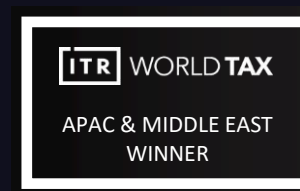




OECD Updates on *GIR Filings & UTPR SH*

The OECD has provided guidance on additional support measures for GloBE Information Return (GIR) filings for fiscal years starting on or after **1 January 2024**.



Key Aspects

A Current GIR Compliance Requirement

The OECD has provided guidance on additional support measures for GloBE Information Return (GIR) filings for fiscal years starting on or after **1 January 2024**. Currently, **37** jurisdictions have implemented either a QDMTT or an IIR for FY 2024 (the implementing jurisdictions), triggering GIR filing or exchange-of-information notification obligations for in-scope MNE Groups from 30 June 2026 for the 2024 reporting year.

B Agreed On Relief

However, not all **37 jurisdictions** have completed the process of signing the GIR MCAA, and some are not expected to fully operationalise their GIR filing portals in time for the applicable filing deadline. As a result, considerable uncertainty remains regarding local GIR filing obligations.

To address this concern, Implementing jurisdictions have agreed to **waive penalties** and will **not require local GIR filing** where it is centrally filed in one of the **33 listed jurisdictions** and the GIR notification has been filed in the local jurisdiction by the relevant deadline; however, local filing may still be required if the GIR has not been exchanged with a jurisdiction by **31 December 2026**, and the OECD is expected to publish by **31 May 2026** a list of jurisdictions with fully operational GIR filing portals.

Key Aspects

B Agreed On Relief (Continued)

The jurisdictions listed in the annex also include *Barbados, Bulgaria, Czechia, Poland, Romania* and *Turkey*, which are not yet signatories to the GIR MCAA. In addition, *Greece* and *Poland* have joined the common understanding only in respect of the EU member states referred to in the annex.

C Update To Central Record

The latest update further confirms that *Bahamas, Kenya, Kuwait and Oman* have now completed the transitional qualification process for their Domestic Minimum Top-up Taxes (DMTTs), increasing the total number of jurisdictions qualified for IIR purposes to **44** and the number of jurisdictions qualified for DMTT and the QDMTT Safe Harbour to **50**.

Key Aspects

D Transitional UTPR Safe Harbour

Original Definition: In **July 2023**, the OECD introduced a Transitional UTPR Safe Harbour for fiscal years up to 12 months starting on or before **31 December 2025** and ending before **31 December 2026**, applicable to UPEs in jurisdictions with tax rates **at or above 20%**. However, its original definition unintentionally excluded MNE Groups using a **52/53-week financial year**.

OECD Clarification: The OECD has clarified that MNE Groups with a **52/53-week** financial year may also access the Transitional UTPR Safe Harbour, now extended to fiscal years ending on or before **3 January 2027**.

Key Takeaway

The first major tranche of Pillar Two compliance will commence from **30th June 2026**. The OECD has continued to issue clarifications and administrative updates in relation to these compliance obligations. MNE Groups should take proactive steps to evaluate and implement the latest guidance to ensure timely and effective compliance with the Pillar Two framework.

THANK YOU

For any support or clarification on Pillar Two, please feel free to reach out to VSTN Consultancy

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