

Euro Tax Flash from KPMG's EU Tax Centre

OECD Clarifies GloBE Information Return Central Filing

Issue 579

May 20, 2026

On May 18, 2026, the OECD released further materials on the Global Minimum Tax (GMT), including:

- [Guidance on central filing and exchange of the GloBE Information Return \(GIR\)](#),
- [Updates to the Central Record](#), and
- [Administrative guidance on the application of the Transitional UTPR Safe Harbour to MNE groups with 52-53 week fiscal years](#).

The releases come shortly before the June 30, 2026, GIR filing deadline for calendar-year groups and are expected to be particularly relevant for multinational enterprise (MNE) groups in addressing practical implementation and compliance considerations.



[Overview of our E-News](#)
[E-News - KPMG Global](#)

[ETFs – Euro Tax Flash](#)
[Euro Tax Flash - KPMG Global](#)

OECD – Global Minimum Tax – Pillar Two – GIR – Central filing – Side-by-Side Package – UTPR Safe Harbor – GloBE Information Return – GIR MCAA – Exchange of Information

Background

On May 18, 2026, the OECD released documents on the GMT, including materials on central filing and exchange of the GIR, updates to the Central Record, and administrative guidance on the application of the Transitional UTPR Safe Harbour in the particular case of MNEs with 52-53 week fiscal years.

Under the initial design of the GMT framework, MNEs were expected to benefit from the option of central GIR filing, whereby a single return filed in one jurisdiction would be exchanged with other relevant jurisdictions, thereby reducing local filing obligations. However, practical implementation challenges have arisen, including:

- Slow activation of bilateral exchange relationships under the GIR Multilateral Competent Authority Agreement (MCAA).
- Failure by some Member States to transpose DAC9 (which allows for GIR exchanges within the EU) .
- Absence of local GIR filing portals in some jurisdictions.

Absent further coordination, these issues could result in multiple local GIR filing requirements for MNEs.

Support for Central GIR filing and Exchange

To address these challenges, the OECD published a common understanding among 33 out of the 38 jurisdictions implementing the GMT for 2024. These jurisdictions are listed in an annex and are also noted as expected to be ready for central filing before May 31.

To the extent permitted by domestic law, parties to the common understanding have committed to waiving penalties and refraining from enforcing local GIR filing obligations provided that the MNE centrally files its GIR in a listed jurisdiction and submits the required local notifications. This approach is subject to a number of limitations:

- Jurisdictions may require local filing if GIR information is not exchanged by December 31, 2026.
- Certain jurisdictions (including the Bahamas, North Macedonia, Slovak Republic and Vietnam) have not joined the common understanding.
- Greece and Poland only provide relief for central filings made in other EU Member States.

In light of the above, MNEs may wish to:

- Review their chosen central filing jurisdiction, potentially taking into account the extent of activated exchange relationships.
- Identify the jurisdictions where the MNE is subject to GMT that did not sign on to the OECD guidance on central filing.
- Identify jurisdictions that do not have an active bilateral exchange relationship with the jurisdiction where they intend to central file as of June 30, 2026.
- Identify the jurisdictions that do not have an active bilateral exchange relationship with the jurisdiction where they centrally file as of December 31, 2026.

For more information, please refer to a detailed [report](#) by KPMG International.

Updates to the Central Record for Purposes of the GMT

The OECD updated the Central Record to include additional jurisdictions, namely the Bahamas, Kenya, Kuwait and Oman, with Qualified Domestic Minimum Top-up Tax (QDMTT) rules and safe harbours, bringing the total number of listed jurisdictions to 50.

For more information, please refer to a detailed [report](#) by KPMG International.

Transitional UTPR Safe Harbor for 52-53 week Fiscal Years

The OECD further released administrative guidance addressing the application of the Transitional UTPR Safe Harbour to MNE groups with 52–53 week fiscal years. The guidance confirms that the safe harbour may apply to fiscal years ending up to January 3, 2027, thereby addressing a potential gap in the application of the transitional rules.

For more information, please refer to a detailed [report](#) by KPMG International.

Next steps

With limited time remaining before the first GIR filing deadline, MNE groups may wish to closely monitor further OECD and domestic developments, including clarifications from local tax administrations, and ensure that filing positions are aligned with evolving administrative guidance.

Should you have any queries, please do not hesitate to contact [KPMG's EU Tax Centre](#) or, as appropriate, your local KPMG tax advisor.



Raluca Enache
Associate Partner
Head of KPMG's EU
Tax Center



Conrad Turley
Head of Global Tax Policy
KPMG International



Tam Do
Global Tax Policy Director
KPMG International



Maud Gendebien
Senior Manager,
KPMG's EU Tax Centre

Key EMA Country contacts

Christoph Marchgraber
Partner
KPMG in Austria
E: cmarchgraber@kpmg.at

Margarita Liasi
Principal
KPMG in Cyprus
E: Margarita.Liasi@kpmg.com.cy

Jussi Järvinen
Partner
KPMG in Finland
E: jussi.jarvinen@kpmg.fi

Zsolt Srankó
Partner
KPMG in Hungary
E: Zsolt.Sranko@kpmg.hu

Ilze Berga
Partner
KPMG in Latvia
E: iberga@kpmg.com

Erwin Nijkeuter
Partner
KPMG in the Netherlands
E: Nijkeuter.Erwin@kpmg.com

Kris Lievens
Partner
KPMG in Belgium
E: klievens@kpmg.com

Ladislav Malusek
Partner
KPMG in Czechia
E: lmalusek@kpmg.cz

Patrick Seroin Joly
Partner
KPMG in France
E: pseroinjoly@kpmgavocats.fr

Ágúst K. Gudmundsson
Partner
KPMG in Iceland
E: agudmundsson@kpmg.is

Vita Sumskaite
Partner
KPMG in Lithuania
E: vsumskaite@kpmg.com

Thor Leegaard
Partner
KPMG in Norway
E: Thor.Leegaard@kpmg.no

Alexander Hadjidimov
Director
KPMG in Bulgaria
E: ahadjidimov@kpmg.com

Birgitte Tandrup
Partner
KPMG in Denmark
E: birgitte.tandrup@kpmg.com

Gerrit Adrian
Partner
KPMG in Germany
E: gadrian@kpmg.com

Colm Rogers
Partner
KPMG in Ireland
E: colm.rogers@kpmg.ie

Olivier Schneider
Partner
KPMG in Luxembourg
E: olivier.schneider@kpmg.lu

Michał Niznik
Partner
KPMG in Poland
E: mniznik@kpmg.pl

Maja Maksimovic
Partner
KPMG in Croatia
E: mmaksimovic@kpmg.com

Joel Zernask
Partner
KPMG in Estonia
E: jzernask@kpmg.com

Antonia Ariel Manika
Director
KPMG in Greece
E: amanika@cpalaw.gr

Lorenzo Bellavite
Partner
KPMG in Italy
E: lbellavite@kpmg.it

John Ellul Sullivan
Partner
KPMG in Malta
E: johnellulsullivan@kpmg.com

António Coelho
Partner
KPMG in Portugal
E: antoniocoelho@kpmg.com

Ionut Mastacaneanu
Associate Partner
KPMG in Romania
E: imastacaneanu@kpmg.com

Zuzana Blazejova
Executive Director
KPMG in Slovakia
E: zblazejova@kpmg.sk

Marko Mehle
Senior Partner
KPMG in Slovenia
E: marko.mehle@kpmg.si

Julio Cesar García
Partner
KPMG in Spain
E: juliocesargarcia@kpmg.es

Caroline Valjemark
Partner
KPMG in Sweden
E: caroline.valjemark@kpmg.se

Stephan Kuhn
Partner
KPMG in Switzerland
E: stefankuhn@kpmg.com

Timur Cakmak
Partner
KPMG in Türkiye
E: tcakmak@kpmg.com

Matthew Herrington
Partner
KPMG in the UK
E: Matthew.Herrington@kpmg.co.uk



Key links

Visit our [website](#) for earlier editions



[Privacy](#) | [Legal](#)

You have received this message from KPMG International Limited and its related entities in collaboration with the EU Tax Centre. Its content should be viewed only as a general guide and should not be relied on without consulting your local KPMG tax adviser for the specific application of a country's tax rules to your own situation.

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

If you wish to unsubscribe from Euro Tax Flash mailing list, please e-mail KPMG's EU Tax Centre mailbox (kpmgeutaxcentre@kpmg.com) with "Unsubscribe Euro Tax Flash" as the subject line. For non-KPMG parties – please indicate in the message field your name, company and country, as well as the name of your local KPMG contact.

If you have any questions, please send an e-mail to kpmgeutaxcentre@kpmg.com. KPMG's EU Tax Centre, Laan van Langerhuize 9, 1186 DS Amstelveen, Netherlands

© 2026 Copyright owned by one or more of the KPMG International entities. KPMG International entities provide no services to clients. All rights reserved. KPMG refers to the global organization or to one or more of the member firms of KPMG International Limited ("KPMG International"), each of which is a separate legal entity. KPMG International Limited is a private English company limited by guarantee and does not provide services to clients. For more detail about our structure please visit kpmg.com/governance.

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.