

## EXPLANATORY NOTES TO FORM FOR REGISTRATION OF MNE GROUP UNDER THE MULTINATIONAL ENTERPRISE (MINIMUM TAX) ACT 2024 (“REGISTRATION FORM”)

<b>Abbreviations</b>	
CE	Constituent Entity
CFS	Consolidated Financial Statements
DFE	Designated Local DTT Filing Entity
DTT	Domestic Top-up Tax
ETR	Effective Tax Rate
FY	Financial Year
FYE	Financial Year End
GFE	Designated Local GIR Filing Entity
GIR	GloBE Information Return
GloBE	Global Anti-Base Erosion
IIR	Income Inclusion Rule
IRAS	Inland Revenue Authority of Singapore
JV	Joint Venture
MNE	Multinational Enterprise
MMT Act	Multinational Enterprise (Minimum Tax) Act 2024
MTT	Multinational Enterprise Top-up Tax
UPE	Ultimate Parent Entity
UTPR	Undertaxed Profits Rule

<b>Title</b>	<b>Description / Remarks</b>
<b>Name of MNE group</b>	<p>State the name of the MNE Group that is used in the preparation of the CFS. The name of the MNE group should match the name to be provided / provided in the GIR.</p>
<b>Start and end dates of the first FY during which the group is subject to IIR or UTPR in any jurisdiction</b>	<p>The first FY which the MNE group is subject to IIR or UTPR refers to the transition year for purposes of filing the MTT and DTT returns, and the GIR.</p> <p>The transition year is defined under Section 2(1) of the MMT Act as the first FY in which the MNE group comes within the scope of the law of any jurisdiction imposing a qualified IIR or qualified UTPR, or for which the MNE group is liable to be registered for MTT and DTT, whichever is earlier.</p> <p><b>Example 1:</b></p> <p>An MNE group’s UPE is located in Jurisdiction Y where a qualified IIR was implemented in FY 2024. The Group has two CEs in Singapore. The MNE group’s FYE is 31 Dec.</p> <p>Since the MNE group had come within scope of a qualified IIR in Jurisdiction Y for FY 2024, for purposes of filing MTT and DTT returns in Singapore, FY 2024 is the transition year for the MNE group and FY 2025 will not be considered as the transition year for the MNE group. This is notwithstanding that Singapore implemented the MTT and DTT in FY 2025.</p> <p>In this example, the start and end dates of the first FY during which the MNE group is subject to IIR or UTPR are 1 Jan 2024 and 31 Dec 2024, respectively.</p>

	<p><b>Example 2:</b></p> <p>An MNE group's UPE is located in Singapore. The group has an intermediate parent entity located in Jurisdiction Z, where a qualified IIR was implemented in FY 2024. The MNE group's FYE is 31 Dec.</p> <p>As the intermediate parent entity is subject to qualified IIR in Jurisdiction Z for FY 2024, for purposes of filing MTT and DTT returns in Singapore, FY 2024 is the transition year for the MNE group. This is notwithstanding that MNE group's UPE is in Singapore and MTT and DTT were implemented in Singapore in FY 2025. In this example, the start and end dates of the first FY during which the MNE group is subject to IIR or UTPR are 1 Jan 2024 and 31 Dec 2024, respectively.</p>										
<p><b>Start and end dates of the first FY under the MMT Act</b></p>	<p>An MNE group is liable for registration under the MMT Act if all the following conditions are met:</p> <ul style="list-style-type: none"> <li>a) The MNE group has annual revenue of €750 million or more, as reported in the CFS of the UPE in at least two out of the four preceding FYs; and</li> <li>b) The MNE group has at least one CE or a JV located in Singapore, or at least one Reverse Hybrid Entity that is incorporated or registered in Singapore.</li> </ul> <p>The first FY is one that commences on or after 1 Jan 2025, and is the FY being tested to determine whether MTT and DTT will apply to the MNE group for that FY, based on the annual revenue threshold of EUR 750 million*, such as:</p> <table border="1" data-bbox="449 1102 1295 1432"> <thead> <tr> <th data-bbox="449 1102 767 1170">FYE</th><th data-bbox="767 1102 1295 1170">Tested FY</th></tr> </thead> <tbody> <tr> <td data-bbox="449 1170 767 1237">31 Dec</td><td data-bbox="767 1170 1295 1237">01/01/2025 to 31/12/2025</td></tr> <tr> <td data-bbox="449 1237 767 1304">31 Mar</td><td data-bbox="767 1237 1295 1304">01/04/2025 to 31/03/2026</td></tr> <tr> <td data-bbox="449 1304 767 1372">30 Jun</td><td data-bbox="767 1304 1295 1372">01/07/2025 to 30/06/2026</td></tr> <tr> <td data-bbox="449 1372 767 1432">30 Sep</td><td data-bbox="767 1372 1295 1432">01/10/2025 to 30/09/2026</td></tr> </tbody> </table> <p>The FY is based on the accounting period of the UPE's CFS. For example, if the UPE's CFS FYE is 31 Dec, the start and end dates of the first FY during which the MNE group is liable for registration are 1 Jan 2025 and 31 Dec 2025, respectively.</p> <p><i>* An MNE group is liable for registration under the MMT Act if the group's annual revenue is EUR 750 million or more in the CFS of the UPE in at least two out of the four preceding FYs of the tested FY.</i></p>	FYE	Tested FY	31 Dec	01/01/2025 to 31/12/2025	31 Mar	01/04/2025 to 31/03/2026	30 Jun	01/07/2025 to 30/06/2026	30 Sep	01/10/2025 to 30/09/2026
FYE	Tested FY										
31 Dec	01/01/2025 to 31/12/2025										
31 Mar	01/04/2025 to 31/03/2026										
30 Jun	01/07/2025 to 30/06/2026										
30 Sep	01/10/2025 to 30/09/2026										
<p><b>Is the deemed consolidation test applicable to the MNE group?</b></p>	<p>The deemed consolidation test is not applicable to a MNE group if its UPE prepares CFS. Please indicate “<b>No</b>” for this section if this is the case.</p> <p>On the other hand, if the UPE does not prepare the CFS, please indicate “<b>Yes</b>” that the deemed consolidation test is applicable to the MNE Group. In such cases, the test determines whether a group of entities should be treated as a consolidated group for the purpose of applying the relevant rules under the MMT Act. To conduct this determination, the UPE must use CFS that would have been</p>										

	<p>prepared as if it were required by the law or a regulatory body of the jurisdiction in which it is located to do so in accordance with an authorised financial accounting standard that is either an acceptable financial accounting standard or another financial accounting standard that is adjusted to prevent any material competitive distortion*.</p> <p>* Paragraph 2(d) of the <a href="#">First Schedule of the MMT Act</a> refers.</p>
<b>Is the MNE group a multi-parent group?</b>	<p>A Multi-Parent group refers to two or more groups whose UPEs enter into a formal arrangement that combines their businesses. A Multi-Parent group is treated as a single MNE group, notwithstanding the separate ownership structure of the different groups.</p> <p>For multi-parent groups, details of all UPEs must be provided in the registration form, with a maximum of 3 UPEs allowed. If there are more than 3 UPEs, please email the registered name, TIN, and jurisdiction of each additional UPE (starting from the fourth) to <a href="mailto:IRAS_PillarTwo_Compliance@iras.gov.sg">IRAS PillarTwo Compliance@iras.gov.sg</a>.</p> <p><i>Please refer to Section 2(1) of the <a href="#">MMT Act</a> for the definition of multi-parent group, and Part 7A of the <a href="#">Multinational Enterprise (Minimum Tax) Regulations 2024</a> ("MMT Regulations") for more information on multi-parent groups.</i></p>
<b>Tax identification number ("TIN") of UPE</b>	<p><b>If the UPE is located in Singapore:</b> Enter the UPE's Unique Entity Number (UEN) issued by Accounting and Corporate Regulation Authority or the ASGD number issued by IRAS if the UPE is a foreign-incorporated entity.</p> <p><b>If the UPE is located in a foreign jurisdiction:</b> Enter the TIN of the UPE provided in the GIR that was submitted to the relevant tax authority.</p>
<b>Name of UPE</b>	<p>The name of the UPE should match the name to be provided / provided in the GIR.</p>
<b>Jurisdiction in which UPE is located</b>	<p>Where a UPE is not a flow-through entity, it is located in a jurisdiction if:</p> <ul style="list-style-type: none"> <li>a) it is a tax resident of that jurisdiction based on its place of management, establishment, formation, incorporation, registration or similar criteria under the laws of that jurisdiction; or</li> <li>b) in a case where it is not a tax resident of any jurisdiction — it is established, formed, incorporated or registered under the laws of that jurisdiction.</li> </ul> <p>Where a UPE is a flow-through entity, it is located in the jurisdiction under the laws of which it is established, formed, incorporated or registered.</p> <p><i>Please refer to Section 5 of the <a href="#">MMT Act</a> for more details.</i></p>
<b>Type of FYE</b>	<p>FYE refers to the last day of the accounting period of the CFS. There are two types of FYE: (a) 12-month FYE; and (b) 52/53-week FYE.</p> <p>A 12-month FYE ends on a specific date (e.g. 31 Dec or 15 Jun), whereas a 52/53-week FYE ends on a specific day of the week (e.g. last Fri of Dec).</p> <p><u><a href="#">Example 1</a></u></p>

	<p>An MNE group has a 12-month FYE with an accounting period from 1 Jan 2025 to 31 Dec 2025. In the registration form, please indicate as follows:</p> <ul style="list-style-type: none"> <li>• Type of FYE → Enter “12-month FYE”</li> <li>• Month → Enter “Dec”</li> <li>• Date – dd (1 to 31) → Enter “31”</li> </ul> <p><u>Example 2</u></p> <p>An MNE group has a 12-month FYE with an accounting period from 16 Jun 2025 to 15 Jun 2026. In the registration form, please indicate as follows:</p> <ul style="list-style-type: none"> <li>• Type of FYE → Enter “12-month”</li> <li>• Month → Enter “Jun”</li> <li>• Date – dd (1 to 31) → Enter “15”</li> </ul> <p><u>Example 3</u></p> <p>An MNE group has a 52/53-week FYE with an accounting period that ends on the last Sat of Dec (i.e. 29 Dec 2025 to 27 Dec 2026). In the registration form, please indicate as follows:</p> <ul style="list-style-type: none"> <li>• Type of FYE → Enter “52/53-week FYE”</li> <li>• 52/53-week FYE → Enter “Last day of the month”</li> <li>• Day of the week → Enter “Sat”</li> <li>• Month → Enter “Dec”</li> </ul> <p><u>Example 4</u></p> <p>An MNE group has a 52/53-week FYE with an accounting period that ends on the Saturday that is nearest to 31 Dec (i.e. 29 Dec 2025 – 3 Jan 2027). In the registration form, please indicate as follows:</p> <ul style="list-style-type: none"> <li>• Type of FYE → Enter “52/53-week FYE”</li> <li>• 52/53-week FYE → Enter “Day of the week nearest to a specified date”</li> <li>• Day of the week → Enter “Sat”</li> <li>• Specified month → Enter “Dec”</li> <li>• Specified date – dd (1 to 31) → Enter “31”</li> </ul>
<b>Is registration for MTT in Singapore required for the MNE group?</b>	<p>MTT applies to a Singapore parent entity’s ownership interest in its relevant entities outside Singapore and its stateless entities but does not apply to its ownership interest in its entities located in Singapore.</p> <p>An MNE group is required to register for MTT in Singapore if it has a parent entity located in Singapore that meets the definition of a responsible member under the MMT Act.</p>
<b>Details of the Responsible Members of the MNE group</b>	<p>This section applies only if the MNE group is required to register for MTT in Singapore. Details of all parent entities which are responsible members and located in Singapore should be provided.</p> <p>A responsible member of an MNE group is any of the following entities located in Singapore or subject to a qualified IIR in the jurisdiction where it is located:</p> <ol style="list-style-type: none"> <li>a) the UPE of the MNE group and is not an excluded entity;</li> </ol>

	<p>b) an intermediate parent entity of the MNE group if no other member of the MNE group that owns a controlling interest in the entity is a responsible member (e.g. the UPE); or</p> <p>c) a partially-owned parent entity of the MNE group if it is not wholly-owned by another partially-owned parent entity of the MNE group that is a responsible member.</p> <p>When an intermediate parent entity is identified as a responsible member, please ensure the conditions specified in Section 13(2) of the MMT Act are satisfied. For partially-owned parent entities identified as responsible members, it is also necessary to satisfy the conditions specified in Section 13(3) of the MMT Act.</p>
<b>Reason(s) why MTT registration is not required</b>	<p>Examples of possible reasons include:</p> <ul style="list-style-type: none"> <li>a) The MNE group does not have a parent entity with foreign subsidiaries in Singapore.</li> <li>b) The MTT is disallowed by an IIR from a foreign jurisdiction. In such cases, please provide detailed information regarding the relevant foreign jurisdiction and the TIN and name of the associated foreign parent entity.</li> </ul>
<b>DFE / GFE</b>	<p>The MNE group is required to designate the same Singapore CE to be the DFE and GFE to fulfil tax obligations in Singapore. The rules in determining the DFE and GFE of an MNE group are explained in the <a href="#">IRAS e-Tax Guide - MTT and DTT</a>.</p>
<b>In-scope Entities</b>	<p>In-scope entities for DTT refer to the following categories of entities or connected to an MNE group:</p> <ul style="list-style-type: none"> <li>a) the CEs (including permanent establishments and partially owned CEs) of the MNE group located in Singapore;</li> <li>b) JVs and JV subsidiaries located in Singapore;</li> <li>c) members of a minority-owned sub-group, and minority-owned CEs located in Singapore; and</li> <li>d) RHEs which are: <ul style="list-style-type: none"> <li>i. formed, registered or incorporated in Singapore; and</li> <li>ii. not responsible members.</li> </ul> </li> </ul> <p>Please provide details of all CEs located in Singapore, including parent entities. The details of each parent entity must be provided, regardless whether it is a responsible member under the MMT Act.</p> <p>If the MNE Group has over 30 in-scope entities, instead of entering the details line by line, please use the <a href="#">template for more than 30 in-scope entities</a> and attach the completed template in the registration form.</p>

<b>EEs located in Singapore</b>	<p>An EE is not subject to the MTT and DTT. For more information on EEs, please refer to Module 1 of the e-learning slides (<a href="#">e-Learning on Global Anti-Base Erosion (GloBE) Rules and Domestic Top-up Tax (DTT)</a>).</p> <p>A filing entity may elect not to treat an EE as an EE in the GIR. Under this five-year election, the EE is to be treated as a CE for GloBE purposes. For EEs where the filing entity has elected or will be electing not to treat them as EEs in the GIR, such entities are to be included in the list of in-scope entities.</p> <p>If the MNE group has over 30 EEs, instead of entering the details line by line, please use the <a href="#">template for more than 30 excluded entities</a> and attach the completed template in the registration form.</p>
<b>Will the GIR under section 40 of the MMT Act be filed with the IRAS or with a competent authority in another jurisdiction that has an information exchange agreement with Singapore?</b>	<p>A GIR is required to be filed with the IRAS unless it is filed centrally by the MNE group with a competent authority in another jurisdiction and Singapore receives the relevant information through an exchange of information. In such cases, a GIR notification is submitted instead of the GIR.</p>
<b>Singapore-Incorporated or Registered Entities that Changed Tax Residency after 30 November 2021</b>	<p>For Singapore tax purposes, a company is a tax resident if the control and management of its business is exercised in Singapore.</p> <p>If there are more than 30 CEs that have shifted their tax residency overseas after 30 November 2021, please email the TIN, jurisdiction of tax residency, and date of change in tax residency for each additional CE (starting from the 31st onwards) to <a href="mailto:IRAS_PillarTwo_Compliance@iras.gov.sg">IRAS PillarTwo Compliance@iras.gov.sg</a>.</p> <p><i>For more details on tax residency, please refer to IRAS website → <a href="#">Tax Residency of a Company/ Certificate of Residence</a></i></p>
<b>Is the authorised person acting as a representative of the UPE?</b>	<p>If the authorised person is an officer of the UPE, please ensure the person submitting the form is a Director or a senior officer (such as CEO, Financial Controller or Vice President) of the UPE.</p> <p>If the authorised person is acting as a representative of the UPE, the person may be either a CE of the MNE group located in Singapore or a local tax agent. In addition, a Letter of Authorisation must be attached.</p>
<b>Appointment of DFE to file DTT return, and GFE to file GIR or GIR Notification in Singapore</b>	<p>The designation of DFE and GFE of an MNE group must be made by the UPE of the MNE group, on behalf of the following entities:</p> <ul style="list-style-type: none"> <li>a) all the CEs located in Singapore of the MNE group;</li> <li>b) all joint ventures and JV subsidiaries located in Singapore and connected to the MNE group; and</li> <li>c) all flow-through entities established, formed, incorporated or registered under the laws of Singapore that are not a responsible member and are</li> </ul>

	reverse hybrid entities with respect to any of its income, expenditure, profit or loss.
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The above information is intended for better general understanding and is not intended to comprehensively address all possible issues that may arise. While every effort has been made to ensure that the above information is consistent with existing policies and practice, should there be any changes, IRAS reserves the right to vary its position accordingly. For the latest information on the registration process, please refer to IRAS' website on [Registration for Multinational Enterprise Top-up Tax and Domestic Top-up Tax](#).