

Tax Challenges Arising from the Digitalisation of the Economy – GloBE Information Return (January 2025)

Inclusive Framework on BEPS



OECD/G20 Base Erosion and Profit Shifting Project

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Table of contents

Introduction	4
Annex A1. Data points	13
1 MNE Group Information	14
2 Jurisdictional safe harbours and exclusions – Jurisdictional schedules	18
3 GloBE Computations	22
Annex A2. Explanatory guidance	42
1 MNE Group Information	44
2 Jurisdictional Safe Harbours and Exclusions	54
3 GloBE Computations	60
Annex B. Notification that the GIR will be received under Exchange of Information	93
Annex C. Transitional Penalty Relief	97

Introduction

Overview

1. The GloBE Model Rules provide for the development of a standardised GloBE Information Return (GIR). The GIR contains the information a tax administration needs to perform an appropriate risk assessment and to evaluate the correctness of a Constituent Entity (CE)'s Top-up Tax liability. In particular, Article 8.1.4 of the GloBE Model Rules provides an outline of the information items to be included in the GIR. The rules also provide that this list shall be further specified, expanded or restricted in accordance with the GloBE Implementation Framework, including through the development of simplified reporting procedures. This document sets out a standard template for the GIR that incorporates the edits that have been agreed by the Inclusive Framework on BEPS (“Inclusive Framework”) in the context of Article 8.1.4.

2. In developing the data points and explanatory guidance that are used for the GIR, the Inclusive Framework has sought to strike a balance between providing tax administrations with the data they need to undertake adequate compliance activities, while limiting the cost of compliance for MNE Groups. In particular, the main objective of the Inclusive Framework in developing this standard template for the GIR is to ensure that the information and tax calculations that an MNE Group is required to file under the GIR are sufficiently comprehensive to allow tax administrations to perform an appropriate risk assessment and to evaluate the correctness of a CE's tax liability under the GloBE Rules. At the same time, the Inclusive Framework has sought to avoid imposing unnecessary information collection, computation and reporting requirements on MNE Groups or exposing taxpayers to multiple, uncoordinated requests for further information in each jurisdiction that has implemented either the Income Inclusion Rule (IIR), the UTPR or both (“Implementing Jurisdiction”) or that has only implemented a QDMTT (“QDMTT-only Jurisdiction”). The agreement on a standardised information return does not preclude a tax administration from requesting necessary supporting information in follow-up requests to verify compliance with the GloBE Rules under their domestic law.

3. The obligation to prepare a GIR is separate from the requirement to declare and pay taxes under a tax return. The operation of tax return filing and payment obligation rules is left to the determination of each Implementing Jurisdiction and is generally expected to be in line with those currently required under that jurisdiction's existing tax filing and payment procedures. This means that jurisdictions may, in some cases, require additional data points to be reported beyond the GIR for purposes of the preparation of the tax return (for instance, to convert the Top-up Tax liability into the domestic currency). However, jurisdictions should generally refrain from requiring the reporting of additional data points beyond the GIR as part of their routine tax return and payment requirements and any such information should relate, for instance, to liability, timing and method of payment or identification of the taxpayer and contact details, rather than the calculation of a CE's Top-up Tax liability.

GloBE Information Return

Contents of the GloBE Information Return

4. The GIR consists of a general section, that applies to the MNE Group as a whole, and multiple jurisdictional sections based on a single template that need to be filled in for every jurisdiction where the MNE Group is operating. Annex A1 of this document contains the GIR data points needed to calculate an MNE's GloBE tax liability, while Annex A2 includes the accompanying explanatory guidance for these data points.
5. Under the general section, an MNE Group provides general information about the MNE Group as a whole, identifies the Filing Constituent Entity and outlines its corporate structure. As part of this section, the MNE Group also reports a summary table that provides a high-level overview of the application of the GloBE Rules in respect of every jurisdiction where the MNE Group is operating.
6. The jurisdictional sections provide a template that shall apply for every jurisdiction where the MNE Group is operating. Firstly, a short section requires limited information disclosures in respect of jurisdictions where relevant safe harbours and exclusions apply. For jurisdictions where safe harbours and exclusions do not apply, the MNE Group would report its ETR computations, followed by Top-up Tax computations where necessary, and finally the allocation of Top-up Tax, if any. These jurisdictional sections would also be used for purposes of reporting the calculations undertaken under a Qualified Domestic Minimum Top-up Tax ("QDMTT") that meets the requirements to be considered as a Safe Harbour.
7. The organisation of the GIR in this manner will efficiently facilitate the analysis and exchange of GIR information (as provided under Article 8.1.2 of the GloBE Rules) while at the same time providing tax administrations with the necessary information needed to perform an appropriate risk assessment and evaluate the correctness of a CE's Top-up Tax liability.

Transitional simplified jurisdictional reporting framework

Overview

8. The transitional simplified jurisdictional reporting framework described below allows for a simplified jurisdictional reporting framework that would apply to all Fiscal Years beginning on or before 31/12/2028 but not including a Fiscal Year that ends after 30/6/2030 ("transitional period").
9. The transitional period provides time for MNE Groups to develop the accounting systems and/or processes that will facilitate information collection and reporting on a CE-by-CE basis for GloBE purposes. Upon expiration of the transitional period, in the absence of additional guidance provided by the Inclusive Framework, the simplified jurisdictional reporting framework will no longer be available for MNE Groups. It is expected that, by the end of the transitional period, in-scope MNE Groups will have built their IT and accounting systems to accommodate CE-level reporting and should therefore be in a position to report GIR information on a CE-by-CE basis in each jurisdiction, including the separate reporting of the additions and reductions for each adjustment where required.
10. During the first years of application of the GloBE Rules, tax administrations will apply their experience from audit and compliance activities to assess the level and quality of information obtained in the GIR and consider whether some simplifications to CE-by-CE reporting could apply on a permanent basis. Furthermore, the Inclusive Framework could also

explore additional permanent safe harbours and simplifications, such as in respect of tax consolidated groups not yet covered by a reporting simplification. The reporting requirements under the GIR may need to be adapted to fit with any such changes. The Inclusive Framework will therefore need to review the design and content of the GIR on an ongoing basis to consider whether changes are needed based on these tax administration experiences, the expected improvements in accounting and IT systems and the operation of the rules. If the Inclusive Framework adopts additional reporting requirements to those set out in the current GIR, these new reporting requirements shall not apply before a reasonable period of time, as determined by the Inclusive Framework, that would allow jurisdictions to introduce the changes in their domestic legislation and MNEs to update their accounting and information systems before the Reporting Fiscal Year starts.

Scope

(a) Simplification available for certain jurisdictions where either no Top-up Tax arises or there is no need to allocate the Top-up Tax

11. During the transitional period, MNE Groups can elect for a simplified jurisdictional reporting framework for jurisdictions in respect of which:

- no Top-up Tax liability arises; or
- Top-up Tax liability arises but it does not need to be allocated on a CE-by-CE basis.

For those jurisdictions where the MNE Group has elected the simplified jurisdictional reporting framework, the MNE Group is not required to report all adjustments to the Financial Accounting Net Income or Loss (“FANIL”), current tax expense or deferred tax expense on a CE-by-CE basis (other than in respect of a few enumerated items) and the enumerated CE-by-CE adjustments can be reported on a net basis.

(b) Simplification not available for jurisdictions in respect of which a Top-up Tax liability arises and needs to be allocated on a CE-by-CE basis

12. The transitional simplified jurisdictional reporting framework does not apply for jurisdictions in respect of which a Top-up Tax liability arises and needs to be allocated on a CE-by-CE basis. For these jurisdictions MNE Groups are required to report on a CE-by-CE basis all the relevant adjustments made to determine each CE’s GloBE Income or Loss and Adjusted Covered Taxes as provided in the GIR. These relevant adjustments shall separately identify the additions and reductions for each of these adjustments. These additions and reductions shall be reported in line with guidance to be agreed by the Inclusive Framework.

Implications for MNE Groups

13. The transitional simplified jurisdictional reporting framework addresses a key business concern, recognizing that currently many MNE Groups do not have the information collection and reporting systems that would allow them to isolate the FANIL of each CE in each jurisdiction or to tie each GloBE adjustment back to a specific CE located in that jurisdiction. The transitional simplified jurisdictional reporting framework allows MNE Groups to report GloBE information at a jurisdictional level for a defined period while ensuring that the simplified jurisdictional reporting requirements do not affect the calculations required to be undertaken for GloBE purposes. When a specific Article of the GloBE Rules requires a calculation to be undertaken at the CE level, for instance, this calculation still needs to be done at the CE level even if the information is then reported in an aggregated format in the GIR.

14. MNE Groups that elect to report jurisdictional data during the transitional period would be expected to have:

- a) An accounting system that facilitates a jurisdictional approach and enables them to accurately and reliably undertake the GloBE calculations as required under the GloBE Rules, including identifying the correct location for each CE and applying the rules on a CE-by-CE basis where relevant to the GloBE ETR and Top-up Tax calculation;
- b) A process in place which reliably allocates accounting information to jurisdictions and ensures aggregation into the Consolidated Financial Statements; and
- c) A process in place to identify all GloBE-relevant adjustments in each jurisdiction on an item-by-item basis and to identify a particular item as belonging to a CE where the identity of the CE is relevant to the accuracy of the GloBE adjustment.

15. MNE Groups would be expected to prepare on a contemporaneous basis supporting information which would include the documentation of the process by which accounting information is allocated to each jurisdiction (and to each CE where this is needed) and aggregated in the Consolidated Financial Statements, as well as the process by which the relevant adjustments are identified and calculated. In any case, the supporting workpapers or breakdown of adjustments that a tax administration could ask to provide in a follow-up request would not be required to be in a standard format.

Implications for tax administrations

16. In addition to the information required to be provided in the GIR, it is expected that tax administrations may request further information from MNE Groups by way of follow-up requests in order to verify the accuracy of the Top-up Tax liability computations and in accordance with their usual risk assessment and compliance procedures. The transitional simplified jurisdictional reporting framework will not limit any rights of tax authorities to request information as part of follow-up information requests, including with respect to CE-by-CE information following review of the adjustments reported by the MNE Group. The Inclusive Framework will monitor tax administration experiences with information reporting and risk assessment under GloBE as part of a coordinated and consistent compliance framework. In particular, the Inclusive Framework will explore a possible process for co-ordinating these follow-up information requests under applicable international agreements that by their terms provide legal authority for the exchange of tax information between jurisdictions in the context of the development of the Administrative Framework for the GIR (see also below under next steps).

Dissemination of GloBE Information

17. The GIR is a comprehensive return that contains the information on the tax calculations made by the MNE Group to determine their Top-up Tax liability or to justify the absence of such a liability. All Implementing Jurisdictions will not use the information for the same purpose and may not need all of the information filed as part of the GIR to administer their GloBE Rules. For instance, an MNE Group with Parent Entities located in Implementing Jurisdictions may only have a Top-up Tax liability in a limited number of jurisdictions and the calculation and allocation of the Top-up Tax liability in each Implementing Jurisdiction will differ depending on the MNE Group's structure and the requirements of rule order.

18. The Inclusive Framework has categorised the information to be made available to each Implementing Jurisdiction or QDMTT-only Jurisdiction on the basis of the CEs located in such jurisdiction and the MNE Group structure (see below). In addition, the Inclusive Framework has

considered the implications of the MNE Group filing its GIR with each tax administration (“local filing”) or with a single tax administration which exchanges the GIR with other tax administrations under a Qualifying Competent Authority Agreement (“central filing”). In those cases where an Implementing Jurisdiction cannot rely on the central filing and exchange mechanism, local filing may be required. Given that the GIR is in a standardised format, an MNE Group would provide the same information to a tax administration regardless of whether the GIR is filed centrally and subsequently exchanged or filed locally. To achieve this outcome, jurisdictions imposing local filing would not require a Constituent Entity to report information that is different from what they would receive pursuant to exchange of information. The Inclusive Framework will consider developing guidance to provide further details on how the dissemination approach will apply in practice.

19. Building on these considerations, the Inclusive Framework has adopted the following dissemination approach for purposes of the GIR that applies a targeted approach for each MNE Group, whereby:

- The jurisdiction of the UPE is provided with the GIR as a whole;
- Jurisdictions with taxing rights under the GloBE Rules are provided with the sections of the GIR that relate to the ETR and Top-up Tax computation, allocation and attribution for those jurisdictions in respect of which they have taxing rights (including jurisdictions that have introduced a QDMTT); and
- All Implementing Jurisdictions where CEs of the MNE Group are located are provided with general information and the corporate structure, which covers all the data points necessary to verify whether they have any taxing rights over any other jurisdiction under the GloBE Rules.

20. The GIR for an MNE Group will include GloBE calculations for all jurisdictions in which the MNE Group has CEs, including those jurisdictions that have not adopted the GloBE Rules. The dissemination approach set out below ensures that information on these calculations is made available to Implementing Jurisdictions with taxing rights under the GloBE Rules. It does not, however, consider the position of non-implementing jurisdictions in respect of the receipt or exchange of GIR information. The treatment of such jurisdictions will be considered further by the Inclusive Framework as part of the administrative framework.

21. The information to be disseminated to Implementing Jurisdictions or QDMTT-only Jurisdictions under this approach is described in further detail below. For purposes of operationalising the dissemination approach, the MNE Group shall identify the categories in which each Implementing Jurisdiction or QDMTT-only Jurisdiction where it has CEs falls, as well as the relevant sections and data points of the GIR which shall be provided to each Implementing Jurisdiction or QDMTT-only Jurisdiction. The tax administration with which the GIR is filed centrally will use the MNE Group’s designations as the basis for disseminating the GIR information. However, the MNE Group may also opt for the whole GIR to be exchanged with all Implementing Jurisdictions or QDMTT-only Jurisdictions where it has CEs. The Inclusive Framework may also consider developing guidance on the role of the central filing tax administration and how the dissemination of GloBE Information shall be performed to facilitate further coordination and consistent application of the GloBE Rules.

Jurisdiction of UPE

22. As further explained below, where the UPE Jurisdiction is an Implementing Jurisdiction, it will usually need all of the GIR data points to assess the application of the rules across the MNE Group, given that the IIR applies primarily at the UPE level. In addition, it is expected that

the UPE jurisdiction has specific information collection mechanisms that could allow its tax administration to access the information provided in the GIR in respect of other jurisdictions. Therefore, the UPE Jurisdiction would be provided with the whole GIR under the dissemination approach.

Jurisdictions with taxing rights under GloBE rule order

23. Jurisdictions with taxing rights under the GloBE Rules are those where the MNE Group is not only subject to the GloBE Rules but is also required to apply the GloBE Rules in accordance with the rule order. Those jurisdictions also include QDMTT jurisdictions. Those jurisdictions need to be able to verify the accuracy of the calculations undertaken by the MNE Group and of the Top-up Tax liability arising in their jurisdiction. Therefore, those jurisdictions are provided with the information necessary to compute the ETR and Top-up Tax, including its allocation and attribution among Implementing Jurisdictions as provided under Article 8.1.4(c), for those jurisdictions in respect of which they have taxing rights. Implementing Jurisdictions where the MNE has CEs are provided with the general information and corporate structure of the MNE Group. Under certain conditions, a QDMTT-only Jurisdiction is provided with the General Section (i.e. Section 1 of the GloBE Information Return), with the exception of Section 1.4 providing the high-level summary of GloBE information. These conditions are met when (i) Constituent Entities of the MNE Group are located in the QDMTT jurisdiction, (ii) a Joint Venture or a member of a JV Group of the MNE Group is located in the QDMTT jurisdiction and the QDMTT is imposed in respect of Joint Ventures located in this jurisdiction, or (iii) the QDMTT is imposed in respect of a Stateless Constituent Entity or Stateless Joint Venture of the MNE Group.

24. An Implementing Jurisdiction has taxing rights in respect of another where, under the rule order provided in the GloBE Rules, the Jurisdictional Top-up Tax computed in respect of the latter jurisdiction would result in a Top-up Tax liability due under the charging provisions in the former jurisdiction, even if no Top-up Tax liability actually arises (e.g. because the ETR of the latter jurisdiction is above the Minimum Rate). Whether an Implementing Jurisdiction has taxing rights under the GloBE Rules in respect of another will therefore depend on the rules applicable in other jurisdictions where the MNE Group has CEs and whether such rules are recognised as being qualified. This is because the rule order only applies when jurisdictions have qualified rules as defined under the GloBE Rules.

25. An Implementing Jurisdiction or QDMTT-only Jurisdiction may have Top-up taxing rights in respect of itself. This is the case when a jurisdiction applies an Income Inclusion Rule or a QDMTT to domestic entities. A jurisdiction with a QDMTT (including where the QDMTT is eligible for the QDMTT Safe Harbour) is considered as having taxing rights in respect of its own jurisdiction and therefore provided with the Jurisdictional Section in respect of its own jurisdiction when the QDMTT can be imposed on Constituent Entities or Joint Ventures or members of a JV Group of the MNE Group. Furthermore, a QDMTT jurisdiction is provided with Section 3 of the GIR for the Stateless Constituent Entity that is selected in 3.1.2 when the QDMTT is imposed in respect of that Stateless Constituent Entity. The Inclusive Framework will consider providing guidance on the taxing rights arising in respect of a QDMTT Safe Harbour jurisdiction, as well as the taxing rights arising in respect of a Stateless Constituent Entity or Stateless Joint Venture that is subject to a jurisdiction's QDMTT that is eligible for the QDMTT Safe Harbour.

26. Several Implementing Jurisdictions may have taxing rights in respect of the same jurisdiction. This may be the case, for instance, when both the UPE and a Partially-Owned Parent Entity (POPE) are required to apply the IIR in respect of a CE located in a third

jurisdiction. In that case, both the UPE Jurisdiction and the POPE jurisdiction have taxing rights and an offsetting mechanism applies to avoid double taxation under Article 2.3. Equally, UTPR Jurisdictions would all have taxing rights in respect of the jurisdictions for which the Top-up Tax is not reduced to zero under Article 2.5 (rule order). As mentioned above, UTPR Jurisdictions would be considered as having taxing rights in respect of those other jurisdictions even if no Top-up Tax actually arises in respect of those jurisdictions. However, UTPR Jurisdictions with a UTPR Percentage of zero are only provided with the excerpt of Section 3.4.3 of the GIR that contains information on the attribution of Top-up Tax under the UTPR in respect of that jurisdiction.

27. An Implementing Jurisdiction may also have taxing rights in respect of part of the operations of an MNE Group only. For instance, a POPE may hold an Ownership Interest in a single other CE and its taxing rights would be limited to the jurisdiction where that CE is located. In those situations where some entities are excluded from the MNE Group's ETR and Net GloBE Income (e.g., Minority-Owned Constituent Entities), the taxing rights would be determined in connection with each subgroup or entity for which a separate Top-up Tax calculation would apply.

All implementing jurisdictions and QDMTT-only Jurisdictions

28. All Implementing Jurisdictions or QDMTT-only Jurisdictions where the MNE Group has CEs that are subject to the rules need to assess whether the MNE Group is required to apply the rules in their jurisdictions and verify whether they would have been the only jurisdiction with taxing rights on the basis of the applicable rules and the corporate structure of the MNE Group. Therefore, in addition to the general information relating to the identification of the MNE Group and the Reporting Fiscal Year covered by the GIR, the corporate structure is provided to every Implementing Jurisdiction or QDMTT-only Jurisdiction where the MNE Group has CEs.

29. The corporate structure included in the GIR provides information on the ownership structure of each CE of the MNE Group, as well as the rules applicable in each jurisdiction and the status of each CE under the GloBE Rules (e.g., POPE, Excluded Entity, etc). This information allows every Implementing Jurisdiction or QDMTT-only Jurisdiction to assess whether they have taxing rights in respect of every CE and member of a JV Group of the MNE Group. Jurisdictions with taxing rights in respect of another jurisdiction will use the corporate structure not only to assess whether they have such rights but also in order to verify the application of the jurisdictional blending and allocation of income and taxes from one CE to another.

30. In addition to the general information relating to the identification of the MNE Group and the corporate structure, all Implementing Jurisdictions where the MNE Group has CEs are also provided with high-level information designed to provide an overview of the application of the GloBE Rules in respect of the MNE Group. This high-level information allows all Implementing Jurisdictions to identify the range in which the ETR calculated for each jurisdiction falls (broken down into 2.5% increments for ETRs from 0% up to 30%, and otherwise reported as above 30%); and if the ETR was not computed in respect of a jurisdiction, on which exception the MNE Group has relied (e.g., safe harbour or de minimis exclusion). This high level information also includes an indication of those jurisdictions where the MNE Group has no Excess Profit because the Substance-based Income Exclusion exceeded the Net GloBE Income of the jurisdiction and a disclosure of the magnitude of the amounts of Top-up Tax payable under each of the QDMTT and the GloBE Rules in respect of each jurisdiction, shown on a scale that indicates either no Top-up Tax payable or, if payable, amounts below EUR 1 million, below EUR 5 million, below EUR 25 million, below EUR 50 million, below EUR 75 million, below EUR 100 million, below

EUR 250 million and at or above EUR 250 million. This high-level information, however, is not provided to QDMTT-only Jurisdictions.

31. Finally, the reporting of aggregated GIR data on an anonymised basis will be considered as part of the peer review and monitoring process to be developed by the Inclusive Framework, such as the GloBE Income, Adjusted Covered Taxes, ETR, the Substance-based Income Exclusion, as well as Top-up Taxes. The monitoring process would also provide visibility over whether any benefits are provided by jurisdictions that are related to the GloBE Rules or the QDMTT. This will be considered in addition to developing other mechanisms to facilitate ongoing monitoring to ensure jurisdictions are applying and administering the GloBE Rules in a manner consistent with the outcomes provided for under the GloBE Rules and pursuant guidance.

Notification that the GIR will be received under Exchange of Information (Annex B)

32. Under Article 8.1.1 of the GloBE Rules, each Constituent Entity located in an Implementing Jurisdiction shall file the GloBE Information Return (GIR) with the tax administration in the local jurisdiction. However, to ease the compliance burden placed on MNE Groups, a Constituent Entity is not obligated to file a GIR with the local tax administration if a GIR conforming to the requirements of Articles 8.1.4 to 8.1.6 is filed by an Ultimate Parent Entity (UPE) or a Designated Filing Entity (DFE) that has a Qualifying Competent Authority Agreement (QCAA) in effect with the local jurisdiction (as of the GIR filing deadline of the local jurisdiction) for the Reporting Fiscal Year.

33. The exchange of the GIR under a QCAA is expected to occur three months after the filing deadline of the GIR in the UPE or DFE jurisdiction. If a GIR is not being filed locally, the Constituent Entity will notify the tax administration from which jurisdiction it will receive the GIR under a QCAA. Article 8.1.3 serves this purpose; it requires that a Constituent Entity or the Designated Local Entity notify the tax administration the identity of the Entity that will be filing the GIR and the jurisdiction in which it is located. Therefore, every Implementing Jurisdiction or QDMTT-only Jurisdiction that may receive the GIR through an active exchange relationship under a QCAA could develop notification requirements for purposes of Article 8.1.3. Annex B lays out the merits and content of a standard Article 8.1.3 notification template that Implementing Jurisdictions or QDMTT-only Jurisdictions could use for this purpose.

Transitional Penalty Relief (Annex C)

34. The penalty relief described in Annex C is designed to provide transitional relief for MNE groups in the initial years during which the GloBE Rules come into effect. It reflects a common understanding amongst Implementing Jurisdictions and QDMTT-only Jurisdictions on the necessity to provide relief to taxpayers in those cases where an MNE has taken reasonable measures to ensure the correct application of the GloBE Rules and the QDMTT.

35. A common understanding on penalty relief is intended to provide MNEs (and those responsible for managing its tax compliance obligations) with a “soft-landing” during the initial years in which the rules are being introduced. This soft landing will allow MNEs and tax administrations to familiarize themselves with the rules and develop the data collection and the reporting and compliance systems to comply with the new rules without the risk of being penalised for making reasonable mistakes.

Recent developments and next steps

36. As mentioned above, the requirement for each CE to file a GIR with each tax administration is removed when the UPE or a Designated Filing Entity files the GIR with the tax administration of the jurisdiction where it is located and there is a Qualifying Competent Authority Agreement in effect by the filing deadline to exchange GloBE information with the jurisdiction of the CE. Input received in the last public consultation on the GloBE Implementation Framework indicated strong support for a single point of filing followed by the exchange of GloBE information between tax administrations. These centralised filing requirements and the appropriate mechanisms to allow tax administrations to automatically exchange GloBE information collected will be supported by a framework of Qualifying (bilateral or multilateral) Competent Authority Agreements and IT-solutions to support the exchange of information. For that purpose, a Multilateral Competent Authority Agreement and a dedicated XML Schema have now been developed and the Inclusive Framework will consider providing guidance on the appointment of a Designated Filing Entity.

37. The Inclusive Framework will also explore the possibility of developing other administrative mechanisms to facilitate further coordination and consistent application of the GloBE Rules. For instance, work could be undertaken to develop a coordinated framework for further information requests in respect of risks identified based on the information in the GIR. Equally, Implementing Jurisdictions could conduct coordinated risk assessment activities on the basis of the information provided in the GIR in order to determine whether further actions such as a tax audit are required.

Annex A1. Data points

1 MNE Group Information

1.1 Identification of the Filing Constituent Entity

1. UPE is the Filing Constituent Entity Yes/No	2. Name of the Filing Constituent Entity	3. Tax identification number	4. Role	5. Jurisdiction where the Filing CE is located	6. Recipient Jurisdictions for Exchange of Information (if relevant)

1.2 MNE Group General Information

1.2.1 MNE Group and Reporting Fiscal Year

1. Name of the MNE Group	2. Start date of the Reporting Fiscal Year	3. End date of the Reporting Fiscal Year	4. Amended Return Yes/No

1.2.2 MNE General accounting information

1. Consolidated Financial Statements of the UPE (type)	2. Financial Accounting standard used for the CFS of the UPE	3. Presentation currency used for the CFS of the UPE (ISO code)

1.3 Corporate Structure

1.3.1 Ultimate Parent Entity

1. UPE Jurisdiction	
2. Applicable rules?	
3. Name of the UPE	
4. TIN of the UPE	
5. TIN of the UPE in the Filing Jurisdiction (if different, and if any)	
6. Status for GloBE purposes	
7. If the UPE is an Excluded Entity - Type	
8. Art. 10.3.5 Jurisdiction (if any)	

1.3.2 Group Entities (other than the UPE) and members of JV Groups

1.3.2.1 Constituent Entities and members of JV Groups

Changes	1. Changes from previous Reporting Fiscal Year?	Yes/No
Jurisdiction	2. Jurisdiction	
	3. Applicable rules?	
Identification of the Constituent Entity, JV or JV Subsidiary	4. Name of Constituent Entity, JV or JV Subsidiary	
	5. TIN	
	6. TIN for filing jurisdiction (if any)	
	7. Status for GloBE purposes	
Ownership structure of the Constituent Entity, JV or JV Subsidiary	For each entity holding Ownership interests in the Constituent Entity, JV or JV Subsidiary: 8. Type 9. TIN (for CEs or members of JV Groups) 10. Ownership interest held (percentage)	
If the CE is a POPE or an Intermediate Parent Entity, is the Entity required to apply a QIIR?	11. Parent Entity Status 12. If the exception provided in Article 2.1.3 shall apply, such that the UPE applies the IIR or there is another Intermediate Parent Entity required to apply the IIR, identify the UPE or the other Intermediate Parent Entity (TIN) 13. If the exception provided in Article 2.1.5 shall apply, identify the other POPE required to apply a QIIR (TIN)	Yes/No
Is UTPR applicable in respect of the entity?	14. Initial phase of International Activity (Article 9.3.1 or Article 9.3.5 (a)) applicable? 15. Aggregate Ownership Interests (respectively Allocable Share of Top-up Taxes) of Parent Entities required to apply a QIIR in respect of the CE (respectively member of JV Group) (in percentage) 16. Are the UPE's Ownership Interests in the CE (respectively UPE's allocable share of Top-up Tax for the member of JV Group) greater the aggregate Ownership Interests (respectively allocable share) of Parent Entities required to apply a QIIR in that CE (respectively member of JV group)?	Yes/No

1.3.2.2 Excluded Entities

1. Changes from previous Reporting Fiscal Year?	Yes/No
2. Name of the Excluded Entity	
3. Type of the Excluded Entity	

1.3.3 Changes in the corporate structure that occurred during the Reporting Fiscal Year

a. Were changes in the corporate structure that occurred during the Reporting Fiscal Year not reported because they neither affected the ETR computation or the computation or allocation of Top-up Tax?	Yes/No
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1. Name of the Constituent Entity (or other Entity of the MNE Group) or member of JV Group	2. TIN	3. Effective Date of the change	4. Status for GloBE purposes before the change	5. Status for GloBE purposes after the change	6. Entities holding Ownership interests in that CE (or other Entity) or member of JV Group before or after the change	7. Ownership Interests held in that CE (or other Entity) or member of JV Group before the change (Percentage)	8. Ownership Interests held in that CE (or other Entity) or member of JV Group after the change (Percentage)

1.4 High-level summary of GloBE Information

1. Name of the jurisdiction	2. Type of subgroup (if any)	3. Identification of subgroup (if any)	4. Name(s) of jurisdiction(s) with taxing rights	5. Safe harbour or exclusion applied?	6. ETR range	7. Has application of Substance-based Income Exclusion resulted in no Top-up Tax arising? Yes/No	8. Top-up payable (QDMTT) – range	9. Top-up payable (GloBE Rules) – range	Tax relevant (GloBE relevant option)
				[Insert option]	[Insert relevant option]	Yes/No	[Insert relevant option]	[Insert relevant option]	[Insert relevant option]

2 Jurisdictional safe harbours and exclusions – Jurisdictional schedules

Jurisdictional safe harbours and exclusions – Jurisdictional schedules

The Filing Constituent Entity shall complete Section 2 on a jurisdictional basis, for each jurisdiction where exceptions to the GloBE computation apply.

2.1. Characteristics of the jurisdiction

1. Name of the jurisdiction	
2. Type of subgroup (if any)	
3. Identification of subgroup (if any)	
4. Jurisdiction with taxing rights	
5. Existence of reportable differences (Yes/No)	

2.2. Jurisdictional exceptions applicable in respect of this jurisdiction (Top-up Tax reduced to zero)

2.2.1. Safe harbour jurisdiction election

2.2.1.1 Safe harbour election

1. Safe Harbour elected	[insert the relevant option]
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2.2.1.2 Permanent safe harbours

(a) Simplified Calculation for Non-material Constituent Entities

	1. Total Revenue of all NMCEs in the jurisdiction	2. Aggregate Simplified Tax of all NMCEs in the jurisdiction
a. Reporting Fiscal Year		
b. 1 st preceding Fiscal Year (if applicable)		n.a.
c. 2 nd preceding Fiscal Year (if applicable)		n.a.
d. Average of the three Fiscal Years (if applicable)		n.a.

2.2.1.3 Transitional safe harbours

(a) Transitional CbCR safe harbour

1. Total Revenue	
2. Profit (Loss) before Income Tax	
3. Simplified Covered Taxes	

(b) Transitional UTPR safe harbour

1. Corporate income tax rate	
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2.2.2. Election for de minimis exclusion

- Election to apply the de minimis exclusion for the Reporting Fiscal Year
- Simplified Calculations for Non-material Constituent Entities – Constituent Entities that are not NIMCEs

	1. Revenue (Financial Accounts)	2. GloBE Revenue	3. Financial Accounting Net Income (or Loss)	4. GloBE Income (or Loss)
a. Reporting Fiscal Year				
b. 1st preceding Fiscal Year (if applicable)				
c. 2nd preceding Fiscal Year (if applicable)				
d. Average of the three Fiscal Years				

2.3. MNE Group in the initial phase of international activity (if applicable)

1. First day of the First Fiscal Year in which the MNE Group originally came within the scope of GloBE Rules	
2. Reference Jurisdiction	
3. Net Book Value of Tangible Assets in Reference Jurisdiction for the Fiscal Year in which the MNE Group originally comes within the scope of GloBE Rules	
4. Number of jurisdictions where the MNE Group has Constituent Entities for the Fiscal Year in which the MNE Group originally comes within the scope of GloBE Rules	
5. Tangible Assets of Constituent Entities located outside the Reference Jurisdiction for the Fiscal Year in which the MNE Group originally comes within the scope of GloBE Rules	<p>a. Jurisdiction</p> <p>b. Net Book Values of Tangible Assets of all Constituent Entities located in each jurisdiction</p>
6. Number of jurisdictions where the MNE Group has Constituent Entities during the Reporting Fiscal Year	
7. Sum of the Net Book Values of Tangible Assets of all Constituent Entities located in other jurisdictions than the Reference Jurisdiction during the Reporting Fiscal Year	

3 GloBE Computations

GloBE Computations – Jurisdictional schedules

The Filing Constituent Entity shall complete Section 3 on a jurisdictional basis, for each jurisdiction (or subgroup, where relevant) where exceptions to the GloBE computation do not apply.

3.1. Characteristics of the jurisdiction

1. Name of the jurisdiction	
2. Type of subgroup (if any)	
3. Identification of subgroup (if any) for the ETR and Top-up Tax computation	
4. Jurisdictions with taxing rights	
5. ETR	
6. Adjusted Covered Taxes	
7. Net GloBE Income or Loss	
8. Substance-based Income Exclusion	
9. Additional Current Top-up Tax	
10. Top-up Tax amount under domestic legislation	

11. Elections	
12. Aggregate current tax expense with respect to Covered Taxes after allocations in Article 4.3	
13. Qualified Refundable Tax Credits or Marketable Transferable Tax Credits (tax expense)	
14. Other tax credits (tax expense)	
15. Deferred tax expense amount	
16. Qualified Refundable Tax Credits or Marketable Transferable Tax Credits (income)	
17. Excess Negative Tax Expense Carry Forward	
18. Transition Rules	

3.2. ETR computation

3.2.1. ETR

a. Financial Accounting Net Income or Loss	b. Net GloBE Income or Loss	c. Income tax expense	d. Adjusted Covered Taxes	e. ETR
	[A]		[B]	[C]=[B]/[A]

3.2.1.1 Computation of GloBE Income (Loss)

1. Aggregate FANIL amount after allocations in Articles 3.4 and 3.5 (All CEs in the jurisdiction)	
2. Adjustments	Net amount
(a) Net Taxes Expense - Article 3.2.1 (a)	
(b) Excluded Dividends – Article 3.2.1 (b)	
(c) Excluded Equity Gain or Loss – Article 3.2.1 (c)	
(d) Included Revaluation Method Gain or Loss – Article 3.2.1 (d)	

(e)	Gain or loss from disposition of assets and liabilities excluded under Article 6.3 – Article 3.2.1 (e)
(f)	Asymmetric Foreign Currency Gains or Losses – Article 3.2.1 (f)
(g)	Policy Disallowed Expenses – Article 3.2.1 (g)
(h)	Prior Period Errors – Article 3.2.1 (h)
(i)	Changes in Accounting Principles – Article 3.2.1(h)
(j)	Accrued Pension Expense – Article 3.2.1 (i)
(k)	Debt releases - Article 3.2.1
(l)	Stock-based compensation – Article 3.2.2
(m)	Arm's length adjustments – Article 3.2.3
(n)	Qualified Refundable Tax Credit or Marketable Transferable Tax Credit – Article 3.2.4
(o)	Election for Gains and losses using realisation principle – Article 3.2.5
(p)	Election for Adjusted Asset Gain – Article 3.2.6
(q)	Intragroup Financing Arrangement expense – Article 3.2.7
(r)	Election for intragroup transactions in same jurisdiction – Article 3.2.8
(s)	Insurance company taxes charged to policyholders – Article 3.2.9
(t)	Increase/decrease to equity attributed to Additional Tier One and Restricted Tier One Capital distributions paid/payable or received/receivable – Article 3.2.10
(u)	Constituent Entities joining and leaving an MNE Group – Article 3.2.11 and 6.2
(v)	Reduction of GloBE Income of the UPE that is a Flow-through Entity – Article 3.2.11 and 7.1
(w)	Reduction of GloBE Income of the UPE that is subject to a Deductible Dividend Regime – Article 3.2.11 and 7.2
(x)	Taxable Distribution Method election – Article 3.2.11 and 7.6
(y)	International Shipping Income – Article 3.3
(z)	Transactions between Constituent Entities – Article 9.1.3
3. Net GloBE Income (Loss) of the Jurisdiction	

3.2.1.2 Computation of Adjusted Covered Taxes

(a) Total amount of Adjusted Covered Taxes

	Net amount
1. Aggregate Current tax expense with respect to Covered Taxes after allocations in Article 4.3 (All CEs in the jurisdiction)	
2. Adjustments	
(a) Covered Tax accrued as an expense in the profit before taxation in the financial accounts - Article 4.1.2 (a)	
(b) GloBE Loss Deferred Tax Asset established under Article 4.5.1 or used – Article 4.1.2 (b) combined with Article 4.5.3	
(c) Covered Taxes for uncertain tax position recorded as a reduction to Covered Taxes in prior year – Article 4.1.2 (c)	
(d) Qualified Refundable Tax Credit or Marketable Transferable Tax Credits recorded as a reduction to current tax expense – Article 4.1.2 (d)	
(e) Qualified Flow-through Tax Benefits of Qualified Ownership Interests – Article 3.2.1 (c)	
(f) Current tax expense on income excluded from GloBE Income or Loss – Article 4.1.3 (a)	
(g) Non-Qualified Refundable Tax Credit, Non-Marketable Transferable Tax Credit or Other Tax Credits not recorded as a reduction to current tax expense – Article 4.1.3 (b)	
(h) Covered Taxes refunded or credited (except for any Qualified Refundable Tax Credit, or Marketable Transferable Tax Credits) not treated as an adjustment to current tax expense – Article 4.1.3 (c)	
(i) Current tax expense related to uncertain tax position– Article 4.1.3 (d)	
(j) Current tax expense not expected to be paid within three years – Article 4.1.3 (e)	
(k) Post-filing adjustments – Article 4.6.1	
(l) Covered Taxes relating to Net Asset Gain or Net Asset Loss – Article 3.2.6	
(m) Reduction of Covered Taxes of the UPE that is a Flow-through Entity – Article 7.1	
(n) Covered Taxes for GloBE Income of the UPE that is reduced under a Deductible Dividend Regime – Article 7.2.2	
(o) Deemed Distribution Tax– Article 7.3	
(p) Taxable Distribution Method election – Article 7.6	
(q) Total Deferred Tax Adjustment Amount – Article 4.1.1(b)	

(r)	Increase or decrease in Covered Taxes recorded in equity or Other Comprehensive Income relating to amounts included in GloBE Income or Loss that will be subject to tax under local tax rules – Article 4.1.1 (c)	
(s)	Excess Negative Tax Expense Carry Forward generated – Article 4.1.5 and 5.2.1	
(t)	Decrease in Covered Taxes (but not below zero) by the remaining balance of the Excess Negative Tax Expense Carry-forward – Article 4.1.5 and 5.2.1	
3. Adjusted Covered Taxes		

(b) Excess Negative Tax Expense Carry-forward

1.	Balance from prior years	[A]
2.	Excess Negative Tax Expense Carry-forward generated in the reporting fiscal year	[B]
3.	Excess Negative Tax Expense Carry-forward utilised for the reporting fiscal year	[C]
4.	Excess Negative Tax Expense Carry-forward remaining for subsequent years	[D]=[A]+[B]-[C]

(c) Transitional Blended CFC Regime calculation (if any)

1. CFC Jurisdictions	2. Subgroup	3. Aggregated taxes allocated to that subgroup under a Blended CFC Tax Regime
Total		

3.2.2. Jurisdictional computations relating to deferred tax accounting

3.2.2.1 Deferred Tax adjustments

(a) High-level summary

	a. Deferred tax expense in the financial accounts	[A]
	b. Deferred tax expense in relation to assets or liabilities for which the GloBE carrying value is different to the accounting carrying value	[B]
	c. Deferred tax expense based on the GloBE carrying value of assets or liabilities	[C]
	d. Deferred tax expense for GloBE purposes before recasting and adjustments	[D]=[A]- [B]+[C]
2. Total amount of the adjustments		[E]
	e. Deferred Tax expense for GloBE purposes before recasting	[F]=[D]+[E]
	f. Difference between deferred tax expense recorded at a lower tax rate than the Minimum Rate and recast at Minimum Rate	[G]
3. Recasting the deferred tax expense to the Minimum Rate	g. Difference between the deferred tax expense recorded at a higher tax rate than the Minimum Rate and recast at Minimum Rate	[H]
4. Total Deferred Tax Adjustment Amount		[I]=[F]+[G]-[H]

(b) Breakdown of the adjustments

1. Adjustments to deferred tax expense	Net amount
(a) Deferred tax expense related to items excluded from GloBE Income or Loss – Article 4.4.1 (a)	
(b) Deferred tax expense related to Disallowed Accruals– Article 4.4.1 (b)	
(c) Deferred tax expense related to Unclaimed Accruals – Article 4.4.1 (b)	
(d) Valuation adjustment or accounting recognition adjustment related to a deferred tax asset – Article 4.4.1 (c)	

(e)	Deferred tax expense arising from a re-measurement related to changes in the tax rate – Article 4.4.1 (d)
(f)	Deferred tax expense related to the generation and use of tax credits – Article 4.4.1 (e)
(g)	Substitute Loss Carry Forward DTA or deemed Substitute Loss Carry Forward DTA – Article 4.4.1 (e)
(h)	Disallowed Accruals or Unclaimed Accruals paid during the fiscal year – Article 4.4.2 (a)
(i)	Recapture Deferred Tax Liability paid during the fiscal year – Article 4.4.2 (b)
(j)	Recognition of a loss Deferred Tax Asset not included in the financials – Article 4.4.2 (c)
(k)	Deferred tax expense adjustment resulting from a reduction to a tax rate – Article 4.6.2
(l)	Deferred tax expense adjustment resulting from an increase to a tax rate – Article 4.6.3
(m)	Constituent Entities joining and leaving an MNE Group – Article 6.2
(n)	Deferred tax expense of the UPE that is a Flow-through Entity – Article 7.1
(o)	Deferred tax expense of the UPE that is subject to Deductible Dividend Regime – Article 7.2
(p)	Deferred tax adjustment resulting from transactions between Constituent Entities – Article 9.1.3
2.	Total amount of the adjustments
	[E]

(c) Loss carry backs

	1. Deemed deferred tax assets attributable to loss carry backs	2. Covered Tax refund relating to loss carry backs
a.	Amount attributed to Prior Fiscal Year X	
b.	Amount attributed to Prior Fiscal Year Y, etc.	
c.	Total	

3.2.2.2 Recapture mechanism

(a) Annual amount of DTLs subject to recapture rule

1.	Amount of DTLs subject to recapture rule claimed in the fifth Fiscal Year preceding the Reporting Fiscal Year
2.	Amount of Recaptured Deferred Tax Liability determined in the Reporting Fiscal Year in relation to the fifth Fiscal Year preceding the Reporting Fiscal Year

3. Amount of DTLs subject to recapture rule claimed for the Reporting Fiscal Year	
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(b) Aggregate DTL recapture accounts

	1. Reporting Fiscal Year	2. Prior Fiscal Year
a. Amount of pre-Transition Year DTLs		
b. Amount of Outstanding Balance		
c. Amount of Unjustified Balance		

3.2.2.3 Transition rules

1. Transition Year	
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(a) Application of Article 9.1.1 and 9.1.2.

Deferred tax liabilities	
1. Deferred tax liabilities at the beginning of the Transition Year	2. Deferred tax liabilities recast at the Minimum Rate (if applicable)

Deferred tax assets			
3. Deferred tax assets at the beginning of the Transition Year	[A]	4. Deferred tax assets recast at the Minimum Rate (if applicable)	[B]
		5. Deferred tax assets arising from excluded items under Article 9.1.2	[C]
		6. Deferred tax assets taken into account for GloBE purposes	[D] = [(A) or (B), if applicable] - (C)

(b) Application of Article 9.1.3.

1. Jurisdiction of the disposing entities	2. Tax paid in respect of the transaction(s)	3. Net Deferred tax asset or liability reflected in the financial accounts of the disposing CE(s)	4. Carrying Value of the transferred assets for GloBE purposes	5. Net Deferred tax asset or liability is determined with respect to the transferred assets for GloBE purposes for acquiring CE(s)
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3.2.3. Jurisdictional elections (if any)

3.2.3.1 Jurisdictional elections (other than Article 7.3.1)

(a) Elections

1. Annual elections			
a. Aggregate asset gain election (Article 3.2.6)			<input type="checkbox"/>
b. Immaterial decrease in Covered Taxes election (Article 4.6.1)			<input type="checkbox"/>
c. Election not to apply the Substance-based Income Exclusion (Article 5.3.1)			<input type="checkbox"/>
d. Negative Tax Expense Carry-forward (Article 4.1.5)			<input type="checkbox"/>

2. Five-year Elections

	3. Election Year	4. Revocation Year
e. Equity Investment Inclusion Election (Article 3.2.1(c))		
f. Stock-based compensation election (Article 3.2.2)		
g. Realisation principle election (Article 3.2.5)		
h. Intra-group transactions election (Article 3.2.8)		
i. Election not to allocate cross-border deferred tax		

5. Other elections

j. GloBE Loss Election (Article 4.5)	6. Election Year	7. Revocation Year
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(b) Information requirements related to jurisdictional elections

1. Inclusion of equity gain or loss with respect to an Equity Investment Inclusion Election	
2. Balance of the owner's investment in a Qualified Ownership Interest from prior years	[A]
3. Additions to the owner's investment in a Qualified Ownership Interest	[B]
4. Reductions to the owner's investment in a Qualified Ownership Interest	[C]
5. Outstanding balance of the owner's investment in a Qualified Ownership Interest	[D]=[A]+[B]-[C]

3.2.3.2 Election for Article 7.3.1

1. Deemed Distribution Tax election (Article 7.3.1)

(a) Recapture mechanism for Article 7.3

1. Fiscal Year	2. Deemed Distribution Tax determined under Article 7.3.2	3. Deemed Distribution Tax paid or used				Reporting Fiscal Year	4. Outstanding balance of a Deemed Distribution Tax Recapture Account
		3 rd preceding Fiscal Year	2 nd preceding Fiscal Year	1 st preceding Fiscal Year	1 st preceding Fiscal Year		
4 th preceding Fiscal Year							
3 rd preceding Fiscal Year		Not applicable					
2 nd preceding Fiscal Year		Not applicable	Not applicable				
1 st preceding Fiscal Year		Not applicable	Not applicable	Not applicable			
Reporting Fiscal Year		Not applicable	Not applicable	Not applicable	Not applicable		Not applicable

(b) Application of Article 7.3.7

1. Reduction to the Adjusted Covered Taxes for a prior Fiscal Year	2. Incremental Top-up tax	3. Disposition Recapture Ratio
[A]	[B]	[C]

3.2.4. Constituent Entity Computations

(a) Election for the transitional simplified jurisdictional reporting framework

1. Does the MNE Group elect to apply the transitional simplified jurisdictional reporting framework? Yes/No

(b) Aggregated Reporting for Tax Consolidated Groups

1. Tax Consolidated Group (TIN)	2. Consolidated Entities (TIN)

3.2.4.1 GloBE Income or Loss**(a) Adjustments to the Financial Accounts Net Income or Loss**

	Additions	Reductions
1. CE or member of JV Group (TIN)		
2. FANIL amount after allocations in Articles 3.4 and 3.5		
3. Adjustments		
(a) Net Taxes Expense - Article 3.2.1 (a)		
(b) Excluded Dividends – Article 3.2.1 (b)		
(c) Excluded Equity Gain or Loss – Article 3.2.1 (c)		
(d) Included Revaluation Method Gain or Loss – Article 3.2.1 (d)		
(e) Gain or loss from disposition of assets and liabilities excluded under Article 6.3 – Article 3.2.1 (e)		
(f) Asymmetric Foreign Currency Gains or Losses – Article 3.2.1 (f)		
(g) Policy Disallowed Expenses – Article 3.2.1 (g)		
(h) Prior Period Errors – Article 3.2.1 (h)		
(i) Changes in Accounting Principles – Article 3.2.1(h)		
(j) Accrued Pension Expense – Article 3.2.1 (i)		
(k) Debt releases - Article 3.2.1		
(l) Stock-based compensation – Article 3.2.2		
(m) Arm's length adjustments – Article 3.2.3		
(n) Qualified Refundable Tax Credit or Marketable Transferable Tax Credits – Article 3.2.4		
(o) Election for Gains and losses using realisation principle – Article 3.2.5		

(p)	Election for Adjusted Asset Gain – Article 3.2.6	
(q)	Intragroup Financing Arrangement expense – Article 3.2.7	
(r)	Election for intragroup transactions in same jurisdiction – Article 3.2.8	
(s)	Insurance company taxes charged to policyholders – Article 3.2.9	
(t)	Increase/decrease to equity attributed to Additional Tier One and Restricted Tier One Capital distributions paid/payable or received/receivable – Article 3.2.10	
(u)	Constituent Entities joining and leaving an MNE Group – Article 3.2.11 and 6.2	
(v)	Reduction of GloBE Income of the UPE that is a Flow-through Entity – Article 3.2.11 and 7.1	
(w)	Reduction of GloBE Income of the UPE that is subject to a Deductible Dividend Regime – Article 3.2.11 and 7.2	
(x)	Taxable Distribution Method election – Article 3.2.11 and 7.6	
(y)	International Shipping Income – Article 3.3	
(z)	Transactions between Constituent Entities – Article 9.1.3	
4. GloBE Income (Loss) of the CE or member of JV Group		

(b) Cross-border allocation of income or loss between a Main Entity and a PE and from an FTE (Articles 3.4 and 3.5)

1. CE or members of JV Groups located in this jurisdiction or stateless CE (TIN)	2. FANIL before the adjustment	3. Basis for the adjustment	4. Other CE or member of JV Group (TIN)	5. Jurisdiction of other CE or member of JV Group (ISO)	6. Additions to this CE	7. Reductions to this CE	8. FANIL after the adjustment

(c) Cross-border adjustments

1. CE or member of JV Group (TIN)	2. Basis for the adjustment	3. Other CE or member of JV Group (TIN)	4. Jurisdiction of other CE (ISO)	5. Additions to this CE	6. Reductions to this CE

(d) Adjustments to the GloBE Income of the UPE under Article 7.1 or Article 7.2

1. CE (or member of JV Group) located in this jurisdiction (TIN)	2. Basis for reduction	3. Identification of holders of Ownership Interests or dividend recipients (see note)	4. Ownership interest directly held (in percentage)	5. Reductions for this CE

3.2.4.2 Adjusted Covered taxes**(a) Adjustments to the Current tax expense in the Financial Accounts**

1. CE or member of JV Group (TIN)	2. Current tax expense with respect to Covered Taxes after allocations in Article 4.3	3. Adjustments	Additions	Reductions
(a)	Covered Tax accrued as an expense in the profit before taxation in the financial accounts - Article 4.1.2 (a)			
(b)	Covered Taxes for uncertain tax position recorded as a reduction to Covered Taxes in prior year – Article 4.1.2 (c)			
(c)	Qualified Refundable Tax Credit or Marketable Transferable Tax Credits recorded as a reduction to current tax expense – Article 4.1.2 (d)			
(d)	Qualified Flow-through Tax Benefits of Qualified Ownership Interests – Article 3.2.1 (c)			
(e)	Current tax expense on income excluded from GloBE Income or Loss – Article 4.1.3 (a)			
(f)	Non-Qualified Refundable Tax Credit Non-Marketable Transferable Tax Credits or Other Tax Credits not recorded as a reduction to current tax expense – Article 4.1.3 (b)			
(g)	Covered Taxes refunded or credited (except for any Qualified Refundable Tax Credit, or Marketable Transferable Tax Credits) not treated as an adjustment to current tax expense – Article 4.1.3 (c)			
(h)	Current tax expense related to uncertain tax position – Article 4.1.3 (d)			
(i)	Current tax expense not expected to be paid within three years – Article 4.1.3 (e)			
(j)	Post-filing adjustments – Article 4.6.1			
(k)	Covered Taxes relating to Net Asset Gain or Net Asset Loss – Article 3.2.6			
(l)	Reduction of Covered Taxes of the UPE that is a Flow-through Entity – Article 7.1			
(m)	Covered Taxes for GloBE Income of the UPE that is reduced under a Deductible Dividend Regime – Article 7.2.2			

(n)	Deemed Distribution Tax – Article 7.3		
(o)	Taxable Distribution Method election – Article 7.6.2(b)		
(p)	Total Deferred Tax Adjustment Amount – Article 4.1.1(b)		
(q)	Increase or decrease in Covered Taxes recorded in equity or Other Comprehensive Income relating to amounts included in GloBE Income or Loss that will be subject to tax under local tax rules – Article 4.1.1 (c)		
4.	Adjusted Covered Taxes		

(b) Cross allocation of taxes

1. CE located in this jurisdiction or stateless CE (or member of JV Group) (TIN)	2. Covered Taxes of the CE (or member of JV Group) before the adjustment	3. Basis for the adjustment	4. Other CE (or member of JV Group) (TIN)	5. Jurisdiction of other CE (or member of JV Group) (ISO)	6. Additions to this CE	7. Reductions to this CE	8. Covered Taxes of the CE (or member of JV Group) after the adjustment

(c) Deferred tax expense

1. CE or member of JV Group (TIN)	2. Deferred tax expense amount for GloBE purposes	3. Adjustments to deferred tax expense	Additions	Reductions
(a)	Deferred tax expense related to items excluded from GloBE Income or Loss – Article 4.4.1 (a)			
(b)	Deferred tax expense related to Disallowed Accruals– Article 4.4.1 (b)			
(c)	Deferred tax expense related to Unclaimed Accruals – Article 4.4.1 (b)			
(d)	Valuation adjustment or accounting recognition adjustment related to a deferred tax asset – Article 4.4.1 (c)			
(e)	Deferred tax expense arising from a re-measurement related to changes in the tax rate – Article 4.4.1 (d)			
(f)	Deferred tax expense related to the generation and use of tax credits – Article 4.4.1 (e)			
(g)	Substitute Loss Carry Forward DTA or deemed Substitute Loss Carry Forward DTA – Article 4.4.1 (e)			
(h)	Disallowed Accruals or Unclaimed Accruals paid during the fiscal year – Article 4.4.2 (a)			

(i)	Recapture Deferred Tax Liability paid during the fiscal year – Article 4.4.2 (b)	
(j)	Recognition of a loss Deferred Tax Asset not included in the financials – Article 4.4.2 (c)	
(k)	Deferred tax expense adjustment resulting from a reduction to a tax rate – Article 4.6.2	
(l)	Deferred tax expense adjustment resulting from an increase to a tax rate – Article 4.6.3	
(m)	Constituent Entities joining and leaving an MNE Group – Article 6.2	
(n)	Deferred tax expense of the UPE that is a Flow-through Entity – Article 7.1	
(o)	Deferred tax expense of the UPE that is subject to Deductible Dividend Regime – Article 7.2	
(p)	Deferred tax adjustment resulting from transactions between Constituent Entities – Article 9.1.3	
4.	Difference between deferred tax expense recorded at a lower tax rate than the Minimum Rate and recast at Minimum Rate	
5.	Difference between the deferred tax expense recorded at a higher tax rate than the Minimum Rate and recast at Minimum Rate	
6.	Total Deferred Tax Adjustment Amount	

3.2.4.3 Constituent Entity elections (or elections that apply to a JV Group)

1.	Constituent Entities (or member of JV Group) for which an election is made (TIN)	
2.	Annual Elections	
	a. Election to apply the Simplified Calculations for NMCEs (Simplified Calculations Safe Harbour)	
	b. Debt Release election (Article 3.2.1)	
	c. Unclaimed Accrual Election (Article 4.4.7)	4. Election Year
3.	Five-Year Elections	5. Revocation Year
	d. Not treating an Entity as an Excluded Entity election (Article 1.5.3)	
	e. Inclusion of all dividends with respect to Portfolio Shareholdings (Article 3.2.1(b))	
	f. Treating foreign exchange gains or losses attributable to hedging as an Excluded Equity Gain or Loss (Article 3.2.1(c))	
	g. Investment entity tax transparency election (Article 7.5)	
	h. Taxable distribution method election (Article 7.6)	
	i. Unclaimed Accrual Five-Year election (Article 4.4.7)	
6.	Other Elections	
	j. GloBE Loss Election (Article 4.5.6)	
	k. Fair value election (Article 6.3.4)	

1. Constituent Entities (members of JV Groups) for which the election is made (TIN)	2. Fiscal Year of the triggering event	3. Inclusion in the Fiscal Year of the triggering event as provided under Article 6.3.4 (c) (i) or 5-year inclusion (as provided under Article 6.3.4 (c) (ii))
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3.2.4.4 International shipping income exclusion

(a) International shipping income exclusion

1. CE or member of JV Group located in this jurisdiction (TIN)		
International shipping income	2. Category	
	3. Revenue	[A]
	4. Costs	[B]
	5. International Shipping Income	[C]=[A]-[B]
Qualified Ancillary International Shipping Income	6. Category	
	7. Revenue	[D]
	8. Costs	[E]
	9. Qualified Ancillary International Shipping Income	[F]=[D]-[E]
Effect on substance-based income exclusion	10. Payroll costs attributable to the excluded International Shipping Income or Qualified Ancillary International Shipping Income	
	11. Carrying value of tangible assets used in the generation of the excluded International Shipping Income or Qualified Ancillary International Shipping Income	
Covered taxes	12. Covered taxes attributable to the excluded International Shipping Income or Qualified Ancillary International Shipping Income	

(b) Jurisdictional cap for the qualified ancillary international shipping income exclusion

1. Total International Shipping Income for all CEs (or members of JV Group)	[A]
2. 50% cap	50%x[A]
3. Total Qualified Ancillary International Shipping Income for all CEs (or members of JV Group)	[B]

4. Excess of the cap if B exceeds 50% of A	[B]-50%x[A]
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3.2.4.5 Information for purposes of Article 7.6 (if applicable)

Taxable Distribution Method Election				
1. Constituent Entity-owner (or member of JV Group) for which an election is made (TIN)	2. Investment Entity for which the election is made (TIN)	3. Actual and deemed distributions of the Investment Entity's GloBE Income received by the Constituent Entity-owner	4. Local Creditable Tax Gross-up incurred by the Investment Entity	5. Constituent proportionate share of the Investment Entity's Undistributed Net GloBE Income

3.2.4.6 Other Accounting Standard

1. Constituent Entity (or member of JV Group) with FANIL based on a different accounting standard (TIN)	2. Acceptable or Authorised Financial Accounting Standard

3.3. Top-up Tax computation

3.3.1. Top-up Tax

a. Top-up Tax Percentage	b. Substance-based Income Exclusion	c. Excess Profits	d. Additional Current Top-up Tax	e. QDMTT payable	f. Top-up Tax
[A]=15% - ETR	[B]	[C] = Net GloBE Income or Loss - [B]	[D]	[E]	= [A]x[C] + [D] - [E]

3.3.2. Computation of Substance-based Income Exclusion (if applicable)

3.3.2.1 Total amount of the Substance Based Income Exclusion

Payroll carve-out		Tangible Assets carve-out			Total
1. Relevant Eligible Payroll Costs of Eligible Employees performing activities in the jurisdiction	2. Application of relevant mark-up percentage for the Reporting Fiscal Year	3. Carrying value of relevant Tangible Assets located in the jurisdiction	4. Application of relevant mark-up percentage for the Reporting Fiscal Year	5. Substance-based Exclusion	Income
[A]	[B]	[C]	[D]	[E]=[A]x[B]+[C]x[D]	

3.3.2.2 Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets to Permanent Establishments for purposes of the Substance Based Income Exclusion

1. Relevant Eligible Payroll Costs	2. Carrying value of relevant Eligible Tangible Assets	3. Jurisdiction of PEs	4. Relevant Eligible Payroll Costs allocated to PEs	5. Carrying value of relevant Eligible Tangible Assets allocated to PEs

3.3.2.3 Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets of a Flow-through Entity for purposes of the Substance Based Income Exclusion

1. Relevant Eligible Payroll Costs	2. Carrying value of relevant Eligible Tangible Assets	3. Jurisdiction of CE owners (or members of JV Group)	4. Relevant Eligible Payroll Costs allocated to CE owner (or excluded)	5. Carrying value of relevant Eligible Tangible Assets allocated to CE owner (or excluded)

3.3.3. Additional Current Top-up Tax

3.3.3.1 Additional Current Top-up Tax for purposes other than Article 4.1.5

1. Relevant Articles	2. Relevant year	3. As previously reported or recalculated	4. Net GloBE Income/Loss	5. Adjusted Covered Taxes	6. ETR	7. Excess Profit	8. Top-up Percentage	Tax	9. Top-up Tax	10. Additional Current Top-up Tax
	Prior Fiscal Year X	a. Previously Reported								
		b. Recalculated								

3.3.3.2 Additional Current Top-up Tax for purposes of Article 4.1.5

1. Adjusted Covered Taxes for the jurisdiction (if negative)	[A]
2. GloBE Loss for the Jurisdiction	[B]
3. Expected Adjusted Covered Taxes	$[C] = [B] \times 15\%$
4. Additional Current Top-up Tax	$[D] = [C] - [A]$

3.3.4. QDMTT

1. Financial Accounting Standard										
2. QDMTT amount payable										
3. QDMTT Minimum Rate (if higher than 15%)										
4. Basis for the blending of income and taxes (if different from the GloBE Rules)										
5. Currency used (if different from CFS presentation currency)										
6. Five-year election to use the CFS presentation currency or the local currency	<table border="1"> <thead> <tr> <th>a. Currency</th> <th>b. Election Year</th> <th>c. Revocation Year</th> </tr> </thead> <tbody> <tr> <td></td> <td>Yes/No</td> <td></td> </tr> <tr> <td></td> <td>Yes/No</td> <td></td> </tr> </tbody> </table>	a. Currency	b. Election Year	c. Revocation Year		Yes/No			Yes/No	
a. Currency	b. Election Year	c. Revocation Year								
	Yes/No									
	Yes/No									
7. SBIE available?	Yes/No									
8. De-minimis available?	Yes/No									

3.4. Top-up Tax allocation and attribution (if any)

3.4.1. Application of the IIR in respect of this jurisdiction

1. Group Entity allocated Top-up Tax	a. LTCE or member of JV Group (TIN)	
	b. GloBE Income of the LTCE or member of JV Group	[A]
	c. Top-up Tax of the Low-Taxed CE or the member of the JV Group	$[C] = [T] \times [A] / [A+B+etc]$
2. Parent Entities required to apply a QIIR	a. Parent Entity (TIN)	[Parent Entity 1]
	b. Parent Entity Jurisdiction	Jurisdiction B
	c. The amount of GloBE Income attributable to Ownership Interests held by other owners	[D]
	d. Parent Entity's Inclusion Ratio	$[F] = ([A] - [D]) / [A]$
3. IIR Top-up Tax	a. Parent Entity's Allocable Share of the Top-up Tax	$[G] = [C] \times [F]$
	b. IIR Offset	[H]
	c. Top-up Tax payable by Parent Entity	$[I] = [G] - [H]$

3.4.2. Total UTPR Top-up Tax amount in respect of this Jurisdiction

1. LTCE (or member of JV Group) for which Article 2.5.2 does not apply (TIN)	
2. Top-up Tax taken into account for Article 2.5.1	
3. Total UTPR Top-up Tax Amount in respect of this jurisdiction	

3.4.3. Attribution of Top-up Tax under the UTPR

1. UTPR Jurisdictions	2. UTPR Top-up Tax carry-forward	3. Number of Employees	4. Net Book Value of Tangible Assets	5. UTPR Percentage	6. UTPR Top-up Tax Amount attributed for the Reporting Fiscal Year	7. Additional cash tax expense incurred by CEs in UTPR jurisdiction	8. UTPR Top-up tax left to be carried forward
Total							

Annex A2. Explanatory guidance

Explanatory Guidance

Structure of the guidance

This guidance follows the same outline as Annex A1 which identifies the data points. It provides clarifications on the information that is identified in the tables provided in Annex A1. The clarifications may include possible options for such information.

Numbering of the Notes

The numbering of the notes in the guidance also follows the outline of the tables in Annex A1. In particular, each note is numbered after the section in which the table is found, with an additional reference to the column(s) and/or the row(s) to which it refers. For example, Note 3.2.1.2.1 refers to row 1 of the table provided in Section 3.2.1.2 of Annex A1.

GloBE Rules and Definitions

The GloBE Information Return and the Explanatory Notes shall not be construed as a modification or an interpretation of the GloBE Model Rules or the Commentary (as amended by any Administrative Guidance). The terms used in the GloBE Information Return and in the Explanatory Notes are defined in the GloBE Model Rules and in the Commentary.

Sign convention

In almost all cases, the amounts to be reported in the GloBE Information Return are positive amounts, even when they relate to expenses, reductions or other items that are deducted from another amount. In exceptional cases, however, the Filing Constituent Entity may report a negative amount. If that is the case, this number should be reported in brackets.

Filing requirements

The requirement for each CE to file a GIR with each tax administration is removed when the UPE or a Designated Filing Entity files the GIR with the tax administration of the jurisdiction where it is located and there is a Qualifying Competent Authority Agreement in effect to exchange GloBE information with the jurisdiction of the CE by the filing deadline.

Use of the GIR for QDMTT purposes

Jurisdictions that have implemented a QDMTT would use equivalent datapoints to those provided in the GloBE Information Return. More specifically, jurisdictions that have implemented a QDMTT that is eligible for the QDMTT Safe Harbour will follow the approach set out in the GloBE Information Return for information collection and reporting purposes (including the simplified jurisdictional reporting framework, unless the jurisdiction chooses not to apply that framework in line with paragraph 51 of the QDMTT Safe Harbour document). As an exception, however, the Filing Constituent Entity shall not complete Section 3.4 of the GIR unless the QDMTT legislation allocates the QDMTT among Constituent Entities based on their GloBE Income.

Following the approach set out in the GloBE Information Return does not mean that the QDMTT jurisdiction is required to enter into exchange of information agreements and rely on the information that is filed in other jurisdictions. The QDMTT Safe Harbour jurisdiction would be considered using the GIR when it collects the same information in the same format.

Basis for information reported in the GIR

MNE Groups shall complete the data points in the GIR based on the Model Rules and Commentary. However, where a single jurisdiction has taxing rights under the GloBE Rules or where a QDMTT Safe Harbour applies with respect to a jurisdiction or subgroup reported in Section 1.4.2 or Section 3 of the GIR, those sections of the GIR should be completed based on the domestic legislation of the jurisdiction with those taxing rights.

1 MNE Group Information

Functioning of this section - MNE Group Information

The MNE Group Information section contains general information on the MNE Group as a whole. It identifies both the Filing Constituent Entity and the MNE Group, provides general accounting information on the Reporting Fiscal Year and the Consolidated Financial Statements of the UPE, contains information on the corporate structure of the group, as well as a summary table providing high-level visibility on the application of the rules.

The summary table allows all Implementing Jurisdictions (i.e. jurisdictions that have introduced either the IIR, the UTPR or both) to identify the range in which the ETR calculated for each jurisdiction falls (broken down into 2.5% increments for ETRs from 0% up to 30%, and otherwise reported as above 30%); and if the ETR was not computed in respect of a jurisdiction, on which exception the MNE has relied (e.g., safe harbour or de minimis exclusion). This high-level information also includes an indication of those jurisdictions where the MNE has no Excess Profit because the Substance-based Income Exclusion exceeded the Net GloBE Income of the jurisdiction and a disclosure of the magnitude of the amounts of Top-up Tax payable under QDMTT and GloBE Rules in respect of each jurisdiction, shown on a scale that indicates either no Top-up Tax payable or, if payable, amounts below EUR 1 million, below EUR 5 million, below EUR 25 million, below EUR 50 million, below EUR 75 million, below EUR 100 million, below EUR 250 million and at or above EUR 250 million.

The Filing Constituent Entity shall file the MNE Group Information section with the tax administration of each jurisdiction where one or more Constituent Entities of the MNE Group are located. The Filing Constituent Entity shall file the MNE Group Information section (with the exception of the high-level summary of GloBE information in Section 1.4) with the tax administration of a QDMTT-only Jurisdiction:

- (i) where Constituent Entities of the MNE Group are located;
- (ii) where a Joint Venture or a member of a JV Group of the MNE Group is located if the QDMTT is imposed in respect of Joint Ventures located in the jurisdiction; or
- (iii) in situations where the QDMTT is imposed in the jurisdiction in respect of a Stateless Constituent Entity or a Stateless Joint Venture of the MNE Group.

1.1. Identification of Filing Constituent Entity

Note 1.1.1 and 1.1.2: the Filing Constituent Entity is the one that files this GloBE Information Return. If multiple Filing Constituent Entities file the GloBE Information Return, each of them shall file a separate GloBE Information Return.

Note 1.1.2, 1.1.3, 1.1.4 and 1.1.5: these columns shall not be completed if the Filing Constituent Entity is the UPE.

Note 1.1.3: the Filing Constituent Entity shall identify its TIN used for purposes of Covered Taxes in the Filing Jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 1.1.4: the relevant option shall be selected: • Designated Filing Entity • Designated Local Entity • Constituent Entity

Note 1.1.5: the Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction where it is located.

Note 1.1.6: the Filing Constituent Entity shall identify the jurisdictions in which filing obligations of Constituent Entities are intended to be met through exchange of information under Article 8.1.2.

1.2. MNE Group General Information

1.2.1. MNE Group and Reporting Fiscal Year

Note 1.2.1.1: the Filing Constituent Entity shall report the name of the MNE Group that is commonly used in the preparation of the Consolidated Financial Statements.

Note 1.2.1.2: the Filing Constituent Entity shall report the start date of the Reporting Fiscal Year.

Note 1.2.1.3: the Filing Constituent Entity shall report the end date of the Reporting Fiscal Year.

Note 1.2.1.4: the Filing Constituent Entity shall report “Yes” if the GloBE Information Return being filed is an amended return.

1.2.2. MNE General accounting information

Note 1.2.2.1: the Filing Constituent Entity shall report the relevant subparagraph (a), (b), (c), (d) of the definition of Consolidated Financial Statements in Article 10 that applies to the Consolidated Financial Statements of the UPE. When letter (d) applies, the Filing Constituent Entity shall use reasonable diligence and good faith efforts for purposes of the identification of the UPE.

Note 1.2.2.2: the Filing Constituent Entity shall report the Financial Accounting Standard that is used for the Consolidated Financial Statements of the UPE. If the UPE does not prepare Consolidated Financial Statements, the Filing Constituent Entity shall report the Authorised Financial Accounting Standard that is used for purposes of the GloBE Rules.

Note 1.2.2.3: the Filing Constituent Entity shall report the ISO code of the currency that is used for the Consolidated Financial Statements of the UPE. If the UPE does not prepare Consolidated Financial Statements, the Filing Constituent Entity shall report the ISO code of the currency that is used for purposes of the GloBE Rules.

1.3. Corporate Structure

Functioning of this section – Corporate structure

The corporate structure information is relevant for purposes of applying the GloBE Rules and identifying which Constituent Entities could be subject to the GloBE Rules and required to pay Top-up Tax (if any) under the GloBE Rules. This section provides information on the UPE in table 1.3.1 as well as information on the corporate structure of the Constituent Entities and members of JV Groups (table 1.3.2.1). Table 1.3.2.2 requires the identification of all Excluded Entities and the reason why they are excluded. Table 1.3.3 requires the reporting of all changes to the corporate structure of Constituent Entities (or other Entities of the MNE Group) and members of JV Groups occurred during the Reporting Fiscal Year.

1.3.1. Ultimate Parent Entity

Note 1.3.1: the information in the table shall be reported as of last day of the Reporting Fiscal Year.

Note 1.3.1: if the MNE Group is a Multi-Parented MNE Group, the Filing Constituent Entity shall complete this table for each UPE.

Note 1.3.1.1: the Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction where the UPE is located for GloBE purposes.

Note 1.3.1.2: the Filing Constituent Entity shall report whether the UPE jurisdiction has a QIIR, QUTPR and/or QDMTT in force for the Reporting Fiscal Year. The relevant option(s) shall be selected: (i) QIIR applicable to Low-Taxed Constituent Entities located in other jurisdictions only; (ii) QIIR applicable to both Low-Taxed Constituent Entities located in other jurisdictions and in the jurisdiction of the Parent Entity; (iii) QUTPR; (iv) QDMTT. If more than one option is relevant, the Filing Constituent Entity shall select all relevant options.

Note 1.3.1.1 and 1.3.1.2: the Filing Constituent Entity shall not report this information if the UPE is an Excluded Entity.

Note 1.3.1.3: the Filing Constituent Entity shall report the name of the UPE.

Note 1.3.1.4: the Filing Constituent Entity shall report the TIN of the UPE used for purposes of Covered Taxes in the jurisdiction where the UPE is located for GloBE purposes or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 1.3.1.5: the Filing Constituent Entity shall report the TIN (if any) issued to the UPE by the jurisdiction where filing takes place (“the Filing Jurisdiction”).

Note. 1.3.1.6: the relevant option(s) shall be selected: Constituent Entity • Flow-Through Entity – Tax Transparent • Flow-Through Entity – Reverse Hybrid • Hybrid Entity • Main Entity • Investment Entity • Insurance Investment Entity • Excluded Entity. If more than one option is relevant, the Filing Constituent Entity shall select all relevant options.

Note 1.3.1.7: if the UPE is an Excluded Entity, the Filing Constituent Entity shall report whether the UPE is: (i) a Governmental Entity; (ii) an International Organisation; (iii) a Non-profit Organisation; (iv) a Pension Fund; (v) an Investment Fund that is the UPE; (vi) a Real Estate Investment Vehicle that is the UPE.

Note 1.3.1.8: the Filing Constituent Entity shall report the jurisdiction that requires the UPE to apply is QIIR under Article 10.3.5 (if any).

1.3.2. Group Entities (other than the UPE) and members of JV Groups

1.3.2.1 Constituent Entities and members of JV Groups

Note 1.3.2.1: the information reported in the table shall be reported as of last day of the Reporting Fiscal Year.

Note 1.3.2.1.1: the Filing Constituent Entity shall report “No” if the information reported in rows 1.3.2.1.2 to 1.3.2.1.16 of the GIR filed for the preceding Reporting Fiscal Year is still valid and complete for the Reporting Fiscal Year. If the answer is No, the Filing Constituent Entity shall not complete rows 1.3.2.1.2 to 1.3.2.1.16. If the answer is Yes, the Filing Constituent Entity shall complete all rows 1.3.2.1.2 to 1.3.2.1.16 with respect to all Constituent Entities and members of JV Groups.

Note 1.3.2.1.2: the Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction where the Constituent Entity (other than the UPE), the JV or the JV Subsidiary is located for GloBE purposes. This row could include the UPE jurisdiction if Constituent Entities other than the UPE, JVs or JV Subsidiaries are located in the UPE jurisdiction. The Filing Constituent Entity shall insert “Stateless” for Stateless Constituent Entities.

Note 1.3.2.1.3: the relevant rules applicable in the jurisdiction shall be selected: (i) QIIR applicable to Low-Taxed Constituent Entities located in other jurisdictions only; (ii) QIIR applicable to both Low-Taxed Constituent Entities located in other jurisdictions and in the jurisdiction of the Parent Entity; (iii) QUTPR; (iv) QDMTT. If more than one option is relevant, the Filing Constituent Entity shall select all relevant options. If the rule applies to all Constituent Entities or members of JV Groups located in the jurisdiction, the Filing Constituent Entity shall complete this row only once (irrespective of the number of Constituent Entities or member of JV Groups in the jurisdiction).

Note 1.3.2.1.4: the Filing Constituent Entity shall report the name of the Constituent Entity, JV or JV Subsidiary.

Note 1.3.2.1.5: the Filing Constituent Entity shall report the TIN of the Constituent Entity, JV or JV Subsidiary used for purposes of Covered Taxes in the jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number. For the identification of Stateless Constituent Entities, the Filing Constituent Entity shall report the TIN or its functional equivalent used for purposes of Covered Taxes in the jurisdiction where the Entity was created.

Note 1.3.2.1.6: the Filing Constituent Entity shall report the TIN of the relevant Constituent Entity, JV or JV Subsidiary issued (if any) by the jurisdiction where the filing of the GloBE Information Return takes place.

Note 1.3.2.1.7: the relevant option(s) shall be selected: • Constituent Entity • Flow-Through Entity – Tax Transparent • Flow-Through Entity – Reverse Hybrid • Hybrid Entity • Permanent Establishment • Main Entity • Minority-Owned Parent Entity • Minority-Owned Subsidiary • Minority-Owned Constituent Entity • Investment Entity • Insurance Investment Entity • Securitisation Entity • Joint Venture (JV) • JV Subsidiary • Non-Material Constituent Entity. If more than one option is relevant, the Filing Constituent Entity shall select all relevant options. The Filing Constituent Entity shall complete table 1.3.2.1 separately with respect to Constituent Entity-owners (if any) for which the status of the Constituent Entity, Joint Venture or JV Subsidiary is different from the status reported in 1.3.2.1.7 (e.g. if a Flow-through Entity is treated as a Tax Transparent Entity by one of its Constituent Entity owners and a Reverse Hybrid Entity by the other, the Filing Constituent Entity shall complete table 1.3.2.1 twice for the same Flow-Through Entity: once with respect to the owner that treats the Flow-through Entity as a Tax Transparent Entity and another time with respect to the owner that treats it as a Reverse Hybrid Entity).

Note 1.3.2.1.8: the Filing Constituent Entity shall report the type of Entity that holds direct Ownership Interests in the Constituent Entity or member of a JV Group or indirect Ownership Interests in the

Constituent Entity or member of a JV Group through Excluded Entities or non-Group members. The relevant option shall be selected (only one applicable): • UPE • Constituent Entities • Joint Ventures • JV Subsidiaries • Excluded Entities (aggregate) • Non-Group members (aggregate). “Excluded Entities (aggregate)” and “Non-Group members (aggregate)” are reported in the aggregate. Non-Group members are Entities that are not Group Entities or members of a JV Group.

Note 1.3.2.1.9: the Filing Constituent Entity shall report the TIN (or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number) of the Constituent Entities, JVs or JV Subsidiaries that hold Ownership Interests in the Constituent Entity, JV or JV Subsidiary. No TIN shall be reported for Excluded Entities that are not the UPE and non-Group members as they are reported in the aggregate (i.e., “Excluded Entities (aggregate)” and “Non-Group members (aggregate)”).

Note 1.3.2.1.10: the Filing Constituent Entity shall report (in percentage) the Ownership Interests directly held in the Constituent Entity, JV or JV Subsidiary by the Constituent Entities, JV, JV subsidiaries, Excluded Entities and non-Group members identified in 1.3.2.1.8. The Filing Constituent Entity shall report Ownership Interests held by non-Group members in the aggregate. When several Excluded Entities hold direct Ownership Interest in a Constituent Entity, JV or JV Subsidiary, the aggregate amount held by all Excluded Entities shall be reported. When a Group Entity, Joint Venture or JV Subsidiary holds indirect Ownership Interest in a Constituent Entity, Joint Venture or JV subsidiary through one or more Excluded Entities or through non-Group members, the Filing Constituent Entity shall report, in addition to any Ownership Interest that this Group Entity, Joint Venture or JV Subsidiary holds directly, the Ownership Interests that it holds indirectly through Excluded Entities or non-Group members. To avoid double counting, in this case, the Ownership Interests directly held in the Constituent Entity, Joint Venture or JV subsidiary by such Excluded Entities or non-Group members taken into account in computing that Group Entity’s Ownership Interest shall not be reported separately. If the Constituent Entity is a Permanent Establishment, the Filing Constituent Entity shall identify the Main Entity in 1.3.2.1.8 and report 100% in 1.3.2.1.10.

Note 1.3.2.1.11 to 1.3.2.1.13: this information shall only be reported in respect of the CE if a QIIR applies in the jurisdiction where the CE is located and if the CE is a POPE or an Intermediate Parent Entity. This information shall not be reported in respect of members of JV Groups or Entities that do not own any Ownership Interest (direct or indirect) in another CE as those Group Entities are not potential Parent Entities.

Note 1.3.2.1.11: the Filing Constituent Entity shall report the type of Parent Entity that applies. The relevant option shall be selected (if any): • POPE • Intermediate Parent Entity • Parent Entity required to apply a QIIR under Art. 10.3.5. Pursuant to the definition of the Partially-Owned Parent Entity, the Parent Entity is a Partially-Owned Parent Entity if it has more than 20% of the Ownership Interests in its profits held (directly or indirectly) by persons that are not Constituent Entities of the MNE Group and if it owns (directly or indirectly) an Ownership Interest in another Constituent Entity of the same MNE Group.

Note 1.3.2.1.12: the Filing Constituent Entity shall report the TIN used for Covered Taxes in the jurisdiction where the other Intermediate Parent Entity is located for GloBE purposes or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 1.3.2.1.13: pursuant to Article 2.1.5, a POPE is not required to apply the IIR if it is wholly owned (directly or indirectly) by another POPE that is required to apply a Qualified IIR for the Reporting Fiscal Year. If the exception in Article 2.1.5 applies, the Filing Constituent Entity shall report the TIN used for Covered Taxes in the jurisdiction where the other Partially-Owned Parent Entity is located for GloBE purposes or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 1.3.2.1.14 to 1.3.2.1.16: the Filing Constituent Entity shall not complete these rows in cases where no jurisdiction has taxing rights under the UTPR with respect to the jurisdiction where the Constituent Entity is located or where the UTPR Safe Harbour applies with respect to that jurisdiction.

Note 1.3.2.1.14: if the answer is “Yes”, the Filing Constituent Entity shall not complete rows 1.3.2.1.15 and 1.3.2.1.16.

Note 1.3.2.1.15: the Filing Constituent Entity shall report the aggregate Ownership Interests in percentage over the total of Ownership Interests held in that Constituent Entity. The aggregate (direct and indirect) Ownership Interests of Parent Entities required to apply a QIIR is the sum of the Ownership Interests held by each Parent Entity that is required to apply a QIIR with respect to the Low-Taxed Constituent Entities. The aggregate amount shall be zero if no Parent Entity is required to apply a QIIR in respect of the low-taxed income of the Low-Taxed Constituent Entity. If a Parent Entity (that owns an Ownership Interest in a Low-Taxed Constituent Entity indirectly through an Intermediate Parent Entity or a Partially-Owned Parent Entity that is not eligible for an exclusion from the IIR under Article 2.1.3 or 2.1.5) is required to apply the IIR, the relevant Ownership Interests shall be counted only once for purposes of computing the aggregate amount.

Note 1.3.2.1.15: the Filing Constituent Entity shall report the aggregate Allocable Share of Top-up Taxes of the member of the JV Group in percentage over the total amount of Top-up Tax for that member of a JV Group. The aggregate Allocable Share of Top-up Taxes of Parent Entities required to apply a QIIR is the sum of the Allocable Share of Top-up Taxes of each Parent Entity that is required to apply a QIIR with respect to the Low-Taxed Joint Venture or JV Subsidiary. The aggregate amount shall be zero if no Parent Entity is required to apply a QIIR in respect of the low-taxed income of the Joint Venture or JV Subsidiary. If a Parent Entity holds an Ownership Interest in a Low-Taxed Joint Venture or JV subsidiary indirectly through another other Parent Entity that is required to apply the IIR, the Allocable Share of Top-up Taxes shall be counted only once for purposes of computing the aggregate amount.

Note 1.3.2.1.16: the Filing Constituent Entity shall report whether the UPE’s Ownership Interests in the CE are held directly or indirectly by Parent Entities required to apply a QIIR in that CE (or whether the aggregate Allocable Shares of Top-up Taxes of Parent Entities required to apply a QIIR for the member of JV Group reduces to zero the JV Group Top-up Tax).

Note 1.3.2.1.15 and 1.3.2.1.16: the Filing Constituent Entity shall not complete these rows in cases where the UPE is required to apply a QIIR with respect to the relevant Constituent Entities (which could include Constituent Entities located in the UPE jurisdiction). In all other cases, the Filing Constituent Entity shall only complete these rows when a Parent Entity required to apply a QIIR with respect to a Constituent Entity holds an Ownership Interest lower than 100% in that Constituent Entity.

1.3.2.2 Excluded Entities

Note 1.3.2.2: the information reported in the table shall be reported for each Excluded Entity as of last day of the Reporting Fiscal Year. An Excluded Entity is a Group Entity that is defined in Article 1.5.1 or Article 1.5.2.

Note 1.3.2.2.1: the Filing Constituent Entity shall report “No” if the information reported in 1.3.2.1.3, 1.3.2.2.2 and 1.3.2.2.3 of the GIR filed for the preceding Reporting Fiscal Year is still valid and complete for the Reporting Fiscal Year. If the answer is No, The Filing Constituent Entity shall not complete 1.3.2.2.2 and 1.3.2.2.3. If the answer is Yes, The Filing Constituent Entity shall complete 1.3.2.2.2 and 1.3.2.2.3 with respect to all Excluded Entities.

Note 1.3.2.2.2: the Filing Constituent Entity shall identify the name of each Excluded Entity.

Note 1.3.2.2.3: the Filing Constituent Entity shall report the type of each Excluded Entity. The relevant option shall be selected (only one applicable): • Governmental Entity • International Organisation • Non-profit Organisation • Pension Fund • Investment Fund that is an UPE • Real Estate Investment Vehicle that is an UPE • Entity owned by Excluded Entities under Article 1.5.2 (a) • Entity owned by Excluded Entities

under Article 1.5.2 (b).

1.3.3. Changes in the corporate structure that occurred during the Reporting Fiscal Year

Note 1.3.3.a: the Filing Constituent Entity shall report “Yes” if any changes occurred during the Reporting Fiscal Year were not reported in table 1.3.3 because they did not affect the ETR computation, the Top-up Tax computation or the allocation of Top-up Tax at any time during the Reporting Fiscal Year (e.g. where a Constituent Entity that was not involved in any cross-border allocation of income or taxes was directly and wholly-owned by the UPE prior to the change and it is transferred to another Constituent Entity that is directly and wholly-owned by the UPE).

Note 1.3.3: the Filing Constituent Entity shall not complete the table if no Constituent Entity (or other Entity of the MNE Group) or member of a JV Group was subject to changes during the Reporting Fiscal Year. The Filing Constituent Entity shall complete these table only with respect to changes that at any time during the Reporting Fiscal Year affected the ETR computation (e.g., for Constituent Entities involved in the cross-border allocation of income or taxes) or the computation or allocation of Top-up Tax (e.g., the extent to which the IIR applies to a Constituent Entity).

Note 1.3.3.1: the Filing Constituent Entity shall report all Constituent Entities (or other Entity of the MNE Group, e.g., Excluded Entities) or members of JV Groups that were subject to changes in their ownership structure or in their status during the Reporting Fiscal Year.

Note 1.3.3.2: the Filing Constituent Entity shall report the TIN used for purposes of Covered Taxes in the jurisdiction where the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group is located for GloBE purposes or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 1.3.3.3: the Filing Constituent Entity shall report the effective date (using dd-mm-yyyy format) of any changes in the ownership structure or any changes in the status of the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group. If a Constituent Entity (or other Entity of the MNE Group) or a member of a JV Group was subject to more than one change during the Reporting Fiscal Year, the Filing Constituent Entity shall complete a separate row for each of such changes.

Note 1.3.3.4: the Filing Constituent Entity shall report the relevant status for GloBE purposes of the Constituent Entity (or other Entity of the MNE Group) or member of JV Group on the day immediately preceding the date of the change. The relevant option(s) shall be selected: Constituent Entity • Flow-Through Entity - Tax Transparent • Flow-Through Entity - Reverse Hybrid • Hybrid Entity • Permanent Establishment • Main Entity • Minority-Owned Parent Entity • Minority-Owned Subsidiary • Minority-Owned Constituent Entity • Investment Entity • Insurance Investment Entity • Securitisation Entity • Joint Venture (JV) • JV Subsidiary • Non-Material Constituent Entity • POPE • Intermediate Parent Entity • Ultimate Parent Entity • Parent Entity required to apply a QIIR under Art. 10.3.5 • Excluded Entity • Non-Group member. If more than one option is relevant, the Filing Constituent Entity shall select all relevant options.

Note 1.3.3.5: the Filing Constituent Entity shall report the relevant status for GloBE purposes of the Constituent Entity (or other Entity of the MNE Group) or member of JV Group on the day of the change after the transaction. The relevant option(s) shall be selected: Constituent Entity • Flow-Through Entity - Tax Transparent • Flow-Through Entity - Reverse Hybrid • Hybrid Entity • Permanent Establishment • Main Entity • Minority-Owned Parent Entity • Minority-Owned Subsidiary • Minority-Owned Constituent Entity • Investment Entity • Insurance Investment Entity • Securitisation Entity • Joint Venture (JV) • JV Subsidiary • Non-Material Constituent Entity • POPE • Intermediate Parent Entity • Ultimate Parent Entity • Parent Entity required to apply a QIIR under Art. 10.3.5 • Excluded Entity • Non-Group member. If more than one option is relevant, the Filing Constituent Entity shall select all relevant options.

Note 1.3.3.5 to 1.3.3.8: if a Constituent Entity (or other Entity of the MNE Group) or member of a JV Group is wound up during the Reporting Fiscal Year, the Filing Constituent Entity shall report the relevant status

for GloBE purposes on the day of the change before the transaction in 1.3.3.4 and “Non-group Member” in 1.3.3.5. The Filing Constituent Entity shall then identify the Entities holding Ownership Interests in the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group on the day of the change before the transaction in 1.3.3.6 and report the Ownership Interests held in the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group by any of such Entities in 1.3.3.7. The Filing Constituent Entity, however, shall not complete 1.3.3.8.

Note 1.3.3.6 to 1.3.3.8: the Filing Constituent Entity shall not complete the 1.3.3.6 and 1.3.3.7 columns with respect to Excluded Entities that were Excluded Entities before the change. The Filing Constituent Entity shall not complete the 1.3.3.6 and 1.3.3.8 columns with respect to Excluded Entities that were Excluded Entities after the change.

Note 1.3.3.6: if the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group is a Permanent Establishment, the Filing Constituent Entity shall identify its Main Entity in the 1.3.3.6 column and report 100% in the 1.3.3.7 or 1.3.3.8 column.

Note 1.3.3.6: the Filing Constituent Entity shall report all Constituent Entities, Group Entities, Excluded Entities, members of JV Groups or non-Group members that directly held Ownership Interests in the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group on the day immediately preceding the date of the transaction or on the day of the change after the transaction. Excluded Entities that are not the UPE and non-Group members should be reported in the aggregate (i.e., “Excluded Entities (aggregate)” and “Non-Group members (aggregate)”). The Filing Constituent Entity shall also report any Group Entity that indirectly held Ownership Interests in the Constituent (or other Entity of the MNE Group) through Excluded Entities or non-Group members on the day immediately preceding the date of the transaction or on the day of the change after the transaction.

Note 1.3.3.7: the Filing Constituent Entity shall report (in percentage) the Ownership Interests held in the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group by the Constituent Entities, Excluded Entities, members of JV Groups and non-Group members identified in 1.3.3.6 on the day immediately preceding the date of change in accordance with the guidance provided in Note 1.3.2.1.10.

Note 1.3.3.8: the Filing Constituent Entity shall report (in percentage) the Ownership Interests held in the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group by the Constituent Entities, Excluded Entities, members of JV Groups and non-Group members identified in 1.3.3.6 on the day of the change after the transaction in accordance with the guidance provided in Note 1.3.2.1.10.

1.4. High-level summary of GloBE Information

Note 1.4: the Filing Constituent Entity shall not complete columns 1.4.2 to 1.4.9 in cases where no jurisdiction has taxing rights (i.e., column 1.4.4 would be empty) with respect to the jurisdiction identified in 1.4.1.

Note 1.4.1: the Filing Constituent Entity shall report the information reflected in the summary table in respect of each jurisdiction where the MNE Group has Constituent Entities or where members of JV Groups are located and each subgroup for which a separate ETR or Top-up Tax computation applies.

Note 1.4.1: the Filing Constituent Entity shall report the 2-character alphabetic country code for the jurisdiction where the MNE Group has Constituent Entities or where members of JV Groups are located based on the ISO 3166-1 Alpha 2 standard.

Note 1.4.2: if applicable, the Filing Constituent Entity shall identify each subgroup, as reported in 2.1.2 and/or 3.1.2.

Note 1.4.3: the Filing Constituent Entity shall report the TIN of the Entity at the top of the ownership structure of each subgroup identified in 1.4.2.

Note 1.4.4: the Filing Constituent Entity shall report the names of the jurisdiction(s) with taxing rights in respect of the jurisdiction identified in 1.4.1 and, if applicable, the relevant subgroup identified in 1.4.3 in the form of 2-character alphabetic country codes based on the ISO 3166-1 Alpha 2 standard. A jurisdiction with taxing rights may include a jurisdiction requiring a Parent Entity to apply a QIIR under Art. 10.3.5, even if that Parent Entity is located in another jurisdiction for GloBE purposes. A jurisdiction has taxing rights in respect of another, where, under the rule order provided in the GloBE rules, the Jurisdictional Top-up Tax computed in respect of the latter jurisdiction would result in a Top-up Tax liability due by a Constituent Entity located in the former jurisdiction under the charging provisions in the former jurisdiction. Specifically, a QDMTT Safe Harbour jurisdiction or a jurisdiction with an Income Inclusion Rule that applies to domestic entities will have taxing rights in respect of itself. Further, several jurisdictions may have taxing rights in respect of the same other jurisdiction. This may be the case, for instance, when both the UPE and a Partially-Owned Parent Entity are required to apply the IIR in respect of a Constituent Entity located in a third jurisdiction. In that case, both the UPE jurisdiction and the Partially-Owned Parent Entity jurisdiction need to be reported under 1.4.4. Equally, UTPR jurisdictions would all have taxing rights in respect of the jurisdictions for which the Top-up Tax is not reduced to zero under Article 2.5.

Note 1.4.5: the Filing Constituent Entity shall report whether the Top-up Tax has been reduced to zero in respect of the jurisdiction identified in 1.4.1 or relevant subgroup identified in 1.4.3 (if any) because of the application of either a Safe Harbour or the de minimis exclusion as reported in 2.2.1 and 2.2.2 respectively. The Filing Constituent Entity shall report the relevant option applied for purposes of the Safe Harbour in accordance with Note 2.2.1.1.1.

Note 1.4.6: the Filing Constituent Entity shall report the range in which the ETR of the jurisdiction identified in 1.4.1 or relevant subgroup identified in 1.4.3 (if any) and as reported in 3.2.1.e falls. The options are: (a) below 2.5%; (b) 2.5% or above but below 5%; (c) 5% or above but below 7.5%; (d) 7.5% or above but below 10%; (e) 10% or above but below 12.5%; (f) 12.5% or above but below 15%; (g) 15% or above but below 17.5%; (h) 17.5% or above but below 20%; (i) 20% or above but below 22.5%; (j) 22.5% or above but below 25%; (k) 25% or above but below 27.5%; (l) 27.5% or above but below 30%; (m) 30% or above. The Filing Constituent Entity shall not complete this column if the MNE Group (or the relevant subgroup) has a GloBE Loss in the jurisdiction. Furthermore, the Filing Constituent Entity shall not complete this column for those jurisdictions (or subgroups) in respect of which Section 3 of the GIR does not need to be completed.

Note 1.4.7: the Filing Constituent Entity shall report whether the application of the Substance-based Income Exclusion in respect of the jurisdiction identified in 1.4.1 or relevant subgroup identified in 1.4.3, if any, has resulted in no Top-Up Tax arising in the jurisdiction. Where there is no SBIE calculated for the jurisdiction or the subgroup the Filing Constituent Entity shall indicate “n/a”.

Note 1.4.8: the Filing Constituent Entity shall report the range in which the QDMTT Top-up Tax payable falls, in respect of the jurisdiction identified in 1.4.1 or relevant subgroup identified in 1.4.3 (if any), as reported in 3.3.1.e, if any. The options are: (a) no Top-up Tax payable; (b) below EUR 1 million; (c) EUR 1 million to below EUR 5 million; (d) EUR 5 million to below EUR 25 million; (e) EUR 25 million to below EUR 50 million; (f) EUR 50 million to below EUR 75 million; (g) EUR 75 million to below EUR 100 million; (h) EUR 100 million to below EUR 250 million; (i) EUR 250 million or above.

Note 1.4.9: the Filing Constituent Entity shall report the range in which the GloBE Top-up Tax payable, if any, falls, in respect of the jurisdiction identified in 1.4.1 or relevant subgroup identified in 1.4.3 (if any) and as reported in 3.3.1.f. The options are: (a) no Top-up Tax payable; (b) below EUR 1 million; (c) EUR 1 million to below EUR 5 million; (d) EUR 5 million to below EUR 25 million; (e) EUR 25 million to below EUR 50 million; (f) EUR 50 million to below EUR 75 million; (g) EUR 75 million to below EUR 100 million; (h) EUR 100 million to below EUR 250 million; (i) EUR 250 million or above. If a different amount to the amount reported in 3.3.1.f is reported in 3.1.10, the Filing Constituent Entity shall report both the range in which the GloBE Top-up Tax payable falls as reported in 3.3.1.f and the range in which the average amount of

Top-up Tax payable under the domestic legislation of each jurisdiction with taxing rights, if any, falls, in respect of the jurisdiction identified in 1.4.1 or the relevant subgroup identified in 1.4.3 (if any) and as reported in 3.1.10 with the same options. For purpose of the average, the amounts reported in 3.1.10 are weighted by the relevant jurisdiction's Allocable Share of the Top-up Tax (after deducting any reduction for the offset mechanism in Article 2.3.2) or UTPR percentage as computed under the GloBE Model Rules and Commentary.

2 Jurisdictional Safe Harbours and Exclusions

Functioning of this section – Jurisdictional safe harbours and exclusions

The Filing Constituent Entity shall complete Section 2 on a jurisdictional basis, for each jurisdiction where exceptions to the GloBE computation apply. In this light, this section provides information to report the application of such exceptions.

Section 2.1 contains basic information for the jurisdiction. Some exceptions apply on a subgroup basis. Section 2.1 therefore requires the identification of such subgroups.

Section 2.2 includes the information relevant for the exceptions to the Top-up Tax computation, i.e. cases where the Top-up Tax is reduced to zero because of the application of either a safe harbour or the de-minimis exclusion.

Section 2.3 provides information demonstrating that the MNE Group is eligible for exclusion from the UTPR under Article 9.3 or from the QDMTT under paragraph 118.51 of the QDMTT Commentary (initial phase of their international activity).

The Filing Constituent Entity shall file the Jurisdictional Safe Harbours and Exclusions section for a jurisdiction with the tax administration of a jurisdiction, if the second-mentioned jurisdiction is the UPE jurisdiction or has taxing rights in respect of the first-mentioned jurisdiction. In particular, the Filing Constituent Entity shall file the Jurisdictional Safe Harbours and Exclusions section for a jurisdiction where a QDMTT is imposed on Constituent Entities or in respect of Joint Ventures or members of JV Group of the MNE Group with the tax administration of that jurisdiction.

2.1. Characteristics of the jurisdiction

Note 2.1: the Filing Constituent Entity shall report the information in respect of each jurisdiction where the MNE Group has Constituent Entities or where members of JV Groups are located.

Note 2.1.1: the Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction. The Filing Constituent Entity shall report “Stateless” for each Stateless Constituent Entity.

Note 2.1.2: Several subgroups can be identified in this row. The relevant option(s) shall be selected from the following list: Constituent Entities • Minority-Owned Subgroup (specify which Minority-Owned Subgroup) • Standalone MOCEs • Investment Entities • Joint Venture Group (specify which JV Group) • Stateless Constituent Entity • Transitional CbCR Safe Harbour-Constituent Entities • Transitional CbCR Safe Harbour- Joint Venture Group (specify which JV Group) • Transitional UTPR Safe Harbour. Standalone MOCEs are Minority-Owned Constituent Entities that are not part of any Minority-Owned Group. Investment Entities also include JVs or JV subsidiaries that qualify as Investment Entities but do

not include Investment Entities for which an election is made under Article 7.5. Minority-Owned Subgroups may be made of members of JV Groups. Stateless Constituent Entities also include members of JV Groups that are Stateless. The Filing Constituent Entity shall report the relevant information for each subgroup.

Note 2.1.3: the Filing Constituent Entity shall report the TIN of the Entity at the top of the ownership structure of each subgroup identified in row 2.1.3.

Note 2.1.4: the Filing Constituent Entity shall report the names of the jurisdiction(s) with taxing rights in respect of the jurisdiction identified in 2.1.1 and, if applicable, the relevant subgroup identified in 2.1.3 in the form of 2-character alphabetic country codes based on the ISO 3166-1 Alpha 2 standard. A jurisdiction has taxing rights in respect of another, where, under the rule order provided in the GloBE Rules, the Jurisdictional Top-up Tax computed in respect of the latter jurisdiction would result in a Top-up Tax liability due by a Constituent Entity located in the former jurisdiction under the charging provisions in the former jurisdiction. Specifically, a QDMTT Safe Harbour jurisdiction or a jurisdiction with an Income Inclusion Rule that applies to domestic Entities will have taxing rights in respect of itself. Further, several jurisdictions may have taxing rights in respect of the same other jurisdiction. This may be the case, for instance, when both the UPE and a Partially-Owned Parent Entity are required to apply the IIR in respect of a Constituent Entity located in a third jurisdiction. In that case, both the UPE jurisdiction and the Partially-Owned Parent Entity jurisdiction need to be reported under 2.1.4. Equally, UTPR jurisdictions would all have taxing rights in respect of the jurisdictions for which the Top-up Tax is not reduced to zero under Article 2.5. When multiple jurisdictions are reported in 2.1.4, the Filing Constituent Entity shall also complete 2.1.5 in respect of each of them.

Note 2.1.5: this row shall be completed separately for each jurisdiction with taxing rights identified in 2.1.4. The Filing Constituent Entity shall report 'Yes' for a jurisdiction when either the MNE Group has reported that it is eligible for a safe harbour or exclusion in Section 2 when it is not eligible for the same safe harbour or exclusion under the domestic law of the relevant jurisdiction with taxing rights or, conversely, the MNE Group has reported that it is not eligible for a safe harbour or exclusion in Section 2 when it is eligible for the same safe harbour or exclusion under the domestic law of the relevant jurisdiction with taxing rights. Where the Filing Constituent Entity reports 'Yes', it should both: (i) complete Section 2 with respect to the relevant safe harbour or exclusion; and (ii) report in Section 3 the jurisdictional computations for that jurisdiction or subgroup.

2.2. Jurisdictional exceptions applicable in respect of this jurisdiction (Top-up Tax reduced to zero)

Functioning of this Section – Jurisdictional exceptions applicable in respect of this jurisdiction

This section includes the information relevant for the exceptions to the Top-up Tax computation, i.e. cases where the Top-up Tax is reduced to zero because of the application of either a Safe Harbour or the de-minimis exclusion. Section 2.2.1 requires the Filing Constituent Entity that elected to apply transitional safe harbour to report the information needed to demonstrate that the MNE Group is eligible for that safe harbour for the jurisdiction. It also requires the disclosure of data points needed for purposes of the Simplified Calculations under permanent safe harbours. This section could be expanded over time to reflect other safe harbours (e.g. additional Simplified Calculations), where relevant.

Section 2.2.2 requires the Filing Constituent Entity that elected for the application of the de-minimis exclusion to report the information needed to demonstrate that the jurisdiction is eligible for the de-minimis exclusion.

2.2.1. Safe harbour jurisdiction election

Note 2.2.1: where a safe harbour reduces the top-up tax to zero for Constituent Entities or members of JV Groups, the Filing Constituent Entity shall not complete any tables in Section 3 with respect to those Constituent Entities or members of JV Groups (except otherwise indicated in the notes below).

2.2.1.1 Safe harbour election

Note 2.2.1.1.1: the Filing Constituent Entity shall identify the test that it elects to apply for this jurisdiction. An MNE Group that qualifies for more than one test may choose which test to apply for that jurisdiction. The Filing Constituent Entity shall select the relevant option: (a) permanent safe harbour – de minimis test; (b) permanent safe harbour – ETR test; (c) permanent safe harbour – routine profits test; (d) QDMTT safe harbour; (e) Transitional CbCR Safe Harbour – De minimis test; (f) Transitional CbCR Safe Harbour – Simplified ETR test; (g) Transitional CbCR Safe Harbour – Routine profits test; or (h) Transitional UTPR safe harbour. The Filing Constituent Entity shall not select option (e), (f) or (g) for a jurisdiction for a Reporting Fiscal Year if it did not elect to apply a safe harbour or selected an option other than (e), (f) or (g) for the preceding Reporting Fiscal Year. Option (h) can only be selected if the jurisdiction is the UPE jurisdiction, in accordance with the agreed safe harbour.

Note 2.2.1.1.1: if option (a), (b) or (c) is selected, and Simplified Calculations only apply to a portion of the GloBE calculations, the Filing Constituent Entity shall also complete relevant portions of Section 3 that are not covered by the Simplified Calculations.

Note 2.2.1.1.1: if option (a), (b) or (c) is selected, and only a portion of Constituent Entities or members of JV Groups in the subgroup identified in 2.1.3 are covered by the Simplified Calculations, the Filing Constituent Entity shall also complete Section 3 for all Constituent Entities or members of JV Groups located in the safe harbour jurisdiction as provided in the explanatory guidance.

Note 2.2.1.1.1: if option (a), (b) or (c) is selected, and Additional Current Top-up Tax arises in the jurisdiction, the Filing Constituent Entity shall also complete columns 1.4.8 to 1.4.9, columns 3.3.1.d to 3.3.1.f, Section 3.3.3 and Section 3.4 with respect to the relevant Constituent Entities or members of JV Groups located in the jurisdiction.

Note 2.2.1.1.1: option (d) shall not be selected when the switch-off rule applies to the QDMTT Safe Harbour in respect of the jurisdiction or the relevant subgroup. If option (d) is selected, the Filing Constituent Entity may also select one of the other options. If no other option is selected, the Filing Constituent Entity shall also complete Section 3 for all Constituent Entities or members of JV Groups

located in the safe harbour jurisdiction with the calculations undertaken for QDMTT purposes (or for the Stateless Constituent Entities if the QDMTT is imposed on the Stateless Constituent Entities in the safe harbour jurisdiction). If the MNE Group elects to apply the QDMTT safe harbour together with another safe harbour (or the de-minimis exclusion, respectively) available under the QDMTT legislation, the Filing Constituent Entity shall complete the relevant portions of Section 3 (or Table 2.2.2, respectively) with the calculations undertaken for QDMTT purposes. As an exception, however, the Filing Constituent Entity shall not complete Section 3.4 unless the QDMTT legislation allocates the QDMTT among Constituent Entities (or members of JV Groups) based on their GloBE Income. If the QDMTT legislation allocates the QDMTT among Constituent Entities (or members of JV Groups) based on their GloBE Income, the Filing Constituent Entity shall complete rows 3.4.1.1.a to 3.4.1.1.c.

Note 2.2.1.1.1: if option (c) or (g) is selected, the Filing Constituent Entity shall also complete Section 3.3.2 (relating to the Substance-based Income Exclusion) with respect to the relevant Constituent Entities or members of JV Groups in accordance with agreed safe harbours. Nevertheless, the Filing Constituent Entity does not need to complete Section 3.3.2 if option (g) is selected and the MNE Group reported zero profit or a loss for the jurisdiction in 2.2.1.3.a.2.

2.2.1.2 Permanent safe harbours

(a) Simplified Calculation for Non-material Constituent Entities

Note 2.2.1.2(a-d): if Simplified Calculation for Non-material Constituent Entities is utilised under option (a), (b) or (c) in 2.2.1.1.1, the Filing Constituent Entity shall also report the Total Revenue, as defined in the Safe Harbours and Penalty Relief document, of all Non-material Constituent Entities located in the jurisdiction for which the election to apply the Simplified Calculations for Non-Material Constituent Entities is made for the Reporting Fiscal Year, the first preceding fiscal year (if applicable) and the second preceding fiscal year (if applicable), as well as the average of the three Fiscal Years respectively. If Simplified Calculation for Non-material Constituent Entities is utilised under option (a) in 2.2.1.1 and the Simplified Calculations for Non-Material Constituent Entities apply only to some of the Constituent Entities in the subgroup identified in 2.1.3, the Filing Constituent Entity shall also complete table 2.2.2.

Note 2.2.1.1.a.2: if Simplified Calculation for Non-material Constituent Entities is utilised under option (b) in 2.2.1.1.1, the Filing Constituent Entity shall report aggregate Simplified Tax, as defined in the Safe Harbours and Penalty Relief document, of all Non-material Constituent Entities located in the jurisdiction for which the election to apply the Simplified Calculations for Non-Material Constituent Entities is made for the Reporting Fiscal Year.

2.2.1.3 Transitional safe harbours

(a) Transitional CbCR Safe Harbour

Note 2.2.1.3.a: where the Qualified Financial Statements used to complete this table are the separate financial statements of a Constituent Entity or a member of a JV Group and are based on an accounting standard that differs from the accounting standard used in the Consolidated Financial Statements of the Ultimate Parent Entity, the Filing Constituent Entity shall complete Table 3.2.4.6.

Note 2.2.1.3.a.1: If option (e) is selected in 2.2.1.1.1, the Filing Constituent Entity shall report the Total Revenue for the jurisdiction as reported in the Qualified CbC Report of the MNE Group (or Qualified Financial Statements for members of JV Groups) for the Reporting Fiscal Year. Option (e) cannot be selected if the sum of the total revenue of Entities that are held for sale when combined with the CbCR Total Revenue in that jurisdiction (as reported in the MNE's Qualified CbC Report) equals or exceeds EUR 10 million.

Note 2.2.1.3.a.2: If option (e), (f) or (g) is selected in 2.2.1.1.1, the Filing Constituent Entity shall report the Profit (Loss) before Income Tax for the jurisdiction as reported in the Qualified CbC Report of the MNE

Group (or Qualified Financial Statements for members of JV Groups) for the Reporting Fiscal Year and in accordance with the methodologies set out in the Safe Harbours and Penalty Relief document.

Note 2.2.1.3a.3: If option (f) is selected in 2.2.1.1.1, the Filing Constituent Entity shall report the Simplified Covered Taxes of the relevant Constituent Entities or members of JV Groups, as defined in the Safe Harbours and Penalty Relief document, for the Reporting Fiscal Year.

(b) Transitional UTPR Safe Harbour

Note 2.2.1.3.b.1: If option (h) is selected in 2.2.1.1.1, the Filing Constituent Entity shall report the corporate income tax rate of the UPE jurisdiction in accordance with the agreed safe harbour.

2.2.2. Election for de minimis exclusion

Note 2.2.2: Investment Entities and Stateless Constituent Entities are not eligible for the de minimis exclusion. The GloBE Revenue and GloBE Income or Loss of both types of Entities are excluded from the computation in Art. 5.5.3. The GloBE Revenue and the GloBE Income or Loss of the Minority-Owned Constituent Entities is taken into account together with those of other Constituent Entities for purposes of determining the Average GloBE Revenue and the Average GloBE Income or Loss of the jurisdiction where they are located.

Note 2.2.2: where the Filing Constituent Entity elects to apply the de minimis exclusion with respect to an eligible jurisdiction, the Filing Constituent Entity shall complete Section 3.2.4.6 (where applicable) for the jurisdiction. If Additional Current Top-up Tax arises in the jurisdiction, the Filing Constituent Entity shall also complete columns 1.4.8 to 1.4.9, columns 3.3.1.d to 3.3.1.f, Section 3.3.3 and Section 3.4 for the jurisdiction.

Note 2.2.2: the Filing Constituent Entity shall select whether this table is completed for purpose of the application of the de minimis exclusion or to provide computations with respect to Constituent Entities that are not Non-material Constituent Entities if Simplified Calculation for Non-material Constituent Entities is utilised under option (a) in 2.2.1.1 and the Simplified Calculations for Non-Material Constituent Entities apply only to a portion of the Constituent Entities in the subgroup identified in 2.1.3.

Note 2.2.2.1: the Filing Constituent Entity shall report here the sum of the revenue of Constituent Entities or members of JV Groups located in the jurisdiction before any adjustments under Chapter 3.

Note 2.2.2.2: the Filing Constituent Entity shall report here the sum of the GloBE Revenue of Constituent Entities or members of JV Groups located in the jurisdiction.

Note 2.2.2.3: the Filing Constituent Entity shall report here the aggregate FANIL of Constituent Entities or members of JV Groups located in the jurisdiction.

Note 2.2.2.4: the Filing Constituent Entity shall report here the sum of the GloBE Income or Loss of Constituent Entities or members of JV Groups located in the jurisdiction.

Notes 2.2.2.a-c: the Filing Constituent Entity shall report the relevant amounts in respect of the Reporting Fiscal Year, the first preceding fiscal year (if applicable) and the second preceding fiscal year (if applicable), respectively.

Note 2.2.2.d: where appropriate, the Average of the three Fiscal Years shall be computed by adjusting the corresponding revenue and income (or loss) calculations in proportion to the period covered by the preceding Fiscal Year over a calendar year.

MNE Group in the initial phase of international activity (if applicable)

Functioning of this section – MNE Group in the initial phase of international activity (if applicable)

The Top-up tax is reduced to zero for purposes of the UTPR if the MNE Group is in its initial phase of international activity (Article 9.3). Where a jurisdiction has adopted Article 9.3 in its QDMTT legislation, the Top-up tax is reduced to zero for purposes of the QDMTT if the MNE Group is in its initial phase of international activity (paragraph 118.51 of the QDMTT Commentary). If applicable, the table below provides information demonstrating that the MNE Group is eligible for the exclusion.

Note 2.3: when Article 9.3 applies, and no Group Entity is required to apply a QIIR, the Filing Constituent Entity does not need to complete Sections 2.1, 2.2 or Section 3 for the relevant jurisdictions for which the Top-up Tax is reduced to zero under Article 9.3.

Note 2.3.1: Article 9.3 does not apply for any Fiscal Year that starts later than five years after the first day of the Fiscal Year reported in 2.3.1. For MNE Groups in scope of the GloBE Rules when they come into effect, the date reported in 2.3.1 shall be replaced with the date when the UTPR rules come into effect.

Note 2.3.2: the Reference Jurisdiction is defined in Article 9.3.3.

Note 2.3.3: the Filing Constituent Entity shall report the Net Book Values of Tangible Assets of all Constituent Entities located in the jurisdiction for the Fiscal Year in which the MNE Group originally comes within the scope of the GloBE Rules.

Note 2.3.4: the location of Joint Ventures and JV Subsidiaries or Investment Entities that are not Excluded Entities is not taken into account to determine the number of jurisdictions where the MNE Group has Constituent Entities.

Note 2.3.5.a: the Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard of each jurisdiction, other than the Reference Jurisdiction, where Constituent Entities are located for the Fiscal Year in which the MNE Group originally comes within the scope of the GloBE Rules. The number of jurisdictions other than the Reference Jurisdiction shall be up to five.

Note 2.3.5.b: the Filing Constituent Entity shall report, for each jurisdiction, the Net Book Values of Tangible Assets of all Constituent Entities located in each of jurisdiction other than the Reference Jurisdiction for the Fiscal Year in which the MNE Group originally comes within the scope of GloBE Rules. Tangible Assets of Stateless Constituent Entities are considered held by Constituent Entities located in a jurisdiction other than the Reference Jurisdiction, except to the extent that the MNE Group demonstrates that those Tangible Assets are physically located in the Reference Jurisdiction. Tangible Assets of Joint Ventures and JV Subsidiaries or Investment Entities that are not Excluded Entities, are not taken into account to determine the Sum of the Net Book Values of Tangible Assets of all Constituent Entities located in other jurisdictions than the Reference Jurisdiction.

Note 2.3.6: the Filing Constituent Entity shall report the Number of jurisdictions where the MNE Group has Constituent Entities during the Reporting Fiscal Year. If the Reporting Fiscal Year is the Fiscal Year in which the MNE Group originally comes within the scope of GloBE Rules, this information shall not be reported as it can be derived from the information reported under 2.3.4.

Note 2.3.7: the Filing Constituent Entity shall report the sum of the Net Book Values of Tangible Assets of all Constituent Entities located in all jurisdictions other than the Reference Jurisdiction during the Reporting Fiscal Year. If the Reporting Fiscal Year is the Fiscal Year in which the MNE Group originally comes within the scope of GloBE Rules, this information shall not be reported as it can be derived from the information reported under 2.3.5.

3 GloBE Computations

Functioning of this section - GloBE Computations

The Filing Constituent Entity shall complete Section 3 on a jurisdictional basis, for each jurisdiction (or subgroup, where relevant) where exceptions to the GloBE computation do not apply. In this light, this section provides information to support the ETR and Top-up Tax computation made by the MNE Group, as well as further details about the computation of the Top-up Tax payable under the GloBE Rules.

Like the GloBE Rules, this section of the GloBE Information Return follows a jurisdictional approach. The Filing Constituent Entity is therefore required to report the relevant information on a jurisdictional basis. Under specific circumstances, the ETR and Top-up Tax computation shall be performed on a sub-group basis.

Section 3.1 therefore requires the identification of such subgroups.

Section 3.2 contains jurisdictional information that is relevant for the computation of the ETR and more detailed information at the entity level. The Filing Constituent Entity may elect to use a transitional simplified jurisdictional reporting framework as discussed in Section 3.2.4.a.

Then, for jurisdictions where Top-up Tax, Additional Current Top-up Tax, or QDMTT apply, the Filing Constituent Entity shall complete Section 3.3.

Finally, Section 3.4 identifies each Parent Entity's Allocable Share of Top-up Tax and provides more details on the computation of the UTPR Top-up Tax Amount, if any, as well as of the UTPR Percentage for each UTPR Jurisdiction, where relevant.

The Filing Constituent Entity shall file the GloBE Computations section for a jurisdiction with the tax administration of a jurisdiction in the same instances as outlined in respect of the Jurisdictional Safe Harbours and Exclusions section. An exception applies with respect to UTPR Jurisdictions that have taxing rights under the UTPR but a UTPR Percentage of zero. The Filing Constituent Entity shall file the information on the attribution of Top-up Tax under the UTPR (i.e. the relevant row of table 3.4.3 only) instead of the whole jurisdictional section with the tax administration of these jurisdictions.

3.1. Characteristics of the Jurisdiction

Note 3.1: the Filing Constituent Entity shall report the information in respect of each jurisdiction where the MNE Group has Constituent Entities or where members of JV Groups are located.

Note 3.1.1: the Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction. The Filing Constituent Entity shall report "Stateless" for each Stateless Constituent Entity.

Note 3.1.2: a “subgroup” shall be identified for each perimeter of GloBE computation. Several subgroups can be identified in this row. The relevant option(s) shall be selected: Constituent Entities • Minority-Owned Subgroup (specify which Minority-Owned Subgroup) • Standalone MOCEs • Investment Entities • Joint Venture Group (specify which JV Group) • Stateless Constituent Entity. Standalone MOCEs are Minority-Owned Constituent Entities that are not part of any Minority-Owned Group. Investment Entities also include JVs or JV subsidiaries that qualify as Investment Entities but do not include Investment Entities for which an election is made under Article 7.5. Minority-Owned Subgroups may be made of members of JV Groups. Stateless Constituent Entities also include members of JV Groups that are Stateless. The Filing Constituent Entity shall report the relevant information in Sections 3.2 for each subgroup.

Note 3.1.3: the Filing Constituent Entity shall report the TIN of the Entity at the top of the ownership structure of each subgroup identified in row 3.1.2.

Note 3.1.4: the Filing Constituent Entity shall report the names of the jurisdiction(s) with taxing rights in respect of the jurisdiction identified in 3.1.1 and, if applicable, the relevant subgroup identified in 3.1.2 in the form of 2-character alphabetic country codes based on the ISO 3166-1 Alpha 2 standard. A jurisdiction has taxing rights in respect of another, where, under the rule order provided in the GloBE Rules, the Jurisdictional Top-up Tax computed in respect of the latter jurisdiction would result in a Top-up Tax liability due by a Constituent Entity located in the former jurisdiction under the charging provisions in the former jurisdiction. Specifically, a QDMTT Safe Harbour jurisdiction or a jurisdiction with an Income Inclusion Rule that applies to domestic entities will have taxing rights in respect of itself. Further, several jurisdictions may have taxing rights in respect of the same other jurisdiction. This may be the case, for instance, when both the UPE and a Partially-Owned Parent Entity are required to apply the IIR in respect of a Constituent Entity located in a third jurisdiction. In that case, both the UPE jurisdiction and the Partially-Owned Parent Entity jurisdiction need to be reported under 3.1.4. Equally, UTPR jurisdictions would all have taxing rights in respect of the jurisdictions for which the Top-up Tax is not reduced to zero under Article 2.5.

Note 3.1.5 to 3.1.10: these data points do not need to be reported if only a single jurisdiction is reported as having taxing rights in 3.1.4 or if the QDMTT Safe Harbour applies with respect to the jurisdiction (in 3.1.1) or subgroup (in 3.1.3). Each data point should be reported separately for each jurisdiction with taxing rights identified under 3.1.4 (“the relevant jurisdiction with taxing rights”). If there is no difference, the Filing Constituent Entity shall report “No difference”.

Note 3.1.5: the Filing Constituent Entity shall report the Effective Tax Rate for a jurisdiction identified in 3.1.1 or a subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this Effective Tax Rate is different to the Effective Tax Rate reported in 3.2.1.e.

Note 3.1.6: this data point should only be reported if a different Effective Tax Rate is reported in 3.1.5 for a jurisdiction identified in 3.1.1 or a subgroup identified in 3.1.3. The Filing Constituent Entity shall report the aggregate Adjusted Covered Taxes calculated for that jurisdiction or subgroup on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this amount is different to the amount reported in 3.2.1.d.

Note 3.1.7: this data point should only be reported if a different Effective Tax Rate is reported in 3.1.5 for a jurisdiction identified in 3.1.1 or a subgroup identified in 3.1.3. The Filing Constituent Entity shall report the Net GloBE Income calculated for that jurisdiction or subgroup on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this amount is different to the amount reported in 3.2.1.b.

Note 3.1.8: this data point should only be reported if a different Top-up Tax payable is reported in 3.1.10 for a jurisdiction identified in 3.1.1 or a subgroup identified in 3.1.3. The Filing Constituent Entity shall report the Substance-based Income Exclusion for that jurisdiction or subgroup on the basis of the domestic

legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this amount is different to the amount reported in 3.3.1.b.

Note 3.1.9: the Filing Constituent Entity shall report the Additional Current Top-up Tax Amount for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this amount is different to the amount reported in 3.3.1.d.

Note 3.1.10: the Filing Constituent Entity shall report the Top-up Tax payable for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this amount is different to the amount reported in 3.3.1.f.

Note 3.1.11: the Filing Constituent Entity shall report whether there is a difference in the applicability of the elections reported under 3.2.3 for a jurisdiction identified in 3.1.1 or a subgroup identified in 3.1.3 and those elections under the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4.

Note 3.1.12 to 3.1.15: these data points should be reported separately for each jurisdiction with taxing rights identified under 3.1.4 (“the relevant jurisdiction with taxing rights”). The questions should only be answered if a difference has been reported in 3.1.6. If there is no difference for a given question, the Filing Constituent Entity shall report “No difference”.

Note 3.1.12: the Filing Constituent Entity shall report the aggregate current tax expense with respect to Covered Taxes after allocations in Article 4.3 (see 3.2.1.2.a.1) for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4.

Note 3.1.13: the Filing Constituent Entity shall report the adjustment made under Article 4.1.2(d) in relation to Qualified Refundable Tax Credits or Marketable Transferable Tax Credits in the computation of Adjusted Covered Taxes (see 3.2.1.2.a.2.d) for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4.

Note 3.1.14: the Filing Constituent Entity shall report the adjustment made in the computation of Adjusted Covered Taxes under Article 4.1.3(b) in relation to Non-Qualified Refundable Tax Credits or Non-Marketable Transferable Tax Credits or Other Tax Credits not recorded as a reduction to current tax expense (see 3.2.1.2.a.2.g) for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4.

Note 3.1.15: the Filing Constituent Entity shall report the Deferred tax expense amount (see 3.2.2.1.a.1) for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4.

Note 3.1.16 to 3.1.18 these data points should be reported separately for each jurisdiction with taxing rights identified under 3.1.4 (“the relevant jurisdiction with taxing rights”). The Filing Constituent Entity shall report “No difference” if there is no difference.

Note 3.1.16: this data point should only be reported if a difference has been reported in 3.1.7. The Filing Constituent Entity shall report the adjustment made under Article 3.2.4 in relation to Qualified Refundable Tax Credits or Marketable Transferable Tax Credits in the computation of GloBE Income or Loss (see 3.2.1.1.2.n) for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.5.

Note 3.1.17: the Filing Constituent Entity shall report the Excess Negative Tax Carry-forward Balance remaining for subsequent years for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this amount is different to the amount reported in 3.2.1.2.b.4.

Note 3.1.18: the information should only be reported if the Reporting Fiscal Year is the Transition Year for the jurisdiction identified in 3.1.1 or subgroup identified in 3.1.3. The Filing Constituent Entity shall complete 3.2.2.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if there is a difference between this information and the information reported in 3.2.2.3.

3.2. ETR computation

Functioning of this section – ETR computation

This section contains jurisdictional information that is relevant for the computation of the ETR.

In Section 3.2.1, a breakdown of all the adjustments made to the FANIL and to the current tax expense of all Constituent Entities or members of JV Groups is provided on a jurisdictional basis to identify the net GloBE Income or Loss of the jurisdiction as well as the Adjusted Covered Taxes for the jurisdiction.

Section 3.2.2 includes information on the jurisdictional computations that relate to deferred tax accounting such as the adjustments to the deferred tax expense and the application of the recapture mechanism. It also includes information relevant for the application of the transition rules.

Section 3.2.3 includes information on the jurisdictional elections that are made by the Filing Constituent Entity.

In section 3.2.4, a breakdown of adjustments presented in Section 3.2.1 is also provided for each Constituent Entity or member of JV Group. The Filing Constituent Entity may elect to use a transitional simplified jurisdictional reporting framework during the transition period as discussed in Section 3.2.4.a. If so, all adjustments identified in section 3.2.4 may not need to be reported.

3.2.1 ETR

Note 3.2.1.a: the Filing Constituent Entity shall report the aggregate amount of Financial Accounting Net Income or Loss determined for all Constituent Entities (or members of JV Group) located in the jurisdiction in preparing the Consolidated Financial Statements of the UPE.

Note 3.2.1.b: the Filing Constituent Entity shall report the Net GloBE Income or Loss for the jurisdiction. If there is more than one Investment Entity located in the jurisdiction, the Filing Constituent Entity shall report sum of the MNE Group's Allocable Shares of each Investment Entity's GloBE Income or Loss as determined under Article 7.4.4.

Note 3.2.1.c: the Filing Constituent Entity shall report the aggregate amount of income tax expense that is recorded in the financial accounts of Constituent Entities (or members of JV Group) located in the jurisdiction.

Note 3.2.1.d: the Filing Constituent Entity shall report the aggregate amount of Adjusted Covered Taxes of all Constituent Entities (or members of JV Groups) located in the jurisdiction. If there is more than one Investment Entity located in the jurisdiction, the Filing Constituent Entity shall report the sum of the Adjusted Covered Taxes of each Investment Entity as determined under Article 7.4.3.

Note 3.2.1.e: the Filing Constituent Entity shall report the Effective Tax Rate for the jurisdiction. The Filing Constituent Entity shall not complete this column if the MNE Group (or the relevant subgroup) has a GloBE Loss in the jurisdiction.

3.2.1.1 Computation of GloBE Income (Loss)

Functioning of this section – Computation of GloBE Income (Loss)

In the table below, the Filing Constituent Entity is required to report all the adjustments made to the FANIL of all the Constituent Entities or members of JV Groups located in the jurisdiction, on an aggregate basis. The FANIL is the starting point for the computation of the GloBE Income or Loss. The Filing Constituent Entity is required to identify the net amount of each type of adjustment made to the FANIL on an aggregate basis, at the jurisdictional level, by reporting the relevant amount of the adjustment being made in the table below.

Note 3.2.1.1.1: the Filing Constituent Entity shall report the aggregate FANIL of Constituent Entities or members of JV Groups located in the jurisdiction after the allocation of GloBE Income or Loss between Main Entities and Permanent Establishments (Article 3.4) and the allocation of GloBE Income or Loss from Flow-through Entities (Article 3.5). Article 3.5 also covers the allocation of GloBE Income or Loss from an Investment Entity or an Insurance Investment Entity that is treated as a Tax Transparent Entity as a result of the election under Article 7.5.

Note 3.2.1.1.2.b: the Filing Constituent Entity shall report the adjustments related to Excluded Dividends. Where a movement in an insurance company's reserve economically matches an Excluded Dividend (net of the investment management fee) from a security held on behalf of a policyholder, the movement in the insurance reserves shall be reported as a positive adjustment (addition to the FANIL) in row 3.2.1.1.2.b.

Note 3.2.1.1.2.c: the Filing Constituent Entity shall report the adjustments related to Excluded Equity Gain or Loss. The amount of those adjustments shall also include foreign exchange gains or losses attributable to hedging instruments when the election to treat those foreign exchange gains or losses as an Excluded Equity Gain or Loss has been made. The expense from movements in insurance reserves related to Excluded Equity Gains or Losses from securities held on behalf of policyholders shall be reported as a positive adjustment (addition to the FANIL) in row 3.2.1.1.2.c. The amount of the adjustments shall not include equity gain or loss that are not excluded pursuant to an Equity Investment Inclusion Election.

Note 3.2.1.1.2.k: the Filing Constituent Entity shall report the reductions made to the Financial Accounting Net Income or Loss of the Constituent Entities where the Entities are subject to a debt release and the income is excluded from the GloBE Income pursuant to Article 3.2.1 and related agreed Administrative Guidance.

Note 3.2.1.1.2.n: the Filing Constituent Entity shall report the adjustments made to the Financial Accounting Net Income or Loss pursuant to Article 3.2.4. In particular, any amount that is recorded as a reduction in current income tax expense (or other Covered Taxes) in the financial accounts and that should be treated as income, is included as a positive adjustment and any amount that is recorded as income in the financial accounts and that should be treated as a reduction in current income tax expense (or other Covered Taxes), is included as a negative adjustment.

Note 3.2.1.1.2.z: the Filing Constituent Entity shall report the adjustments made to the Financial Accounting Net Income or Loss of the Constituent Entities where the entities are subject to an adjustment under Article 9.1.3.

Note 3.2.1.1.3: the Filing Constituent Entity shall report the Net GloBE Income (Loss) of the Jurisdiction.

3.2.1.2 Computation of Adjusted Covered Taxes

Functioning of this section – Computation of Adjusted Covered Taxes

The table below follows a similar approach as for the computation of the net GloBE Income or Loss of the Jurisdiction. The Filing Constituent Entity is required to report all the adjustments made to the current tax expense with respect to Covered Taxes accrued in Financial Accounting Net Income or Loss of all the Constituent Entities or members of JV Groups located in the jurisdiction, on an aggregate basis. The Filing Constituent Entity is required to identify the net amount of each type of adjustment made to the current tax expense on an aggregate basis, at the jurisdictional level, by reporting the relevant amount of the adjustment being made in the table below.

(a) Total amount of Adjusted Covered Taxes

Note 3.2.1.2.a.1: the Filing Constituent Entity shall report the aggregate current tax expense (with respect to Covered Taxes accrued in Financial Accounting Net Income or Loss of all the Constituent Entities or members of JV Groups located in the jurisdiction) after the allocation of Covered Taxes from one Constituent Entity to another Constituent Entity (Article 4.3). Article 4.3 also covers the allocation of Covered Taxes from an Investment Entity or an Insurance Investment Entity that is treated as a Tax Transparent Entity as a result of the election under Article 7.5. Post-filing adjustments identified in this table do not include the adjustments made for a Fiscal Year other than the Reporting Fiscal Year in accordance with an ETR Adjustment Article. The post-filing adjustments related to Article 4.6.1 are the adjustments resulting in a material decrease in Covered Taxes for a previous Fiscal Year and the adjustments resulting in an immaterial decrease when an election is not made under 4.6.1.

Note 3.2.1.2.a.2.d: the Filing Constituent Entity shall report the amount of the adjustment made pursuant to Article 4.1.2(d) in respect of a Qualified Refundable Tax Credit or Marketable Tax Credit that is recorded as a reduction in current income tax expense (or other Covered Taxes) in the financial accounts.

Note 3.2.1.2.a.2.g: the Filing Constituent Entity shall report the amount of the adjustment made pursuant to Article 4.1.3(b) in respect of a non-Qualified Refundable Tax Credit, non-Marketable Transferable Tax Credit or Other Tax Credit that is recorded as income and not as a reduction in current income tax expense (or other Covered Taxes) in the financial accounts.

Note 3.2.1.2.a.2.h: pursuant to Article 4.1.3(c), the Filing Constituent Entity shall report the amount of Covered Taxes which were claimed as Covered Tax in a previous fiscal year (subject to GloBE rules) and that is refunded or credited in the current fiscal year. Qualified Refundable Tax Credits and Marketable Transferable Tax Credits are excluded from the scope of application of this rule.

Note 3.2.1.2.a.2.s: the Filing Constituent Entity shall report the Excess Negative Tax Expense Carry-Forward generated for the reporting Fiscal Year pursuant to Article 5.2.1 or an election under Article 4.1.5 in accordance with related agreed Administrative Guidance. The same amount shall also be reported in 3.2.1.2.b.2.

Note 3.2.1.2.a.2.t: the Filing Constituent Entity shall report the decrease in Adjusted Covered Taxes in relation to the remaining balance of the Excess Negative Expense Carry-forward pursuant to Article 5.2.1 or an election under Article 4.1.5 in accordance with related agreed Administrative Guidance. The decrease is the same amount as reported in 3.2.1.2.b.3 but cannot exceed the amount of Adjusted Covered Taxes obtained as a result of the other adjustments.

Note 3.2.1.2.a.3: the Filing Constituent Entity shall report the Adjusted Covered Taxes of all Constituent Entities or members of JV Groups located in the jurisdiction.

(b) Excess Negative Tax Expense Carry-forward

Note 3.2.1.2.b.1: the Balance from prior years is the remaining amount of Excess Negative Tax Expense Carry-forward for the jurisdiction that has not yet effectively reduced the amount of Adjusted Covered Taxes for the jurisdiction.

Note 3.2.1.2.b.2: the Filing Constituent Entity shall report the Excess Negative Tax Expense Carry-forward generated for the Reporting Fiscal Year for the jurisdiction. The Excess Negative Tax Expense Carry-forward generated for the jurisdiction equals the Additional Current Top-up Tax under Article 4.1.5 for the jurisdiction reported under 3.3.3.2.4 if the election for the Excess Negative Tax expense administrative procedure is made for the Reporting Fiscal Year, pursuant to Article 4.1.5 and related agreed Administrative Guidance. The Excess Negative Tax Expense attributable to an amount of a loss that is carried back and applied against income for prior taxable years must be deducted from the amount of Excess Negative Tax Expense Carry-forward. Under Article 5.2.1, the Excess Negative Tax Expense Carry-forward generated for the jurisdiction is computed for a Fiscal Year in which the MNE Group has a Top-up Tax Percentage for a jurisdiction that exceeds the Minimum Rate due to negative Adjusted Covered Taxes. In such a case, the Excess Negative Tax Expense Carry-forward for the jurisdiction is equal to the absolute amount of negative Adjusted Covered Taxes.

Note 3.2.1.2.b.3: the Filing Constituent Entity shall report the Excess Negative Tax Expense Carry-forward utilized for the Reporting Fiscal Year for the jurisdiction. The Excess Negative Tax Expense Carry-forward utilised for the jurisdiction shall be the lower of the remaining balance of the Excess Negative Tax Expense Carry-forward and the Adjusted Covered Taxes computed for the Reporting Fiscal Year.

Note 3.2.1.2.b.4: the Negative Tax Expense Carry-forward remaining for subsequent years is the sum of the Balance from prior years and the Excess Negative Tax Expense Carry-forward generated for the Reporting Fiscal Year for the jurisdiction after deducting the Excess Negative Tax Expense Carry-forward utilised for the Reporting Fiscal Year.

(c) Transitional Blended CFC Regime calculation (if any)

Note 3.2.1.2.c: the Filing Constituent Entity shall complete this table if Blended CFC Tax is allocated (i) from a Constituent Entity-owner located in this jurisdiction and belonging to this subgroup or (ii) to Constituent Entities located in this jurisdiction and belonging to this subgroup pursuant to Article 4.3.2(c) and the related Administrative Guidance.

Note 3.2.1.2.c.1: the Filing Constituent Entity shall report the jurisdictions where the Constituent Entities which were allocated Blended CFC Tax under the Blended CFC Tax Regime are located. The jurisdictions shall be reported in the form of 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard.

Note 3.2.1.2.c.2: the Filing Constituent Entity shall report the subgroup of the Constituent Entities which were allocated Blended CFC Tax under the Blended CFC Tax Regime. This subgroup is the same as the one identified in 3.1.3.

Note 3.2.1.2.c.3: the Filing Constituent Entity shall report the Blended CFC Tax allocated for the Fiscal Year from the Constituent Entity-owner to Constituent Entities located in the jurisdiction identified in the first column.

3.2.2. Jurisdictional computations relating to deferred tax accounting

3.2.2.1 Deferred Tax adjustments

(a) High-level summary

Note 3.2.1.1.a.1.a: the Filing Constituent Entity shall report the aggregate deferred tax expense amount in the Financial Accounts for all Constituent Entities or members of JV Groups located in the jurisdiction. If the deferred tax expense is recorded as a debit to the deferred tax expense account, the amount shall be presented as a positive number. If the deferred tax expense is recorded as credit to the deferred tax expense account, the amount shall be presented as a negative amount.

Note 3.2.1.1.a.1.b: the Filing Constituent Entity shall report the deferred tax expense included in the financial accounts in relation to assets or liabilities for which the GloBE carrying value is different to the accounting carrying value for all Constituent Entities or members of JV Groups located in the jurisdiction.

Note 3.2.1.1.a.1.c: the Filing Constituent Entity shall report the deferred tax expense based on the GloBE carrying value of assets or liabilities for which the GloBE carrying value is different to the accounting carrying value for all Constituent Entities or members of JV Groups located in the jurisdiction.

Note 3.2.1.1.a.1.d: the Filing Constituent Entity shall report the deferred tax expense for GloBE purposes before any recasting and adjustments.

Note 3.2.1.1.a.2: the total amount of the adjustments shall be the total amount of the adjustments in 3.2.2.1.b.2.

Note 3.2.1.1.a.3.e: the Filing Constituent Entity shall report the deferred tax expense for GloBE purposes before any recasting.

Note 3.2.1.1.a.3.f: the Filing Constituent Entity shall recast at the Minimum Rate any deferred tax asset attributable to a GloBE Loss (Article 4.4.3.) that was recorded at a lower tax rate and report the amount of the difference between the deferred tax expense recorded at a lower tax rate than the Minimum Rate and the deferred tax expense based on the Minimum Rate. The difference shall be presented as a negative amount when it is attributable to the recognition of a GloBE Loss deferred tax asset, and the difference shall be presented as a positive amount when it is attributable to the reversal of such deferred tax asset.

Note 3.2.1.1.a.3.g: the Filing Constituent Entity shall recast at the Minimum Rate any deferred tax expense that has been recorded at a higher tax rate than the Minimum Rate and report the amount of difference between the deferred tax expense recorded at a higher tax rate than the Minimum Rate and the deferred tax expense based on the Minimum Rate. If the deferred tax expense for the Fiscal Year before any recasting is taken into account as a credit to the deferred tax expense account, the amount of the difference shall be presented as a positive amount. If the deferred tax expense before any recasting for the Fiscal Year is taken into account as a debit to the deferred tax expense account, the amount of the difference shall be presented as a negative amount.

Note 3.2.1.1.a.4: the Filing Constituent Entity shall report the Total Deferred Tax Adjustment Amount for the jurisdiction.

(b) Breakdown of the adjustments

Note 3.2.1.1.b: the Filing Constituent Entity shall report the adjustments determined before any recasting as broken down in the table. If the adjustment leads to an increase to the Total Deferred Tax Adjustment Amount, the amount shall be presented as a positive number. If the adjustment leads to a decrease to the Total Deferred Tax Adjustment Amount, the amount shall be presented as a negative number.

Note 3.2.1.1.b.1.f: the Filing Constituent Entity shall report the adjustments of deferred tax expense in the Financial Accounts related to tax credits before any adjustments for Substitute Loss Carry-forward DTA and deemed Substitute Loss Carry-forward DTA.

Note 3.2.1.1.b.1.g: the Filing Constituent Entity shall report the adjustments related to Substitute Loss Carry-forward DTA and deemed Substitute Loss Carry-forward DTA pursuant to the related Administrative Guidance.

Note 3.2.1.1.b.1.p: the Filing Constituent Entity shall report the adjustments to the deferred tax expense resulting from transactions between Constituent Entities and the application of Article 9.1.3

Note 3.2.1.1.b.2: the Filing Constituent Entity shall report the total amount of the adjustments. This total amount shall be the same amount reported in 3.2.2.1.a.5.

(c) Loss carry backs

Functioning of this section – Loss carry backs

This section applies when a domestic tax loss is carried back to a prior Fiscal Year and gives rise to a tax refund. Unless the refund is immaterial as defined in Article 4.6.1 and the Filing Constituent Entity has elected to take such amount into account in the current Fiscal Year, the Filing Constituent Entity shall report the amount of deemed deferred tax assets that shall be established, together with the refund of Covered Taxes that was issued, with respect to each Prior Fiscal Year to which the loss is carried back.

Note 3.2.1.1.c.1.a,b, etc: the Filing Constituent Entity shall report the amount of deferred tax assets that shall be treated as reversed for a prior Fiscal Year to which the domestic tax loss has been carried back.

Note 3.2.1.1.c.2.a,b, etc: the Filing Constituent Entity shall report the refund of Covered Taxes relating to a domestic tax loss carried back to a prior Fiscal Year. The amount of the refund shall match with the domestic tax loss that has been carried back to the prior Fiscal Year.

Note 3.2.1.1.c.1.c: the Filing Constituent Entity shall report the total amount of deemed deferred tax assets that shall be treated as reversed for prior Fiscal Years. This total amount should be capped at an amount equal to the domestic tax loss multiplied by the Minimum Rate as provided in paragraphs 124-126 of the Commentary under Article 4.6.1.

Note 3.2.1.1.c.2.c: the Filing Constituent Entity shall report the total amount of refund of Covered Taxes. This total amount shall be the amount of refund of tax with respect to loss carry backs issued in the Reporting Fiscal Year.

Note 3.2.1.1.c.1.c and 3.2.1.1.c.2.c: the difference between the 3.2.2.1.c.1.c and 3.2.2.1.c.2.c would be the adjustment to the Covered Tax for the Reporting Fiscal Year with respect to loss carry backs. The amount shall be taken into account for the adjustment under Article 4.6.1 for the Reporting Fiscal Year reported in 3.2.1.2.a.1.k.

3.2.2.2 Recapture mechanism

Functioning of this section – Recapture mechanism

The purpose of the following table is to identify whether there is any deferred tax liability to be recaptured under Article 4.4.4.

The table identifies any deferred tax liability that is not a Recapture Exception Accrual, recorded for the Reporting Fiscal Year and the five preceding Fiscal Years. The Filing Constituent shall report the deferred tax liability that is reversed in each subsequent Fiscal Year to determine whether there is Recaptured Deferred Tax Liability.

Note 3.2.2.2.a.1: the Filing Constituent Entity shall report the total amount of DTLs, except for Recapture Exception Accruals, taken into account under Article 4.4 in computing Adjusted Covered Taxes for the fifth Fiscal Year preceding the Reporting Fiscal Year.

Note 3.2.2.2.a.2: the Filing Constituent Entity shall report the total amount of Recaptured Deferred Tax Liability determined in the Reporting Fiscal Year in relation to the fifth Fiscal Year preceding the Reporting Fiscal Year. This amount will be used in connection with the reporting requirements related to the Additional Current Top-up Tax are identified in 3.3.3.

Note 3.2.2.2.a.3: the Filing Constituent Entity shall report the total amount of DTLs, except for Recapture Exception Accruals, taken into account under Article 4.4 for the Reporting Fiscal Year.

Note 3.2.2.2.b: the Filing Constituent Entity shall complete this table with respect to the DTLs tracked on an aggregated basis, i.e. on the basis of a General Ledger account or of an Aggregate DTL Category, excluding DTLs tracked on an item-by-item basis.

Note 3.2.2.2.b.a.1 and 3.2.2.2.b.a.2: the Filing Constituent Entity shall report the amount of pre-Transition Year DTLs after reversals allocated to pre-Transition Year DTLs for the Reporting Fiscal Year and immediately Prior Fiscal Year.

Note 3.2.2.2.b.b.1 and 3.2.2.2.b.b.2: the Filing Constituent Entity shall report the amount of Outstanding Balance for the Reporting Fiscal Year and immediately Prior Fiscal Year.

Note 3.2.2.2.b.c.1 and 3.2.2.2.b.c.2: the Filing Constituent Entity shall report the amount of Unjustified Balance for the Reporting Fiscal Year and immediately Prior Fiscal Year.

3.2.2.3 Transition rules

Functioning of this section – Transition rules

The purpose of the following tables is to identify pre-existing deferred tax accounting attributes to be taken into account at the beginning of the Transition Year.

Table (a) requires the identification of the deferred tax assets and deferred tax liabilities that could be utilised in calculating ETR in a jurisdiction in the Transition Year and subsequent years.

Table (b) requires the information of the disposing Entity's carrying value of the transferred assets for GloBE purposes with the deferred tax assets and liabilities brought into GloBE based on that basis in the case of a transfer of assets between Constituent Entities or members of JV Groups after 30 November 2021 and before the Transition Year.

Note 3.2.2.3: row 3.2.2.3.1 (i.e. the Transition Year) shall be reported every year, whereas all the other information of this section shall be reported in the GloBE Information Return only when the Reporting Fiscal Year is also the Transition Year.

(a) Application of Article 9.1.1 and 9.1.2

Note 3.2.2.3.a.1: the Deferred tax liabilities at the beginning of the Transition Year is the aggregate amount of Deferred tax liabilities that have been recorded in the financial accounts at the beginning of the Transition Year for a jurisdiction, which shall not include any deferred tax liability arising from a transfer of assets between Constituent Entities or members of JV Groups after 30 November 2021 and before the commencement of a Transition Year. These deferred tax liabilities shall be reflected in the table that relates to the application of Article 9.1.3.

Note 3.2.2.3.a.2: the recast at the Minimum Rate does not apply if the applicable domestic tax rate is lower than the Minimum Rate.

Note 3.2.2.3.a.3 the deferred tax assets at the beginning of the Transition Year is the aggregate amount of Deferred tax assets that have been recorded in the financial accounts at the beginning of the Transition Year for a jurisdiction, which shall not include any deferred tax assets arising from a transfer of assets between Constituent Entities or members of JV Groups after 30 November 2021 and before the commencement of a Transition Year. These deferred tax assets shall be reflected in the table that relates to the application of Article 9.1.3.

Note 3.2.2.3.a.4: the recast at the Minimum Rate does not apply if the applicable domestic tax rate is lower than the Minimum Rate, unless it could be demonstrated that the deferred tax asset is attributable to a GloBE Loss, in this case, the deferred tax asset that has been recorded at a rate lower than the Minimum Rate could be recast at the Minimum Rate.

Note 3.2.2.3.a.5: deferred tax assets arising from items excluded from the computation of GloBE Income or Loss under Chapter 3 should be excluded if such deferred tax assets are generated in a transaction that takes place after 30 November 2021.

Note 3.2.2.3.a.6: deferred tax assets taken into account for GloBE purposes is the aggregate amount of deferred tax assets that should be recognized for purposes of the GloBE Rules at the beginning of the Transition Year.

(b) Application of Article 9.1.3

Note 3.2.2.3.b.1: the Filing Constituent Entity shall list all jurisdictions in which disposing Constituent Entities or members of JV Groups are located when such Constituent Entities or members of JV Groups

have disposed assets to Constituent Entities or members of JV Groups located in this jurisdiction after 30 November 2021 and before the commencement of a Transition Year. Those jurisdictions in which disposing Constituent Entities or members of JV Group are located could be the same jurisdiction of the acquiring entities. The Filing Constituent Entity shall identify the jurisdiction (in the form of a 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard) of the disposing Constituent Entity or member of JV Group. The Filing Constituent Entity shall report “Stateless” for Stateless Constituent Entities.

Note 3.2.2.3.b.2: the filing CE shall report the amount of tax paid in respect of the transaction(s).

Note 3.2.2.3.b.3: the filing CE shall report the net amount of the aggregate pre-existing deferred tax assets or liabilities on the transferred asset(s) reflected in the financial accounts of the disposing Constituent Entity (or Constituent Entities). Deferred tax assets shall be reported as a positive number and deferred tax liabilities shall be reported as a negative number.

Note 3.2.2.3.b.4: the Carrying Value of the transferred assets for GloBE purposes is the aggregate amount of the Carrying Value of the transferred assets that should be recognised for purposes of the GloBE Rules at the beginning of the Transition Year. This amount shall be determined by adjusting the financial accounting carrying value upon disposition of the transferred asset on the day of the transfer. The financial accounting carrying value upon disposition shall be adjusted as appropriate pursuant to Article 9.1.3 and further adjusted for capital expenditures, amortization or depreciation that were recorded after the transaction and before the beginning of the Transition Year.

Note 3.2.2.3.b.5: the net deferred tax asset or liability with respect to the transferred assets for GloBE purposes is the net amount of the aggregate deferred tax assets and liabilities that should be recognised for purposes of the GloBE Rules at the beginning of the Transition Year with respect to the transferred assets. This amount shall be determined by adjusting the net amount of the aggregate pre-existing deferred tax assets and liabilities as accrued in the financial accounts of the disposing entity prior to the transfer, in relation to the transferred assets. The net amount of the aggregate pre-existing deferred tax assets and liabilities shall be adjusted as appropriate pursuant to Article 9.1.3. Deferred tax assets shall be reported as a positive number and deferred tax liabilities shall be reported as a negative number.

3.2.3. Jurisdictional elections (if any)

Functioning of this section – jurisdictional elections (if any)

Article 8.1.4(d) provides that the GloBE Information Return includes a record of the elections made in accordance with the relevant provisions of the GloBE Rules. The tables below make a distinction between: (i) jurisdictional elections (i.e. elections that apply to all Constituent Entities (or members of JV Group) located in a jurisdiction); and (ii) Constituent Entity elections (i.e. elections that apply to single Constituent Entities or members of JV Group). The tables further identify: (i) annual elections, and (ii) Five-Year Elections. For Five-Year Elections, the Filing Constituent Entity is also required to report the revocation year, i.e. the year where the election was revoked (if any). The GloBE Loss Election is identified separately and the Filing Constituent Entity is required to report the Election Year and the revocation year (which can happen only once).

3.2.3.1 Jurisdictional elections (other than Article 7.3.1)

Note 3.2.3.1: jurisdictional elections are elections that apply to all Constituent Entities (or members of a JV Group) located in the jurisdiction.

(a) Elections

Note 3.2.3.1.a.1.c: if the Filing Constituent Entity does not complete table 3.3.2 for the jurisdiction, it is assumed that the election in 3.2.3.1.a.1.c to not apply the Substance Based Income Exclusion has been made for the jurisdiction.

Note 3.2.3.1.a.3: for Five-year Elections, the Filing Constituent Entity shall report the Election Year.

Note 3.2.3.1.a.4: for Five-year Elections, the Filing Constituent Entity shall report the year where the election was revoked (if any). The Filing Constituent Entity shall report the revocation year in the GloBE Information Return filed for the revocation year and in the GloBE Information Returns filed for the four Fiscal Years succeeding the revocation year.

Note 3.2.3.1.a.5.j: the Filing Constituent Entity can only make the GloBE Loss Election with the first GloBE Information Return that includes the jurisdiction for which the election is made. If the election is subsequently revoked, the Filing Constituent Entity cannot make a new election for the same jurisdiction.

Note 3.2.3.1.a.6: the Filing Constituent Entity shall report the year where the election was revoked (if any). The Filing Constituent Entity shall report the revocation year in the GloBE Information Return filed for the revocation year and in the GloBE Information Returns filed for all Fiscal Years succeeding the revocation year.

(b) Information requirements related to jurisdictional elections

Note 3.2.3.1.b.1: the Filing Constituent Entity shall report the equity gain or loss that is included in the GloBE Income or Loss when the Equity Investment Inclusion Election is made.

Note 3.2.3.1.b.2: the Balance of the owner's investment in a Qualified Ownership Interest from prior years is the remaining amount of the owner's investment in Qualified Ownership Interest for the jurisdiction that has not yet reduced by receipts.

Note 3.2.3.1.b.3: the Filing Constituent Entity shall report the increase in the owner's investment in a Qualified Ownership Interest for the Reporting Fiscal Year for the jurisdiction.

Note 3.2.3.1.b.4: the Filing Constituent Entity shall report the decrease in the owner's investment in a Qualified Ownership Interest for the Reporting Fiscal Year for the jurisdiction pursuant to the related Administrative Guidance. The decrease cannot exceed the owner's investment and cause the investment below zero.

Note 3.2.3.1.b.5: the outstanding balance of owner's investment in a Qualified Ownership Interest is the sum of the balance from prior years and additions to the owner's investment in a Qualified Ownership Interest after deducting the receipts with respect to the Qualified Ownership Interest for the Reporting Fiscal Year.

3.2.3.2 Election for Article 7.3.1

(a) Recapture mechanism for Article 7.3

Functioning of this section – Recapture mechanism for Article 7.3

The table below identifies the outstanding balances of Deemed Distribution Tax Recapture Accounts established for each prior Fiscal Year in which the election in Article 7.3.1 applies. If there is an outstanding balance of a Deemed Distribution Tax Recapture on the last day of the 4th Fiscal Year after the Fiscal Year for which such account was established, the amount must be recaptured under Article 5.4.1. If a Departing Constituent Entity (or member of JV Group) leaves the MNE Group (or JV Group) or transfers substantially all of its assets, the Effective Tax Rate and Top-up Tax for each preceding year is re-calculated in accordance with the principles of Article 5.4.1.

Note 3.2.3.2.a.2: the Filing Constituent entity shall report the amount of the Deemed Distribution Tax determined under Article 7.3.2 for the Fiscal Year for which it was established.

Note 3.2.3.2.a.3: at the end of each succeeding Fiscal Year, the outstanding balances of Deemed Distribution Tax Recapture Accounts are reduced in chronological order but not below zero, as provided under Article 7.3.3, by the tax paid by the Constituent Entities (or members of JV Groups), by the amount of any Net GloBE Loss of the jurisdiction multiplied by the Minimum Rate and then by the amount of Recapture Account Loss Carry-forward applied to the current Fiscal Year.

Note 3.2.3.2.a.4: if there is an outstanding balance on the last day of the fourth Fiscal Year after the Fiscal Year for which the account was established (first row of this table), Article 7.3.5 applies. In the Fiscal Year a Departing Constituent Entity (or member of a JV Group) leaves the MNE Group or transfers substantially all of its assets, Article 7.3.7 applies. The amount is to be used to determine whether the Additional Current Top-up Tax is generated and the result will be presented in 3.3.3.1.

(b) Application of Article 7.3.7

Note 3.2.3.2.b: the Filing Constituent Entity shall identify all Prior Fiscal Years for which a Deemed Distribution Tax Recapture Account is outstanding and for which the ETR is re-calculated in accordance with the principles of Article 5.4.1.

Note 3.2.3.2.b.2: the incremental Top-up Tax is the total amount of Top-up Tax determined under Article 5.4.1 if Article 7.3.7 applies.

Note 3.2.3.2.b.3: the Disposition Recapture Ratio is defined in Article 7.3.8 and determined for each Departing Constituent Entity (member of JV Group) using the following formula: *GloBE Income of the CE (or member of JV Group)/Net Income of the jurisdiction*.

3.2.4. Constituent Entity Computations

Functioning of this section – Constituent Entity Computations

This section contains entity level information supporting the computation of the ETR and the Top-up Tax. Section 3.2.4.1 provides a breakdown of all the adjustments made to the FANIL of each Constituent Entity or member of JV a Group, as well as cross-border adjustments and adjustments made in cases where the UPE either is a Flow-through Entity or it is subject to a Deductible Dividend Regime. Section 3.2.4.2 includes information on adjustments made to the current tax expense of each Constituent Entity and member of JV Groups located in a jurisdiction, as well as information on the cross-allocation of Covered Taxes from one Constituent Entity (or member of a JV Group) to another Constituent Entity (or member of JV Group). Section 3.2.4.3 includes information on the elections that apply to a single Constituent Entity (or member of a JV Group). Section 3.2.4.4 contains details on income that is excluded from the application of the GloBE Rules either under Article 3.3 (i.e. International Shipping Income exclusion). Finally, Section 3.2.4.5 provides information on the accounting standard used in specific cases.

(a) Election for the transitional simplified jurisdictional reporting framework

Note 3.2.4.a.1: the Filing Constituent Entity shall report “Yes” if it elects to apply the transitional simplified jurisdictional reporting framework during the transitional period. If the Filing Constituent Entity elects for the transitional simplified jurisdictional reporting framework, it shall:

- i Complete section 3.2.4 for Constituent Entities or members of JV Groups located in this jurisdiction (and part of subgroup, where relevant) if Top-up Tax liability arises in respect of this jurisdiction and needs to be allocated on a Constituent Entity by Constituent Entity basis (see exceptions where Top-up Tax does not need to be allocated provided in note 3.4.1); and
- ii In any case, report specific information included in the tables below as provided in the explanatory guidance (see note 3.2.4.1.a.3.e, 3.2.4.1.a.3.m, 3.2.4.1.a.3.u, 3.2.4.1.a.3.v and 3.2.4.1.a.3.z, note 3.2.4.1.c, note 3.2.4.1.d, note 3.2.4.2.c.3.m, note 3.2.4.2.c.3.p, note 3.2.4.3, note 3.2.4.4.a and Note 3.2.4.4.b) for Constituent Entities or members of JV Groups located in this jurisdiction (and part of subgroup, where relevant);
- iii Report the net amount of the adjustments identified in tables 3.2.4.1.a and 3.2.4.2.c. If the net amount for the relevant adjustment is a positive amount, the Filing Constituent Entity shall report it in the “additions”. If the net amount for the relevant adjustment is a negative amount, the Filing Constituent Entity shall report it in the “reductions”.

The transitional simplified jurisdictional reporting framework shall not be elected in respect of a QDMTT Safe Harbour if the QDMTT jurisdiction chose to not apply the transitional simplified jurisdictional reporting framework as provided in the QDMTT Safe Harbour guidance.

(b) Aggregated Reporting for Tax Consolidated Groups

Note 3.2.4.b: the Filing Constituent Entity may elect for aggregate reporting for tax consolidated groups (i.e., treat a tax consolidated group as a single CE for purposes of section 3.2.4) where all the following conditions are met: (i) the taxable profits and losses of the consolidated Entities are aggregated for purposes of computing a single tax liability (irrespective of the fact that the consolidated entities might be jointly and severally liable for the tax charge on behalf of the group); (ii) all consolidated Entities are wholly-owned by the consolidating Entity; (iii) all Constituent Entities or members of a JV Group within the tax consolidated group are located in the same jurisdiction for GloBE purposes; and (iv) the Filing Constituent

Entity made an election under Article 3.2.8 of the GloBE Rules to consolidate intra-group transactions in the jurisdiction. Section 3.2.4 shall be completed on a CE-by-CE basis with respect to Entities that either joined or left the MNE Group during the Reporting Fiscal Year, irrespective of whether those Entities are (or were) included in a tax consolidation group. Equally, Section 3.2.4 shall be completed on a CE-by-CE basis with respect to Entities that are subject to separate ETR computations under the GloBE Model Rules (e.g., Investment Entities and Insurance Investment Entities), irrespective of whether those Entities are included in a tax consolidated group.

Note 3.2.4.b.1: the Filing Constituent Entity shall report the TIN of the tax consolidated group used for purposes of Covered Taxes in the jurisdiction.

Note 3.2.4.b.2: the Filing Constituent Entity shall report the TIN of the Constituent Entities or members of a JV Group that are aggregated in the tax consolidated group used for purposes of Covered Taxes in the jurisdiction.

3.2.4.1 GloBE Income or Loss

(a) Adjustments to the Financial Accounts Net Income or Loss

Note 3.2.4.1.a: when the UPE is wholly owned by holders of Ownership Interests in respect of which Article 7.1 applies, and the Filing CE reported “exception, wholly-owned” in column 3.2.4.1.d.5, the Filing CE shall not complete Table 3.2.4.1.a with respect to the UPE (and with respect to Tax Transparent Entities wholly owned by the UPE through a Tax Transparent Structure and located in the UPE jurisdiction to which Article 3.5.1(b) applies).

Note 3.2.4.1.a.1: the Filing Constituent Entity shall report the TIN of the Constituent Entity, JV or JV Subsidiary used for purposes of Covered Taxes in the jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 3.2.4.1.a.2: the Filing Constituent Entity shall report the FANIL of the Constituent Entity or member of a JV Group after the allocation of GloBE Income or Loss between Main Entities and Permanent Establishments (Article 3.4) and the allocation of GloBE Income or Loss from Flow-through Entities (Article 3.5). Article 3.5 also covers the allocation of GloBE Income or Loss from an Investment Entity or an Insurance Investment Entity that is treated as a Tax Transparent Entity as a result of the election under Article 7.5.

Note 3.2.4.1.a.3.e, 3.2.4.1.a.3.m, 3.2.4.1.a.3.u 3.2.4.1.a.3.v and 3.2.4.1.a.3.z: the Filing Constituent Entity shall complete these rows irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.

Note 3.2.4.1.a.3.n: the Filing Constituent Entity shall report the adjustments made to the Financial Accounting Net Income or Loss pursuant to Article 3.2.4. In particular, any amount that is recorded as a reduction in current income tax expense (or other Covered Taxes) in the financial accounts and that should be treated as income, is included as a positive adjustment and any amount that is recorded as income in the financial accounts and that should be treated as a reduction in current income tax expense (or other Covered Taxes), is included as a negative adjustment.

Note 3.2.4.1.a.4: the Filing Constituent Entity shall report the GloBE Income (Loss) of the Constituent Entity or member of a JV Group. For Investment Entities, the Filing Constituent Entity shall report the MNE Group’s Allocable Share of the Investment Entity’s GloBE Income as determined under Article 7.4.4.

(b) Cross-border allocation of income or loss between a Main Entity and a PE and from an FTE (Articles 3.4 and 3.5)

Note 3.2.4.1.b: no adjustments are required under Article 3.4 if, by virtue of maintaining its own (separate) financial accounts in the jurisdiction, the FANIL of the CE (or members of JV Groups) located in the jurisdiction already reflects income or losses attributable to Permanent Establishments in such jurisdiction. Adjustments under Article 3.5 apply to Flow-Through Entities as well as Constituent Entities or members of JV Groups in respect of which an election is made under Article 7.5.

Note 3.2.4.1.b: the Filing CE shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.

Note 3.2.4.1.b.1: the Filing Constituent Entity shall report the TIN of the Constituent Entity, JV or JV Subsidiary used for purposes of Covered Taxes in the jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 3.2.4.1.b.2: the FANIL of the CE or member of JV Group before the relevant adjustment shall be reported under this column. In the case where multiple adjustments apply, the FANIL to be reported under 3.2.4.1.b.2 should reflect the FANIL taking into account the preceding adjustment(s).

Note 3.2.4.1.b.3: the Filing Constituent Entity shall identify the relevant adjustment from the following list: Article 3.4, Article 3.5.3, Article 3.5.1(a) and/or Article 3.5.1(b). For each type of adjustment, the respective addition or reduction to FANIL of the Constituent Entity or member of JV Group shall be reported. In the case where multiple adjustments apply, one row shall be reported for each option and the relevant options shall be reported in the following order: Article 3.4, Article 3.5.3, Article 3.5.1(a) and/or Article 3.5.1(b).

- The adjustments under Article 3.4 shall include the adjustments made to allocate GloBE Income or Loss to PEs located in this jurisdiction or Stateless PEs (additions) as well as to allocate GloBE Income or Loss from a Main Entity located in this jurisdiction to a PE (reductions). The adjustments related to Article 3.4 should not include the allocation of GloBE Income or Loss to a Permanent Establishment of a Flow-Through Entity.
- The adjustments under Article 3.5.3 shall include the reductions to the GloBE Income or Loss of the amount allocated to other owners that are not Group Entities.
- The adjustments under Article 3.5.1(a) shall include the allocation of GloBE Income or Loss from a Flow-through Entity to a PE in this jurisdiction or to this Stateless PE (additions) and the allocation from this Stateless Flow-through Entity (or a Flow-through Entity located in this jurisdiction if it is the UPE) to a PE in another jurisdiction (reductions).
- The adjustments under Article 3.5.1(b) shall include the allocation of GloBE Income or Loss from a Tax Transparent Entity that is not the UPE to a CE-owner in this jurisdiction (additions) and the allocation from a Tax Transparent Entity that is not the UPE to a CE owner in another jurisdiction (reductions).
- When a Flow-through Entity is treated as a Tax Transparent Entity by some of its owners and a Reverse Hybrid Entity by its other owners, the Filing Constituent Entity shall report under Article 3.5.1 (b) the allocation of GloBE Income or Loss to CE owners that are located in a jurisdiction where the Flow-through Entity is treated as fiscally transparent. The GloBE Income or Loss attributable to Ownership Interests held by CE owners that are located in a jurisdiction where the Flow-through Entity is not treated as fiscally transparent is then allocated to the Flow-through Entity under Article 3.5.1 (c).

Note 3.2.4.1.b.4: the Filing Constituent Entity shall report the TIN of the other Constituent Entity, JV or JV Subsidiary used for purposes of Covered Taxes in the jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 3.2.4.1.b.5: the Filing Constituent Entity shall identify the jurisdiction (in the form of a 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard) of the other Constituent Entity or member of JV Group. The Filing Constituent Entity shall report “Stateless” for Stateless Constituent Entities.

Note 3.2.4.1.b.6: the amount of any adjustment that increases the GloBE Income of the CE or member of JV Group identified in column 3.2.4.1.b.1 shall be reported under this column.

Note 3.2.4.1.b.7: the amount of any adjustment that decreases the GloBE Income of the CE or member of JV Group identified in column 3.2.4.1.b.1 shall be reported under this column.

Note 3.2.4.1.b.8: the FANIL of the CE or member of JV Group after the relevant adjustment shall be reported under this column. In the case where multiple adjustments apply, the FANIL to be reported under 3.2.4.1.b.2 should reflect the FANIL taking into account the adjustment identified in the same row.

(c) Cross-border adjustments

Note 3.2.4.1.c: when the UPE is wholly owned by holders of Ownership Interests in respect of which Article 7.1 applies, and the Filing Constituent Entity reported “exception, wholly-owned” in column 3.2.4.1.d.5, the Filing Constituent Entity shall not complete Table 3.2.4.1.c with respect to the UPE (and with respect to Tax Transparent Entities wholly owned by the UPE through a Tax Transparent Structure and located in the UPE jurisdiction to which Article 3.5.1(b) applies).

Note 3.2.4.1.c: the Filing Constituent Entity shall only report in this table adjustments under Article 3.2.3 that relate to transactions between Constituent Entities located in different jurisdictions. The Filing Constituent Entity shall not report the cross-border adjustments under Article 3.2.3 when they relate to intragroup transactions that do not exceed EUR 35 million in aggregate during the Reporting Fiscal Year. The Filing CE shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.

Note 3.2.4.1.c.1: the Filing Constituent Entity shall report the TIN of the Constituent Entity or member of JV Group located in this jurisdiction (or Stateless CE where relevant) for which an adjustment applies. Where a TIN is unavailable, the Filing Constituent Entity shall report a functional equivalent, such as a business/company registration code/number.

Note 3.2.4.1.c.2: the Filing Constituent Entity shall identify whether the adjustment relates to Article 3.2.3 or 3.2.7.

Note 3.2.4.1.c.3: the Filing Constituent Entity shall report the TIN of the other CE or member of JV Group involved in the adjustment identified. Where a TIN is unavailable, the Filing Constituent Entity shall report a functional equivalent, such as a business/company registration code/number.

Note 3.2.4.1.c.4: the Filing Constituent Entity shall identify the jurisdiction (in the form of a 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard) of the other Constituent Entity or member of JV Group involved in the adjustment. The Filing Constituent Entity shall report “Stateless” for Stateless Constituent Entities.

Note 3.2.4.1.c.5: the amount of any adjustment that increases the GloBE Income of the CE or member of JV Group identified in column 3.2.4.1.c.1 shall be reported under this column.

Note 3.2.4.1.c.6: the amount of any adjustment that decreases the GloBE Income of the CE or member of JV Group identified in column 3.2.4.1.c.1 shall be reported under this column. The adjustment under Article 3.2.7 that excludes expenses will result in an addition to the GloBE Income. Therefore, column 6 is not likely to be used for purposes of those adjustments.

(d) Adjustments to the GloBE Income of the UPE under Article 7.1 or Article 7.2

Note 3.2.4.1.d: the Filing Constituent Entity shall complete this table in cases where Article 7.1 or Article 7.2 applies. The Filing CE shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.

Note 3.2.4.1.d.1: when Articles 7.1 or 7.2 apply, the CE located in this jurisdiction is the UPE of the MNE Group. In that case, the Filing Constituent Entity shall report “UPE”. If Article 7.1.4 applies, the Filing Constituent Entity shall report the TIN of the Permanent Establishments to which Article 7.1 applies or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number. If Article 7.2.3 applies, the Filing Constituent Entity shall report the TIN of the Constituent Entities to which Article 7.2 applies or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number. When Article 7.1 or 7.2 applies to a members of a JV Group, the Filing Constituent Entity shall report the TIN of the JV Group members.

Note 3.2.4.1.d.2: the Filing Constituent Entity shall report the Article (i.e. Article 7.1.1, Article 7.1.2, Article 7.2.1 or Article 7.2.2) that applies, together with the relevant subparagraph letter and number.

Note 3.2.4.1.d.3: the Filing Constituent Entity shall complete a separate row for each holder of Ownership Interests (respectively, dividend recipient) in respect of which Article 7.1.1(a) or 7.1.1(c) (respectively, 7.2.1(a) or 7.2.1(c)) applies. The Filing Constituent Entity shall identify the Natural Persons in the aggregate. The Filing Constituent Entity shall identify the holders of Ownership Interests (respectively, dividend recipients) for which a reduction of the GloBE Income applies as follows:

(a) Each holder of Ownership Interests (respectively, dividend recipient) in respect of which Article 7.1.1(a) (respectively, 7.2.1(a)) applies, is identified through the reporting of: (i) its TIN; (ii) the jurisdiction where it is a tax resident; and (iii) the nominal tax rate or the expected aggregate tax rate (percentage) applicable when comparing the aggregate amount of Adjusted Covered Taxes of the UPE and taxes of the holder of the Ownership Interest on the excluded income (respectively, the taxes paid by the dividend recipient on the dividend income) with the amount of excluded income. In the situation where multiple nominal tax rates apply to the holder of the Ownership Interest, the Filing Constituent Entity may report in (iii) the lowest nominal tax rate applicable (provided that rate exceeds 15%) instead of the nominal tax rate. If the dividend recipient is a natural person in respect of which Article 7.2.1(a)(iii) applies, the jurisdictions where the natural persons are tax resident shall be reported instead, together with the number of natural persons that are tax resident in each jurisdiction.

(b) The total number of Natural Persons in respect of which Article 7.1.1(b) (respectively, 7.2.1(b)) applies shall be reported instead of identifying such Natural Persons.

(c) Each holder of Ownership Interests (respectively, dividend recipient) in respect of which Article 7.1.1(c) (respectively, 7.2.1(c)) applies, is identified through the reporting of: (i) its TIN (or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number); and (ii) the type of Entity (Governmental Entity, International Organisation, Non-profit Organisation, Pension Fund or, for purposes of Article 7.2.1 (c), Pension Fund that is not a Pension Services Entity).

Note 3.2.4.1.d.4: the Filing Constituent Entity shall report (in percentage) the Ownership Interests directly held in the UPE by each holder identified in 3.2.4.1.d.3.

Note 3.2.4.1.d.5: the amount of any adjustment that decreases the GloBE Income of the CE or member of JV Group identified in column 3.2.4.1.d.1 shall be reported under this column. If Article 7.1 applies, the Filing Constituent Entity shall report the GloBE Income or (Loss) attributable to each Ownership Interest in 3.2.4.1.d.4. If Article 7.2 applies, the Filing Constituent Entity shall report the amount of Deductible Dividends distributed to each shareholder (i.e., dividend recipient) identified in 3.2.4.1.d.3. When the UPE is wholly owned by holders of Ownership Interests (identified in column 3.2.4.1.d.3) in respect of which Article 7.1 applies, the Filing Constituent Entity shall only report “exception, wholly-owned” in this column (and shall not report the amount of any adjustment). The same exception could apply in respect of Tax

Transparent Entities wholly owned by the UPE through a Tax Transparent Structure and located in the UPE jurisdiction to which Article 3.5.1(b) applies.

3.2.4.2 Adjusted Covered taxes

(a) Adjustments to the Current tax expense in the Financial Accounts

Note 3.2.4.2.a: when the UPE is wholly owned by holders of Ownership Interests in respect of which Article 7.1 applies, and the Filing Constituent Entity reported “exception, wholly-owned” in column 3.2.4.1.d.5, the Filing CE shall not complete Table 3.2.4.2.a with respect to the UPE (and with respect to Tax Transparent Entities wholly owned by the UPE through a Tax Transparent Structure and located in the UPE jurisdiction to which Article 3.5.1(b) applies).

Note 3.2.4.2.a.1: the Filing Constituent Entity shall report the TIN of the Constituent Entity or member of JV Group used for purposes of Covered Taxes in the jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 3.2.4.2.a.2: the Filing Constituent Entity shall report the current tax expense (with respect to Covered Taxes accrued in Financial Accounting Net Income or Loss of the Constituent Entity or member of a JV Group) after the allocation of Covered Taxes from one Constituent Entity or member of JV Group to another Constituent Entity or member of JV Group (Article 4.3). Article 4.3 also covers the allocation of Covered Taxes from an Investment Entity or an Insurance Investment Entity that is treated as a Tax Transparent Entity as a result of the election under Article 7.5. Post-filing adjustments identified in this table do not include the adjustments made for a Fiscal Year other than the Reporting Fiscal Year in accordance with an ETR Adjustment Article. The post-filing adjustments related to Article 4.6.1 are the adjustments resulting in a material decrease in Covered Taxes for a previous Fiscal Year and the adjustments resulting in an immaterial decrease when an election is not made under Article 4.6.1.

Note 3.2.4.2.a.3.c: the Filing Constituent Entity shall report the amount of the adjustment made pursuant to Article 4.1.2(d) in respect of a Qualified Refundable Tax Credit or Marketable Tax Credit that is recorded as a reduction in current income tax expense (or other Covered Taxes) in the financial accounts.

Note 3.2.4.2.a.3.f: the Filing Constituent Entity shall report the amount of the adjustment made pursuant to Article 4.1.3(b) in respect of a non-Qualified Refundable Tax Credit, non-Marketable Transferable Tax Credit or Other Tax Credit that is recorded as income and not as a reduction in current income tax expense (or other Covered Taxes) in the financial accounts.

Note 3.2.4.2.a.3.g: pursuant to Article 4.1.3(c), the Filing Constituent Entity shall report the amount of Covered Taxes which were claimed as Covered Tax in a previous fiscal year (subject to GloBE rules) and that is refunded or credited in the current fiscal year. Qualified Refundable Tax Credits and Marketable Transferable Tax Credits are excluded from the scope of application of this rule.

Note 3.2.4.2.a.3.n: the Filing Constituent Entity shall only complete this row when Articles 7.3.7 and 7.3.8 apply.

Note 3.2.4.2.a.3.p: Total Deferred Tax Adjustment Amount should not include any deferred tax expense arising in the jurisdiction of the Permanent Establishment with respect to losses for which the GloBE Loss of a Permanent Establishment is treated as an expense of the Main Entity pursuant to Article 3.4.5.

Note 3.2.4.2.a.4: the Filing Constituent Entity shall report the Adjusted Covered Taxes of the Constituent Entity or member of a JV Group. For Investment Entities, the Filing Constituent Entity shall report the Investment Entity’s Adjusted Covered Taxes as determined under Article 7.4.3.

(b) Cross allocation of taxes

Note 3.2.4.2.b: the Filing Constituent Entity shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework. When the GIR is filed for QDMTT purposes, the Filing Constituent Entity shall not report the Covered Tax expense of: (i) a Constituent Entity-owner under a CFC Tax Regime that is allocable to a domestic Constituent Entity under Article 4.3.2(c) of the GloBE Rules; (ii) a Main Entity that is allocable under Article 4.3.2(a) of the GloBE Rules to a Permanent Establishment located in the jurisdiction; (iii) a Constituent Entity-owner on income of a Hybrid Entity or a Reverse Hybrid Entity that is allocable under Article 4.3.2(d) to a Hybrid Entity or Reverse Hybrid Entity that is either located in the jurisdiction or is included in the scope of the QDMTT because the QDMTT applies to stateless Flow-through Entities created in the QDMTT jurisdiction; and (iv) a Constituent Entity-owner (e.g. net basis taxes), other than a withholding tax imposed by the QDMTT jurisdiction, that is allocable to a distributing Constituent Entity located in the jurisdiction under Article 4.3.2 (e) of the GloBE Rules. However, the Filing Constituent Entity shall report those amounts with respect to the Covered Tax Expense that is included in the financial accounts of a Constituent Entity-owner or Main Entity located in the QDMTT jurisdiction and for which an adjustment has to be made.

Note 3.2.4.2.b.1: the Filing Constituent Entity shall report the TIN of the Constituent Entity (or member of JV Group) or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 3.2.4.2.b.2: the Filing Constituent Entity shall report the Covered Taxes of the Constituent Entity (or member of JV Group) before the adjustment.

Note 3.2.4.2.b.3: the Filing Constituent Entity shall identify the relevant subparagraph of Article 4.3.2, Article 4.3.3 or Article 4.3.4 that applies. The Filing Constituent Entity shall identify separately the allocation results from the application of a Blended CFC regime by reporting “4.3.2(c) – Blended CFC regime”. When Article 4.3.2.c or Article 4.3.2.d applies, for purpose of columns 3.2.4.2.b.6 and 3.2.4.2.b.7, the Filing Constituent Entity shall complete a first row with the amount before the adjustment under Article 4.3.3 (indicating the relevant subparagraph of Article 4.3.2 in column 3.2.4.2.b.3) and a second row with the amount after the adjustment under Article 4.3.3 (indicating the relevant subparagraph of Article 4.3.3 in column 3.2.4.2.b.3, as well as the relevant subparagraph of Article 4.3.2).

Note 3.2.4.2.b.4: the Filing Constituent Entity shall report the TIN of the other Constituent Entity (or member of JV Group) or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 3.2.4.2.b.5: for allocation of Covered Tax from a Constituent Entity (or member of JV Group) to another Constituent Entity (or member of JV Group), the Filing Constituent Entity shall identify the jurisdiction (in the form of a 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard) of the other Constituent Entity (or member of JV Group). If the other Constituent Entity is a Stateless Constituent Entity, the Filing Constituent Entity shall report “Stateless”.

Note 3.2.4.2.b.6: the Filing Constituent Entity shall report the additions to Covered Taxes of the Constituent Entity (or member of JV Group) identified in column 3.2.4.2.b.1. The cross-allocation of taxes covers both current tax expense and deferred tax expense.

Note 3.2.4.2.b.7: the Filing Constituent Entity shall report the reductions to Covered Taxes of the Constituent Entity (or member of JV Group) identified in column 3.2.4.2.b.1. The cross-allocation of taxes covers both current tax expense and deferred tax expense.

(c) Deferred tax expense

Note 3.2.4.2.c: when the UPE is wholly owned by holders of Ownership Interests in respect of which Article 7.1 applies, and the Filing Constituent Entity reported “exception, wholly-owned” in column 3.2.4.1.d.5, the Filing CE shall not complete Table 3.2.4.2.c with respect to the UPE (and with respect to Tax Transparent

Entities wholly owned by the UPE through a Tax Transparent Structure and located in the UPE jurisdiction to which Article 3.5.1(b) applies).

Note 3.2.4.2.c.1: the Filing Constituent Entity shall report the TIN of the Constituent Entity (or member of JV Group) or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 3.2.4.2.c.2: the Filing Constituent Entity shall report the Deferred tax expense amount for GloBE purposes for the Constituent Entity (or member of JV Group) before any recasting and adjustments. In case there is a divergence between the carrying value of an asset or liability for financial accounting and GloBE purposes, the portion of the deferred tax expense must be calculated on the basis of the GloBE carrying value pursuant to the related Administrative Guidance. If the deferred tax expense is taken into account as a debit to the deferred tax expense account, the amount shall be presented as a positive number. If the deferred tax expense is taken into account as credit to the deferred tax expense account, the amount shall be presented as a negative amount.

Note 3.2.4.2.c.3: the Filing Constituent Entity shall report the amount of each adjustment to the Constituent Entity (or member of JV Group)'s Deferred tax expense before any recasting. If the adjustment leads to an increase to the Total Deferred Tax Adjustment Amount, the amount shall be presented as an addition. If the adjustment leads to a decrease to the Total Deferred Tax Adjustment Amount, the amount shall be presented as a reduction.

Note 3.2.4.2.c.3.m and 3.2.4.2.c.3.p: the Filing CE shall complete these rows irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.

Note 3.2.4.2.c.4: the Filing Constituent Entity shall recast at the Minimum Rate any deferred tax asset attributable to a GloBE Loss (Article 4.4.3) that was recorded at a lower tax rate and report the amount of the difference between the deferred tax expense recorded at a lower tax rate than the Minimum Rate and the deferred tax expense based on the Minimum Rate. The difference shall be presented as a reduction when it is attributable to the recognition of a GloBE Loss deferred tax asset, and the difference shall be presented as an addition when it is attributable to the reversal of such deferred tax asset.

Note 3.2.4.2.c.5: the Filing Constituent Entity shall recast at the Minimum Rate any deferred tax expense that has been recorded at a higher tax rate than the Minimum Rate and report the amount of the difference between the deferred tax expense recorded at a higher tax rate than the Minimum Rate and the deferred tax expense based on the Minimum Rate. If the deferred tax expense for the Fiscal Year before any recasting is taken into account as a credit to the deferred tax expense account, the amount of the difference shall be presented as an addition. If the deferred tax expense before any recasting for the Fiscal Year is taken into account as a debit to the deferred tax expense account, the amount of the difference shall be presented as a reduction.

Note 3.2.4.2.c.6: the Filing Constituent Entity shall report the Total Deferred Tax Adjustment Amount for the Constituent Entity (or member of JV Group).

3.2.4.3 Constituent Entity elections (or elections that apply to a JV Group)

Note 3.2.4.3: The Filing Constituent Entity shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.

Note 3.2.4.3.4: for Five-year Elections, the Filing Constituent Entity shall report the Election Year.

Note 3.2.4.3.5: for Five-year Elections, the Filing Constituent Entity shall report the year where the election was revoked (if any). The Filing Constituent Entity shall report the revocation year in the GloBE Information Return filed for the revocation year and in the GloBE Information Returns filed for the four Fiscal Years succeeding the revocation year.

Note 3.2.4.3.c: the Filing Constituent Entity can make an Unclaimed Accrual Annual Election with respect to DTLs that it expects will reverse in more than five years after accrual.

Note 3.2.4.3.i: the Filing Constituent Entity can make an Unclaimed Accrual Five-Year Election with respect to a DTL for a GL account or an Aggregated DTL Category irrespective of any expectations about the reversal time period of such DTLs.

Note 3.2.4.3.j: the Filing Constituent Entity can make a GloBE Loss Election under Article 4.5.6 with respect to a Flow-through Entity that is the UPE. An election under Article 4.5.6 is independent of the GloBE Loss Election made for any jurisdiction in row 3.2.3.1.a.5.i. Other Entities are not aggregated with the Flow-through Entity that is a UPE for purposes of calculating the GloBE Loss even if a GloBE Loss Election has been made under Article 4.5.1 for the jurisdiction in which the UPE is located.

Note 3.2.4.3.k.1: the Filing Constituent Entity shall report the Constituent Entities (or members of JV Groups) for which the election under Article 6.3.4 applies.

Note 3.2.4.3.k.2: the Filing Constituent Entity shall report the Fiscal Year of the event that triggered the tax adjustment (i.e. triggering event).

Note 3.2.4.3.k.3: the Filing Constituent Entity shall report (i) if the net of the total amounts determined under Article 6.3.4 (a) is included in the computation of the GloBE Income or Loss in the Fiscal Year in which the triggering event occurs. The Filing Constituent Entity shall report (ii) if the amount equal to the net total of the amounts divided by five is included in the computation of the GloBE Income or Loss in the Fiscal Year in which the triggering event occurs and in each of the immediate four subsequent Fiscal Years.

3.2.4.4 International shipping income exclusion

Functioning of this section – International shipping income exclusion

The Filing Constituent Entity shall provide details on income that is excluded from the application of the GloBE Rules under Article 3.3 (i.e. International Shipping Income exclusion).

Tables 3.2.4.4 (a) and (b) require the Filing Constituent Entity F detailed information on the computation of International Shipping Income and Qualified Ancillary International Shipping Income, including associated costs and Covered Taxes.

(a) International shipping income exclusion

Note 3.2.4.4.a: the Filing Constituent Entity shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.

Note 3.2.4.4.a.1: the Filing Constituent Entity shall report the TIN (or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number) of the Constituent Entity, or the member of a JV Group to which the International Shipping Income or Qualified Ancillary International Shipping Income exclusion applies.

Note 3.2.4.4.a.2: the Filing Constituent Entity shall report all of the relevant activities specified in subparagraphs (a) through (f) of Article 3.3.2 in respect of which International Shipping Income was obtained (several options can apply).

Note 3.2.4.4.a.3-5: the Filing Constituent Entity shall report the aggregate revenue derived from and costs attributable to all relevant activities specified in subparagraphs (a) through (f) of Article 3.3.2, as well as the aggregate International Shipping Income of the Constituent Entity.

Note 3.2.4.4.a.6: the filing Constituent Entity shall report all of the relevant activities specified in subparagraphs (a) through (f) of Article 3.3.2 in respect of which Qualified Ancillary Shipping Income was obtained (several options can apply).

Note 3.2.4.4.a.7-9: the Filing Constituent Entity shall report the aggregate revenue derived from and costs attributable to each relevant activity specified in subparagraphs (a) through (e) of Article 3.3.3, as well as the aggregate Qualified Ancillary International Shipping Income of the Constituent Entity (or member of JV Group).

Note 3.2.4.4.a.10: the Filing Constituent Entity shall report the payroll costs attributable to International Shipping Income or Qualified Ancillary International Shipping Income.

Note 3.2.4.4.a.11: the Filing Constituent Entity shall report the carrying value of tangible assets used in the generation of International Shipping Income or Qualified Ancillary International Shipping Income (other than attributable to excess income over the cap for Qualified Ancillary International Shipping Income).

Note 3.2.4.4.a.12: the Filing Constituent Entity shall report any Covered Taxes associated with the excluded International Shipping Income or Qualified Ancillary International Shipping Income.

(b) Jurisdictional cap for the qualified ancillary international shipping income exclusion

Note 3.2.4.4.b: the Filing Constituent Entity shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.

Note 3.2.4.4.b.1: the Filing Constituent Entity shall report the total International Shipping Income for the CEs or members of JV Group of the relevant subgroup identified in Section 3.1.3 and located in the jurisdiction.

Note 3.2.4.4.b.2: the Filing Constituent Entity shall report the amount of the 50% cap.

Note 3.2.4.4.b.3: the Filing Constituent Entity shall report the total Qualified Ancillary International Shipping Income for all CEs or members of JV Group of the relevant subgroup identified in Section 3.1.3 and located in the jurisdiction.

Note 3.2.4.4.b.4: the Filing Constituent Entity shall report the excess of the cap if the Total Qualified Ancillary International Shipping Income for all CEs or members of JV Group of the relevant subgroup identified in Section 3.1.3 exceeds 50% of the Total International Shipping Income for all CEs or members of JV Group of the relevant subgroup identified in Section 3.1.3, such excess income being included in the GloBE Income. To the extent that direct or indirect costs are attributable to income from qualified ancillary activities in excess of the 50% limitation under Article 3.3.4, those costs are taken into account in the computation of a CE's GloBE Income (or the GloBE Income of a member of a JV Group) because the related income is included in the computation as well. The payroll costs and the carrying value of tangible assets attributable to a Constituent Entity's excess income (or the excess income of a member of a JV Group) over the cap for the Qualified Ancillary International Shipping Income shall be included in the payroll carve-out and the tangible asset carve-out computation.

3.2.4.5 Information for purposes of Article 7.6 (if applicable)

Note 3.2.4.5.1: the Filing Constituent Entity shall report the TIN of the Constituent Entity-owner (or member of JV Group) for which the election under Article 7.6 applies.

Note 3.2.4.5.2: the Filing Constituent Entity shall report the TIN of the Investment Entity in which the Constituent Entity-owner (or member of JV Group) has an Ownership Interest and for which the election under Article 7.6 is made.

Note 3.2.4.5.3: the Filing Constituent Entity shall report the amount of distributions and deemed distributions of the Investment Entity's GloBE Income received by the Constituent Entity-owner.

Note 3.2.4.5.4: the Filing Constituent Entity shall report the Local Creditable Tax Gross-up incurred by the Investment Entity that is allowed as a credit against the Constituent Entity-owner's tax liability arising in connection with a distribution from the Investment Entity.

Note 3.2.4.5.5: if the Investment Entity has an Undistributed Net GloBE Income for the Tested Year, the Filing Constituent Entity shall report the Constituent Entity-owner's proportionate share of the Investment Entity's Undistributed Net GloBE Income for the Tested Year.

3.2.4.6 Other Accounting Standard

Note 3.2.4.6.1: the Filing Constituent Entity shall report: (i) the Constituent Entities located in the jurisdiction for which the Financial Accounting Net Income or Loss is based on an Acceptable Financial Accounting Standard or an Authorised Financial Accounting Standard other than the accounting standard used for the Consolidated Financial Statements of the UPE as provided under Article 3.1.3; (ii) the JV Subsidiaries located in the jurisdiction for which the Financial Accounting Net Income or Loss is based on an Acceptable Financial Accounting Standard or an Authorised Financial Accounting Standard other than the accounting standard used for the Consolidated Financial Statements of the Joint Venture as provided under Article 3.1.3; and (iii) the Joint Venture located in the jurisdiction for which the Financial Accounting Net Income or Loss is based on an Acceptable Financial Accounting Standard or an Authorised Financial Accounting Standard other than the accounting standard used for the Consolidated Financial Statements of the UPE as a result of Article 6.4.1(a).

Note 3.2.4.6.2: the Filing Constituent Entity shall report the Acceptable Financial Accounting Standard or the Authorised Financial Accounting Standard that is used for the computation of the Financial Accounting Net Income or Loss of the Constituent Entity, Joint Venture or JV Subsidiary.

3.3. Top-up Tax computation

Functioning of this section - Top-up Tax computation

Section 3.3 provides information to support the Top-up Tax computation made by the MNE Group. This includes information on Top-up Tax calculation, the computation of Substance-based Income Exclusion, Additional Current Top-up Tax, and information on QDMTT.

3.3.1. Top-up Tax

Note 3.2.1.a: the Filing Constituent Entity shall report the Top-up Tax Percentage for the jurisdiction.

Note 3.2.1.b: the Filing Constituent Entity shall report the Substance-based Income Exclusion for the jurisdiction.

Note 3.2.1.c: the Filing Constituent Entity shall report the Excess Profit for the jurisdiction.

Note 3.2.1.d: the Filing Constituent Entity shall report the Additional Current Top-up Tax for the jurisdiction.

Note 3.2.1.e: the Filing Constituent Entity shall report the QDMTT payable in the jurisdiction.

Note 3.2.1.f: the Filing Constituent Entity shall report the Jurisdictional Top-up Tax.

3.3.2. Computation of Substance-based Income Exclusion (if applicable)

3.3.2.1 Total amount of the Substance Based Income Exclusion

Note 3.3.2.1: if the Filing Constituent Entity does not complete the table for the jurisdiction, it is assumed that the election to not apply the Substance Based Income Exclusion in 3.2.3.1.a.1.c has been made.

Note 3.3.2.1.1: the relevant Eligible Payroll Costs of Eligible Employees performing activities in the jurisdiction shall not include payroll costs that are: (i) capitalised and included in the carrying value of Eligible Tangible Assets; or (ii) attributable to a Constituent Entity's International Shipping Income and Qualified Ancillary International Shipping Income. Where the employee undertakes 50% or less of their activities for the MNE Group during the Reporting Fiscal Year within the jurisdiction of the employer, the relevant Eligible Payroll Costs of Eligible Employees shall only take into account the proportion of the payroll costs attributable to the employee's working time spent within the jurisdiction of the employer pursuant to the related Administrative Guidance. The relevant Eligible Payroll Costs of Eligible Employees shall not include an amount of Eligible Payroll Cost attributable to the income excluded from the GloBE Income of the Ultimate Parent Entity under Article 7.2.1 pursuant to the related Administrative Guidance.

Note 3.3.2.1.1: when an Entity becomes or ceases to be a Constituent Entity of an MNE Group as a result of a transfer of direct or indirect Ownership Interests in such Entity, the computation of the target's Eligible Payroll Costs shall take into account only those costs reflected in the Consolidated Financial Statements of the Ultimate Parent Entity as provided under Article 6.2.1(d).

Note 3.3.2.1.2: the Filing Constituent Entity shall report the application of the relevant mark-up percentage for the Reporting Fiscal Year.

Note 3.3.2.1.3: the carrying value of relevant Eligible Tangible Assets located in the jurisdiction shall not include: (i) the carrying value of property (including land or buildings) that is held for sale, finance lease or investment; and (ii) the carrying value of tangible assets used in the generation of the Constituent Entity's International Shipping Income and Qualified Ancillary International Shipping Income. Where the tangible asset is located within the jurisdiction of its owner (or lessee, if applicable) 50% or less of the time during the Reporting Fiscal Year, the carrying value of relevant Eligible Tangible Assets shall only take into account the carrying value of the asset attributable to the time the asset was located within the jurisdiction of the owner (respectively the lessee, if applicable) pursuant to the related Administrative Guidance. The carrying value of relevant Eligible Tangible Assets shall not include the carrying value of Eligible Tangible Assets proportionately attributable to the income excluded from the GloBE Income of the Ultimate Parent Entity under Article 7.2.1 pursuant to the related Administrative Guidance.

Note 3.3.2.1.3: when an Entity becomes or ceases to be a Constituent Entity of an MNE Group as a result of a transfer of direct or indirect Ownership Interests in such Entity, the computation of carrying value of the target's Eligible Tangible Assets shall be adjusted proportionally to correspond with the length of the relevant Fiscal Year that the target was a member of the MNE Group as provided under Article 6.2.1(e).

Note 3.3.2.1.4: the Filing Constituent Entity shall report the application of the relevant mark-up percentage for the Reporting Fiscal Year.

Note 3.3.2.1.5: the Filing Constituent Entity shall report the Substance-based Income Exclusion for the jurisdiction.

3.3.2.2 Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets to Permanent Establishments for purposes of the Substance Based Income Exclusion

Note 3.3.2.2.1: the Filing Constituent Entity shall report the aggregate Relevant Eligible Payroll Costs for all Main Entities located in the jurisdiction before any adjustment under Article 5.3.6 (i.e. allocation to Permanent Establishments).

Note 3.3.2.2.2: the Filing Constituent Entity shall report the aggregate carrying value of the Relevant Eligible Tangible Assets for all Main Entities located in the jurisdiction before any adjustment under Article 5.3.6 (i.e. allocation to Permanent Establishments).

Note 3.3.2.2.3: the Filing Constituent Entity shall identify the jurisdiction (in the form of a 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard) where the Permanent Establishments are located for GloBE purposes. The Filing Constituent Entity shall complete a separate row for each jurisdiction where Permanent Establishments that are allocated Eligible Payroll Costs and carrying value of Eligible Tangible Assets under Article 5.3.6 are located. The Filing Constituent Entity shall report “Stateless” if the Permanent Establishment is Stateless for GloBE purposes.

Note 3.3.2.2.4: the Filing Constituent Entity shall report the aggregate relevant Eligible Payroll Costs allocated to Permanent Establishments located in each jurisdiction identified in the 3.3.2.2.3 column under Article 5.3.6. Eligible Payroll Costs of Constituent Entities or members of JV Groups whose income has been wholly or partly excluded in accordance with Article 3.5.3 or Article 7.1.4 are excluded from the Substance-based Income Exclusion computations in the same proportion.

Note 3.3.2.2.5: the Filing Constituent Entity shall report the aggregate carrying value of the relevant Eligible Tangible Assets allocated to Permanent Establishments located in each jurisdiction identified in the 3.3.2.2.3 column under Article 5.3.6. The carrying value of Eligible Tangible Assets of Constituent Entities or members of JV Groups whose income has been wholly or partly excluded in accordance with Article 3.5.3 or Article 7.1.4 are excluded from the Substance-based Income Exclusion computations in the same proportion.

Note 3.3.2.2.4 and 3.3.2.2.5: the Eligible Payroll Costs and Eligible Tangible Assets of a Permanent Establishment are not taken into account for the Eligible Payroll Costs and Eligible Tangible Assets of the Main Entity (i.e. the Eligible Payroll Costs and Eligible Tangible Assets of the Main Entity are reduced, respectively, by the Eligible Payroll Costs and Eligible Tangible Assets allocated to its Permanent Establishments).

3.3.2.3 Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets of a Flow-through Entity for purposes of the Substance Based Income Exclusion

Note 3.3.2.3.1: the Filing Constituent Entity shall report the aggregate relevant Eligible Payroll Costs for all Flow-through Entities located in the jurisdiction after any adjustments under Article 5.3.6 and before any adjustments under Article 5.3.7.

Note 3.3.2.3.2: the Filing Constituent Entity shall report the aggregate carrying value of the relevant Eligible Tangible Assets for all Flow-through Entities located in the jurisdiction after any adjustments under Article 5.3.6 and before any adjustments under Article 5.3.7.

Note 3.3.2.3.3: if Article 5.3.7 (a) applies, the Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction where the Constituent Entity-owners (or members of JV Group) are located for GloBE purposes. The Filing Constituent Entity shall report “Stateless” for each Stateless Constituent Entity-owner. The Filing Constituent Entity shall complete a separate row for each jurisdiction where Constituent Entity-owners (or members of JV Group) that are attributed Eligible Payroll Costs and Eligible Tangible Assets under Article 5.3.7 (a) are located. If Article 5.3.7 (b) applies, the Filing Constituent Entity shall report “UPE” in a separate row (for Eligible Payroll Costs and Eligible Tangible Assets that are allocated to the UPE after the application of Article 7.1.1). The Filing Constituent Entity shall report “Not applicable” for all other Eligible Payroll Costs and Eligible Tangible Assets that are excluded from the Substance-based Income Exclusion computations of the MNE Group under Article 5.3.7 (c).

Note 3.3.2.3.4: if Article 5.3.7 (a) applies, the Filing Constituent Entity shall report the aggregate relevant Eligible Payroll Costs allocated to Constituent Entity-owners (or members of JV Groups) located in each

jurisdiction identified in the 3.3.2.3.3 column. If Article 5.3.7 (b) applies, the Filing Constituent Entity shall report the Eligible Payroll Costs that are attributed to the UPE after the application of Article 7.1.1. The Filing Constituent Entity shall report the Eligible Payroll Costs that are excluded under Article 5.3.7 (c) from the Substance-based Income Exclusion (see note below).

Note 3.3.2.3.5: if Article 5.3.7 (a) applies, the Filing Constituent Entity shall report the aggregate carrying value of the relevant Eligible Tangible Assets allocated to Constituent Entity-owners (or members of JV Groups) located in each jurisdiction identified in the 3.3.2.3.3 column. If Article 5.3.7 (b) applies, the Filing Constituent Entity shall report the carrying value of the relevant Eligible Tangible Assets that are attributed to the UPE after the application of Article 7.1.1. The Filing Constituent Entity shall report the carrying value of the relevant Eligible Tangible Assets that are excluded under Article 5.3.7 (c) from the Substance-based Income Exclusion (see note below).

Note 3.3.2.3.4 and 3.3.2.3.5: Eligible Payroll Costs and Eligible Tangible Assets are excluded under Article 5.3.7 (c) from the Substance-based Income Exclusion to the extent that they are associated with: (i) FANIL allocated to a Reverse Hybrid Entity; (ii) FANIL excluded from the GloBE Income or Loss under Article 3.5.3 (i.e. attributable to non-Group members); (iii) FANIL excluded from the GloBE Income or Loss under Article 7.1.1 (i.e. UPE Flow-through Entities); and (iv) FANIL attributed to a Constituent Entity-owner (or member of JV Group) when the Eligible Employees and Eligible Tangible Assets are not located in the jurisdiction of the CE-owner.

3.3.3. Additional Current Top-up Tax

Functioning of this section – Additional Current Top-up Tax

This section provides two tables for purposes of the Additional Current Top-up Tax.

- Table (a) requires the identification of the relevant Articles other than Article 4.1.5 of the GloBE Rules that lead to Additional Current Top-up Tax being due in the Reporting Fiscal Year as well as a summary of calculation of the ETR and Top-up Tax as previously reported and as recalculated for the prior Fiscal Year, based on which the Additional Current Top-up Tax is determined.
- Table (b) assesses whether Article 4.1.5 should apply if the jurisdiction has a net GloBE Loss for the Reporting Fiscal Year.

3.3.3.1 Additional Current Top-up Tax for purposes other than Article 4.1.5

Note 3.3.3.1: the Filing Constituent Entity shall complete this table if an ETR Adjustment Article applies.

Note 3.3.3.1.1: the Filing Constituent Entity shall select all the ETR Adjustment Articles that require or permit a recalculation of the ETR and Top-up Tax for a prior Fiscal Year under Article 5.4.1. The relevant option(s) should be selected from the following list: 3.2.6, 4.4.4, 4.6.1, 4.6.4, 7.3.5, 7.3.7.

Note 3.3.3.1.1: Article 4.4.4 shall only be selected when the relevant Fiscal Year is the fifth preceding Fiscal Year and the amount of Additional Current Top-up Tax shall be determined on the basis of the information provided in Section 3.2.2.2. Article 7.3.5 shall only be selected when the relevant Fiscal Year is the fourth preceding Fiscal Year and the amount of the Additional Current Top-up Tax shall be determined on the basis of the information provided in Section 3.2.3.2.a.

Note 3.3.3.1.2: the Filing Constituent Entity shall report the prior Fiscal Year(s) to which the ETR Adjustment Articles reported in 3.3.3.1.1 apply.

Note 3.3.3.1.4-9.a: the amount as previously reported shall take into account any adjustments required by the relevant ETR Adjustment Articles in a prior Fiscal Year (if any).

Note 3.3.3.1.4-9.b: the amount recalculated shall take into account any adjustments required by the relevant ETR Adjustment Articles applied in a prior Fiscal Year (if any) and in the Reporting Fiscal Year.

Note 3.3.3.1.10: the Additional Current Top-up Tax is equal to the difference between the Top-up Tax as previously reported and Top-up Tax as recalculated.

3.3.3.2 Additional Current Top-up Tax for purposes of Article 4.1.5

Note 3.3.3.2: this Table does not need to be completed if the MNE Group has a positive amount of Net GloBE Income in the jurisdiction.

Note 3.3.3.2.1: the Filing Constituent Entity shall report the negative amount of Adjusted Covered Taxes for the jurisdiction.

Note 3.3.3.2.2: the Filing Constituent Entity shall report the GloBE Loss for the Jurisdiction.

Note 3.3.3.2.3: the Filing Constituent Entity shall report the Expected Adjusted Covered Taxes for the jurisdiction.

Note 3.3.3.2.4: the Filing Constituent Entity shall report the Additional Current Top-up Tax under Article 4.1.5 for the jurisdiction.

3.3.4. QDMTT

Note 3.3.4.1: the Filing Constituent Entity shall complete this column if the QDMTT computes Domestic Excess Profits based on a financial accounting standard other than the financial accounting standard used in preparing the Consolidated Financial Statements of the UPE. The Filing Constituent Entity shall report the Acceptable Financial Accounting Standard permitted by the Authorised Accounting Body in the jurisdiction or the Authorised Financial Accounting Standard adjusted to prevent any Material Competitive Distortions that is used for the computation of Domestic Excess Profits under the QDMTT.

Note 3.3.4.2: the Filing Constituent Entity shall report the amount payable under the QDMTT of the jurisdiction for the Reporting Fiscal Year. This amount shall be provided in the currency reported in 1.2.2.3. If the QDMTT amount payable is determined in local currency, such amount shall be translated to the presentation currency pursuant to the relevant currency translation principles of the Authorised Financial Accounting Standard used to prepare the Consolidated Financial Statements.

Note 3.3.4.3: the Filing Constituent Entity shall report the Minimum Rate applicable for QDMTT purposes, if higher than 15%.

Note 3.3.4.4: the Filing Constituent Entity shall report the basis for the blending of income and taxes for purposes of the ETR computation, if different from the GloBE Rules.

Note 3.3.4.5: the Filing Constituent Entity shall report the currency being used for purposes of the QDMTT, if different from the CFS presentation currency. If the QDMTT is elected to be applied as a QDMTT Safe Harbour (and the switch-off rule does not apply with respect to the relevant jurisdiction or subgroup), the amounts reported in section 3 shall be reported in the currency used for purposes of the QDMTT.

Note 3.3.4.6: when the QDMTT legislation requires QDMTT computations to be made using the local accounting standard and one or more Constituent Entities in the jurisdiction use a currency other than the local currency as their functional currency, the Filing Constituent Entity can make a Five-year Election to undertake the QDMTT computations using the presentation currency of the Consolidated Financial Statements or the local currency.

Note 3.3.4.7: the Filing Constituent Entity shall report “Yes” if the Substance-based Income Exclusion under Art. 5.3 of the GloBE Rules is also available for QDMTT purposes.

Note 3.3.4.8: the Filing Constituent Entity shall report “Yes” if the de minimis exclusion under Article 5.5 of the GloBE Rules is also available for QDMTT purposes.

3.4. Top-up Tax allocation and attribution (if any)

Functioning of this section – Top-up Tax allocation and attribution (if any)

Section 3.4 provides more details about the computation of the Top-up Tax payable under the GloBE Rules.

It specifies the amount of Top-up Tax payable in respect of each Low-Taxed Constituent Entity (or member of JV Group) where a QIIR applies and identifies each Parent Entity’s Allocable Share of Top-up Tax. It further provides more details on the computation of the UTPR Top-up Tax Amount, if any, as well as of the UTPR Percentage for each UTPR Jurisdiction, where relevant. Possible simplifications, such as the possibility to not report the Top-up Tax on a CE basis when the IIR does not apply are discussed below.

3.4.1. Application of the IIR in respect of this jurisdiction

Note 3.4.1: this information is only required if a QIIR applies in respect of the relevant Low-Taxed Constituent Entities or members of JV Groups.

Note 3.4.1: the information relating to Constituent Entities or members of JV Group does not need to be reported on an Entity-by-Entity basis if, for those Constituent Entities or members of JV Group:

- i a single Parent Entity applies a QIIR and the Parent’s Entity Allocable Share is 100%. In that situation, the Parent Entity’s Allocable Share of the Top-up Tax reported in 3.4.1.3.a shall equal the Jurisdictional Top-up Tax reported in 3.3.1.f; or
- ii the Inclusion Ratio of all the Parent Entities required to apply a QIIR is the same with respect to each relevant Constituent Entity or member of JV Group in the jurisdiction.

Note 3.4.1.1.a: the Group Entities that are allocated Top-up Tax are Constituent Entities, MOCEs, Investment Entities, members of JV Groups located in Low-Tax Jurisdictions or Stateless Constituent Entities with an ETR below the Minimum Rate.

Note 3.4.1.1.b: in those situations where Article 5.4.2 and/or 5.4.3 apply, the GloBE Income of each CE (or member of JV Group) shall not be used to allocate the relevant Top-up Tax but alternative allocation factors shall apply, as provided under those Articles and as clarified in this note. In those situations where Article 5.4.2 applies, the GloBE Income of each CE (or member of JV Group) shall be equal to the GloBE Income of those CEs (or members of JV Groups) in the Fiscal Years for which the recalculations under Article 5.4.1 were performed (as provided in Article 5.2.5). In those situations where Article 5.4.3 applies, the GloBE Income of each CE (or member of JV Group) shall be reported only for those CEs (or members of JV Groups) that record an Adjusted Covered Taxes amount that is less than zero and less than the GloBE Income or Loss of such CE (or member of JV Group) multiplied by the Minimum Rate and shall be computed as per the following formula: $(\text{GloBE Income or Loss} \times \text{Minimum Rate}) - \text{Adjusted Covered Taxes}$. If both Article 5.4.2 and Article 5.4.3 apply, each of the alternative factors outlined in this note should be reported separately.

Note 3.4.1.1.c: the Top-up Tax of the LTCE (or member of JV Group) is the share of the relevant amount of the Jurisdictional Top-up Tax allocated in proportion to the GloBE Income of the LTCE (or member of JV Group), obtained by multiplying the amount of the Jurisdictional Top-up Tax by the ratio of GloBE Income of the LTCE (or member of JV Group) over the aggregate GloBE Income of all LTCEs (or members of JV Groups). In those situations where Article 5.4.2 and/or 5.4.3 apply, the aggregate GloBE Income of

all LTCEs (or members of JV Groups) with GloBE Income in the jurisdiction shall not be used for purposes of allocating Top-up Tax. The relevant alternative allocation factors identified in 3.4.1.1.b shall be used instead (see Note 3.4.1.1.b). If Article 7.6 applies, the Filing Constituent Entity shall not complete row 3.4.1.1.b and the Top-up Tax of the LTCE (or member of JV Group) shall be the amount determined in accordance with Article 7.6.2(c) (or 7.6.6 for the revocation year). If an Investment Entity or Insurance Investment Entity is allocated Top-up Tax both under Article 5.2.4 and Article 7.6.2 (c), the Filing Constituent Entity shall complete rows 3.4.1.1.a to 3.4.1.1.c twice with respect to this Investment Entity or Insurance Investment Entity.

Note 3.4.1.2.a: the Filing Constituent Entity shall report the TIN (or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number) of the Parent Entity.

Note 3.4.1.2.b: the Filing Constituent Entity shall report the jurisdictions where Parent Entities of the MNE Group are required to apply a QIIR in the form of 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard. When Article 10.3.5 applies, the Filing Constituent Entity shall report the jurisdiction that requires the Parent Entity to apply its QIIR under Article 10.3.5.

Note 3.4.1.2.c: the amount of GloBE Income attributable to Ownership Interests held by other owners than the relevant Parent Entity is determined in accordance with Article 2.2.3.

Note 3.4.1.3.b: the IIR Offset is the amount of Top-up Tax that is brought into charge under a Qualified IIR by a POPE or Intermediate Parent Entity located in a lower tier of the ownership chain.

3.4.2. Total UTPR Top-up Tax amount in respect of this Jurisdiction

Note 3.4.2: table 3.4.2 only needs to be completed in respect of LTCEs for which Article 2.5.2 does not apply and members of JV Groups in respect of which the JV Group Top-up Tax is not reduced to zero after the application of Qualified Income Inclusion Rules. If Article 2.5.2 applies for all LTCEs, Table 3.4.2 does not need to be completed for any LTCE. If the JV Group Top-up Tax is reduced to zero for all JV Group members of a given JV Group, Table 3.4.2 does not need to be completed for any JV Group member of that JV Group.

Note 3.4.2.1: if no QIIR applies in respect of any LTCE (or member of JV Group) for which the Top-up Tax calculation is made, this table does not need to be filled in on an LTCE (or member of JV Group) basis and the Filing Constituent Entity shall report “all” instead of the TIN of each LTCE (or member of JV Group) or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

Note 3.4.2.2: when Article 2.5.2 does not apply, the Top-up Tax for each LTCE shall be computed by deducting the Top-up Tax payable under the QIIR by the Parent Entity from the Top-up Tax of the LTCE. The Top-up Tax for each member of a JV Group shall be computed by deducting the Top-up Tax payable under the QIIR by the Parent Entity from the UPE’s Allocable Share of the Top-up Tax of the JV Member. If no QIIR applies in respect of any LTCE (or member of JV Group) for which the Top-up Tax calculation is made and the table is filled in on a jurisdictional basis, this information does not need to be reported.

Note 3.4.2.3: the Filing Constituent Entity shall report the Total UTPR Top-up Tax Amount in respect of the jurisdiction.

Note 3.4.2.3: the Filing Constituent Entity shall report the sum of all amounts reported in 3.4.2.2 (Top-up Tax taken into account for Article 2.5.1) for each Low-Taxed Constituent Entity and member of a JV Group located in a Low-Tax Jurisdiction as well as for each Stateless Constituent Entity that has an amount reported in 3.4.2.2 If no QIIR applies in respect of any LTCE (or member of JV Group) for which the Top-up Tax calculation is made, the Top-up Tax taken into account for Article 2.5.1 is the Jurisdictional Top-up Tax computed.

3.4.3. Attribution of Top-up Tax under the UTPR

Note 3.4.3: the Filing Constituent Entity shall complete this table if there is a UTPR Top-up Tax Amount for at least one jurisdiction for the Reporting Fiscal Year or if there is a UTPR Top-up Tax carry-forward reported in column 3.4.3.2.

Note 3.4.3.1: the Filing Constituent Entity shall report the UTPR Jurisdictions of the MNE Group in the form of 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard.

Note 3.4.3.2: if the UTPR Top-up Tax Amount allocated to a jurisdiction in a prior Fiscal Year has not yet resulted in an equivalent additional cash tax expense for the Constituent Entities located in that jurisdiction, the amount to be carried forward in accordance with Article 2.4.2 shall be reported in 3.4.3.2.

Note 3.4.3.3 and 3.4.3.4 (Total): if the UTPR Percentage in 3.4.3.5 is zero for a UTPR jurisdiction as a result of the application of Article 2.6.3, the Number of Employees and Tangible Assets of the Constituent Entities located in the jurisdiction are excluded from the total (i.e. denominator of the formula for purposes of the allocation key). This exclusion from the total (and the denominator) does not apply if all UTPR jurisdictions have a UTPR Percentage of zero in the Reporting Fiscal Year (Article 2.6.4).

Note 3.4.3.3: the Number of Employees allocated to Permanent Establishments (including those of Flow-through Entities) shall be taken into account for computing the UTPR Percentage of the jurisdiction where such PEs are located. Further, the Number of Employees of Constituent Entities is subject to two exclusions under Article 2.6.2. Firstly, the number of Employees of Investment Entities in the UTPR jurisdiction shall be excluded for purposes of computing a jurisdiction's UTPR percentage (Article 2.6.2(a)). Secondly, in instances where a Flow-through Entity's employees are not allocated to PEs, they shall be allocated to any Constituent Entities that are located in the jurisdiction where the Flow-through Entity was created, irrespective of whether they are the Constituent Entity-owners of the Entity (Article 2.6.2(b)). The Number of Employees employed by a Flow-through Entity that are not otherwise allocated shall be excluded as provided under 2.6.2(b).

Note 3.4.3.4: the Net Book Value of Tangible Assets allocated to PEs (including those of Flow-through Entities) shall be taken into account for computing the UTPR Percentage of the jurisdiction where such PEs are located. Further, the Net Book Value of Tangible Assets of Constituent Entities is subject to two exclusions under Article 2.6.2. Firstly, the Net Book Value of Tangible Assets held by Investment Entities in the UTPR jurisdiction shall be excluded for purposes of computing a jurisdiction's UTPR percentage (Article 2.6.2(a)). Secondly, in instances where a Flow-through Entity's Tangible Assets are not allocated to PEs, they shall be allocated to any Constituent Entities that are located in the jurisdiction where the Flow-through Entity was created, irrespective of whether they are the Constituent Entity-owners of the Entity (Article 2.6.2(b)). The Net Book Value of the Tangible Assets held by a Flow-through Entity that are not otherwise allocated shall be excluded as provided under 2.6.2(b).

Note 3.4.3.5: the UTPR Percentage is computed in accordance with Article 2.6.1. If there is a UTPR Top-up Tax carry-forward for a UTPR jurisdiction in 3.4.3.2, the UTPR percentage of the jurisdiction shall be zero (Article 2.6.3), unless all UTPR jurisdictions have a UTPR Percentage of zero in the Reporting Fiscal Year (Article 2.6.4). The UTPR Percentage reported in this column shall be the UTPR Percentage computed after the application of Article 2.6.4.

Note 3.4.3.6 (Total): the total UTPR Top-up Tax Amount to be attributed among UTPR Jurisdictions is the sum of each Total UTPR Top-up Tax Amount in respect of each jurisdiction identified in table 3.4.3.

Note 3.4.3.7: the additional cash tax expense incurred by CEs in the UTPR jurisdiction is the amount of tax due under the UTPR in addition to the amount of tax that would otherwise be payable under normal tax rules.

Note 3.4.3.8: the UTPR Top-up tax left to be carried forward is the positive difference between the UTPR Top-up Tax amount attributed to the UTPR jurisdiction for the Reporting Fiscal Year and the additional

cash tax expense incurred by CEs in the UTPR jurisdiction reported in 3.4.3.7. When the amount attributed to the UTPR jurisdiction for the Reporting Fiscal Year (3.4.3.6) is zero, the Filing Constituent Entity shall report in column 3.4.3.8 the positive difference between the UTPR Top-up Tax carry-forward from previous Fiscal Years (3.4.3.2) and the additional cash tax expense incurred by Constituent Entities located in the UTPR jurisdiction (3.4.3.7).

Annex B. Notification that the GIR will be received under Exchange of Information

Use of the template

1. The GloBE Rules are intended to be implemented in a consistent and coordinated manner across Implementing Jurisdictions. Therefore, it is relevant to develop a standard notification template which contains a common set of information. Using a standard GIR notification template is expected to ease the compliance burden for MNE Groups and facilitate compliance coordination across Implementing Jurisdictions and QDMTT-only Jurisdictions. Implementing Jurisdictions and QDMTT-only Jurisdictions, however, are free to not use the template set out below. The use of the GIR notification template is a best practice, which means that Implementing Jurisdictions and QDMTT-only Jurisdictions are not required to use it for purposes of implementing Article 8.1.3 of the GloBE Model Rules consistently with the GloBE Model Rules and the Commentary.

2. Implementing Jurisdictions and QDMTT-only Jurisdictions are however encouraged to refrain from asking additional information that is not identified in the template for purposes of the notification due under Article 8.1.3. It is acknowledged, however, that certain additional information, such as name of the legal representative of the notifying Entity, may be needed for legal or other purposes. When assessing whether such information should be collected as part of the Article 8.1.3 notification requirement, the jurisdiction is expected to consider whether this information is necessary for identifying the jurisdiction from which it will receive the GIR, the Entity that is filing the GIR, and the local Entities for which the obligation to file the GIR will be lifted as a result of it being filed in another jurisdiction. Jurisdictions are also invited to consider whether the information may be made available to the jurisdiction at a later stage in the GloBE Information Return itself. When that is the case, jurisdictions are encouraged to refrain from collecting this additional information in the notification.

3. On the other hand, Implementing Jurisdictions and QDMTT-only Jurisdictions are free to collect less information than what is provided in the notification template, for instance because such information is already available at the level of the tax administration (e.g. address of the notifying entity).

4. Lastly, as article 8.1.3 notification supports the filing of the GIR and the GIR is filed annually, Implementing Jurisdictions and QDMTT-only Jurisdictions may request Article 8.1.3 notifications to be filed annually. However, jurisdictions are free to simplify the process as they see fit. For instance, they could only require notifications to be filed if there are subsequent changes to the information previously submitted. Under this approach, if no changes are reported, information contained in the latest prior-year notification would be considered valid for the current fiscal year.

Content of the template

5. The following paragraphs set out the content of the Article 8.1.3 notification template.

A. MNE Group information

6. Provide name of the MNE Group.

1. Name of the MNE Group

Explanatory notes:

A.1: Report the name of the MNE Group that is commonly used in the preparation of the Consolidated Financial Statements.

B. Entity Information

7. Provide information for each Entity that is covered by this notification.

1. Name	2. Address	3. Tax identification number	4. Designated Local Entity?
Entity 1			
Entity 2			
Etc.			

Explanatory notes:

In this table, the notifying Entity shall provide the name, address and TIN of each Entity that is covered by this notification.

The information in the table shall be reported as of last day of the Reporting Fiscal Year, or the last day before the Entity left the MNE Group, except for Item 2, Address, which shall be reported as of the filing date of this notification.

If an Entity is a member of more than one MNE Group for a Fiscal Year, that Entity would need to file a separate Article 8.1.3 notification in respect of each MNE Group that it is a member of.

This notification should not be submitted if the Filing Constituent Entity files the GIR locally under Article 8.1.1. This is because Art 8.1.3 only applies if Article 8.1.2 turns off the local filing requirement because a GIR has been filed in a jurisdiction with a QCAA in effect.

B.2: The format of the address shall be reported in line with relevant local requirements.

B.3: The TIN should be the same as the TIN that is disclosed in Table 1.3.2.1.5 of the GIR (i.e. the TIN of the Entity that is used for purposes of Covered Taxes in the local jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number).

B.4: Under Article 8.1.3, Constituent Entities located in one jurisdiction may appoint one Constituent Entity that is located in the same jurisdiction (i.e. the Designated Local Entity) to submit the Article 8.1.3 notifications on their behalf. If a Designated Local Entity is appointed to submit the Article 8.1.3 notification on behalf of multiple Entities located in one jurisdiction, note which Entity is the Designated Local Entity in column 4.

C. Contact person(s)

8. Provide information for a contact person of the Designated Local Entity (or a designated representative of the Designated Local Entity). If no Designated Local Entity is appointed, provide this information for each Entity that is included in Table B.

1. Name	2. Contact information	3. Title/capacity
Contact person 1		
Contact person 2 (optional)		

Explanatory notes:

C.1, C.2: The contact information provided in this notification shall be, as of the filing date of this notification, the most reliable way by which the tax administration may contact the Entity, which could include, for instance, email address, phone number, mailing address, or generic email address of the Entity.

C.3: Note here if the contact person is an agent acting on behalf of the notifying Entity.

D. UPE Information

9. Provide information for the UPE of the MNE Group:

1. Name	
2. Jurisdiction	
3. Address	
4. TIN	
5. TIN of the UPE in the local jurisdiction (if different, and if any)	
6. Will the local jurisdiction receive the GIR from the UPE jurisdiction under Exchange of Information?	Yes/no

Explanatory notes:

The information in the table shall be reported as of last day of the Reporting Fiscal Year, or the last day before the Entity left the MNE Group, except for Items 3 and 6, which shall be reported as of the filing date of this notification.

If the MNE Group is a Multi-Parented MNE Group, this table shall be completed for each UPE.

D.1: report the name of the UPE as defined in Article 1.4 and Article 10.1 of the GloBE Model Rules.

D.2: report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction where the UPE is located for GloBE purposes.

D.3: The format of the address shall be reported in line with relevant local requirements.

D.4: report the TIN of the UPE used for purposes of Covered Taxes in the jurisdiction where the UPE is located for GloBE purposes or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number. This is the same TIN as the TIN that is contained in Table 1.3.1.4 of the GIR.

D.5: report the TIN (if any) issued to the UPE by the local jurisdiction. This is the same TIN as the TIN that is contained in Table 1.3.1.5 of the GIR.

E. DFE Information (if relevant)

10. If the local jurisdiction will receive the GloBE Information Return via Exchange of Information from the jurisdiction of a DFE (instead of that of the UPE), provide information for the DFE:

1. Name	
2. Jurisdiction	
3. Address	
4. TIN	
5. TIN of the DFE in the local jurisdiction (if different, and if any)	

Explanatory notes:

The information in the table shall be reported as of last day of the Reporting Fiscal Year, or the last day before the Entity left the MNE Group, except for Item 3, which shall be reported as of the filing date of this notification.

Table D (information for the UPE of the MNE Group) shall still be completed even if the UPE is not filing the GIR and the DFE is filing the GIR centrally instead.

E.2: report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction where the DFE is located for GloBE purposes.

E.3: The format of the address shall be reported in line with relevant local requirements.

E.4: report the TIN of the DFE used for purposes of Covered Taxes in the jurisdiction where the DFE is located for GloBE purposes or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number. This is the same TIN as the TIN that is contained in Table 1.1.3 of the GIR if the DFE is the Filing Constituent Entity.

E.5: report the TIN (if any) issued to the DFE by the local jurisdiction.

F. Period covered by Article 8.1.3 notification

11. MNE Groups making notifications in jurisdictions with annual reporting requirements shall complete the following table:

1. Start date of the Reporting Fiscal Year	
2. End date of the Reporting Fiscal Year	

12. MNE Groups making notifications in jurisdictions that only require the reporting of changes shall complete the following table:

1. Start date of the first Reporting Fiscal Year covered by this notification	
2. End date of the first Reporting Fiscal Year covered by this notification	

Annex C. Transitional Penalty Relief

Transitional Penalty Relief

1. The common understanding on penalties set out in this Annex requires that Implementing Jurisdictions and QDMTT-only Jurisdictions give careful consideration as to the appropriateness of applying penalties or sanctions where an MNE has taken reasonable measures to ensure the correct application of the GloBE Rules or the QDMTT.

2. The term “reasonable measures” is not defined by this document. Rather it should be understood in light of each jurisdiction’s existing rules and practice. An MNE can demonstrate it has taken reasonable measures if it can demonstrate it has, in good faith, put in place the appropriate systems to understand and comply with the rules. Whether a taxpayer has met the standard of taking reasonable measures must be assessed by a tax administration based on the facts and circumstances of the case. For example, a tax administration could waive the imposition of a penalty on the UPE or Filing Constituent Entity if such Entity fully disclosed the impugned GloBE computation to the tax administration. Other examples where tax administrations may waive penalties or sanctions during the Transition Period, include:

- where there is a mistake of fact that is reasonable in the circumstances;
- the errors can be reasonably attributed to unfamiliarity with the rules in the initial implementation years (e.g., isolated mathematical or transposition errors);
- the requirements of the rule are unclear and the MNE’s actions are based on a reasonable interpretation of the rule; or
- the MNE’s actions do not result in a reduction of Top-up Tax liability in the current or future year.

3. In many cases, jurisdictions already provide, as a matter of law or administrative practice, for penalty relief in accordance with the common understanding. Other jurisdictions may need to adapt these penalty relief requirements to fit within their constitutional and legal system. While the common understanding aims to provide relief for all penalties or sanctions in connection with a GloBE Information Return, the requirement that the MNE must take reasonable measures means that, in practice, the transitional penalty relief would not apply to cases of avoidance, fraud, or abuse. Finally, the transitional penalty relief would not impact the requirement to correct any errors and pay any unpaid/underpaid Top-up Tax (including any interest) for previous Fiscal Years in accordance with requirements of domestic legislation.

Tax Challenges Arising from the Digitalisation of the Economy – GloBE Information Return (January 2025)

Inclusive Framework on BEPS

The GloBE Information Return sets out a standardised information return to facilitate compliance with and administration of the GloBE Rules. The GIR was released by the Inclusive Framework on BEPS in July 2023. This version incorporates clarifications on how to complete the GIR and reflects the Administrative Guidance released in December 2023 and June 2024. This version also includes a template that could be used to notify jurisdictions that they will receive the GIR through exchange of information.

