

Chapter 7.1: GloBE Information Return Overview

Learning Objective

After completing this chapter, you will be able to identify who must file a GloBE Information Return, determine filing deadlines and notification requirements, understand the central filing mechanism and Designated Filing Entity role, and navigate the key sections of the GIR structure.

1. What Is the GloBE Information Return?

The **GloBE Information Return (GIR)** is a standardised return that provides tax administrations with the information needed to evaluate an MNE Group's Pillar Two calculations.

GIR PURPOSE

The GIR enables tax authorities to:

- Verify ETR calculations by jurisdiction
- Confirm Top-Up Tax amounts
- Understand group structure and ownership
- Assess QDMTT, IIR, and UTPR liabilities
- Exchange information with other jurisdictions

KEY PRINCIPLE:

One standardised return → Multiple tax authorities

| Filed once centrally → Exchanged automatically

2. Who Must File? (*Article 8.1.1*)

2.1 Default Rule: Every Constituent Entity

Under Article 8.1.1, **each Constituent Entity** located in an implementing jurisdiction must file a GIR with its local tax administration.

DEFAULT FILING OBLIGATION

MNE Group



Result: 5 separate GIR filings

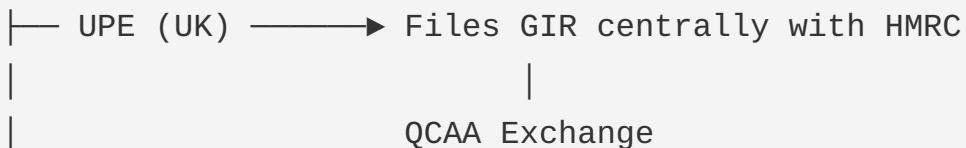
2.2 Central Filing Exception (*Article 8.1.2*)

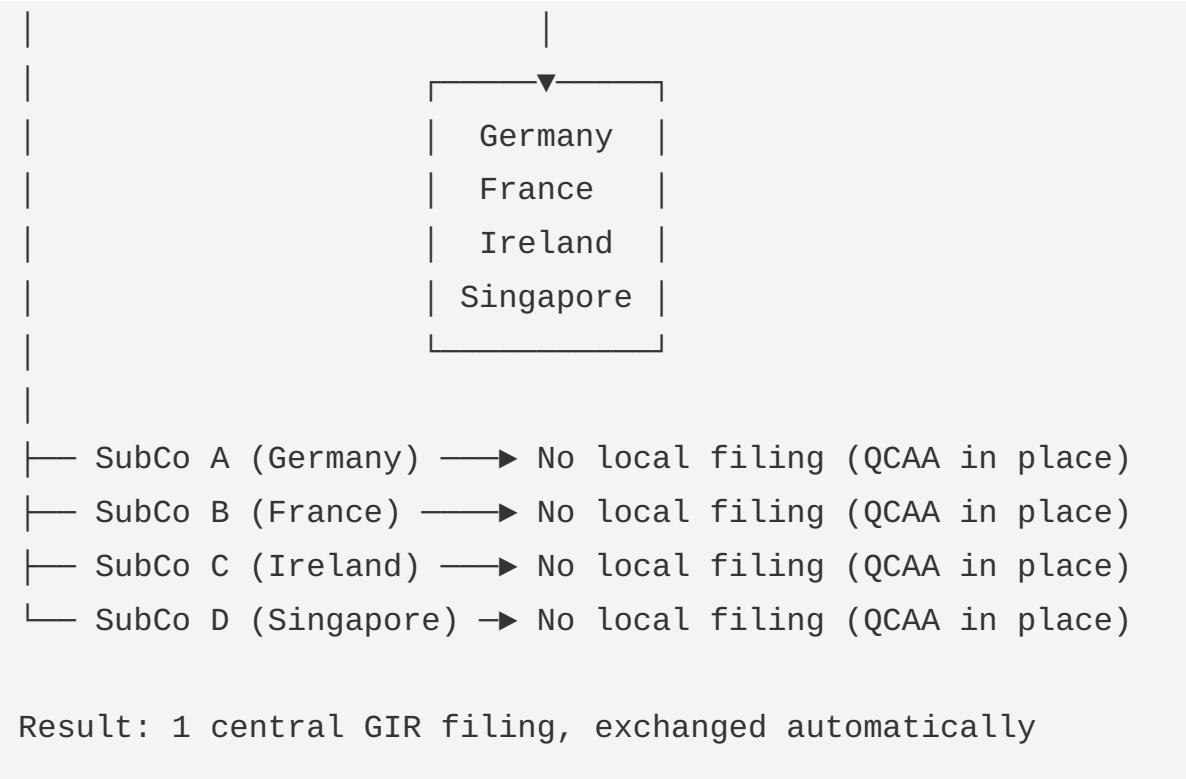
The local filing obligation **does not apply** if:

1. The **UPE** or a **Designated Filing Entity (DFE)** files the GIR centrally, AND
2. A **Qualifying Competent Authority Agreement (QCAA)** is in place to exchange GIR information with the Constituent Entity's jurisdiction

CENTRAL FILING MECHANISM

MNE Group





Key benefit: Central filing dramatically reduces compliance burden — one filing instead of potentially dozens.

3. Designated Filing Entity (DFE)

3.1 What Is a DFE?

A **Designated Filing Entity** is a Constituent Entity appointed by the MNE Group to file the GIR on behalf of all Group members.

Who Can Be the DFE?

Eligible Entity	Requirements
UPE	Default filer if located in implementing jurisdiction
Any Constituent Entity	If UPE is not in implementing jurisdiction, any CE can be designated
	If appointed under local rules

Eligible Entity	Requirements
Surrogate Parent Entity	

3.2 DFE Appointment Process

DFE APPOINTMENT WORKFLOW

Step 1: Identify potential DFE

- Usually UPE or major intermediate holding company
- Must be in jurisdiction with QCAA coverage

Step 2: Notify local tax authorities

- Each CE notifies its tax authority of DFE appointment
- Notification deadline: typically 3 months before GIR due date

Step 3: DFE files GIR centrally

- Single filing with DFE's tax authority
- Tax authority exchanges via QCAA

Step 4: Exchange occurs automatically

- Other jurisdictions receive relevant sections
- No action required from other CEs

4. Notification Requirements (*Article 8.1.3*)

When Is Notification Required?

Each Constituent Entity must **notify** its local tax authority:

Notification Type	Content	Deadline
DFE Notification	Identity of the entity filing the GIR	Typically 3 months before GIR due date
QCAA Reliance	Confirmation that QCAA exchange will occur	Same as above
Local Filing	If filing locally (no QCAA), confirm local filing	Per local rules

What Happens Without Notification?

FAILURE TO NOTIFY

If CE does not notify local tax authority:

- Local filing obligation remains
- CE must file full GIR locally
- Potential duplicate filings
- Penalties may apply for late/non-filing

Country-Specific Notification Deadlines

Jurisdiction	Notification Deadline
Ireland	3 months before GIR due date
Spain	3 months before GIR due date
South Africa	6 months before first submission deadline
UK	Per HMRC guidance (typically 3 months)

5. Filing Deadlines (Article 8.1.5)

5.1 Standard Deadline: 15 Months

The GIR must be filed within **15 months** after the end of the Fiscal Year.

First Year Extension: 18 Months

For the **first Fiscal Year** that Pillar Two applies, the deadline is extended to **18 months**.

FILING DEADLINE EXAMPLES

Fiscal Year End: 31 December 2024 (first year)

Standard deadline: 31 March 2026 (15 months)

First-year extension: 30 June 2026 (18 months)

→ Actual deadline: 30 June 2026

Fiscal Year End: 31 December 2025 (second year)

Standard deadline: 31 March 2027 (15 months)

→ Actual deadline: 31 March 2027

First GIR Filing: 30 June 2026

Per December 2023 Administrative Guidance, the **earliest due date** for GIR filing is **30 June 2026**.

Fiscal Year End	First Year?	Deadline
31 Dec 2024	Yes	30 June 2026
31 March 2025	Yes	30 September 2026
30 June 2025	Yes	31 December 2026

Fiscal Year End	First Year?	Deadline
31 Dec 2025	No	31 March 2027

6. GIR Structure Overview

The GIR is organised into distinct sections, with different sections shared with different tax authorities:

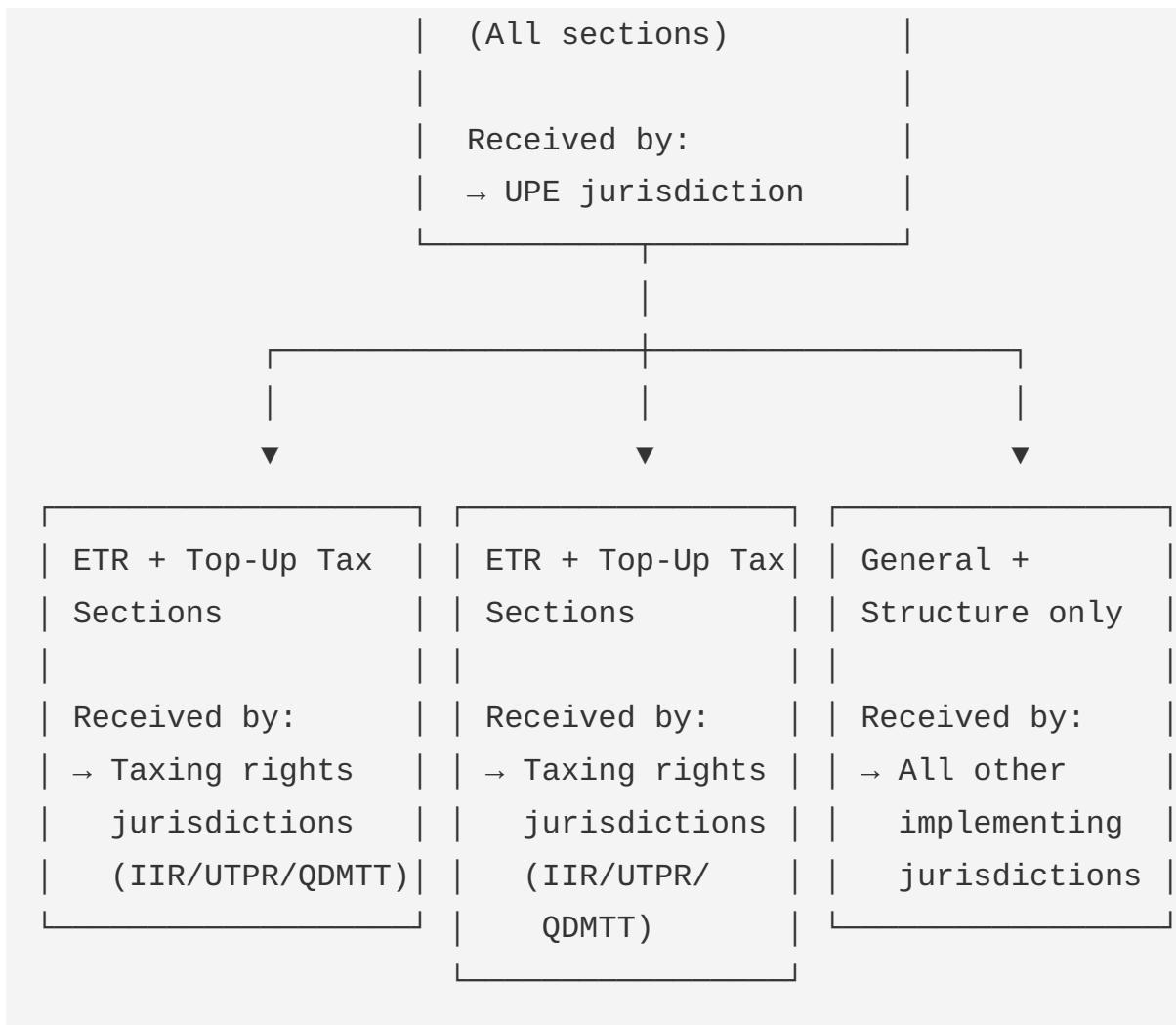
Section Overview

Section	Content	Shared With
General Information	Group identification, fiscal year, UPE details	All implementing jurisdictions
Corporate Structure	Ownership chain, CE list, jurisdictions	All implementing jurisdictions
ETR Computation	Jurisdictional ETR calculations, GloBE Income, Covered Taxes	Jurisdictions with taxing rights
Top-Up Tax	QDMTT, IIR, UTPR amounts by jurisdiction	Jurisdictions with taxing rights
Elections	GloBE elections made (SBIE, De Minimis, etc.)	Relevant jurisdictions
Safe Harbours	Transitional safe harbour claims	Relevant jurisdictions

Information Flow

GIR INFORMATION EXCHANGE

COMPLETE GIR



7. Key GIR Data Elements

General Information Section

Data Element	Description
MNE Group name	Legal name of the Group
UPE identification	Name, jurisdiction, tax ID
Fiscal year	Start and end dates
Reporting currency	Currency used in GIR

Data Element	Description
DFE identification	If different from UPE

Corporate Structure Section

Data Element	Description
Constituent Entity list	All CEs with jurisdiction and tax ID
Ownership percentages	Direct and indirect ownership
Entity classification	UPE, IPE, POPE, MOCE, JV, etc.
Excluded Entities	Identified with exclusion basis

ETR Computation Section

Data Element	Description
GloBE Income by jurisdiction	Aggregated jurisdictional income
Adjusted Covered Taxes	By jurisdiction
ETR calculation	Income ÷ Taxes
SBIE computation	Payroll and asset carve-outs
Excess Profit	GloBE Income less SBIE
Top-Up Tax Percentage	15% minus ETR

Top-Up Tax Section

Data Element	Description
Jurisdictional Top-Up Tax	Per low-taxed jurisdiction
QDMTT amounts	By jurisdiction
IIR allocation	To UPE/IPE
UTPR allocation	By jurisdiction
Total Top-Up Tax	Group-wide summary

8. Stratos Worked Example: GIR Filing Strategy

8.1 Background

Stratos Holdings plc (UK) must determine its GIR filing strategy for FY 2025 (year ending 31 December 2025).

Group Structure (Post-TechStart Acquisition)

```
Stratos Holdings plc (UK) – UPE
└── SG Germany GmbH (Germany)
└── SG Singapore Pte Ltd (Singapore)
└── SG Ireland Ltd (Ireland)
└── SG Luxembourg S.à r.l. (Luxembourg)
└── Atlas Ireland Ltd (Ireland) – 28% MOCE
└── TechStart Inc. (USA)
    ├── TechStart UK Ltd (UK)
    ├── TechStart GmbH (Germany)
    ├── TechStart JV Pte Ltd (Singapore) – 55% JV
    ├── TechStart IP LLC (USA)
    └── TechStart Ventures Fund (Cayman)
```

Step 1: Identify Filing Options

Option	Description	Filings Required
A: Local Filing	Each CE files locally	11+ separate filings
B: Central Filing (UPE)	Stratos plc files for all	1 filing (if QCAA covers all)
C: Central Filing (DFE)	Designate another CE	1 filing (if QCAA covers all)

Step 2: Assess QCAA Coverage

Jurisdiction	QCAA with UK?	Central Filing Available?
Germany	Yes (EU MCAA)	✓
Singapore	Expected	✓
Ireland	Yes (EU MCAA)	✓
Luxembourg	Yes (EU MCAA)	✓
USA	Expected	✓
Cayman	TBD	Potentially local filing

Issue: Cayman may not have QCAA with UK. If not, TechStart Ventures Fund may require local filing (if Cayman implements Pillar Two).

Step 3: Determine Filing Strategy

Recommended Approach: Central filing via Stratos Holdings plc (UPE)

Element	Decision
DFE	Stratos Holdings plc (UK)

Element	Decision
Filing jurisdiction	UK (HMRC)
Notification required	All CEs notify local authorities of UK central filing
Local filings	Cayman only (if no QCAA)

Step 4: Timeline for FY 2025

Date	Action
31 Dec 2025	Fiscal year end
31 Dec 2026	Notification deadline (3 months before GIR due)
31 Mar 2027	GIR filing deadline (15 months)

Step 5: GIR Content Summary

Jurisdictions to Report:

Jurisdiction	GloBE Income (€)	ETR	Top-Up Tax (€)	Mechanism
UK	11,525,000	25.00%	0	—
Germany	59,929,000	23.00%	0	—
USA	12,300,400	15.49%	0	—
Singapore	4,000,000	9.81%	197,498	IIR
Ireland	15,000,000	11.80%	426,394	QDMTT
Luxembourg	—	—	0	De Minimis
Cayman	2,016,000	1.00%	280,480	IIR

JV Reporting (Separate Section):

JV Jurisdiction	GloBE Income (€)	Top-Up Tax (€)	Stratos Share
Singapore	10,000,000	485,750	55%
Malaysia	5,000,000	140,520	55%

9. Common Pitfalls

Pitfall 1: Missing Notification Deadline

Error: Failing to notify local tax authorities of central filing arrangement.

Consequence: Local filing obligation remains; potential penalties.

Correct approach: Calendar notification deadlines (typically 3 months before GIR due) and file notifications proactively.

Pitfall 2: Assuming QCAA Coverage

Error: Assuming all jurisdictions have QCAA with central filing jurisdiction.

Consequence: Local filing required but not prepared.

Correct approach: Verify QCAA status for each jurisdiction where CEs are located. Prepare local filings where QCAA not confirmed.

Pitfall 3: Incomplete JV Reporting

Error: Omitting JV data from GIR because JV is "separate."

Correct approach: JVs require separate reporting within the GIR. Include JV Group calculations and allocation to parent entities.

Pitfall 4: Currency Inconsistency

Error: Reporting different sections in different currencies.

Correct approach: GIR must be in a single **presentation currency** (typically Group reporting currency). Apply consistent exchange rates.

Pitfall 5: First-Year Deadline Confusion

Error: Using 15-month deadline for first Pillar Two year.

Correct approach: First year has **18-month** deadline. For FY 2024 (Dec year-end), deadline is 30 June 2026, not 31 March 2026.

10. GIR Filing Checklist

GIR FILING CHECKLIST

MNE Group: _____

Fiscal Year: _____

UPE Jurisdiction: _____

SECTION A: FILING STRATEGY

Filing approach selected:

- Central filing (UPE files)
- Central filing (DFE files)
- Local filing (each CE files separately)

Designated Filing Entity (if applicable):

Name: _____

Jurisdiction: _____

QCAA coverage verified for all CE jurisdictions?

YES / NO

Jurisdictions WITHOUT QCAA coverage:

1. _____

2. _____

→ Local filings required for above jurisdictions

SECTION B: NOTIFICATION

Notification deadline calculated: _____

Notifications filed with local authorities:

Jurisdiction	CE Name	Notification Filed?	Date
-----	-----	-----	-----
YES / NO			
YES / NO			
YES / NO			

SECTION C: FILING DEADLINE

Fiscal year end date: _____

Is this the first Pillar Two year? YES / NO

Filing deadline:

Standard (15 months): _____

First-year extension (18 months): _____

Actual deadline: _____

SECTION D: GIR CONTENT PREPARATION

General Information section complete? YES / NO

Corporate Structure section complete? YES / NO

ETR Computation by jurisdiction complete? YES / NO

- | | |
|---|----------|
| <input type="checkbox"/> Top-Up Tax calculations complete? | YES / NO |
| <input type="checkbox"/> Elections documented? | YES / NO |
| <input type="checkbox"/> Safe Harbour claims documented? | YES / NO |
| <input type="checkbox"/> JV reporting (if applicable) complete? | YES / NO |
| <input type="checkbox"/> MOCE reporting (if applicable) complete? | YES / NO |
-

SECTION E: QUALITY REVIEW

- | | |
|--|----------|
| <input type="checkbox"/> Currency consistency verified? | YES / NO |
| <input type="checkbox"/> Ownership percentages reconciled? | YES / NO |
| <input type="checkbox"/> ETR calculations cross-checked? | YES / NO |
| <input type="checkbox"/> Top-Up Tax totals reconciled? | YES / NO |
| <input type="checkbox"/> XML schema validation passed? | YES / NO |
-

SECTION F: FILING CONFIRMATION

- | | |
|---|-------|
| <input type="checkbox"/> GIR filed with: | _____ |
| <input type="checkbox"/> Filing date: | _____ |
| <input type="checkbox"/> Filing confirmation/reference: | _____ |
- Local filings (if required):

Jurisdiction	Filed?	Date	Reference
YES / NO			