

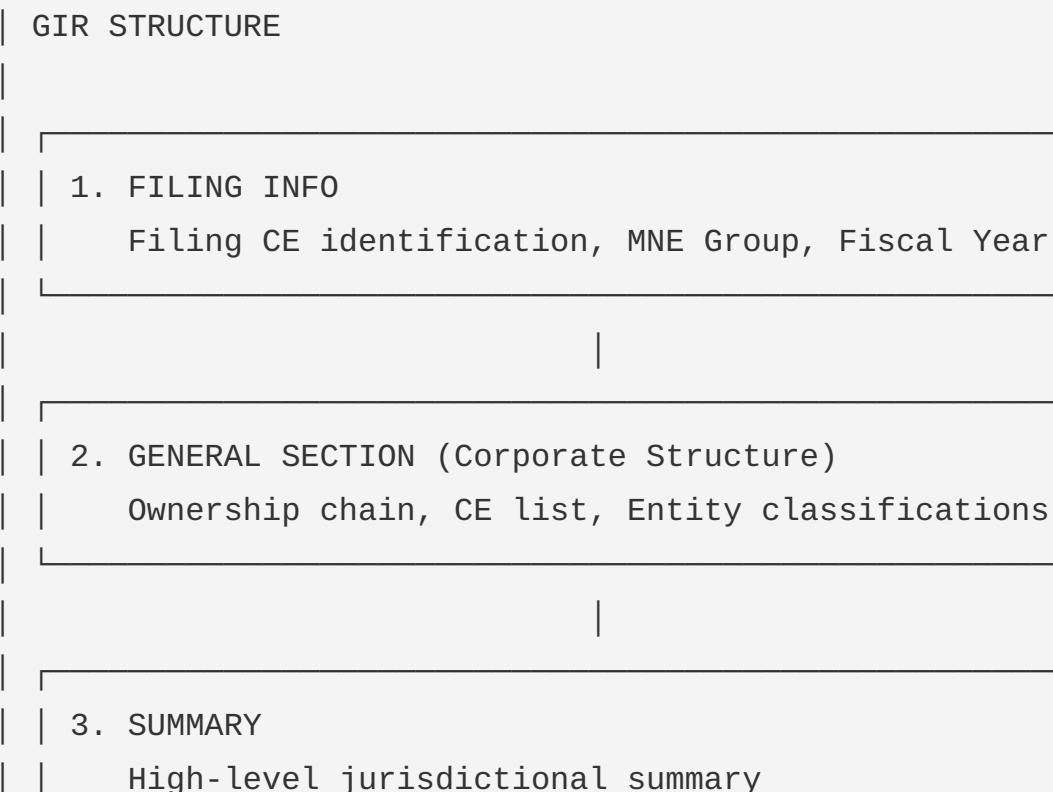
Chapter 7.2: GIR Data Requirements

Learning Objective

After completing this chapter, you will be able to identify the key data elements required in each GIR section, understand the volume and complexity of data points for ETR and Top-Up Tax computations, navigate the XML schema structure, and prepare data collection processes to meet GIR requirements.

1. GIR Structure Overview

The GIR is organised into distinct sections, each requiring specific data elements:



- 4. JURISDICTION SECTION (For each jurisdiction)
 - Safe Harbours and Exclusions
 - ETR Computation (~50 data points)
 - Top-Up Tax Computation (~40 data points)
 - Deferred Tax & Elections (~90 data points)

5. UTPR ATTRIBUTION

Top-Up Tax allocation among UTPR jurisdictions

2. Section 1: Filing Info

2.1 Purpose

Identifies the entity filing the GIR, the MNE Group, and the reporting period.

2.2 Key Data Elements

Data Element	Description	Format
Filing CE Name	Legal name of entity filing the GIR	Text
Filing CE Jurisdiction	2-character ISO country code	ISO 3166-1 Alpha-2
Filing CE Tax ID	Local tax identification number	Text
MNE Group Name	Name commonly used in Consolidated Financial Statements	Text
UPE Name	Legal name of Ultimate Parent Entity	Text

Data Element	Description	Format
UPE Jurisdiction	Country where UPE is located	ISO 3166-1 Alpha-2
Fiscal Year Start	First day of reporting period	Date (YYYY-MM-DD)
Fiscal Year End	Last day of reporting period	Date (YYYY-MM-DD)
Reporting Currency	Currency used throughout GIR	ISO 4217 (e.g., EUR, USD)

2.3 Exchange Jurisdictions

The Filing CE must identify jurisdictions where filing obligations are intended to be met through QCAA exchange:

EXCHANGE JURISDICTION DECLARATION

Filing CE: Stratos Holdings plc (UK)

Jurisdictions covered by QCAA exchange:

- Germany
- Ireland
- Luxembourg
- Singapore
- USA

Jurisdictions requiring local filing:

- Cayman Islands (no QCAA)

Section 2: General Section (Corporate Structure)

2.1 Purpose

Provides the complete ownership structure of the MNE Group, including all Constituent Entities and their classifications.

2.2 Key Data Elements

Data Element	Description
CE List	All Constituent Entities with identification details
Entity Name	Legal name of each CE
Entity Jurisdiction	2-character country code
Entity Tax ID	Local tax identification number(s)
Ownership Percentage	Direct and indirect ownership by UPE
Entity Classification	UPE, IPE, POPE, MOCE, JV, Excluded Entity, etc.
Main Parent	Direct parent entity for each CE
Consolidation Method	Full, proportional, equity method

3.3 Entity Classifications

Code	Classification	Description
UPE	Ultimate Parent Entity	Top of ownership chain
IPE	Intermediate Parent Entity	Parent with IIR obligation
POPE	Partially-Owned Parent Entity	<80% owned by UPE
MOCE	Minority-Owned Constituent Entity	≤30% owned, consolidated

Code	Classification	Description
JV	Joint Venture	≥50% equity-accounted
IE	Investment Entity	Article 7.4 entity
PE	Permanent Establishment	Branch operations
EE	Excluded Entity	Article 1.5 exclusions

Stratos Example: Corporate Structure Data

Entity	Jurisdiction	Tax ID	Ownership	Classification
Stratos Holdings plc	GB	GB123456789	100%	UPE
SG Germany GmbH	DE	DE987654321	100%	CE
SG Singapore Pte Ltd	SG	SG12345678X	100%	CE
SG Ireland Ltd	IE	IE1234567T	100%	CE
Atlas Ireland Ltd	IE	IE7654321T	28%	MOCE
TechStart Inc.	US	US-12-3456789	100%	CE
TechStart JV Pte Ltd	SG	SG87654321X	55%	JV

4. Section 3: Summary

2.1 Purpose

Provides a high-level overview of GloBE outcomes by jurisdiction before detailed calculations.

2.2 Key Data Elements

Data Element	Description
Jurisdiction	2-character country code
Number of CEs	Count of Constituent Entities in jurisdiction
Safe Harbour Applied	Yes/No and type (CbCR, QDMTT, etc.)
De Minimis Applied	Yes/No
ETR	Jurisdictional Effective Tax Rate
Top-Up Tax	Total jurisdictional Top-Up Tax
QDMTT	QDMTT amount (if applicable)
IIR Liability	IIR amount allocated
UTPR Liability	UTPR amount allocated

Summary Table Format

Jurisdiction	CEs	Safe Harbour	De Minimis	ETR	Top-Up Tax (€)	QDMTT (€)	IIR (€)
GB	2	No	No	25.00%	0	0	0

Jurisdiction	CEs	Safe Harbour	De Minimis	ETR	Top-Up Tax (€)	QDMTT (€)	IIR (€)
DE	2	No	No	23.00%	0	0	0
US	2	No	No	15.49%	0	0	0
SG	1	No	No	9.81%	197,498	0	197,498
IE	2	No	No	11.80%	426,394	426,394	0
LU	1	No	Yes	N/A	0	0	0
KY	1	No	No	1.00%	280,480	0	280,480

5. Section 4: Jurisdiction Section

5.1 Overview

The most detailed section of the GIR, containing all computational data for each jurisdiction. This section has **approximately 180+ data points** per jurisdiction.

4.1 Safe Harbours and Exclusions

Data Element	Description
Transitional CbCR Safe Harbour	Claimed? Test met?
QDMTT Safe Harbour	Claimed?
De Minimis Exclusion	3-year revenue average, income average
Routine Profits Test	If applicable
ETR Test	If applicable

4.2 ETR Computation (~50 Data Points)

GloBE Income Data

Data Element	Article Reference
Financial Accounting Net Income/Loss	Art. 3.1.2
Net taxes expense	Art. 3.2.1(a)
Excluded dividends	Art. 3.2.1(b)
Excluded equity gains/losses	Art. 3.2.1(c)
Asymmetric foreign currency gains/losses	Art. 3.2.1(e)
Policy disallowed expenses	Art. 3.2.1(f)
Prior period errors	Art. 3.2.1(g)
Accrued pension expense	Art. 3.2.1(h)
Stock-based compensation (election)	Art. 3.2.2
International shipping income exclusion	Art. 3.3
Arm's length adjustments	Art. 3.2.3
Total GloBE Income	Art. 3.1.1

Covered Taxes Data

Data Element	Article Reference
Current tax expense	Art. 4.1.2(a)
Deferred tax expense	Art. 4.1.2(a)
Taxes on excluded income	Art. 4.1.3(a)

Data Element	Article Reference
Uncertain tax positions	Art. 4.1.3(b)
Non-creditable foreign taxes	Art. 4.1.3(c)
Qualified refundable tax credits	Art. 4.1.3(d)
Disqualified refundable credits	Art. 4.1.3(e)
Adjusted Covered Taxes	Art. 4.1.1

ETR Calculation

Data Element	Formula
Jurisdictional Net GloBE Income	Sum of all CEs
Adjusted Covered Taxes	Sum of all CEs
Effective Tax Rate	ACT ÷ Net GloBE Income

4.3 Top-Up Tax Computation (~40 Data Points)

SBIE Calculation

Data Element	Description
Eligible employees	Count per jurisdiction
Eligible payroll costs	Total qualifying payroll
Payroll carve-out rate	Transition rate (9.8% for 2025)
Payroll carve-out amount	Payroll × Rate
Tangible assets carrying value	NBV of qualifying assets

Data Element	Description
Asset carve-out rate	Transition rate (7.8% for 2025)
Asset carve-out amount	Assets × Rate
Total SBIE	Payroll + Asset carve-outs

Top-Up Tax Calculation

Data Element	Formula
Net GloBE Income	From ETR section
Less: SBIE	From SBIE calculation
Excess Profit	GloBE Income – SBIE
Minimum Rate	15%
Jurisdictional ETR	From ETR calculation
Top-Up Tax Percentage	15% – ETR
Jurisdictional Top-Up Tax	Excess Profit × Top-Up Tax %

Additional Top-Up Tax Items

Data Element	Article Reference
QDMTT payable	Art. 10.1
IIR Top-Up Tax	Art. 2.1
UTPR Top-Up Tax	Art. 2.4
Recapture amounts	Art. 4.4

Data Element	Article Reference
Additional current Top-Up Tax	Various

4.4 Deferred Tax Adjustments (~50 Data Points)

Data Element	Description
Opening deferred tax liability	By category
Movements in DTL	Current year changes
DTL recapture amounts	5-year rule
Deferred tax assets	GloBE Loss Election
DTL categories	Accelerated depreciation, provisions, etc.

4.5 Elections (~40 Data Points)

Election	Article	Data Required
Stock-based compensation	Art. 3.2.2	Amount adjusted
GloBE Loss Election	Art. 4.5	DTA amount
SBIE allocation	Art. 5.3.5	Allocation method
De Minimis	Art. 5.5	3-year averages
Investment Entity elections	Art. 7.5/7.6	Entity list, method
Aggregate DTL recapture	Art. 4.4.4	DTL details

6. Section 5: UTPR Attribution

2.1 Purpose

Details the allocation of UTPR Top-Up Tax among jurisdictions where CEs are located.

Data Elements

Data Element	Description
Low-taxed jurisdiction	Source of Top-Up Tax
UTPR jurisdictions	Jurisdictions collecting UTPR
UTPR percentage	Based on employees and assets
UTPR amount	Allocated Top-Up Tax per jurisdiction

UTPR Allocation Formula

$$\text{UTPR Percentage} = \frac{(\text{Employees in Jurisdiction} + \text{Tangible Assets in Jurisdiction})}{(\text{Total Employees} + \text{Total Tangible Assets in UTPR Jurisdictions})}$$

$$\text{UTPR Amount} = \text{Total UTPR Top-Up Tax} \times \text{UTPR Percentage}$$

Data Volume Summary

The GIR requires substantial data collection:

Section	Approximate Data Points
Filing Info	15

Section	Approximate Data Points
General Section (Corporate Structure)	10 per entity
Summary	10 per jurisdiction
Jurisdiction Section	180+ per jurisdiction
UTPR Attribution	5 per allocation

For a group like Stratos with 7 jurisdictions and 12 entities:

Filing Info:	15 data points
Corporate Structure:	120 data points (12 entities × 10)
Summary:	70 data points (7 jurisdictions × 10)
Jurisdiction Sections:	1,260 data points (7 × 180)
UTPR Attribution:	10 data points (estimated)
<hr/>	
TOTAL:	~1,475 data points

7. XML Schema Structure

The GIR is filed using a standardised XML format:

Schema Components

```

<GIR>
  <MessageHeader>
    <SendingEntityIN>...</SendingEntityIN>
    <ReceivingCountry>...</ReceivingCountry>
    <MessageType>GIR</MessageType>
    <ReportingPeriod>...</ReportingPeriod>
  </MessageHeader>

  <FilingInfo>

```

```

<FilingCE>...</FilingCE>
<MNEGroup>...</MNEGroup>
<FiscalYear>...</FiscalYear>
</FilingInfo>

<GeneralSection>
  <CorporateStructure>
    <ConstituentEntity>...</ConstituentEntity>
    <!-- Repeated for each CE -->
  </CorporateStructure>
</GeneralSection>

<Summary>
  <JurisdictionSummary>...</JurisdictionSummary>
  <!-- Repeated for each jurisdiction -->
</Summary>

<JurisdictionSection>
  <SafeHarbours>...</SafeHarbours>
  <ETRComputation>...</ETRComputation>
  <TopUpTaxComputation>...</TopUpTaxComputation>
  <!-- Repeated for each jurisdiction -->
</JurisdictionSection>

<UTPRAtribution>
  <Allocation>...</Allocation>
</UTPRAtribution>
</GIR>

```

Validation Requirements

The XML must pass schema validation:

- Required elements present
- Data types correct (dates, numbers, codes)
- Cross-references valid (entity IDs match)
- Calculations consistent ($ETR = ACT \div Income$)

Data Collection Process

Recommended Workflow

DATA COLLECTION WORKFLOW

Phase 1: STRUCTURAL DATA (Month 1-3 post year-end)

- |— Confirm CE list and ownership
- |— Verify entity classifications
- |— Document JVs, MOCEs, Investment Entities
- |— Map data sources per entity

Phase 2: FINANCIAL DATA (Month 3-6 post year-end)

- |— Extract financial accounting data
- |— Gather local tax return data
- |— Collect deferred tax schedules
- |— Obtain payroll and asset registers

Phase 3: ADJUSTMENTS (Month 6-9 post year-end)

- |— Calculate GloBE Income adjustments
- |— Compute Covered Tax adjustments
- |— Apply elections
- |— Verify arm's length pricing

Phase 4: COMPUTATIONS (Month 9-12 post year-end)

- |— Calculate ETR per jurisdiction
- |— Compute SBIE
- |— Determine Top-Up Tax
- |— Allocate IIR/UTPR

Phase 5: REVIEW & FILING (Month 12-15 post year-end)

- |— Internal review and sign-off
- |— XML generation and validation

- └─ Submit GIR
- └─ File notifications

Data Source Mapping

Data Element	Primary Source	Secondary Source
Financial Accounting Net Income	Consolidated accounts	Local statutory accounts
Current tax expense	Tax provisions	Tax returns
Deferred tax	Tax provisions	DTA/DTL schedules
Payroll	HR systems	Payroll providers
Tangible assets	Fixed asset register	Accounts
Ownership	Legal records	Group structure database

January 2025 Simplifications

The January 2025 Administrative Guidance provides simplifications where:

Single Jurisdiction Taxing Rights

If only **one jurisdiction** has taxing rights (e.g., only IIR applies): - GIR can be completed based on domestic rules rather than pure GloBE Rules - Reduces need to maintain parallel calculations

QDMTT Safe Harbour

If **QDMTT Safe Harbour** applies: - Simplified reporting for that jurisdiction - Less granular data required - Focus on domestic QDMTT computation

Purpose of Simplifications

SIMPLIFICATION RATIONALE

Without simplification:

- Complete GIR per GloBE Rules
- Complete local return per domestic rules
- Reconcile differences
- Double compliance burden

With simplification:

- Single source of data
- Domestic rules accepted in GIR
- Reduced reconciliation
- Lower compliance cost

8. Common Data Quality Issues

Issue 1: Entity Identification Mismatches

Problem: Tax IDs don't match across systems.

Solution: Establish single source of truth for entity identification. Reconcile tax IDs across all jurisdictions before filing.

Issue 2: Ownership Percentage Inconsistencies

Problem: Different ownership figures in legal records vs. accounts.

Solution: Use ownership per Consolidated Financial Statements. Document basis for any differences.

Issue 3: Currency Translation Errors

Problem: Inconsistent exchange rates across data points.

Solution: Use consistent rates (typically average for P&L, closing for balance sheet). Document rate source.

Issue 4: Missing Substance Data

Problem: Payroll and asset data not available by jurisdiction.

Solution: Work with local teams early to establish data collection processes. Build into year-end close procedures.

Issue 5: Deferred Tax Reconciliation

Problem: Local deferred tax doesn't match GloBE requirements.

Solution: Maintain separate GloBE DTL tracking. Reconcile to local accounts with documented adjustments.

9. Stratos Data Collection Example

Data Sources for Stratos Group

Entity	Financial Data	Tax Data	Substance Data
Stratos Holdings plc	SAP	UK tax return	UK HR/Assets
SG Germany GmbH	SAP	German tax return	German HR/Assets
SG Singapore Pte	Local ERP	Singapore tax return	Singapore HR/Assets
SG Ireland Ltd	SAP	Irish tax return	Irish HR/Assets
TechStart Inc.	Oracle	US tax return	US HR/Assets
TechStart JV Pte	JV accounts	JV tax returns	JV data request

Key Data Collection Challenges

Challenge	Mitigation
TechStart post-acquisition	Partial year data extraction
JV data access	Data sharing agreement with JV partner
Atlas Ireland MOCE	Separate data collection from main Irish entity
Multiple ERP systems	Data mapping and consolidation

10. GIR Data Checklist

GIR DATA REQUIREMENTS CHECKLIST

MNE Group: _____

Fiscal Year: _____

SECTION A: FILING INFO DATA

- Filing CE name and jurisdiction
- Filing CE tax identification number(s)
- MNE Group name (per CFS)
- UPE identification details
- Fiscal year dates
- Reporting currency
- QCAA exchange jurisdiction list

COMPLETE /

SECTION B: CORPORATE STRUCTURE DATA

- Complete CE list with jurisdictions

COMPLETE /

<input type="checkbox"/> Tax identification numbers for all CEs	COMPLETE /
<input type="checkbox"/> Ownership percentages (direct and indirect)	COMPLETE /
<input type="checkbox"/> Entity classifications (UPE, MOCE, JV, etc.)	COMPLETE / P
<input type="checkbox"/> Excluded Entity identification	COMPLETE /
<input type="checkbox"/> JV Group structures	COMPLETE /

SECTION C: FINANCIAL DATA (Per Jurisdiction)

Jurisdiction: _____

<input type="checkbox"/> Financial Accounting Net Income	COMPLETE /
<input type="checkbox"/> GloBE adjustments (dividends, gains, etc.)	COMPLETE / P
<input type="checkbox"/> Current tax expense	COMPLETE /
<input type="checkbox"/> Deferred tax movements	COMPLETE /
<input type="checkbox"/> DTL schedule by category	COMPLETE /

(Repeat for each jurisdiction)

SECTION D: SUBSTANCE DATA (Per Jurisdiction)

Jurisdiction: _____

<input type="checkbox"/> Employee count	COMPLETE /
<input type="checkbox"/> Eligible payroll costs	COMPLETE /
<input type="checkbox"/> Tangible asset carrying values	COMPLETE /
<input type="checkbox"/> Asset location verification	COMPLETE /

(Repeat for each jurisdiction)

SECTION E: ELECTIONS AND SAFE HARBOURS

Elections made (list):

- _____
- _____
- _____

Safe harbours claimed:

- Transitional CbCR Safe Harbour (jurisdictions): _____
- QDMTT Safe Harbour (jurisdictions): _____
- De Minimis (jurisdictions): _____

SECTION F: DATA QUALITY REVIEW

- | | |
|--|----------|
| <input type="checkbox"/> Entity IDs reconciled across all sources? | YES / NO |
| <input type="checkbox"/> Ownership percentages verified? | YES / NO |
| <input type="checkbox"/> Currency translation rates documented? | YES / NO |
| <input type="checkbox"/> ETR calculations cross-checked? | YES / NO |
| <input type="checkbox"/> SBIE data verified with source systems? | YES / NO |
| <input type="checkbox"/> XML schema validation passed? | YES / NO |