

**State of Tax Justice 2025: Policy Tracker Methodology
Note - Grading Countries on Public Country-by-Country
Reporting (pCbCR)**

November 2025

1. Introduction

This note provides a detailed methodological explanation of how the Policy Tracker assesses the implementation of public Country-by-Country Reporting (pCbCR) across 215 jurisdictions. The methodology aims to provide a consistent, transparent, and replicable framework to evaluate the extent and quality of CbCR regimes globally, identifying which countries are leading in promoting corporate tax transparency and where progress remains limited.

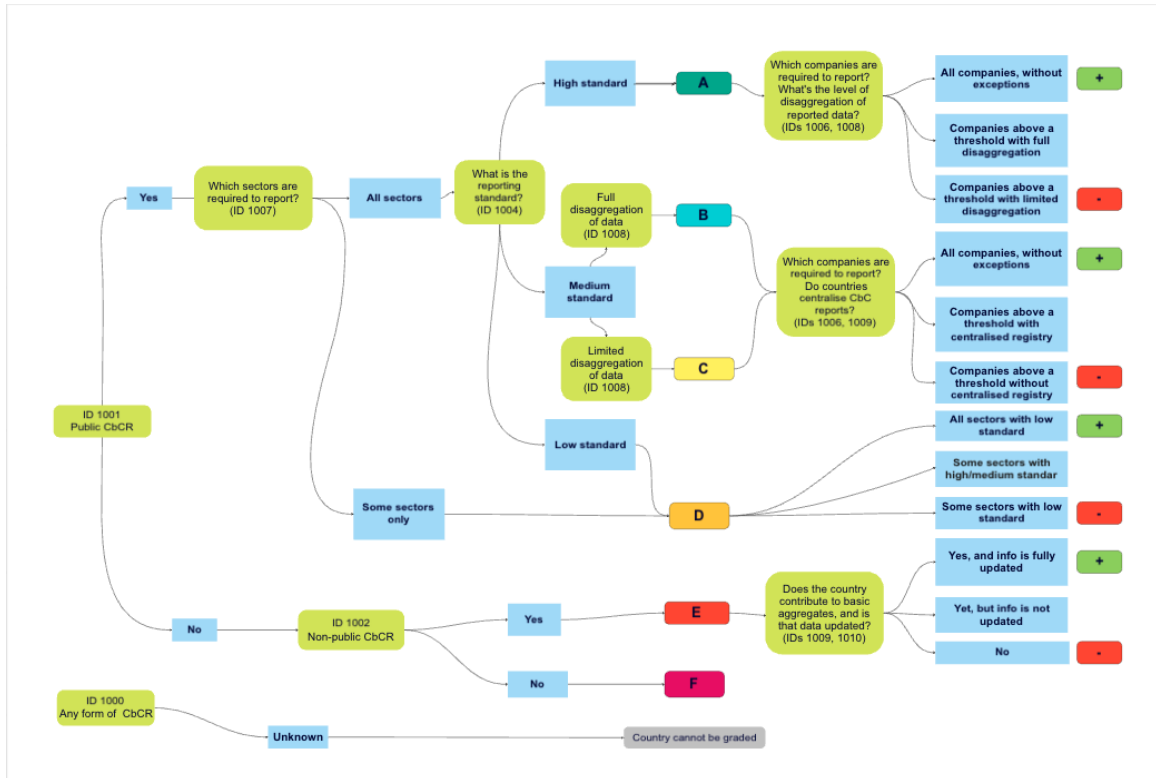
2. Overview

The Policy Tracker evaluates the legal and practical implementation of Country-by-Country Reporting (CbCR) obligations for multinational enterprises (MNEs). The pCbCR component focuses on whether reports are made publicly available, the scope of entities covered, the level of disaggregation of data, and the degree to which countries centralise and update such information. Grades range from A (highest standard) to F (no country-by-country reporting at all).

3. Step-by-Step Decision Framework

The grading process follows a structured decision tree (Figure 1) to ensure comparability and objectivity. Countries are assessed through a series of diagnostic questions that determine the nature, strength, and coverage of their CbCR regimes. Each branch of the decision tree corresponds to a variable that contributes to the final grade. This decision logic ensures that grades reflect both formal legal provisions and their effective implementation.

Figure 1. Decision Framework for pCbCR Grading



4. Grading Scale and Criteria

The pCbCR grading scale classifies jurisdictions based on their reporting scope, standard, and transparency practices (Table 1). Grades A to C denote varying levels of public reporting quality of full pCbCR regimes with high or medium reporting standards, D corresponds to sector-specific or low standard transparency, E to non-public CbCR, and F to the absence of any reporting framework.

Table 1. Grading Scale for Public Country-by-Country Reporting

Grade	Description	Sub-grade	Description
A	Requires public country by country reporting for all sectors under the “GRI standard Tax: 207”	A+	Requires all companies to publicly disclose their country-by-country reports under the “GRI standard Tax: 207” or a similar high standard
		A	Requires all companies with revenues above a certain threshold to publicly disclose their country-by-country reports under the

	or a similar high standard		"GRI standard Tax: 207" or a similar high standard with full disaggregation.
		A-	Requires all companies with revenues above a certain threshold to publicly disclose their country-by-country reports under the "GRI standard Tax: 207" or a similar high standard with limited disaggregation.
B	Requires public country by country reporting for all sectors under the "OECD standard" or a similar medium standard with full disaggregation	B+	Requires all companies to publicly disclose their country-by-country reports under the "OECD standard" or a similar "medium standard" with full disaggregation.
		B	Requires all companies above a certain threshold to publicly disclose their country-by-country reports under the "OECD standard" or a similar medium standard with full disaggregation and compiles info in a centralised register.
		B-	Requires all companies above a certain threshold to publicly disclose their country-by-country reports under the "OECD standard" or a similar medium standard with full disaggregation but does not compile info in centralised register.
C	Requires public country by country reporting for all sectors under the "OECD standard" or a similar medium standard with limited disaggregation.	C+	Requires all companies to publicly disclose their country-by-country reports under the "OECD standard" or a similar "medium standard" with limited disaggregation.
		C	Requires all companies above a certain threshold to publicly disclose their country-by-country reports under the "OECD standard" or a similar "medium standard" with limited disaggregation and compiles info in centralised register.
		C-	Requires all companies above a certain threshold to publicly disclose their country-by-country reports under the "OECD standard" or a similar medium standard with limited disaggregation but does not compile info in centralised register.
D	Requires either public country by country reporting for some sectors or for all sectors with a low standard	D+	Requires all sectors to to publicly disclose their country-by-country reports under a low standard
		D	Requires some sectors to publicly disclose their country-by-country reports under a high/medium standard
		D-	Requires some sectors to publicly disclose their country-by-country reports under a low standard.

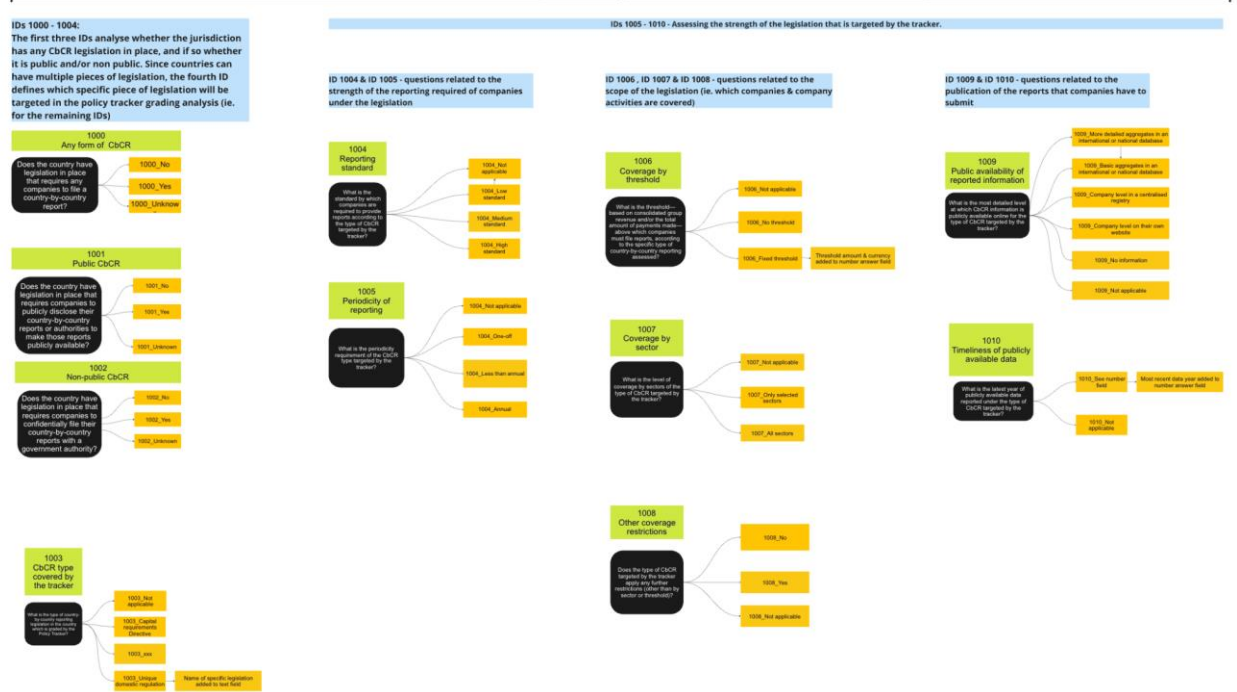
E	Requires companies to provide non-public country by country reports to tax authorities.	E+	Requires companies to provide their country-by-country reports confidentially to tax authorities and contributes to basic aggregate and anonymized data for statistical databases and the data is updated.
		E	Requires companies to provide their country-by-country reports confidentially to tax authorities and contributes to basic aggregate and anonymized data for statistical databases but the data is not updated .
		E-	Requires companies to provide their country-by-country reports confidentially to tax authorities but no aggregate data is published at statistical databases.
F	No country-by-country reporting at all	F	Does not require companies to file country-by-country reports

5. Underlying Variables and Indicators

The grading methodology draws from a comprehensive set of eleven variables (IDs 1000–1010) that capture the essential components of each jurisdiction’s CbCR regime. These variables are derived from legislative sources, regulatory documentation, and publicly available databases (See Figure 2).

Figure 2. Variables used in the assessment

CbCR IDs - Overview



Each indicator corresponds to a specific aspect of the CbCR framework, such as scope of coverage, threshold levels, sectoral inclusion, reporting periodicity, and public availability of data. Together, they provide the empirical foundation for assigning pCbCR grades.

6. Interpreting Differences Between High, Medium, and Low Standards

Public country-by-country reporting (pCbCR) regimes vary widely across jurisdictions. The Policy Tracker methodology distinguishes among high, medium, and low standards of reporting.

Table 2. Standards of reporting used by the Policy Tracker

Category	Low Information Standard	Medium Information Standard	High Information Standard
Basic Information			
Receiving jurisdiction	✓	✓	✓

Category	Low Information Standard	Medium Information Standard	High Information Standard
Name of entities	X	X	✓
Description of activities	X	✓	✓
Financial Data			
Revenue	X	✓	✓
Revenues from third-party sales	X	X	✓
Revenues from intra-group sales	X	X	✓
Profit or loss before tax	X	✓	✓
Tangible assets other than cash	X	X	✓
Number of employees	X	✓	✓
Tax Data			
Income tax paid	✓	✓	✓
Income tax charged	X	✓	✓
Reasons for the difference between corporate income tax accrued on profit/loss and the tax due if the statutory tax rate is applied to profit/loss before tax	X	X	✓

7. Data Sources

The Policy Tracker relies on multiple verified data sources, including documents from the OECD, service firms, official documents, and civil society organisations. Legislation

and regulatory documents were cross-checked and standardised to ensure consistency across jurisdictions.

8. Analytical Framework and Weighting

A country can maintain more than one CbCR regime (e.g., all sectors pCbCR alongside sectoral extractives and/or banking). In such cases, the Tracker first records all regimes and then evaluates the most comprehensive regime using the following hierarchy of features. The first group of variables (IDs 1000–1003) describes what types of regimes exist; the subsequent variables (IDs 1004–1010) assess the strongest regime against this hierarchy.

Table 3. Features of CbCR regimes and weighing priority in the methodology

Feature	Priority level in the methodology – as a weighing factor
Public CbCR	1
Coverage: all sectors > some sectors	2
Standard of reporting: high > medium > low	3
Disaggregation of data: full (comprehensive country-by-country) > limited	3/4
Coverage: all companies > companies above a threshold	4
Availability: centralised public registry > company websites only	4
Latest year available (timeliness)	4

Under this hierarchy, when multiple frameworks coexist, the regime scoring highest is used for grading (IDs 1004–1010). Less comprehensive regimes remain documented for completeness but do not drive the grade. This ensures countries receive credit for their strongest transparency instrument while preserving a full legislative record.

Public disclosure carries the greatest analytical weight in the scoring system. Full-sector, with high and medium standards of reporting earns higher grades (A–C), whereas low reporting standards or limited sectors lowers grade to D. Grade E reflect regimes that

restrict reporting to confidential exchanges (e.g. BEPS Action 13 CbCR) and Grade F lacks CbCR obligations entirely.

9. Assessing Jurisdictions' Level of Responsibility

In addition to grading quality, the Policy Tracker categorises jurisdictions by their level of responsibility—high, medium, or low—to implement public CbCR. This classification reflects both the concentration of MNEs operating in the jurisdiction (based on OECD aggregate data) and the jurisdiction's role in global profit shifting (based on the Financial Secrecy Index and Corporate Tax Haven Index).

Table 4. Responsibility levels in implementing pCbCR

Responsibility Tier	Core Criterion	Adjustment via FSI/CTHI	Policy Implication
High	Above 75th percentile in number of reporting MNEs	Add Top 25 of FSI/CTHI	Immediate impact on global transparency
Low	Below 75th percentile	No adjustment	Decreasing marginal impact on corporate transparency, more limited and redundant MNE presence

This approach reflects the principle that countries hosting the largest share of multinationals—or serving as key secrecy hubs—carry the greatest responsibility for advancing transparency. Once these jurisdictions disclose, the marginal gains in transparency from smaller markets diminish.

10. Policy Relevance and Link to the Sevilla Commitment

The Sevilla Commitment explicitly pledges to strengthen CbCR and consider the creation of a central public database. Under the OECD BEPS Action 13 framework, tax administrations already collect and exchange CbCR data. The UN Framework Convention on International Tax Cooperation (UNFCITC) offers the opportunity to extend this system toward universal, public access.

11.Dataset Coverage and Availability

The current version of the Tracker covers 215 jurisdictions, including all UN Member States and selected non-sovereign territories with significant multinational presence. Each jurisdiction's dataset entry provides structured responses to the 10 key indicators, serving as the empirical foundation for cross-country comparability. The full dataset, including metadata and documentation, will be made available through the Policy Tracker online platform.