

Form No. 56 – Master File

Purpose:

Relevant rule for Form No. 56 is Rule 123 of the Income-tax Rules, 2026. Form No. 56 (Master File) is an income-tax reporting document with the purpose to enhance tax transparency and compliance with transfer pricing regulations for multinational enterprises (MNEs). The form is mandated under section 171 of the Income-tax Act, 2025 read with Rule 123 of the Income-tax Rules, 2026.

Who Should File:

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 crore for the accounting year, and
- The aggregate value of international transactions as per the books of account exceeds INR 50 crore during the accounting year, or aggregate value of international transactions involving intangible property as per the books of account exceeds INR 10 crore.

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 aforesaid conditions are not satisfied.

Frequency & Due Dates:

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) of the Income-tax Act, 2025.

Structure of Form No. 56:

Part A: Particulars of the person

Part A requires basic identification details such as name, address, PAN, email id and contact number of the constituent entity.

Part B: Other information

Part B requires Accounting Year for which the information and document are being submitted, details of the international group of which the assessee is a constituent entity, 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 include Annexures A-1 to A-11.

What are the documents required to file Form No. 56?

The following information/document in relation to the international group may 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

What is the process flow of filing Form No. 56?

Form No. 56 is an e-Form, and following are the steps to file it online:

- Login to the e-filing portal
- On the dashboard, click 'e-File' > 'Income Tax forms' > 'File Income Tax Forms'
- Scroll down to select Form No. 56
- Alternatively, enter Form No. 56 in the search box. Click on 'File now' button to proceed
- After checking the documents required for filing the form click on 'Let's Get Started'
- Fill all the necessary details, attach the necessary documents and click on 'Preview'
- After reviewing all the information, 'Proceed' to e-Verify'
- After verification Click on 'Yes' to submit the Form.

Form No. 57 – Intimation by a designated constituent entity, resident in India, of an international group, for the purposes of section 171(4)

Purpose:

Relevant rule for Form No. 57 is Rule 123 of the Income-tax Rules, 2026. Form No. 57 is an intimation by a designated constituent entity of an international group under Rule 123(4). It is required to be furnished in those cases where more than one constituent entities of an international group are required to furnish Form No. 56.

Who Should File:

Where there are more than one constituent entities of an international group required to file the 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 Department in Form No. 57 in this behalf in accordance with Rule 123(4). The constituent entity designated by the international group to comply with the requirements of section 171(1)(b) of the Income-tax Act, 2025 may file Form No. 57.

Frequency & Due Dates:

The due date for filing Form No. 57 is at least 30 days before the due date for filing Form No. 56 (Master File).

Structure of Form No. 57:

The structure and required information in Form No. 57 include:

- **Part A: Particulars of the Designated Constituent Entity** – Name, address and Permanent Account Number (PAN), email id, contact number of the designated constituent entity
- **Part B: Other information** – Name of the international group of which the assessee is a constituent entity, details of the parent entity of the international group, Accounting Year for which the report is being submitted

What are the documents required to file Form No. 57?

The following information/document in relation to the international group may 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

What is the process flow of filing Form No. 57?

Form No. 57 is an e-Form, and following are the steps to file it online:

- Login to the e-filing portal
- On the dashboard, click 'e-File' > 'Income Tax forms' > 'File Income Tax Forms'
- Scroll down to select Form No. 57
- Alternatively, enter Form No. 57 in the search box. Click on 'File now' button to proceed
- After checking the documents required for filing the form click on 'Let's Get Started'
- Fill all the necessary details and click on 'Preview'
- After reviewing all the information, 'Proceed' to e-Verify'
- After verification Click on 'Yes' to submit the Form.

Form No. 58 – Intimation by a 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)

Purpose:

Relevant rule for Form No. 58 is Rule 124 of the Income-tax Rules, 2026. 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) of the Income-tax Act, 2025 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 Country-by-Country Report (CbCR) [report as specified under section 511(2)] will be filed.

Who Should File:

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.

Frequency & Due Dates:

The due date for filing Form No. 58 is two months prior to the due date for furnishing the CbCR (Form No. 59) by the parent or alternate reporting entity. The CbCR (Form No. 59) is to be filed within 12 months from the end of the reporting accounting year.

Structure of Form No. 58:

The structure and required information in Form No. 58 include:

- **Part A: Particulars of the Constituent Entity** – Name, address and Permanent Account Number (PAN), email id, contact number of the constituent entity
- **Part B: Other information** – Name of the international group of which the assessee is a constituent entity, details of the parent entity of the international group; if the international group has designated an alternate reporting entity in place of the parent entity to furnish the report referred to in section 511(2), name, address and country of residence of the alternate reporting entity to be provided; Reportable Accounting Year

What are the documents required to file Form No. 58?

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

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

What is the process flow of filing Form No. 58?

Form No. 58 is an e-Form, and following are the steps to file it online:

- Login to the e-filing portal
- On the dashboard, click 'e-File' > 'Income Tax forms' > 'File Income Tax Forms'
- Scroll down to select Form No. 58

- Alternatively, enter Form No. 58 in the search box. Click on 'File now' button to proceed
- After checking the documents required for filing the form click on 'Let's Get Started'
- Fill all the necessary details and click on 'Preview'
- After reviewing all the information, 'Proceed' to e-Verify'
- After verification Click on 'Yes' to submit the Form.

Form No. 59 – Country-by-Country Report (CbCR)

Purpose:

Relevant rule for Form No. 59 is Rule 124 of the Income-tax Rules, 2026. Form No. 59 is used for filing the Country-by-Country Report (CbCR) of an international group under section 511 of the Income-tax Act, 2025.

Who Should File:

Every parent entity or the alternate reporting entity, as the case may be, resident in India, shall, for every reporting accounting year, furnish the 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 the CbCR in Form No. 59, in respect of the international group for a reporting accounting year 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
- 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, the CbCR under section 511(4) will not be required to be filed.

Frequency & Due Dates:

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.

Structure of Form No. 59:

The structure and required information in Form No. 59 include:

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

What are the documents required to file Form No. 59?

The following information/document in relation to the international group may 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

What is the process flow of filing Form No. 59?

Form No. 59 is an e-Form, and following are the steps to file it online:

- Login to the e-filing portal
- On the dashboard, click 'e-File' > 'Income Tax forms' > 'File Income Tax Forms'
- Scroll down to select Form No. 59
- Alternatively, enter Form No. 59 in the search box. Click on 'File now' button to proceed
- After checking the documents required for filing the form click on 'Let's Get Started'
- Fill all the necessary details and click on 'Preview'
- After reviewing all the information, 'Proceed' to e-Verify'
- After verification Click on 'Yes' to submit the Form.

Form No. 60 – Intimation on behalf of the international group for the purposes of section 511(5)

Purpose:

Relevant rule for Form No. 60 is Rule 124 of the Income-tax Rules, 2026. 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 the Country-by-Country Report (Form No. 59) under section 511(4) in India.

Who Should File:

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) of the Income-tax Act, 2025.

Frequency & Due Dates:

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 (Country-by-Country Report).

Structure of Form No. 60:

The structure and required information in Form No. 60 include:

Part A: Particulars of the international group

Part B: Other information

What are the documents required to file 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

What is the process flow of filing Form No. 60?

Form No. 60 is an e-Form, and following are the steps to file it online:

- Login to the e-filing portal
- On the dashboard, click 'e-File' > 'Income Tax forms' > 'File Income Tax Forms'
- Scroll down to select Form No. 60
- Alternatively, enter Form No. 60 in the search box. Click on 'File now' button to proceed
- After checking the documents required for filing the form click on 'Let's Get Started'
- Fill all the necessary details and click on 'Preview'
- After reviewing all the information, 'Proceed' to e-Verify'
- After verification Click on 'Yes' to submit the Form.