

6. Documents required

Form No. 56

The following information/document in relation to the international group would be required for filing Form No. 56:

- Name and address of the international group of which the assessee is a constituent entity
- List of all constituent entities of the international group along with their addresses, and PANs of those constituent entities operating in India
- Chart depicting the legal status of the constituent entity, and ownership structure of the entire international group
- Written description of the business of the international group during the accounting year in accordance with Rule 123(1)(C) containing the following, namely: —

(i) the nature of the business or businesses;

(ii) the important drivers of profits of such business or businesses;

(iii) a description of the supply chain for the five largest products or services of the international group in terms of revenue, and any other products including services amounting to more than five per cent of the consolidated group revenue;

(iv) a list and brief description of important service arrangements made among members of the international group, other than those for research and development services;

(v) a description of the capabilities of the main service providers within the international group;

(vi) the transfer pricing policies for allocating service costs, and determining prices to be paid for intra-group services;

(vii) a list and description of the major geographical markets for the products and services offered by the international group;

(viii) the functions, assets and risks analysis of the constituent entities of the international group, that contribute at least ten per cent of the revenues or assets or profits of such group; and

(ix) a description of the important business restructuring transactions, acquisitions and divestments

- Description of the overall strategy of the international group for the development, ownership and exploitation of intangible property, including location of principal research and development facilities and their management

- List and brief description of important agreements among members of the international group related to intangible property, including cost contribution arrangements, principal research service agreements and license agreements
- Description of the transfer pricing policies of the international group related to research and development and intangible property
- Description of important transfers of interest in intangible property, if any, among entities of the international group, including the names and addresses of the selling and buying entities and the compensation paid for such transfers
- Detailed description of the financing arrangements of the international group, including the names and addresses of the top ten unrelated lenders
- List of group entities that provide central financing functions, including their addresses of operation and of effective management
- Detailed description of the transfer pricing policies of the international group related to financing arrangements among group entities
- A copy of the annual consolidated financial statement of the international group
- A list and brief description of the existing unilateral advance pricing agreements and other tax rulings in respect of the international group for allocation of income among countries

Form No. 57

The following information/document in relation to the international group would be required for filing Form No. 57:

- Details of the designated constituent entity
- Name of the international group and details of the parent entity of the international group

Form No. 58

The following information/document in relation to the international group would be required for filing Form No. 58:

- Details of the constituent entity, resident in India, filing the form
- Details of the international group
- Details of the alternate reporting entity, if any, designated by the international group

Form No. 59

The following information/document in relation to the international group would be required for filing Form No. 59:

- Consolidated financial statement of the international group
- Jurisdiction-wise financial and operational information
- Constituent entity-wise financial and operational information of all constituent entities of the international group

Form No. 60

Details of the international group, details of the parent entity of the international group, details (Name, Address, PAN) of the constituent entity designated to furnish the report under section 511(4), and details (Name, Address, PAN) of all other constituent entities of the international group resident in India

7. Key benefits of the new form

This form is to be smart form. Wherever possible, drop-down options have been provided in the form. These will facilitate:

- **Ease and standardisation** in filling the form, and removal of ambiguity or confusion.
- **Simplified procedure** for filing.
- **Ease of compliance.**



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Income Tax Department

Central Board of Direct Taxes



Form Nos.
56, 57, 58, 59 and 60



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**Master File and
Country-by-Country Report (CbCR)
Form Nos. 56, 57, 58, 59 and 60**

1. Background

The Income Tax Department has introduced simplified forms under the Income-tax Act, 2025, effective from April 1, 2026. These measures are aimed at simplifying the procedure, and ensuring a transparent and smart filing system. While Form Nos. 56 and 57 relate to Master File, Form Nos. 58, 59 and 60 pertain to CbCR. These forms are intended to enhance tax transparency and compliance with transfer pricing regulations for multinational enterprises (MNEs).

2. Purpose

The Master File is furnished in Form No. 56, and Form No. 57 is an intimation by the designated constituent entity of an international group under Rule 123(4), which is required to be filed in those cases, where more than one constituent entities of an international group are required to furnish Form No. 56.

Form No. 58 is an intimation by every constituent entity, resident in India, of an international group, the parent entity of which is not resident in India, for the purposes of section 511(1) regarding the following:

- a) Whether it is an alternate reporting entity of the international group; or
- b) The details of the parent entity or the alternate reporting entity, if any, of the international group, and the country or territory of which the said entities are resident.

Form No. 58 intimates the Indian Income-tax authorities as to where the international group's CbCR will be filed. CbCR is furnished in Form No. 59, and Form No. 60 is an intimation on behalf of an international group with multiple constituent entities in India to designate a single entity that will file CbCR under section 511(4).

These forms:

- **Simplify the procedure for filing.**
- Provide better structured and standardised filing format.
- **Ensure ease of compliance.**

3. Who should file?

Form No. 56

Every person, being a constituent entity of an international group, shall file Form No. 56 if the following conditions are satisfied:

- The consolidated group revenue of the international group, as per its consolidated financial statements, exceeds INR 500 crores for the accounting year, and
- The aggregate value of international transactions as per the books of account exceeds INR 50 crores during the accounting year, or aggregate value of international transactions involving intangible property as per the books of account exceeds INR 10 crores during the accounting year.

However, as per Rule 123(3), the constituent entity shall furnish Part A of Form No. 56, even if the conditions prescribed in Rule 123(1) i.e. the above-mentioned conditions are not satisfied.

Form No. 57

Where there are more than one constituent entities of an international group required to file Form No. 56, it may be furnished by any one constituent entity, if the international group has designated such entity for this purpose; and the information has been conveyed to the Income Tax Department in Form No. 57 in this behalf in accordance with Rule 123(4).

Form No. 58

Form No. 58 is to be filed by every constituent entity, resident in India, which is part of an international group, if the parent entity of that group is not resident in India.

Form No. 59

Every parent entity, or the alternate reporting entity, as the case may be, resident in India, shall furnish CbCR in Form No. 59, provided the total consolidated group revenue of the international group exceeds INR 6,400 crore.

Further, a constituent entity of an international group, resident in India, other than parent entity or the alternate reporting entity, shall furnish CbCR in Form No. 59, in respect of the international group, within 12 months from the end of the reporting accounting year, if the parent entity is resident of a country or territory:

- where the parent entity is not obligated to file the report of the nature of Form No. 59 (CbCR); or

- where the parent entity is not obligated to file the report of the nature of Form No. 59 (CbCR); or
- with which India does not have an agreement providing for exchange of the report of the nature of Form No. 59 (CbCR); or
- there has been a systemic failure of the country or territory and the said failure has been intimated by the prescribed authority to such constituent entity;

However, where conditions of section 511(6) are satisfied, CbCR under section 511(4) will not be required to be filed.

Form No. 60

An international group with multiple constituent entities resident in India, is required to file Form No. 60 to designate a single entity to file Form No. 59 under section 511(4).

4. Frequency & Due Dates

Frequency	Due Date
Form No. 56 (Master File)	The due date for filing Form No. 56 is the same as the due date for filing the return of income as specified under section 263(1)(c).
Form No. 57	The due date for filing Form No. 57 is at least 30 days before the due date for filing Form No. 56.
Form No. 58	The due date for filing Form No. 58 is two months prior to the due date for furnishing Form No. 59 by the parent or alternate reporting entity. Form No. 59 is to be filed within 12 months from the end of the reporting accounting year.
Form No. 59 (CbCR)	Form No. 59 is required to be filed within 12 months from the end of the reporting accounting year. In case, the parent entity of the constituent entity is resident of a country or territory, where, there has been a systemic failure of the country or territory and the said failure has been intimated to such constituent entity, the period for filing shall be within six months from the end of the month in which the said systemic failure has been intimated.
Form No. 60	Although no timeline is prescribed under the Act or the Rules in respect of filing of Form No. 60, it is required to be filed at least 30 days before the due date of filing Form No. 59 (CbCR).

5. Structure of the forms

Form No. 56

Form No. 56 has two parts:

Part A: Particulars of the person

Part B: Other information

Part B includes details of all the constituent entities of the international group operating in India, details of all the constituent entities of the international group, and other details to be provided as separate enclosure as per Note 4 to the form which consists of Annexures A-1 to A-11.

Form No. 57

Form No. 57 has two parts:

- **Part A:** Particulars of the Designated Constituent Entity
- **Part B:** Other information

Form No. 58

Form No. 58 has two parts:

- **Part A:** Particulars of the Constituent Entity
- **Part B:** Other information

Form No. 59

Form No. 59 has five parts:

Part A: Particulars of Reporting Entity

Part B: Other basic details

Part C: Overview of Allocation of Income, Taxes and Business Activities by Tax Jurisdiction

Part D: List of all the Constituent Entities of the Multinational Enterprise Group included in Each Aggregation Per Tax Jurisdiction (Details to be filled constituent entities wise)

Part E: Additional information

Form No. 60

Form No. 60 has two parts:

Part A: Particulars of the international group

Part B: Other information