

Tax Insights

Bahrain Domestic Minimum Top-up Tax (DMTT): Journey so far and next steps

September 2025

On 1 September 2024, Bahrain became the first GCC country to implement a DMTT aligned with the Organization for Economic Cooperation and Development (OECD) Pillar Two Global Anti-Base Erosion Model Rules (GloBE rules) effective from fiscal years starting on or after 1 January 2025.

In this Tax Insights, we have summarized the DMTT journey so far for in-scope Multinational Enterprise (MNE) Groups with operations in Bahrain and the next steps.

Journey so far...

September 2024

Release of the [Decree-Law No. \(11\) of 2024 Regarding the Implementation of Tax on Multinational Enterprise \(MNE\) Groups](#) (DMTT Law). For key highlights of the DMTT Law, please refer to our previous [Tax Alert](#).

December 2024

Release of the [Executive Regulations for Decree-Law No. \(11\) of 2024 Regarding the Implementation of Tax on Multinational Enterprises](#) (DMTT Regulations). For key highlights of the DMTT Executive Regulations, please refer to our previous [Tax Alert](#).

January 2025

Release of first set of DMTT guidelines by the National Bureau for Revenue (NBR) - [Guide to the scope of the DMTT law and registration requirements](#), [Entities in scope of DMTT guide](#) and [DMTT registration manual](#). These guides have been updated by the NBR subsequently.

May 2025

Release of the [DMTT Administrative Guide](#) setting out the general principles relating to various administrative aspects of the DMTT implementation. This guide has been updated by the NBR subsequently.

July 2025

Release of [DMTT Advance Payment Manual](#) which provides an overview of the DMTT advance payment process. For key highlights of the of DMTT Advance Payment Manual, please refer to our previous [Tax Alert](#). This guide has been updated by the NBR subsequently.

August 2025

For in-scope MNE groups with a 31 December year end, the deadline for the first advance payment to be made by the filing Constituent Entity (CE) was 31 August 2025. Failure to settle the tax liability by the deadline may attract penalties.

Next steps for MNE groups

- Complete any pending registration applications before the first advance payment is due.
- Reassess the eligibility for any exclusions or safe harbors and update the registration information, if required.
- Assess the current cash flow position and plan accordingly where advance payments are due.
- Maintain proper documentation to document estimates and assumptions.
- Assess the impact on financial statements including provisions and disclosures.

For a detailed discussion, [contact us](#).



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