

Tax alert

IRAS releases BEPS 2.0 Pillar Two registration form for MTT, DTT and GIR

Singapore has entered the operational phase of its BEPS 2.0 Pillar Two implementation, with the Inland Revenue Authority of Singapore (IRAS) releasing a one-time registration form and explanatory notes for in-scope multinational enterprise (MNE) groups under the Multinational Enterprise (Minimum Tax) Act 2024 (MMT Act) on 31 December 2025. This marks a critical compliance milestone for MNE groups preparing for the multinational enterprise top-up tax (MTT), domestic top-up tax (DTT) and global anti-base erosion (GloBE) information return (GIR).



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BEPS 2.0 Pillar Two in brief

Under the Organisation for Economic Cooperation and Development (OECD) BEPS 2.0 Pillar Two GloBE rules, large MNE groups are subject to a 15% minimum effective tax rate calculated on a jurisdictional basis. Singapore has implemented this via the MMT Act, introducing MTT and DTT (Singapore's equivalents of the income inclusion rule and qualified domestic minimum top-up tax).

The regime applies for financial years (FYs) beginning on or after 1 January 2025, to MNE groups with consolidated annual revenue of €750mn or more in at least two of the four FYs preceding the tested FY.

Registration requirement

An MNE group must register in Singapore if it:

- Meets the €750mn revenue threshold as mentioned above.
- Has at least one constituent entity (CE) or joint venture located in Singapore, or a reverse hybrid entity incorporated or registered in Singapore.

Registration covers MTT, DTT and the GIR, and is a one-time process.

The information required to complete the registration form is broadly aligned with expectations under the GloBE model rules and prior IRAS guidance, and covers the following sections:

- Part I: General information on the ultimate parent entity (UPE) and the MNE group
- Part II: MTT-related information (details of responsible members of the MNE group)
- Part III: DTT-related information (including identification of the designated GIR and DTT filing entity and in-scope entities)
- Part IV: GIR information (where the GIR will be filed)
- Part V: Tax residency changes after 30 November 2021
- Part VI: Declaration

What businesses need to know

Registration timeline

- Online registration is scheduled to open in May 2026 and must be completed within six months after the end of the first FY to which the MMT Act applies for the MNE group. For calendar year-end MNE groups, this means registration should be done between May (when the portal opens) and 30 June 2026.
- The UPE may appoint a Singapore CE or local tax agent to submit the registration form on its behalf, supported by a letter of authorisation.

Entity classification matters

- Part III of the form in relation to DTT requires identification of the Pillar Two entity classification (e.g., joint venture, minority-owned CE and reverse hybrid entity) for each CE in-scope of the DTT. Initial analysis will be needed before completing the form.

Tax residency changes after 30 November 2021

- Part V requests details (tax identification number, jurisdiction of tax residency and date of change) for Singapore incorporated or registered entities that changed tax residency after 30 November 2021. As this disclosure is not typically required under the GloBE model rules, a positive response may attract enhanced scrutiny.
- Robust contemporaneous documentation supporting the commercial rationale for any such change should be maintained.

Penalties and compliance

- A surcharge of 10% on the DTT and MTT (if applicable) may be imposed where an in-scope MNE group fails to notify the IRAS of its registration liability.
- The IRAS will process registrations within approximately one month of receiving complete information; incomplete submissions may delay processing.

Next steps for a smooth registration

- Start early on data: The form requires non routine data (e.g., entity classifications and tax residency histories). Early entity classification and information collation will help to reduce downstream risk or delayed processing risk, especially for in-scope calendar-year end MNE groups that must complete the registration by 30 June 2026.
- Governance over designations: Set clear roles and access for the designated GIR and DTT filing entity, including Corppass readiness and a defined contact person.
- Taking action now will simplify the registration process and position your organisation for a seamless start when the portal opens.

If you would like to know more about the issues discussed or EY services, please contact one of the following or your usual EY contact:

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