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# *Multinational Enterprise Top-Up Tax and Domestic Top-Up Tax*

## **Module Nine: GloBE and DTT-Related Compliance Obligations**



May 2026

# Outline of Module

- + Key Compliance Milestones for In-Scope MNE Groups**
- + Registration and Filing Obligations**
- + Incidence of Tax**
- + Record-Keeping Requirements**

# Abbreviations

- **Admin Regulations :** Multinational Enterprise (Minimum Tax) (Administrative Matters) Regulations 2025 of Singapore
- **BEPS :** base erosion and profit shifting
- **CE :** constituent entity
- **Comptroller :** Comptroller of Income Tax
- **DFE :** designated local DTT filing entity
- **DTL :** deferred tax liability
- **DTT :** domestic top-up tax
- **ETR :** effective tax rate
- **FTE :** flow-through entity
- **FY :** financial year
- **FYE :** financial year end
- **GFE :** designated local GIR filing entity
- **GIR :** GloBE information return
- **GloBE :** Global Anti-Base Erosion
- **IF :** OECD / G20 Inclusive Framework on BEPS
- **IIR :** income inclusion rule
- **IPE :** intermediate parent entity
- **JV :** joint venture
- **MMT Act :** Multinational Enterprise (Minimum Tax) Act 2024 of Singapore
- **MMT Regulations :** Multinational Enterprise (Minimum Tax) Regulations 2024 of Singapore
- **MTT :** multinational enterprise top-up tax
- **NOA :** notice of assessment
- **RHE :** reverse hybrid entity
- **UPE :** ultimate parent entity
- **UTPR :** undertaxed profits rule

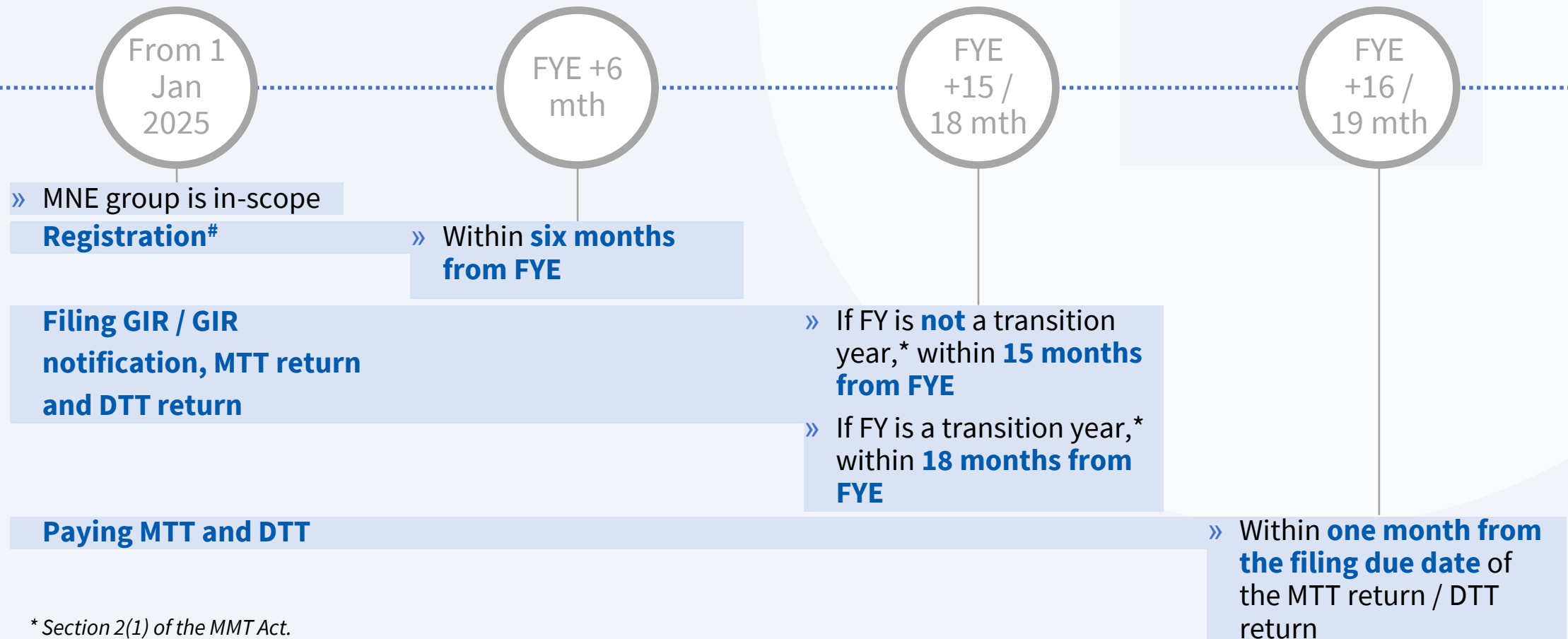


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# Key Compliance Milestones in Singapore for In-Scope MNE Groups

# Key Compliance Milestones

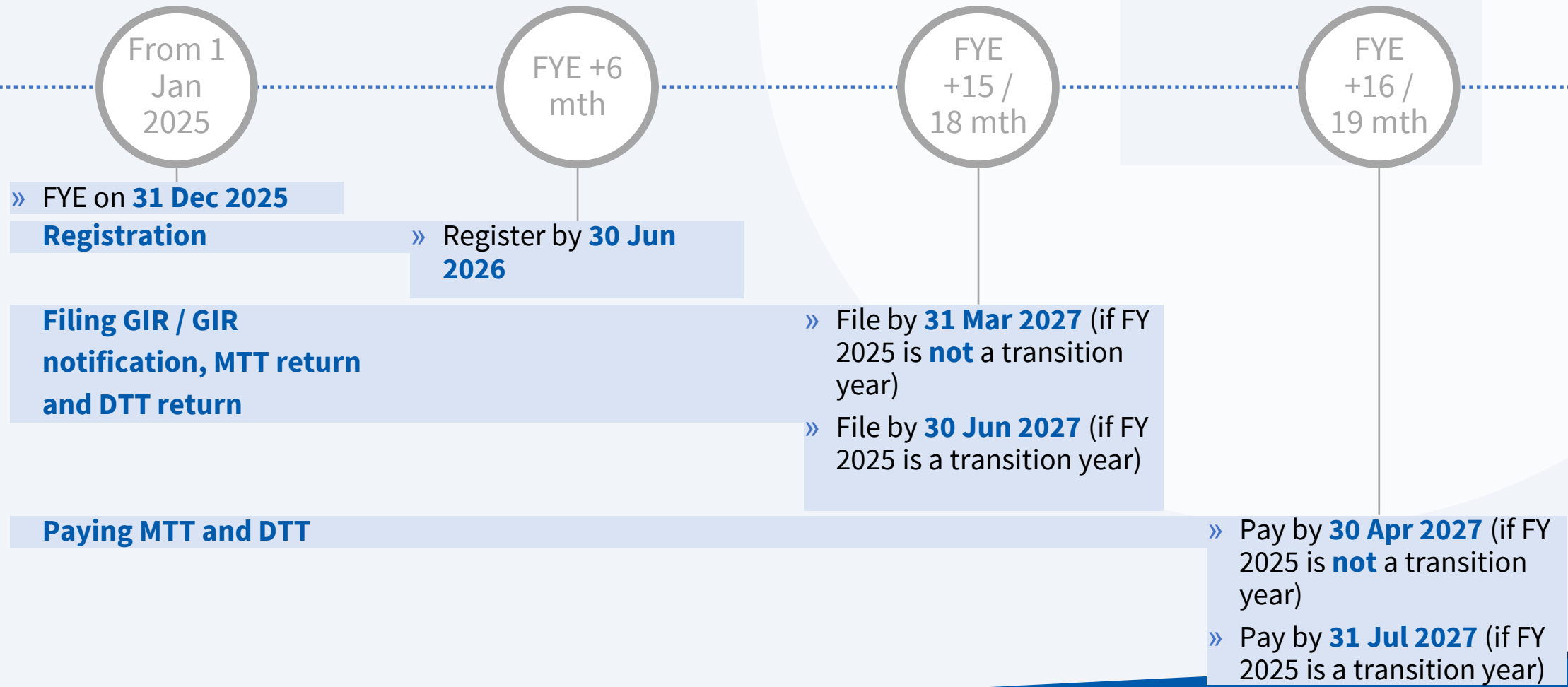


\* Section 2(1) of the MMT Act.

# Including designating the GFE and DFE.

# Key Compliance Milestones

## Example





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# Registration and Filing Obligations

# Scope

Registration

Designation of the GFE and DFE

GIR and GIR notification filing

MTT return and DTT return filing

# Registration

- An MNE group is required to be registered under the MMT Act if all the following conditions are met:
  - the MNE group has an annual revenue of EUR 750 mil or more, as reported in the consolidated financial statements of the UPE for at least two out of the four preceding FYs; and
  - the MNE group has at least one CE or a JV located in Singapore, or at least one RHE that is incorporated or registered in Singapore.
- The UPE of such an MNE group must register with the Comptroller **within six months** (or such extended period as the Comptroller may allow) **from the FYE of that FY**.<sup>\*</sup>
  - For information on how to register, please refer to [IRAS' "Registration for MTT and DTT" webpage](#).

<sup>\*</sup> Sections 31(1) and 31(2) of the MMT Act.

# Registration

- In the case of a multi-parent group,\* **all the UPEs of a multi-parent group are liable to register** under section 31 of the MMT Act.
- However, for administrative purposes, a multi-parent group can decide and **appoint any one of its UPEs to register**.
- If an MNE group fails to register, all the UPEs of every group in the multi-parent group are liable to a surcharge, and those UPEs bear that liability in equal shares.\*\*

\* Section 2(1) of the MMT Act.

\*\* Regulation 61B(3) of the MMT Regulations.

# Scope

Registration

Designation of the GFE and DFE

GIR and GIR notification filing

MTT return and DTT return filing

# Designation of the GFE and DFE

## What is a “GFE” and “DFE”?

GFE	DFE
<ul style="list-style-type: none"> <li>A <b>CE located in Singapore of a registered MNE group</b> that is responsible for <b>filing the GIR or GIR notification</b> (as the case may be) with the Comptroller.*</li> </ul>	<ul style="list-style-type: none"> <li>A <b>CE located in Singapore of a registered MNE group</b> that is responsible for <b>filing the DTT return</b> with the Comptroller.**</li> </ul>
<ul style="list-style-type: none"> <li>A securitisation entity shall not be designated as a GFE and DFE unless it is the only CE of the MNE group located in Singapore.***</li> </ul>	

\* Section 40(1) of the MMT Act.

\*\* Section 43(1) of the MMT Act.

\*\*\* Sections 2(6G), 2(6H), 33(1A) and 34(1A) of the MMT Act.

# Designation of the GFE and DFE

## What is a “GFE” and “DFE”?

GFE	DFE
<ul style="list-style-type: none"> <li>The GFE and DFE of a registered MNE group is:*               <ol style="list-style-type: none"> <li>the <b>UPE of the MNE group</b> located in Singapore that is not an excluded entity;</li> <li>if there is no UPE located in Singapore, the <b>IPE of the MNE group</b> that is: (i) located in Singapore; (ii) the parent entity of all the other CEs of the MNE group located in Singapore; <b>and</b> (iii) not an excluded entity; and</li> <li>if there is no such UPE or IPE located in Singapore, any <b>CE of the MNE group</b> that is: (i) a legal person located in Singapore; <b>or</b> (ii) a registered branch of a foreign company that is located in Singapore and part of the MNE group. If there is no such CE, then a <b>PE of the MNE group</b> that is located in Singapore.</li> </ol> </li> </ul>	

- The GFE and DFE of an MNE group must be **the same CE**.\*\*

\* Regulations 3(1) and 4 of the Admin Regulations.

\*\* Regulation 5 of the Admin Regulations.

# Designation of the GFE and DFE

## What is a “GFE” and “DFE”?

- In the case of a multi-parent group, **the multi-parent group can decide which UPE to fulfil the obligation** of designating a DFE under section 34(2) of the MMT Act.
- If an MNE group does not have a CE located in Singapore that satisfies the qualifying conditions, or fails to designate a GFE and DFE, the Comptroller must deem a GFE and DFE for the MNE group.\*

\* Sections 33(3), 33(3A), 34(3) and 34(3A) of the MMT Act.

# Designation of the GFE and DFE

## When to designate the GFE and DFE?

GFE	DFE
<ul style="list-style-type: none"><li>An MNE group must designate its GFE and DFE <b>at the point of registration with the Comptroller</b>.<ul style="list-style-type: none"><li>i.e. within <b>six months</b> from the FYE of the first FY which it is in-scope of the MMT Act (or such extended time as the Comptroller may allow).*</li></ul></li></ul>	

\* Section 31(2) of the MMT Act.

# Scope

Registration

Designation of the GFE and DFE

**GIR and GIR notification filing**

MTT return and DTT return filing

# GIR and GIR Notification Filing

What is a “GIR” and who needs to file the GIR or GIR notification?\*

- The GIR is a **standardised information return** under the GloBE Model Rules that provides a tax administration with the information needed to evaluate the correctness of a GloBE top-up tax liability.
- The **GFE** of a registered MNE group is required to file the GIR with the Comptroller for a FY.\*\*
- If a GIR for a FY has been filed with a foreign jurisdiction, and Singapore has an information exchange agreement to receive the GIR from that foreign jurisdiction, the GFE must file a **GIR notification** (instead of a GIR) with the Comptroller for that FY.\*\*\*

\* Section 2(1) of the MMT Act.

\*\* Section 40(1) of the MMT Act.

\*\*\* Sections 40(2) and 40(3) of the MMT Act.

# GIR and GIR Notification Filing

## When to file the GIR or GIR notification?

- The GFE must file the MNE group's GIR or GIR notification (as the case may be) for a FY **within 15 months (or 18 months if the FY is a transition year) from the FYE of that FY.**\*
- A “transition year” refers to the first FY: (a) the MNE group comes within the scope of the laws of any jurisdiction imposing a qualified IIR or qualified UTPR; or (b) for which the MNE group is liable to be registered under the MMT Act, whichever is earlier.\*\*

\* Section 40(4) of the MMT Act.

\*\* Section 2(1) of the MMT Act.

# GIR and GIR Notification Filing

## When to file the GIR or GIR notification?

- Example 1:
  - The UPE of MNE Group A is located in Singapore, and the group has its FY from 1 Apr 2025 to 31 Mar 2026.
  - The CEs of MNE Group A are located only in jurisdictions that have implemented the GloBE Rules on or after 1 Jan 2025.
  - The FY from 1 Apr 2025 to 31 Mar 2026 **is a transition year** for MNE Group A because that is the first FY that it is liable to be registered under the MMT Act and it was not under the scope of any laws imposing a qualified IIR or qualified UTPR before that FY.
  - The GFE must file MNE Group A's GIR by 30 Sep 2027 (i.e. **within 18 months** from the FYE of that FY).

# GIR and GIR Notification Filing

## When to file the GIR or GIR notification?

- Example 2:
  - The UPE of MNE Group B is located in Singapore, and the group has its FY from 1 Aug 2025 to 31 Jul 2026.
  - Some of the CEs of MNE Group B are located in jurisdictions that have implemented the GloBE Rules prior to 1 Jan 2025, and the MNE group falls within the scope of those jurisdictions' GloBE Rules.
  - The FY from 1 Aug 2025 to 31 Jul 2026 **is not a transition year** for MNE Group B because the MNE group was already within the scope of another jurisdiction's laws imposing a qualified IIR or qualified UTPR before that FY.
  - The GFE must file MNE Group B's GIR by 31 Oct 2027 (i.e. **within 15 months** from the FYE of that FY).\*

# GIR and GIR Notification Filing

## How to file the GIR or GIR notification?

- GIR:
  - The format and requirements are based on the [OECD / IF document entitled “Tax Challenges Arising from the Digitalisation of the Economy – GloBE Information Return”](#).
  - The GIR must be filed with the Comptroller in **XML format** in accordance with the [GIR XML Schema entitled “GloBE Information Return \(Pillar Two\) XML Schema”](#).
  - The submission of the GIR must be carried out by a Corppass-authorized personnel of the GFE via IRAS’ myTax Portal. Details will be released later on IRAS’ website.

# GIR and GIR Notification Filing

## How to file the GIR or GIR notification?

- GIR notification:
  - Applicable **only** to non-Singapore-headquartered MNE groups if Singapore is expected to receive the GIR from the jurisdiction of the UPE or the Designated Filing Entity of the MNE group under an exchange of information. Otherwise, the relevant sections of the GIR must be filed locally.
  - To be submitted to the Comptroller electronically. Details will be released later on IRAS' website.

# Scope

Registration

Designation of the GFE and DFE

GIR and GIR notification filing

**MTT return and DTT return filing**

# MTT Return and DTT Return Filing

What is a MTT return and DTT return and who needs to file them?

- The MTT and DTT returns are domestic returns that must be filed by taxpayers to declare and pay tax under the MMT Act. Submission will take place via a digital filing service under IRAS' myTax Portal – details will be released later on IRAS' website.

MTT return	DTT return
<ul style="list-style-type: none"> <li>The parent entity that is a <b>responsible member</b> of a registered MNE group located in Singapore is responsible for filing the MTT return with the Comptroller for a FY.*</li> </ul>	<ul style="list-style-type: none"> <li>The <b>DFE</b> of a registered MNE group is responsible for filing the DTT return with the Comptroller for a FY.**</li> </ul>

\* Section 41(1) of the MMT Act.

\*\* Section 43(1) of the MMT Act.

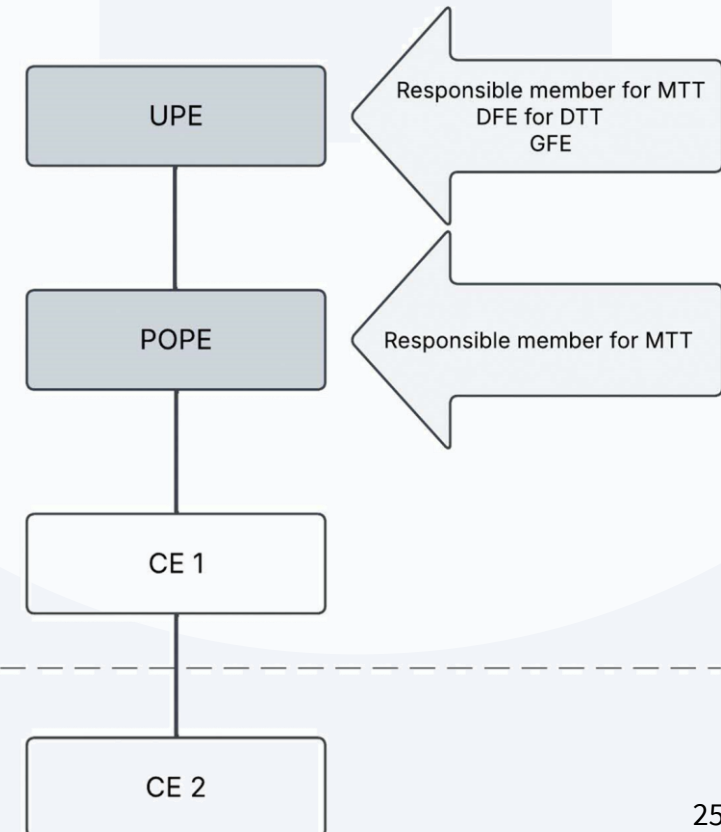
# MTT Return and DTT Return Filing

## Who needs to file the MTT return and DTT return?

- There may be **more than one responsible member** of a registered MNE group.
  - If so, each responsible member in Singapore must file its own MTT return with the Comptroller.
  - In contrast, there is only one DFE of a registered MNE group, and only one DTT return for the MNE group must be filed by the DFE.
- Even if the MTT or DTT payable is **nil**, a **nil return** must be filed.

Example:

Singapore  
(implements  
MTT and DTT)



Jurisdiction S  
(implements  
QDMTT)

# MTT Return and DTT Return Filing

## When to file the MTT return and DTT return?

MTT return	DTT return
<ul style="list-style-type: none"><li>The MTT return for a FY must be filed by the responsible member <b>within 15 months (or 18 months if the FY is a transition year) from the FYE of that FY</b>, or such extended time as the Comptroller may allow.*</li></ul>	<ul style="list-style-type: none"><li>The DTT return for a FY must be filed by the DFE <b>within 15 months (or 18 months if the FY is a transition year) from the FYE of that FY</b>, or such extended time as the Comptroller may allow.**</li></ul>

\* Sections 41(3) and 41(4) of the MMT Act.

\*\* Sections 43(4) and 43(5) of the MMT Act.

# MTT Return and DTT Return Filing

- If the responsible member or DFE:
  - fails to submit a MTT return or DTT return respectively by the filing due date; or
  - submits an incorrect or incomplete MTT return or DTT return respectively, the Comptroller may estimate the MTT or DTT payable and issue a NOA.\*

\* Sections 49(1) and 49(2) of the MMT Act.



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# Incidence of Tax

# Incidence of Tax

## Who is responsible for paying the MTT and DTT payable?

MTT	DTT
<ul style="list-style-type: none"> <li>The parent entity that is a <b>responsible member</b> that has filed the MTT return with the Comptroller for a FY (under section 41(1) of the MMT Act) is responsible for paying the MTT payable to the Comptroller.*</li> </ul>	<ul style="list-style-type: none"> <li>The <b>DFE</b> that has filed the DTT return with the Comptroller for a FY (under section 43(1) of the MMT Act) is responsible for paying the DTT payable to the Comptroller.**               <ul style="list-style-type: none"> <li>The MNE group may internally determine how the DTT payable is to be shared between the different entities.</li> </ul> </li> </ul>

\* Section 42(1) of the MMT Act.

\*\* Section 44(1)(a) of the MMT Act.

# Incidence of Tax

Who is responsible for paying the MTT and DTT payable?

MTT	DTT
<ul style="list-style-type: none"> <li>If there is <b>MTT in arrears</b>, the parent entity that is a responsible member that has filed the MTT return with the Comptroller for a FY is <b>liable for the MTT or interest in arrears</b> for the FY that the MTT relates to.</li> </ul>	<ul style="list-style-type: none"> <li>If there is <b>DTT in arrears</b>, every:               <ol style="list-style-type: none"> <li>CE located in Singapore of the MNE group;</li> <li>JV and JV subsidiary located in Singapore, and connected to the MNE group; and</li> <li>RHE formed, registered or incorporated in Singapore,</li> </ol>               is <b>jointly and severally liable for the DTT or interest in arrears</b> for the FY that the DTT relates to.             </li> </ul>

# Recap – Section 45(1) Election

- An MNE group may elect for the **part of the DTT attributable to a particular CE** of the MNE group, or JV or JV subsidiary connected to the MNE group, to be **paid by such an entity** instead of the DFE.\*
- An MNE group may make a section 45(1) election for any such entity in the MNE group, provided that the entity does not trigger any of the disqualifying conditions set out in section 45(3) of the MMT Act.

\* Section 45(1) of the MMT Act.

# Incidence of Tax

Who is responsible for paying the MTT and DTT payable?

MTT	DTT
-	<ul style="list-style-type: none"><li>• Where a section 45(1) election is made for an entity, <b>such an entity is responsible for paying its share of the DTT payable</b> to the Comptroller.</li><li>• If the entity then leaves the MNE group, the Comptroller may <b>make an assessment of DTT on the MNE group</b> requiring the group to pay the DTT attributable to that entity.</li></ul>

# Incidence of Tax

What is the deadline for paying the MTT and DTT payable?

MTT	DTT
<ul style="list-style-type: none"> <li>The <b>responsible member</b> must pay the MTT payable for that FY to the Comptroller <b>within one month from the filing due date</b>, or such extended time as the Comptroller may allow.*</li> </ul>	<ul style="list-style-type: none"> <li>The <b>DFE</b> must pay the DTT payable for that FY to the Comptroller <b>within one month from the filing due date</b>, or such extended time as the Comptroller may allow.**</li> </ul>
<ul style="list-style-type: none"> <li>Payment must be denominated in Singapore dollars,*** and in full.               <ul style="list-style-type: none"> <li>Modes of payment – GIRO (recommended), telegraphic transfer and PayNow (below \$200,000).</li> </ul> </li> </ul>	

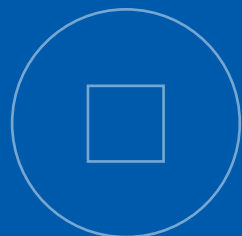
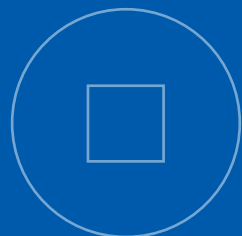
\* Sections 42(1) and 42(3) of the MMT Act.

\*\* Sections 44(1)(a) and 44(4) of the MMT Act.

\*\*\* Sections 42(2) and 44(3) of the MMT Act.



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# Record-Keeping Requirements

# Record-Keeping Requirements

Who is responsible for record-keeping for the MTT and DTT?

MTT	DTT
<ul style="list-style-type: none"> <li>The parent entity that is a <b>responsible member</b> of the MNE group.*</li> </ul>	<ul style="list-style-type: none"> <li>Each:               <ol style="list-style-type: none"> <li><b>CE of the MNE group located in Singapore;</b></li> <li><b>JV and JV subsidiary located in Singapore, and connected to the MNE group; and</b></li> <li><b>RHE formed, registered or incorporated in Singapore.**</b></li> </ol> </li> </ul>

\* Regulation 7(2)(a) of the Admin Regulations.

\*\* Regulation 7(2)(b) of the Admin Regulations.

# Record-Keeping Requirements

What is the record-keeping period for the MTT and DTT?

MTT	DTT
<u>General record-keeping period</u>	
<ul style="list-style-type: none"> <li>Until 31 Dec of the <b>5<sup>th</sup> year after the year in which the MTT return is due.</b>*</li> </ul>	<ul style="list-style-type: none"> <li>Until 31 Dec of the <b>5<sup>th</sup> year after the FY to which the DTT relates.</b>***</li> </ul>
<u>Extended record-keeping period<sup>#</sup></u>	
<ul style="list-style-type: none"> <li>Until 31 Dec of the <b>10<sup>th</sup> year after the year in which the MTT return is due.</b>**</li> </ul>	<ul style="list-style-type: none"> <li>Until 31 Dec of the <b>10<sup>th</sup> year after the FY to which the DTT relates.</b>*** *</li> </ul>

\* Regulation 7(1)(a)(ii) of the Admin Regulations.

\*\* Regulation 7(1)(a)(i) of the Admin Regulations.

\*\*\* Regulation 7(1)(b)(ii) of the Admin Regulations.

\*\*\* \* Regulation 7(1)(b)(i) of the Admin Regulations.

<sup>#</sup> Records that substantiate the calculation of the provisions in the GloBE Rules that require looking back at the MNE group's past years figures.

# Record-Keeping Requirements

## What is the record-keeping period for the MTT and DTT?

- Example:
  - MNE Group C has its FY from 1 Feb 2025 to 31 Jan 2026, and this FY **is not a transition year** for the group. Its MTT return is due on 30 Apr 2027 (i.e. **within 15 months** from 31 Jan 2026).
  - General record-keeping that relate to:
    - the MTT payable – are to be kept until 31 Dec 2032 (i.e. the **5<sup>th</sup> year** after 2027).
    - the DTT payable – are to be kept until 31 Dec 2031 (i.e. the **5<sup>th</sup> year** after 2026).

# Record-Keeping Requirements

## What is the record-keeping period for the MTT and DTT?

- Example (continued):
  - In FY 2025, the adjusted covered taxes of the CEs of MNE Group C included the deferred tax expenses that do not qualify for the exception for DTL recapture under regulation 46(3) of the MMT Regulations.
  - Extended record-keeping – records pertaining to the deferred tax expenses taken into account for MTT / DTT computation, tracking schedules of the DTL subject to recapture, any other documentation for applying simplification methodologies for the DTL recapture (if used), etc. that relate to:
    - the MTT payable – are to be kept until 31 Dec 2037 (i.e. the **10<sup>th</sup> year** after 2027).
    - the DTT payable – are to be kept until 31 Dec 2036 (i.e. the **10<sup>th</sup> year** after 2026).

# Record-Keeping Requirements

What are the types of records that must be kept and retained?

- Records must be sufficient to:<sup>\*</sup>
  - ascertain the MTT and/or DTT payable in respect of the MNE group concerned for a FY;
  - ascertain the top-up amount and ETR of a CE, JV or JV subsidiary of, or connected to, the MNE group concerned for a FY; and
  - verify the correctness of any re-computation of any of the above.
- For information on the types of record to be kept, refer to section 10 of the [IRAS e-Tax Guide entitled “Multinational Enterprise Top-Up Tax and Domestic Top-Up Tax \(Second Edition\)”](#).

<sup>\*</sup> Section 37(2) of the MMT Act.



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The information presented in the slides aims to provide a better general understanding of taxpayers' tax obligations and is not intended to comprehensively address all possible tax issues that may arise. This information is correct as at the date of presentation. While every effort has been made to ensure that this information is consistent with existing law and practice, should there be any changes, IRAS reserves the right to vary its position accordingly.