

OECD Clarifies GloBE Information Return Central Filing

May 2026

On May 18, 2026, the OECD published documents on three aspects of the Global Minimum Tax (“GMT”):

1. Support for Central GloBE Information Return (“GIR”) Filing and Exchange (2024 Reporting Fiscal Year)
2. Updates to the Central Record for Purposes of the GMT
3. Administrative Guidance on the Application of the Transitional UTPR Safe Harbour to MNE Groups with 52-53 Week Fiscal Years

Support for Central GIR Filing and Exchange was published under the mandate of the OECD Secretary-General, while the other documents were published under the mandate of the OECD/G20 Inclusive Framework on BEPS (“Inclusive Framework”).

The Support for Central GIR Filing and Exchange will be the primary focus of most Multinational Enterprises (“MNEs”), particularly with the June 30, 2026, deadline for calendar year MNEs to file their GIR for the 2024 reporting year. Unfortunately, only 33 of the 38 jurisdictions¹ that have implemented the GMT for 2024 have signed onto the common understanding, and the relief it is intended to provide comes with caveats.

1 Support for Central GIR Filing and Exchange

Challenges with central GIR filing

Most MNEs had anticipated that they would file their GIR in a single jurisdiction, which would then share the GIR with other relevant jurisdictions, referred to as “central filing”. The information shared with other jurisdictions would be limited to certain relevant parts of the GIR and would satisfy the MNE’s requirement to file a GIR locally that they would otherwise face.

The exchange of the GIR is supported by two legal instruments:

1. OECD-drafted GIR Multilateral Competent Authority Agreement (“MCAA”)
2. EU Directive 2025/872 on Administrative Cooperation (“DAC9”)

DAC9 is the basis for exchange between EU member states. The GIR MCAA is the basis for exchange between non-EU jurisdictions, and between EU member states and non-EU jurisdictions.

Jurisdictions have been slow to sign and activate bilateral exchange relationships based on the GIR MCAA, and some EU member states are yet to implement DAC9. As of May 18:

- Of the 38 jurisdictions that have implemented the GMT for 2024, 28 have signed the GIR MCAA,² though some of the signatories have not taken the steps required to activate the bilateral exchange relationships.

¹ The OECD guidance refers to 37 jurisdictions because it excludes Cyprus, which has implemented the GMT for 2024 but is not a member of the Inclusive Framework. The Cypriot tax administration’s position on penalty relief and information exchange will therefore need to be monitored separately.

² There are currently 32 signatories to the GIR MCAA. Of these, four have only implemented the GMT from 2025, see [Signatories of the Multilateral Competent Authority Agreement on the Exchange of GloBE Information \(GIR MCAA\)](#).

- Of the 23 EU member states implementing the GMT for 2024, six have not yet fully transposed DAC9 into domestic law.
- Several jurisdictions do not have a GIR filing portal in place.

Absent this guidance, calendar year MNEs may have been required to file GIRs locally to the extent that the relevant GIR exchange relationships are not activated by the June 30 GIR filing deadline.

Common understanding on central GIR filing

The OECD guidance sets out a common understanding among 33 of the 38³ jurisdictions that have implemented the GMT for 2024 that they will waive penalties and forgo enforcement for the absence of a local GIR filing, provided an MNE centrally files their GIR in one of the 33 jurisdictions and files the local GIR notification form. These jurisdictions are listed in an annex and are also noted as expected to be ready for central filing before May 31 (see the end of this document for a full list).

This commitment comes with important caveats:

- The commitment to relieve penalties and not enforce local filing obligations only applies to the extent this is permitted under domestic law.
- Parties to the common understanding may take action to pursue local filing, if the relevant portion of a centrally filed GIR is not received from the central filing jurisdiction by December 31, 2026. This, in effect, reflects an understanding that the global network of GIR exchange relationships will be complete by this date.
- The Bahamas, North Macedonia, Slovak Republic and Vietnam have not joined the common understanding. Thus, timely local GIR filings may be needed in these jurisdictions to avoid penalties unless these jurisdictions have activated GIR exchange relationships with central filing jurisdictions by June 30.
- Greece and Poland only provide the relief for central filings that are made in other EU member states.

KPMG observation

- *The OECD's efforts to address the challenges MNEs face due to the slow implementation of bilateral exchange relationships are welcome. However, the caveat that relief from penalties and local filing obligations is only to the extent permitted by domestic law leaves unanswered questions, such as which jurisdictions have such constraints, what are the constraints, etc.*
- *KPMG understands that this language is intended to indicate that some jurisdictions may interpret that in these circumstances the local filing requirement has been satisfied, while others may not consider this requirement satisfied but will exercise discretion in waiving penalties. Inclusive Framework members may issue their own domestic guidance on this issue, thereby providing greater certainty to MNEs.*
- *In many jurisdictions, elections must be made in the GIR by the filing deadline. Hence, there is a question whether elections made in a centrally filed GIR would be accepted locally under the common understanding. This will be particularly important to MNEs with elections that materially impact the application of the GMT (e.g., MNEs that want to make the GloBE Loss Election for a jurisdiction, which can only be made in the first year the GIR is filed).*
- *If a local filing is undertaken, there is uncertainty whether jurisdictions will accept (or can accept, from a systems perspective) a 'partial GIR' that only includes the jurisdiction-relevant elements of the GIR that would have been received via exchange from a central filing jurisdiction. KPMG is aware that Australia has confirmed that they can/will accept a partial GIR.*
- *KPMG member firms are reviewing domestic legislation and any guidance from local tax administrations to better understand whether domestic law may constrain relief from penalties or enforcement.*
- *A plethora of uncertainties continues to exist in relation to GIR completion, such as the circumstances in which the transitional simplified jurisdictional reporting framework applies and the situations in which multiple effective tax rate ("ETR") calculations (reflecting the varying GMT rule interpretations of different taxing jurisdictions) must be included in the GIR. No further guidance is expected from the OECD on these matters in advance of the June 30 GIR filing, though MNEs may still be able to obtain a degree of clarity through consultation with national tax administrations.*

³ The OECD guidance refers to 37 jurisdictions because it excludes Cyprus, which has implemented the GMT for 2024 but is not a member of the Inclusive Framework. The Cypriot tax administration's position on penalty relief and information exchange will therefore need to be monitored separately.

How should MNEs proceed?

When approaching GIR filing, MNEs should consider the following steps:

- 1. Review where they are planning to file their GIR.** The effectiveness of the central filing mechanism depends on where MNEs file their GIR. For example, exchange relationships will likely be maximized by filing with an EU member state that has implemented DAC9 and activated exchange relationships under the GIR MCAA. If MNEs want to change where they file their GIR, they should consider other implications (e.g., the requirement to adjust registration and notification filings).
- 2. Identify the jurisdictions where the MNE is subject to GMT that did not sign on to the OECD guidance on central filing.** MNEs will be expected to file the GIR locally in the Bahamas, North Macedonia, Slovak Republic⁴, Vietnam and potentially Cyprus, unless they intend to centrally file in these jurisdictions or there is an active bilateral exchange relationship with the jurisdiction where they are centrally filing.
- 3. Identify jurisdictions that do not have an active bilateral exchange relationship with the jurisdiction where they intend to centrally file as of June 30, 2026.** MNEs should review the potential penalties for filing late in these jurisdictions, including the potential applicability of the new common understanding. MNEs may want to take a prudent approach (e.g., file locally) to mitigate the risks where there is uncertainty about penalty relief or the validation of important GloBE elections.
- 4. Identify the jurisdictions that do not have an active bilateral exchange relationship with the jurisdiction where they centrally file as of December 31, 2026.** MNEs should monitor the activation of bilateral exchange relationships towards the end of this year and be prepared to file locally if required.

2 Updates to the Central Record for Purposes of the GMT

This publication updates the Central Record to recognize four additional jurisdictions, the Bahamas, Kenya, Kuwait, and Oman, as having Qualified Domestic Minimum Top-up Tax (“QDMTT”) Rules and QDMTT Safe Harbours pursuant to the transitional qualification mechanism, bringing the total to 50 jurisdictions listed with rules commencing variously in 2024, 2025 and 2026.

The Bahamas’ DMTT applies from 1 January 2024, while the other three apply from 2025. In 2024 the Bahamas DMTT is conditional, such that it only applies to entities subject to the Income Inclusion Rules (“IIRs”) of another jurisdiction. The Bahamas’ transitional qualification status is granted on the basis that this conditionality ceases to apply from 2025, similar to the approach taken for Barbados.

3 Transitional UTPR Safe Harbor for 52-53 week fiscal years

This guidance addresses a gap between the Transitional UTPR Safe Harbor and the new Side-by-Side (“SbS”) and UPE Safe Harbors, that can arise for MNEs with 52-53 week fiscal years.

The Transitional UTPR Safe Harbor applies to fiscal years that begin on or before December 31, 2025, and end before December 31, 2026. The SbS and UPE Safe Harbors only apply for fiscal years beginning on or after January 1, 2026.

MNEs with a standard 12-month fiscal year will be able to rely on the Transitional UTPR Safe Harbour for FY25 and then access the SbS or UPE regime for FY26. It is possible for MNEs with a 52-53 week fiscal year to have a 53-week fiscal year that begins on or before December 31, 2025, and ends on or after December 31, 2026, and hence would not appear to be eligible for the UTPR, SbS or UPE Safe Harbors.

To close this gap, the new guidance confirms that the Transitional UTPR Safe Harbour applies to fiscal years that begin on or before December 31, 2025, and end on or before January 3, 2027.

KPMG observation

This issue was clearly unintended and had been a cause of concern for affected MNEs. These MNEs will now be closely watching the timing of its enactment in jurisdictions’ domestic law. It also confirms that UTPR Safe Harbor is intended to apply to 53-week fiscal years.

⁴The Slovak Republic has implemented DAC9 and signed the GIR MCAA. The [OECD website](#) listing active bilateral exchange relationships identified the Slovak Republic as being able to receive the GIR from both EU member states and some non-EU jurisdictions but indicates it cannot share the GIR with other jurisdictions.

4 List of jurisdictions

The following jurisdictions are identified as expecting to be ready for central filing before May 31, 2026, and have signed up to the commitment to provide relief from penalties and local GIR filing.

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|--------------|------------------------|--------------------|
| 1. Australia | 12. Germany | 23. Norway |
| 2. Austria | 13. Gibraltar | 24. Poland |
| 3. Barbados | 14. Greece | 25. Portugal |
| 4. Belgium | 15. Hungary | 26. Romania |
| 5. Bulgaria | 16. Ireland | 27. Spain |
| 6. Canada | 17. Italy | 28. Sweden |
| 7. Croatia | 18. Japan ⁵ | 29. Switzerland |
| 8. Czechia | 19. Korea | 30. Slovenia |
| 9. Denmark | 20. Liechtenstein | 31. South Africa |
| 10. Finland | 21. Luxembourg | 32. Türkiye |
| 11. France | 22. Netherlands | 33. United Kingdom |

⁵ Japan has a Qualified IIR that applies from April 1, 2024, and MNEs will only be able to centrally file the GIR in Japan for fiscal years that begin on or after April 1, 2024.

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