GUIDANCE 26 MAY 2025

# Fields in E-tax for companies (DIAS)

Companies taxed according to sections 1(1)(1) and 1(1)(6) of the Danish Corporation Tax Act (*Selskabsskatteloven*)



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# 1. Report – tab 1

#### 1.1 Declaration instead of tax return

This option is only available to entities covered by section 1(1)(6) of the Corporation Tax Act.

Field number	Туре	Description	Guidance text
133	Boolean	If the taxpayer fulfils the condi- tions in section 24A of the Corporation Tax Act, does the tax- payer wish to submit a declaration instead of a tax return?	In order to be able to make a declaration, the taxpayer's funds must only be used for charitable or other non-profit purposes in the association.
133b	Boolean	Is the taxpayer's taxable income higher or lower than DKK 100,000?	The taxable income is before deduction of distributions and provisions.
133c	Boolean	Has significant extraordinary in- come been received in the income year?	Extraordinary income is income resulting from the disposal, transfer or relinquishment of capital assets.

# **1.2 Income information**

Field number	Туре	Description	Guidance text
71	Amount	CVR no./SE no.	CVR number or SE number to which the tax liability is registered.
72	Text	Name of the company	Registered name
73	Date	Start date of income pe- riod	The field is based on the company's basic registrations. Start date of the period for which the company is about to report. If the company disagrees with the date, the company or the man- agement company (for groups of jointly taxed companies) can, in certain cases, change the date via the basic registrations in E-tax for companies (DIAS). If the company or the management company cannot change the date via the basic registrations, the company can contact the Dan- ish Tax Agency ( <i>Skattestyrelsen</i> ).
74	Date	End date of income pe- riod	The field is based on the company's basic registrations. End date of the period for which the company is about to report. If the company disagrees with the date, the company or the man- agement company (for groups of jointly taxed companies) can, in certain cases, change the date via the basic registrations in E-tax for companies (DIAS). If the company or the management company cannot change the date via the basic registrations, the company can contact the Dan- ish Tax Agency ( <i>Skattestyrelsen</i> ).

76	Amount	Declared taxable income before deduction and al- location of losses	The field must be reported. The reported amount must be the taxable income before deduction and allocation of losses, that is both before deduction of losses from previous income years and before allocation of losses for the current income year. For groups of jointly taxed companies, the management company fills in the field for each of the jointly taxed companies etc. Amounts entered in field 76 are summarised by the Tax Agency in field 080 and shown for the management company. The summa- rised amount constitutes the jointly taxable income before deduction and allocation of losses. If the company has applied for a tax credit according to the rules in section 8X of the Danish Tax Assessment Act ( <i>Ligningsloven</i> ), the negative taxable income must not be reduced by the amount on which the tax credit is calculated. This will instead take place in field 004.
76a	Amount	Taxable income after al- location of losses	The field is a calculation field, calculating the company's share of the jointly taxable income after allocation of losses. The manage- ment company reports the use of losses for the group of jointly taxed companies. Reference is made to field 082 Own loss carryfor- ward from previous years, field 083 Share of losses for the year carried forward and field 084 Share of other entities' losses from previous years carried forward, which can be seen in the tax return for the management company.
78	Amount	Income or profit accord- ing to section 2(1)(b) of the Corporation Tax Act	State here the amount corresponding to the income or profit ac- cording to section 2(1)(b) of the Corporation Tax Act received by a pension provider covered by section 13J of the Corporation Tax Act.
77	Amount	Assessed taxable in- come before deduction of losses for the current and previous income years	Reported by the Tax Agency in connection with the completion of a reopened tax return or estimated assessment of the taxable income. This field is used to calculate the assessed taxable income. The field is shown when it is filled in.
79	Amount	Tax on income or profit according to section 2(1)(b) of the Corpora- tion Tax Act	(Empty)
80	Amount	Summation of declared jointly taxable income before deduction of losses for the current and previous income years	Summation of all reported amounts in field 076 for all jointly taxed companies etc. This is the jointly taxable income before deduction of losses for the current and previous income years Shown for the management company.
81	Amount	Assessed jointly taxable income before deduction of losses for the current and previous income years	Reported by the Tax Agency in connection with the completion of a reopened tax return or estimated assessment of the taxable income for one or more jointly taxed companies. The field is a summary of all the jointly taxed companies' income be- fore deduction of losses for the current and previous income years, and after the Tax Agency has made a tax assessment, and the field is the basis for a new assessment of the jointly taxable income after losses. The field is shown when it is filled in.

3	Amount	Carryforward of tax losses from previous in- come years	Contains the tax losses for the year carried forward from previous income years. The amount should be entered without plus or minus signs. For separately taxed companies etc. for which no events have oc- curred during the year affecting the company's loss carryforward, the amount is automatically calculated on the basis of the infor- mation in the loss register. If the company etc. disagrees with the automatic calculation, the amount may be overwritten. For separately taxed companies etc. for which events have oc- curred during the year affecting the company's loss carryforward, the amount must be reported. For jointly taxed companies etc., the total carryforward of losses from previous years for the entire group of jointly taxed companies must be reported by the management company.
4	Amount	Sum of all losses related to research activities	This field contains the total loss that forms the basis for the applica- tion for payout under the tax credit scheme, see section 8X of the Tax Assessment Act.
16	Amount	Taxable income after loss carryforward	The amount is calculated by the Tax Agency on the basis of the available information provided by the company. The field contains taxable income after losses. Negative taxable in- come is shown with - (minus sign). For the individual company, the set-off of losses from previous years may not exceed the year's positive taxable income before loss car- ryforward. For jointly taxed companies, the jointly taxable income is calculated by the management company on the basis of the available infor- mation provided by the companies.
17	Amount	Assessed taxable in- come after loss carryforward	Reported by the Tax Agency in connection with the completion of a reopening of the company's tax return or the Tax Agency's esti- mated assessment ) of the taxable income. The field contains estimated taxable income after losses. For the individual company, the set-off of losses from previous years may not exceed the year's positive taxable income before loss car- ryforward. For jointly taxed companies, the jointly taxable income is calculated after losses by the management company. The field is shown when it is filled in.

85	Amount	Loss balance at the end of the period to be offset against future taxable in- come	Contains the loss balance at end of the period to be offset against future taxable income. The balance is without plus or minus signs. The amount is calculated by the Tax Agency on the basis of the in- formation available in the loss register from the company etc. The amount is the sum of all residual losses for the company al- lowed for carryforward. If the company is a management company, the amount will be the sum of all the residual losses allowed for car- ryforward for the group of jointly taxed companies. Only losses from subsidiaries subject to joint taxation at the end of the income year and which are in the same income year as the management com- pany are included. In SKAT's E-tax solution, companies can extract a detailed report of their losses. If the company is a management company, a report can be extracted for all the jointly taxed companies. Jointly taxed companies must report updates to the loss register when changes are made to the group of jointly taxed companies as the corporation tax system does not calculate this automatically, at present.
10	Amount	Number of days late in connection with the cal- culation of penalty	The number of days late is calculated by the system on the basis of the deadline for filing the tax return and the date of reporting.
30	Amount	Penalty	Here, a penalty is reported in DKK by the Tax Agency when the tax return is received too late. The penalty per day is DKK 200, but a maximum of DKK 5,000 per company. In case of joint taxation, the penalty is reported for the management company for those jointly taxed companies for which the tax return has been received too late.
11	Yes:x/No:x	Estimated assessment	This field is filled in when an estimated assessment has been made. The field is marked as filled in when a proper tax return has not been submitted.

#### **1.2.1 Special funding contribution**

This is relevant only to entities covered by section 1(1)(1) of the Corporation Tax Act.

Field number	Туре	Description	Guidance text
31	Text	CVR no./SE no.	CVR/SE no. of the taxable company to which fields 032, 032a and 033 relate.
32	Amount	Declared taxable income before deduction and al- location of losses and before factor increase, see section 17A of the Corporation Tax Act. For the period, this income is covered by section 17A of the Corporation Tax Act.	In this field, declare the taxable income that should otherwise have been reported in field 076. The amount is used to calculate the taxa- ble income after a factor increase, see section 17A of the Corporation Tax Act.

32a	Amount	Calculated taxable in- come before deduction and allocation of losses, but after factor increase, see section 17A of the Corporation Tax Act.	This field calculates the income according to section 17A of the Cor- poration Tax Act, based on the income declared in field 032. The amount is transferred to field 076 on the income side.
32b	Amount	Factor associated with funding contributions from the financial sector, see section 17A of the Corporation Tax Act.	-
33	Amount	Declared taxable income before deduction and al- location of losses. Income during the period that is not covered by section 17A of the Cor- poration Tax Act.	The declared amount must be the taxable income before deduction and allocation of losses that should otherwise have been entered in field 076, meaning both before deduction of losses from previous in- come years and before allocation of losses for the current income year. The amount is transferred to field 076 on the income side.
34	Amount	Tax calculated on the factor increase	The tax calculated on the factor increase.

# **1.2.2 Carryforward of losses attributed to specific sources of** income

Field number	Туре	Description	Guidance text
86	Amount	End-of-period loss bal- ance, see the Danish Capital Gains Tax Act ( <i>Ak- tieavancebeskatningslove</i> <i>n</i> )	The end-of-period balance must be declared and entered without plus or minus signs. End-of-period loss balance according to sections 9, 19 and 43 of the Capital Gains Tax Act, section 31A of the Danish Gains on Se- curities and Foreign Currency Act ( <i>Kursgevinstloven</i> ) and end-of- period net capital losses according to section 22(9) of Act No. 525 of 12 June 2009. Loss balances on shares etc. according to the following rules are entered together. See the help form for guidance – Use the link to the help form. As the rules on loss carryforward are different, information about the different loss balances must be filed together with other infor- mation for the tax return. End-of-period balances for carryforward of losses attributed to specific sources of income must be declared in the fields. References to legal acts: Section 1(1) of the Tax Control Act
87	Amount	End-of-period loss bal- ance, see section 6 of the Danish Act on Taxation of Profit from Sale of Real Property ( <i>Ejendomsa-</i> <i>vancebeskatningsloven</i> )	The end-of-period balance must be declared and entered without plus or minus signs. End-of-period loss balance according to section 6 of the Act on Taxation of Profit from Sale of Real Property. End-of-period balances for carryforward of losses attributed to specific sources of income must be stated in the field. This will appear from the tax assessment notice. References to legal acts: Section 1(1) of the Tax Control Act
88	Amount	End-of-period loss bal- ance, see section 31 of the Gains on Securities and Foreign Currency Act	The end-of-period balance must be declared and entered without plus or minus signs. End-of-period loss balance according to section 31 of the Gains on Securities and Foreign Currency Act.

	End-of-period balances for carryforward of losses attributed to specific sources of income must be stated in the field. This will appear from the tax assessment notice. References to legal acts: Section 1(1) of the Tax Control Act
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#### **1.2.3 Recapture of tax loss**

This is relevant only to entities covered by section 1(1)(1) of the Corporation Tax Act.

Field number	Туре	Description	Guidance text
180a	Amount	Recapture of tax loss, see section 31B(2) of the Cor- poration Tax Act, cf. section 31A(10) (interna- tional joint taxation) – tax value	For international joint taxation, the management company must declare the group's recapture of tax loss. Recapture of tax loss is entered as the tax value without plus or minus signs.
180b	Amount	Recapture of tax loss, see section 31B(2) of the Cor- poration Tax Act, cf. section 31A(12) (interna- tional joint taxation) – permanent business estab- lishment/property 'exemption country'	For international joint taxation, the management company must declare the group's recapture of tax loss. If the group has permanent business establishments and proper- ties abroad where recapture is subject to section 33D of the Tax Assessment Act, see section 31A(12) of the Corporation Tax Act, because Denmark's double taxation agreement entails relief ac- cording to the exemption method, the recapture of tax losses from these must be entered in the field. Recapture of tax losses is entered without plus or minus signs.
181a	Amount	Recapture of tax loss, see section 15(8) and (9) of Act No. 426 of 6 June 2005 as amended by sec- tion 6 of Act No. 344 of 18 April 2007 (shadow joint taxation) – tax value	In case of shadow joint taxation, recapture of tax loss must be declared for the company liable to pay tax on the recapture. Recapture of tax loss is entered as the tax value without plus or minus signs.
181b	Amount	Recapture of tax loss, see section 15(8) and (9) of Act No. 426 of 6 June 2005 as amended by sec- tion 6 of Act No. 344 of 18 April 2007 (shadow joint taxation) – permanent business establish- ment/property 'exemption country'	In case of shadow joint taxation, recapture of tax loss must be declared for the company liable to pay tax on the recapture. In case of recapture of tax loss from foreign permanent business establishments and properties where recapture of tax loss is sub- ject to section 33D of the Tax Assessment Act, as mentioned in section 15(9) of Act no. 426 of 6 June 2005, because Denmark's double taxation agreement entails relief according to the exemp- tion method, recapture of tax loss from these must be stated in the field. Recapture of tax losses is entered without plus or minus signs.

# 1.2.4 Loss carryforward for application under the tax credit scheme

Field number	Туре	Description	Guidance text
9	Yes:x/No:x	Is the company applying for payout of the tax value of losses arising from re- search expenses, see section 8X of the Tax As- sessment Act?	The field is mandatory and must be filled in with Yes or No. Se- lect Yes if the company has applied for payout of the tax value of losses arising from research expenses, see section 8X of the Tax Assessment Act The application no longer needs to be sent separately to the Tax Agency, but is received automatically when the tax return has been submitted.

		Note! A Yes in this field, will start the application pro- cess, which previously required manual submis- sion of a form via skat.dk.	
9X	Amount	Sum of all 9 fields	(Empty)
82	Amount	Carryforward of own losses from previous years	(Empty)
83	Amount	Allocation of jointly taxed losses for the year	(Empty)
84	Amount	Allocation of jointly taxed losses for previous years	(Empty)

### **1.3** Application for tax credit

#### 1.3.1 Contact details

Field number	Туре	Description	Guidance text
600	Text	Name (advisor if applicable)	State here the name of the person who can be contacted if there are questions about the information provided.
601	Text	Email	State here the email address of the person who can be contacted if there are questions about the information provided.
602	Text	Tel.	State here the telephone number of the person who can be contacted if there are questions about the information provided.
603	Text	Mobile	State here the mobile telephone number of the person who can be contacted if there are questions about the in- formation provided.
604	Various options	The applicant is: - Individual company - Jointly taxed companies - Same owner of several compa- nies; both jointly taxed and individual	

There are a number of options to choose from in field 604, which will open up for additional fields depending on whether you have answered individual, jointly taxed companies or same owner of several companies, both jointly taxed and individual.

#### Application for tax credit – field 604: Individual

Field number	Туре	Description	Guidance text
607		Is the income year/sub-period less than 12 months?	(Empty)
607A		Income period	(Empty)
9a	Amount	Loss related to research activities	In this field, enter the amount of loss on which the appli- cation for payout under the tax credit scheme is based. The loss amount in field 009a must have reduced the negative taxable income in field 076 and must not be included in the calculation of taxable income. The amount must be entered without plus or minus signs. Jointly taxed companies are considered as a single en- tity. The expenses must have been incurred in the income year/sub-period and written off according to section 8B(1) of the Tax Assessment Act or section 6(1)(3) of the Depreciation Act. Increased deductions cannot be included.
609	Amount	Tax value of the loss forming the basis for the application	(Empty)
610	Amount	The tax value of the total loss for payout	(Empty)

### Application for tax credit – field 604: Jointly taxed

Field number	Туре	Description	Guidance text
613		Negative jointly taxable income before reduction of losses relat- ing to research activities	Calculated according to profit-making companies' car- ryforward of own losses from previous income years and after offsetting/reallocation of the year's jointly taxable income
607J		Is the income year/sub-period less than 12 months?	(Empty)
607aJ		Income period	(Empty)
9Ь	Amount	Loss related to research activities	In this field, enter the amount of loss on which the appli- cation for payout under the tax credit scheme is based. The loss amount in field 009a must have reduced the negative taxable income in field 076 and must not be included in the calculation of taxable income. The amount must be entered without plus or minus signs. Jointly taxed companies are considered as a single en- tity. The expenses must have been incurred in the income year/sub-period and written off according to section 8B(1) of the Tax Assessment Act or section 6(1)(3) of the Depreciation Act. Increased deductions cannot be included.

# Application for tax credit – field 604: Same owners, several companies

Field num- ber	Туре	Description	Guidance text
615	Date	Income year/sub-period	(Empty)
616	Amount	CPR No./TIN No.	(Empty)
617	Text	Name	(Empty)
618	Amount	Total amount in the application for payout	(Empty)
619MS		Add Individual	
620	Amount	CVR no./SE no.	CVR no./SE no. of the separately taxed company
621	Text	Name	Enter the name of the separately taxed company
606MS	Amount	Negative taxable income before reduction of losses relating to re- search activities	(Empty)
624MS	Date	Is the income year/sub-period less than 12 months?	(Empty)
9c	Amount	Loss related to research activi- ties	In this field, enter the amount of loss on which the application for payout under the tax credit scheme is based. The loss amount in field 009a must have reduced the negative taxable income in field 076 and must not be included in the calculation of taxable income. The amount must be entered without plus or minus signs. Jointly taxed companies are considered as a single entity. The expenses must have been incurred in the income year/sub-period and written off according to section 8B(1) of the Tax Assessment Act or section 6(1)(3) of the Depreciation Act. Increased deductions cannot be included.
609MS	Amount	Tax value of the loss forming the basis for the application	(Empty)
619MJ		Add Jointly taxed	
622	Amount	The management company's CVR no./SE no.	CVR no./SE no. of the management company
623	Text	Name of the management company	State here the name of the management company for the group of jointly taxed companies
613MJ	Amount	Negative jointly taxed income be- fore reduction of losses relating to research activities	Calculated according to profit-making companies' car- ryforward of own losses from previous income years and after offsetting/reallocation of the year's jointly taxable income
624MJ	Date	Is the income year/sub-period less than 12 months?	

9d	Amount	Loss related to research activi- ties	In this field, enter the amount of loss on which the application for payout under the tax credit scheme is based. The loss amount in field 009a must have reduced the negative taxable income in field 076 and must not be included in the calculation of taxable income. The amount must be entered without plus or minus signs. Jointly taxed companies are considered as a single entity. The expenses must have been incurred in the income year/sub-period and written off according to section 8B(1) of the Tax Assessment Act or section 6(1)(3) of the Depreciation Act. Increased deductions cannot be included.
609MJ	Amount	Tax value of the loss forming the basis for the application	(Empty)
625	Yes:x/No:x	Is a company under the corpora- tion tax scheme included in the application for a tax credit?	Answer Yes if, in addition to separately taxed and jointly taxed companies, the shareholder owns compa- nies covered by the corporation tax scheme
613R	Amount	Negative jointly taxable income before reduction of losses relat- ing to research activities	Calculated according to profit-making companies' car- ryforward of own losses from previous income years and after offsetting/reallocation of the year's jointly taxable income
607R	Yes:x/No:x	Is the income year/sub-period less than 12 months?	(Empty)
607RA	Date	Income period	(Empty)
9e	Amount	Loss related to research activi- ties	In this field, enter the amount of loss on which the application for payout under the tax credit scheme is based. The loss amount in field 009a must have reduced the negative taxable income in field 076 and must not be included in the calculation of taxable income. The amount must be entered without plus or minus signs. Jointly taxed companies are considered as a single entity. The expenses must have been incurred in the income year/sub-period and written off according to section 8B(1) of the Tax Assessment Act or section 6(1)(3) of the Depreciation Act. Increased deductions cannot be included.
609R	Amount	Tax value of the loss forming the basis for the application	(Empty)

## 1.4 Dividends and relief

Field number	Туре	Description	Guidance text
91	Amount	Danish dividends received (gross) without withheld dividend tax in the income year	In the field, enter the dividends received in the income year. It is the total amount of dividends that must be en- tered without withheld dividend tax. 'Received' means that the dividend adoption date is in the income year.

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193	Amount	Danish dividends received (gross) including withheld dividend tax of 15.4% in the income year	The dividend tax is offset as tax paid in the income year in which the dividends are taxed. The Tax Agency calcu- lates how much dividend tax is to be included in the tax assessment notice as tax paid. The dividends (gross) re- ceived in the income year from which 15.4% dividend tax is withheld must be entered in this field. Please note that all dividends (100%) must be entered regardless of any advance repayments, see section 29D or section 29E(2) of the Corporation Tax Act. 'Received' means that the dividend adoption date is in the income year.
192	Amount	Danish dividends received (gross) including withheld dividend tax of 22% in the income year	The dividend tax is offset as tax paid in the income year in which the dividends are taxed. The Tax Agency calcu- lates how much dividend tax is to be included in the tax assessment notice as tax paid. The dividend (gross) re- ceived in the income year from which 22% dividend tax is withheld must be entered in this field. Please note that all dividends (100%) must be entered regardless of any ad- vance repayments, see section 29D or section 29E(2) of the Corporation Tax Act. 'Received' means that the dividend adoption date is in the income year.
191	Amount	Danish dividend received (gross) with 27% dividend tax withheld	The dividend tax is offset as tax paid in the income year in which the dividends are taxed. The Tax Agency calcu- lates how much dividend tax is to be included in the tax assessment notice as tax paid. The dividends (gross) re- ceived in the income year from which 27% dividend tax has been withheld must be entered in this field. Please note that all dividends (100%) must be entered regard- less of any advance repayments, see section 29D or section 29E(2) of the Corporation Tax Act. 'Received' means that the dividend adoption date is in the income year.
94	Amount	Dividends received from abroad (gross) in the income year	The total foreign dividend amount received must be en- tered in the field. Please note that relief for foreign dividend tax must be stated in field 019 Relief for foreign tax (not exceeding the Danish tax). 'Received' means that the dividend adoption date is in the income year.
19	Amount	Calculated relief for foreign tax according to section 33 of the Tax Assessment Act or a double taxa- tion agreement (not exceeding the Danish tax)	Enter the relief amount according to section 33 of the Tax Assessment Act or the double taxation agreement as an amount without a plus or minus sign to be deducted from the calculated income tax. The relief amount cannot exceed the Danish tax. The tax- able income is rounded down to DKK 100s without decimals before the calculation of Danish tax. Documentation must be provided of the foreign tax paid.
37	Amount	The company's distributed divi- dends on the basis of the reported income period stated in the tax re- turn, including extraordinary distributions. REMEMBER – unlisted companies must also report dividend recipi- ent(s) for the same amount.	Dividends distributed for the reported income year. Any distributions made on account during the income year must be included. Please note that in addition to field 37, companies not administered by VP Securities (the Danish central securities depository) are obliged to separately report dividend recipients, distributed dividends and any withheld dividend tax in E-tax for businesses. Companies administered by VP Securities have a separate obligation

			to declare, in E-tax for businesses, the total dividends dis- tributed and any dividend tax withheld.
38	Amount	If the company holds some of its own shares, state here how much of the dividends declared in field 037 relates to the company's own shares. The amount cannot ex- ceed the amount in field 037.	If the company holds some of its own shares, state here how much of the dividends declared in field 037 relates to the company's own shares. Any on-account distribu- tions made for the year before the end of the fiscal year must be included. The amount cannot exceed the amount in field 037. Example: The company owns 5% of the total share capital. Dividends distributed: DKK 10,000. Distribution to own shares: DKK 500, to be entered in field 038.

## **1.5 Controlled transactions**

Field num- ber	Туре	Description	Guidance text
59	Yes:x/No:x	Has the taxable entity at any point during the year belonged to the group covered by section 37(1)(6) of the Tax Control Act concerning controlled transactions?	The group of taxable entities covered by section 37(1)(6) of the Tax Control Act on controlled transactions are le- gal entities that * exercise a controlling interest over other legal entities, * have a permanent establishment abroad, * are subject to the controlling interest of natural persons or legal entities, * are affiliated with a legal entity or * are a foreign natural person or legal entity with a per- manent establishment in Denmark, * have hydrocarbon-related business activities covered by section 21(1) or (4) of the Danish Hydrocarbon Tax Act ( <i>Kulbrinteskatteloven</i> ). Please note that this field should be answered 'Yes' if the taxable entity has been in one or more of these situations during the income year, regardless of whether the taxa- ble entity has had controlled transactions.
67	Yes:x/No:x	Has the taxable entity, during the in- come year, engaged in any controlled transactions (commer- cial or financial) covered by section 37(1)(6) of the Tax Control Act?	Information must be provided on all transactions for the entire income year.
68	Yes:x/No:x	Has there been debt to associated parties exceeding DKK 10 million, and does total liabilities including debt to associated parties amount to more than four times the taxable entity's equity?	Please note that the answer must be 'Yes' if debt to asso- ciated parties, calculated according to section 11 of the Corporation Tax Act (thin capitalisation), at some point in the income year amounted to more than DKK 10 million, and total liabilities, including debt to associated parties, at the same time amounted to more than four times the taxable entity's equity.
503	Yes:x/No:x	Does the taxable entity, together with affiliated companies, have fewer than 250 employees globally,	Answer 'Yes' if the taxable entity belongs to a group with fewer than 250 employees. The group affiliation must be assessed at the end of the income year.

		in accordance with the rules on lim- ited documentation requirements under section 40(1) of the Tax Con- trol Act?	The calculation should include the number of full-time employees in all group entities (both Danish and for-eign).
			The number of employees should be calculated as the average number of full-time employees during the year, in accordance with the official financial statements of the relevant group for the income year. See section 40(2) of the Tax Control Act and section 4(2) of the Gains on Securities and Foreign Currency Act, as well as section C.D.11.13.1.4 of our legal guide (in Danish).
503a	Yes:x/No:x	Is the group's consolidated balance sheet less than DKK 125 million?	Answer 'Yes' if, at the end of the income year, the taxable entity, belongs to a group with a consolidated balance sheet of less than DKK 125 million according to the group's official financial statements for the income year. See section 40(2) of the Tax Control Act and section 4(2) of the Gains on Securities and Foreign Currency Act, as well as section C.D.11.13.1.4 of our legal guide (in Dan- ish).
503b	Yes:x/No:x	ls the group's turnover less than DKK 250 million?	Answer Yes if, at the end of the income year, the taxable entity, belongs to a group with a total turnover of less than DKK 250 million according to the group's official fi- nancial statements for the income year. See section 40(2) of the Tax Control Act and section 4(2) of the Gains on Securities and Foreign Currency Act, as well as sec- tion C.D.11.13.1.4 of our legal guide (in Danish).
505	Amount	The exact number of entities with which there have been controlled transactions: in Denmark	An entity is an affiliated party based on the definition that controlling influence is exercised over, for example, a corporation if more than 50% of the share capital is owned or more than 50% of the votes in the corporation are controlled. A legal person can also be a tax-transpar- ent entity, such as a limited partnership (K/S) or a general partnership (I/S).
505α	Yes:x/No:x	Are all the taxable entity's con- trolled transactions with Danish entities exempt from the transfer pricing documentation requirement, as all the entities are taxed under the same set of rules, in accordance with section 39(1) of the Tax Con- trol Act?	Controlled transactions between Danish taxable entities are generally not subject to documentation requirements when the entities are taxed according to the same set of rules, for example, if both entities are subject to ordinary corporation tax, or if both entities are subject to tonnage tax. Examples of entities not taxed under the same set of rules include situations where only one party is, for in- stance, subject to tonnage tax, hydrocarbon tax, cooperative tax, association tax or is completely tax-ex- empt, while the other party is taxed according to a different set of rules. See section 39(1) of the Tax Control Act for further details. Note that if even one controlled transaction is conducted between Danish entities taxed under different sets of
506	Amount	The exact number of entities with which there have been controlled transactions: in other EU/EEA coun- tries	rules, the answer must be 'No'. An entity is an affiliated party based on the definition that controlling influence is exercised over, for example, a corporation if more than 50% of the share capital is owned or more than 50% of the votes in the corporation are controlled. A legal person can also be a tax-transpar- ent entity, such as a limited partnership (K/S) or a general partnership (I/S).

506a	Amount	The exact number of entities with which there have been controlled transactions: in other EU/EEA coun- tries, hereof permanent establishments	Specify the number of permanent establishments thereof.
507	Amount	The exact number of entities with which there have been controlled transactions: in countries outside the EU/EEA with which Denmark has a double taxation agreement	An entity is an affiliated party based on the definition that controlling influence is exercised over, for example, a corporation if more than 50% of the share capital is owned or more than 50% of the votes in the corporation are controlled. A legal person can also be a tax-transpar- ent entity, such as a limited partnership (K/S) or a general partnership (I/S).
507a	Amount	The exact number of entities in- volved in controlled transactions: in countries outside the EU/EEA with which Denmark has a double taxa- tion agreement, hereof permanent establishments	Specify the number of permanent establishments thereof.
508	Amount	The exact number of entities with which there have been controlled transactions: in countries outside the EU/EEA with which Denmark does not have a double taxation agreement	An entity is an affiliated party based on the definition that controlling influence is exercised over, for example, a corporation if more than 50% of the share capital is owned or more than 50% of the votes in the corporation are controlled. A legal person can also be a tax-transpar- ent entity, such as a limited partnership (K/S) or a general partnership (I/S).
508a	Amount	The exact number of entities with which there have been controlled transactions: in countries outside the EU/EEA with which Denmark does not have a double taxation agreement, hereof permanent es- tablishments	Specify the number of permanent establishments thereof.
509	Yes:x/No:x	Is the entity a foreign entity in the Danish joint taxation group?	

#### 1.5.1 Income statement

Field num- ber	Туре	Description	Guidance text
510a	Yes:x/No:x	Have there been controlled transac- tions involving the sale of goods and other current assets?	Sales also include transactions involving no payment.
510b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.

510d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are resident. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = additionally in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
511a	Yes:x/No:x	Have there been controlled transac- tions involving the purchasing of goods and other current assets?	Purchases also include transactions involving no pay- ment.
511b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
511d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA

		countries and/or in countries out- side the EU/EEA with which	with which Denmark has a double taxation agreement.
		Denmark has a double taxation agreement.	Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
512a	Yes:x/No:x	Have there been controlled transac- tions involving income from services, including management fees, and allocated costs?	Income from services include any allocation and distribu- tion of costs between the entities concerned, regardless of their designation, including the provision of services free of charge.
512b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
512d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
513a	Yes:x/No:x	Have there been controlled transac- tions involving expenses for services, including management fees, and allocation of costs?	Expenses for services include any allocation and distribu- tion of costs between the entities concerned, regardless of their designation, including the receipt of services free of charge
513b	Various options	Enter the gross amount (sum of transactions) 1 – (DKK 0 – DKK 1 million) 2 – (DKK >1 million – DKK 5 million) 3 – (DKK >5 million – DKK 25 mil- lion) 4 – (DKK >25 million – DKK 100	Select the appropriate interval.

		million) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million)	
		7 – (DKK >500 million – DKK 1 bil- lion) 8 – (DKK >1 billion)	
513d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
514a	Yes:x/No:x	Have there been controlled transac- tions involving rental and leasing income?	
514b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
514d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries;

		agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
515α	Yes:x/No:x	Have there been controlled transac- tions involving rental and leasing expenses?	(Empty)
515b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
515d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. EXAMPLE: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
516a	Yes:x/No:x	Have there been controlled transac- tions involving income from intangible assets?	Revenue relating to intangible assets includes royalties and similar payments for the use of rights.
516b	Various options	Enter the gross amount (sum of transactions)	Select the appropriate interval.

		1 – (DKK 0 – DKK 1 million) 2 – (DKK >1 million – DKK 5 million) 3 – (DKK >5 million – DKK 25 mil- lion) 4 – (DKK >25 million – DKK 100 mil- lion) 5 – (DKK >100 million – DKK 250 million) 6 – (DKK >250 million – DKK 500 million) 7 – (DKK >500 million – DKK 1 bil-	
		lion) 8 – (DKK >1 billion)	See the countries with which Denmark has a TP-relevant
516d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	<ul> <li>double taxation agreement (DTA) in section C.F.9 of our legal guide.</li> <li>For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where</li> <li>1 = only in Denmark;</li> <li>2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries;</li> <li>3 = also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries;</li> <li>4 = also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxation agreement.</li> <li>Evample: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.</li> </ul>
517a	Yes:x/No:x	Have there been controlled transac- tions involving expenses relating to intangible assets?	Expenses relating to intangible assets include royalties and similar payments for the use of rights.
517b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
517d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark;	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide.

		<ul> <li>also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries;</li> <li>also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries;</li> <li>also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.</li> </ul>	For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
518a	Yes:x/No:x	Have there been controlled transac- tions involving financial income?	Financial income also includes gains on financial con- tracts.
518b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
518d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.

519a	Yes:x/No:x	Have there been controlled transac- tions involving financial costs?	Financial costs also include losses related to financial contracts.
519b	Various options	Enter the gross amount (sum of transactions) 1 – (DKK 0 – DKK 1 million) 2 – (DKK >1 million – DKK 5 million) 3 – (DKK >5 million – DKK 25 mil- lion) 4 – (DKK >25 million – DKK 100 mil- lion) 5 – (DKK >100 million – DKK 250 million) 6 – (DKK >250 million – DKK 500 million) 7 – (DKK >500 million – DKK 1 bil- lion) 8 – (DKK >1 billion)	Select the appropriate interval.
519d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. EXAMPLE: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
520a	Yes:x/No:x	Have there been controlled transac- tions involving the receipt of subsidies, including debt for- giveness?	(Empty)
520b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1	Select the appropriate interval.

		billion) 8 – (DKK >1 billion)	
520d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
521a	Yes:x/No:x	Have there been controlled transac- tions involving the provision of subsidies, including debt for- giveness?	(Empty)
521b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
521d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which

		not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement. Have there been controlled transac-	Denmark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
536a	Yes:x/No:x	tions in the form of expenses for subscription of intra-group insur- ance? Enter the gross amount (sum of	(Empty)
536b	Various options	transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
536d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
537a	Yes:x/No:x	Have there been controlled transac- tions in the form of income from the subscription of intra-group insur- ance?	(Empty)
537b	Various options	Enter the gross amount (sum of transactions) 1 – (DKK 0 – DKK 1 million) 2 – (DKK >1 million – DKK 5 million)	Select the appropriate interval.

		3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	
537d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2= also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
522a	Yes:x/No:x	Have there been controlled transac- tions involving other income?	Other income includes, for example, income relating to the disposal of activities, decommissioning, or restructur- ing.
522b	Various options	Enter the gross amount (sum of transactions) 1 – (DKK 0 – DKK 1 million) 2 – (DKK >1 million – DKK 5 million) 3 – (DKK >5 million – DKK 25 mil- lion) 4 – (DKK >25 million – DKK 100 mil- lion) 5 – (DKK >100 million – DKK 250 million) 6 – (DKK >250 million – DKK 500 million) 7 – (DKK >500 million – DKK 1 bil- lion) 8 – (DKK >1 billion)	Select the appropriate interval.
522d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries;	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where

		<ul> <li>also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries;</li> <li>also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.</li> </ul>	<ul> <li>1 = only in Denmark;</li> <li>2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries;</li> <li>3 = also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries;</li> <li>4 = also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement.</li> <li>Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.</li> </ul>
523a	Yes:x/No:x	Have there been controlled transac- tions involving other expenses?	Other expenses include, for example, expenses relating to the acquisition of activities, decommissioning, orre- structuring.
523b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
523d	Various options	Which countries have been involved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxa- tion agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.

#### 1.5.2 Balance sheet

Field num- ber	Туре	Description	Guidance text
524a	Yes:x/No:x	Have there been controlled trans- actions involving the sale of intangible assets?	Sales of intangible assets include both assets acquired for consideration and sales of proprietary research and development results, regardless of whether the costs in- curred have been capitalised or expensed. Sales also include transfers without consideration.
524b	Various options	Enter the gross amount (sum of transactions) 1 – (DKK 0 – DKK 1 million) 2 – (DKK >1 million – DKK 5 million) 3 – (DKK >5 million – DKK 25 mil- lion) 4 – (DKK >25 million – DKK 100 mil- lion) 5 – (DKK >100 million – DKK 250 million) 6 – (DKK >250 million – DKK 500 million) 7 – (DKK >500 million – DKK 1 bil- lion) 8 – (DKK >1 billion)	Select the appropriate interval.
524d	Various options	Which countries have been in- volved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double tax- ation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specifcy the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. EXAMPLE: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
525a	Yes:x/No:x	Have there been controlled trans- actions involving the purchase of intangible assets?	Purchases also include transfers without consideration.
525b	Various options	Enter the gross amount (sum of transactions) 1 – (DKK 0 – DKK 1 million) 2 – (DKK >1 million – DKK 5 million) 3 – (DKK >5 million – DKK 25 mil- lion) 4 – (DKK >25 million – DKK 100 mil- lion)	Select the appropriate interval.

		5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion) Which countries have been in- volved in the controlled transactions in question:	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide.
525d	Various options	<ul> <li>only in Denmark;</li> <li>also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries;</li> <li>also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries;</li> <li>also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double tax- ation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.</li> </ul>	For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
526a	Yes:x/No:x	Have there been controlled trans- actions involving the sale of property, plant and equipment?	Sales also include transfers without consideration.
526b	Various options	Enter the gross amount (sum of transactions) 1 – (DKK 0 – DKK 1 million) 2 – (DKK >1 million – DKK 5 million) 3 – (DKK >5 million – DKK 25 mil- lion) 4 – (DKK >25 million – DKK 100 mil- lion) 5 – (DKK >100 million – DKK 250 million) 6 – (DKK >250 million – DKK 500 million) 7 – (DKK >500 million – DKK 1 bil- lion) 8 – (DKK >1 billion)	Select the appropriate interval.
526d	Various options	Which countries have been in- volved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which

		Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double tax- ation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement. Have there been controlled trans-	Denmark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
527a	Yes:x/No:x	actions involving the purchase of property, plant and equipment?	Purchases also include transfers without consideration.
527b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
527d	Various options	Which countries have been in- volved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double tax- ation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
528a	Yes:x/No:x	Have there been controlled trans- actions involving the sale of equity interests in group enterprises?	Sales include transfers without consideration. Sales of equity interests also include cessation of business through the intra-group taxable merger of group enter- prises in which equity interests are held.
	Various	Enter the gross amount (sum of	

			1
		1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	
528d	Various options	Which countries have been in- volved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double tax- ation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
529a	Yes:x/No:x	Have there been controlled trans- actions involving the purchase of equity interests in group enter- prises?	Purchases also include transfers without consideration.
529b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
529d	Various options	Which countries have been in- volved in the controlled transactions in question:	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide.

		<ul> <li>only in Denmark;</li> <li>also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries;</li> <li>also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries;</li> <li>also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double tax- ation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out-</li> </ul>	For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement.
		side the EU/EEA with which Denmark has a double taxation agreement.	Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
530a	Yes:x/No:x	Have there been controlled trans- actions involving the selling of fixed asset investments?	Sales also include transfers without consideration.
530b	Various options	Enter the gross amount (sum of transactions) 1 – (DKK 0 – DKK 1 million) 2 – (DKK >1 million – DKK 5 million) 3 – (DKK >5 million – DKK 25 mil- lion) 4 – (DKK >25 million – DKK 100 mil- lion) 5 – (DKK >100 million – DKK 250 million) 6 – (DKK >250 million – DKK 500 million) 7 – (DKK >500 million – DKK 1 bil- lion) 8 – (DKK >1 billion)	Select the appropriate interval.
530d	Various options	Which countries have been in- volved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double tax- ation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. EXAMPLE: In case of transactions with related parties in

		Denmark has a double taxation agreement.	Denmark and Iran, tick 'also in countries outside the EU/EEA'.
531a	Yes:x/No:x	Have there been controlled trans- actions involving the purchasing of fixed asset investments in general?	Purchases also include transfers without consideration.
531b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
531d	Various options	Which countries have been in- volved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double tax- ation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
532a	Yes:x/No:x	Have loans been received from le- gal entities or individuals covered by the rules on controlled transac- tions?	The total maximum loan is calculated as the sum of the maximum loan per entity on the day in the income year with the highest loan amount in relation to the individual entity.
532aa	Various options	Is the loan from individuals or legal entities?	Legal entities are all types of companies, including part- nerships etc., foundations, estates, municipalities, and public authorities.
532b	Various options	Enter the gross amount (sum of transactions) 1 – (DKK 0 – DKK 1 million) 2 – (DKK >1 million – DKK 5 million) 3 – (DKK >5 million – DKK 25 mil- lion) 4 – (DKK >25 million – DKK 100 mil- lion)	Select the appropriate interval.

		5 – (DKK >100 million – DKK 250 million) 6 – (DKK >250 million – DKK 500 million) 7 – (DKK >500 million – DKK 1 bil- lion) 8 – (DKK >1 billion)	
532d	Various options	Which countries have been in- volved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double tax- ation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
533a	Yes:x/No:x	Have loans been extended to legal entities or individuals covered by the rules on controlled transac- tions?	The total maximum loan is calculated as the sum of the maximum loan per entity on the day in the income year with the highest loan amount in relation to the individual entity.
533aa	Various options	Are the loans from individuals or le- gal entities?	Legal entities are all types of companies, including part- nerships etc., foundations, estates, municipalities, and public authorities.
533b	Various options	Enter the gross amount (sum of transactions) 1 – (DKK 0 – DKK 1 million) 2 – (DKK >1 million – DKK 5 million) 3 – (DKK >5 million – DKK 25 mil- lion) 4 – (DKK >25 million – DKK 100 mil- lion) 5 – (DKK >100 million – DKK 250 million) 6 – (DKK >250 million – DKK 500 million) 7 – (DKK >500 million – DKK 1 bil- lion) 8 – (DKK >1 billion)	Select the appropriate interval.
533d	Various options	Which countries have been in- volved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries;	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where

		<ul> <li>also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries;</li> <li>also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double tax- ation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.</li> </ul>	<ul> <li>1 = only in Denmark;</li> <li>2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries;</li> <li>3 = also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries;</li> <li>4 = also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark in other EU/EEA countries outside the EU/EEA with which Denmark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement.</li> <li>Example: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.</li> </ul>
534a	Yes:x/No:x	actions involving the provision of other financing, including financial contracts?	Financial contracts include options, futures, forward con- tracts, swaps, and forward rate agreements.
534b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
534d	Various options	Which countries have been in- volved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double tax- ation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. EXAMPLE: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.

535a	Yes:x/No:x	Have there been controlled trans- actions involving the receipt of other financing, including financial contracts?	Financial contracts include options, futures, forward con- tracts, swaps, and forward rate agreements.
535b	Various options	Enter the gross amount (sum of transactions) 1 - (DKK 0 - DKK 1 million) 2 - (DKK >1 million - DKK 5 million) 3 - (DKK >5 million - DKK 25 mil- lion) 4 - (DKK >25 million - DKK 100 mil- lion) 5 - (DKK >100 million - DKK 250 million) 6 - (DKK >250 million - DKK 500 million) 7 - (DKK >500 million - DKK 1 bil- lion) 8 - (DKK >1 billion)	Select the appropriate interval.
535d	Various options	Which countries have been in- volved in the controlled transactions in question: - only in Denmark; - also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark has a TP-relevant double taxation agree- ment, meaning possibly also in Denmark and/or in other EU/EEA countries; - also in countries outside the EU/EEA with which Denmark does not have a TP-relevant double tax- ation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries out- side the EU/EEA with which Denmark has a double taxation agreement.	See the countries with which Denmark has a TP-relevant double taxation agreement (DTA) in section C.F.9 of our legal guide. For each type, specify the country/countries in which the entities involved in the controlled transactions in question are registered. Tick one of 1, 2, 3 or 4, where 1 = only in Denmark; 2 = also in the EU/EEA, meaning also in Denmark and/or other EU/EEA countries; 3 = also in countries outside the EU/EEA with which Den- mark has a TP-relevant double taxation agreement, meaning possibly also in Denmark and/or in other EU/EEA countries; 4 = also in countries outside the EU/EEA with which Den- mark does not have a TP-relevant double taxation agreement, meaning possibly also in Denmark, in other EU/EEA countries and/or in countries outside the EU/EEA with which Denmark has a double taxation agreement. EXAMPLE: In case of transactions with related parties in Denmark and Iran, tick 'also in countries outside the EU/EEA'.
539	Yes:x/No:x	Did all the controlled transactions, see field 67, consist of declared dividends (received or distrib- uted)?	Answer 'Yes' if the taxpayer has received or distributed declared dividends from/to the group of persons cov- ered by section 37 of the Tax Control Act during the income year, and if this is the taxpayer's only type of con- trolled transaction. You can read more about this in section C.D.11.12 of our legal guide.

#### **1.5.3 International disclosures**

Field num- ber	Туре	Description	Guidance text
538	Yes:x/No:x	Have payments been made to re- cipients who are tax resident in blacklisted countries, see section 5H of the Tax Assessment Act?	Answer Yes if payments have been made to recipients who are resident for tax purposes in blacklisted coun- tries, see section 5H of the Tax Assessment Act.

540	Yes:x/No:x	Is the company part of a group that has had an annual turnover of over EUR 750 million within the last four years?	
540a	Yes:x/No:x	Is the company a group entity etc. subject to tax liability according to the Danish Minimum Taxation Act ( <i>Minimumsbeskatningsloven</i> ) (Global Minimum Taxation (GloBE) for groups with a turnover of more than EUR 750 million annually in at least two out of the last four fiscal years)?	The Danish Minimum Taxation Act (GloBE) applies to group entities and permanent establishments that are part of a group with an annual turnover of more than EUR 750 million in at least two out of the four fiscal years im- mediately preceding the reference fiscal year, as well as entities that are members of a joint venture that would be included in a group if it met the conditions for financial consolidation and thus qualified as a group entity.

## 1.6 Reduced interest deduction

Field number	Туре	Description	Guidance text
195	Yes:x/No:x	Is the right to deduct the com- pany's net finance costs limited according to section 11B or sec- tion 11C of the Corporation Tax Act?	The field is mandatory and must be answered with Yes or No. The management company must calculate the reduced deduction for the group of jointly taxed companies as a whole. If the company's/group of jointly taxed companies' net finance costs do not exceed DKK 21,300,000, the de- duction is not reduced according to section 11B of the Corporation Tax Act. Please note that the amount of DKK 21,300,000 must be adjusted if joint taxation is estab- lished/terminated or tax liability commences/ceases during the income year, and in the case of compa- nies/groups of jointly taxed companies' net finance costs do not exceed DKK 22,313,400, the de- duction will not be reduced according to section 11B of the Corporation Tax Act. Please note that the amount of DKK 22,313,400 must be adjusted if joint taxation is es- tablished/terminated or tax liability commences/ceases during the income year, and in the case of compa- nies/groups of jointly taxed companies' net finance costs do not exceed DKK 22,313,400, the de- duction will not be reduced according to section 11B of the Corporation Tax Act. Please note that the amount of DKK 22,313,400 must be adjusted if joint taxation is es- tablished/terminated or tax liability commences/ceases during the income year, and in the case of compa- nies/groups of jointly taxed companies liable to pay tonnage tax. Answer Yes if the company's net finance costs are to be limited. Management companies must answer Yes if the overall calculation shows that one or more of the jointly taxed companies' deductible net finance costs are to be limited.
196	Amount	The company's net finance costs, see section 11B(4) of the Corpo- ration Tax Act	If the answer is Yes in field 195, this field must be filled in. The amount must be entered without plus or minus signs. If the company is a management company, net finance costs for the whole group of jointly taxed companies must be entered in field 196.
197	Amount	Tax value of the company's as- sets, see section 11B(5) of the Corporation Tax Act	If the answer is Yes in field 195, this field must be filled in. The amount must be entered without plus or minus signs. If the company is a management company, the total tax value of the assets of the whole group of jointly taxed companies at the end of the income year is included in field 197.

198	Amount	EBITDA balance to be carried for-	The amount must include reduced net finance costs that can be carried forward to subsequent income years.
170	Amouni	ward	The total amount of such costs is carried forward for the jointly taxed companies

# 1.7 Adjustment for loss carryforward

Field number	Туре	Description	Guidance text
161	Yes:x/No:x	Are there any events during the year that affect the company's loss carryforward?	The field is mandatory and must be answered with Yes or No. Answer Yes if there have been one or more events during the year that may affect the company's loss car- ryforward. Such events include, for example, debt forgiveness and composition, change of ownership, ex- emption for losses for the year or previous years, certain mergers, or if the company is liable to pay tax according to section 2(1) of the Corporation Tax Act. An exhaustive checklist will appear if Yes.
161a	Yes:x/No:x	The company has obtained a compulsory composition, see sec- tion 12A(1) of the Corporation Tax Act	Mark this if a restructuring of the company has resulted in a compulsory composition during the income year, and unutilised losses allowed for carryforward and de- ductible losses are to be reduced. The reduction takes effect for the income year in which the proposed restructuring with the compulsory compo- sition is confirmed and for subsequent income years.
161b	Yes:x/No:x	The company has been granted debt forgiveness, see section 12B of the Corporation Tax Act	Mark this when an agreement has been entered into on an overall arrangement between a debtor company and its creditors on the cancellation or reduction of the com- pany's debt (voluntary composition).
161c	Yes:x/No:x	Have tax losses and losses al- lowed for carryforward been reduced according to section 12A(2) of the Corporation Tax Act?	If, for example, the restructuring of a company etc. re- sults in a compulsory composition in an income year, unutilised losses allowed for carryforward and then losses allowed for carryforward are reduced. See sec- tion 12A(1), section 12B and section 12C of the Corporation Tax Act.
161d	Yes:x/No:x	The creditor has converted its re- ceivable into shares in the company (debt conversion), see section 12A(3) of the Corporation Tax Act	Mark this if there has been a full or partial conversion of debt to shares or convertible bonds. The loss is reduced by the amount by which the nominal value of the converted claim exceeds the market value of the converted claim at the time of conversion.
161e	Yes:x/No:x	The company's debt has been re- duced or repaid in connection with a cash capital injection or a grant, see section 12C of the Cor- poration Tax Act	Mark this if a claim has been reduced or repaid by a cash capital injection or grant according to section 31D of the Corporation Tax Act. Unutilised losses allowed for carryforward and deducti- ble losses allowed for carryforward are reduced according to the rules in section 12A(1) of the Corpora- tion Tax Act.

161f	Yes:x/No:x	A change of ownership of the company has taken place involv- ing more than 50% of the capital or votes, see section 12D of the Corporation Tax Act	Mark this if more than 50% of the share capital or more than 50% of the voting rights in the company at the end of the income year are owned by other shareholders or participants compared to the beginning of a previous in- come year in which the taxable income showed a loss. The company must itself take into account the reduced or lost carryforward option for previous years' losses in the legal provision. For groups of jointly taxed compa- nies, this obligation rests with the management company.
161g	Yes:x/No:x	The company has participated in a tax-free restructuring and there is a loss in the period from the date of restructuring until the date on which the restructuring was adopted in all the participating companies (the interim period), see section 8(7) of the Danish Merger Tax Act ( <i>Fusionsskatte- loven</i> )	Mark this if a loss has arisen in the interim period in con- nection with a merger, see section 8(7) of the Merger Tax Act. For groups of jointly taxed companies, this obli- gation rests with the management company.
161h	Yes:x/No:x	The company is liable to pay tax, see section 2(1)(a) of the Corpo- ration Tax Act (permanent business establishment) as part of a group of jointly taxed compa- nies, and losses can be carried forward abroad, see sections 8C to 8E of the Corporation Tax Act	Must be marked by companies etc. that are liable to pay tax according to section 2(1) of the Corporation Tax Act and by the management company. When carrying forward losses and updating the loss reg- ister, the management company must pay attention to the special rules for loss carryforward applying to this type of company. The management company must declare the subsidi- ary's/branch's actual loss for the year by entering 0 in field 076 and contacting the Tax Agency to have the subsidiary's/branch's actual loss registered in the loss register, with the correct right of use, so that the loss can only be carried forward by the subsidiary/branch itself. The management company cannot register income and losses digitally for the subsidiary/branch.
161i	Yes:x/No:x	The company is a contributor to a tax-free restructuring (full division, partial division, transfer of assets) where one or more of the recipi- ent companies is a foreign company that is not part of a cho- sen international group of jointly taxed companies	It must be marked with Yes or No. Answer Yes if the com- pany is a contributor to a tax-free restructuring (full division, partial division, transfer of assets) where one or more of the recipient companies is a foreign company that is not part of a chosen international group of jointly taxed companies
161ia	Text	Recipient's CVR/SE no.	CVR/SE no. of the recipient. A foreign recipient that is not part of an international group of jointly taxed companies is stated as: Foreign recipient. The information is from the recipient's reporting of the restructuring.
161ib	Date	Date of restructuring	The date is taken from the recipient's reporting of the re- structuring.
161ic	Amount	Enter the percentage share of previous years' losses transferred to the recipient	If the answer is Yes in field 161i, this field must be filled in. The company should enter the percentage share re- flecting the percentage share of the company's loss allowed for carryforward that has been transferred to the recipient company. If the recipient has stated a percentage share when re- porting the restructuring, this amount will be pre-filled in the field. This amount can be overwritten if it is not cor- rect.

161j	Yes:x/No:x	The company is a contributor to a tax-free restructuring (full division, partial division, transfer of assets) where the contributor and recipi- ent are not jointly taxed at the time of restructuring	It must be marked with Yes or No. Answer Yes if the com- pany is a contributor to a tax-free restructuring (full division, partial division, transfer of assets) where the contributor and recipient are not jointly taxed at the time of restructuring.
161ja	Text	Recipient's CVR/SE no.	CVR/SE no. of the recipient. The information is taken from the recipient's reporting of the restructuring.
161jb	Date	Date of restructuring	The date is taken from the recipient's reporting of the re- structuring.
161jc	Amount	Enter the percentage share of previous years' losses transferred to the recipient	If field 161j is filled in, this field must be filled in. The com- pany should enter the percentage share reflecting the percentage share of the company's loss allowed for car- ryforward that has been transferred to the recipient company. If the recipient has stated a percentage share when re- porting the restructuring, this amount will be pre-filled in the field. This amount can be overwritten if it is not cor- rect.
161k	Yes:x/No:x	The company wishes to disregard the carryforward of losses, see section 33H of the Tax Assess- ment Act	Mark this if losses are disregarded according to the rules in section 33H of the Tax Assessment Act in the company or in the group of jointly taxed companies for which the company is the management company. The company etc. must itself ensure compliance with the rules when declaring income and updating the loss reg- ister.
161Ка	Amount	The disregarded loss from previ- ous years or the year's loss, see section 33H of the Tax Assess- ment Act	Report losses disregarded according to the rules in sec- tion 33H of the Tax Assessment Act in the company or in the group of jointly taxed companies for which the com- pany is the management company. The company etc. is responsible for compliance with the rules when declaring its taxable income and having the loss register updated. The company is requested to attach enclosures showing a calculation of the taxable income according to the rules in section 33H of the Tax Assessment Act, including a specification of disregarded losses for the income year, when choosing the rules in section 33H of the Tax Assessment Act. The company registers disregarded losses in the loss register via tab 3 of the tax return. Any loss for the year that is disregarded must be entered in the loss register as incurred in that year. If losses from previous income years are disregarded, the balance for the current year's loss must be increased at the end of the period in the loss register, for later use. The numerical value must be reported without plus or minus signs.

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161L	Yes:x/No:x	The company wishes to disregard the carryforward of losses, see section 31(9) of the Corporation Tax Act	Mark this if losses are disregarded according to the rules in section 31(9) of the Corporation Tax Act for the group of jointly taxed companies for which the company is the management company. The company etc. must itself en- sure compliance with the rules when declaring income and updating the loss register. When carrying forward losses and updating the loss reg- ister, the management company must pay attention to the special rules for loss carryforward applying to this type of company. The management company must report the subsidi- ary's/branch's actual loss for the year as 0 in field 076 and contact the Tax Agency in order to have the subsidi- ary's/branch's actual loss registered in the loss register. The management company cannot register income and losses digitally for the subsidiary/branch. The Tax Agency is working to make this possible in the future.
161m	Yes:x/No:x	The taxpayer wishes to declare in- formation with loss limitation, see section 12(2) of the Corporation Tax Act.	Mark this field if the taxpayer has entered information with loss limitation, see section 12(2) of the Corporation Tax Act.
161n	Yes:x/No:x	Has debt reduction taken place according to section 12A(4) of the Corporation Tax Act?	Answer Yes if consolidated companies or shareholders in the common shareholder group directly or indirectly acquire a claim on a debtor company from a creditor not consolidated with the debtor company or part of the common shareholder group. This corresponds to a debt reduction, and in these cases the loss is reduced, see section 12(4) of the Corporation Tax Act.
165	Yes:x/No:x	Has the company withdrawn from international joint taxation?	The answer must be Yes or No. Answer Yes - in the first income year or sub-period in which the company has withdrawn from international joint taxation. Answer No - for all other income years/sub-periods. Withdrawal from international joint taxation can take place either together with the entire group or if the com- pany is no longer part of the group. For more information on the rules, see section 31A of the Corporation Tax Act.
165α	Yes:x/No:x	Does the company have perma- nent business establishments or real property abroad with residual losses that cannot be carried for- ward for set-off in later income years, see section 31A(2), third sentence, of the Cor- poration Tax Act? If Yes – click on the question mark for additional instructions.	The answer must be Yes or No if 165 is a Yes. Select Yes in this field 165a – if the company etc. has re- sidual losses attributable to the company's foreign permanent business establishments and properties. If Yes, this residual loss must be removed via the year/sub-period's loss register. The removal of these residual losses must be distributed over the income years/sub-periods in which the residual loss arose. If the company is now separately taxed, these residual losses must be removed in the company's own tax re- turn for the year/sub-period. If the company is part of a group of jointly taxed compa- nies, these residual losses must be removed by the management company via the company's loss register with the management company. That is why you should remember to notify the management company.

166	Yes:x/No:x	Has a mutual agreement been en- tered into covered by section 12B of the Tax Assessment Act?	If a mutual agreement has been entered into on the transfer of one or more assets, where all or some of the consideration takes the form of regular payments, an- swer Yes. Regular payments is when there is uncertainty about the duration of the payments or the annual amount when the payments run beyond the year of the agreement.
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For entities covered by section 1(1)(6) of the Corporation Tax Act only fields 161, 161a, 161b, 161c, 161k and 161m are shown.

# 1.8 Information about specific events

Field number	Туре	Description	Guidance text
162a	Yes:x/No:x	Has a tax-free exchange of shares been carried out?	The answer must be Yes or No. Answer Yes if a tax-free exchange of shares has been carried out during the income year.
164	Yes:x/No:x	Has an unauthorised tax-free re- structuring been carried out?	The answer must be Yes or No. Answer Yes if an unau- thorised tax-free restructuring has been carried out during the income year.
162b	Yes:x/No:x	Has a taxable restructuring been carried out?	The answer must be Yes or No. Answer Yes if a taxable restructuring has been carried out during the income year.
162c	Yes:x/No:x	Has a business activity been pur- chased/sold?	The answer must be Yes or No. Answer Yes if a business activity has been bought or sold in the income year.
163a	Yes:x/No:x	Have intangible assets (goodwill etc.) been purchased/received?	The answer must be Yes or No. Answer Yes if intangible assets (goodwill etc.) have been purchased/received during the income year.
163aa	Amount	Declare the gross value of the in- tangible assets purchased/received,	If field 163a is a Yes, this field must be filled in with the gross value of the assets purchased/received.
163ab	Amount	of which intra-group	If field 163a is a Yes, this field must be filled in with the value of the assets purchased/received from a party with which the company is consolidated.
163b	Yes:x/No:x	Have intangible assets (goodwill etc.) been sold/transferred?	The answer must be Yes or No. Answer Yes if intangible assets (goodwill etc.) have been sold/transferred during the income year.
163ba	Amount	Declare the gross value of the in- tangible assets sold/transferred,	If field 163b is a Yes, this field must be filled in with the gross value of the assets sold/transferred.
163bb	Amount	of which intra-group	If field 163b is a Yes, this field must be filled in with the value of the assets sold/transferred to a party with which the company is consolidated.

167	Yes:x/No:x	Has a request/reinvestment of profit from sale of real property been made?	<ul> <li>Answer Yes if reinvestment in real property has taken place, been made or requested. The reinvestment of profit from sale of real property in another property is conditional on the owner providing certain information about the sold property and the acquired property, respectively, to the Tax Agency at the time of requesting reinvestment. The document requesting reinvestment must contain the following:</li> <li>Indication that profit from sale of real property has been reinvested in real property in Denmark.</li> <li>Identification of the real property in which the profit has been reinvested.</li> <li>The amount of the reinvested profit</li> <li>Identification of the sold real property.</li> <li>At the request of the Tax Agency, the owner must be able to provide, among other things, information about the basis for the calculated profit and documentation that the conditions for reinvestment are met.</li> <li>Read more in section C.H.2.1.11.2 of our legal guide.</li> </ul>
157	Yes:x/No:x	Has the taxpayer sold a property covered by the Danish Act on Tax- ation of Profit from Sale of Real Property ( <i>Ejendomsavance-</i> <i>beskatningsloven</i> ), see section 6D of that Act?	Answer Yes if the company has sold a property and cho- sen for some of the profit to be taxed according to the rules in section 6D of the Act on Taxation of Profit from Sale of Real Property. Application of the rules is condi- tional on the company notifying the Tax Agency. The notification must be given no later than at the same time as the deadline for submission of the tax return for the income year in which the property was sold. The company must submit a copy of the purchase- money mortgage and information about the taxable profit, see section 6. The submitted information must in- clude a statement of the profit chosen to be included in the following income years (maximum 10% of the cash converted sales price for the property), the annual amount and the number of years over which the profit is included (maximum 10 years, after the sale). See further conditions to be complied with in section 6D(2) of the Danish Property Taxation Act ( <i>Ejendomsbeskatnings- loven</i> ).
157α	Yes:x/No:x	Have there been any events dur- ing the year resulting in the remaining deferred profit having to be included in the calculation of the taxable income, see section 6D(3) of the Act on Taxation of Profit from Sale of Real Property?	Answer Yes if an event has occurred causing the remain- ing deferred profit to have to be included in the calculation of taxable income. The deferred profit must be included in the calculation of taxable income in the event of: - full or partial sale of the property or a change of use so that it is no longer used commercially in whole or in part - full or partial disposal or redemption of the purchase- money mortgage - the seller's death, except as set out in section 6D(4) - termination of the seller's tax liability, see section 10 of the Danish Withholding Tax Act ( <i>Kildeskatteloven</i> ) or section 5(7) of the Corporation Tax Act.

157b	Amount	Moratorium balance covered by section 6D of the Act on Taxation of Profit from Sale of Real Property.	State here the moratorium balance covered by section 6D of the Act on Taxation of Profit from Sale of Real Property, see section 6D(14) of that Act.
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Fields 157, 157a and 157b apply only to entities covered by section 1(1)(6) of the Corporation Tax Act.

# 1.9 Special income disclosures

Field number	Туре	Description	Guidance text
069	Yes:x/No:x	Is the company covered by sec- tions 8C-8E of the Corporation Tax Act?	Sections 8C-8Eof the Corporation Tax Act are rules pro- tecting against hybrid mismatch situations ('double deduction' or 'deduction without inclusion') arisingfrom payments in connection with the use of hybrid financial instruments and hybrid entities etc., where, for example, the same expense can be deducted bothin Denmark and abroad, or where deductibility in Denmark is not matched by a corresponding tax liability abroad. The hy- brid mismatch situation can arise from payments between 'affiliates' and in the context of 'structured ar- rangements'. Read more about this in section C.D.2.4.7 of our legal guide.
066	Yes:x/No:x	Is the company covered by the CFC rules, see section 32 of the Corporation Tax Act, or does it use the partial substance test?	CFC stands for Controlled Foreign Company. CFC in- come constitutes income from Danish and foreign companies controlled by the taxpayer, as referred to in section 32 of the Corporation Tax Act. See section C.D.4 of our legal guide on CFC taxation and private equity partners (carried interest) on CFC taxation of companies, foundations, persons, estates of deceased persons and private equity partners. Our Danish-language legal guide:
066α	Amount	Declare the company's CFC in- come	The amount of the company's CFC income is stated here. If the CFC income is positive, the amount is stated. If the CFC income has been offset against losses or reductions for Danish or foreign taxes, enter 0. All income from intangible assets other than royalties, see section 32(5) para (3)(b), second sentence, of the Corporation Tax Act, is not to be included if the company has applied the partial substance test. Remember to attach a separate statement as an appen- dix under 'Selskabsskatteloven § 5B og § 19' (Sections 5B and 16 of the Corporation Tax Act), to be selected in the drop-down menu for the tax return.
066αα	Yes:x/No:x	Has the parent company chosen to include only the subsidiary's CFC income in the income state- ment according to section 32(15) of the Corporation Tax Act?	According to section 32(15) of the Corporation Tax Act, the company may choose to include only the subsidi- ary's CFC income in the income statement instead of applying the main rule under which the full income should be included. The choice, binding for five income years, applies to all the parent company's subsidiaries, see section 32(16) of the Corporation Tax Act. See also section 32(15) and (16) of the Corporation Tax Act and section C.D.4.1.6 of our legal guide on the parent com- pany's income statement, under the heading 'Valg om kun at blive beskattet af CFC-indkomsten, SEL §32, stk. 15' (Choice of taxation only on the CFC income, section 32(15) of the Corporation Tax Act).

066ab	Yes:x/No:x	Has the CFC income from subsidi- aries etc. been offset against losses carried forward/trans- ferred from other jointly taxed companies etc. according to sec- tion 32(9) of the Corporation Tax Act?	According to section 32(9) of the Corporation Tax Act. The parent company's income statement includes the subsidiary's loss carried forward. The same applies to losses transferred from other companies as part of a joint taxation scheme or another set of rules whereby losses can be transferred. However, the subsidiary's losses carried forward and transferred may be included at a maximum amount corresponding to the loss calcu- lated according to Danish rules. Section 33H of the Tax Assessment Act applies correspondingly to the parent company's own losses, which cannot be offset against the subsidiary's income. *According to section 32(9) of the Corporation Tax Act. The CFC can carry forward its own losses, and if the CFC is part of a mandatory Danish joint taxation scheme, losses can offset the CFC income if they have been transferred from other companies as part of a joint taxa- tion scheme or another set of rules under which losses can be transferred. However, the subsidiary's losses car- ried forward and transferred may be included at a maximum amount corresponding to the loss calculated according to Danish rules. Section 33H of the Tax As- sessment Act applies correspondingly to the parent company's own losses, which cannot be offset against the subsidiary's income. For a parent company subject to wealth tax, the CFC in- come is charged separately at the rate of 22% according to section 19(1) of the Corporation Tax Act. 2. As this is a separate tax, the separate CFC taxation is re- duced by Danish or foreign taxes paid, according to section 32(11) of the Corporation Tax Act. The CFC in- come is offset at the same tax rate and under the same rules.
066b	Yes:x/No:x	Has the company applied the par- tial substance test?	No other income from intangible assets is included in the CFC income if, according to the Danish Executive Order on Partial Substance Test ( <i>Bekendtgørelse om partiel</i> <i>substanstest</i> ), it is documented that the entity has ap- plied the partial substance test and is in fact engaged in a significant economic activity in relation to the intangi- ble assets. See also section C.D.4.1.5.2.2.2.4 of our legal guide 'Betingelser for at anvende den partielle substanstest' (Conditions for applying the partial substance test)
066Radd	Repeti- tions	Add entity	
066RRe- move	Repeti- tions	Remove	
066c	Text	Name	(Empty)
066d		1	

	Γ		
			State or non-state jurisdiction with tax autonomy.
066e	Choice	Tax jurisdiction	If a group entity is resident in more than one tax jurisdic- tion, the general principles for determining the applicable double taxation agreement are used to deter- mine the jurisdiction in which the entity is resident for tax purposes. If there is no applicable double taxation agreement, the group entity is reported in the tax juris- diction of the management's actual domicile. The actual management domicile is determined on the basis of in- ternationally agreed standards.
066f	Amount	CVR/SE number/TIN number	TIN is short for Tax Identification Number. For Danish entities, it will be the CVR/SE number.
70	Yes:x/No:x	Has the taxpayer covered by sec- tion 13J(1) of the Corporation Tax Act received income or profit ac- cording to under section 2(1)(b) of the Corporation Tax Act?	To be filled in if the taxpayer is a pension provider cov- ered by section 13J of the Corporation Tax Act and has received income from real property located in Denmark or profit from the sale of real property covered by the Tax on Profit from Sale of Real Property Act or section 21 of the Depreciation Act.
90	Yes:x/No:x	Has deduction been claimed for final losses in a foreign subsidi- ary/permanent business establishment/real property, see section 31E of the Corporation Tax Act?	The field is mandatory and must be filled in with Yes or No. Answer Yes if the taxpayer has deducted a final loss in a foreign subsidiary/permanent business establish- ment/real property, see section 31E of the Corporation Tax Act.
090a	Amount	The amount of total deduction for final losses.	The field is mandatory and must be filled in with the amount if the answer to the previous field 090 is Yes. State here the total amount deducted in respect of final losses in a foreign subsidiary/permanent business es- tablishment/real property, according to section 31E of the Corporation Tax Act.
108a	Yes:x/No:x	Has the company claimed an in- creased deduction, see section 6(1)(3), second and third sen- tences, of the Depreciation Act?	The field is mandatory and must be filled in with Yes or No. Answer Yes if the company has claimed an in- creased deduction either added to the operating equipment account balance or written off in the income year.
108b	Amount	Declare the actual acquisition cost affected by section 6(1)(3), second and third sentences, of the Depreciation Act.	If the answer is Yes in field 108a, this field must be filled in. In the field, enter the amount on which the deduc- tion/amortisation/depreciation is based. The amount must be entered without plus or minus signs.
109a	Yes:x/No:x	Has the company claimed an in- creased deduction, see section 8B(4), first and second sentences, of the Tax Assessment Act?	The field is mandatory and must be filled in with Yes or No. Answer Yes if the company has claimed and in- creased deduction/amortisation of research expenses incurred during the income year.
109b	Amount	Declare the expenses actually in- curred that are affected by section 8B(4), first and second sentences, of the Tax Assessment Act.	If the answer is Yes in field 109a, this field must be filled in. In the field, enter the amount on which the deduc- tion/amortisation/depreciation is based. The amount must be entered without plus or minus signs.
110a	Yes:x/No:x	Has the company claimed an in- creased deduction, see section 5D of the Depreciation Act.	The field is mandatory and must be filled in with Yes or No. Answer Yes if the company has claimed an in- creased deduction as a separate balance.
110b	Amount	State the actual acquisition cost affected by section 5D of the De- preciation Act on increased	If the answer is Yes in field 110a, this field must be filled in. In the field, enter the amount that is the basis for the

		depreciation of plant and machin- ery.	deduction. The amount must be entered without plus or minus signs.
310a	Yes:x/No:x	Has the company generated in- come subject to tonnage tax as an operator during the reporting period?	Even though the company is bound by a 10-year lock-in period, the company may, for example, generate income subject to tonnage tax in years 1, 2 and 3, after which the company relinquishes full responsibility for the ship's operation as well as all obligations and responsibilities according to the ISM Code. In years 4 and 5, the com- pany only has ordinary taxable income. If, in year 6, the company again assumes full responsibility as well as all obligations and responsibilities under the ISM Code for a ship's operation, the company will be covered by the tonnage tax scheme due to the ongoing 10-year lock-in period, and the income from the ship must be calculated according to the Danish Tonnage Tax Act ( <i>Tonnageskat- teloven</i> ).

Fields 110a, 110b and 310a apply only to entities covered by section 1(1)(1) of the Corporation Tax Act.

### **1.9.1** Income subject to tonnage tax and accounting figures

Field number	Туре	Description	Guidance text
316	16 Amount Tonnage income, see section 15(1) of the Tonnage Tax Act (must be stated in DKK)	15(1) of the Tonnage Tax Act	Taxable income calculated on the basis of the net ton- nage of the ships, see the scale in section 15(1) of the Tonnage Tax Act. The field should not contain finance in- come/expenses. The amount must be stated in DKK. Currency translations must be based on published aver- age exchange rates.
		If the company has leased too much gross tonnage in re- lation to its own tonnage, see section 7 of the Tonnage Tax Act, the calculated scale income must be reduced by the percentage relating to the excess gross tonnage of the leased ships.	
317	Amount	Distribution of the year's profit/loss from jointly taxed com- panies (must be stated in DKK)	The field is filled in by companies that are part of a group of jointly taxed companies. Subsidiaries liable to pay ton- nage tax must contact the management company to obtain information about the amount. The field must con- tain the distribution of the year's profit/loss in relation to the company's total taxable income for the year, mean- ing both income calculated according to the Tonnage Tax Act and income calculated according to the general rules of tax legislation. If the company sets off tax losses from jointly taxed companies, the amount is stated as a plus (positive value). If jointly taxed companies carry for- ward the company's total tax loss to offset against their positive income, the amount is stated as a minus (nega- tive value). Separately taxed companies, meaning individual compa- nies, must declare DKK 0 in this field. The amount must be stated in DKK. Currency translations must be based on published average exchange rates.

This is relevant only to entities covered by section 1(1)(1) of the Corporation Tax Act.

318	Amount	Losses carried forward from pre- vious income years/sub-periods, meaning own losses and/or losses from jointly taxed compa- nies (stated in DKK)	The field must be filled in regardless of whether the com- pany is separately taxed or is part of a group of jointly taxed companies. Companies that are part of a group of jointly taxed companies must contact the management company to obtain information about the amount. The field must contain loss carryforward in relation to the company's total taxable income for the year, meaning both income calculated according to the Tonnage Tax Act and income calculated according to the general rules of tax legislation. The amount must be stated with a plus sign. The amount must be stated in DKK. Currency translations must be based on published average exchange rates.
321	Amount	Net turnover (stated in DKK)	Net turnover must always be declared, even if the com- pany is exempt from disclosing net turnover in its annual report. Net turnover from tax transparent entities, corresponding to the company's ownership share of the transparent en- tities, must be included in the amount stated. If the declaration is for a sub-period, only net turnover for the period covered by the sub-period must be declared. This also applies in relation to shares in tax transparent entities, for example K/S, P/S etc. The amount must be stated in DKK. Currency translations must be based on published aver- age exchange rates.
319	Amount	Net profit or loss before tax (de- clared in DKK)	Net income before tax according to the annual report. This must include the net profit or loss before tax from tax transparent entities, corresponding to the company's ownership share of the transparent entities. If the decla- ration is for a sub-period, only net profit or loss for the period covered by the sub-period must be declared. This also applies in relation to shares in tax transparent enti- ties, for example K/S, P/S etc. The amount must be declared in DKK. Currency translations must be based on published average exchange rates.
320	Amount	Net profit or loss in associates and affiliates as recognised in the in- come statement (must be declared in DKK)	The net profit or loss of associates and affiliates accord- ing to the annual report. If the declaration is for a sub- period, only the net profit or loss for associates and affili- ates in the period covered by the sub-period must be declared. The amount must be stated in DKK. Currency translations must be based on published average ex- change rates.

## 1.9.2 Matters requiring an audit opinion

Field number	Туре	Description	Guidance text
350	Yes:x/No:x	Is the company part of a group in which different choices have been made regarding the application of the tonnage tax scheme, see sec- tion 3 of the Tonnage Tax Act?	Shipping companies and operators within the same group do not have to make the same choices when they do not have a common management or operating or- ganisation and they do not operate in related business areas. However, this requires a written audit opinion, see sections 22(1) and 22(4) of the Tonnage Tax Act.

351	Yes:x/No:x	Has the company leased out ships on timecharter terms and allo- cated the income from this activity under the tonnage tax scheme, see section 6(2), first sentence, of the Tonnage Tax Act?	The matter requires an audit opinion to the effect that the conditions in section 6(2), first sentence, of the Ton- nage Tax Act are met. (The lessee uses the ship for purposes that could be covered by the Tonnage Tax Act if the ship was used for the same purpose by the lessor). See also section 22(2) of the Tonnage Tax Act.
352	Yes:x/No:x	Has the company leased out ships on bareboat terms and allocated the income from this activity un- der the tonnage tax scheme, see section 6(2), second sentence, of the Tonnage Tax Act?	The matter requires an audit opinion to the effect that the conditions in section 6(2), second sentence, of the Tonnage Tax Act are met. (Ships leased out on bareboat terms can only be covered by the tonnage scheme when the shipping company leases out ships for a maximum period of three years due to temporary excess capacity). See also section 22(1), first sentence, of the Tonnage Tax Act.
392	Yes:x/No:x	Does the gross tonnage from leasing out ships on bareboat terms constitute more than 50% of the total gross tonnage from shipping activities, see section 6(3) of the Tonnage Tax Act? The calculation does not include leasing out or subleasing without crew that takes place between consolidated companies resident in an EU or EEA member state.	It appears from section 6(3) of the Tonnage Tax Act that if the gross tonnage leased out or sub-leased (bareboat charter) by the shipping company on average over an in- come year is greater than 50% of the total gross tonnage of the shipping company, income from the ex- cess is taxed according to the general rules of tax legislation. For shipping companies that must make the same choices with regard to the application of the ton- nage tax scheme, see section 3(1) of the Tonnage Tax Act, the provisions of section 6(3) apply to the consoli- dated shipping companies as a whole.
393	Yes:x/No:x	Has the shipping company, on average over the period for which information is declared, maintained or increased the flag share for the EU/EEA-registered gross tonnage in relation to the flag share registered on the baseline day, see section 6a of the Tonnage Tax Act? For shipping companies that must make the same choices with regard to the application of the tonnage tax scheme, see section 3(1) of the Tonnage Tax Act apply to the consolidated shipping companies as a whole on a consolidated basis.	Reference is made to section 6a of the Tonnage Tax Act.
393a	Yes:x/No:x	Is the flag share for the owned EU/EEA registered gross tonnage on average over the income year below the 60% requirement?	Reference is made to section 6a(3) of the Tonnage Tax Act.
394	Yes:x/No:x	Has the operator, on average over the period for which the in- formation is declared, maintained or increased the flag share for the EU/EEA-registered gross tonnage in relation to the flag share regis- tered on the baseline day, see section 21a(2) of the Tonnage Tax Act? For operators that must make the same choices with regard to the application of the tonnage tax scheme, see section 3(1) of the	Reference is made to section 21a(2) of the Tonnage Tax Act.

		Tonnage Tax Act, the provisions of section 21a(2) of the Tonnage Tax Act apply to the consolidated operators as a whole on a consol- idated basis.	
394a	Yes:x/No:x	Is the flag share for the operated EU/EEA registered gross tonnage on average over the income year below the 60% requirement?	Reference is made to section 21a(2) of the Tonnage Tax Act.
395	Yes:x/No:x	Does the gross tonnage that has been available to the shipping company on average over the in- come year from leased ships amount to more than four times the gross tonnage owned by the shipping company itself, see sec- tion 7(1) of the Tonnage Tax Act? For consolidated shipping compa- nies that must make the same choices with regard to the ton- nage taxation scheme, see section 3(1) of the Tonnage Tax Act, the ratio between own and leased tonnage must be calcu- lated for the shipping companies as a whole.	Reference is made to section 7 of the Tonnage Tax Act.
396	Yes:x/No:x	Does the turnover from associ- ated activities account for 50% or more of the total turnover from shipping activities, see section 10(3) of the Tonnage Tax Act?	Associated activities are defined in section 10(2) of the Tonnage Tax Act. The Tax Agency points out that turno- ver must be calculated for each shipping company liable to pay tonnage tax and not on a consolidated basis. Any turnover from operator activities is not included in the statement.
397	Yes:x/No:x	Does the company agree that all the conditions for the tonnage tax scheme are met?	This condition applies to all companies under the ton- nage tax scheme and was imposed in Commission decision of 12 October 2018 C(2018) in State aid case SA.45300 (2016/N). As regards shipping activities, see section 22(1), fourth sentence, of the Tonnage Tax Act, and as regards operator activities, see section 22(4), fourth sentence of the Tonnage Tax Act.
398	Yes:x/No:x	Does the company have a nega- tive transitional balance on ships and/or equipment, see section 16(3) and (4) of the Tonnage Tax Act?	Reference is made to section 16 of the Tonnage Tax Act and section C.D.8.8.6.6 of our legal guide.

## 1.9.3 Flag information

Fiel	ld number	Туре	Description	Guidance text
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399	Yes:x/No:x	During the period for which the in- formation is declared, has the company exclusively carried out shipping activities with leased ships, see section 6 of the Ton- nage Tax Act?	Answer No if the company owns the ship(s) and/or the ship(s) are owned indirectly via tax transparent entities. Answer Yes if the company has only carried out shipping activities with leased ships. Please note that no flag information is required to be reported for leased ship(s).
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# 1.9.4 Flag information for shipping companies

Field number	Туре	Description	Guidance text
400R	Repeti- tions	Add ship	
400Ra	Text	Name of the ship	State the name of the ship and not the name of the K/S or similar that owns the ship in question.
400Rb	Amount	The ship's IMO no.	The IMO no. is a unique ship identifier, as a ship's name may change during its lifetime.
400Rc	Amount	Ownership share (%)	The company's ownership share of the ship in question. If a company participates as a limited partner and the company is covered by the tonnage tax scheme, the company's ownership share of the limited partner- ship/ship must be stated in this field. The same ship may have to be mentioned several times, for example if the company's ownership share in the limited partner- ship/ship changes during an income year/sub-period.
400Rd	Amount	Number of days	The number of days on which the ship has been used for purposes covered by the Tonnage Tax Act must be de- clared. The number of days is measured as whole days on which the ship has been owned by the company dur- ing the income year/sub-period, and regardless of whether the ship has been in operation or not.
400Re	Amount	Registered gross tonnage for the entire ship within the EU/EEA	The total gross tonnage of the ship registered in an EU/EEA member state. The same ship may have to be mentioned several times, for example if the ship's registration changes from an EU/EEA member state to a non-EU/EEA member state or vice versa during an income year/sub-period.
400Rf	Calcula- tion field	Average calculation within the EU/EEA	
400Rg	Amount	Registered gross tonnage for the entire ship outside the EU/EEA	The total gross tonnage of the ship registered in a non- EU/EEA member state. The same ship may have to be mentioned several times, for example if the ship's regis- tration changes from a non-EU/EEA member state to an EU/EEA member state or vice versa during an income year/sub-period.
400Rh	Calcula- tion field	Average calculation outside the EU/EEA	Average calculation outside the EU/EEA
400Ri	Calcula- tion field	Serial number	Serial number

400RfSum	Calcula- tion field	Sum total of the average owned gross tonnage registered within the EU/EEA	Sum total of the average owned gross tonnage regis- tered within the EU/EEA
400RfPct	Calcula- tion field	Percentage share of the average owned gross tonnage registered within the EU/EEA	For tonnage-taxed companies that are not part of a group with other tonnage-taxed companies, the percent- age share of the year's average owned gross tonnage registered within the EU/EEA is to be measured in rela- tion to the percentage share on the baseline day. The percentage share on the baseline day must be main- tained or increased.
400RhSum	Calcula- tion field	Sum total of the average owned gross tonnage registered outside the EU/EEA	Sum total of the average owned gross tonnage regis- tered outside the EU/EEA
400RhPct	Calcula- tion field	Percentage share for the average owned gross tonnage registered outside the EU/EEA	Percentage share for the average owned gross tonnage registered outside the EU/EEA

## **1.9.5** Flag information for operator activities

Field number	Туре	Description	Guidance text
4110	Repeti- tions	Add ship	
4110A	Text	Name of the ship	State the name of the ship and not the name of the K/S or similar that owns the ship in question.
4110b	Amount	The ship's IMO no.	The IMO no. is a unique ship identifier, as a ship's name may change during its lifetime.
4110c	Amount	Ownership share (%)	The company's operator share of the ship in question. If a company conducts operator activities through a tax transparent entity and the company is covered by the tonnage tax scheme, the company's ownership share of the tax transparent entity must be stated in this field. The same ship may have to be mentioned several times, for example if the company's ownership share in the tax transparent entity changes during an income year/sub- period.
4110d	Amount	Number of days	The number of days on which the ship has been used for purposes covered by the Tonnage Tax Act must be de- clared. The number of days is measured as whole days that the ship has been operated by the company during the in- come year/sub-period.
4110e	Amount	Registered gross tonnage for the entire ship within the EU/EEA	The total gross tonnage of the ship registered in an EU/EEA member state. The same ship may have to be mentioned several times, for example if the ship's registration changes from an EU/EEA member state to a non-EU/EEA member state or vice versa during an income year/sub-period.
4110f	Calcula- tion field	Average calculation within the EU/EEA	

4110g	Amount	Registered gross tonnage for the entire ship within the EU/EEA	The total gross tonnage of the ship registered in a non- EU/EEA member state. The same ship may have to be mentioned several times, for example if the ship's regis- tration changes from a non-EU/EEA member state to an EU/EEA member state or vice versa during an income year/sub-period.
4110h	Calcula- tion field	Average calculation outside the EU/EEA	Average calculation outside the EU/EEA
4110i	Calcula- tion field	Serial number	Serial number
4110fSum	Calcula- tion field	Sum total of the average operated gross tonnage registered within the EU/EEA	Sum total of the average operated gross tonnage regis- tered within the EU/EEA
4110fPct	Calcula- tion field	Percentage share for the average operated gross tonnage regis- tered within the EU/EEA	For tonnage-taxed companies that are not part of a group with other tonnage-taxed companies, the percent- age share for the year's average operated gross tonnage registered within the EU/EEA is to be measured in relation to the percentage on the baseline day. The percentage share on the baseline day must be main- tained or increased.
4110hSum	Calcula- tion field	Sum total for the average oper- ated gross tonnage registered outside the EU/EEA	Sum total for the average operated gross tonnage regis- tered outside the EU/EEA
4110hPct	Calcula- tion field	Percentage share for the average operated gross tonnage regis-tered outside the EU/EEA	Percentage share for the average operated gross ton- nage registered outside the EU/EEA

Field number	Туре	Description	Guidance text
89	Yes:x/No:x	Is the entity liable to pay tax cov- ered by the Danish Executive Order on Minimum Requirements for Large Enterprises ( <i>Mind-stekravsbekendtgørelsen for</i> <i>større virksomheder</i> ) (Executive Order no. 1295 of 14 November 2018)? NOTE: If yes, the company must attach the financial state- ments for tax purposes as an appendix to the tax return. See also Field info.	The Executive Order on Minimum Requirements for Large Enterprises (Executive Order no. 1295 of 14 No- vember 2018) applies in the following cases: (1) The entity liable to pay tax has a net turnover of more than DKK 100 million. The entity must attach the financial statements for tax purposes as an appendix to the tax return. (2) The entity liable to pay tax is part of a group of jointly taxed companies with a total net turnover at the joint taxation level of more than DKK 100 million. All the jointly taxed companies must attach the financial statements for tax purposes as appendices to the tax return. (3) The entity liable to pay tax is on the list of other legal entities listed in section 1(1) paras (1)-(8) and (10) of the Executive Order on Minimum Requirements for Large Enterprises, including electricity companies, cooperative societies, companies liable to pay tonnage tax, banks, companies subject to joint taxation according to section 31A of the Corporation Tax Act (international joint taxa- tion) and companies taxed on recapture of tax losses according to section 15 of Act no. 426 of 6 June 2005, among others. The entity must attach the financial state- ments for tax purposes as an appendix to the tax return. Further reference is made to section A.B.3.2.1.1 of our legal guide, which contains links to the executive orders on minimum requirements. If the answer is Yes, the financial statements for tax pur- poses must be attached as an appendix to the tax return. If the answer is No, continue reporting the tax return.
99	Yes:x/No:x	Is the net turnover below DKK 500,000?	For jointly taxed companies, the companies' total turno- ver is included in the assessment of whether the net turnover is less than DKK 500,000.

# 1.10 Accounting information and auditor assistance

Field 99 applies only to entities covered by section 1(1)(1) of the Corporation Tax Act.

#### **1.10.1** Information on auditor assistance

Field number	Туре	Description	Guidance text
102	Various options	Assistance: - No auditor assistance - Approved auditor - Other advisor	State whether an auditor has been involved in preparing the annual report or calculating the taxable income. If a state-authorised or registered public accountant has been involved, select 'Godkendt revisor' (Approved audi- tor). If an agricultural consultant, lawyer or other professional advisor is assisting with the tax return, se- lect 'Anden rådgiver' (Other advisor). If assistance is received from friends/family, select 'Ingen bistand' (No auditor assistance).

103	Yes:x/No:x	Is the annual report provided with an auditor opinion?	An auditor opinion is issued according to the Danish Ex- ecutive Order on State-Authorised and Registered Public Accountants' Opinions etc. ( <i>Bekendtgørelse om statsau- toriserede og registrerede revisorers erklæringer mv.</i> ) (Executive Order on Auditor Opinions) or according to auditing standards. The answer must be No if another auditor has been in- volved, or if no auditor has been involved.
104	Various options	Statement on: - audit - extended review - review - assistance with format - other	State the type of auditor assistance provided and about which the auditor has expressed their opinion. The types of opinions are set out in the Danish Executive Order on Approved Auditors' Opinions ( <i>Bekendtgørelse</i> <i>om godkendte revisors erklæringer</i> ). Tick 'andet' (other) for other assurance engagements according to the Executive Order on Auditor Opinions. These may include assurance engagements in connec- tion with liquidation or restructuring (mergers, divisions etc.), on environmental, ethical and social disclosures, on internal controls and IT systems, and on corporate governance.
105	Yes:x/No:x	Modifications/highlight of matters in the auditor opinion.	Concerns only the content of the opinion provided by the auditor as part of the annual report. State whether the auditor has issued modifications or highlight of matters. If so, this will be stated in a separate section of the opin- ion entitled 'Modifikationer' (Modifications) or under the heading 'Fremhævelse af forhold i regnskabet' (High- light of matters in the financial statements). Answer No if there are no such separate sections in the annual report.
106	Various options	Modifications/highlight of matters relating to: - compliance with tax legislation - compliance with company legis- lation - compliance with accounting leg- islation - other	1: Under compliance with tax legislation the auditor may, for example, have pointed out: * Non-declaration of: - VAT - Salary - A-tax - Company car - Other free benefits * Specific tax errors * Violation of or non-compliance with tax legislation * Illegal loans to owners and members of the executive and supervisory boards taken out after 14 August 2012 2: Under compliance with company legislation the audi- tor may, for example, have pointed out: * Loans to owners and members of the executive and supervisory boards (illegal loans to owners and mem- bers of the executive and supervisory boards) * Loss of share capital * Uncertainty about the continued operation of the com- pany or foundation 3: Under compliance with accounting legislation the au- ditor may, for example, have pointed out: * Non-compliance with bookkeeping or accounting reg- ulations, including failure to store accounting reg- ulations, including tailure to store accounting reg- ulations' assets and liabilities * Matters of importance to the financial statements have not been sufficiently disclosed to the auditor 4: Under 'other' the auditor may have pointed out: * Large losses on individual debtors
107	Yes:x/No:x	Has the taxable income been cal- culated with auditor assistance?	State whether the taxable income for the year has been calculated with assistance from a state-authorised or registered public accountant or an external advisor with

			accounting competence who is not a state-authorised or registered public accountant.
107a	Amount	The audit firm's CVR number	Here you can state the audit firm's CVR number
107b	Amount	The audit firm's P number	Here you can state the audit firm's P number

### 1.10.2 Selected information from the annual report

Field number	Туре	Description	Guidance text
111	Amount	Net turnover	Net turnover must always be declared, even if the entity liable to pay tax is exempt from disclosing net turnover in its annual report. Enter a numerical value without a plus or minus sign. Net turnover is the selling price of products and services etc. falling within ordinary activities less price reductions, VAT and other taxes directly linked to the selling price.
112	Amount	Cost of sales	Declare cost of sales in the form of purchases of raw ma- terials, consumables, goods for resale and packaging, adjusted for changes in inventories. Enter a numerical value without a plus or minus sign. Direct expenses in connection with the purchase, for ex- ample customs duties, freight etc. as well as price reductions, reimbursements etc., are included in the cal- culation. Outwork, that is processing of raw materials and semi-finished products by others (contract work), is also included in the statement.
113	Amount	Accounting depreciation	Accounting depreciation and amortisation includes cur- rent depreciation and amortisation reflecting the company's consumption pattern for fixed assets. Accounting depreciation and amortisation covers depre- ciation, amortisation and impairment for the year of property, plant and equipment and intangible assets, in- cluding: - buildings - installations - machinery and equipment - transport and other operating equipment - acquired goodwill and know-how and capitalised expenses for rationalisation and devel- opment. Enter a numerical value without a plus or minus sign.
115	Amount	Profit or loss from ordinary activi- ties before financing and extraordinary items	Declare the profit or loss from ordinary activities before financing and extraordinary items and taxes. If the result is negative, the amount must be entered with a - (minus sign).

116	Amount	Net profit or loss for the year be- fore tax	Declare net profit or loss for the year before tax If the re- sult is negative, the amount must be entered with a - (minus sign).
117	Amount	Taxes	Declare tax on profit for the year, including adjustment of deferred tax. Expenses in the annual report must be en- tered with a - (minus sign). Income in the annual report must be entered without a sign.
120	Amount	Inventories	Enter a numerical value without a plus or minus sign. The value of inventories in terms of: * Raw materials and consumables * Work in progress * Manufactured goods (possibly including IPO) and goods for resale * Prepayments for goods
121	Amount	Fixed assets	Enter a numerical value without a plus or minus sign. Fixed assets intended for permanent ownership or use by the company: * Intangible assets * Property, plant and equipment * Fixed asset investments
123	Amount	Equity	If equity is negative, the amount must be entered with a - (minus sign). Declare the taxpayer's equity in the form of: * contributed capital: for example share capital/base capital/tied-up capital * reserves * retained profits or losses * share premium on issue
124	Amount	Balance sheet	Enter a numerical value without a plus or minus sign. Declare the sum of all assets. The amount must corre- spond to the sum of equity, provisions and liabilities other than provisions.
126	Amount	Inflows of property, plant and equipment and intangible assets for the year at cost price	Declare the addition of assets intended for the com- pany's permanent ownership or use. Enter a numerical value without a plus or minus sign. If new financial leases are included in the accounts, the acquisition price of the leased item must be included.
127	Amount	Disposal of property, plant and equipment and intangible assets for the year at selling price	Enter a numerical value without a plus or minus sign. Disclose the selling price of divested assets – the value of divested buildings and land must be converted to cash value. Alternatively, you can use the book value, meaning the acquisition price of the divested assets minus accumu- lated depreciation and amortisation.

### **1.10.3** Information on the calculation of taxable income

Field number	Туре	Description	Guidance text
--------------	------	-------------	---------------

1	1		
130	Amount	Carryback of certain types of non- taxable income (see the guide)	Enter a numerical value without a plus or minus sign. Enter the total amount of carryback of income/gains from the annual report when declaring the year's taxa- ble income. Carryback of Danish or foreign dividends and net profit or loss from participating interests is not to be included in this field.
131	Amount	Carryback of certain non-deducti- ble expenses (see the guide)	Enter a numerical value without a plus or minus sign. Enter the total amount of carryback of a number of ex- penses from the annual report when declaring the year's taxable income. These are: * non-deductible share of entertainment expenses * loan costs – one-off commission from loans, guaran- tees etc. * fines, interest and fees Carryback of other expenses from the annual report is not to be included in this field.
134	Amount	Tax loss on the sale of intangible assets (goodwill etc.)	Enter a numerical value without a plus or minus sign. State the tax loss on the sale or abandonment of good- will, know-how, patent rights etc. Note that tax losses on the sale of shares or real prop- erty are to be declared separately as carryforward of losses attributed to specific sources of income (fields 086, 087 and 088).
136	Amount	Tax gain on shares (realisation or market-value principle)	Enter a numerical value without a plus or minus sign. State the total taxable gain on shares regardless of whether the realisation or the market-value principle is applied. The total amount must be stated before offset- ting against any losses.
137	Amount	Tax gain on the sale of real prop- erty	Enter a numerical value without a plus or minus sign. State the total taxable gain on the sale of real property. Sales of assets relating to business activities must only be included in the net turnover in field 111.
138	Amount	Tax gain on sale of intangible as- sets (goodwill etc.)	Enter a numerical value without a plus or minus sign. Declare the total taxable gain on the sale of intangible assets.
140	Amount	Real property, write-off on acqui- sition/demolition deduction	Enter a numerical value without a plus or minus sign. Declare write-off on expenses for conversion or im- provement of real property/installations, deductions for demolition and replacement of real property/installa- tions.
141	Amount	Real property, depreciation for tax purposes	Enter a numerical value without a plus or minus sign. Declare depreciation for tax purposes on buildings, in- stallations, refurbishment of rented premises etc. Note that you do not need to declare write-off or deductions for demolition in this field. They must be stated in field 140.
142	Amount	Real property, recovered depreci- ation	Enter a numerical value without a plus or minus sign. Disclose recovered depreciation on the sale of real property.
143	Amount	Operating equipment, ships and equipment, depreciation for tax purposes	Enter a numerical value without a plus or minus sign. The information includes, among other things, diminish- ing-balance depreciation on operating equipment and ships and depreciation on software and operating equipment with a useful life of less than three years. Please note that you do not need to declare write-off on small assets in this field – this must be stated in field 144.

144	Amount	Write-off on small assets	Enter a numerical value without a plus or minus sign. State the write-off on small assets. No other write-off needs to be reported in this field, for example on ex- penses for software and operating equipment with a useful life of less than three years. This must be stated in field 143.
145	Amount	Intangible assets (goodwill etc.), amortisation for tax purposes	Enter a numerical value without a plus or minus sign. Declare amortisation for tax purposes on goodwill and other intangible assets.
148	Amount	Losses on debtors	Enter a numerical value. Losses are declared without a plus or minus sign. Declare losses on debtors (goods receivables etc.) that have been deducted for tax purposes, for example pro- visions for losses on debtors. Any gains must be stated with a plus sign
149	Amount	Write-down for obsolescence on inventories	Enter a numerical value without a plus or minus sign. Disclose write-down for obsolescence on inventories, meaning non-marketable assets that have been de- ducted for tax purposes.
150	Amount	Deducted provisions	Enter a numerical value without a plus or minus sign. Declare provisions of any kind that have been deducted for tax purposes. These are, for example, provisions for service and war- ranty provisions and provisions for future expenses etc. No information is required on provisions for charita- ble/non-profit purposes, for consolidation etc. or for losses on debtors. They must be entered in field 148.
156	Amount	Gain or loss on redemption of cash loans	Declare gains or losses on extraordinary redemption of cash loans Do not state tax gains with a plus sign. Tax losses must be entered with a - (minus).
128	Yes:x/No:x	Have there been any changes to the accounting policies or valua- tion principles applied in the preparation of the annual report or taxable income?	Changes to accounting policies may include changes to accounting principles, recognition methods and meas- urement basis - the changes must be disclosed in the introduction to accounting policies in the section of the annual report: Accounting policies. With regard to the financial statements for tax purposes, this could be a change of the principles for calculating taxable income.
157	Yes:x/No:x	Has the taxpayer sold a property covered by the Danish Act on Tax- ation of Profit from Sale of Real Property ( <i>Ejendomsavance- beskatningsloven</i> ), see section 6D of that Act?	Answer Yes if the company has sold a property and cho- sen for some of the profit to be taxed according to the rules in section 6D of the Act on Taxation of Profit from Sale of Real Property. Notification of the choice is sub- ject to the company notifying the Tax Agency. The notification must be given no later than at the same time as the deadline for submission of the tax return for the income year in which the property was sold. The company must submit a copy of the purchase- money mortgage and information about the taxable profit, see section 6. The submitted information must in- clude a statement of the profit chosen to be included in the following income years (maximum 10% of the cash converted sales price for the property), the annual amount and the number of years over which the profit is included (maximum 10 years, after the sale). See further conditions to be complied with in section 6D(2) of the Property Taxation Act.

157a	Yes:x/No:x	Have any events occurred during the year causing the remaining deferred profit to be included in the calculation of taxable income, see section 6D(3) of the Act on Taxation of Profit from Sale of Real Property?	<ul> <li>Answer Yes if an event has occurred causing the remaining deferred profit to have to be included in the calculation of taxable income.</li> <li>The deferred profit must be included in the calculation of taxable income in the event of:</li> <li>full or partial sale of the property or a change of use so that it is no longer used in whole or in part for business purposes</li> <li>full or partial sale or redemption of the purchasemoney mortgage</li> <li>death of the seller, with the exception of section 6D(4).</li> <li>termination of the seller's tax liability, see section 10 of the Withholding Tax Act or section 5(7) of the Corporation Tax Act.</li> </ul>
157b	Amount	Moratorium balance covered by section 6D of the Act on Taxation of Profit from Sale of Real Property.	State here the moratorium balance covered by section 6D of the Act on Taxation of Profit from Sale of Real Property, see section 6D(14) of that Act.

### 1.10.4 Other information

Field number	Туре	Description	Guidance text
199	Yes:x/No:x	Does the company have investors making use of deductions, see the Tax Deduction for Investors Act?	Answer Yes if the company meets the conditions for be- ing a target company and has investors applying the rules for deduction of investments in the Tax Deduction for Investors Act. The conditions for being a target com- pany are set out in section 3 of the Tax Deduction for Investors Act.
199a	Yes:x/No:x	Has the company performed the statutory reporting according to section 29a of the Danish Tax Re- porting Act ( <i>Skatteindberetningsloven</i> )?	Answer Yes if the company has performed the statutory reporting as regards the investors applying the rules in the Tax Deduction for Investors Act. It is a condition for deduction that the target company has performed reporting according to section 29a of the Tax Reporting Act. For more information about reporting, see: https://skat.dk/skat.aspx?oid=16128
199b	Yes:x/No:x	Has the company received capital injections including shares sub- scribed for by investor deduction funds?	Answer Yes if the company has received capital injec- tions including shares subscribed for by investor deduction funds.
199c	Yes:x/No:x	Does the company's turnover consist mostly of passive capital investment, see section 34(6) of the Capital Gains Tax Act?	Answer Yes if the company's turnover predominantly consists of passive capital investment as described in section 34(6) of the Capital Gains Tax Act.

## 1.11 Transfer of shares

Field number	Туре	Description	Guidance text				
1001	Yes:x/No:x	Transfer of shares, see section 35B of the Capital Gains Tax Act	Have shares been contributed in connection with the es- tablishment of a fund according to section 35B(2) of the Capital Gains Tax Act (shares transferred after the es- tablishment of the fund are not included in the founder's tax)?				
1002	Yes:x/No:x	Historical application of the terms and conditions in section 35B of the Capital Gains Tax Act	Have transfers occurred in previous years, and is the founder's tax greater than DKK 0?				
1003	Amount	Reporting the balance of founder's tax	Reporting the balance of founder's tax (both in the event of transfer and the current annual balance – section 35D of the Capital Gains Tax Act)				
1004	Amount	Any balance wholly or partially due regarding founder's tax must be stated here. Remember to at- tach the statement of holdings for the fund	Any balance wholly or partially due regarding founder's tax must be stated here. Remember to attach the state- ment of holdings for the fund				
1005	Yes:x/No:x	Are dividends from shares in- cluded in the statement of holdings, see section 35D(4) of the Capital Gains Tax?	Have dividends been received on shares as shown in the statement of holdings, see section 35D(4) of the Capital Gains Tax Act?				
1005a	Amount	Amount of dividends from shares in the statement of holdings, see section 35D(4) of the Capital Gains Tax Act	Enter the amount of dividends received on shares as shown in the statement of holdings, see section 35D(4) of the Capital Gains Tax Act.				
1006	Yes:x/No:x	Transfer of shares included in the statement of holdings, see section 35D(2) of the Capital Gains Tax Act	Has the fund sold or otherwise disposed of some or all of the shares listed in the statement of holdings at the end of last year?				
1006α	Amount	Statement of gains or losses from sale of shares included in the statement of holdings, see section 35D(2) of the Capital Gains Tax Act	Enter here the amount that the fund has lost or gained on the sale of the shares in field 1006, see section 35D(2) of the Capital Gains Tax Act.				
1007	Amount	Interest on the founder's tax bal- ance, see section 35D(6) of the Capital Gains Tax Act.	Interest is calculated at 1% above Danmarks National- bank's discount rate, but at a minimum of 1% per year, see section 35D(6) of the Capital Gains Tax Act for fur- ther information on due dates and payment deadlines.				

1008	Amount	Write-down of the balance of founder's tax, see section 35D(5) of the Capital Gains Tax Act.	Has the fund made distributions or provisions for chari- table or non-profit purposes that are not deductible from the fund's taxable income?
1009	Text	Country	-
1010	Text	Address	-
1011	Yes:x/No:x	Conditions for period of owner- ship, see section 35E of the Capital Gains Tax Act	If the condition in section 35B(1)(2) is met for at least 5 years from the date of transfer.
1011a	Date	Latest transfer date	The transfer date must not be later than the end date of the period you are currently reporting for.
1012	Yes:x/No:x	Moving domicile, see section 35F(2) and (3) of the Capital Gains Tax Act.	Has the fund moved its domicile?
1013	Yes:x/No:x	Marking of EU/EEA relation, see section 35F(2) and (3) of the Cap- ital Gains Tax Act.	Is the fund domiciled: o in the EU/EEA o outside the EU/EEA

# 2. Taxable income – tab 2

Under tab 2 'Skattepligtig indkomst' (Taxable income), the management company or the individual company must fill in fields 076 and 003. Field 080 is calculated from the sum of field 076, where field 016 is calculated from fields 080 and 003. The management company must report the taxable income for the entire group of jointly taxed companies. The taxable income must be declared before any set-off against losses from previous income years.

Individual companies without special circumstances can use automatic calculation. The box 'automatisk beregning' (automatic calculation) is ticked from the start. This implies automatic calculation of field 003 'Anvendt skattemæssigt underskud fra tidligere indkomstår' (Tax loss carryforward from previous income years) and field 016 'Skattepligtig indkomst efter anvendt underskud' (Taxable income after loss carryforward). To deselect automatic calculation, remove the check mark and enter the amount manually in field 003 'Anvendt skattemæssigt underskud fra tidligere indkomstår' (Tax loss carryforward from previous income years).

Field number	Туре	Description	Guidance text
076	Amount	Declared taxable income before deduction and allocation of losses	The field must be reported. The reported amount must be the taxable income before deduction and allocation of losses, that is both before deduction of losses from previous income years and be- fore allocation of losses for the current income year. For groups of jointly taxed companies, the management company fills in the field for each of the jointly taxed companies etc. Amounts entered in field 76 are summa- rised by the Tax Agency in field 080 and shown for the management company. The summarised amount consti- tutes the jointly taxable income before deduction and allocation of losses. If the company has applied for payout of a tax credit ac- cording to the rules of section 8X of the Tax Assessment Act, negative taxable income must not be reduced by the amount on which the payout is based. This will instead take place in field 004.
080	Calcu- lated amount	Taxable income before losses	Summation of all reported amounts in field 076 for all jointly taxable companies etc. This is the jointly taxable income before deduction of losses for the current and previous income years Shown for the management company.
003	Amount	Carryforward of tax losses from previous income years	Contains the tax losses for the year carried forward from previous income years. The amount should be entered without plus or minus signs. For separately taxed companies etc. for which no events have occurred during the year affecting the company's loss carryforward, the amount is automatically calcu- lated on the basis of the information in the loss register. If the company etc. disagrees with the automatic calcula- tion, the amount may be overwritten. For separately taxed companies etc. for which events have occurred during the year affecting the company's loss carryforward, the amount must be reported.

			For jointly taxed companies etc., the total carryforward of losses from previous years for the entire group of jointly taxed companies must be reported by the management company.
016	Calcu- lated amount	Total taxable income after loss carryforward	The amount is calculated by the Tax Agency on the basis of the available information from the company. The field contains taxable income after losses. Negative taxable income is indicated by - (minus sign). For the individual company, the set-off of losses from previous years may not exceed the year's positive taxa- ble income before loss carryforward. For jointly taxed companies, the jointly taxable income is calculated by the management company on the basis of the available information provided by the companies. As regards joint taxation, this is the total jointly taxable in- come after loss carryforward.

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	Feltbeskrivelse	Feltinfo	Felt nr.		
	Skattepligtig indkomst før fradrag af underskud fra tidligere indkomstår	_			
	36596368 Dias-as-36596368 01-01-2016 - 31-12-2016	0	076		
	Skattepligtig indkomst før underskud	Ō	080	-100.000	
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#### Chart 1. Tab 2 'Skattepligtig indkomst' (Taxable income) shown for an individual company (without automatic calculation)

Source: E-tax for companies (DIAS) | Test

#### Chart 2. Tab 2 'Skattepligtig indkomst' (Taxable income) shown for an individual company (with automatic calculation)

beret Skattepligtig indkomst Ultimo underskud Konsekvens Kvittering			
I nedenstående skema indberettes skattepligtig indkomst i felt 076. For sambeskatningskredse er det administrationsselskabet, der indberetter	for hver enkelt enhed i sambeskatningskredsen.		
I felt 003 anføres skattemæssige underskud fra tidligere indkomstår, som udnyttes i indkomstperioden.			
I for sambeskatningskredse er det administrationsselskabet, der indberetter det samlede belab for hele sambeskatningskredsen.			
Såfremt et enkeltstående selskab er omfattet af reglerne om underskudsbegrænsning jfr. SEL § 12 vil dette blive beregnet automatisk ved anv	endelse af 'Automatisk beregning'.		
attepligtig indkomst og underskudsfremførsel			
Itbeskrivelse	Feltinfo	Felt nr.	Anvend Automatisk Beregnin
attepligtig indkomst før fradrag af underskud fra tidligere indkomstår			
456009 Dias-as-46456009 01-01-2022 - 31-12-2022	0	076	
attepligtig indkomst før underskud	0	080	
vendt skattemæssigt underskud fra tidligere indkomstår.	Θ	003	Vis automatisk berege
attepligtig indkomst efter anvendt underskud	0	016	
			Gem k
age til indberet			Gå til ultimo und
Jå som SE+nr.			
sa kom sc=nr. 19 - Olas-as- 19			
skriv			
are skrift			

Source: E-tax for companies (DIAS) | Test

Chart 3. Tab 2 'Skattepligtig indkomst' (Taxable income) shown for a management company in a group of jointly taxed comapnies

beret Skattepligtig indkomst Ultimo underskud Konsekvens Kvittering			
I nedenstående skema indberettes skattepligtig indkomst i felt 076. For sambeskatningskredse er det I felt 003 anføres skattemæssige underskud fra tidligere indkomstår, som udnyttes i indkomstperiode For sambeskatningskredse er det administrationsselskabet, der indberetter det samlede beløb for hel Såfremt et enkeltstående selskab er omfattet af reglerne om underskudsbegrænsning ifr. SEL § 12 vi	n. e sambeskatningskredsen.		ingskredsen.
attepligtig indkomst og underskudsfremførsel			
altbeskrivelse	Feltinfo	Felt nr.	
kattepligtig indkomst før fradrag af underskud fra tidligere indkomstår			
3302795 Dias-as-43302795 01-01-2020 - 31-12-2020	0	076	15.000.00
3302809 Dias-as-43302809 01-01-2020 - 31-12-2020	0	076	20.000.00
3302817 Dias-as-43302817 01-01-2020 - 31-12-2020	0	076	58.000.00
3302825 Dias-as-43302825 01-01-2020 - 31-12-2020	0	076	-200.000.00
3302833 Dias-as-43302833 01-01-2020 - 31-12-2020	0	076	80.000.00
3302841 Dias-as-43302841 01-01-2020 - 31-12-2020	0	076	48.000.00
3302868 Dias-as-43302868 01-01-2020 - 31-12-2020	0	076	20.000.00
kattepligtig indkomst før underskud	0	080	41.000.00
nvendt skattemæssigt underskud fra tidligere indkomstår.	0	003	
	0	016	41.000.00
kattepligtig indkomst efter anvendt underskud			

Source: E-tax for companies (DIAS) | Test

Note: If, under tab 1, the company has stated more in field 019 'Lempelse for betalt skat i udlandet' (Relief from tax paid abroad) than the tax value of the taxable income, you cannot move on from tab 2 'Skattepligtig indkomst' (Taxable income) to tab 3 'Ultimo underskud' (End-of-period loss). You must therefore press 'tilbage til indberet' (back to report) and correct field 019.

# **3. End-of-period loss**

The management company must report loss carryforward from previous years. The reporting must be made for each company and per income year at company level.

Management companies must themselves declare the loss value at the beginning of the period for subsidiaries joining the group of jointly taxed companies in the income year in question.

It is important that loss carryforward from previous years is in line with field 003, that is 'Anvendte egne underskud fra tidligere år' (Own loss carryforward from previous years) and 'Fordeling af tidligere års underskud i sambeskatning' (Allocation of losses from previous years in joint taxation), see Chart 1.

In empty fields that can be changed, 0 or the correct amount must be declared.

There must be agreement between 'Primo restunderskud samt evt. underskud opstået i indkomståret' (Residual loss at the beginning of the period and any loss incurred in the income year) minus 'Anvendte egne underskud fra tidligere år (Own loss carryforward from previous years) and 'Fordeling af tidligere års underskud i sambeskatning' (Allocation of losses from previous years in joint taxation) and 'Ultimo restunderskud' (End-of-period residual loss). If the amount is not correct, you will get an error message and it will not be possible to complete the reporting.

#### Chart 4. Tab 3 End-of-period loss for group of jointly taxed companies



Source: E-tax for companies (DIAS) | Test

Note: Companies using the tax credit scheme will have an extra column where the amount applied for must be allocated among the companies that have a residual loss after allocation of the year's loss among the jointly taxed companies.

#### Chart 5. Tab 3 End-of-period loss for group of jointly taxed companies

Ejers cvr- /se-nr.	Ejers navn	Underskud opstået hos	Opstået i indkomstår / periode	Der selvangives for indkomstår / periode	Primo restunderskud samt evt. underskud opstået i indkomståret	Anvendte egne underskud fra tidligere år	Fordeling af årets underskud i sambeskatning	Anvendt i skattekreditord ningen (Ligningsloven \$ 8X)(Forholdsm æssig fordeling)	Fordeling af tidligere års underskud i sambeskatning	Skattepligtig indkomst	Ultimo restunderskud
A	Selskab A										
Felt 076 Skatt	epligtig indkoms	st før fordeling af underskud								-1.126.009	
А	A	Selskab A	2022 01-01-2022 - 31-12-2022	- 2022 01-01-2022 - 31-12-2022	1.126.009	0	25.770	413.834	0		686.405
в	selskab B										
		st før fordeling af underskud								1.556.802	
в	в	Selskab B	202120-05-2021 31-12-2021	2022 01-01-2022 - 31-12-2022	455.202	0	0	0	0		455.202
Fordeling af år	rets underskud						1.556.802				
с	Selskab C										
		st før fordeling af underskud								-66,558,840	
Teleoro Skale	epiigag makome	straf fordeling ar underskud	2022 01-01-2022 -	2022 01-01-2022						-00.330.040	
с	С	Selskab C	31-12-2022	- 31-12-2022	66.558.840	0	1.523.294	24.461.899	0		40.573.648
D	Selskab D										
		st før fordeling af underskud								-338.120	
				2022 01-01-2022							
D	D	Selskab D	31-12-2022	- 31-12-2022	338.120	0			0		206.115
Sum					68.478.171	0	1.556.802	25.000.000	0		41.921.370
		Afstemning			Sum, jf. oven	stående tabel	Oplyst i felt	Diffe	ence		
Skattepligtig in	lerskud fra tidlig ndkomst for indl drørende forsøg	ere år (felt 003) komståret (felt 016) Is- og forskningsaktiviteter (fel	t 009a)			0 -66.466.167 25.000.000	-41.466.167		0 -25.000.000 0		

Source: E-tax for companies (DIAS) | Test

Foreign branches with negative taxable income in joint taxation must call the Tax Agency, tel. +45 72 22 28 82.