists, and the data requires systematic multilingual searches across company websites and national filing systems, followed by manual extraction from heterogeneous PDF formats. Each of the 164 reports is read in full, classified by geographical scope, variable completeness, and the reasons firms provide for incomplete disclosure. We benchmark the Romanian filing population against OECD aggregate CbCR statistics to estimate the coverage gap and assess additionality.

Three findings stand out. First, the regime's effective coverage falls well short of its theoretical scope: only 20% of non-EU multinationals estimated to be in scope have filed a report. Yet the Directive generates new transparency: the majority of multinationals now publishing were not doing so voluntarily

[1] Appendix A compares the required variables across these frameworks.

[2] Directive 2013/36/EU (Capital Requirements Directive IV), Article 89.

[3] Commission Implementing Regulation (EU) 2024/2952 establishes the common template and the XHTML/iXBRL electronic reporting format. For legal analysis of the Directive's design, see Traut (2024) and Loureiro (2022).

[4] Romanian Ministry of Finance Orders No. 2048/2022 and No. 1730/2023.

before.

Second, the quality of disclosure varies widely. 38% of reports have incomplete disclosures, driven by parent non-cooperation (35 subsidiaries report that the ultimate parent did not provide group-wide data) and safeguard clause invocations (21 reports, citing competitive disadvantage or commercial sensitivity). The broader mandatory disclosure literature documents similar early-stage heterogeneity in CbCR specifically: under CRD IV, public CbCR by EU banks varied widely across institutions in publication channel, content, and entity coverage (Dutt et al., 2021).

Third, the Directive's geographical design creates a transparency boundary that leaves most economic activity aggregated. The rules require separate reporting for EU Member States and jurisdictions on the EU non-cooperative list; everything else is aggregated into a residual "Others" category that accounts for 71% of profits and 74% of revenues in the Romanian data. Because the early reporters are predominantly non-EU-headquartered, "Others" is largely a proxy for parent-jurisdiction activity. Gundert et al. (2024) predicted this pattern from the Directive's text and firm-level data.

Beyond the residual, even where separate disclosure is required, low-tax jurisdictions are captured unevenly. The non-cooperative list, the Directive's main mechanism for extending transparency beyond the EU, has its own limits: low-tax non-EU jurisdictions such as Bermuda and Singapore are not on the list, while the British Virgin Islands is.

The patterns documented here fall into three groups. Some are embedded in the Directive's text and require legislative reform. Others reflect Romania's national choices and can be addressed through stronger enforcement. The remainder are transitional effects of early adoption that will attenuate as the regime matures. On this basis, the report recommends three priorities for the Commission's Article 48h review: expanding what is disclosed toward full country-by-country breakdowns, addressing parent non-cooperation through stronger rules on group data sharing, and establishing a centralised EU repository for filings.

The report proceeds as follows. Section 2 sets out the institutional framework. Section 3 describes the data, assesses coverage and additionality, and documents reporting quality and disclosure constraints. Section 4 examines the transparency boundary. Section 5 discusses the implications and offers policy recommendations.

2 The EU Public CbCR Directive and Romania's transposition

In the EU legal system, a directive sets a binding objective for all Member States but leaves each country to decide how to achieve it in national law. Each must transpose the directive by a set deadline, choosing the legal instruments and administrative arrangements that best fit its system. Because directives often contain options and open formulations, countries can implement the same obligation in different ways.

The Public CbCR Directive follows this pattern.[5] It defines a minimum standard: multinational groups with consolidated revenues above EUR 750 million must publish a report disclosing six financial and employment variables, with separate rows for each EU Member State and each jurisdiction on the

[5] Directive (EU) 2021/2101, amending Directive 2013/34/EU.

FIGURE 1

Timeline of EU Public CbCR Directive transposition and first reporting periods

Note: Timeline of the EU Public CbCR Directive from adoption through national transposition and first reporting periods.
Source: Own elaboration based on KPMG (2025).

EU non-cooperative list.[6] All other jurisdictions may be aggregated into a single "Others" category. Beyond this floor, Member States decide when the rules take effect, whether firms can invoke a safeguard clause to defer commercially sensitive data, whether website publication is required, how far geographical disaggregation extends, and what penalties apply for non-compliance. These transposition choices produce meaningful variation across the EU. Some Member States have extended separate reporting beyond the non-cooperative list; others have not. Penalty regimes range from no dedicated sanctions to substantial fines and criminal liability.

The Directive's mechanics depend on where the parent group is headquartered. For groups headquartered in an EU Member State, the reporting obligation falls on the ultimate parent itself, which files a single consolidated report in the Member State whose law governs it.[7] EU subsidiaries and branches of that parent do not file separately; the parent's report discharges them.[8] Members of the parent's administrative, management, and supervisory bodies bear collective responsibility for ensuring the report is drawn up, published, and made accessible.[9]

For groups headquartered outside the EU, the obligation is pushed down to EU operations. Each medium-sized or large EU subsidiary and each qualifying branch must publish a report covering the

[6] Article 48c(5) of Directive 2013/34/EU (as amended). The list comprises a "blacklist" and a "grey list," updated periodically by the Council (Appendix B).

[7] Article 48b(1) (first subparagraph) of Directive 2013/34/EU (as amended). Standalone undertakings above the threshold are subject to the same obligation under Article 48b(1) (third subparagraph).

[8] Article 48d(2)(a) of Directive 2013/34/EU (as amended). The Directive also exempts purely domestic single-jurisdiction groups (Article 48b(2)) and groups already filing under the CRD IV banking regime (Article 48b(3)).

[9] Article 48e(1) of Directive 2013/34/EU (as amended).

global group.[10] If the parent does not provide group-wide data, the subsidiary or branch must publish what it has and include a statement explaining the gap. An exemption applies when the non-EU parent itself publishes a compliant report and designates a single EU subsidiary or branch as the publisher.[11] Subsidiary management is responsible only "to the best of their knowledge and ability," a softer standard than the collective responsibility imposed on parent boards.[12] When a non-EU parent refuses to cooperate, a report containing only local data may constitute legal compliance.

Both cases appear in the Romanian sample. Romanian-headquartered groups file the report themselves; the rest are non-EU-parented multinationals filing through their Romanian subsidiaries or branches.

2.1 Romania's transposition: early timing, broad scope, limited sanctions

Romania was the first Member State to transpose the Directive, through regulations adopted in September 2022,[13] in advance of the June 2023 deadline. The rules apply from financial year 2023, making Romania's reports the earliest mandatory disclosures under the framework.

As a non-euro-area country, Romania converted the EUR 750 million threshold into national currency (approximately RON 3.7 billion). At the entity level, subsidiaries are in scope once they qualify as "medium-sized or large" under Romanian accounting law for two consecutive years, determined by exceeding two of three size criteria: balance sheet total, net turnover, and number of employees.[14] Branches fall in scope when their net turnover exceeds the "large undertaking" threshold.[15] The currency conversion and size-test mechanics introduce sensitivity to exchange-rate movements, an issue shared by all non-euro-area Member States.

Beyond who must report, Member States also choose what reporters must disclose, how accessible the data must be, and the consequences of non-compliance. To compare these choices across Member States, we score each national implementation across six dimensions of discretion: (1) early adoption, (2) publication deadline, (3) safeguard clause, (4) website publication, (5) geographical scope, and (6) penalty strength. Each is scored 1–3, where 3 represents the strongest transparency or enforcement choice (Appendix C, Table C.1).

Figure 2 presents the results. Romania scores at the maximum on early adoption. The early timeline shifts the immediate burden of reporting onto subsidiaries of non-EU groups, predominantly from the United States, the United Kingdom, Switzerland, and Japan, since most EU-headquartered multinationals are not yet required to report under their home country's rules.[16]

On geographical scope, Romania extended separate reporting to all EEA jurisdictions (Iceland, Liecht-

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[10] Article 48b(4) (subsidiaries) and Article 48b(5) (branches) of Directive 2013/34/EU (as amended).

[11] Article 48b(6) exempts subsidiaries and branches where the non-EU parent itself publishes a compliant report (free, machine-readable, in an EU official language, on its website, within 12 months) and designates a single EU subsidiary or branch to publish under Article 48d(1). Non-cooperative parents will not use this provision voluntarily.

[12] Article 48b(6) (subsidiaries) and Article 48e(1) (parent boards) of Directive 2013/34/EU (as amended).

[13] Order No. 2048/2022 of the Romanian Ministry of Finance, subsequently amended by Order No. 1730/2023.

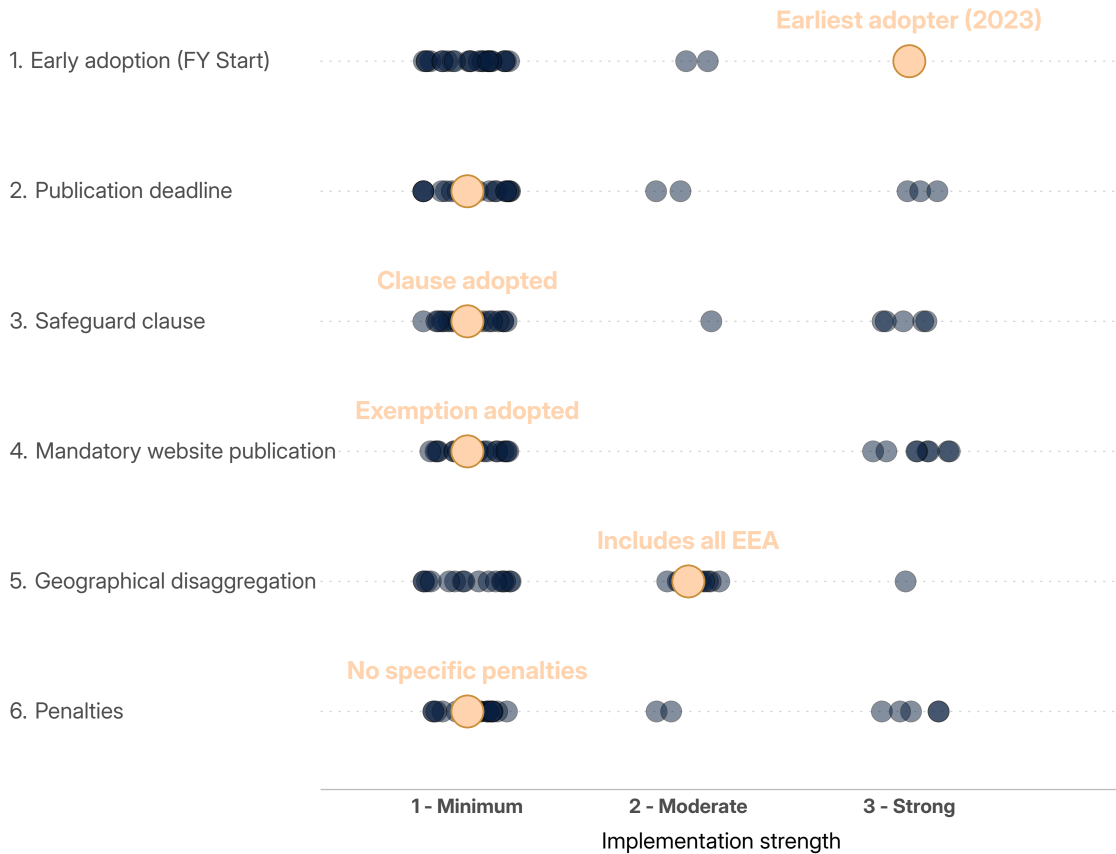
[14] Order 2048/2022, pct. 592^{5}(1), referencing the size definitions in Order 1802/2014.

[15] Order 2048/2022, pct. 592^{6}(4).

[16] Romania's initial transposition could be read as applying to any non-Romanian parent; a 2023 amendment corrected the scope to non-EU parents, aligning with the Directive's intent (Order 2048/2022, pct. 592^{5}(1) of Order 1802/2014, as corrected by Order 1730/2023).

FIGURE 2

Comparative implementation of the EU Public CbCR Directive: Romania vs. EU Member States



Note: Each dot represents one EU Member State, scored on a 1–3 scale across six implementation dimensions of the EU Public CbCR Directive (2021/2101). A score of 1 indicates the minimum standard; 3 indicates the strongest transparency or enforcement choice. Romania is highlighted in orange; all other Member States are shown in blue. The full scoring definitions are provided in Appendix C.

Source: National transposition legislation, PwC EU CbCR Directive Tracker (2025), KPMG (2025), own calculations.

enstein, Norway), which the Directive does not require. The choice demonstrates that Member States can go beyond the minimum.

On two other dimensions, Romania matches the EU majority. It adopted the safeguard clause, which allows firms to defer data whose disclosure would seriously prejudice their commercial position for up to five years (though data on non-cooperative jurisdictions can never be withheld).[17] It also adopted the website publication exemption: entities need not publish the report on their own website if the commercial register provides machine-readable, free access.[18]

Penalty regimes across Member States are generally light, with a few exceptions. Romania imposes no specific penalties for failure to publish, file, or prepare the public CbCR report, while a small minority of Member States have introduced stronger regimes ranging from administrative fines to criminal liability (Republic of Poland, 2024; Kingdom of the Netherlands, 2023; Federal Republic of Germany, 2024; Italian Republic, 2024).

[17] Article 48c(6) of Directive 2013/34/EU (as amended), transposed at pct. 592[9](11)–(13) of Order 1802/2014.

[18] Article 48d(3) of Directive 2013/34/EU, transposed in Romanian law at pct. 592[12](3) of Order 1802/2014 (as amended).

Romania's combination of early timing, broad scope, and a limited penalty regime is the institutional context against which the rest of this note interprets reporting behaviour. Two patterns deserve advance flagging: the early timing means the sample is dominated by non-EU multinationals filing through their EU subsidiaries (Section 3.4.3), and the absence of dedicated penalties may shape compliance rates (Section 3.3).

3 Early disclosures: data, quality, and constraints

Romania's early transposition produced the first public CbCR dataset under the EU Directive: 144 multinationals across financial years 2023 and 2024, predominantly headquartered outside the EU. This section describes the reporting template, explains how the dataset was constructed, assesses the regime's coverage and additionality, and documents where the main gaps in reporting quality appear.

3.1 The public CbCR reporting template

Public CbCR reports follow a standardised template with four sections:[19] (1) general information on the reporting entity (name, headquarters jurisdiction, financial year, currency); (2) the country-by-country financial table; (3) a list of constituent entities and their business activities by jurisdiction; and (4) disclosures on omitted information under the safeguard clause. Illustrative examples using Booking Holdings Inc.'s 2023 report are provided in Appendix D.

The core of the report is the country-by-country table, illustrated in Figure 3. Each row corresponds to a jurisdiction, and each column to one of six quantitative variables: total revenues, profit or loss before income tax, income tax paid (cash basis), income tax accrued, accumulated earnings, and number of employees.[20] As described in Section 2, EU Member States and non-cooperative jurisdictions receive separate rows; all remaining jurisdictions may be aggregated into "all other tax jurisdictions." In the Booking example, the table shows separate lines for EU countries and listed jurisdictions such as Panama and Russia, alongside an aggregated residual.

The public template is narrower than the private OECD CbCR that the same firms already file with tax authorities.[21] Three differences matter for analysis. The OECD template requires jurisdiction-by-jurisdiction reporting for every country; the public template allows aggregation into "Others," leaving most non-EU, non-listed activity in a single residual (Section 4.1). The OECD template mandates ten financial variables, including tangible assets and stated capital; the public template requires only six, excluding indicators such as tangible assets, which are central to assessing real economic presence. The OECD template also separates related from unrelated party revenues, enabling analysis of intra-group transactions while the public template does not.

[19] Implementing Regulation (EU) 2024/2952, issued under the authority of Directive (EU) 2021/2101. Available at `https://eur-lex.europa.eu/eli/reg_impl/2024/2952/oj`.

[20] Article 48c(2) of Directive 2013/34/EU (as amended). The template also requires entity identification and a description of business activities, but this note focuses on the six quantitative variables.

[21] A detailed comparison is provided in Table A.1 (Appendix A).

FIGURE 3

Public CbCR example: Country-by-country table (Booking Holdings Inc., 2023)

Section 2 – Overview of information on a country-by-country basis

Tax jurisdiction	Country code	Revenues	Profit (loss) before income tax	Income tax paid – on cash basis	Income tax accrued – current year	Accumulated earnings	Number of employees
Austria	AU	12088736.742	7687527.833	1835883.279	1675893.1	13395524.705	35.0
Belgium	BE	7147057.202	3393952.291	677568.372	859143.163	8018533.746	18.0
Bulgaria	BG	2249445.485	1408446.434	155863.639	140844.642	2692220.011	11.0
Croatia	HR	10178385.825	7669732.794	1465465.229	1423163.056	13652119.778	35.0
Cyprus	No	-705157.283	-713357.693	78103.151	-186302.36	-396510.379	0.0
Czech Republic	CZ	5571617.346	3675566.484	732237.313	721131.892	7736437.297	28.0
...							
Hong Kong	HK	1914545.301	1788899.226	44735.004	276938.468	6159649.016	28.0
Israel	IL	23692905.927	3697374.205	816813.584	1271553.338	-844317.168	82.0
Malaysia	MY	3142790.309	5844140.206	2927372.501	2232420.855	18983915.348	2247.0
Thailand	TH	9826255.534	40212419.307	2791580.3	3578858.402	166245145.204	3396.0
Vietnam	VN	2973688.532	2495454.955	514543.793	542280.214	6427769.618	59.0
Costa Rica	CR	2663682.074	1253755.064	373286.995	366590.531	2193220.324	12.0
Panama	PA	35490.63	35490.63	0.0	0.0	964103.14	0.0
Russia	RU	3136582.134	522364.374	12989.294	172900.714	7393589.193	7.0
All other tax jurisdictions (aggregated basis)	-	5848345729.551	-839840313.374	440197921.355	362079348.492	30852540590.533	10623.287

Note: This figure shows the country-by-country table from Booking Holdings Inc.'s public CbCR report (FY2023). Rows corresponding to intermediate tax jurisdictions are omitted for readability and indicated by ellipses.
Source: Booking.com

An advantage of public CbCR is that Section 1 of the report explicitly names the ultimate parent entity, the reporting entity, and the ultimate parent country, information that voluntary disclosure frameworks often omit.

Beyond these structural differences between the public and private templates, Romania's early reports also vary in format. The Commission Implementing Regulation establishing the standardised format (European Commission, 2024) was adopted only in November 2024, so the Romanian Ministry of Finance allowed companies to use the private CbCR format, the EU template, or any layout containing the required information (Ministry of Finance (Romania), 2024). Early reports consequently vary widely in structure, complicating extraction and cross-company comparison. This will improve as the common template takes effect for financial years starting on or after 1 January 2025.

3.2 Accessibility and data construction

3.2.1 The accessibility problem

Each multinational operating in Romania publishes its CbCR report independently, on its company website or investor relations page, in Romanian, English, or both. No centralised database collects these disclosures, and which companies fall within the Directive's scope, let alone which have actually filed, is not publicly documented. Building a cross-company dataset therefore requires multilingual searches across corporate websites, followed by manual extraction from PDFs of varying formats. The result is an accessibility gap: reports are publicly available, but the data they contain are not accessible for systematic analysis.

3.2.2 Sample construction

Financial tables were manually extracted from the published PDFs, monetary values converted to EUR using ECB annual average exchange rates, and all figures standardised to single units. The dataset covers financial years 2023 and 2024 and forms part of the Public CbCR Database, which consolidates mandatory and voluntary CbCR disclosures across jurisdictions (Aliprandi et al., 2023; Aliprandi and Borders, 2024). The full dataset is publicly accessible through the Taxplorer platform (Appendix E).

Distinguishing mandatory from voluntary reports is not straightforward. Some multinationals that had been publishing CbCR data voluntarily for years also filed reports that comply with the Romanian obligation. Others that were clearly responding to the Directive framed their disclosures as "voluntary" or "early adoption." We classify a report as directive-driven if the company (i) first included Romania-specific data in 2023, coinciding with the entry into force of Romania's transposition, and (ii) references the Directive in the report. This yields 144 directive-driven and 35 voluntary multinationals, the latter filing 40 reports across the two years.

Data collection closed in February 2026 and reflects early-adoption practice, which is still evolving.

3.2.3 Sample composition

Table 1 summarises the sample. The 144 multinationals produced 164 reports (some firms report for both financial years), covering 152 distinct jurisdictions. Each multinational reports data for approximately 17 jurisdictions on average. The distribution of employees and revenues is heavily right-skewed: median total revenues are 47.28 million against an average of 1.46 billion, indicating that a small number of large multinationals account for a disproportionate share of the sample's economic footprint.[22] Figure 4 shows the distribution by headquarters country and sector. As expected, the sample is mainly composed of non-EU multinationals. The United States dominates (66 multinationals), followed by Switzerland (18), Japan (16), and United Kingdom (14). Non-EU groups predominate because EU-headquartered multinationals are not yet required to report under their home country's

[22] We compared the sample against the Fair Tax Foundation's October 2025 assessment (Appendix F, Table F.1).

rules. The largest sectors are “Industrials & Manufacturing,” “Biomedical,” and “Technology and IT Services.”

TABLE 1

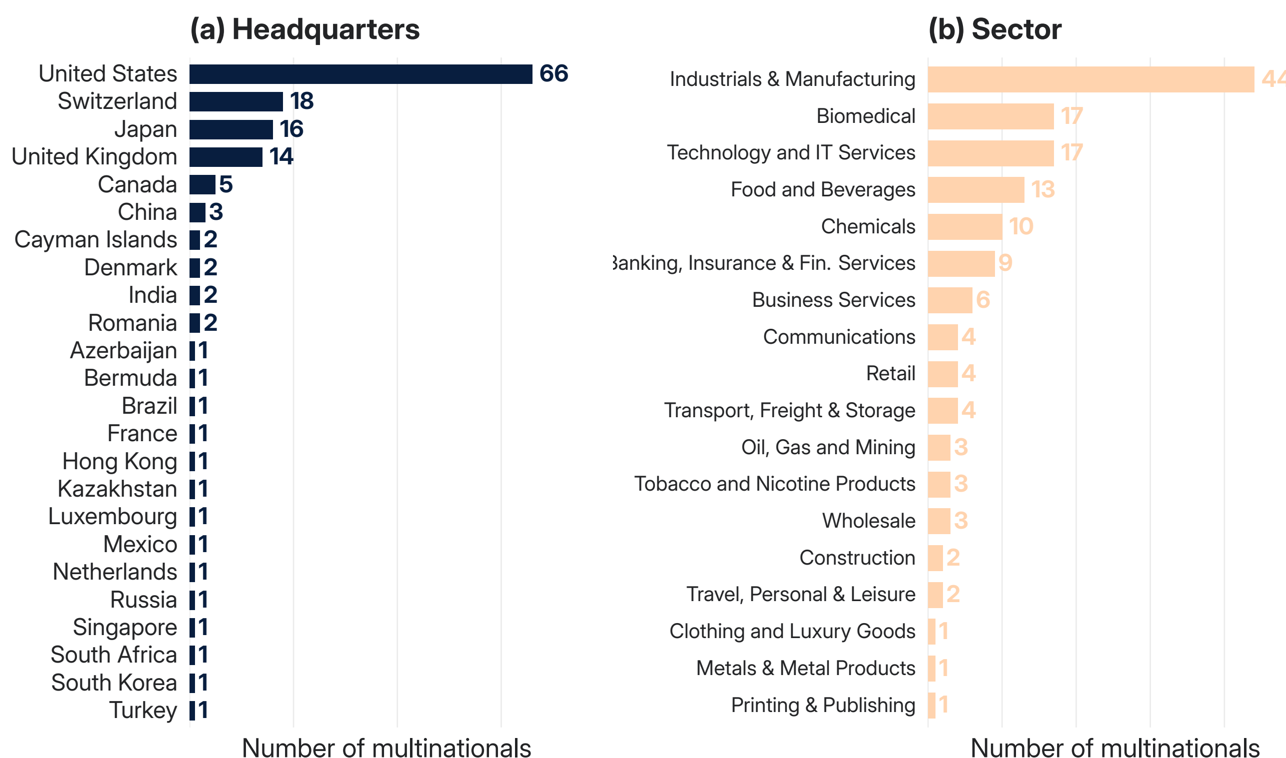
Summary statistics of the reporting sample

Variable	Value
Reporting years	2023, 2024
Number of distinct multinationals	144
Number of reports	164
Average number of employees	2,432
Median number of employees	120
Average total revenues	1.46 billion
Median total revenues	47.28 million

Note: Summary statistics for 144 multinationals filing public CbCR reports in Romania (financial years 2023 and 2024). The sample consists of 2824 observations, each corresponding to a reported jurisdiction (or aggregated "all other jurisdictions" category) for a given multinational and reporting year.
Source: Public CbCR Database.

FIGURE 4

Sample composition: headquarters country (left) and sector (right)



Note: Distribution of 144 multinationals filing public CbCR reports in Romania (financial years 2023 and 2024) by ultimate parent entity location (left, 164 reports in total) and by sector (right).
Source: Public CbCR Database.

3.3 Coverage and additionality

The Directive's effectiveness depends in part on its reach. If a large share of multinationals that meet the revenue threshold and operate in Romania do not report, the regime faces an enforcement or awareness gap. If the reports come predominantly from firms that were already disclosing voluntarily, the Directive formalises existing transparency without extending it to new populations. This section addresses both questions.

3.3.1 The coverage gap

To assess coverage, we compare the number of multinationals expected to publish reports with the number that actually have. No official list of in-scope entities exists. We approximate the expected population using the OECD's aggregated CbCR statistics on multinational groups present in each jurisdiction, which draw on the confidential filings of groups above the EUR 750 million threshold. From these counts, we estimate how many groups meeting the threshold have a subsidiary in Romania.[23]

Because Romania's early implementation places the immediate obligation on non-EU-headquartered groups (Section 2.1), while EU-parented multinationals will only enter scope once their home countries transpose the Directive, the comparison focuses on non-EU countries.

Figure 5 reveals a substantial gap. Overall, only 20% of the 569 non-EU multinationals estimated to fall within scope have published a report. The gap spans all major headquarters countries (Figure 5). The United States, the largest source, accounts for 306 expected multinationals but only 66 published reports. Japan and Switzerland show similar patterns (77 vs. 16 and 62 vs. 18). The United Kingdom is the fourth-largest source of actual reports (14), but the OECD does not publish statistics for UK-headquartered multinationals at this disaggregation level, so no expected count is available.

At least two factors likely explain the gap. Romania was the first Member State to require reporting, at a time when no other country had transposed the Directive, no common template existed, and group-level awareness of the new obligation was still developing. The absence of dedicated penalties for non-compliance (Section 2.1) further reduces the cost of non-reporting.

3.3.2 Additionality: mandatory vs. voluntary reporting

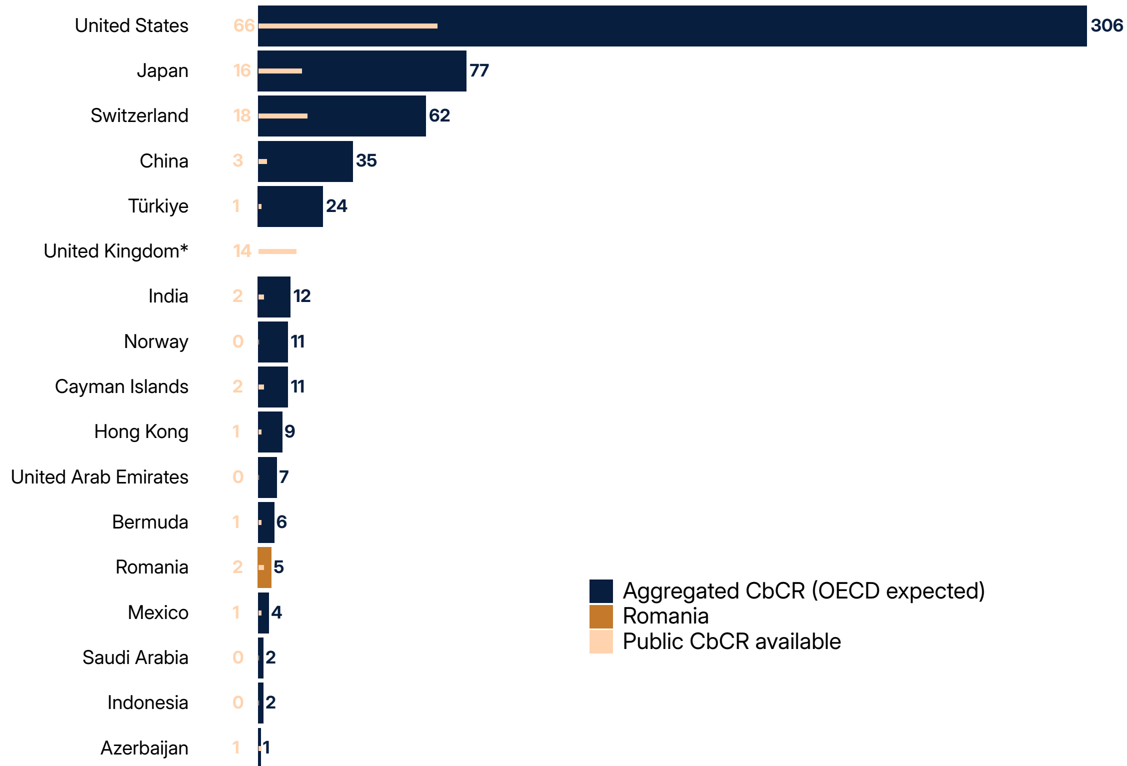
Before the Directive, a subset of multinational companies published country-by-country or jurisdiction-level tax information voluntarily, typically within annual reports, sustainability reports, or standalone tax transparency statements (Godar et al., 2024). If the Romanian reports come predominantly from these existing publishers, the Directive formalises existing transparency rather than extending it. Comparing voluntary disclosures with the new mandatory reports tests this.

To this end, we draw on the Public CbCR Database, which tracks both mandatory and voluntary country-by-country disclosures (Appendix E). Figure 6 compares the number of multinationals dis-

[23] The OECD count may overstate the expected population, since it includes all Romanian subsidiaries regardless of size while the Romanian obligation applies only to medium-sized or large subsidiaries. Appendix G shows this is unlikely to explain the gap: average subsidiary revenues in the OECD data exceed the Romanian size thresholds for virtually every headquarters country, and the estimates trend upward over time.

FIGURE 5

Expected vs published public CbCR reports in Romania



Note: Expected reports estimated from aggregated OECD CbCR statistics (2022): multinational groups with at least one subsidiary in Romania meeting the EUR 750 million threshold. Actual reports from the public CbCR sample (financial years 2023 and 2024). Romania (host country) is highlighted separately. EU-headquartered parent countries other than Romania are omitted as their groups are not yet in scope under Romania's phased implementation. *United Kingdom: OECD aggregated CbCR statistics are not available at this level of disaggregation; only actual reports are shown.
Source: Public CbCR Database; OECD Aggregated CbCR Statistics 2025.

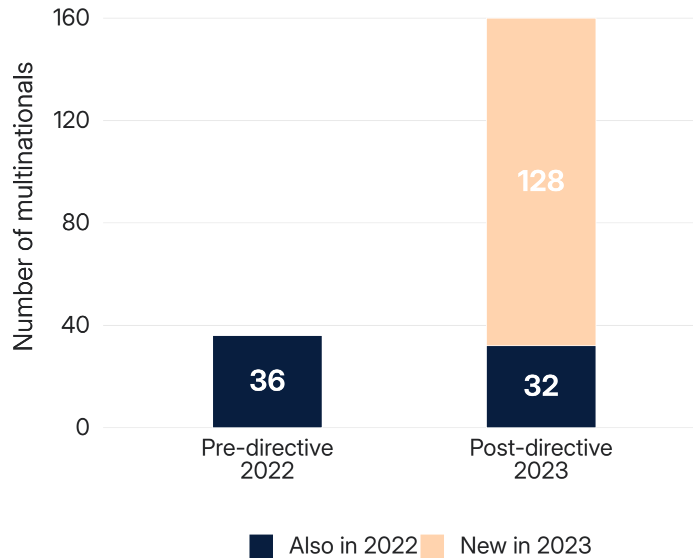
closing Romania-specific data before and after the Directive's entry into force. In 2022, 36 multinationals published voluntary reports including Romania. By 2023, 160 multinationals reported Romania-specific data, of which 32 had also reported in 2022. 4 voluntary reporters from 2022 did not continue: BayWa, SOL, and TIM discontinued their voluntary CbCR publication entirely, while Mace continued publishing but no longer disaggregated Romania as a separate jurisdiction.[24] The remaining 128 are new reporters, the vast majority entering through the mandatory regime. This comparison is indicative rather than exact, as differences in reporting scope, timing, and data definitions between voluntary and mandatory frameworks limit strict comparability. Nevertheless, the scale of the increase strongly suggests that the Directive is generating disclosure from previously non-transparent firms.

The two channels also differ in composition. Mandatory reports are dominated by non-EU-headquartered multinationals, particularly from the United States; voluntary disclosures come more frequently from European-headquartered firms in the United Kingdom, the Netherlands, and the Nordics. The Directive is therefore expanding disclosure among groups with no voluntary-reporting history, rather than

[24] Mace Group published a CbCR covering 51 jurisdictions in 2023, but Romania does not appear as a separate line item.

FIGURE 6

Multinationals reporting for Romania: pre- and post-directive



Note: The 2022 bar counts voluntary reporters disclosing Romania-specific data. The 2023 bar includes all reporters (voluntary and mandatory), decomposed into continuing and new. Differences in scope between the two frameworks limit strict comparability.
Source: Public CbCR Database.

formalising the disclosure of firms that already reported.

Having established that the sample is partial but additive, the next question is what these reporters actually disclose.

3.4 Reporting quality

Two main dimensions determine what the reports actually reveal: variable completeness, whether multinationals report all six required items, and geographical scope, how many jurisdictions each report individually identifies. This section evaluates both and, where disclosure falls short, investigates the drivers.

3.4.1 Variables

The Directive requires six variables for each jurisdiction: total revenues, profit or loss before tax, income tax paid (cash basis), income tax accrued (the tax expense recognised in the accounts), accumulated earnings (retained profits built up over time), and number of employees. Each row in a CbCR report corresponds to one jurisdiction, so a multinational reporting across ten countries produces ten rows, each listing values for these six items. To assess completeness, we count a multinational as reporting a variable if at least one of its jurisdiction rows contains a non-missing value; this is a generous measure, since a firm could report a variable for one jurisdiction and leave it blank for all others.

Across the 144 directive-driven multinationals and their 164 reports, completeness is high (Table 2).

91% of reports include all six variables, and no individual variable falls below 95% coverage. The distinction between tax paid (cash actually transferred to the tax authority during the year) and tax accrued (the tax charge recognised in the financial statements) matters for analysis: the two can diverge substantially due to timing differences, loss carryforwards, and deferred tax adjustments. Both are reported at comparable rates.

15 multinationals go beyond the minimum by reporting a split of revenues into related-party and unrelated-party components. 6 of these multinationals also report tangible assets and stated capital while the remaining 9 report the revenue split only.

The Directive's minimum variable set functions as an effective ceiling: the majority of firms report what is required and nothing more. The related/unrelated revenue split and tangible assets are already collected in the confidential CbCR filings that multinationals submit to tax authorities under OECD BEPS Action 13 (OECD, 2015). Adding them to the public template would enable analysis of intra-group transactions and mismatches between profits and real economic presence.

TABLE 2

Number of multinationals reporting required variables

Variable	Multinationals	Reports	% of reports
Number of multinationals (reports)	144	164	
Total revenues	139	155	95%
Profit before tax	140	157	96%
Tax paid	141	159	97%
Tax accrued	140	158	96%
Employees	141	159	97%
Accumulated earnings	139	155	95%
All main variables	136	150	91%

Note: "Multinationals" counts unique multinationals reporting each variable across financial years 2023 and 2024 (a multinational reporting in both years is counted once). "Reports" counts individual filings (multinational-year). The denominator is 144 unique multinationals (164 reports).
Source: Public CbCR Database.

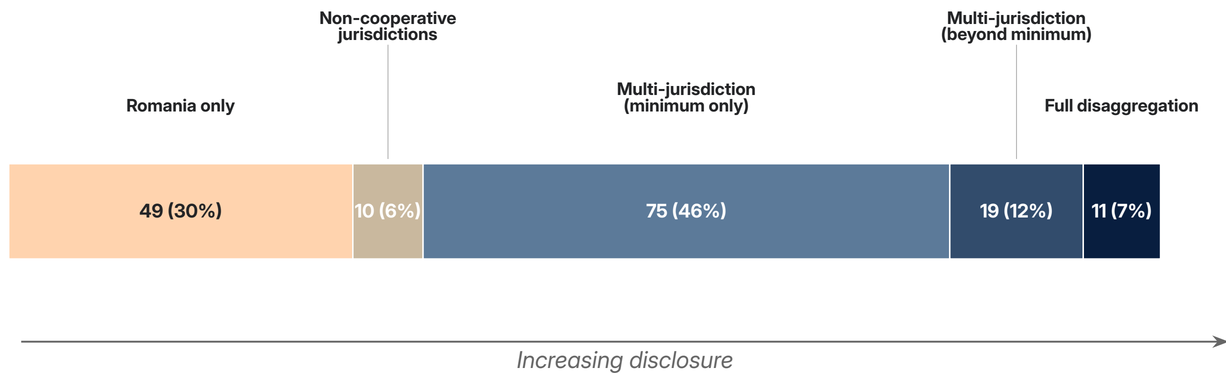
3.4.2 Geographical disaggregation

The level of geographical disaggregation varies widely across reports. Some multinationals provide jurisdiction-by-jurisdiction data for their entire global operations. Others report only Romanian data, with all remaining activity aggregated into a single residual row. To capture this spectrum, we classify each report into five categories based on the jurisdictions individually identified:

- *Romania only*: data provided only for Romania, with or without an aggregated "Others" row. No other jurisdiction is individually identified.
- *Non-cooperative jurisdictions*: at least one jurisdiction on the EU non-cooperative list (the black-

FIGURE 7

Distribution of reports by geographical disaggregation



Note: Distribution of 164 public CbCR reports filed in Romania (financial years 2023 and 2024) by level of geographical disaggregation. "Romania only" includes reports with or without an aggregated "Others" row. "Multi-jurisdiction (minimum only)" covers reports whose individually identified jurisdictions are entirely within the required minimum: EU Member States, EEA states (Iceland, Liechtenstein, Norway), and the EU non-cooperative list jurisdictions for the relevant year. "Multi-jurisdiction (beyond minimum)" covers reports that individually identify at least one third-country jurisdiction outside the required minimum. "Full disaggregation" requires individual reporting for all jurisdictions, including the ultimate parent entity's home jurisdiction.
Source: Public CbCR Database.

list, or the grey list where the jurisdiction has been listed for at least two consecutive years) is individually reported, but no other EU Member State beyond Romania.

- *Multi-jurisdiction (minimum only)*: at least one other EU Member State or EEA jurisdiction is reported alongside Romania, but no jurisdiction outside the required minimum (EU Member States, EEA states, and the EU non-cooperative list jurisdictions for the relevant year).
- *Multi-jurisdiction (beyond minimum)*: in addition to the EU and EEA scope, the report individually identifies at least one third-country jurisdiction outside the required minimum.
- *Full disaggregation*: jurisdiction-by-jurisdiction data including the ultimate parent entity's home jurisdiction, with no aggregated "Others" category.

These categories measure disclosure scope, not compliance. A "Romania only" report may constitute full legal compliance where the parent did not cooperate (Section 3.4.3), or a potential compliance failure where no justification is provided. The split within Multi-jurisdiction isolates voluntary transparency: reports in the "minimum only" subcategory disclose exactly what is required; those "beyond minimum" provide some information on third countries that the Directive permits to be aggregated.

Figure 7 shows the distribution across these five categories. 49 reports (30%) provide data for Romania only, the most limited end of the spectrum. This category includes some of the largest multinationals in the sample, such as Apple, Nestlé, and Procter & Gamble, whose public CbCR reports cover only their Romanian operations. The 38 multinationals in this category are headquartered in 9 countries, led by the United States of America (23), Switzerland (7), and Japan (2), with the remaining

6 multinationals spread across 6 other jurisdictions; the reasons for this limited scope are analysed in Section 3.4.3.

10 reports go one step further, but still at the minimum required by the Directive: they individually identify at least one jurisdiction on the EU non-cooperative list, but do not disaggregate any other EU Member State.

The majority of reports provide broader coverage. 94 reports (57%) include at least one other EU Member State alongside Romania, and a further 11 provide full jurisdiction-by-jurisdiction data with no aggregation. Together, these account for 64% of the sample.

Within the multi-jurisdiction group, most reports stop at the minimum required by the Directive: 75 (80%) restrict disclosure to EU Member States, EEA states, and non-cooperative list jurisdictions. Only 19 (20%) individually identify a third-country jurisdiction beyond the minimum. Multi-jurisdiction reports still aggregate most non-minimum activity into the "Others" residual (Section 4.1); only fully disaggregated reports permit jurisdiction-level analysis of revenues, profits, and tax payments across the whole group.

3.4.3 Comply, refuse, or defer: drivers of incomplete disclosure

As seen in the previous sections, not all reports provide full disclosure, some cover only Romania, while others span many jurisdictions but omit required variables. In total, 63 of 164 reports (38%) provide incomplete disclosures, consistent with the Fair Tax Foundation's independent assessment of 190 reports, in which 32% of parent companies confine disclosure to a single country and a further 6% disclose only EU-listed tax havens (Monaghan and Almond, 2026). This subsection asks why.

To classify the reasons, we read each of the 164 reports in full, including the preamble, cover page, and body text.[25] This proved essential: key statements frequently appear in the preamble rather than in Section 4, the designated part of the reporting template where firms are expected to disclose what information has been omitted. 75 reports (46%) omit Section 4 entirely.

Four categories of reasons emerge: parent data refusal, safeguard clause invocation, regulatory uncertainty, and unexplained omissions (Figure 8).

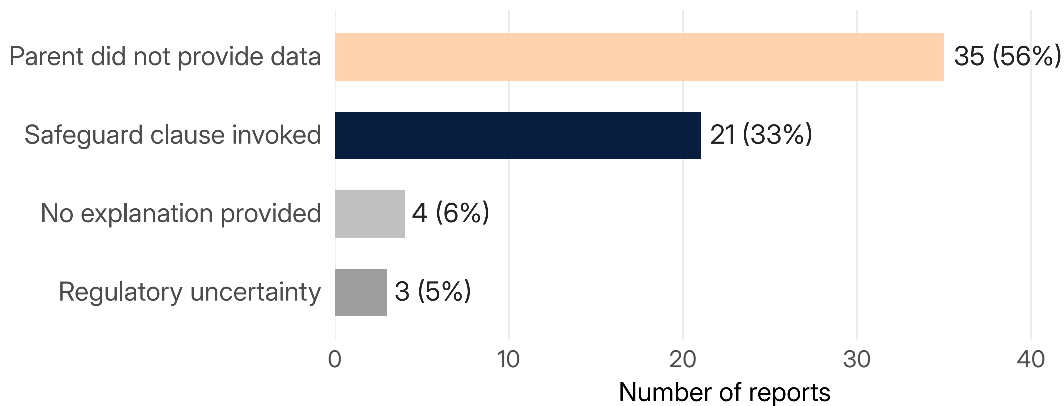
Parent data refusal. The most common reason for limited disclosure is parent non-cooperation. 35 reports indicate that the Romanian subsidiary requested group-wide data from the ultimate parent, but the parent did not provide it. This category accounts for most of the Romania-only reporters identified in Section 3.4.2, including Apple, Nestlé, Procter & Gamble, Microsoft, Pfizer, and PepsiCo.[26] These are not safeguard invocations: the subsidiary complies to the extent possible, disclosing Romanian operations, but cannot report on the wider group. The pattern is concentrated among US-headquartered

[25] Classification uses bilingual keyword detection (English and Romanian) with context-aware matching, supplemented by manual visual validation of all cases. Image-based content (scanned letters, stamp-signed declarations) was read with OCR. Where firms published a companion declaration alongside the CbCR report, both documents were reviewed. Appendix H provides verbatim excerpts illustrating each category.

[26] Appendix H provides representative excerpts. An additional illustrative example (Apple Inc.) is provided in Appendix I. Microsoft and Procter & Gamble have since broadened their disclosure, publishing multi-jurisdiction reports for a later financial year, released in late June 2026 and therefore not covered by our sample.

FIGURE 8

Reasons for incomplete disclosure



Note: Covers the 63 reports with incomplete disclosures (limited geographical scope, omitted variables, or both). Reasons identified from all textual evidence in the report (Section 4, preamble, body text). "Safeguard clause invoked" includes firms citing competitive disadvantage, commercial sensitivity, or national security. "Parent did not provide data" refers to cases where the subsidiary requested group-wide data but the ultimate parent did not make it available.
Source: Public CbCR Database.

multinationals, though it also arises with parents in Japan, Switzerland, China, and Russia.

Parent non-cooperation is a structural feature of the Directive's design, not an anomaly of early adoption. Subsidiary management is responsible "to the best of their knowledge and ability" (Section 2.1), an assumption that fails when the ultimate parent is outside the EU and does not share the information on the whole group. When the Directive applies across all Member States, the same pattern can produce fragmented single-country filings: each subsidiary reports for its own jurisdiction, with no mechanism to reconstruct a group-level picture.[27] The pattern illustrates the limits of subsidiary-level obligations when group structures span multiple regulatory environments.

Safeguard clause. The Directive allows firms to temporarily withhold information whose disclosure would seriously prejudice their commercial position, for up to five years (Section 2.1). 21 reports invoke this provision.[28] The stated justifications fall into two groups. Some firms cite Romania's early adoption: because most other Member States have not yet implemented the Directive, disclosing now would put them at a competitive disadvantage. This justification will lose its factual basis once the Directive applies EU-wide from financial year 2025; Gundert et al. (2024) document how divergent transposition timelines create these uneven disclosure burdens. Other firms cite generic commercial sensitivity that would apply regardless of timing.

In practice, most (14 of 21) withhold jurisdiction-level data, reducing their reports to Romania-only or partial geographical coverage. A smaller number omit specific variables or withhold all data. 11 of the 21 commit to disclose fully once the regime applies EU-wide.

Regulatory uncertainty. 3 reports cite ambiguity about which data the reporting template requires, without invoking the safeguard clause or reporting parent non-cooperation. The common template, standardised by the Commission in 2024, should resolve most of these cases for future filings.

[27] See Article 48b(6) and the related discussion in Section 2.

[28] Appendix H reproduces verbatim excerpts illustrating the range, from jurisdiction-level omissions to total withholding.

Unexplained omissions. A further 4 reports provide only partial data without any credible textual explanation. The Directive operates on a disclose-or-explain basis: firms must either report in full or state what was withheld and why. In these cases, the "explain" component is entirely absent or, in one case, inconsistent with the report's actual scope (Section 4 states nothing was omitted despite the report covering only Romania). The absence of dedicated penalties (Section 2.1) plausibly facilitates this outcome.

A template design flaw compounds the problem across all four categories. Section 4 of the reporting template requires firms to disclose what information has been omitted, but does not mandate a positive confirmation that nothing was withheld. Of the 75 reports that omit Section 4, 48 are otherwise substantively complete and the omission is likely benign. In the remaining 27, the report has limited scope, and the absence of a disclosure statement makes it impossible to distinguish a legitimate aggregation from silent withholding.

The four categories differ in their persistence. Two will fade as the regime matures: safeguard invocations citing early adoption will lose force when the Directive applies EU-wide, and regulatory uncertainty will resolve with template standardisation. Two are more resistant: parent non-cooperation is structural, since the current legal architecture does not compel a non-EU parent to supply data, and unexplained omissions reflect limited enforcement that stronger penalties could address.

Even where multinationals do provide multi-jurisdiction data, the Directive's geographical design determines how much is actually visible. The next section examines this transparency boundary.

4 The transparency boundary

The Directive mandates separate reporting for EU Member States and non-cooperative jurisdictions. All remaining countries may be aggregated into a single residual category.[29] Non-cooperative jurisdictions receive the strongest transparency guarantee, since the safeguard clause cannot be invoked for them, making disclosure unconditional. This section examines what falls outside this transparency perimeter. How much economic activity is absorbed by the residual category? And does the non-cooperative jurisdiction list, the Directive's most protected disclosure requirement, target the jurisdictions where profit shifting risk is greatest?

4.1 The "Others" category: where most economic activity is aggregated

When a multinational files a CbCR report, each EU Member State and each non-cooperative jurisdiction gets its own row. All remaining countries are aggregated into a single aggregate line labelled "Others." For a US multinational reporting via its Romanian subsidiary, this means that the entire United States, along with all non-EU, non-listed jurisdictions, may appear as a single number. The residual absorbs the majority of reported economic activity.

To quantify this, we focus on the 104 reports that disaggregate beyond Romania, excluding Romania-only reports (which contain no data beyond Romania) and reports that list every jurisdiction individ-

[29] Article 48c(5) of Directive 2013/34/EU (as amended).

TABLE 3

Percentage share of reporting in the "Others" category, by parent jurisdiction disclosure

	Aggregate 'Others' share (%)		
Variable	All	Parent aggregated	Parent reported separately
Revenue	74	82	18
Employees	72	75	31
Profit	71	77	8
Tax paid	75	79	20
Tax accrued	75	79	19

Note: Share of each variable's total value reported within the "Others" category, for the restricted sample of 104 reports that disaggregate beyond Romania. "All" pools the full restricted sample. "Parent aggregated" (72 multinationals): the parent jurisdiction is not reported as a separate line item and is subsumed in "Others." "Parent reported separately" (8 multinationals): the parent jurisdiction appears as a distinct row. Each column computes the share within its own subsample. Only positive values are used; negative values are excluded.
Source: Public CbCR Database.

ually with no aggregate row. Of these, 92 include an "Others" row; the remaining 12 report selected jurisdictions but include no residual category at all, meaning data for unlisted jurisdictions is simply absent.

Table 3 quantifies the concentration. Across the full restricted sample, 71% of profits and 74% of revenues fall within "Others." The residual is dominated by parent-country activity, not by a diverse set of small jurisdictions.

The table splits the sample by whether the multinational reports its parent jurisdiction (the country where the group's ultimate parent is registered: the United States for Apple, Switzerland for Nestlé, Japan for Toyota) as a separate line item. 72 multinationals do not ("Parent aggregated"): all parent-country activity is subsumed in the aggregate, and the "Others" share reaches 77% of profits and 82% of revenues. For the 8 that do ("Parent reported"), the share drops to 8% and 18%.

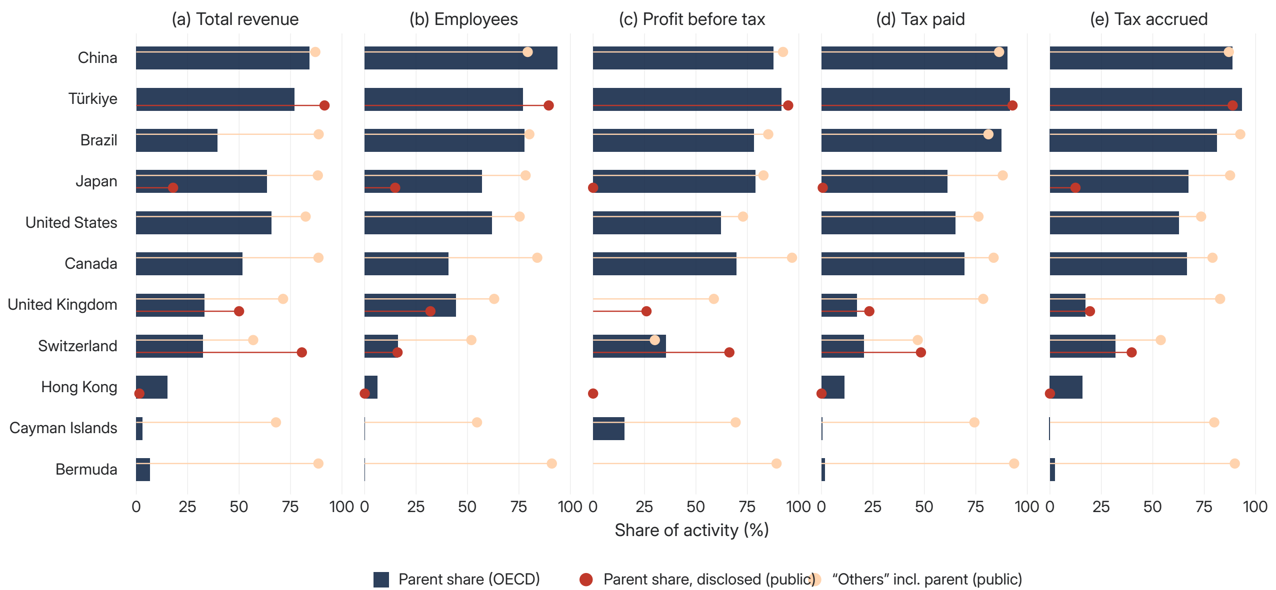
Figure 9 validates the parent-country interpretation using OECD aggregate CbCR statistics.[30] For the 11 most-represented headquarters countries, the figure compares the parent-jurisdiction share in OECD data (blue bars) with the "Others" share in the Romanian data (gold lollipops). The close alignment confirms the interpretation: "Others" is largely a proxy for parent-jurisdiction activity.

The pattern varies by headquarters country. US and Japanese multinationals concentrate a large share of worldwide activity in their home jurisdiction: for US firms, the OECD parent share reaches 66% of revenue and 62% of employees. Multinationals registered in the Cayman Islands or Bermuda present the opposite pattern: negligible domestic activity. These are typically US or Chinese groups whose ultimate parent is legally domiciled offshore; the "parent jurisdiction" in the CbCR data is the Cayman Islands or Bermuda, but the firm's actual operations are elsewhere. Swiss multinationals are globally diversified, with a lower parent-jurisdiction share.

[30] OECD aggregate CbCR data can be further explored using the interactive CbCR Explorer at `https://taxobservatory.shinyapps.io/CbCR_Explorer/`.

FIGURE 9

Share of multinational activity reported in parent jurisdiction and in the "Others" category



Note: Blue bars show the percentage of worldwide activity attributed to the parent jurisdiction, using OECD aggregate CbCR statistics for the 11 most-represented headquarters countries in the Romanian sample. Gold lollipops show the share of activity reported in the "Others" category for multinationals that do not disclose their parent jurisdiction as a separate line item (parent activity is subsumed in "Others"). Red lollipops show the parent-jurisdiction share for multinationals that do report their parent jurisdiction separately. The proximity of gold and red lollipops to the blue bars indicates that the "Others" category is largely driven by parent-jurisdiction activity. Countries are ordered by average OECD parent-jurisdiction share across all five variables.
Source: Public CbCR Database; Aggregated OECD CbCR Statistics 2025.

For each of these headquarters countries, the "Others" share in the Romanian data closely tracks the OECD parent share. This pattern partly reflects the composition of the early reporting population, which consists almost entirely of non-EU-headquartered groups whose parent jurisdiction falls outside the EU and is therefore subsumed in the residual. When EU-headquartered multinationals begin reporting under their home country's transposition, the parent jurisdiction will already have a dedicated row as an EU Member State, and the "Others" share should be substantially smaller.

The pattern is not only a directive design constraint (separate disclosure is required for EU Member States and non-cooperative jurisdictions, with everything else aggregable[31]); it also creates space for the strategic aggregation documented in prior research (Akamah et al., 2018; Dyreng et al., 2020). The same pattern will potentially recur in every Member State's data.

4.2 The non-cooperative jurisdiction list as a transparency tool

Alongside separate disclosure of EU Member States, the Directive requires separate disclosure of jurisdictions on the EU list of non-cooperative jurisdictions for tax purposes, adopted by the Council on 5 December 2017 as part of the EU's external strategy on taxation. The list has two tiers: a "blacklist" of jurisdictions that have failed to meet EU criteria, and a "grey list" of those with pending reform com-

[31]Article 48c(5) of Directive 2013/34/EU (as amended).

mitments. Grey-listed jurisdictions trigger separate reporting only if they have been listed for at least two consecutive years; the composition of both annexes changes with each Council update, so the set of jurisdictions in scope shifts across reporting years (Appendix B). This is the Directive's strongest transparency guarantee: firms must disclose data for listed jurisdictions, and the safeguard clause cannot be invoked to withhold it. How much this guarantee reveals depends on which jurisdictions the list actually covers.

The list's criteria fall into three families: tax transparency (notably adherence to international exchange-of-information standards), fair taxation (the absence of harmful preferential regimes and of offshore structures attracting profits without real economic activity), and implementation of anti-BEPS minimum standards. The criteria measure qualitative compliance with international standards, not the empirical geography of profit shifting (Laffitte and Montagner, 2025). A jurisdiction can satisfy them while still offering very low effective tax rates, including to mobile profits with genuine economic activity. The jurisdictions where profits today concentrate, and where profit shifting may occur, therefore overlap only in part with the list's scope.

The aggregate reach of the list is limited. Listed jurisdictions account for about 1% of global foreign profits reported in confidential CbCR data, a share that has not grown over time (Laffitte and Montagner, 2025). The safeguard-clause exclusion and the mandatory disclosure therefore operate over a narrow slice of global economic activity. In the Romanian sample, 94 multinationals report at least one listed jurisdiction: 75 report a blacklisted jurisdiction and 88 a grey-listed one, with some appearing in both categories.

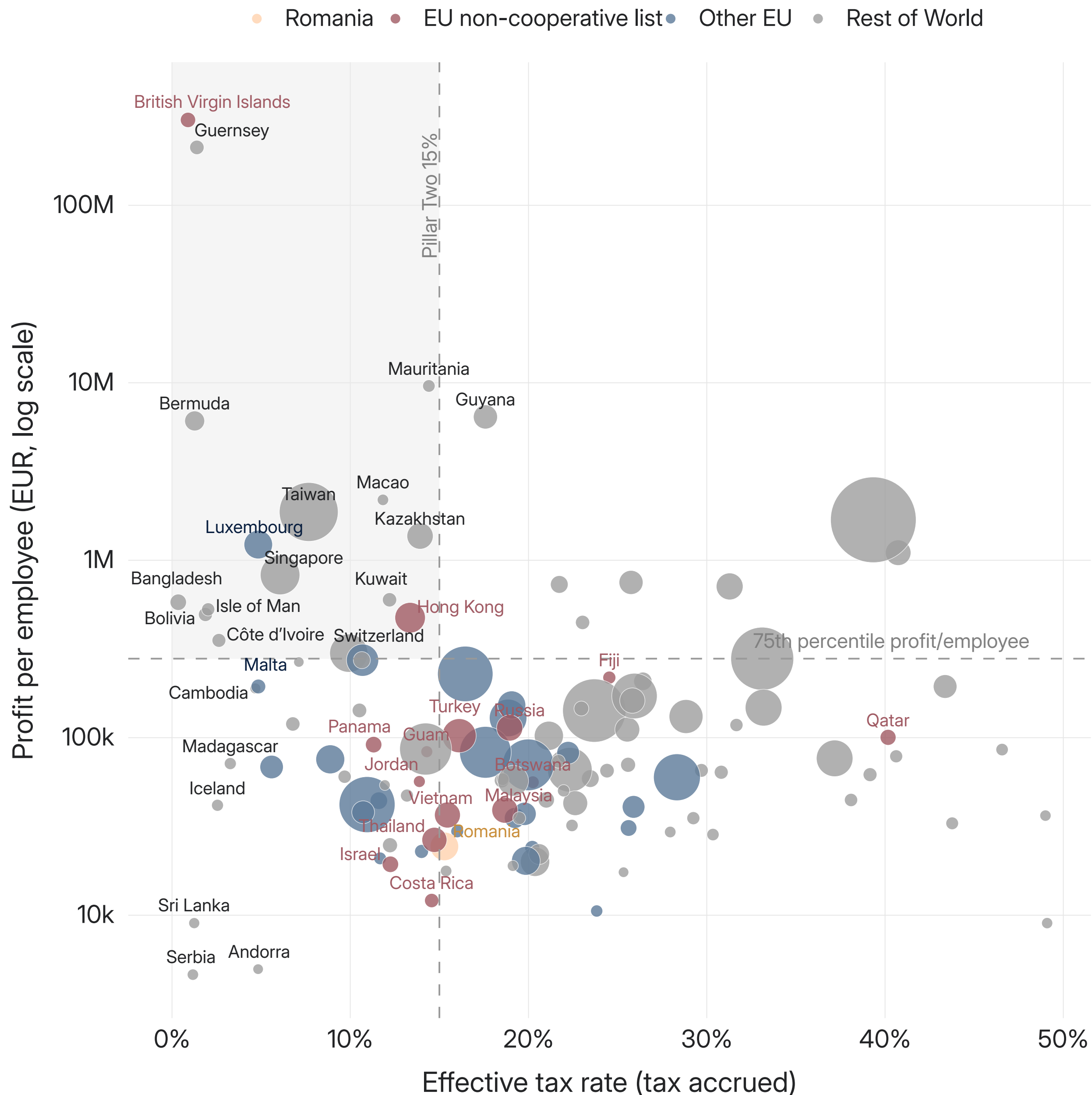
Figure 10 tests whether the non-cooperative list tracks the geography of profit shifting in the Romanian data. For the jurisdictions individually reported, the figure plots two indicators: the effective tax rate (ETR), computed as tax accrued divided by profit before tax, and profit per employee, a measure of how much profit is booked relative to real economic activity. Because the public CbCR aggregates all entities within a jurisdiction, ETRs may be distorted where profitable and loss-making entities co-exist. The "Others" category is excluded, so these estimates characterise only the transparent portion of multinational operations. A jurisdiction with very low taxes and very high profit per employee is a potential profit-shifting destination: profits are concentrated there without a corresponding concentration of workers or activity. The dashed line at 15% marks the OECD/G20 Pillar Two global minimum tax rate, included as a reference point.

Non-cooperative list jurisdictions are scattered across the full ETR range: some, such as Panama (ETR 6%) and the Bahamas (ETR 0%), fall well below 15%, while others, such as Russia (ETR 20%) and Trinidad and Tobago (ETR 28%), report rates above it. Their median ETR is 16%, above the 15% reference.

Inside the shaded profit-shifting risk zone, the non-cooperative list's coverage is uneven. The British Virgin Islands sit at the extreme (ETR 1%, profit per employee exceeding EUR 301 million) and are on the list. Bermuda (ETR 0%, EUR 3.5 million per employee) and Singapore (ETR 8%) show similar patterns but are not listed. Among EU Member States, which fall outside the list's design but are separately disclosed under the Directive, Luxembourg (ETR 2%, EUR 1.1 million per employee), Ireland (ETR 14%), and the Netherlands (ETR 15%) appear in the same region of the chart, consistent with

FIGURE 10

Jurisdictions individually reported in Romanian public CbCR data: effective tax rate vs profit per employee



Note: Each point represents one tax jurisdiction, aggregating all multinationals reporting in that jurisdiction (2023–2024). The horizontal axis shows the effective tax rate (tax accrued divided by profit before tax). The vertical axis shows profit per employee on a log scale. Point size is proportional to total profit before tax. Only jurisdictions with positive aggregate profits and at least two reporting multinationals are shown. The dashed vertical line marks the Pillar Two 15% minimum rate (included as reference; the public CbCR ETR definition differs from the GloBE effective tax rate). The dashed horizontal line marks the 75th percentile of profit per employee.
Source: Public CbCR Database.

prior evidence of profit shifting to these jurisdictions (Tørsløv et al., 2023).

One caveat applies. The Romanian sample is small and self-selected: multinationals engaged in more aggressive tax planning have stronger incentives to limit public disclosure (Sections 3.3.1 and 3.4.3).

FIGURE 11

Effective tax rate vs profit per employee by jurisdiction (OECD aggregated CbCR, 2022)

Note: Each point represents one tax jurisdiction, aggregating across all parent countries reporting to the OECD (2022, profit-making entities only). The horizontal axis shows the effective tax rate (tax accrued divided by profit before tax) and is cropped at 30% to improve visibility of the low-tax, high-profit quadrant; jurisdictions with effective tax rates above this threshold are not displayed. The vertical axis shows profit per employee on a log scale. Point size is proportional to total profit before tax. The dashed vertical line marks the Pillar Two 15% minimum rate. The dashed horizontal line marks the 75th percentile of profit per employee.

Source: OECD Corporate Tax Statistics, 4th edition (2025).

The patterns above are therefore likely conservative. Figure 11 addresses this by replicating the analysis on OECD aggregated CbCR statistics, which draw on the confidential country-by-country reports that all multinationals above the EUR 750 million threshold must file under BEPS Action 13 and are not self-selected.

The same jurisdictions occupy the low-ETR, high-profit-per-employee quadrant at global scale: Bermuda, the British Virgin Islands, Luxembourg, and Ireland at the left edge. Non-cooperative list jurisdictions remain dispersed across the ETR spectrum, not concentrated at the low end. The gap between the list's scope and the jurisdictions where profits concentrate, or where profit shifting may occur, is a structural feature of the data, not an artefact of our sample.

For non-EU-headquartered groups, which dominate the Romanian sample, the non-cooperative list is the principal channel through which non-EU jurisdictions enter separate reporting. As a result, the Directive's coverage is concentrated within the EU, with most non-EU activity absorbed into the residual "Others" category.

Two observations follow. First, the list was designed primarily as an external-screening instrument for tax governance standards; the patterns documented in our data sit only partly within its current scope. Second, the residual category is where most non-EU activity now appears. Within the Directive's existing architecture, reducing this aggregation, and in time moving toward full country-by-country disclosure, would bring more of this activity into view. Laffitte and Montagner (2025) reach the same conclusion from a different angle: exhaustive country-by-country reporting would allow effective tax rates to be measured at jurisdiction level, supplying a quantitative anchor that qualitative compliance tests cannot replicate. Section 5 returns to these implications for the Commission's Article 48h review.

5 Discussion and policy implications

Romania's early adoption of the EU public CbCR Directive provides the first empirical test of a framework that will soon apply across all 27 Member States. The Directive generates public visibility into multinational tax outcomes that did not previously exist: jurisdiction-level data on profits, taxes, and employees are now available for 144 multinationals operating in Romania. The analysis reveals gaps in coverage, completeness, and accessibility that constrain the regime's transparency impact, but also identifies patterns that are structural features of the Directive's design rather than artefacts of Romania's early implementation.

The Directive requires the Commission to submit a review report by June 2027 on compliance with and the impact of the public CbCR obligations.[32] The review must assess in particular whether to extend the obligation to all large undertakings and groups, which would broaden coverage from multinationals above EUR 750 million to large companies generally; whether to expand the content of the report; and the effectiveness of two specific design choices, the aggregated reporting of third-country jurisdictions and the temporary omission of information under the safeguard clause. The Romanian evidence speaks to each of these dimensions.

In parallel, the regime is expanding. EU-parented multinationals enter scope as more Member States transpose the Directive (Gundert et al., 2024), and the machine-readable iXBRL/XHTML format mandated from financial year 2025[33] will resolve format heterogeneity but not the structural issues identi-

[32]Article 48h of Directive 2013/34/EU (as amended). The review takes the OECD context into account and may, where appropriate, be accompanied by a legislative proposal.

[33]Commission Implementing Regulation (EU) 2024/2952, Article 5.

fied here. Public CbCR is also spreading beyond Europe, with Australia's government-platform model (Australian Taxation Office, 2025; Aliprandi, 2024) and growing voluntary adoption of GRI 207 (GRI, 2019; Global Reporting Initiative, 2024). As frameworks multiply, the design choices documented in this note will shape cross-jurisdictional comparability.

Seven areas warrant attention, organised around three priorities.

Priority 1. Expand the scope of disclosure

The Directive's geographical and variable design determines how much the reports actually reveal. Two changes would substantially increase their analytical value.

1. **Reduce the residual aggregation.** 72 multinationals in the restricted sample subsume their parent jurisdiction within the residual category (Section 4.1). Since a multinational's home country typically concentrates a large share of its economic activity, mandating separate disclosure of the ultimate parent entity's jurisdiction would generate substantial analytical value. More broadly, requiring full country-by-country breakdowns would align public disclosure with the jurisdiction-level detail already collected for confidential OECD CbCR filings. A phased approach, starting with parent-jurisdiction disclosure and progressively reducing permissible aggregation, may be more feasible than eliminating the residual category in a single step.
2. **Expand the variable set.** Variable completeness is high (Section 3.4.1), but the Directive's minimum functions as an effective ceiling: only 6 multinationals voluntarily report beyond the six mandated items. The related/unrelated revenue split and tangible assets, already collected in private OECD CbCR filings, would enable analysis of intra-group transactions and mismatches between profits and real economic presence (Delpeuch et al., 2019).

Priority 2. Close the compliance and enforcement gaps

The Romanian data reveal that a substantial share of reports are incomplete, and that many in-scope multinationals have not filed at all. Three reforms would address the underlying causes.

3. **Review the safeguard clause.** Some firms cite Romania's early adoption as a source of competitive disadvantage, but this justification will lose its factual basis once the Directive applies EU-wide from financial year 2025 (Section 3.4.3). Others cite generic commercial sensitivity that is independent of timing and will persist. The Commission review will occur before any deferred information from FY2023 or FY2024 reports becomes mandatorily public, so it must assess the clause based on stated justifications, not deferred content. If safeguard usage persists, the Commission could consider requiring regulatory approval, imposing a substantive threshold for "serious prejudice," or shortening the deferral period.
4. **Address parent non-cooperation.** In 35 reports, the Romanian subsidiary states that the ultimate parent did not provide group-wide data, leaving disclosure limited to Romanian operations (Section 3.4.3). The Directive already allows a non-EU parent to publish the group report itself

and designate one EU subsidiary to file it, but a parent unwilling to disclose will not use this option, and the subsidiary is bound only "to the best of its knowledge and ability."[34] Unless the obligation rests more firmly on the parent, the same pattern can potentially recur across Member States as fragmented single-country filings that cannot be reassembled into a group-level picture. Australia offers one model, placing the publication duty, and the associated penalties, directly on the parent, including foreign-incorporated parents (Appendix A).

5. **Strengthen enforcement.** Romania's legislative framework lacks dedicated penalties for non-compliance with the public CbCR obligation, in contrast to jurisdictions such as Germany and Poland that impose dedicated administrative or criminal sanctions (Section 2). The partial coverage documented in Section 3.3 suggests that this enforcement gap may already be affecting reporting uptake. The wide variation in enforcement regimes across Member States will provide an early test of whether stronger penalties achieve higher compliance rates. A complementary step would be to mandate positive confirmation in the reporting template: firms should be required to state either that nothing has been omitted or precisely what has been withheld. Currently, 75 of 164 reports (46%) omit Section 4 of the template entirely, making it impossible to distinguish legitimate aggregation from silent withholding.

Article 48h also asks the Commission to consider extending the obligation to all large undertakings and groups, which would broaden coverage from multinationals above EUR 750 million to large companies generally. The Romanian evidence is informative on sequencing rather than long-run scope: only an estimated 20% of multinationals already within scope have published a report (Section 3.3.1). Ensuring full compliance among the current population is a more immediate priority than expanding coverage.

Priority 3. Make the data accessible

Even where reports are complete and publicly available, the current infrastructure makes systematic analysis costly.

6. **Establish a centralised repository.** Reports are scattered across company websites in heterogeneous formats and languages (Section 3.2). Any researcher attempting EU-wide analysis will face the same manual extraction process, multiplied by 27 Member States. Across the early-adopting Member States, no central repository for CbCR reports exists (Monaghan and Almond, 2026). Ireland's Companies Registration Office, for instance, maintains a Country-by-Country Document Library where in-scope undertakings may file, but reports are accessible only as individual company documents.[35] An EU-level repository would remove this barrier. The European Single Access Point (ESAP), an EU platform that will centralise corporate financial and sustainability disclosures from July 2027, is the natural candidate. Public CbCR is not yet within its scope, but ESAP's specified machine-readable formats (XHTML with Inline XBRL) match the format that public CbCR reports will use from financial year 2025. The Commission's planned 2029 review of ESAP would be the natural moment to add it.[36] Such a repository would also

[34] Article 48b(6) of Directive 2013/34/EU (as amended).

[35] European Union (Disclosure of Income Tax Information by Certain Undertakings and Branches) Regulations 2023 (S.I. No. 322/2023), Regulation 11.

[36] Regulation (EU) 2023/2859, Article 13 (review clause).

partially mitigate parent non-cooperation: where a non-EU parent does not share group data with its EU subsidiaries, the resulting fragmented per-country filings could at least be retrieved together, allowing a multinational's EU-wide footprint to be reconstructed from its scattered subsidiary disclosures.

7. **Align with parallel frameworks.** Multinationals above the EUR 750 million threshold now prepare multiple versions of jurisdiction-level data, including confidential OECD CbCR filings, EU public CbCR reports, GloBE information returns under Pillar Two, and in some cases Australian public CbCR disclosures. Each uses different variable definitions, aggregation rules, and reporting formats. Greater alignment between the public CbCR template and GloBE profit definitions could reduce duplication and allow public CbCR data to serve as an independent check on the effectiveness of Pillar Two implementation.

Some of these patterns will diminish as the regime matures: safeguard claims tied to early adoption will lose force when the Directive applies EU-wide, and the common template will resolve format heterogeneity. Others are permanent unless the legislative framework is amended: parent non-cooperation from non-EU headquarters, the "Others" aggregation, and the mismatch between the non-cooperative jurisdiction list and profit-shifting geography are all embedded in the current design.

As the Directive comes into full application, the early evidence points in two directions at once. The single-country pattern persists beyond Romania: parent non-cooperation drives single-country filings in Croatia, and Spain's compressed six-month deadline produces the same outcome through a different mechanism (Monaghan and Almond, 2026). At the same time, transparency is widening. More multinationals are entering scope, and some have broadened what they disclose: Microsoft and Procter & Gamble, both limited to Romania-only reports in our sample, published wider multi-jurisdiction reports for a later financial year, with Microsoft's first group-wide report appearing on 30 June 2026 to considerable press attention. The regime is beginning to deliver the public scrutiny it was designed to produce, even as its structural limits remain visible.

The Directive represents a substantial advance in corporate tax transparency. For the first time, jurisdiction-level data on multinational operations are publicly available and independently verifiable, generating disclosure from previously non-transparent firms. The Commission's Article 48h review provides the mechanism to address the structural limitations documented here, drawing on an empirical base that will grow substantially as the Directive becomes effective across all Member States.

Appendix

A Other public disclosures

Public country-by-country reporting is not limited to the European Union. Other jurisdictions and voluntary frameworks also require or encourage similar disclosures of jurisdiction-level tax and economic information by multinational enterprises. This appendix briefly surveys the most prominent ones.

Australia

Australia has adopted a public CbCR regime administered by the Australian Taxation Office (ATO), applying to reporting periods beginning on or after 1 July 2024. Unlike the EU framework, which relies on company-level publication, the Australian regime envisages government-platform publication: the ATO collects the data and publishes it centrally. The regime covers multinational groups with global consolidated income of at least AUD 1 billion and Australian-sourced income of at least AUD 10 million. By publishing through an official government platform, the Australian model addresses some of the accessibility challenges observed in the EU context, where reports are scattered across national registries and company websites. The two regimes also differ in who is legally liable for publication. The EU cascades the obligation onto the EU subsidiary or branch when the ultimate parent is foreign, attaching personal liability to subsidiary directors "to the best of their knowledge and ability". Australia places the obligation directly on the parent, with administrative penalties applying to the parent itself, potentially avoiding the parent non-cooperation pattern observed in the Romanian sample (Section 3.4.3).

United States

The United States does not have a mandatory public CbCR regime. Legislative proposals for public country-by-country reporting have been introduced in Congress (United States Congress, 2021) but have not advanced to enactment. However, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update 2023-09 on income tax disclosures (Topic 740), effective for public business entities for annual periods beginning after 15 December 2024 (Financial Accounting Standards Board, 2023). This update requires disaggregated disclosure of income taxes paid by jurisdiction and an expanded rate reconciliation, substantially increasing the amount of tax-related information available to investors in US financial statements. While not equivalent to a full CbCR regime, the FASB update represents a significant expansion of mandatory tax transparency in the world's largest capital market.

GRI 207: Tax

The Global Reporting Initiative's Tax Standard (GRI 207), published in 2019, establishes a voluntary framework for public country-by-country tax reporting. GRI 207 requires disclosing entities to report revenues, profit before tax, income tax paid, income tax accrued, number of employees, and tangible assets (other than cash and cash equivalents) for each tax jurisdiction, alongside qualitative information on tax governance and strategy (GRI, 2019). The standard has been adopted by a growing number of multinational companies, particularly those subject to investor and civil society pressure on tax transparency (Global Reporting Initiative, 2024). GRI 207 overlaps substantially with the EU public CbCR template in its quantitative requirements, but goes further by requiring narrative disclosures on tax strategy, stakeholder engagement, and country-by-country explanations of differences between statutory and effective tax rates. The interaction between voluntary GRI 207 adoption and mandatory EU public CbCR obligations will be an important area to monitor as the Directive takes effect across Member States.

Table A.1 compares the required variables across the five frameworks discussed in this appendix: the EU Directive, the OECD CbCR template, GRI 207, Australia's public CbCR regime, and the FASB income tax disclosure standard.

TABLE A.1

Required variables across different reporting standards

Variable	EU Directive	OECD	GRI 207	Australia	FASB
Revenues from third-party sales		✓	✓	✓	
Revenues from intra-group transactions		✓	✓	✓	
Total Revenues	✓	✓	✓	✓	
Profit/loss before tax	✓	✓	✓	✓	
Tangible assets		✓	✓	✓	
Number of employees	✓	✓	✓	✓	
Corporate income tax paid	✓	✓	✓	✓	✓
Corporate income tax accrued	✓	✓	✓	✓	
Stated Capital		✓			
Accumulated earnings	✓	✓			
Rate reconciliation			✓		✓
Tax strategy narrative			✓	✓	
Geographical scope					
Full jurisdiction-by-jurisdiction	(✓)	✓	✓	(✓)	(✓)

Note: A checkmark indicates that the variable is required. Parentheses indicate partial coverage. EU Directive: Directive (EU) 2021/2101; separate rows for EU Member States and non-cooperative jurisdictions, aggregation permitted for all others. OECD: OECD/G20 BEPS Action 13 CbCR template; full jurisdiction-by-jurisdiction. GRI 207: Global Reporting Initiative Tax Standard (2019); full jurisdiction-by-jurisdiction. Australia: Public CbCR regime administered by the ATO (from 1 July 2024); separate reporting for Australia and 40 specified countries, aggregation for the rest. FASB: ASU 2023-09 (Topic 740), effective from annual periods beginning after 15 December 2024; requires jurisdiction-level disaggregation of income taxes paid above a 5% threshold and an expanded rate reconciliation, but does not require revenue, profit, or employee data by jurisdiction.
Source: Own elaboration.

B EU list of non-cooperative jurisdictions

Tables B.1 and B.2 summarise the evolution of the EU list of non-cooperative jurisdictions for tax purposes from February 2022 to October 2025, covering all Council updates relevant to the financial year 2023 and 2024 reports analysed in this note. The list comprises two tiers. The "blacklist" (formally Annex I) identifies jurisdictions that do not meet the EU's tax good-governance criteria and have failed to cooperate or implement agreed reforms. The "grey list" (formally Annex II) covers jurisdictions that cooperate with the EU and have made commitments to address identified deficiencies, but where implementation is still pending. The Council reviews and revises both annexes twice a year, customarily in February and October. Over this period, the blacklist remains relatively stable, whereas the grey list is more dynamic, reflecting jurisdictions' progress in fulfilling their commitments.

The two annexes trigger different disclosure obligations under Article 48c(5) of Directive 2013/34/EU (as amended). Blacklisted jurisdictions trigger separate reporting whenever they appear on Annex I on 1 March of the financial year covered by the report. Grey-listed jurisdictions trigger separate reporting only if they have been on the list for at least two consecutive years, that is, on 1 March of both the financial year covered by the report and the preceding financial year. The Council updates that determine which jurisdictions trigger separate disclosure for the reports analysed in this note are therefore the 24 February 2022 list (the relevant prior-year list for financial year 2023), the 14 February 2023 list (relevant for financial year 2023, and as the prior-year list for financial year 2024), and the 20 February 2024 list (relevant for financial year 2024).

TABLE B.1

EU non-cooperative jurisdictions ("blacklist"): inclusion across Council updates

Jurisdiction	Feb 2022	Oct 2022	Feb 2023	Oct 2023	Feb 2024	Oct 2024	Feb 2025	Oct 2025
American Samoa	✓	✓	✓	✓	✓	✓	✓	✓
Fiji	✓	✓	✓	✓	✓	✓	✓	✓
Guam	✓	✓	✓	✓	✓	✓	✓	✓
Palau	✓	✓	✓	✓	✓	✓	✓	✓
Panama	✓	✓	✓	✓	✓	✓	✓	✓
Samoa	✓	✓	✓	✓	✓	✓	✓	✓
Trinidad and Tobago	✓	✓	✓	✓	✓	✓	✓	✓
US Virgin Islands	✓	✓	✓	✓	✓	✓	✓	✓
Vanuatu	✓	✓	✓	✓	✓	✓	✓	✓
Anguilla		✓	✓	✓	✓	✓	✓	✓
Russian Federation			✓	✓	✓	✓	✓	✓
Bahamas		✓	✓	✓				
Turks and Caicos Islands		✓	✓	✓				
Antigua and Barbuda				✓	✓			
Belize				✓				
British Virgin Islands			✓					
Costa Rica			✓					
Marshall Islands			✓					
Seychelles				✓				

Note: A tick mark indicates that the jurisdiction was blacklisted (Annex I of the EU list of non-cooperative jurisdictions for tax purposes) at the relevant Council update. Blacklisted jurisdictions have failed to meet EU tax good-governance criteria or did not deliver on agreed commitments within the prescribed deadlines. Under Article 48c(5) of Directive 2013/34/EU (as amended), reports must disclose Annex I jurisdictions separately if they were listed on 1 March of the financial year for which the report is drawn up.
Source: Council of the European Union, ECOFIN conclusions of 24 February 2022, 4 October 2022, 14 February 2023, 17 October 2023, 20 February 2024, 8 October 2024, 18 February 2025, and 10 October 2025 (Official Journal of the European Union, series C).

TABLE B.2

EU non-cooperative jurisdictions (“grey list”): inclusion across Council updates

Jurisdiction	Feb 2022	Oct 2022	Feb 2023	Oct 2023	Feb 2024	Oct 2024	Feb 2025	Oct 2025
Turkiye	✓	✓	✓	✓	✓	✓	✓	✓
Belize	✓	✓	✓		✓	✓	✓	✓
British Virgin Islands	✓	✓		✓	✓	✓	✓	✓
Eswatini		✓	✓	✓	✓	✓	✓	✓
Seychelles	✓	✓	✓		✓	✓	✓	✓
Viet Nam	✓	✓	✓	✓	✓	✓	✓	
Costa Rica	✓	✓		✓	✓	✓		
Malaysia	✓	✓	✓	✓	✓			
Armenia		✓	✓	✓	✓			
Botswana	✓	✓	✓	✓				
Curacao			✓	✓	✓	✓		
Dominica	✓	✓	✓	✓				
Hong Kong	✓	✓	✓	✓				
Israel	✓	✓	✓	✓				
Jordan	✓	✓	✓					✓
Antigua and Barbuda						✓	✓	✓
Montserrat	✓	✓	✓					
Qatar	✓	✓	✓					
Thailand	✓	✓	✓					
Albania			✓	✓				
Aruba			✓	✓				
Barbados	✓	✓						
Brunei Darussalam							✓	✓
Jamaica	✓	✓						
North Macedonia	✓	✓						
Russian Federation	✓	✓						
Uruguay	✓	✓						
Anguilla	✓							
Bahamas	✓							
Bermuda	✓							
Greenland								✓
Montenegro								✓
Morocco								✓
Tunisia	✓							
Turks and Caicos Islands	✓							

Note: A tick mark indicates that the jurisdiction was grey-listed (Annex II of the EU list of non-cooperative jurisdictions for tax purposes) at the relevant Council update. Grey-listed jurisdictions have made formal commitments to address identified deficiencies in tax transparency or fair taxation but had not yet fully implemented them at the reference date. Under Article 48c(5) of Directive 2013/34/EU (as amended), reports must disclose a grey-listed jurisdiction separately only if it has been on the list for at least two consecutive years (specifically, on 1 March of both the financial year covered by the report and the preceding financial year).

Source: Council of the European Union, ECOFIN conclusions of 24 February 2022, 4 October 2022, 14 February 2023, 17 October 2023, 20 February 2024, 8 October 2024, 18 February 2025, and 10 October 2025 (Official Journal of the European Union, series C).

C Scoring framework for EU Public CbCR implementation

Table C.1 presents the scoring framework used to compare national implementations of the EU Public CbCR Directive across Member States (Figure 2). Each of the six dimensions captures a policy choice where Member States exercise discretion under the Directive. Scores are assigned on a 1–3 scale based on transposition laws, secondary legislation, and implementation guidance as documented in the KPMG and PwC trackers and verified against national legal texts. For penalties, borderline cases are classified as weak (Score 1): only regimes with unambiguous, high-value statutory penalties qualify for moderate or strong scores.

TABLE C.1

Scoring framework for Public CbCR implementation characteristics

Characteristic	Scale definition	Score 1 (Minimum)	Score 2 (Intermediate)	Score 3 (Strong)
1. Early adoption (FY Start)	Timing relative to the mandated deadline (June 22, 2024).	FY $\geq$ June 22, 2024 (Standard)	FY $\geq$ Jan 1, 2024 (Early)	FY $\geq$ Jan 1, 2023 (Earliest)
2. Publication deadline	Time to publish report after FY end (Directive minimum: 12 months).	12 months (Standard)	7–11 months	$\leq$6 months (Shortest)
3. Safeguard clause	Degree of immediate disclosure (clause allows 5-year deferral of sensitive data).	Clause adopted (least transparent)	Clause adopted with shorter period	Clause not adopted (full transparency)
4. Mandatory Website publication	Accessibility of the report.	Exemption adopted (lower accessibility)	N/A	Exemption not adopted (highest accessibility)
5. Broader scope	Extent of jurisdictions requiring disaggregated reporting.	No extension (minimum scope)	EEA countries (Iceland, Liechtenstein and Norway)	Extended tax haven list
6. Penalties	Enforcement mechanism for non-compliance.	No specific penalty, penalties "not specified" or "TBC," or only nominal fines unlikely to deter large multinationals	Specified fines targeting directors or responsible persons, with maximum amounts up to EUR 100,000 (e.g., Italy, Greece)	Fines of EUR 100,000 or more, escalating or cumulative penalty structures, percentage-of-assets penalties, or imprisonment for non-compliance (e.g., Germany, the Netherlands, Poland)

Note: This scoring system translates the Directive's minimum standards and Member State policy choices into a 1–3 scale, where 1 represents the weakest level of transparency or enforcement and 3 represents the strongest level of disclosure, accessibility, or deterrence.
Source: National transposition legislation, PwC EU CbCR Directive Tracker (2025), KPMG (2025), own calculations.

D Booking Holdings: Additional report sections

The following figures illustrate sections 1, 3, and 4 of the Booking Holdings Inc. public CbCR report (FY2023). The country-by-country table (section 2) is presented in Figure 3 in the main text.

FIGURE D.1

Public CbCR example, Section 1: General information (Booking Holdings)

Section 1 – General information

Name of the ultimate parent of the group / of the standalone undertaking	Booking Holdings Inc.
Country where the ultimate parent has its registered office	US
Financial Year – start date	2023-01-01
Financial Year – end date	2023-12-31
Reporting currency	USD
Is the information in the report based on reporting instructions used for tax purposes, pursuant to Section III, Parts B and C, of Annex III to Council Directive 2011/16/EU (yes/no)?	No

Note: This figure shows Section 1 of Booking Holdings' public CbCR report: general information including the ultimate parent entity, jurisdiction, financial year, and reporting currency.
Source: Booking.com

FIGURE D.2

Public CbCR example, Section 3: List of subsidiaries by jurisdiction (Booking Holdings)

Section 3 – List of subsidiaries and activities

Member State or tax jurisdiction	Country code	Name of each subsidiary undertaking in the Member State or tax jurisdiction	Brief description of the nature of activities in the Member State or tax jurisdiction
Austria	AU	Booking.com (Österreich) GmbH	Administrative, Management or Support Services
Belgium	BE	Booking.com (Belgium) BVBA	Administrative, Management or Support Services
Bulgaria	BG	BOOKING.COM (BULGARIA) EOOD	Administrative, Management or Support Services
Croatia	HR	Booking.com D.O.O	Administrative, Management or Support Services

Note: This figure shows Section 3 of Booking Holdings' public CbCR report: the list of constituent entities by jurisdiction with a description of the nature of activities.
Source: Booking.com

FIGURE D.3

Public CbCR example, Section 4: Omitted information and safeguard clause (Booking Holdings)

Section 4: Omitted information

Information omitted (if any) for this financial year:	Not applicable
Information omitted in previous financial years, which is disclosed in this financial year (if any):	Not applicable

Note: This figure shows Section 4 of Booking Holdings' public CbCR report: disclosures on omitted information and the safeguard clause. In this case, no information was omitted.
Source: Booking.com

E Taxplorer

The dataset underlying this note is publicly accessible through Taxplorer (https://www.taxplorer.eu), an interactive platform for exploring public CbCR data. Taxplorer allows users to search by multinational, jurisdiction, or variable, and to compare disclosures across firms and reporting years. The platform was developed in collaboration with Data for Good, a non-profit organisation mobilising volunteer engineers for public-interest projects.

F Fair Tax Foundation sample comparison

The Fair Tax Foundation independently tracks public CbCR filings across jurisdictions. Table F.1 compares their October 2025 count of Romanian filings against our dataset, broken down by headquarters country. The two collections show broadly comparable coverage, providing independent validation of the sample's completeness. Differences reflect classification choices (directive-driven vs. voluntary) and timing of data collection.

TABLE F.1

Comparison with Fair Tax Foundation data collection

Headquarters country	Directive reports	Directive and voluntary	Fair Tax Foundation
United States of America	72	72	62
Switzerland	21	22	16
Japan	18	18	17
United Kingdom	18	23	18
Canada	6	6	2
China	4	4	6
Denmark	3	6	2
Cayman Islands	2	2	2
India	2	2	2
Mexico	2	3	1
Netherlands	2	15	2
Romania	2	2	2
Azerbaijan	1	1	1
Bermuda	1	1	1
Brazil	1	1	1
France	1	2	4
Hong Kong	1	1	1
Kazakhstan	1	1	1
Luxembourg	1	1	0
Russia	1	1	1
Singapore	1	1	1
South Africa	1	1	1
South Korea	1	1	2
Turkey	1	1	2
Germany	0	1	1
Greece	0	1	0
Italy	0	7	0
Norway	0	1	0
Spain	0	6	1
British Virgin Islands	0	0	1
United Arab Emirates	0	0	1
Total	164	204	152

Note: The table reports Fair Tax Foundation counts as of October 2025. Link to the source information on the Fair Tax Foundation website.

Source: Public CbCR Database; Fair Tax Foundation (2025).

G Subsidiary size thresholds and OECD comparison

Romanian subsidiaries are in scope if they qualify as "medium-sized or large" for two consecutive years, determined by exceeding two of three criteria: balance sheet total, net turnover, and number of employees (Section 2.1). The relevant thresholds are: net turnover RON 35M (FY2023) / RON 50M (FY2024), balance sheet total RON 17.5M (FY2023) / RON 25M (FY2024), and 50 employees (both periods). All monetary values are converted to EUR at 4.95 RON/EUR.

Figures G.1 through G.3 test whether the subsidiary size threshold is a binding constraint on coverage by comparing these thresholds against OECD aggregated CbCR statistics (2022) and individual observations from our sample. Only non-EU headquartered multinationals are shown, as these are the groups currently in scope. In the charts, gray bars show the OECD average per multinational; gray diamonds mark the OECD interquartile mean (where available); gold dots are individual sample observations; and dark blue crosses are implied averages of non-reporting multinationals.[37]

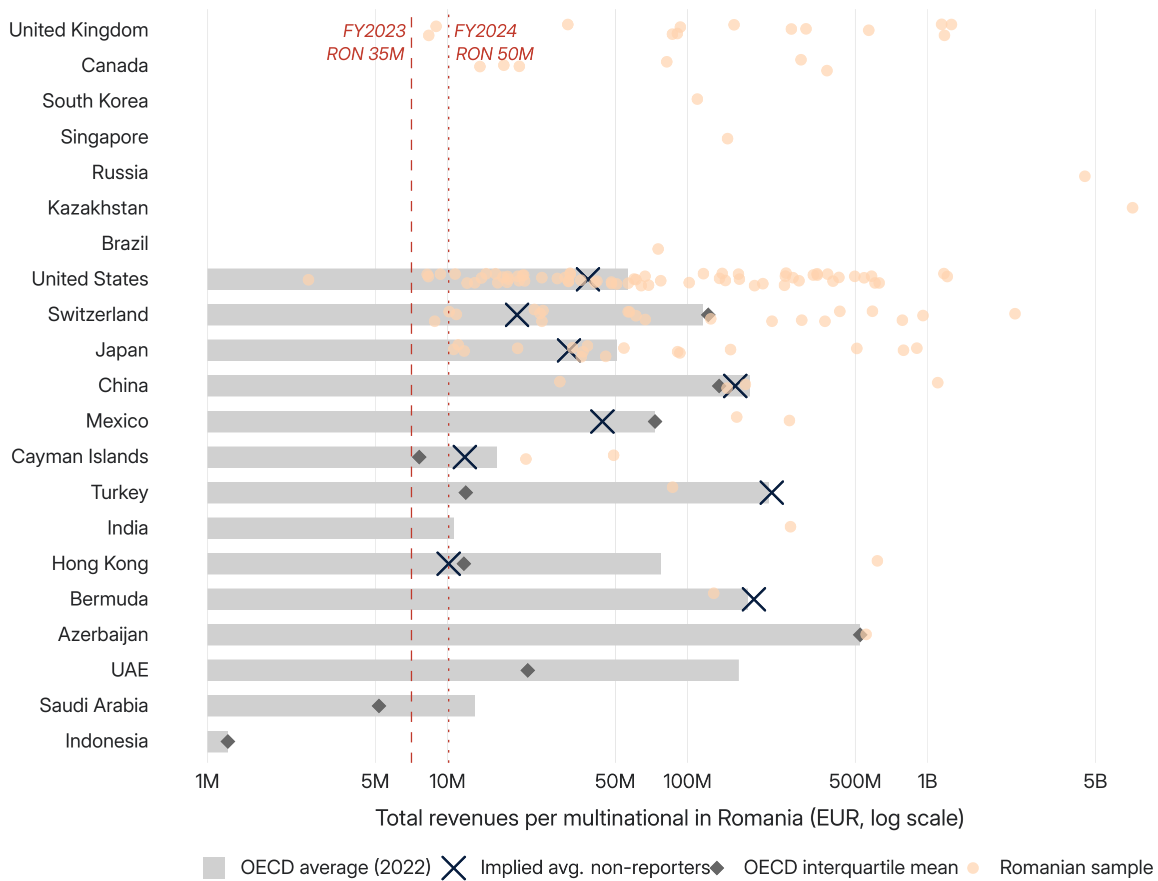
Implied average of non-reporters. For parent countries where both OECD totals and our sample are available, we estimate the average of non-reporting multinationals: (OECD total − sample total) / (OECD count − sample count). For the United States, 253 multinationals do not appear in the sample; their implied average revenue is EUR 38.4 million with 204 employees, well above both thresholds. The implied averages exceed thresholds for every country where the calculation is feasible. For Switzerland and India, sample totals exceed the OECD aggregates (likely reflecting 2022–2023 growth), so the calculation is not possible. The OECD data also reports 11 multinationals in 3 non-EU countries (ARE, IDN, SAU) with zero public CbCR reports; their OECD averages also exceed the thresholds.

Limitations. The OECD data covers 2022; the Romanian sample covers FY2023–2024. However, OECD per-multinational averages trend upward across 2016–2022 (median year-over-year change: +12% for revenue, +3% for employees), making the comparison conservative. Where available, OECD interquartile means (trimming the top and bottom quartiles) remain well above thresholds despite being substantially below simple averages. The OECD reports country-level aggregates, not subsidiary-level data, so the "average per multinational" may conceal variation across subsidiaries within a group.

[37] Variable definitions are approximately comparable. Both the OECD and public CbCR revenue measures capture total revenues inclusive of intra-group transactions, though the Romanian threshold uses "net turnover" per OMFP 1802/2014. For assets, the OECD reports tangible assets (excluding cash), a subset of the total balance sheet; multinationals exceeding this lower bound certainly meet the full criterion. OECD figures converted from USD at ECB 2022 annual average rate (1 EUR = 1.053 USD).

FIGURE G.1

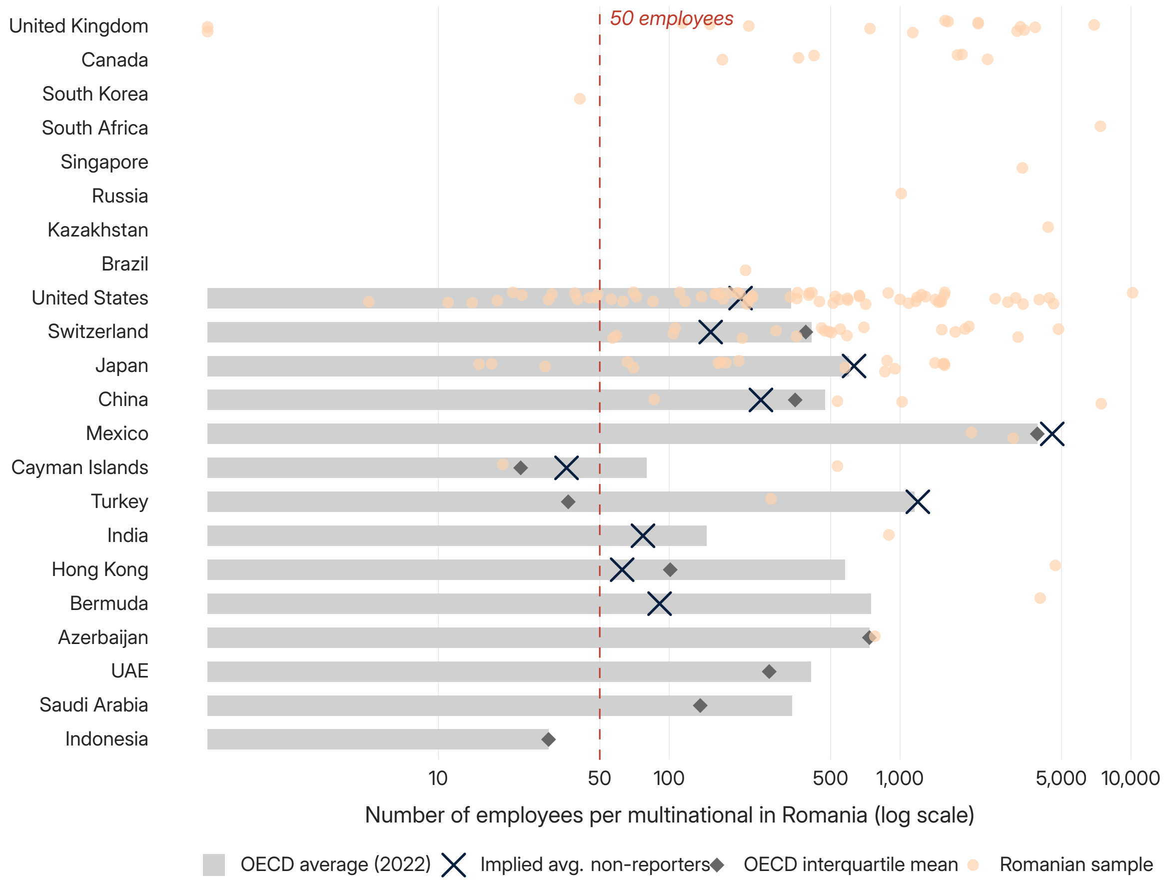
Revenue per multinational in Romania vs. subsidiary size thresholds



Note: Gray bars: OECD average total revenue per multinational in Romania (2022, Panel A), computed as total revenue divided by number of groups. Gray diamonds: OECD interquartile mean (trimmed mean of the per-multinational distribution, excluding top and bottom quartiles; not available for all countries). Gold dots: individual Romanian public CbCR observations (FY2023–2024). Dark blue crosses: implied average revenue of non-reporting multinationals, computed as (OECD aggregate − sample total) / (OECD count − sample count); shown only where both residuals are positive. Dashed red line: FY2023 net turnover threshold (RON 35M ≈ EUR 7.1M). Dotted red line: FY2024 threshold (RON 50M ≈ EUR 10.1M). Countries at the bottom have OECD-reported multinationals in Romania but no public CbCR reports in the sample. Only non-EU headquarters countries are shown (EU-headquartered groups are not yet in scope under Romania's phased implementation). All monetary values in EUR (OECD data converted from USD at ECB 2022 annual average rate).
Source: OECD CbCR Table 1 and Interquantile Statistics (2025 edition), Public CbCR Database.

FIGURE G.2

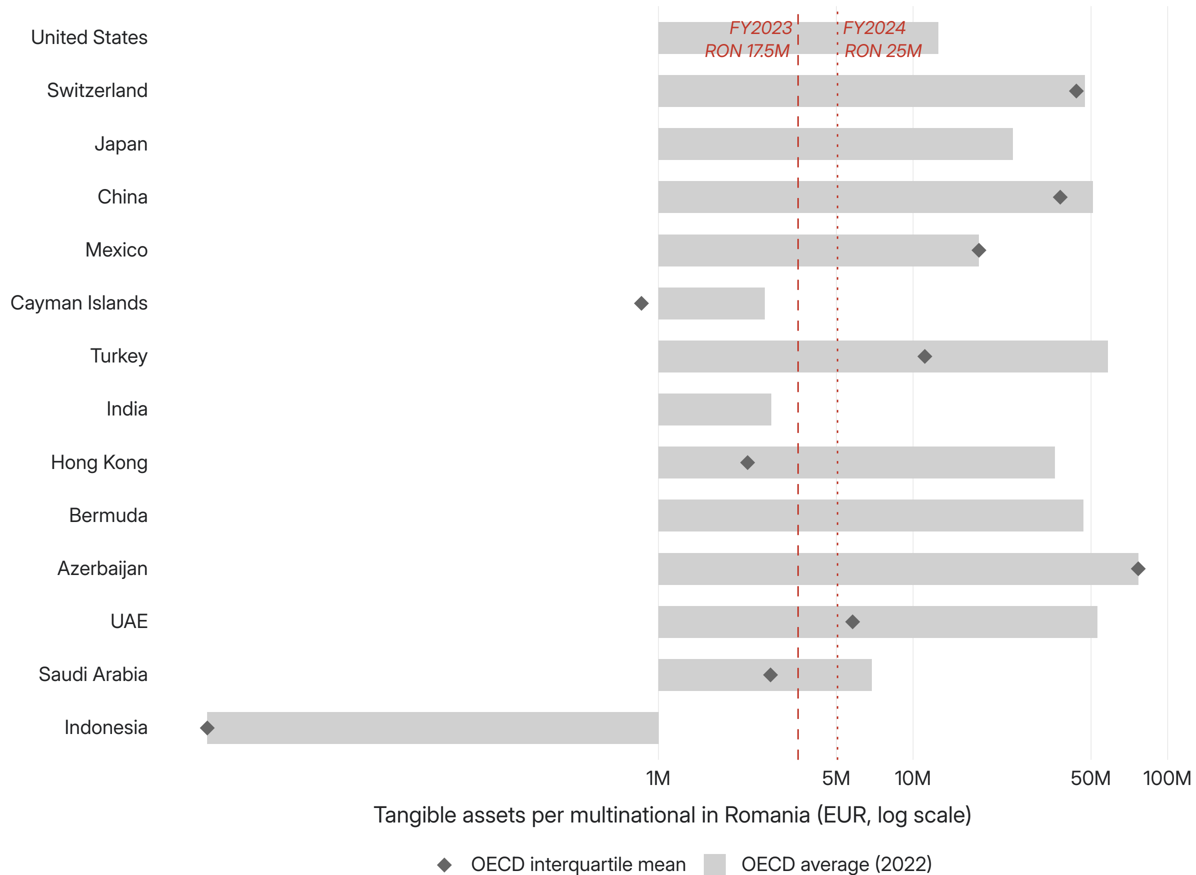
Employees per multinational in Romania vs. subsidiary size threshold



Note: Gray bars: OECD average employees per multinational in Romania (2022, Panel A). Gray diamonds: OECD interquartile mean (not available for all countries). Gold dots: individual Romanian public CbCR observations (FY2023–2024). Dark blue crosses: implied average employees of non-reporting multinationals (see Figure G.1 note for formula). Dashed red line: 50-employee threshold. Countries at the bottom have OECD-reported multinationals in Romania but no public CbCR reports. Only non-EU headquarters countries are shown.
Source: OECD CbCR Table 1 and Interquantile Statistics (2025 edition), Public CbCR Database.

FIGURE G.3

Tangible assets per multinational in Romania vs. subsidiary size thresholds



Note: Gray bars: OECD average tangible assets (other than cash and cash equivalents) per multinational in Romania (2022, Panel A). Gray diamonds: OECD interquartile mean (not available for all countries). Dashed and dotted red lines: FY2023 and FY2024 balance sheet total thresholds (RON 17.5M and RON 25M). Since tangible assets are a subset of total assets, these thresholds represent a lower bound: multinationals above the line certainly exceed the balance sheet criterion. No individual sample observations are shown (public CbCR reports do not include a balance sheet variable). Countries at the bottom have OECD-reported multinationals in Romania but no public CbCR reports. Only non-EU headquarters countries are shown. All monetary values in EUR (OECD data converted from USD at ECB 2022 annual average rate).
Source: OECD CbCR Table 1 and Interquantile Statistics (2025 edition).

Only 3 out of 147 observations in the Romanian sample report revenue below the FY2023 threshold, and 23 report fewer than 50 employees. OECD country averages and implied non-reporter averages exceed both thresholds for all parent jurisdictions where the calculation is feasible. The subsidiary size threshold is not a binding constraint on coverage; the gap between OECD-expected and actual reporters reflects enforcement and compliance factors rather than scope limitations.

H Safeguard clause and omitted information: illustrative examples

This appendix provides excerpts from CbCR reports illustrating each category of the omitted information analysis (Section 3.4.3). Romanian-language excerpts are presented in English translation by the authors.

Safeguard clause invoked

Amgen (FY2023): jurisdiction-level omission, competitive disadvantage.

> *"The Romanian Ministry of Finance issued Order No. 2048 of 2022 [...] However, Amgen's subsidiaries in Romania consider that [...] reporting data for the omitted jurisdictions would place Amgen at a commercial disadvantage relative to its competitors."*

Reports data for Romania and EU non-cooperative list jurisdictions only; omits all other jurisdictions. Commits to future disclosure.

Colgate-Palmolive (FY2023): variable-level omission.

> *"As provided by regulations [...] we have opted to temporarily omit the revenue data from this report. [...] Many of its direct competitors are not present or are privately held in Romania and therefore not subject to these regulations."*

Reports all jurisdictions but omits the revenue variable. All tax-related variables disclosed.

Lockheed Martin (FY2024): competitive sensitivity.

> *"Disclosure of certain financial and operational details, such as income tax accrued and accumulated earnings, could expose sensitive business data and create competitive risks. To mitigate these risks, we applied the Safeguard clause."*

Reports only Romania. The preamble also states that the Romanian subsidiary requested data from the parent but did not receive it, making this a dual justification case: safeguard clause invocation combined with parent non-cooperation.

International Distribution Services (FY2023): total withholding.

> *"Immediate disclosure of jurisdictional specific information will be seriously prejudicial to the commercial position of IDS/GLS [...] In the logistics sector, competitors could use such data to replicate successful market strategies or adjust pricing."*

Withholds all jurisdiction-level and variable-level data, producing a minimal report. IDS/GLS operates in the logistics sector, headquartered in the United Kingdom.

Parent did not provide data

PepsiCo (FY2024): US-headquartered, explicit refusal.

> *"Quadrant-Amroq Beverages S.R.L. and S.C. Star Foods E.M. S.R.L. ('the subsidiaries') requested the global data from the ultimate parent entity, PepsiCo Inc. However, PepsiCo Inc. did not make this information available to the subsidiaries."*

IBM (FY2023): US-headquartered.

> *"The data and information are limited to the operations of the IBM group in Romania, as the Group's ultimate parent company, IBM Corporation, has not made available the Group's worldwide operations data to IBM Romania SrL."*

Mondelez (FY2023): data access limitations.

> *"Information for other countries is not included in this report due to limitations in access to data accessible to subsidiaries in Romania at the time of reporting."*

SGS (FY2023 and FY2024): footnote disclosure. SGS filed Romania-only reports for both financial years. Neither report contains a formal Section 4 heading, but a footnote at the end of each document states that the subsidiary requested group-wide data from SGS Group SA (Switzerland) and did not receive it. The parent refusal is disclosed in the least visible part of the document.

No explanation provided

Holcim (FY2023): Romania-only, no Section 4. Holcim Romania filed a Romania-only report using the standard R404 regulatory format. No Section 4 is present, and no text anywhere in the document explains why data for other jurisdictions is absent. Holcim Ltd is headquartered in Switzerland.

I CbCR Example: Apple

Apple Inc.'s Romanian subsidiary published only aggregated figures for its Romanian operations, stating that the ultimate parent entity did not make group-wide data available. Figure I.1 shows the resulting disclosure, representative of the "parent data refusal" pattern described in Section 3.4.3.

FIGURE I.1

Public CbCR report: Apple Inc. (FY2024)

Romania Public Country by Country Report
Raportul public pe ţări pentru România

The following information, which is provided pursuant to Romanian Order Numbers 2048/2022 and 1.730/2023, is limited to the Group's Romanian operations, as the Group's ultimate parent has not made available information with respect to the Group's worldwide operations.

Următoarele informații, furnizate în conformitate cu Ordinul nr. 2048/2022 și 1.730/2023 din România, se limitează la operațiunile Grupului din România, deoarece societatea-mamă a Grupului nu a pus la dispoziție informații cu privire la operațiunile Grupului la nivel mondial.

Section 1. General information **Secţiunea 1. Informaţii generale**	
Name of the group Denumirea grupului	Apple
Name of the ultimate parent of the group Denumirea societatii mama finala din cadrul grupului	Apple Inc.
Country where the ultimate parent has its registered office Tara in care societatea mama finala este inregistrata	United States of America / Statele Unite ale Americii
Tax Identification Number (IN) of ultimate parent Numarul de identificare fiscala al societatii mama finala	94-2404110
Financial year - start date An fiscal - data de inceput	01 October 2023 / 01 octombrie 2023
Financial year - end date An fiscal - data de final	28 September 2024 / 28 septembrie 2024
Reporting currency Moneda	USD
Is the information in the report based on reporting instructions used for tax purposes, pursuant to Section III, Parts B and C, of Annex III to Council Directive 2011/16/EU (yes/no)? Sunt informatiile din raportare bazate pe instructiunile de raportare utilizate pentru scopuri fiscale, in linie cu Sectiunea III, partile B si C din Anexa III la Directiva Consilului 2011/15/EU (da/nu)?	Yes / Da

Section 2. Overview of allocation of elements on a country-by-country basis **Secţiunea 2. Prezentarea generală a informaţiilor pentru fiecare ţară în parte**							
Tax jurisdiction	Country code	Revenues	Profit (loss) before income tax	Income tax paid - on cash basis	Income Tax accrued - current year	Accumulated earnings	Number of employees
Jurisdictie fiscala	Cod de ţară	Venituri	Profit (pierdere) brută	Impozitul pe profit plătit în numerar	Impozitul pe venit acumulat în cursul exercițiului financiar în cauză	Castiguri acumulate	Numar de salariați
Romania România	RO	71,903,280	31,685,343	4,733,105	5,319,013	21,332,583	23

Section 3 - List of subsidiaries and activities **Sectiunea 3 - Lista subsidiarelor și a activităților**			
Member state of tax jurisdiction	Country code	Name of each subsidiary undertaking in the Member State or tax jurisdiction	Brief description of activity
Stat membru sau jurisdictie fiscala	Cod de ţară	Numele fiecarei subsidiare din statul membru sau jurisdictia fiscala	Descrierea activitatii
Romania România	RO	Apple Distribution International Limited - IE PE [RO]; Apple Sales Romania S.R.L.	Sales, Marketing, or Distribution

Source: Apple Inc.

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