OECD/G20 BASE EROSION AND PROFIT SHIFTING PROJECT

Tax Challenges Arising from the Digitalisation of the Economy – GloBE Information Return (Pillar Two)

Inclusive Framework on BEPS

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3.2.1.1 Computation of GloBE Income (Loss)

		Net amount
1. Aggregate FANIL amount after allocations in Articles 3.4 and 3.5 (All CEs in the jurisdiction)		
2. 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)	

(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)	

(a) High-level summary

1.	Deferred tax expense amount	[A]
2.	Recasting the deferred tax expense to the Minimum Rate - Article 4.4.1, where:	[B] = [C] + [D]
3.	The recast is an increase of the deferred tax asset recorded at a lower tax rate than the Minimum Rate	[C]
4.	The recast relates to the deferred tax expense recorded at a higher tax rate than the Minimum Rate	[D]
5.	Total amount of the adjustments	[E]
6.	Total Deferred Tax Adjustment Amount	[F] = [A] + [E]

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]

3.2.1.1 GloBE Income

Commercial P&L

Sales	1000
COGS	-200
Gross profit	800
Pensions employees	-100
Fines	-50
Other OPEX	-500
Operating profit	150
Interest	-50
Dividends	50
Gain from sale of subsidiaries	100
Earnings Before Tax	250
Current Tax (20%)	-20
Deferred Tax	-10
Net Profit	220

Commercial P&L (upside down)

Net Profit (FANIL)	220
Deferred Tax	-10
Current Tax (20%)	-20
Earnings Before Tax	250
Gain from sale of subsidiaries	100
Dividends	50
Interest	-50
Operating profit	150
Other OPEX	-500
Fines	-50
Pensions employees	-100
Gross profit	800
COGS	-200
Sales	1000

3.2.1.1 GloBE Income

Commercial P&L (upside down)	
Net Profit (FANIL)	220
Deferred Tax	-10
Current Tax (20%)	-20
Earnings Before Tax	250
Gain from sale of subsidiaries	100
Dividends	50
Interest	-50
Operating profit	150
Other OPEX	-500
Fines	-50
Pensions employees	-100
Gross profit	800
COGS	-200
Sales	1000

GloBE Income	
Net Profit (FANIL)	220
Deferred Tax	+10
Current Tax (20%)	+20
Gain from sale of subsidiaries	-100
Dividends	-50
Interest (ALP)	+15
Fines	+50
Pensions employees	+10
GloBE Income (GloBE EBT)	175

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	

		Net amount
(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 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		

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.

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1. We need an ETR of 15% not to pay top-up tax

2. We need to calculate the rate on taxes we already provided for on our GloBE Income. This means:
   1. Adding up all taxes already include in our FANIL (above & below EBT)

   2. Adding any Adjusted Covered Taxes that are not in our FANIL

   3. Taking out any taxes on FANIL that is not GloBE income

   4. Including GloBE Deferred Taxes

3.2.1.2 Computation of Adjusted Covered Taxes

(a) Total amount of Adjusted Covered Taxes

1. Aggregate Current tax expense with respect to Covered Taxes after allocations in Article 4.3 (All CEs in the jurisdiction)

(a) Covered Tax accrued as an expense in the profit before taxation in the financial accounts - Article 4.1.2 (a)

(f) Current tax expense on income excluded from GloBE Income or Loss – Article 4.1.3 (a)

(i) Current tax expense related to uncertain tax position– Article 4.1.3 (d)

(l) Covered Taxes relating to Net Asset Gain or Net Asset Loss – Article 3.2.6

(q) Total Deferred Tax Adjustment Amount – Article 4.1.1(b)

1. We need an ETR of 15% not to pay top-up tax

2. We need to calculate the rate on taxes we already provided for on our GloBE Income. This means:
   1. Adding up all taxes already include in our FANIL (above & below EBT)

   2. Adding any Adjusted Covered Taxes that are not in our FANIL

   3. Taking out any taxes on FANIL that is not GloBE income

   4. Including GloBE Deferred Taxes

3.2.1.2 Computation of Adjusted Covered Taxes

(a) Total amount of Adjusted Covered Taxes

1. Aggregate Current tax expense with respect to Covered Taxes after allocations in Article 4.3 (All CEs in the jurisdiction)

(a)   Covered Tax accrued as an expense in the profit before taxation in the financial accounts - Article 4.1.2 (a)

(f)   Current tax expense on income excluded from GloBE Income or Loss – Article 4.1.3 (a)

(i)   Current tax expense related to uncertain tax position– Article 4.1.3 (d)

(l)   Covered Taxes relating to Net Asset Gain or Net Asset Loss – Article 3.2.6

(q)   Total Deferred Tax Adjustment Amount – Article 4.1.1(b)

3.2.1.2 Computation of Adjusted Covered Taxes

(a) Total amount of Adjusted Covered Taxes

1. Aggregate Current tax expense with respect to Covered Taxes after allocations in Article 4.3 (All CEs in the jurisdiction)

The Aggregate Current tax expense after allocations is:

Current taxes from CE FANIL

± Covered Taxes on PE income (add to PE CTs, take out of HQ CTs) (art. 3.4.2.a)

± CTs in Tax Transparent Entity FANIL (add to transparent entity owners) (art. 3.4.2.b)

± CTs on CFC Tax Regime (add to CFC CE FANIL, take out of owner FANIL) (art. 3.4.2.c)

± CTs on Hybrid Entities (add to FANIL hybrid, take out of owner hybrid) (art. 3.4.2.d)

± CTs on profit distributions (add Div WHT to FANIL distributor, take out of FANIL shareh.) (3.4.2.e)

3.2.4.2 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

1. We need an ETR of 15% not to pay top-up tax

2. We need to calculate the rate on taxes we already provided for on our GloBE Income. This means:

   1. Adding up all taxes already include in our FANIL (above & below EBT)

   2. Adding any Adjusted Covered Taxes that are not in our FANIL

   3. Taking out any taxes on FANIL that is not GloBE income

   4. Including GloBE Deferred Taxes

3.2.1.2 Computation of Adjusted Covered Taxes

(a) Total amount of Adjusted Covered Taxes

1. Aggregate Current tax expense with respect to Covered Taxes after allocations in Article 4.3 (All CEs in the jurisdiction)

(a)   Covered Tax accrued as an expense in the profit before taxation in the financial accounts - Article 4.1.2 (a)

(c)   Covered Taxes for uncertain tax position recorded as a reduction to Covered Taxes in prior year – Article 4.1.2 (c)

(f)   Current tax expense on income excluded from GloBE Income or Loss – Article 4.1.3 (a)

(i)   Current tax expense related to uncertain tax position– Article 4.1.3 (d)

(l)   Covered Taxes relating to Net Asset Gain or Net Asset Loss – Article 3.2.6

(q)   Total Deferred Tax Adjustment Amount – Article 4.1.1(b)

1. We need an ETR of 15% not to pay top-up tax

2. We need to calculate the rate on taxes we already provided for on our GloBE Income. This means:
   1. Adding up all taxes already include in our FANIL (above & below EBT)

   2. Adding any Adjusted Covered Taxes that are not in our FANIL

   3. Taking out any taxes on FANIL that is not GloBE income

   4. Including GloBE Deferred Taxes

3.2.1.2 Computation of Adjusted Covered Taxes

(a) Total amount of Adjusted Covered Taxes

1. Aggregate Current tax expense with respect to Covered Taxes after allocations in Article 4.3 (All CEs in the jurisdiction)

(a) Covered Tax accrued as an expense in the profit before taxation in the financial accounts - Article 4.1.2 (a)

(c) Covered Taxes for uncertain tax position recorded as a reduction to Covered Taxes in prior year – Article 4.1.2 (c)

(f) Current tax expense on income excluded from GloBE Income or Loss – Article 4.1.3 (a)

(i) Current tax expense related to uncertain tax position– Article 4.1.3 (d)

(l) Covered Taxes relating to Net Asset Gain or Net Asset Loss – Article 3.2.6

(q) Total Deferred Tax Adjustment Amount – Article 4.1.1(b)

1. We need an ETR of 15% not to pay top-up tax

2. We need to calculate the rate on taxes we already paid on our GloBE Income. This means:

   1. Adding up all taxes already include in our FANIL (above & below EBT)

   2. Adding any Adjusted Covered Taxes that are not in our FANIL

   3. Taking out any taxes on FANIL that is not GloBE income

   4. Including GloBE Deferred Taxes

3.2.1.2 Computation of Adjusted Covered Taxes

(a) Total amount of Adjusted Covered Taxes

1. Aggregate Current tax expense with respect to Covered Taxes after allocations in Article 4.3 (All CEs in the jurisdiction)

(a) Covered Tax accrued as an expense in the profit before taxation in the financial accounts - Article 4.1.2 (a)

(f) Current tax expense on income excluded from GloBE Income or Loss – Article 4.1.3 (a)

(i) Current tax expense related to uncertain tax position– Article 4.1.3 (d)

(l) Covered Taxes relating to Net Asset Gain or Net Asset Loss – Article 3.2.6

(q) Total Deferred Tax Adjustment Amount – Article 4.1.1(b)

(q) Total Deferred Tax Adjustment Amount – Article 4.1.1.(b)

1. Certain movements in deferred tax assets and liabilities go through the P&L (e.g. Tax assets on current losses; or tax liabilities on accelerated depreciation)

2. Those start with movements in the FANIL

   1. Adjusted up or down to 15% tax

3. Which must then be adjusted further

   1. Movements excl. from GloBE Income

   2. Changes in domestic tax rates

4. To come to at total Defered Tax adj.
5. Which feeds back into the GloBE Inc.

3.2.2.1 Deferred Tax adjustments

(a) High-level summary

1.	Deferred tax expense amount	[A]
2.	Recasting the deferred tax expense to the Minimum Rate - Article 4.4.1, where:	[B] = [C] + [D]
3.	The recast is an increase of the deferred tax asset recorded at a lower tax rate than the Minimum Rate	[C]
4.	The recast relates to the deferred tax expense recorded at a higher tax rate than the Minimum Rate	[D]
5.	Total amount of the adjustments	[E]

(b) Breakdown of the adjustments

1.	Adjustments to deferred tax expense	
(a)	Deferred tax expense related to items excluded from GloBE Income or Loss – Article 4.4.1 (a)	
(e)	Deferred tax expense arising from a re-measurement related to changes in the tax rate – Article 4.4.1 (d)	
2.	Total amount of the adjustments	[E]

6.	Total Deferred Tax Adjustment Amount	[F] = [B] +/- [E]
(q)	Total Deferred Tax Adjustment Amount – Article 4.1.1(b)	

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]

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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]

2.2.1.2 Permanent safe harbours

(a) Simplified Calculation for Non-material Constituent Entities

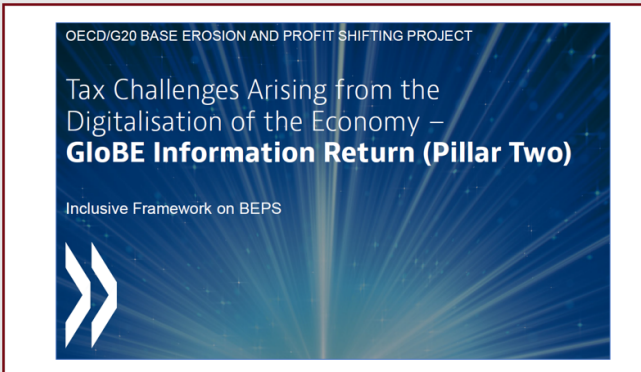|		1. Total Revenue of all NMCEs in the jurisdiction	2. Aggregate Simplified Tax of all NMCEs in the jurisdiction
a.	Reporting Fiscal Year		
b.	1st preceding Fiscal Year (if applicable)		n.a.
c.	2nd preceding Fiscal Year (if applicable)		n.a.
d.	Average of the three Fiscal Years (if applicable)		n.a.

2.2.1 Safe harbour jurisdiction electi...

Note 2.2.1: where a safe harbour reduces t...
Groups, the Filing Constituent Entity shall...
Constituent Entities or members of JV Grou...

2.2.1.1 Safe harbour election

Note 2.2.1.1.1: the Filing Constituent Entity...
An MNE Group that qualifies for more than...
The Filing Constituent Entity shall select the...
(b) permanent safe harbour – ETR test; (c)...
harbour; (e) Transitional CbCR Safe Harb...
Simplified ETR test; (g) Transitional CbCR...
safe harbour. The Filing Constituent Entity...
Reporting Fiscal Year if it did not elect to a...
(g) for the preceding Reporting Fiscal Year...
jurisdiction, in accordance with the agreed...

Note 2.2.1.1.1: If option (a), (b) or (c) is sele...
GloBE calculations, the Filing Constituent E...
not covered by the Simplified Calculations.

Note 2.2.1.1.1: If option (a), (b) or (c) is sel...
JV Groups in the subgroup identified in...
Constituent Entity shall also complete Se...
located in the safe harbour jurisdiction as p...

1 MNE Group Information

1.2 MNE Group General Information – .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)

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.

Art. 10 Def. Consolidated Financial Statements:
(a) the financial statements prepared by an Entity in accordance with an Acceptable Financial Accounting Standard, in which the assets, liabilities, income, expenses and cash flows of that Entity and the Entities in which it has a Controlling Interest are presented as those of a single economic unit;

(b) where an Entity meets the definition of a Group under Article 1.2.3, the financial statements of the Entity that are prepared in accordance with an Acceptable Financial Accounting Standard;

(c) where the Ultimate Parent Entity has financial statements described in paragraph (a) or (b) that are not prepared in accordance with an Acceptable Financial Accounting Standard, the financial statements are those that have been prepared subject to adjustments to prevent any Material Competitive Distortions; and

(d) where the Ultimate Parent Entity does not prepare financial statements described in the paragraphs above, the Consolidated Financial Statements of the Ultimate Parent Entity are those that would have been prepared if such Entity were required to prepare such statements 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 Distortions.

1.3 Corporate Structure – 1. UPE

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

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 1.3.1.1.1: 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.

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P2: GLoBE Info Tree

Main	Sub-1
1 MNE Group Information	1.1 Identification of the Filing Constituent Entity
1 MNE Group Information	1.2 MNE Group General Information
1 MNE Group Information	1.3 Corporate Structure
1 MNE Group Information	1.4 High-level summary of GloBE Information
2 Jurisdictional Safe Harbours and Exclusions	2.1 Characteristics of the jurisdiction
2 Jurisdictional Safe Harbours and Exclusions	2.2 Jurisdictional exceptions applicable in respect of this jurisdiction (Top-up Tax reduced to zero)
2 Jurisdictional Safe Harbours and Exclusions	2.3 MNE Group in the initial phase of international activity (if applicable)
3 GloBE Computations	3.1 Characteristics of the jurisdiction
3 GloBE Computations	3.2 ETR computation
3 GloBE Computations	3.2 ETR computation
3 GloBE Computations	3.2 ETR computation
3 GloBE Computations	3.3 Top-up Tax computation
3 GloBE Computations	3.4 Top-up Tax allocation and attribution (if any)

P2: GLoBE Info Tree

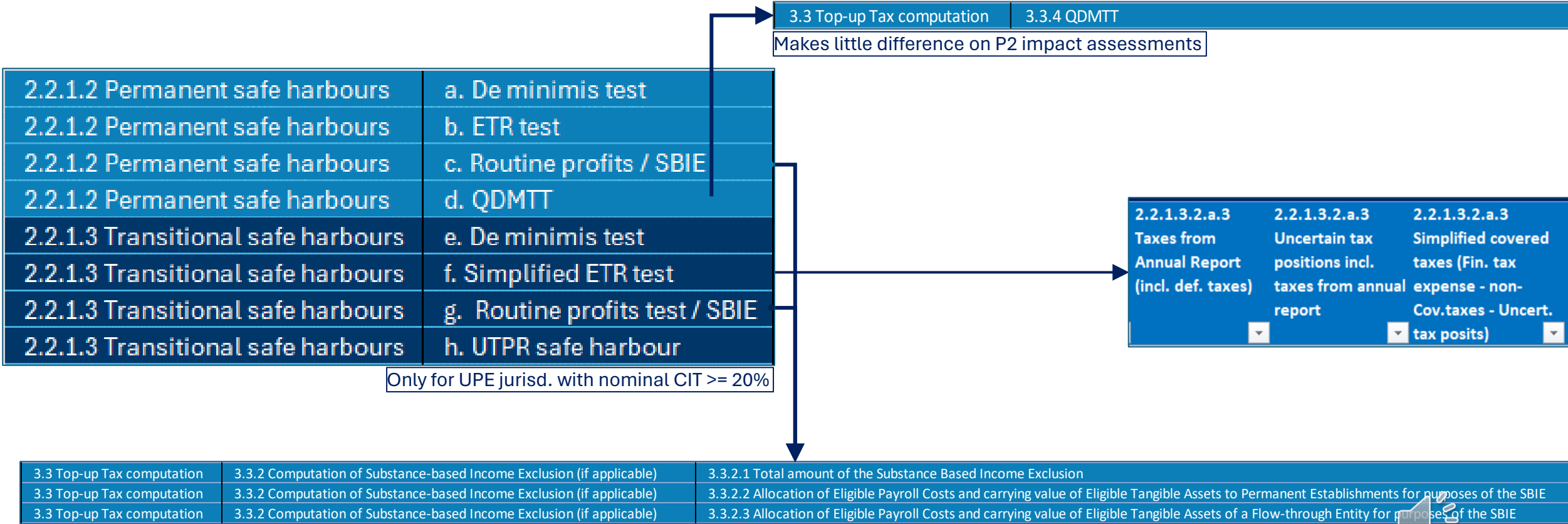| Main	Sub-1	Sub-2	Sub-3	Sub-4
1 MNE Group Information	1.1 Identification of the Filing Constituent Entity			
1 MNE Group Information	1.2 MNE Group General Information	1.2.1 MNE Group and Reporting Fiscal Year		
1 MNE Group Information	1.2 MNE Group General Information	1.2.2 MNE General accounting information		
1 MNE Group Information	1.3 Corporate Structure	1.3.1 Ultimate Parent Entity		
1 MNE Group Information	1.3 Corporate Structure	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	
1 MNE Group Information	1.3 Corporate Structure	1.3.2 Group Entities (other than the UPE) and members of JV Groups	1.3.2.2 Excluded Entities	
1 MNE Group Information	1.3 Corporate Structure	1.3.3 Changes in the corporate structure that occurred during the Reporting Fiscal Year		
1 MNE Group Information	1.4 High-level summary of GloBE Information			
2 Jurisdictional Safe Harbours and Exclusions	2.1 Characteristics of the jurisdiction			
2 Jurisdictional Safe Harbours and Exclusions	2.2 Jurisdictional exceptions applicable in respect of this ju	2.2.1 Safe harbour jurisdiction election	2.2.1.1 Safe harbour election	
2 Jurisdictional Safe Harbours and Exclusions	2.2 Jurisdictional exceptions applicable in respect of this ju	2.2.1 Safe harbour jurisdiction election	2.2.1.2 Permanent safe harbours	(a) Simplified Calculation for Non-material Constituent Entities
2 Jurisdictional Safe Harbours and Exclusions	2.2 Jurisdictional exceptions applicable in respect of this ju	2.2.1 Safe harbour jurisdiction election	2.2.1.3 Transitional safe harbours	(a) Transitional CbCR safe harbour
2 Jurisdictional Safe Harbours and Exclusions	2.2 Jurisdictional exceptions applicable in respect of this ju	2.2.1 Safe harbour jurisdiction election	2.2.1.3 Transitional safe harbours	(b) Transitional UTPR safe harbour
2 Jurisdictional Safe Harbours and Exclusions	2.2 Jurisdictional exceptions applicable in respect of this ju	2.2.2 Election for de minimis exclusion		
2 Jurisdictional Safe Harbours and Exclusions	2.3 MNE Group in the initial phase of international activity (if applicable)			
3 GloBE Computations	3.1 Characteristics of the jurisdiction			
3 GloBE Computations	3.2 ETR computation	3.2.1 ETR	3.2.1.1 Computation of GloBE Income (Loss)	
3 GloBE Computations	3.2 ETR computation	3.2.1 ETR	3.2.1.2 Computation of Adjusted Covered Taxes	(a) Total amount of Adjusted Covered Taxes
3 GloBE Computations	3.2 ETR computation	3.2.1 ETR	3.2.1.2 Computation of Adjusted Covered Taxes	(b) Excess Negative Tax Expense Carry-forward
3 GloBE Computations	3.2 ETR computation	3.2.1 ETR	3.2.1.2 Computation of Adjusted Covered Taxes	(c) Transitional Blended CFC Regime calculation (if any)
3 GloBE Computations	3.2 ETR computation	3.2.2 Jurisdictional computations relating to deferred tax accounting	3.2.2.1 Deferred Tax adjustments	(a) High-level summary
3 GloBE Computations	3.2 ETR computation	3.2.2 Jurisdictional computations relating to deferred tax accounting	3.2.2.1 Deferred Tax adjustments	(b) Breakdown of the adjustment
3 GloBE Computations	3.2 ETR computation	3.2.2 Jurisdictional computations relating to deferred tax accounting	3.2.2.1 Deferred Tax adjustments	(c) Loss carry backs
3 GloBE Computations	3.2 ETR computation	3.2.2 Jurisdictional computations relating to deferred tax accounting	3.2.2.2 Recapture mechanism	
3 GloBE Computations	3.2 ETR computation	3.2.2 Jurisdictional computations relating to deferred tax accounting	3.2.2.3 Transition rules	(a) Application of Article 9.1.1 and 9.1.2.
3 GloBE Computations	3.2 ETR computation	3.2.2 Jurisdictional computations relating to deferred tax accounting	3.2.2.3 Transition rules	(b) Application of Article 9.1.3.
3 GloBE Computations	3.2 ETR computation	3.2.3 Jurisdictional elections (if any)	3.2.3.1 Jurisdictional elections (other than Article 7.3.1)	(a) Elections
3 GloBE Computations	3.2 ETR computation	3.2.3 Jurisdictional elections (if any)	3.2.3.1 Jurisdictional elections (other than Article 7.3.1)	(b) Information requirements related to jurisdictional elections
3 GloBE Computations	3.2 ETR computation	3.2.3 Jurisdictional elections (if any)	3.2.3.2 Election for Article 7.3.1	(a) Recapture mechanism for Article 7.3
3 GloBE Computations	3.2 ETR computation	3.2.3 Jurisdictional elections (if any)	3.2.3.2 Election for Article 7.3.1	(b) Application of Article 7.3.7
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	(a) Election for the transitional simplified jurisdictional reporting framework	
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	(b) Aggregated Reporting for Tax Consolidated Groups	
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	3.2.4.1 GloBE Income or Loss	(a) Adjustments to the Financial Accounts Net Income or Loss
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	3.2.4.1 GloBE Income or Loss	(b) Cross-border allocation of income or loss between a Main Ent
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	3.2.4.1 GloBE Income or Loss	(c) Cross-border adjustments
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	3.2.4.1 GloBE Income or Loss	(d) Adjustments to the GloBE Income of the UPE under Article 7.1
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	3.2.4.2 Adjusted Covered taxes	(a) Adjustments to the Current tax expense in the Financial Accou
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	3.2.4.2 Adjusted Covered taxes	(b) Cross allocation of taxes
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	3.2.4.2 Adjusted Covered taxes	(c) Deferred tax expense
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	3.2.4.3 Constituent Entity elections (or elections that apply to a	
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	3.2.4.4 International shipping income exclusion	(a) International shipping income exclusion
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	3.2.4.4 International shipping income exclusion	(b) Jurisdictional cap for the qualified ancillary international shipp
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	3.2.4.5 Information for purposes of Article 7.6 (if applicable)	
3 GloBE Computations	3.2 ETR computation	3.2.4 Constituent Entity Computations	3.2.4.6 Other Accounting Standard	
3 GloBE Computations	3.3 Top-up Tax computation	3.3.1 Top-up Tax		
3 GloBE Computations	3.3 Top-up Tax computation	3.3.2 Computation of Substance-based Income Exclusion (if applicable)	3.3.2.1 Total amount of the Substance Based Income Exclusion	
3 GloBE Computations	3.3 Top-up Tax computation	3.3.2 Computation of Substance-based Income Exclusion (if applicable)	3.3.2.2 Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets to Permanent Establishments for purposes o
3 GloBE Computations	3.3 Top-up Tax computation	3.3.2 Computation of Substance-based Income Exclusion (if applicable)	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
3 GloBE Computations	3.3 Top-up Tax computation	3.3.3 Additional Current Top-up Tax	3.3.3.1 Additional Current Top-up Tax for purposes other than A
3 GloBE Computations	3.3 Top-up Tax computation	3.3.3 Additional Current Top-up Tax	3.3.3.2 Additional Current Top-up Tax for purposes of Article 4.1
3 GloBE Computations	3.3 Top-up Tax computation	3.3.4 QDMTT		
3 GloBE Computations	3.4 Top-up Tax allocation and attribution (if any)	3.4.1 Application of the IIR in respect of this jurisdiction		
3 GloBE Computations	3.4 Top-up Tax allocation and attribution (if any)	3.4.2 Total UTPR Top-up Tax amount in respect of this Jurisdiction		
3 GloBE Computations	3.4 Top-up Tax allocation and attribution (if any)	3.4.3 Attribution of Top-up Tax under the UTPR		

2 Jurisdictional Safe Harbours and Exclusions	2.1 Characteristics of the jurisdiction
2 Jurisdictional Safe Harbours and Exclusions	2.2 Jurisdictional exceptions applicable in respect of this jurisdiction (Top-up Tax reduced to zero)
2 Jurisdictional Safe Harbours and Exclusions	2.3 MNE Group in the initial phase of international activity (if applicable)

2.2.1.1 Safe harbour election	
2.2.1.2 Permanent safe harbours	(a) Simplified Calculation for Non-material Constituent Entities
2.2.1.3 Transitional safe harbours	(a) Transitional CbCR safe harbour
2.2.1.3 Transitional safe harbours	(b) Transitional UTPR safe harbour
2.2.2 Election for de minimis exclusion	

2.2.1.2 Permanent safe harbours	a. De minimis test
2.2.1.2 Permanent safe harbours	b. ETR test
2.2.1.2 Permanent safe harbours	c. Routine profits / SBIE
2.2.1.2 Permanent safe harbours	d. QDMTT
2.2.1.3 Transitional safe harbours	e. De minimis test
2.2.1.3 Transitional safe harbours	f. Simplified ETR test
2.2.1.3 Transitional safe harbours	g. Routine profits test / SBIE
2.2.1.3 Transitional safe harbours	h. UTPR safe harbour

3.3 Top-up Tax computation	3.3.4 QDMTT	

Makes little difference on P2 impact assessments

2.2.1.2 Permanent safe harbours	a. De minimis test
2.2.1.2 Permanent safe harbours	b. ETR test
2.2.1.2 Permanent safe harbours	c. Routine profits / SBIE
2.2.1.2 Permanent safe harbours	d. QDMTT
2.2.1.3 Transitional safe harbours	e. De minimis test
2.2.1.3 Transitional safe harbours	f. Simplified ETR test
2.2.1.3 Transitional safe harbours	g. Routine profits test / SBIE
2.2.1.3 Transitional safe harbours	h. UTPR safe harbour

Only for UPE jurisd. with nominal CIT >= 20%

2.2.1.3.2.a.3 Taxes from Annual Report (incl. def. taxes)	2.2.1.3.2.a.3 Uncertain tax positions incl. taxes from annual report	2.2.1.3.2.a.3 Simplified covered taxes (Fin. tax expense - non-Cov.taxes - Uncert. tax posits)

3.3 Top-up Tax computation	3.3.2 Computation of Substance-based Income Exclusion (if applicable)	3.3.2.1 Total amount of the Substance Based Income Exclusion
3.3 Top-up Tax computation	3.3.2 Computation of Substance-based Income Exclusion (if applicable)	3.3.2.2 Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets to Permanent Establishments for purposes of the SBIE
3.3 Top-up Tax computation	3.3.2 Computation of Substance-based Income Exclusion (if applicable)	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 SBIE

P2: 2.2.1 Safe harbour elections

3.3 Top-up Tax computation | 3.3.4 QDMTT

Makes little difference on P2 impact assessments

2.2.1.2 Permanent safe harbours	a. De minimis test
2.2.1.2 Permanent safe harbours	b. ETR test
2.2.1.2 Permanent safe harbours	c. Routine profits / SBIE
2.2.1.2 Permanent safe harbours	d. QDMTT
2.2.1.3 Transitional safe harbours	e. De minimis test
2.2.1.3 Transitional safe harbours	f. Simplified ETR test
2.2.1.3 Transitional safe harbours	g. Routine profits test / SBIE
2.2.1.3 Transitional safe harbours	h. UTPR safe harbour

2.2.1.3.2.a.3 Taxes from Annual Report (incl. def. taxes)	2.2.1.3.2.a.3 Uncertain tax positions incl. taxes from annual report	2.2.1.3.2.a.3 Simplified covered taxes (Fin. tax expense – non-Cov.taxes – Uncert. tax posits)

3.3.3.2 SBIE

3.3.2.1.1 Payroll costs (A)	3.3.2.1.2 Mark-up% (B)	3.3.2.1.3 Tangi. Assets (C)	3.3.2.1.4 Mark-up% (D)	3.3.2.1.5 SBIE (E=AXB + CxD)
1.248.532	10,0%	1.340.596.340	8,0%	107.372.560
86.533.824	10,0%	25.799.878	8,0%	10.717.373
32.269.852	10,0%	127.460.156	8,0%	13.423.798
35.976.876	10,0%	714.098.372	8,0%	60.725.557
328.743.904	10,0%	739.961.092	8,0%	92.071.278
41.365.038	10,0%	56.758	8,0%	4.141.044
21.549.424	10,0%	9.028.356	8,0%	2.877.211
59.881.614	10,0%	75.396.750	8,0%	12.019.901

GLoBE Income:

FANIL (Fin Accs Net Income / Loss	1,000
ADD: Net tax expense in Financial accs	250
LESS: Excluded dividends	-100
ADD: Fines	50
GLoBE Income	1,200

Adjusted Covered Taxes:

Covered Taxes in FANIL alloc. under 4'3	200
LESS: Div WHT on Excluded dividends (25%)	-25
LESS: Tax on uncertain tax positions	-55
Adjusted Covered Taxes	120
ETR: 120 / 1200 =	10%
Top-up tax rate: 15% - 10% =	5%
Payroll = 4000 (x10% =)	400
+ Tangi Assets 1250 (x8% =)	100
SBIE =	500
Excess Profit =	700
Top-up Tax (700 x 5% =)	35

3.2 ETR computation	3.2.1 ETR	3.2.1.1 Computation of GloBE Income (Loss)

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)			
(z) Transactions between Constituent Entities – Article 9.1.3			
4. GloBE Income (Loss) of the CE or member of JV Group			

3.2 ETR computation 1.a High level summary	3.2.1 Computation GloBE income				
3.2.1.a Fin. Account net income	(a) Net Taxes Expense - Article 3.2.1 (a)	(b) Excluded Dividends – Article 3.2.1 (b)	(c) Excluded Equity Gain/Loss – Art. 3.2.1 (c)	(z) InterCo transactions – Art. 9.1.3	2. Net GloBE Income (Loss) of the Jurisdiction
3.943.000	1.009.000				4.952.000

GLoBE Income:

FANIL (Fin Accs Net Income / Loss	1,000
ADD: Net tax expense in Financial accs	250
LESS: Excluded dividends	-100
ADD: Fines	50
GLoBE Income	1,200

Adjusted Covered Taxes:

Covered Taxes in FANIL alloc. under 4'3	200
LESS: Div WHT on Excluded dividends (25%)	-25
LESS: Tax on uncertain tax positions	-55
Adjusted Covered Taxes	120

ETR: 120 / 1200 =	10%
Top-up tax rate: 15% - 10% =	5%

Payroll = 4000 (x10% =)	400
+ Tangi Assets 1250 (x8% =)	100
SBIE =	500
Excess Profit =	700

Top-up Tax (700 x 5% =)	35

3.2.1 ETR	3.2.1.2 Computation of Adjusted Covered Taxes	(a) Total amount of Adjusted Covered Taxes

3.2.4.2 Adjusted Covered taxes

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

		Additions	Reductions
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			
(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		
(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)		
4. Adjusted Covered Taxes			

3.2.1.2 Adj. Covered taxes	3.2.1.2 Adj. Covered taxes				
1. Aggregate Covered Tax expense after art. 4.3	(a) Cov. Tax accrued as an expense in the profit before taxation in the financial accounts - Art. 4.1.2 (a)2	(b) GloBE Loss Deferred Tax Asset established under Art. 4.5.1 or used – Art. 4.1.2 (b) combined with Art. 4.5.3	(q) Total Deferred Tax Adjustment Amount – Art. 4.1.1(b)	(t) Decrease cov. tax by rest exc.Neg.tax cfwd	3. Adjusted Covered Taxes
1.009.000					1.009.000

GLoBE Income:

FANIL (Fin Accs Net Income / Loss	1,000
ADD: Net tax expense in Financial accs	250
LESS: Excluded dividends	-100
ADD: Fines	50
GLoBE Income	1,200

Adjusted Covered Taxes:

Covered Taxes in FANIL alloc. under 4'3	200
LESS: Div WHT on Excluded dividends (25%)	-25
LESS: Tax on uncertain tax positions	-55
Adjusted Covered Taxes	120

ETR: 120 / 1200 =	10%
Top-up tax rate: 15% - 10% =	5%

Payroll = 4000 (x10% =)	400
+ Tangi Assets 1250 (x8% =)	100
SBIE =	500
Excess Profit =	700

Top-up Tax (700 x 5% =)	35

3.2 ETR computation | **3.2.1 ETR** | **3.2.1.1 Computation of GloBE Income (Loss)**

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 ETR computation

3.2.1.a Fin. Account net income	3.2.1.b GloBE income (A)	3.2.1.c Income tax expense	3.2.1.d Adjusted covered taxes (B)	3.2.1.e ETR (C=B/A)
74.000	75.000	1.000	1.000	1,3%

GLoBE Income:

FANIL (Fin Accs Net Income / Loss	1,000
ADD: Net tax expense in Financial accs	250
LESS: Excluded dividends	-100
ADD: Fines	50
GLoBE Income	1,200

Adjusted Covered Taxes:

Covered Taxes in FANIL alloc. under 4'3	200
LESS: Div WHT on Excluded dividends (25%)	-25
LESS: Tax on uncertain tax positions	-55
Adjusted Covered Taxes	120

ETR: 120 / 1200 =	10%
Top-up tax rate: 15% - 10% =	5%

Payroll = 4000 (x10% =)	400
+ Tangi Assets 1250 (x8% =)	100
SBIE =	500
Excess Profit =	700
Top-up Tax (700 x 5% =)	35

3.2 ETR computation	3.2.1 ETR	3.2.1.1 Computation of GloBE Income (Loss)

3.3.1 Top-up Tax	
3.3.2 Computation of Substance-based Income Exclusion	3.3.2.1 Total amount of the Substance Based Income Exclusion

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]

3.2 ETR computation

3.2.1.a Fin. Account net income	3.2.1.b GloBE income (A)	3.2.1.c Income tax expense	3.2.1.d Adjusted covered taxes (B)	3.2.1.e ETR (C=B/A)
24.919.000	24.919.000	0	0	0,0%

3.3.3.1 Top-up Tax computation

3.3.1.a Top-up Tax % (A)	3.3.1.b SBIE excl (B)	3.3.1.c Excess profits (C=GLoBE inc - B)	3.3.1.d Addit. current Top-up Tax (D)	3.3.1.e QDMTT payable (E)	3.3.1.f Top-up Tax (AxC+D-E)
15,0%	5.833.400	19.085.600	0	0	2.862.840

Year 1:

Buy inventory cash for 150	Bank	-150		
	Inventory	150		
Sell all inventory for 50	Bank	50	P&L Sales	50
	Inventory	-150	P&L Cost of Sales	-150
Deferred tax asset (25% CIT)	Def Tax Asset	25	P&L	25

Year 2:

	Bank	-100	Ret. Earnings	-75
	Def Tax Asset	25		
Buy inventory cash for 50	Bank	-50		
	Inventory	50		
Sell all inventory for 150	Bank	150	P&L Sales	150
	Inventory	-50	P&L Cost of Sales	-50
Current tax (25%)			P&L Current tax	-25
			Current Tax due	25
Deferred tax asset (25% CIT)	Def Tax Asset	-25	Current Tax due	-25

Year 3:

| | Bank | 0 | Ret. Earnings | 0 |
| | Def Tax Asset | 0 | | |