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THE QUALIFIED COUNTRY-BY-COUNTRY REPORT

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How to adjust the country-by-country report to be qualifying for the transitional safe harbour rules

To benefit from the transitional safe harbour rules under the GloBE Model Rules, multinational groups must prepare a qualified country-by-country report. This article examines how an existing country-by-country report must be adjusted to meet the requirements for being "qualified" and what challenges the group may face.

1. INTRODUCTION

To provide administrative relief to affected multinational enterprise groups (hereafter "MNE groups") in the initial years, the GloBE Model Rules (hereafter also "MR") state in art. 8.2 that the GloBE Implementation Framework may adopt temporary (and permanent) safe harbour rules. This provision has been incorporated into the Transitional CbCR Safe Harbours set out in the document "Safe Harbours and Penalty Relief: Global Anti-Base Erosion Rules (Pillar Two)" published in December 2022 (hereafter the "Safe Harbour Paper"). The Implementation Framework has further specified these rules in the Administrative Guidance of December 2023 (together referred to as the "P2 regulations").

During a transitional period of three years (all financial years beginning on or before 31 December 2026 but not including financial years that end after 30 June 2028), an in-scope MNE group in a jurisdiction will not have to prepare a detailed calculation of the tax base and will not have to pay any top-up taxes if at least one of the following three Safe Harbour Tests per jurisdiction is satisfied:

- *De minimis Test:* total revenue of less than EUR 10 m and profit before income tax of less than EUR 1 m according to the MNE group's qualified country-by-country report.
- *Simplified ETR Test:* effective tax rate is equal or greater than 15 % (fiscal years beginning in 2023/2024), 16 % (2025) and 17 % (2026), respectively.
- *Routine Profit Test:* profit before income tax according to the MNE group's qualified country-by-country report is equal or less than the substance-based income exclusion amount.

These tests follow a "once out, always out" approach, i. e., if the MNE group does not satisfy any of the tests in a jurisdiction in one year, it will not be able to apply the Transitional CbCR Safe Harbours in subsequent transitional years. The Safe Harbour Tests apply to the Income Inclusion Rule (IIR) and the Undertaxed Profit Rule (UTPR), but the jurisdictions may also apply them to the Qualified Domestic Minimum Top-up Tax (QDMTT) as Switzerland does.

Various data points of these tests are derived from the Qualified Country-by-Country Report (hereafter "CbCR"), which will be a key report during the transitional period. Other data points will come directly from the financial statements of the Constituent Entities. This article, which is a summary of webinars held by Deloitte Switzerland together with SwissHoldings, the Swiss Insurance Association and the Swiss Banking Association, in spring 2024, examines in detail the requirements for the CbCR to be "qualified" for the purposes of the Transitional CbCR Safe Harbours.

2. BASIC PRINCIPLES

2.1 Legacy CbCR. The CbCR was originally introduced in 2015 as a minimum standard for member states as part of the BEPS project and serves as a tool for an initial risk assessment of an MNE group's transfer pricing. Switzerland also introduced it in 2017, based on the Federal Act on the International Automatic Exchange of Country-by-Country Reports of Multinational Groups (ALBAG, SR 654.1) [1]. In Switzerland, an MNE group is only required to submit a CbCR if it has an annual turnover of CHF 900 m, which was equiva-

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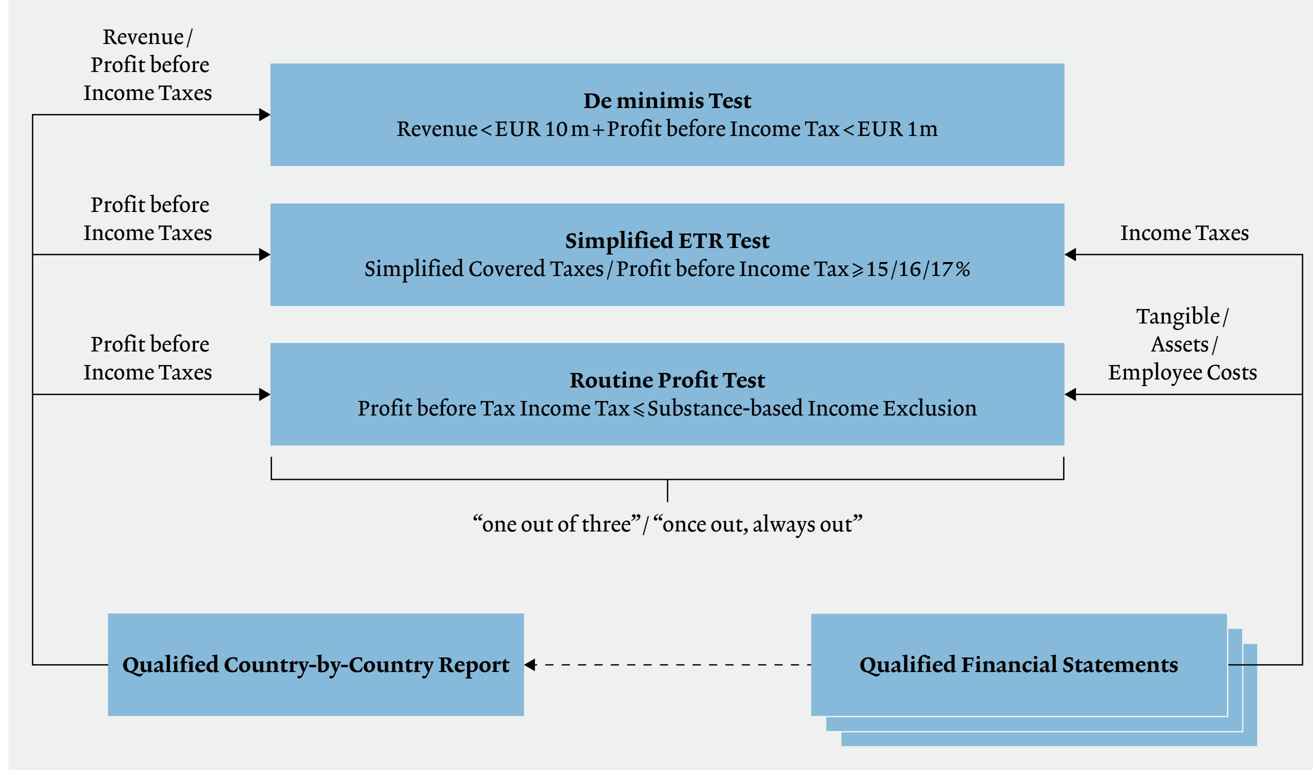
Exhibit 1: **OVERVIEW OF DATA SOURCING**



lent to EUR 750 m at the exchange rate of 1.20 back at the time the CbCR was introduced.

The OECD has issued several guidelines for the preparation of CbCRs. In particular, the Final Report on Action 13 of 2015 and the Guidance on the Implementation of Country-by-Country Reporting, which was last updated in May 2024 (together referred to as "legacy CbCR regulations"). The legacy CbCR regulations are rather flexible with respect to data sources: MNE groups may use data from consolidated financial statements (prepared in accordance with an international accounting standard), local financial statements (prepared in accordance with local GAAP), management reporting, or even a combination of data sources.

2.2 Qualified CbCR. For the purposes of the Transitional CbCR Safe Harbours, an MNE group's CbCR can only be used if it is "qualified". According to the P2 regulations and our understanding, several requirements must be fulfilled, which can be found both in the legacy CbCR regulations as well as in the Safe Harbour Paper published in December 2022 (together referred to as "qualified CbCR regulations"). The status of "qualified" must be met not on a global basis, but on a country basis. The same CbC report can be qualified for some countries and not qualified for other countries [2].

2.2.1 Legacy CbCR Regulations. Although not explicitly required by the P2 regulations, CbCR must first comply with all existing legacy CbCR regulations. Those requirements are an integral part of the qualified CbCR regulations. In practice, MNE groups have not always implemented these requirements strictly in recent years, sometimes taking a more pragmatic approach (80/20 approach [3]). This was partly due to a lack of knowledge of the detailed rules and partly due to a lack of data availability within the group. The CbCR was of little importance in practice, especially in Switzerland. These data point requirements are explained in detail in section 3.

2.2.2 Qualified Financial Statements. While reporting MNE groups are relatively flexible in selecting and combining their data sources when preparing the legacy CbCR, the qualified CbCR must be prepared based on Qualified Financial Statements. The term is defined as follows [4]:

- → accounts used to prepare the consolidated financial statements of the MNE group in accordance with an acceptable or authorised accounting standard; or
- → separate financial statements of each Constituent Entity, provided they are prepared in accordance with an acceptable or authorised accounting standard; or
- → in the case of a Constituent Entity that is not included in the MNE group's financial statements solely for reasons of size or materiality, the financial accounts of that entity that are used on the Legacy CbCR.

The acceptable accounting standards are listed exhaustively in art. 10.1.1 MR and include, e. g., IFRS, US GAAP and Swiss GAAP FER. An authorised accounting standard can only be applied if it does not materially deviate from IFRS (otherwise adjustments are required).

Due to the rules described above, the qualified CbCR does not have to be prepared in its entirety based on the same accounting standard. A combination is therefore possible (e. g.,

Exhibit 2: **LEGACY VS. QUALIFIED CBCR**

	Legacy CbCR	**Qualified CbCR**
Purpose	Instrument for initial risk assessment	Data source for Transitional CbCR Safe Harbour
Requirement	EUR 750 m consolidated annual revenue (Switzerland: CHF 900 m)	EUR 750 m consolidated annual revenue (Switzerland: EUR 750 m)
Origin	2015 (BEPS Action Point 13)	2023 (Pillar II)
Data Source	Various data sources (incl. combination), consistent over years	Qualified financial statements

IFRS in country A and Swiss GAAP FER in country B). However, the OECD made certain clarifications in its Administrative Guidance of December 2023. For example, if an MNE group has several companies in one country, all these companies must use the same data source. A combination within one country is not permitted [5].

3. DATA POINTS

The following explanations first provide an overview for each CbCR data point of what is required by the legacy CbCR regulations and then whether the qualified CbCR and P2 regulations may deviate from this.

3.1 Constituent Entity. The CbCR requires that the aggregated figures of all Constituent Entities in a jurisdiction are reported. The legacy CbCR regulations understand this term as being "any separate business unit of a MNE group included in the consolidated financial statements or that is not included solely on size or materiality grounds and all permanent establishments of Constituent Entities if it prepares a separate financial statement for financial reporting, regulatory, tax reporting or internal management control purposes [6]". It is not decisive whether the Constituent Entity is controlled by the MNE group at the end of the period (e.g. as of 31 December). It is sufficient both for the legacy and the qualified CbCR if the entity has been consolidated for a specified time during the reporting period (e.g. 1 January to 30 March) [7].

The qualified CbCR regulations do not include a separate definition of the term, but the definition in the P2 regulations is broadly aligned: "Any entity that is included in an MNE group and any permanent establishment of a main entity" [8]. However, there are certain nuances, especially with respect to permanent establishments. While (even unregistered) permanent establishments must be included in the legacy CbCR as a Constituent Entity if they must report separate figures for whatever reason, the MR have a narrower definition. In simplified terms, the MR only include permanent establishments from a tax perspective, i.e., based on double tax treaties, the OECD Model Tax Convention, or domestic law [9]. This discrepancy is a particular issue in regulated industries such as banking or pharmaceuticals: representative offices regularly do not qualify as permanent establishments for tax purposes, yet separate figures must be prepared for the regulator. According to the legacy CbCR, this would be sufficient to qualify as a Constituent Entity.

3.2 Tax Jurisdiction. In the first column of the CbCR, a Constituent Entity must be allocated to the tax jurisdiction in which it is a tax resident. The term "tax jurisdiction" is broadly defined in the legacy CbCR regulations as a "state or non-state jurisdiction which has fiscal autonomy" [10]. Where a Constituent Entity is resident in more than one tax jurisdiction, the applicable tax treaty tie breaker should be applied to determine the tax jurisdiction of residence. Where no applicable tax treaty exists, the Constituent Entity should be reported in the tax jurisdiction of the Constituent Entity's place of effective management [11]. All Constituent Entities which are not resident in any tax jurisdiction shall be reported in a separate line and indicated as being "stateless" [12].

There is no separate definition of the term in the qualified CbCR regulations and Constituent Entities must also be allocated to a tax jurisdiction based on its tax residency. However, the rules on tax residency according to the MR, which –

Exhibit 3: **ALLOCATION RULES TO TAX JURISDICTION**

General Rule (Art. 10.3.1 MR)	→ according to domestic law (based on principles such as: place of effective management); → if no domestic law: place of creation; → if double-residency: tie-breaker rule according to double tax treaty or where more covered taxes are paid
Special Rule Flow – Through Entities (Art. 10.3.2 MR)	→ if ultimate parent entity or is required to apply IIR: place of creation; → all other cases: stateless
Special Rule Permanent Establishments (Art. 10.3.3 MR)	→ location of business presence; → all other cases: stateless

based on our interpretation – are also applicable for the qualified CbCR, are more detailed (see *exhibit 3*).

As all stateless Constituent Entities are not allowed to apply the Transitional Safe Harbour Tests, the proper assignment to a tax jurisdiction or to the separate "stateless" line is of great importance. In the authors' experience, it was common for little attention to be paid to this topic in the legacy CbCR.

3.3 Revenues from Unrelated & Related Parties. The revenue figures, both from related and unrelated parties, are required for the De minimis Safe Harbour Test (less than EUR 10 m revenues per tax jurisdiction).

In the legacy CbCR, the reporting MNE needs to report the revenues from both related [13] and unrelated parties. The term "revenues" is defined as all "revenues from sales of inventory and properties, services, royalties, interest, premiums and any other amounts" [14]. It shall also include extraordinary income and gains from investment activities [15], but no payments received from other Constituent Entities that are treated as dividends in the payor's tax jurisdiction [16]. Comprehensive income/earnings ("OCI"), revaluations, and/or unrealised gains reflected in net assets and the equity section of the balance sheet should not be reported as revenues [17]. Importantly, data should be reported on an aggregated basis, regardless of whether the transactions occurred cross-border or within the same tax jurisdiction [18]; an exemption only applies in case a tax jurisdiction allows the taxation of several Constituent Entities on a consolidated level [19]. This exemption is in line with the election right in art. 3.2.8 MR. In practice, the authors have observed that MNE groups often only include subgroup figures in CbCR on a consolidated instead of an aggregated basis or incorrectly do not exclude dividend payments. This could lead either to an over- or understatement of revenues, which could impact the De minimis Safe Harbour Test.

The qualified CbCR regulations do not include a separate definition of the term "revenue", however, the Pillar 2 definition in the Administrative Guidance 12/2023 is broadly aligned with the legacy CbCR definition [20]. The P2 regulations are silent as to whether (un-)realised FX gains or losses can be considered.

3.4 Profit (Loss) Before Income Tax. The profit (loss) before income tax, which must be reported in the fifth column of the CbCR template, is the key data point of the qualified CbCR as it is required for all three Safe Harbour Tests (De minimis Test, Simplified ETR Test, Routine Profit Test).

There is no separate definition of profit (loss) before income tax in the legacy CbCR regulations, but they require the inclusion of both extraordinary income and expense items [21] as well as the exclusion of payments received from other Constituent Entities that are treated as dividends in the payor's tax jurisdiction. Although the qualified CbCR regulations do not have a separate definition of this data point, any net unrealised fair value loss of at least EUR 50 m (per tax jurisdiction) included in the qualified CbCR must be excluded when applying the three Safe Harbours Tests. The term is understood as the sum of all losses, reduced by any gains, that arise through changes in the fair value of qualified participations of 10 % or higher (non-portfolio shareholdings) [22]. No adjustment shall be made if a tested tax jurisdiction reports a net unrealised fair value loss not exceeding EUR 50 m or a net fair value gain (i. e. when fair value gains and reversals of impairments are higher than fair value losses and impairments).

3.5 Income Taxes. The income taxes data point (both paid and accrued), which must be reported in the sixth and seventh column of the CbCR, are not relevant for the application of the Simplified ETR Test. The figure is sourced directly from either the stand-alone financial statements or the reporting package (adjusted for uncertain tax positions and non-covered taxes [23]). Nevertheless, this data point must be correctly reported in the CbCR, as otherwise the CbCR is not deemed "qualified" according to the view expressed here.

3.5.1 Paid. The first tax-related data point should include all income taxes paid by the Constituent Entity during the relevant reporting period, both to the tax residence jurisdiction and to all other tax jurisdictions (except for the jurisdictions of permanent establishments to the extent that the permanent establishment is a separate Constituent Entity) [24]. Not only should it include income taxes paid related to the current fiscal year, but also to previous years (unlike income taxes accrued, see 3.5.2 below) and pre-payments for future years [25], as well as refund of income taxes [26]. Moreover, this position should also include withholding taxes paid by other entities (both by other Constituent Entities and independent entities) with respect to payments to the Constituent Entity. While under the OECD Model Rules withholding taxes are allocated either to the paying or receiving company depending on the type of payment [27], in the CbCR withholding taxes must be allocated exclusively to the receiving company [28]. To the extent that dividends from other Constituent Entities are excluded from both the revenue (see 3.3) and profit (loss) before income taxes (see 3.4) data points, the related income taxes must also be excluded [29].

3.5.2 Accrued. The income taxes accrued data point shall be limited to taxes on the taxable profit of the relevant reporting period (unlike the income taxes paid data point, see above). Any deferred income taxes and provisions for uncertain income tax positions (e. g., under IFRIC 23 for IFRS or ASC 740-10 for US GAAP) shall not be disclosed in this position [30]. As with income taxes paid, any accrued taxes related to excluded dividends shall not be reported in this data point either [31].

3.6 Stated Capital. The stated capital data point, which must be disclosed in the eighth column, is also irrelevant for the Transitional Safe Harbour Rules, but needs to be correctly reported under the legacy CbCR regulations in order to have a qualified CbCR. The regulations do not include a definition of stated capital. Permanent establishments should not report a separate stated capital (to be reported in the head office's tax jurisdiction) unless there is a defined capital requirement for regulatory purposes (e. g., foreign bank branches). The re-

ported amount of stated capital must always be positive [32]. No separate guidance is provided by the qualified CbCR regulations.

3.7 Accumulated Earnings. The legacy CbCR regulations do not include a clear definition of the term, but it should cover both positive figures (accumulated profits) and negative figures (accumulated losses). If a negative amount is reported in one tax jurisdiction, the OECD requires a mandatory disclosure in table 3 [33]. Permanent establishments must not report any accumulated earnings; they should be reported in the head office's tax jurisdiction [34]. The qualified CbCR regulations do not have separate guidance on this data point.

3.8 Number of Employees. The next data point to be reported in the tenth column requires a disclosure of the number of employees on a full-time-equivalent basis. The reporting MNE can disclose those figures either as of the year-end, based on the average employment levels for the year, or on any other basis consistently applied from one year to the next. Independent contractors participating in the ordinary operating activities may be reported as employees [35]. Although the number of employees is not required for any Safe Harbour Tests, the Routine Profit Tests based on the substance-based income exclusion requires the payroll costs of employees (incl. contractors integrated into the organisation) to be reported in the CbCR.

3.9 Tangible Assets. In the eleventh column, the reporting MNE needs to disclose the sum of the net book values of tangible assets of all the Constituent Entities resident for tax purposes in the relevant tax jurisdiction. There is no positive definition of the term in the legacy CbCR regulations, but negatively spoken, tangible assets shall not include cash or cash equivalents, intangibles or financial assets. Regarding permanent establishments, assets should be reported with reference to the tax jurisdiction in which the permanent establishment is situated [36].

Although tangible assets are required for the Routine Profit Test, the qualified CbCR regulations do not provide any guidance. The data point is not extracted from the qualified CbCR, but directly from the financial statements of the Constituent Entities. There are differences to consider: whereas the legacy CbCR regulations require tangible assets to be disclosed according to their carrying value in the Qualified Financial Statements, the Routine Profit Test is calculated based on the average of the carrying value (net of accumulated depreciation, amortisation, or depletion and including any amount attributable to the capitalisation of payroll expenses) at the beginning and ending of the reporting fiscal year [37]. Moreover, Routine Profit Test purchases accounting adjustments (e.g., based on IFRS 3) can be taken into account for the test [38] but this is not allowed in the qualified CbCR. Whereas the legacy / qualified CbCR requires the reporting MNE to also disclose properties held for investment, sale, or lease, such assets are excluded from the Routine Profit Test [39].

4. SPECIAL TOPICS

4.1 Investment Funds. Whereas the legacy CbCR uses the term "investment funds", both the qualified CbCR and the P2 regulations use the terms "investment funds" and "investment entities" (although the latter has a slightly broader definition).

In the legacy CbCR, investment funds should only be reported in the CbCR if they are included in the consolidated financial statements of the reporting MNE group (i.e., treatment depends on accounting standard). The qualified CbCR regulations do not include any separate guidance. In practice, however, the group reporting packages of investment funds are often only prepared in accordance with local investment funds' accounting standards (e.g., KAG accounting standards in Switzerland), which are not Qualified Financial Statements (see 2.3.2 above). MNE groups must therefore check the data source used while preparing the CbCR to prevent a CbCR from not qualifying. Investment funds must be reported in the tax jurisdictions where they have tax residence. If the investment fund is not a tax resident (e.g., tax transparent funds), it has to be reported as "stateless". The separate reporting of investment funds in the CbCR could result in a double reporting of Profit (Loss) Before Income Tax both in the tax jurisdiction of the investment fund (if a tax resident) and of the owner if the owner reports investments in funds on a mark-to-market basis.

The application of the Safe Harbour Tests on investment funds depends on the treatment of those funds under the OECD Model Rules (e.g., excluded entity, flow-through entity with/without permanent establishment, Constituent Entity with owner in same/other tax jurisdiction and with/without election rights according to art. 7.5 / 7.5 MR) [40].

4.2 Partnerships. Whereas the legacy CbCR uses the term "partnership", the OECD Model Rules and related documents use the (broader) term "flow-through entities". Like investment funds, partnerships must only be reported in the CbCR if they are included in the consolidated financial statements. To the extent that the partnership is not a tax resident in a tax jurisdiction and not attributable to a permanent establishment qualifying as a separate Constituent Entity, it shall be reported separately as "stateless" [41].

4.3 Purchase Price Allocation (PPA). As a result of initial consolidation, various accounting standards (e.g., IFRS 3 – Business Combination) require the assets and liabilities of acquired companies to be remeasured (incl. goodwill). In practice, it can often be observed that these new values are recognised at the level of the acquired companies as well ("pushdown accounting"). The legacy CbCR regulations do not contain any provisions on this, as the reporting MNE group is authorised to choose its own data sources. This does not exclude the use of pushdown accounting values. The qualified CbCR regulation also does not contain any requirements regarding the use of such adjusted values. However, there are certain rules in the regulations on the Safe Harbour Test that nevertheless have an impact on qualified CbCR. Pushdown accounting values can be recognised for

the purpose of the Safe Harbour Test, when the following conditions are met:

- goodwill impairment adjustments must be added back relating to transactions entered after 30 November 2021; and
- the CbCR for the reporting period 2023 and later must include pushdown accounting values unless not permitted by law ("consistent CbCR condition" [42]).

Although the Safe Harbour Test generally only applies as of fiscal year 2024, the consistent CbCR condition must already be satisfied for 2023.

4.4 Transfer Pricing Adjustments. The legacy CbCR regulations are silent on the topic of transfer pricing adjustments. Since the reporting MNE is free to choose the data source, transfer pricing adjustments in the tax return or year-end adjustments (only booked in the next financial year) can be considered in the CbCR. Regarding the qualified CbCR, however, it is mandatory that this is prepared based on Qualified Financial Statements. No adjustments are permitted, which is why no transfer pricing adjustments may be considered. The OECD also explicitly confirmed this understanding once again in the Administrative Guidance of December 2023 [43].

4.5 Anti-Avoidance Rules. Except for dividends that are tax-deductible in the tax jurisdiction of the distributing Constituent Entity, neither the legacy nor the qualified CbCR regulations contain anti-avoidance rules on hybrid arrangements. Though various specific regulations related to arrangements that were entered into after 15 December 2022 [44] were issued as part of the Administrative Guidance of December 2023 (deduction/non-inclusion arrangements, duplicate loss arrangements, duplicate tax recognition arrangements) [45].

5. CONCLUSIONS

Previously, the CbCR had to be prepared and submitted on an annual basis, but it was of little significance in practice. Accordingly, it has sometimes been prepared using an 80/20 approach, partly due to a lack of knowledge regarding the detailed rules and partly due to a lack of data availability within the MNE group. With the introduction of the global minimum tax, and particularly the Safe Harbour Transition Rules, this is now changing and the CbCR will get a new, centre-stage role. Only if the rules, particularly the legacy CbCR provisions, are strictly adhered to will the CbCR qualify and can be used as a basis for the Safe Harbour Transition Rules. ■

Notes: 1) For a detailed overview of the Swiss implementation of CbCR see Stocker, Mauchle, in: Zweifel, Beusch, Oesterhelt (eds.), Amtshilfe, Basel 2020, § 18. **2)** OECD/G20, Administrative Guidance to GloBE Model Rules 12/2023, p. 12 (hereafter "Administrative Guidance 12/2023, p."). **3)** Approach that the CbCR is largely done correctly (80%) and that certain inaccuracies and errors are accepted (20%). **4)** Safe Harbours and Penalty Relief: Global Anti-Base Erosion Rules (Pillar Two), p. 8 (hereafter: "Safe Harbours, p. ..."). **5)** Administrative Guidance 12/2023, p. 13. **6)** OECD/G20, Transfer Pricing Documentation and Country-by-Country Reporting (Action Point 13), p. 31 (hereafter "BEPS 13 Report, p."). **7)** BEPS 13 Report, p. 31. **8)** Art. 1.3 MR. **9)** Art. 10.1.1. MR. **10)** BEPS 13 Report, p. 33. **11)** According to art. 4 of the OECD Model Tax Convention and its accompanying Commentary. **12)** OECD/G20, Guidance on the Implementation of Country-by-Country Reporting (Update Version May 2024), p. 17 (hereafter "CbCR Guidance, p."). **13)** The term "related party" is to be understood as Constituent Entity; CbCR Guidance, p. 7. **14)** BEPS 13 Report, p. 7. **15)** CbCR Guidance, p. 7. **16)** CbCR Guidance, p. 12. **17)** CbCR Guidance, p. 7. **18)** CbCR Guidance, p. 8. **19)** CbCR Guidance, p. 8. **20)** Administrative Guidance 12/2023, pp. 22–23. **21)** CbCR Guidance, p. 33. **22)** Safe Harbours, p. 14. **23)** Safe Harbours, p. 7. **24)** CbCR Guidance, p. 33. **25)** CbCR Guidance, p. 9. **26)** CbCR Guidance, p. 33. **27)** Art. 4.3.2(e) MR. **28)** CbCR Guidance, p. 34. **29)** CbCR Guidance, p. 12. **30)** CbCR Guidance, p. 34. **31)** CbCR Guidance, p. 12. **32)** CbCR Guidance, p. 34. **33)** CbCR Guidance, p. 10. **34)** CbCR Guidance, p. 34. **35)** CbCR Guidance, p. 34. **36)** CbCR Guidance, p. 34. **37)** Art. 5.3.5 MR. **38)** OECD/G20, Consolidated Commentary to the Global Anti-Base Erosion Model Rules (2023), Art. 5 N 49 (hereafter: "GloBE Commentary, Art. ... N ..."). **39)** Art. 5.3.4 MR. **40)** In detail: Rom Ilan, Köhler Birgit, Koyuncu Danielle, Umsetzung der globalen Mindeststeuer – Safe Harbour-Übergangsregelungen für Investmenteinheiten, in: zsis 2/2024, A6 (can be retrieved at: publ.zsis.ch/A6-2024). **41)** CbCR Guidance, p. 17. **42)** Administrative Guidance 12/2023, p. 7. **43)** Administrative Guidance 12/2023, p. 13. **44)** 18 December 2023 in some countries where constitutional grounds apply. **45)** Administrative Guidance 12/2023, p. 13 ff.