■ 국제조세조정에 관한 법률 시행규칙 [별지 제54호서식] <개정 2025. 3. 21.>

Reports may also be submitted through HOMETAX(www.hometax.go.kr).

GloBE Information Return

※ Please fill out this form by referring to the notes and instructions on the back page, and do not fill out the shaded areas.
※ Please mark "√" in the [ ] where applicable.

(Front)

Receipt Number	Filing date

1. Information of Filing Entity

① Tax Identification Number		② Telephone Number	
③ Name of Filing Entity		④ E-mail	
⑤ Name of Representative		⑥ Address	
⑦ Fiscal Year	. . . ~ . . .		
⑧ Entity Type	1. Designated Local Entity (Yes / No) 2. Type of Entity (a) Parent Entity [ ] (b) Transparent Entity [ ] (c) Hybrid Entity [ ] (d) Permanent Establishment [ ] (e) Others [ ]	⑨ Report Category	1. Regular filing [ ] 2. Amended filing [ ] 3. Late filing [ ]

2. Information of Filing Agent(s)

⑩ Name of Agent	⑪ TIN of Agent	⑫ Contact Person	⑬ Telephone Number	⑭ E-mail

The Filing Entity confirms that the GloBE Information Return is reported in accordance with Article 83 (1) and 83 (2) of the 「ADJUSTMENT OF INTERNATIONAL TAXES ACT」 and the contents have been accurately entered and fully reviewed to the best knowledge of the Filing Entity.

Year Month date

Filing Entity(Corporation) (Seal)

Filing Entity(Representative) (Signature or Seal)

The Filing Agent as a qualified tax professional confirms that the tax return has been prepared diligently and in a fair manner.

Filing Agent (Signature or Seal)

Head of Tax Office

Notes

This form and its annex(es) shall be prepared by each Constituent Entity or Designated Local Entity in accordance with Art. 83 (1) and (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and submitted through the Information and Communications Network System under Art. 2 18 of the FRAMEWORK ACT ON NATIONAL TAXES. For any matters not specified in this form and its annex, the guidelines established in the Multilateral Competent Authority Agreement on Exchange of GloBE Information (GIR MCAA) and the GIR XML Schema User Guide shall be followed.

Instructions

1. ①-⑥ should be filled based on the status as of the date of filing.
2. ⑦ Enter the start and end dates of the year that is subject to reporting.
3. ⑧ Enter an "√" if the Filing Entity is classified as a Designated Local Entity, and also enter an "√" in the relevant box according to the type of the Filing Entity.
4. ⑨ Enter an "√" in the relevant box.
5. ⑩ to ⑭ Provide information regarding the agent filing this form and its annex(es) on behalf of the Filing Entity based on the status as of the date of filing.

■ 국제조세조정에 관한 법률 시행규칙 [별지 제54호서식 부표 1] <개정 2025. 3. 21.>

Reports may also be submitted through HOMETAX(www.hometax.go.kr).

※ Please fill out this form by referring to the instructions below.

Fiscal Year	. . . ~ . . .	GloBE Information Return Information of Domestic Entities Other than Designated Local Entities	Name of Filing Entity	
			Tax Identification Number	

No.	① Tax Identification Number	② Name of Filing Entity	③ Name of Representative	④ Address	⑤ Telephone Number	⑥ E-mail
1						
2						
3						
4						
5						
6						
7						
8						
9						

Instructions

1. ①-⑥ In the case where a Designated Local Entity submits the GloBE Information Return to the head of the relevant tax office, the information of each domestic entities other than the Designated Local Entity shall be provided as of the date of filing.

■ 국제조세조정에 관한 법률 시행규칙 [별지 제54호서식 부표 2] <개정 2025. 3. 21.>

Reports may also be submitted through HOMETAX(www.hometax.go.kr).

※ Please fill out this form by referring to the instructions on the back page.

Fiscal Year	. . . ~ . . .	**GloBE Information Return**	Name of Filing Entity	
			Tax Identification Number	

1. MNE Group Information

1.1 Identification of the Filing Constituent Entity

1. UPE is the Filing Constituent Entity	2. Name of the Filing Constituent Entity	3. Tax identification number	4. Role	5. Jurisdiction where the Filing CE is located	6. Recipient Jurisdictions for Exchange of Information (if relevant)
Yes/No					

1.2 MNE Group General Information

1.2.1 MNE Group and Reporting Fiscal Year

1. Name of the MNE Group	2. Start date of the Reporting Fiscal Year	3. End date of the Reporting Fiscal Year	4. Amended Return
			Yes/No

1.2.2 MNE General accounting information

1. Consolidated Financial Statements of the UPE (type)	2. Financial Accounting standard used for the CFS of the UPE	3. Presentation currency used for the CFS of the UPE (ISO code)

1.3 Corporate Structure

1.3.1 Ultimate Parent Entity

1. UPE Jurisdiction	
2. Applicable rules?	
3. Name of the UPE	
4. TIN of the UPE	
5. TIN of the UPE in the Filing Jurisdiction(if different, and if any)	
6. Status for GloBE purposes	
7. If the UPE is an Excluded Entity – Type	
8. Jurisdiction under Art. 103 (4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT (if any)	

1.3.2 Group Entitties(other than the UPE) and members of JV Groups

1.3.2.1 Constituent Entities and members of JV Groups

Changes	1. Changes from previous Reporting Fiscal Year?	*Yes/No*
Jurisdiction	2. Jurisdiction	
	3. Applicable rules?	
Identification of the Constituent Entity, JV or JV Subsidiary	4. Name of Constituent Entity, JV or JV Subsidiary	*KR/ENG*
	5. TIN	
	6. TIN for filing jurisdiction(if any)	
	7. Status for GloBE purposes	
Ownership structure of the Constituent Entity, JV or JV Subsidiary	For each entity holding Ownership interests in the Constituent Entity, JV or JV Subsidiary: 8. Type 9. TIN (for CEs or members of JV Groups) 10. Ownership interest held (percentage)	
If the CE is a POPE or an Intermediate Parent Entity, is the Entity required to apply a QIIR?	11. Parent Entity Status	
	12. If the exception provided in Art. 72 (3), (4) of ADJUSTMENT OF INTERNATIONAL TAXES ACT shall apply, such that the UPE applies the IIR or there is another Intermediate Parent Entity required to apply the IIR, identify the UPE or the other Intermediate Parent Entity (TIN)	
	13. If the exception provided in Art. 72 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT shall apply, identify the other POPE required to apply a QIIR (TIN)	
Is UTPR applicable in respect of the entity?	14. Initial phase of International Activity applicable? (Art. 82 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT)	*Yes/No*
	15. Aggregate Ownership Interests (respectively Allocable Share of Top-up Taxes) of Parent Entities required to apply a QIIR in respect of the CE (respectively member of JV Group) (in percentage)	
	16. Are the UPE's Ownership Interests in the CE (respectively UPE's allocable share of Top-up Tax for the member of JV Group) greater the aggregate Ownership Interests (respectively allocable share) of Parent Entities required to apply a QIIR in that CE (respectively member of JV group)?	*Yes/No*

1.3.2.2 Excluded Entities

1. Changes from previous Reporting Fiscal Year?	*Yes/No*
2. Name of the Excluded Entity	
3. Type of the Excluded Entity	

1.3.3 Changes in the corporate structure that occurred during the Reporting Fiscal Year

a.	Were changes in the corporate structure that occurred during the Reporting Fiscal Year not reported because they neither affected the ETR computation or the computation or allocation of Top-up Tax?	*Yes/No*

1. Name of the Constituent Entity (or other Entity of the MNE Group) or member of JV Group	2. TIN	3. Effective Date of the change	4. Status for GloBE purposes before the change	5. Status for GloBE purposes after the change	6. Entities holding Ownership interests in that CE (or other Entity) or member of JV Group before or after the change	7. Ownership Interests held in that CE (or other Entity) or member of JV Group before the change (Percentage)	8. Ownership Interests held in that CE (or other Entity) or member of JV Group after the change (Percentage)

1.4 High-level summary of GloBE Information

1. Name of the jurisdiction (ISO)	2. Type of subgroup (if any)	3. Identification of subgroup (if any)(TIN)	4. Name(s) of jurisdiction(s) with taxing rights (ISO)	5. Safe harbour or exclusion applied?	6. ETR range	7. Has application of Substance-based Income Exclusion resulted in no Top-up Tax arising?	8. Top-up Tax payable (QDMTT) - range	9. Top-up Tax payable (GloBE Rules)-range
				[Insert relevant option]	*[Insert relevant option]*		*[Insert relevant option]*	*[Insert relevant option]*
				(a)~(h)	*(a)~(m)*	*Yes/No*	*(a)~(i)*	*(a)~(i)*

2. Jurisdictional Safe Harbours and Exclusions

Jurisdictional safe harbours and exclusions – Jurisdictional schedules

The Filing Constituent Entity shall complete Section 2 on a jurisdictional basis, for each jurisdiction where exceptions to the GloBE computation apply.

2.1 Characteristics of the jurisdiction

1. Name of the jurisdiction	
2. Type of subgroup(if any)	
3. Identification of subgroup(if any)	
4. Jurisdiction with taxing rights	
5. Existence of reportable differences (Yes/No)	*Yes/No*

2.2 Jurisdictional exceptions applicable in respect of this jurisdiction (Top-up Tax reduced to zero)

2.2.1 Safe harbour jurisdiction election

2.2.1.1 Safe harbour election

1. Safe Harbour elected	*[insert the relevant option] (a)~(h)*

2.2.1.2 Permanent safe harbours

(a) Simplified Calculation for Non-material Constituent Entities

	1. Total Revenue of all NMCEs in the jurisdiction	2. Aggregate Simplified Tax of all NMCEs in the jurisdiction
a. Reporting Fiscal Year		
b. 1st preceding Fiscal Year (if applicable)		*n.a.*
c. 2nd preceding Fiscal Year (if applicable)		*n.a.*
d. Average of the three Fiscal Years (if applicable)		*n.a.*

2.2.1.3 Transitional safe Harbours

(a) Transitional CbCR safe harbour

1. Total Revenue	
2. Profit (Loss) before Income Tax	
3. Simplified Covered Taxes (Art.86 (6) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	

(b) Transitional UTPR safe harbour

1. Corporate income tax rate	

2.2.2 Election for de minimis exclusion

☐ Election to apply the de minimis exclusion for the Reporting Fiscal Year

☐ Simplified Calculations for Non-material Constituent Entities - Constituent Entities that are not NMCEs

	1. Revenue (Financial Accounts)	2. GloBE Revenue	3. Financial Accounting Net Income (or Loss)	4. GloBE Income(or Loss)
a. Reporting Fiscal Year				
b. 1st preceding Fiscal Year (if applicable)				
c. 2nd preceding Fiscal Year (if applicable)				
d. Average of the three Fiscal Years (if applicable)				

2.3 MNE Group in the initial phase of international activity (if applicable)

1. First day of the First Fiscal Year in which the MNE Group originally came within the scope of GloBE Rules	
2. Reference Jurisdiction	
3. Net Book Value of Tangible Assets in Reference Jurisdiction for the Fiscal Year in which the MNE Group originally comes within the scope of GloBE Rules	
4. Number of jurisdictions where the MNE Group has Constituent Entities for the Fiscal Year in which the MNE Group originally comes within the scope of GloBE Rules	
5. Tangible Assets of Constituent Entities located outside the Reference Jurisdiction for the Fiscal Year in which the MNE Group originally comes within the scope of GloBE Rules	a. Jurisdiction
	b. Net Book Values of Tangible Assets of all Constituent Entities located in each jurisdiction
6. Number of jurisdictions where the MNE Group has Constituent Entities during the Reporting Fiscal Year	
7. Sum of the Net Book Values of Tangible Assets of all Constituent Entities located in other jurisdictions than the Reference Jurisdiction during the Reporting Fiscal Year	

3. GloBE Computations

GloBE Computations – Jurisdictional schedules

The Filing Constituent Entity shall complete Section 3 on a jurisdictional basis, for each jurisdiction (or subgroup, where relevant) where exceptions to the GloBE computation do not apply.

3.1 Characteristics of the jurisdiction

1. Name of the jurisdiction	
2. Type of subgroup (if any)	
3. Identification of subgroup (if any) for the ETR and Top-up Tax computation	
4. Jurisdictions with taxing rights	
5. ETR	
6. Adjusted Covered Taxes	
7. Net GloBE Income or Loss	
8. Substance-based Income Exclusion	
9. Additional Current Top-up Tax	
10. Top-up Tax amount under domestic legislation	
11. Elections	
12. Aggregate current tax expense with respect to Covered Taxes after allocations in Art. 111 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT	
13. Qualified Refundable Tax Credits or Marketable Transferable Tax Credits (tax expense)	
14. Other tax credits (tax expense)	
15. Deferred tax expense amount	
16. Qualified Refundable Tax Credits or Marketable Transferable Tax Credits (income)	
17. Excess Negative Tax Expense Carry Forward	
18. Transition Rules	

3.2 ETR computation

3.2.1 ETR

a. Financial Accounting Net Income or Loss	b. Net GloBE Income or Loss	c. Income tax expense	d. Adjusted Covered Taxes	e. ETR
	[A]		*[B]*	*[C]=[B]/[A]*

3.2.1.1 Computation of GloBE Income (Loss)

1. Aggregate FANIL amount after allocations in Art 66 (4) through (7) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT (All CEs in the jurisdiction)	
2. Adjustments	Net amount
(a) Net Taxes Expense (Form① of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(b) Excluded Dividends (Form② of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(c) Excluded Equity Gain or Loss (Form④ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(d) Included Revaluation Method Gain or Loss (Form⑤ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(e) Gain or loss from disposition of assets and liabilities excluded (Art. 76 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 129 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(f) Asymmetric Foreign Currency Gains or Losses (Form⑥ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(g) Policy Disallowed Expenses (Form③ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(h) Prior Period Errors (Form⑭ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(i) Changes in Accounting Principles (Form⑭ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(j) Accrued Pension Expense (Form⑦ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(k) Debt releases (Form⑪ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(l) Stock-based compensation (Form⑧ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(m) Arm's length adjustments (Form⑰ the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(n) Qualified Refundable Tax Credit or Marketable Transferable Tax Credit (Form⑫, ⑬ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(o) Election for Gains and losses using realisation principle (Form⑯ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(p) Election for Adjusted Asset Gain (Form⑩ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(q) Intragroup Financing Arrangement expense (Form⑨ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(r) Election for intragroup transactions in same jurisdiction (Form⑮ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(s) Insurance company taxes charged to policyholders (Form⑱ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(t) Increase/decrease to equity attributed to Additional Tier One and Restricted Tier One Capital distributions paid/payable or received/receivable (Form⑲ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(u) Constituent Entities joining and leaving an MNE Group (Art. 128 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(v) Reduction of GloBE Income of the UPE that is a Flow-through Entity (Art. 77-2 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 133 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(w) Reduction of GloBE Income of the UPE that is subject to a Deductible Dividend Regime (Art. 77-2 (1) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 132 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(x) Taxable Distribution Method election (Art. 79 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 137 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(y) International Shipping Income (Art. 66 (3) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 106 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(z) Transactions between Constituent Entities (Art. 89 2, 4 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
3. Net GloBE Income (Loss) of the Jurisdiction	

3.2.1.2 Computation of Adjusted Covered Taxes

(a) Total Amount of Adjusted Covered Taxes	
1. Aggregate Current tax expense with respect to Covered Taxes after allocations in Art. 111 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT (All CEs in the jurisdiction)	
2. Adjustments	Net amount
(a) Covered Tax accrued as an expense in the profit before taxation in the financial accounts (Art. 110 1 a. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(b) GloBE Loss Deferred Tax Asset established or used (Art. 67 (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT, Art. 113-3 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(c) Covered Taxes for uncertain tax position recorded as a reduction to Covered Taxes in prior year (Art. 110 1 b. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(d) Qualified Refundable Tax Credit or Marketable Transferable Tax Credits recorded as a reduction to current tax expense (Art. 110 1 c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(e) Qualified Flow-through Tax Benefits of Qualified Ownership Interests (Form④ g through j of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(f) Current tax expense on income excluded from GloBE Income or Loss (Art. 110 2 a. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(g) Non-Qualified Refundable Tax Credit, Non-Marketable Transferable Tax Credit or Other Tax Credits not recorded as a reduction to current tax expense (Art. 110 2 b. and c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(h) Covered Taxes refunded or credited (except for any Qualified Refundable Tax Credit, or Marketable Transferable Tax Credits) not treated as an adjustment to current tax expense (Art. 110 2 d. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(i) Current tax expense related to uncertain tax position (Art. 110 2 e. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(j) Current tax expense not expected to be paid within three years (Art. 110 2 f. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(k) Post-filing adjustments (Art. 68 (1) and (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(l) Covered Taxes relating to Net Asset Gain or Net Asset Loss (Form ⑩ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(m) Reduction of Covered Taxes of the UPE that is a Flow-through Entity (Art. 133 (3),(4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(n) Covered Taxes for GloBE Income of the UPE that is reduced under a Deductible Dividend Regime (Art. 132 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(o) Deemed Distribution Tax (Art. 134 (7) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(p) Taxable Distribution Method election (Art. 137 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(q) Total Deferred Tax Adjustment Amount (Art. 67 (2), (3), (7) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(r) Increase or decrease in Covered Taxes recorded in equity or Other Comprehensive Income relating to amounts included in GloBE Income or Loss that will be subject to tax under local tax rules (Art. 110 3 b. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(s) Excess Negative Tax Expense Carry Forward generated (Art. 116-2 and Art. 119 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(t) Decrease in Covered Taxes (but not below zero) by the remaining balance of the Excess Negative Tax Expense Carry-forward (Art. 116-2 and Art. 119 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
3. Adjusted Covered Taxes	

(b) Excess Negative Tax Expense Carry-forward

1. Balance from prior years	[A]
2. Excess Negative Tax Expense Carry-forward generated in the reporting fiscal year	[B]
3. Excess Negative Tax Expense Carry-forward utilised for the reporting fiscal year	[C]
4. Excess Negative Tax Expense Carry-forward remaining for subsequent years	[D]=[A]+[B]-[C]

(c) Transitional Blended CFC Regime calculation (if any)

1. CFC Jurisdictions	2. Subgroup	3. Aggregated taxes allocated to that subgroup under a Blended CFC Tax Regime
Total		

3.2.2 Jurisdictional computations relating to deferred tax accounting

3.2.2.1 Deferred Tax adjustments

(a) High-level summary

1. Deferred tax expense for GloBE purposes before recasting and adjustments (Art. 112 (1) 1 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	a. Deferred tax expense in the financial accounts	[A]
	b. Deferred tax expense in relation to assets or liabilities for which the GloBE carrying value is different to the accounting carrying value	[B]
	c. Deferred tax expense based on the GloBE carrying value of assets or liabilities	[C]
	d. Deferred tax expense for GloBE purposes before recasting and adjustments	[D]=[A]-[B]+[C]
2. Total amount of the adjustments		[E]
3. Recasting the deferred tax expense to the Minimum Rate	e. Deferred Tax expense for GloBE purposes before recasting	[F]=[D]+[E]
	f. Difference between deferred tax expense recorded at a lower tax rate than the Minimum Rate and recast at Minimum Rate	[G]
	g. Difference between the deferred tax expense recorded at a higher tax rate than the Minimum Rate and recast at Minimum Rate	[H]
4. Total Deferred Tax Adjustment Amount		[I]=[F]+[G]-[H]

(b) Breakdown of the adjustments

1. Adjustments to deferred tax expense	Net Amount
(a) Deferred tax expense related to items excluded from GloBE Income or Loss (Art. 112 (1) 1-2 a. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(b) Deferred tax expense related to Disallowed Accruals (Art. 112 (1) 1-2 c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 71 (5) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(c) Deferred tax expense related to Unclaimed Accruals (Art. 112 (1) 1-2 b. 4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(d) Valuation adjustment or accounting recognition adjustment related to a deferred tax asset (Art. 112 (1) 1-2 b. 1) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(e) Deferred tax expense arising from a re-measurement related to changes in the tax rate (Art. 112 (1) 1-2 b. 2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(f) Deferred tax expense related to the generation and use of tax credits (Art. 112 (1) 1-2 b. 3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(g) Substitute Loss Carry Forward DTA or deemed Substitute Loss Carry Forward DTA (Art. 71 (1) through (3) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(h) Disallowed Accruals or Unclaimed Accruals paid during the fiscal year (Art. 112 (1) 2 a. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(i) Recapture Deferred Tax Liability paid during the fiscal year (Art. 112 (1) 2 b. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(j) Recognition of a loss Deferred Tax Asset not included in the financials (Art. 112 (1) 3 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(k) Deferred tax expense adjustment resulting from a reduction to a tax rate (Art. 116 1 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(l) Deferred tax expense adjustment resulting from an increase to a tax rate (Art. 116 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(m) Constituent Entities joining and leaving an MNE Group (Art. 80 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(n) Deferred tax expense of the UPE that is a Flow-through Entity (Art. 133 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(o) Deferred tax expense of the UPE that is subject to Deductible Dividend Regime (Art. 132 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
(p) Deferred tax adjustment resulting from transactions between Constituent Entities (Art. 89 2 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
2. Total amount of the adjustments	*[E]*

(c) Loss carry backs

	1. Deemed deferred tax assets attributable to loss carry backs	2. Covered Tax refund relating to loss carry backs
a. Amount attributed to Prior Fiscal Year X		
b. Amount attributed to Prior Fiscal Year Y, etc.		
:		
c. Total		

3.2.2.2 Recapture mechanism

(a) Annual amounts of DTLs subject to recapture rule

1. Amount of DTLs subject to recapture rule claimed in the fifth Fiscal Year preceding the Reporting Fiscal Year	*[A]*
2. Amount of Recaptured Deferred Tax Liability determined in the Reporting Fiscal Year in relation to the fifth Fiscal Year preceding the Reporting Fiscal Year	*[B]*
3. Amount of DTLs subject to recapture rule claimed for the Reporting Fiscal Year	*[C]*

(b) Aggregate DTL Recapture accounts

	1. Reporting Fiscal Year	2. Prior Fiscal Year
a. Amount of pre-Transition Year DTLs (Art. 113-2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, Art. 74-2 (5) 3 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
b. Amount of Outstanding Balance (Art. 113-2 (1) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
c. Amount of Unjustified Balance (Art. 113-2 (1) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		

3.2.2.3 Transition rules

1. Transition Year	

(a) Application of Art. 81 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT & Art. 139 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT

Deferred tax liabilities	
1. Deferred tax liabilities at the beginning of the Transition Year	2. Deferred tax liabilities recast at the Minimum Rate (if applicable)

Deferred tax assets			
3. Deferred tax assets at the beginning of the Transition Year	4. Deferred tax assets recast at the Minimum Rate (if applicable)	5. Deferred tax assets arising from excluded items under Art. 89 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT	6. Deferred tax assets taken into account for GloBE purposes
[A]	*[B]*	*[C]*	*[D] = [[A] or [B], if applicable] - [C]*

(b) Application of Art. 89 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT

1. Jurisdiction of the disposing entities	2. Tax paid in respect of the transaction(s)	3. Net Deferred tax asset or liability reflected in the financial accounts of the disposing CE(s)	4. Carrying Value of the transferred assets for GloBE purposes	5. Net Deferred tax asset or liability is determined with respect to the transferred assets for GloBE purposes for acquiring CE(s)

3.2.3 Jurisdictional elections (if any)

3.2.3.1 Jurisdictional elections (other than Art. 78 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT)

(a) Elections

1. Annual elections	
a. Aggregate asset gain election (Form⑩ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
b. Immaterial decrease in Covered Taxes election (Art. 68 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
c. Election not to apply the Substance-based Income Exclusion (Art. 75 (14) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
d. Negative Tax Expense Carry-forward (Art. 119 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	

2. Five-year Elections	3. Election Year	4. Revocation Year
e. Equity Investment Inclusion Election (Form④ d. of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
f. Stock-based compensation election (Form⑧ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
g. Realisation principle election (Form⑯ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
h. Intra-group transactions election (Form⑮ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
i. Election not to allocate cross-border deferred tax		

5. Other elections	6. Election Year	7. Revocation Year
j. GloBE Loss Election (Art. 67 (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 113 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		

(b) Information requirements related to jurisdictional elections

1. Inclusion of equity gain or loss with respect to an Equity Investment Inclusion Election	
2. Balance of the owner's investment in a Qualified Ownership Interest from prior years	*[A]*
3. Additions to the owner's investment in a Qualified Ownership Interest	*[B]*
4. Reductions to the owner's investment in a Qualified Ownership Interest	*[C]*
5. Outstanding balance of the owner's investment in a Qualified Ownership Interest	*[D]=[A]+[B]-[C]*

3.2.3.2 Election for Art. 78 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT

1. Deemed Distribution Tax election (Art. 78 (1) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT)	☐

(a) Recapture mechanism for Art. 134 (2), (4) through (8) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, Art. 83 (1) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT

1. Fiscal Year	2. Deemed Distribution Tax determined under Art. 134 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT	3. Deemed Distribution Tax paid or used				4. Outstanding balance of a Deemed Distribution Tax Recapture Account
		3rd preceding Fiscal Year	2nd preceding Fiscal Year	1st preceding Fiscal Year	Reporting Fiscal Year	
4th preceding Fiscal Year						
3rd preceding Fiscal Year		Not applicable				
2nd preceding Fiscal Year		Not applicable	Not applicable			
1st preceding Fiscal Year		Not applicable	Not applicable	Not applicable		
Reporting Fiscal Year		Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

(b) Application of Art. 83 (2) through (4) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT

1. Reduction to the Adjusted Covered Taxes for a prior Fiscal Year	2. Incremental Top-up tax	3. Disposition Recapture Ratio
[A]	*[B]*	*[C]*

3.2.4 Constituent Entity Computations

(a) Election for the transitional simplified jurisdictional reporting framework

1. Does the MNE Group elect to apply the transitional simplified jurisdictional reporting framework?	*Yes/No*

(b) Aggregated Reporting for Tax Consolidated Groups

1. Tax Consolidated Group(TIN)	2. Consolidated Entities(TIN)

3.2.4.1 GloBE Income or Loss

(a) Adjustments to the Financial Accounts Net Income or Loss

1. CE or member of JV Group (TIN)		
2. FANIL amount after allocations in Art. 66 (4) through (7) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 107 & 108 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT		
3. Adjustments	Additions	Reductions
(a) Net Taxes Expense (Form① of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(b) Excluded Dividends (Form② of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(c) Excluded Equity Gain or Loss (Form④ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(d) Included Revaluation Method Gain or Loss (Form⑤ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(e) Gain or loss from disposition of assets and liabilities excluded (Art. 76 (2) through (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 129 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(f) Asymmetric Foreign Currency Gains or Losses (Form⑥ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(g) Policy Disallowed Expenses (Form③ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(h) Prior Period Errors (Form⑭ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(i) Changes in Accounting Principles (Form⑭ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(j) Accrued Pension Expense (Form⑦ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(k) Debt releases (Form⑪ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(l) Stock-based compensation (Form⑧ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(m) Arm's length adjustments (Form⑰ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(n) Qualified Refundable Tax Credit or Marketable Transferable Tax Credits (Form⑫, ⑬ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(o) Election for Gains and losses using realisation principle (Form⑯ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(p) Election for Adjusted Asset Gain (Form⑩ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(q) Intragroup Financing Arrangement expense (Form⑨ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(r) Election for intragroup transactions in same jurisdiction (Form⑮ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(s) Insurance company taxes charged to policyholders (Form⑱ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(t) Increase/decrease to equity attributed to Additional Tier One and Restricted Tier One Capital distributions paid/payable or received/receivable (Form⑲ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(u) Constituent Entities joining and leaving an MNE Group (Art. 128 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(v) Reduction of GloBE Income of the UPE that is a Flow-through Entity (Art. 77-2 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 133 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(w) Reduction of GloBE Income of the UPE that is subject to a Deductible Dividend Regime (Art. 77-2 (1) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 132 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(x) Taxable Distribution Method election(Art. 79 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 137 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(y) International Shipping Income (Art. 66 (3) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 106 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(z) Transactions between Constituent Entities (Art. 89 2 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
4. GloBE Income (Loss) of the CE or member of JV Group		

(b) Cross-border allocation of income or loss between a Main Entity and a PE and from an FTE (Art. 66 (4) through (7) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 107&108 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)

1. CE or members of JV Groups located in this jurisdiction or stateless CE (TIN)	2. FANIL before the adjustment	3. Basis for the adjustment	4. Other CE or member of JV Group (TIN)	5. Jurisdiction of other CE or member of JV Group (ISO)	6. Additions to this CE	7. Reductions to this CE	8. FANIL after the adjustment

(c) Cross-border adjustments

1. CE or member of JV Group (TIN)	2. Basis for the adjustment	3. Other CE or member of JV Group (TIN)	4. Jurisdiction of other CE (ISO)	5. Additions to this CE	6. Reductions to this CE

(d) Adjustments to the GloBE Income of the UPE under Art. 77-2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT

1. CE (or member of JV Group) located in this jurisdiction (TIN)	2. Basis for reduction	3. Identification of holders of Ownership Interests or dividend recipients (see note)	4. Ownership interest directly held (in percentage)	5. Reductions for this CE

3.2.4.2 Adjusted Covered taxes

(a) Adjustments to the Current tax expense in the Financial Accounts

1. CE or member of JV Group (TIN)		
2. Current tax expense with respect to Covered Taxes after allocations in Art. 111 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT		
3. Adjustments	Additions	Reductions
(a) Covered Tax accrued as an expense in the profit before taxation in the financial accounts (Art. 110 1 a. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(b) Covered Taxes for uncertain tax position recorded as a reduction to Covered Taxes in prior year (Art. 110 1 b. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(c) Qualified Refundable Tax Credit or Marketable Transferable Tax Credits recorded as a reduction to current tax expense (Art. 110 1 c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(d) Qualified Flow-through Tax Benefits of Qualified Ownership Interests (Form④ g. through j. of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(e) Current tax expense on income excluded from GloBE Income or Loss (Art. 110 2 a. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(f) Non-Qualified Refundable Tax Credit Non-Marketable Transferable Tax Credits or Other Tax Credits not recorded as a reduction to current tax expense (Art. 110 2 b. and c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(g) Covered Taxes refunded or credited (except for any Qualified Refundable Tax Credit, or Marketable Transferable Tax Credits) not treated as an adjustment to current tax expense (Art. 110 2 d. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(h) Current tax expense related to uncertain tax position (Art. 110 2 e. the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(i) Current tax expense not expected to be paid within three years (Art. 110 2 f. the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(j) Post-filing adjustments (Art. 68 (1) and (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(k) Covered Taxes relating to Net Asset Gain or Net Asset Loss (Form⑩ a. of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(l) Reduction of Covered Taxes of the UPE that is a Flow-through Entity (Art. 133 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(m) Covered Taxes for GloBE Income of the UPE that is reduced under a Deductible Dividend Regime (Art. 132 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(n) Deemed Distribution Tax (Art. 134 (7) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(o) Taxable Distribution Method election (Art. 137 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(p) Total Deferred Tax Adjustment Amount (Art. 67 (2) through (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(q) Increase or decrease in Covered Taxes recorded in equity or Other Comprehensive Income relating to amounts included in GloBE Income or Loss that will be subject to tax under local tax rules (Art. 110 3 b. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
4. Adjusted Covered Taxes		

(b) Cross allocation of taxes

1. CE located in this jurisdiction or stateless CE (or member of JV Group) (TIN)	2. Covered Taxes of the CE (or member of JV Group) before the adjustment	3. Basis for the adjustment	4. Other CE (or member of JV Group) (TIN)	5. Jurisdiction of other CE (or member of JV Group) (ISO)	6. Additions to this CE	7. Reductions to this CE	8. Covered Taxes of the CE (or member of JV Group) after the adjustment

(c) Deferred tax expense

1. CE or member of JV Group (TIN)		
2. Deferred tax expense amount for GloBE purposes		
3. Adjustments to deferred tax expense	Additions	Reductions
(a) Deferred tax expense related to items excluded from GloBE Income or Loss (Art. 112 (1) 1-2 a. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(b) Deferred tax expense related to Disallowed Accruals (Art. 112 (1) 1-2 c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(c) Deferred tax expense related to Unclaimed Accruals (Art. 112 (1) 1-2 b 4.) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(d) Valuation adjustment or accounting recognition adjustment related to a deferred tax asset (Art. 112 (1) 1-2 b. 1) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(e) Deferred tax expense arising from a re-measurement related to changes in the tax rate (Art. 112 (1) 1-2 b. 2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(f) Deferred tax expense related to the generation and use of tax credits (Art. 112 (1) 1-2 b. 3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(g) Substitute Loss Carry Forward DTA or deemed Substitute Loss Carry Forward DTA (Art. 71 (1) through (3) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(h) Disallowed Accruals or Unclaimed Accruals paid during the fiscal year (Art. 112 (1) 2 a. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT		
(i) Recapture Deferred Tax Liability paid during the fiscal year (Art. 112 (1) 2 b. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT		
(j) Recognition of a loss Deferred Tax Asset not included in the financials (Art. 112 (1) 3 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT		
(k) Deferred tax expense adjustment resulting from a reduction to a tax rate (Art. 116 1 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(l) Deferred tax expense adjustment resulting from an increase to a tax rate (Art. 116 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(m) Constituent Entities joining and leaving an MNE Group (Art. 80 4 and 5 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(n) Deferred tax expense of the UPE that is a Flow-through Entity (Art. 133 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(o) Deferred tax expense of the UPE that is subject to Deductible Dividend Regime (Art. 132 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
(p) Deferred tax adjustment resulting from transactions between Constituent Entities (Art. 89 (2) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT		
4. Difference between deferred tax expense recorded at a lower tax rate than the Minimum Rate and recast at Minimum Rate		
5. Difference between the deferred tax expense recorded at a higher tax rate than the Minimum Rate and recast at Minimum Rate		
6. Total Deferred Tax Adjustment Amount		

3.2.4.3 Constituent Entity elections (or elections that apply to a JV Group)

1. Constituent Entities (or member of JV Group) for which an election is made (TIN)			
2. Annual Elections	a. Election to apply the Simplified Calculations for NMCEs (Simplified Calculations Safe Harbour)		
	b. Debt Release election (Form⑪ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
	c. Unclaimed Accrual Election (Art. 112 (1) 1-2 b. 4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
3. Five-Year Elections		4. Election Year	5. Revocation Year
	d. Not treating an Entity as an Excluded Entity election (Art. 62 (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
	e. Inclusion of all dividends with respect to Portfolio Shareholdings (Form② c. of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
	f. Treating foreign exchange gains or losses attributable to hedging as an Excluded Equity Gain or Loss (Form④ b. of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
	g. Investment entity tax transparency election (Art. 79 (5) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 136 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
	h. Taxable distribution method election (Art. 79 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 137 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
	i. Unclaimed Accrual Five-Year election (Art. 112 (1) 1-2 b. 4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		
4. Other Elections	j. GloBE Loss Election (Art. 67 (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT, Art. 113-3 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)		

k. Fair value election (Art. 76 (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT, Art. 129 (4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)

1. Constituent Entities (members of JV Groups) for which the election is made (TIN)	2. Fiscal Year of the triggering event	3. Inclusion in the Fiscal Year of the triggering event as provided under Art. 129 (4) 3 a. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) or 5-year inclusion (as provided under Art. 129 (4) 3 b. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)

3.2.4.4 International shipping income exclusion

(a) International shipping income exclusion

1. CE or member of JV Group located in this jurisdiction (TIN)		
International shipping income	2. Category (Art. 106 (1) 1 through 6 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
	3. Revenue	*[A]*
	4. Costs	*[B]*
	5. International Shipping Income	*[C]=[A]-[B]*
Qualified Ancillary International Shipping Income	6. Category (Art. 106 (2) 1 through 5 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
	7. Revenue	*[D]*
	8. Costs	*[E]*
	9. Qualified Ancillary International Shipping Income	*[F]=[D]-[E]*
Effect on substance-based income exclusion	10. Payroll costs attributable to the excluded International Shipping Income or Qualified Ancillary International Shipping Income	
	11. Carrying value of tangible assets used in the generation of the excluded International Shipping Income or Qualified Ancillary International Shipping Income	
Covered taxes	12. Covered taxes attributable to the excluded International Shipping Income or Qualified Ancillary International Shipping Income	

(b) Jurisdictional cap for the qualified ancillary international shipping income exclusion

1. Total International Shipping Income for all CEs (or members of JV Group)	*[A]*
2. 50% cap	*50%x[A]*
3. Total Qualified Ancillary International Shipping Income for all CEs (or members of JV Group)	*[B]*
4. Excess of the cap if B exceeds 50% of A	*[B]-50%x[A]*

3.2.4.5 Information for purposes of Taxable Distribution Method Election (if applicable)

Taxable Distribution Method Election

1. Constituent Entity-owner (or member of JV Group) for which an election is made (TIN)	2. Investment Entity for which the election is made (TIN)	3. Actual and deemed distributions of the Investment Entity's GloBE Income received by the Constituent Entity-owner	4. Local Creditable Tax Gross-up incurred by the Investment Entity	5. Constituent Entity-owner's proportionate share of the Investment Entity's Undistributed Net GloBE Income

3.2.4.6. Other Accounting Standard

1. Constituent Entity (or member of JV Group) with FANIL based on a different accounting standard (TIN)	2. Acceptable or Authorised Financial Accounting Standard

3.3 Top-up Tax computation

3.3.1 Top-up Tax

a. Top-up Tax Percentage	b. Substance- based Income Exclusion	c. Excess Profits	d. Additional Current Top-up Tax	e. QDMTT payable	f. Top-up Tax
[A]=15% - ETR	*[B]*	*[C] = Net GloBE Income or Loss-[B]*	*[D]*	*[E]*	*={[A]×[C]}+[D]-[E]*

3.3.2 Computation of Substance-based Income Exclusion (if applicable)

3.3.2.1 Total amount of Substance Based Income Exclusion

Payroll carve-out		Tangible Assets carve-out		Total
1. Relevant Eligible Payroll Costs of Eligible Employees performing activities in the Jurisdiction	2. Application of relevant mark-up percentage for the Reporting Fiscal Year	3. Carrying value of relevant Eligible Tangible Assets located in the jurisdiction	4. Application of relevant mark-up percentage for the Reporting Fiscal Year	5. Substance-based Income Exclusion
[A]	*[B]*	*[C]*	*[D]*	*[E]=[A]x[B]+[C]x[D]*

3.3.2.2 Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets to Permanent Establishments for purposes of the Substance Based Income Exclusion

1. Relevant Eligible Payroll Costs	2. Carrying value of relevant Eligible Tangible Assets	3. Jurisdiction of PEs	4. Relevant Eligible Payroll Costs allocated to PEs	5. Carrying value of relevant Eligible Tangible Assets allocated to PEs

3.3.2.3 Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets of a Flow-through Entity for purposes of the Substance Based Income Exclusion

1. Relevant Eligible Payroll Costs	2. Carrying value of relevant Eligible Tangible Assets	3. Jurisdiction of CE owners (or members of JV Group)	4. Relevant Eligible Payroll Costs allocated to CE owner (or excluded)	5. Carrying value of relevant Eligible Tangible Assets allocated to CE owner (or excluded)

3.3.3 Additional Current Top-up Tax

3.3.3.1 Additional Current Top-up Tax for purposes other than Art. 119 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT

1. Relevant Articles	2. Relevant year	3. As previously reported or recalculated	4. Net GloBE Income/Loss	5. Adjusted Covered Taxes	6. ETR	7. Excess Profit	8. Top-up Tax Percentage	9. Top-up Tax	10. Additional Current Top-up Tax
	Prior Fiscal Year X	a. Previously Reported							
		b. Recalculated							

3.3.3.2 Additional Current Top-up Tax for purposes of Art. 119 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT

1. Adjusted Covered Taxes for the jurisdiction (if negative)	*[A]*
2. GloBE Loss for the Jurisdiction	*[B]*
3. Expected Adjusted Covered Taxes	*[C]=[B]×15%*
4. Additional Current Top-up Tax	*[D]=[C]-[A]*

3.3.4 QDMTT

1. Financial Accounting Standard			
2. QDMTT amount payable			
3. QDMTT Minimum Rate (if higher than 15%)			
4. Basis for the blending of income and taxes (if different from the GloBE Rules)			
5. Currency used (if different from CFS presentation currency)			
6. Five-year election to use the CFS presentation currency or the local currency	a. Currency	b. Election Year	c. Revocation Year
7. SBIE available?	*Yes / No*		
8. De-minimis available?	*Yes / No*		

3.4 Top-up Tax allocation and attribution (if any)

3.4.1 Application of the IIR in respect of this jurisdiction

1. Group Entity allocated Top-up Tax	a. LTCE or member of JV Group (TIN)		
	b. GloBE Income of the LTCE or member of JV Group	*[A]*	
	c. Top-up Tax of the Low-Taxed CE or the member of the JV Group	*[C] = [T] x [A]/[A+B etc]*	
2. Parent Entities required to apply a QIIR	a. Parent Entity (TIN)	*[Parent Entity 1]*	
	b. Parent Entity Jurisdiction	*Jurisdiction B*	
	c. The amount of GloBE Income attributable to Ownership Interests held by other owners	*[D]*	
	d. Parent Entity's Inclusion Ratio	*[F]=([A]-[D])/[A]*	
3. IIR Top-up Tax	a. Parent Entity's Allocable Share of the Top-up Tax	*[G]=[C]×[F]*	
	b. IIR Offset	*[H]*	
	c. Top-up Tax payable by Parent Entity	*[I]=[G]-[H]*	

3.4.2 Total UTPR Top-up Tax amount in respect of this jurisdiction

1. LTCE (or member of JV Group) for which Art. 73 (3) 1 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT does not apply (TIN)	
2. Top-up Tax taken into account for Art. 73 (3) 2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT	
3. Total UTPR Top-up Tax Amount in respect of this jurisdiction	

3.4.3 Attribution of Top-up Tax under the UTPR

1. UTPR Jurisdictions	2. UTPR Top-up Tax carry-forward	3. Number of Employees	4. Net Book Value of Tangible Assets	5. UTPR Percentage	6. UTPR Top-up Tax Amount attributed for the Reporting Fiscal Year	7. Additional cash tax expense incurred by CEs in UTPR jurisdiction	8. UTPR Top-up tax left to be carried forward
Total							

Instructions

1. MNE Group Information

1.1 Identification of Filing Constituent Entity

1.1.1 and 1.1.2	The Filing Constituent Entity is the one that files this GloBE Information Return. If multiple Filing Constituent Entities file the GloBE Information Return, each of them shall file a separate GloBE Information Return.
1.1.2 ~1.1.5	These columns shall not be completed if the Filing Constituent Entity is the UPE.
1.1.3	The Filing Constituent Entity shall identify its TIN used for purposes of Covered Taxes in the Filing Jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.
1.1.4	The relevant option shall be selected: • Designated Filing Entity • Designated Local Entity • Constituent Entity
1.1.5	The Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction where it is located.
1.1.6	The Filing Constituent Entity shall identify the jurisdictions in which filing obligations of Constituent Entities are intended to be met through exchange of information under Art. 83 (3) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT.

1.2 MNE Group General Information

1.2.1 MNE Group and Reporting Fiscal Year

1.2.1.1	The Filing Constituent Entity shall report the name of the MNE Group that is commonly used in the preparation of the Consolidated Financial Statements.
1.2.1.2	The Filing Constituent Entity shall report the start date of the Reporting Fiscal Year.
1.2.1.3	The Filing Constituent Entity shall report the end date of the Reporting Fiscal Year.
1.2.1.4	The Filing Constituent Entity shall report “Yes” if the GloBE Information Return being filed is an amended return.

1.2.2 MNE General accounting information

1.2.2.1	The Filing Constituent Entity shall report the relevant Subparagraph 1 to 4 of the definition of Consolidated Financial Statements in Art. 100 (4) 1 through 4 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT that applies to the Consolidated Financial Statements of the UPE. When Subparagraph 4 applies, the Filing Constituent Entity shall use reasonable diligence and good faith efforts for purposes of the identification of the UPE.
1.2.2.2	The Filing Constituent Entity shall report the Financial Accounting Standard that is used for the Consolidated Financial Statements of the UPE. If the UPE does not prepare Consolidated Financial Statements, the Filing Constituent Entity shall report the Authorised Financial Accounting Standard that is used for purposes of the GloBE Rules. (In other words, the Filing Constituent Entity prepares accounting standards used in financial statements in accordance with each item of Art. 100 (4) 4 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.)
1.2.2.3	The Filing Constituent Entity shall report the ISO code of the currency that is used for the Consolidated Financial Statements of the UPE. If the UPE does not prepare Consolidated Financial Statements, the Filing Constituent Entity shall report the ISO code of the currency that is used for purposes of the GloBE Rules.(In other words, the Filing Constituent Entity prepares accounting standards used in financial statements in accordance with each item of Art. 100 (4) 4 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT).

1.3 Corporate Structure

1.3.1 Ultimate Parent Entity

1.3.1	The information in the table shall be reported as of last day of the Reporting Fiscal Year. If the MNE Group is a Multi-Parented MNE Group, the Filing Constituent Entity shall complete this table for each UPE.
1.3.1.1	The Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction where the UPE is located for GloBE purposes.

	Instructions
1.3.1.2	The Filing Constituent Entity shall report whether the UPE jurisdiction has a QIIR, QUTPR and/or QDMTT in force for the Reporting Fiscal Year. The relevant option(s) shall be selected: (i) QIIR applicable to Low-Taxed Constituent Entities located in other jurisdictions only; (ii) QIIR applicable to both Low-Taxed Constituent Entities located in other jurisdictions and in the jurisdiction of the Parent Entity; (iii) QUTPR; (iv) QDMTT If more than one option is relevant, the Filing Constituent Entity shall select all relevant options.
1.3.1.1 and 1.3.1.2	The Filing Constituent Entity shall not report this information if the UPE is an Excluded Entity.
1.3.1.3	The Filing Constituent Entity shall report the name of the UPE.
1.3.1.4	The Filing Constituent Entity shall report the TIN of the UPE used for purposes of Covered Taxes in the jurisdiction where the UPE is located for GloBE purposes or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.
1.3.1.5	The Filing Constituent Entity shall report the TIN (if any) issued to the UPE by the jurisdiction where filing takes place ("the Filing Jurisdiction").
1.3.1.6	The relevant option(s) shall be selected; • Constituent Entity • Flow-Through Entity – Tax Transparent • Flow-Through Entity – Reverse Hybrid • Hybrid Entity • Main Entity • Investment Entity • Insurance Investment Entity • Excluded Entity. If more than one option is relevant, the Filing Constituent Entity shall select all relevant options.
1.3.1.7	If the UPE is an Excluded Entity, the Filing Constituent Entity shall report whether the UPE is: • a Governmental Entity; • an International Organisation; • a Non-profit Organisation; • a Pension Fund; • an Investment Fund that is the UPE; • a Real Estate Investment Vehicle that is the UPE
1.3.1.8	The Filing Constituent Entity shall report the jurisdiction that requires the UPE to apply is QIIR under Art. 103 (4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
1.3.2 Group Entities (other than the UPE) and members of JV Groups	
1.3.2.1 Constituent Entities and members of JV Groups	
1.3.2.1	The information reported in the table shall be reported as of last day of the Reporting Fiscal Year.
1.3.2.1.1	The Filing Constituent Entity shall report "No" if the information reported in rows 1.3.2.1.2 to 1.3.2.1.16 of the GIR filed for the preceding Reporting Fiscal Year is still valid and complete for the Reporting Fiscal Year. • If the answer is No, the Filing Constituent Entity shall not complete rows 1.3.2.1.2 to 1.3.2.1.16. • If the answer is Yes, the Filing Constituent Entity shall complete all rows 1.3.2.1.2 to 1.3.2.1.16 with respect to all Constituent Entities and members of JV Groups.
1.3.2.1.2	The Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction where the Constituent Entity (other than the UPE), the JV or the JV Subsidiary is located for GloBE purposes. This row could include the UPE jurisdiction if Constituent Entities other than the UPE, JVs or JV Subsidiaries are located in the UPE jurisdiction. The Filing Constituent Entity shall insert "Stateless" for Stateless Constituent Entities.
1.3.2.1.3	The relevant rules applicable in the jurisdiction shall be selected: (i) QIIR applicable to Low-Taxed Constituent Entities located in other jurisdictions only; (ii) QIIR applicable to both Low-Taxed Constituent Entities located in other jurisdictions and in the jurisdiction of the Parent Entity; (iii) QUTPR; (iv) QDMTT If more than one option is relevant, the Filing Constituent Entity shall select all relevant options. If the rule applies to all Constituent Entities or members of JV Groups located in the jurisdiction, the Filing Constituent Entity shall complete this row only once (irrespective of the number of Constituent Entities or member of JV Groups in the jurisdiction).

Instructions	
1.3.2.1.4	The Filing Constituent Entity shall report the name of the Constituent Entity, JV or JV Subsidiary.
1.3.2.1.5	The Filing Constituent Entity shall report the TIN of the Constituent Entity, JV or JV Subsidiary used for purposes of Covered Taxes in the jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number. For the identification of Stateless Constituent Entities, the Filing Constituent Entity shall report the TIN or its functional equivalent used for purposes of Covered Taxes in the jurisdiction where the Entity was created.
1.3.2.1.6	The Filing Constituent Entity shall report the TIN of the relevant Constituent Entity, JV or JV Subsidiary issued (if any) by the jurisdiction where the filing of the GloBE Information Return takes place.
1.3.2.1.7	The relevant option(s) shall be selected: • Constituent Entity • Flow-Through Entity – Tax Transparent • Flow-Through Entity – Reverse Hybrid • Hybrid Entity • Permanent Establishment • Main Entity • Minority-Owned Parent Entity • Minority-Owned Subsidiary • Minority-Owned Constituent Entity • Investment Entity • Insurance Investment Entity • Securitisation Entity • Joint Venture (JV) • JV Subsidiary • Non-Material Constituent Entity. If more than one option is relevant, the Filing Constituent Entity shall select all relevant options. The Filing Constituent Entity shall complete table 1.3.2.1 separately with respect to Constituent Entity-owners (if any) for which the status of the Constituent Entity, Joint Venture or JV Subsidiary is different from the status reported in 1.3.2.1.7 (e.g. if a Flow-through Entity is treated as a Tax Transparent Entity by one of its Constituent Entity owners and a Reverse Hybrid Entity by the other, the Filing Constituent Entity shall complete table 1.3.2.1 twice for the same Flow-Through Entity: once with respect to the owner that treats the Flow-through Entity as a Tax Transparent Entity and another time with respect the owner that treats it as a Reverse Hybrid Entity).
1.3.2.1.8	The Filing Constituent Entity shall report the type of Entity that holds direct Ownership Interests in the Constituent Entity or member of a JV Group or indirect Ownership Interests in the Constituent Entity or member of a JV Group through Excluded Entities or non-Group members. The relevant option shall be selected (only one applicable): • UPE • Constituent Entities • Joint Ventures • JV Subsidiaries • Excluded Entities (aggregate) • Non-Group members (aggregate). "Excluded Entities (aggregate)" and "Non-Group members (aggregate)" are reported in the aggregate. Non-Group members are Entities that are not Group Entities or members of a JV Group.
1.3.2.1.9	The Filing Constituent Entity shall report the TIN (or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number) of the Constituent Entities, JVs or JV Subsidiaries that hold Ownership Interests in the Constituent Entity, JV or JV Subsidiary. No TIN shall be reported for Excluded Entities that are not the UPE and non-Group members as they are reported in the aggregate (i.e., "Excluded Entities (aggregate)" and "Non-Group members (aggregate)".
1.3.2.1.10	The Filing Constituent Entity shall report (in percentage) the Ownership Interests directly held in the Constituent Entity, JV or JV Subsidiary by the Constituent Entities, JV, JV subsidiaries, Excluded Entities and non-Group members identified in 1.3.2.1.8. The Filing Constituent Entity shall report Ownership Interests held by non-Group members in the aggregate. When several Excluded Entities hold direct Ownership Interest in a Constituent Entity, JV or JV Subsidiary, the aggregate amount held by all Excluded Entities shall be reported. When a Group Entity, Joint Venture or JV Subsidiary holds indirect Ownership Interest in a Constituent Entity, Joint Venture or JV subsidiary through one or more Excluded Entities or through non-Group members, the Filing Constituent Entity shall report, in addition to any Ownership Interest that this Group Entity, Joint Venture or JV Subsidiary holds directly, the Ownership Interests that it holds indirectly through Excluded Entities or non-Group members. To avoid double counting, in this case, the Ownership Interests directly held in the Constituent Entity, Joint Venture or JV subsidiary by such Excluded Entities or non-Group members taken into account in computing that Group Entity's Ownership Interest shall not be reported separately. If the Constituent Entity is a Permanent Establishment, the Filing Constituent Entity shall identify the Main Entity in 1.3.2.1.8 and report 100% in 1.3.2.1.10.
1.3.2.1.11 ~ 1.3.2.1.13	This information shall only be reported in respect of the CE if a QIIR applies in the jurisdiction where the CE is located and if the CE is a POPE or an Intermediate Parent Entity. This information shall not be reported in respect of members of JV Groups or Entities that do not own any Ownership Interest (direct or indirect) in another CE as those Group Entities are not potential Parent Entities.

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1.3.2.1.11	The Filing Constituent Entity shall report the type of Parent Entity that applies. The relevant option shall be selected (if any): • POPE • Intermediate Parent Entity • Parent Entity required to apply a QIIR under Art. 103 (4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. Pursuant to the definition of the Partially-Owned Parent Entity, the Parent Entity is a Partially-Owned Parent Entity if it has more than 20% of the Ownership Interests in its profits held (directly or indirectly) by persons that are not Constituent Entities of the MNE Group and if it owns (directly or indirectly) an Ownership Interest in another Constituent Entity of the same MNE Group.
1.3.2.1.12	The Filing Constituent Entity shall report the TIN used for Covered Taxes in the jurisdiction where the other Intermediate Parent Entity is located for GloBE purposes or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.
1.3.2.1.13	Pursuant to Art. 72 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT, a POPE is not required to apply the IIR if it is wholly owned (directly or indirectly) by another POPE that is required to apply a Qualified IIR for the Reporting Fiscal Year. If the exception in Art. 72 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall report the TIN used for Covered Taxes in the jurisdiction where the other Partially-Owned Parent Entity is located for GloBE purposes or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.
1.3.2.1.14 ~ 1.3.2.1.16	The Filing Constituent Entity shall not complete these rows in cases where no jurisdiction has taxing rights under the UTPR with respect to the jurisdiction where the Constituent Entity is located or where the UTPR Safe Harbour applies with respect to that jurisdiction.
1.3.2.1.14	If the answer is “Yes”, the Filing Constituent Entity shall not complete rows 1.3.2.1.15 and 1.3.2.1.16.
1.3.2.1.15	The Filing Constituent Entity shall report the aggregate Ownership Interests in percentage over the total of Ownership Interests held in that Constituent Entity. The aggregate (direct and indirect) Ownership Interests of Parent Entities required to apply a QIIR is the sum of the Ownership Interests held by each Parent Entity that is required to apply a QIIR with respect to the Low-Taxed Constituent Entities. The aggregate amount shall be zero if no Parent Entity is required to apply a QIIR in respect of the low taxed income of the Low-Taxed Constituent Entity. If a Parent Entity (that owns an Ownership Interest in a Low-Taxed Constituent Entity indirectly through an Intermediate Parent Entity or a Partially-Owned Parent Entity that is not eligible for an exclusion from the IIR under Art. 72 (4) through (5) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT) is required to apply the IIR, the relevant Ownership Interests shall be counted only once for purposes of computing the aggregate amount. The Filing Constituent Entity shall report the aggregate Allocable Share of Top-up Taxes of the member of the JV Group in percentage over the total amount of Top-up Tax for that member of a JV Group. The aggregate Allocable Share of Top-up Taxes of Parent Entities required to apply a QIIR is the sum of the Allocable Share of Top-up Taxes of each Parent Entity that is required to apply a QIIR with respect to the Low-Taxed Joint Venture or JV Subsidiary. The aggregate amount shall be zero if no Parent Entity is required to apply a QIIR in respect of the low-taxed income of the Joint Venture or JV Subsidiary. If a Parent Entity holds an Ownership Interest in a Low-Taxed Joint Venture or JV subsidiary indirectly through another other Parent Entity that is required to apply the IIR, the Allocable Share of Top-up Taxes shall be counted only once for purposes of computing the aggregate amount.
1.3.2.1.16	The Filing Constituent Entity shall report whether the UPE’s Ownership Interests in the CE are held directly or indirectly by Parent Entities required to apply a QIIR in that CE (or whether the aggregate Allocable Shares of Top-up Taxes of Parent Entities required to apply a QIIR for the member of JV Group reduces to zero the JV Group Top-up Tax).
1.3.2.1.15 and 1.3.2.16	The Filing Constituent Entity shall not complete these rows in cases where the UPE is required to apply a QIIR with respect to the relevant Constituent Entities (which could include Constituent Entities located in the UPE jurisdiction). In all other cases, the Filing Constituent Entity shall only complete these rows when a Parent Entity required to apply a QIIR with respect to a Constituent Entity holds an Ownership Interest lower than 100% in that Constituent Entity.

Instructions

1.3.2.2 Excluded Entities

1.3.2.2	The information reported in the table shall be reported for each Excluded Entity as of last day of the Reporting Fiscal Year. An Excluded Entity is a Group Entity that is defined in Art. 62 (3) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT.
1.3.2.2.1	The Filing Constituent Entity shall report "No" if the information reported in 1.3.2.1.3, 1.3.2.2.2 and 1.3.2.2.3 of the GIR filed for the preceding Reporting Fiscal Year is still valid and complete for the Reporting Fiscal Year. If the answer is No, The Filing Constituent Entity shall not complete 1.3.2.2.2 and 1.3.2.2.3. If the answer is Yes, The Filing Constituent Entity shall complete 1.3.2.2.2 and 1.3.2.2.3 with respect to all Excluded Entities.
1.3.2.2.2	The Filing Constituent Entity shall identify the name of each Excluded Entity.
1.3.2.2.3	The Filing Constituent Entity shall the type of each Excluded Entity. The relevant option shall be selected (only one applicable): • Governmental Entity • International Organisation • Non-profit Organisation • Pension Fund • Investment Fund that is an UPE • Real Estate Investment Vehicle that is an UPE • Entity owned by Excluded Entities under Art. 102 (1) 7 a of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT • Entity owned by Excluded Entities under Art. 102 (1) 7 b of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.

1.3.3 Changes in the corporate structure that occurred during the Reporting Fiscal Year

1.3.3.a	The Filing Constituent Entity shall report "Yes" if any changes occurred during the Reporting Fiscal Year were not reported in table 1.3.3 because they did not affect the ETR computation, the Top-up Tax computation or the allocation of Top-up Tax at any time during the Reporting Fiscal Year (e.g. where a Constituent Entity that was not involved in any cross-border allocation of income or taxes was directly and wholly-owned by the UPE prior to the change and it is transferred to another Constituent Entity that is directly and wholly-owned by the UPE).
1.3.3	The Filing Constituent Entity shall not complete the table Constituent Entity (or other Entity of the MNE Group) or member of a JV Group was subject to changes during the Reporting Fiscal Year. The Filing Constituent Entity shall complete these table only with respect to changes that at any time during the Reporting Fiscal Year affected the ETR computation (e.g., for Constituent Entities involved in the cross-border allocation of income or taxes) or the computation or allocation of Top-up Tax (e.g., the extent to which the IIR applies to a Constituent Entity).
1.3.3.1	The Filing Constituent Entity shall report all Constituent Entities (or other Entity of the MNE Group, e.g., Excluded Entities) or members of JV Groups that were subject to changes in their ownership structure or in their status during the Reporting Fiscal Year.
1.3.3.2	The Filing Constituent Entity shall report the TIN used for purposes of Covered Taxes in the jurisdiction where the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group is located for GloBE purposes or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.
1.3.3.3	The Filing Constituent Entity shall report the effective date (using dd-mm-yyyy format) of any changes in the ownership structure or any changes in the status of the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group. If a Constituent Entity (or other Entity of the MNE Group) or a member of a JV Group was subject to more than one change during the Reporting Fiscal Year, the Filing Constituent Entity shall complete a separate row for each of such changes.
1.3.3.4	The Filing Constituent Entity shall report the relevant status for GloBE purposes of the Constituent Entity (or other Entity of the MNE Group) or member of JV Group on the day immediately preceding the date of the change. The relevant option(s) shall be selected: • Constituent Entity • Flow- Through Entity – Tax Transparent • Flow-Through Entity – Reverse Hybrid • Hybrid Entity • Permanent Establishment • Main Entity • Minority-Owned Parent Entity • Minority-Owned Subsidiary • Minority-Owned Constituent Entity • Investment Entity • Insurance Investment Entity • Securitisation Entity • Joint Venture (JV) • JV Subsidiary • Non-Material Constituent Entity • POPE • Intermediate Parent Entity • Ultimate Parent Entity • Parent Entity required to apply a QIIR under Art. 103 (4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT • Excluded Entity • Non-Group member. If more than one option is relevant, the Filing Constituent Entity shall select all relevant options.

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1.3.3.5	The Filing Constituent Entity shall report the relevant status for GloBE purposes of the Constituent Entity (or other Entity of the MNE Group) or member of JV Group on the day of the change after the transaction. The relevant option(s) shall be selected: • Constituent Entity • Flow-Through Entity – Tax Transparent • Flow-Through Entity – Reverse Hybrid • Hybrid Entity • Permanent Establishment • Main Entity • Minority-Owned Parent Entity • Minority-Owned Subsidiary • Minority-Owned Constituent Entity • Investment Entity • Insurance Investment Entity • Securitisation Entity • Joint Venture (JV) • JV Subsidiary Non-Material Constituent Entity • POPE • Intermediate Parent Entity • Ultimate Parent Entity • Parent Entity required to apply a QIIR under Art. 103 (4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT • Excluded Entity • Non-Group member. If more than one option is relevant, the Filing Constituent Entity shall select all relevant options.
1.3.3.5 ~ 1.3.3.8	If a Constituent Entity (or other Entity of the MNE Group) or member of a JV Group is wound up during the Reporting Fiscal Year, the Filing Constituent Entity shall report the relevant status for GloBE purposes on the day of the change before the transaction in 1.3.3.4 and "Non-group Member" in 1.3.3.5. The Filing Constituent Entity shall then identify the Entities holding Ownership Interests in the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group on the day of the change before the transaction in 1.3.3.6 and report the Ownership Interests held in the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group by any of such Entities in 1.3.3.7. The Filing Constituent Entity, however, shall not complete 1.3.3.8.
1.3.3.6 ~ 8	The Filing Constituent Entity shall not complete the 1.3.3.6 and 1.3.3.7 columns with respect to Excluded Entities that were Excluded Entities before the change. The Filing Constituent Entity shall not complete the 1.3.3.6 and 1.3.3.8 columns with respect to Excluded Entities that were Excluded Entities after the change.
1.3.3.6	If the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group is a Permanent Establishment, the Filing Constituent Entity shall identify its Main Entity in the 1.3.3.6 column and report 100% in the 1.3.3.7 or 1.3.3.8 column. The Filing Constituent Entity shall report all Constituent Entities, Group Entities, Excluded Entities, members of JV Groups or non-Group members that directly held Ownership Interests in the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group on the day immediately preceding the date of the transaction or on the day of the change after the transaction. Excluded Entities that are not the UPE and non-Group members should be reported in the aggregate (i.e., "Excluded Entities (aggregate)" and "Non-Group members (aggregate)"). The Filing Constituent Entity shall also report any Group Entity that indirectly held Ownership Interests in the Constituent (or other Entity of the MNE Group) through Excluded Entities or non-Group members on the day immediately preceding the date of the transaction or on the day of the change after the transaction.
1.3.3.7	The Filing Constituent Entity shall report (in percentage) the Ownership Interests held in the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group by the Constituent Entities, Excluded Entities, members of JV Groups and non-Group members identified in 1.3.3.6 on the day immediately preceding the date of change in accordance with the instruction provided in Note 1.3.2.1.10.
1.3.3.8	The Filing Constituent Entity shall report (in percentage) the Ownership Interests held in the Constituent Entity (or other Entity of the MNE Group) or member of a JV Group by the Constituent Entities, Excluded Entities, members of JV Groups and non-Group members identified in 1.3.3.6 on the day of the change after the transaction in accordance with the instruction provided in Note 1.3.2.1.10.
1.4 High-level summary of GloBE Information	
1.4	The Filing Constituent Entity shall not complete columns 1.4.2 to 1.4.9 in cases where no jurisdiction has taxing rights (i.e., column 1.4.4 would be empty) with respect to the jurisdiction identified in 1.4.1
1.4.1	The Filing Constituent Entity shall report the information reflected in the summary table in respect of each jurisdiction where the MNE Group has Constituent Entities or where members of JV Groups are located and each subgroup for which a separate ETR or Top-up Tax computation applies. The Filing Constituent Entity shall report the 2-character alphabetic country code for the jurisdiction where the MNE Group has Constituent Entities or where members of JV Groups are located based on the ISO 3166-1 Alpha 2 standard.
1.4.2	If applicable, the Filing Constituent Entity shall identify each subgroup, as reported in 2.1.2 and/or 3.1.2.
1.4.3	The Filing Constituent Entity shall report the TIN of the entity at the top of the ownership structure of each subgroup identified in 1.4.2.

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1.4.4	The Filing Constituent Entity shall report the names of the jurisdiction(s) with taxing rights in respect of the jurisdiction identified in 1.4.1 and, if applicable, the relevant subgroup identified in 1.4.3 in the form of 2-character alphabetic country codes based on the ISO 3166-1 Alpha 2 standard. A jurisdiction with taxing rights may include a jurisdiction requiring a Parent Entity to apply a QIIR under Art. 103 (4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, even if that Parent Entity is located in another jurisdiction for GloBE purposes. A jurisdiction has taxing rights in respect of another, where, under the rule order provided in the GloBE rules, the Jurisdictional Top-up Tax computed in respect of the latter jurisdiction would result in a Top-up Tax liability due by a Constituent Entity located in the former jurisdiction under the charging provisions in the former jurisdiction. Specifically, a QDMTT Safe Harbour jurisdiction or a jurisdiction with an Income Inclusion Rule that applies to domestic entities will have taxing rights in respect of itself. Further, several jurisdictions may have taxing rights in respect of the same other jurisdiction. This may be the case, for instance, when both the UPE and a Partially-Owned Parent Entity are required to apply the IIR in respect of a Constituent Entity located in a third jurisdiction. In that case, both the UPE jurisdiction and the Partially-Owned Parent Entity jurisdiction need to be reported under 1.4.4. Equally, UTPR jurisdictions would have taxing rights in respect of the jurisdictions for which the Top-up Tax is not reduced to zero under Art 72 (8) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT.
1.4.5	The Filing Constituent Entity shall report whether the Top-up Tax has been reduced to zero in respect of the jurisdiction identified in 1.4.1 or relevant subgroup identified in 1.4.3 (if any) because of the application of either a Safe Harbour or the de minimis exclusion as reported in 2.2.1 and 2.2.2 respectively. The Filing Constituent Entity shall report the relevant option applied for purposes of the Safe Harbour in accordance with Note 2.2.1.1.1.
1.4.6	The Filing Constituent Entity shall report the range in which the ETR of the jurisdiction identified in 1.4.1 or relevant subgroup identified in 1.4.3 (if any) and as reported in 3.2.1.e falls. The options are: (a) below 2.5% (b) 2.5% or above but below 5% (c) 5% or above but below 7.5% (d) 7.5% or above but below 10% (e) 10% or above but below 12.5% (f) 12.5% or above but below 15% (g) 15% or above but below 17.5% (h) 17.5% or above but below 20% (i) 20% or above but below 22.5% (j) 22.5% or above but below 25% (k) 25% or above but below 27.5% (l) 27.5% or above but below 30% (m) 30% or above The Filing Constituent Entity shall not complete this column if the MNE Group (or the relevant subgroup) has a GloBE Loss in the jurisdiction. Furthermore, the Filing Constituent Entity shall not complete this column for those jurisdictions (or subgroups) in respect of which Section 3 of the GIR does not need to be completed.
1.4.7	The Filing Constituent Entity shall report whether the application of the Substance-based Income Exclusion in respect of the jurisdiction identified in 1.4.1 or relevant subgroup identified in 1.4.3, if any, has resulted in no Top-Up Tax arising in the jurisdiction. Where there is no SBIE calculated for the jurisdiction or the subgroup the Filing Constituent Entity shall indicate “n/a”.
1.4.8	The Filing Constituent Entity shall report the range in which the QDMTT Top-up Tax payable falls, in respect of the jurisdiction identified in 1.4.1 or relevant subgroup identified in 1.4.3 (if any), as reported in 3.3.1.e, if any. The options are: (a) no Top-up Tax payable (b) below EUR 1 million (c) EUR 1 million to below EUR 5 million (d) EUR 5 million to below EUR 25 million (e) EUR 25 million to below EUR 50 million (f) EUR 50 million to below EUR 75 million (g) EUR 75 million to below EUR 100 million (h) EUR 100 million to below EUR 250 million (i) EUR 250 million or above

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1.4.9	The Filing Constituent Entity shall report the range in which the GloBE Top-up Tax payable, if any, falls, in respect of the jurisdiction identified in 1.4.1 or relevant subgroup identified in 1.4.3 (if any) and as reported in 3.3.1.f. The options are: ⓐ no Top-up Tax payable ⓑ below EUR 1 million ⓒ EUR 1 million to below EUR 5 million ⓓ EUR 5 million to below EUR 25 million ⓔ EUR 25 million to below EUR 50 million ⓕ EUR 50 million to below EUR 75 million ⓖ EUR 75 million to below EUR 100 million ⓗ EUR 100 million to below EUR 250 million ⓘ EUR 250 million or above If a different amount to the amount reported in 3.3.1.f is reported in 3.1.10, the Filing Constituent Entity shall report both the range in which the GloBE Top-up Tax payable falls as reported in 3.3.1.f and the range in which the average amount of Top-up Tax payable under the domestic legislation of each jurisdiction with taxing rights, if any, falls, in respect of the jurisdiction identified in 1.4.1 or the relevant subgroup identified in 1.4.3 (if any) and as reported in 3.1.10 with the same options. For purpose of the average, the amounts reported in 3.1.10 are weighted by the relevant jurisdiction's Allocable Share of the Top-up Tax (after deducting any reduction for the offset mechanism in Art. 72 (8) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT) or UTPR percentage as computed under the GloBE Model Rules and Commentary.(Art. 73 (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT)

Instructions

2. Jurisdictional Safe Harbours and Exclusion

2.1 Characteristics of the jurisdiction

2.1.	The Filing Constituent Entity shall report the information in respect of each jurisdiction where the MNE Group has Constituent Entities or where members of JV Groups are located.
2.1.1	The Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction. The Filing Constituent Entity shall report "Stateless" for each Stateless Constituent Entity.
2.1.2	Several subgroups can be identified in this row. The relevant option(s) shall be selected from the following list: • Constituent Entities • Minority-Owned Subgroup (specify which Minority-Owned Subgroup) • Standalone MOCEs • Investment Entities • Joint Venture Group (specify which JV Group) • Stateless Constituent Entity • Transitional CbCR Safe Harbour-Constituent Entities • Transitional CbCR Safe Harbour- Joint Venture Group (specify which JV Group) • Transitional UTPR Safe Harbour. Standalone MOCEs are Minority-Owned Constituent Entities that are not part of any Minority-Owned Group. Investment Entities also include JVs or JV subsidiaries that qualify as Investment Entities but do not include Investment Entities for which an election is made under Art. 79 (5) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT. Minority-Owned Subgroups may be made of members of JV Groups. Stateless Constituent Entities also include members of JV Groups that are Stateless. The Filing Constituent Entity shall report the relevant information for each subgroup.
2.1.3	The Filing Constituent Entity shall report the TIN of the entity at the top of the ownership structure of each subgroup identified in row 2.1.3.
2.1.4	The Filing Constituent Entity shall report the names of the jurisdiction(s) with taxing rights in respect of the jurisdiction identified in 2.1.1 and, if applicable, the relevant subgroup identified in 2.1.3 in the form of 2-character alphabetic country codes based on the ISO 3166-1 Alpha 2 standard. A jurisdiction has taxing rights in respect of another, where, under the rule order provided in the GloBE Rules, the Jurisdictional Top-up Tax computed in respect of the latter jurisdiction would result in a Top-up Tax liability due by a Constituent Entity located in the former jurisdiction under the charging provisions in the former jurisdiction. Specifically, a QDMTT Safe Harbour jurisdiction or a jurisdiction with an Income Inclusion Rule that applies to domestic Entities will have taxing rights in respect of itself. Further, several jurisdictions may have taxing rights in respect of the same other jurisdiction. This may be the case, for instance, when both the UPE and a Partially-Owned Parent Entity are required to apply the IIR in respect of a Constituent Entity located in a third jurisdiction. In that case, both the UPE jurisdiction and the Partially-Owned Parent Entity jurisdiction need to be reported under 2.1.4. Equally, UTPR jurisdictions would all have taxing rights in respect of the jurisdictions for which the Top-up Tax is not reduced to zero under Art. 73 (3) 1 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT. When multiple jurisdictions are reported in 2.1.4, the Filing Constituent Entity shall also complete 2.1.5 in respect of each of them.
2.1.5	This row shall be completed separately for each jurisdiction with taxing rights identified in 2.1.4. The Filing Constituent Entity shall report 'Yes' for a jurisdiction when either the MNE Group has reported that it is eligible for a safe harbour or exclusion in Section 2 when it is not eligible for the same safe harbour or exclusion under the domestic law of the relevant jurisdiction with taxing rights or, conversely, the MNE Group has reported that it is not eligible for a safe harbour or exclusion in Section 2 when it is eligible for the same safe harbour or exclusion under the domestic law of the relevant jurisdiction with taxing rights. Where the Filing Constituent Entity reports 'Yes', it should both: (i) complete Section 2 with respect to the relevant safe harbour or exclusion; and (ii) report in Section 3 the jurisdictional computations for that jurisdiction or subgroup.

2.2 Jurisdictional exceptions applicable in respect of this jurisdiction (Top-up Tax reduced to zero)

2.2.1 Safe harbour jurisdiction election

2.2.1	Where a safe harbour reduces the top-up tax to zero for Constituent Entities or members of JV Groups, the Filing Constituent Entity shall not complete any tables in Section 3 with respect to those Constituent Entities or members of JV Groups (except otherwise indicated in the notes below).

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2.2.1.1 Safe harbour election

2.2.1.1.1 The Filing Constituent Entity shall identify the test that it elects to apply for this jurisdiction. An MNE Group that qualifies for more than one test may choose which test to apply for that jurisdiction. The Filing Constituent Entity shall select the relevant option:

(a) permanent safe harbour – De minimis test;

(b) permanent safe harbour – ETR test;

(c) permanent safe harbour – routine profits test;

(d) QDMTT safe harbour;

(e) Transitional CbCR Safe Harbour – De minimis test;

(f) Transitional CbCR Safe Harbour – Simplified ETR test;

(g) Transitional CbCR Safe Harbour – Routine profits test; or

(h) Transitional UTPR safe harbour.

The Filing Constituent Entity shall not select option (e), (f) or (g) for a jurisdiction for a Reporting Fiscal Year if it did not elect to apply a safe harbour or selected an option other than (e), (f) or (g) for the preceding Reporting Fiscal Year. Option (h) can only be selected if the jurisdiction is the UPE jurisdiction, in accordance with the agreed safe harbour.

2.2.1.1.1 If option (a), (b) or (c) is selected, and Simplified Calculations only apply to a portion of the GloBE calculations, the Filing Constituent Entity shall also complete relevant portions of Section 3 that are not covered by the Simplified Calculations.

2.2.1.1.1 If option (a), (b) or (c) is selected, and only a portion of Constituent Entities or members of JV Groups in the subgroup identified in 2.1.3 are covered by the Simplified Calculations, the Filing Constituent Entity shall also complete Section 3 for all Constituent Entities or members of JV Groups located in the safe harbour jurisdiction as provided in the explanatory instructions.

2.2.1.1.1 If option (a), (b) or (c) is selected, and Additional Current Top-up Tax arises in the jurisdiction, the Filing Constituent Entity shall also complete columns 1.4.8 to 1.4.9, columns 3.3.1.d to 3.3.1.f, Section 3.3.3 and Section 3.4 with respect to the relevant Constituent Entities or members of JV Groups located in the jurisdiction.

2.2.1.1.1 Option (d) shall not be selected when the switch-off rule applies to the QDMTT Safe Harbour in respect of the jurisdiction or the relevant subgroup. If option (d) is selected, the Filing Constituent Entity may also select one of the other options. If no other option is selected, the Filing Constituent Entity shall also complete Section 3 for all Constituent Entities or members of JV Groups located in the safe harbour jurisdiction with the calculations undertaken for QDMTT purposes (or for the Stateless Constituent Entities if the QDMTT is imposed on the Stateless Constituent Entities in the safe harbour jurisdiction). If the MNE Group elects to apply the QDMTT safe harbour together with another safe harbour (or the de-minimis exclusion, respectively) available under the QDMTT legislation, the Filing Constituent Entity shall complete the relevant portions of Section 3 (or Table 2.2.2, respectively) with the calculations undertaken for QDMTT purposes. As an exception, however, the Filing Constituent Entity shall not complete Section 3.4 unless the QDMTT legislation allocates the QDMTT among Constituent Entities (or members of JV Groups) based on their GloBE Income. If the QDMTT legislation allocates the QDMTT among Constituent Entities (or members of JV Groups) based on their GloBE Income, the Filing Constituent Entity shall complete rows 3.4.1.1.a to 3.4.1.1.c.

2.2.1.1.1 If option (c) or (g) is selected, the Filing Constituent Entity shall also complete Section 3.3.2 (relating to the Substance-based Income Exclusion) with respect to the relevant Constituent Entities or members of JV Groups in accordance with agreed safe harbours. Nevertheless, the Filing Constituent Entity does not need to complete Section 3.3.2 if option (g) is selected and the MNE Group reported zero profit or a loss for the jurisdiction in 2.2.1.3.(a).2.

Instructions	
2.2.1.2 Permanent safe harbours	
(a) Simplified Calculation for Non-material Constituent Entities	
2.2.1.2.(a).1.a~d	If Simplified Calculation for Non-material Constituent Entities is utilised under option (a), (b) or (c) in 2.2.1.1.1, the Filing Constituent Entity shall also report the Total Revenue, as defined in the Safe Harbours and Penalty Relief document, of all Non-material Constituent Entities located in the jurisdiction for which the election to apply the Simplified Calculations for Non-Material Constituent Entities is made for the Reporting Fiscal Year, the first preceding fiscal year (if applicable) and the second preceding fiscal year (if applicable), as well as the average of the three Fiscal Years respectively. If Simplified Calculation for Non-material Constituent Entities is utilised under option (a) in 2.2.1.1 and the Simplified Calculations for Non-Material Constituent Entities apply only to some of the Constituent Entities in the subgroup identified in 2.1.3, the Filing Constituent Entity shall also complete table 2.2.2.
2.2.1.2.(a).2	If Simplified Calculation for Non-material Constituent Entities is utilised under option (b) in 2.2.1.1.1, the Filing Constituent Entity shall report aggregate Simplified Tax, as defined in the Safe Harbours and Penalty Relief document, of all Non-material Constituent Entities located in the jurisdiction for which the election to apply the Simplified Calculations for Non-Material Constituent Entities is made for the Reporting Fiscal Year.
2.2.1.3 Transitional safe harbours	
(a) Transitional CbCR Safe Harbour	
2.2.1.3.(a)	Where the Qualified Financial Statements used to complete this table are the separate financial statements of a Constituent Entity or a member of a JV Group and are based on an accounting standard that differs from the accounting standard used in the Consolidated Financial Statements of the Ultimate Parent Entity, the Filing Constituent Entity shall complete Table 3.2.4.6.
2.2.1.3.(a).1	If option (e) is selected in 2.2.1.1.1, the Filing Constituent Entity shall report the Total Revenue for the jurisdiction as reported in the Qualified CbC Report of the MNE Group (or Qualified Financial Statements for members of JV Groups) for the Reporting Fiscal Year. Option (e) cannot be selected if the sum of the total revenue of entities that are held for sale when combined with the CbCR Total Revenue in that jurisdiction (as reported in the MNE's Qualified CbC Report) equals or exceeds EUR 10 million.
2.2.1.3.(a).2	If option (e), (f) or (g) is selected in 2.2.1.1.1, the Filing Constituent Entity shall report the Profit (Loss) before Income Tax for the jurisdiction as reported in the Qualified CbC Report of the MNE Group (or Qualified Financial Statements for members of JV Groups) for the Reporting Fiscal Year and in accordance with the methodologies set out in the Safe Harbours and Penalty Relief document.
2.2.1.3.(a).3	If option (f) is selected in 2.2.1.1.1, the Filing Constituent Entity shall report the Simplified Covered Taxes of the relevant Constituent Entities or members of JV Groups, as defined in the Art. 86 (6) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, for the Reporting Fiscal Year.
(b) Transitional UTPR Safe Harbour	
2.2.1.3.(b).1	If option (h) is selected in 2.2.1.1.1, the Filing Constituent Entity shall report the corporate income tax rate of the UPE jurisdiction in accordance with the agreed safe harbour.
2.2.2 Election for de minimis exclusion	
2.2.2	Investment Entities and Stateless Constituent Entities are not eligible for the de minimis exclusion. The GloBE Revenue and GloBE Income or Loss of both types of entities are excluded from the computation in Art. 74 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT. The GloBE Revenue and the GloBE Income or Loss of the Minority-Owned Constituent Entities is taken into account together with those of other Constituent Entities for purposes of determining the Average GloBE Revenue and the Average GloBE Income or Loss of the jurisdiction where they are located. Where the Filing Constituent Entity elects to apply the de minimis exclusion with respect to an eligible jurisdiction, the Filing Constituent Entity shall complete Section 3.2.4.6 (where applicable) for the jurisdiction. If Additional Current Top-up Tax arises in the jurisdiction, the Filing Constituent Entity shall also complete columns 1.4.8 to 1.4.9, columns 3.3.1.d to 3.3.1.f, Section 3.3.3 and Section 3.4 for the jurisdiction. The Filing Constituent Entity shall select whether this table is completed for purpose of the application of the de minimis exclusion or to provide computations with respect to Constituent Entities that are not Non-material Constituent Entities if Simplified Calculation for Non-material Constituent Entities is utilised under option (a) in 2.2.1.1 and the Simplified Calculations for Non-Material Constituent Entities apply only to a portion of the Constituent Entities in the subgroup identified in 2.1.3.

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2.2.2.1	The Filing Constituent Entity shall report here the sum of the revenue of Constituent Entities or members of JV Groups located in the jurisdiction before any adjustments under Chapter 3.
2.2.2.2	The Filing Constituent Entity shall report here the sum of the GloBE Revenue of Constituent Entities or members of JV Groups located in the jurisdiction.
2.2.2.3	The Filing Constituent Entity shall report here the aggregate FANIL of Constituent Entities or members of JV Groups located in the jurisdiction.
2.2.2.4	The Filing Constituent Entity shall report here the sum of the GloBE Income or Loss of Constituent Entities or members of JV Groups located in the jurisdiction.
2.2.2.a ~ c	The Filing Constituent Entity shall report the relevant amounts in respect of the Reporting Fiscal Year, the first preceding fiscal year (if applicable) and the second preceding fiscal year (if applicable), respectively.
2.2.2.d	Where appropriate, the Average of the three Fiscal Years shall be computed by adjusting the corresponding revenue and income (or loss) calculations in proportion to the period covered by the preceding Fiscal Year over a calendar year.
2.3 MNE Group in the initial phase of international activity (if applicable)	
2.3	When Art. 82 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, and no Group Entity is required to apply a QIIR, the Filing Constituent Entity does not need to complete Sections 2.1, 2.2 or Section 3 for the relevant jurisdictions for which the Top-up Tax is reduced to zero.
2.3.1	Art. 82 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT does not apply for any Fiscal Year that starts later than five years after the first day of the Fiscal Year reported in 2.3.1. For MNE Groups in scope of the GloBE Rules when they come into effect, the date reported in 2.3.1 shall be replaced with the date when the UTPR rules come into effect.
2.3.2	The Reference Jurisdiction is defined in Art. 140 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
2.3.3	The Filing Constituent Entity shall report the Net Book Values of Tangible Assets of all Constituent Entities located in the jurisdiction for the Fiscal Year in which the MNE Group originally comes within the scope of the GloBE Rules.
2.3.4	The location of Joint Ventures and JV Subsidiaries or Investment Entities that are not Excluded Entities is not taken into account to determine the number of jurisdictions where the MNE Group has Constituent Entities.
2.3.5.a	The Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard of each jurisdiction, other than the Reference Jurisdiction, where Constituent Entities are located for the Fiscal Year in which the MNE Group originally comes within the scope of the GloBE Rules. The number of jurisdictions other than the Reference Jurisdiction shall be up to five.
2.3.5.b	The Filing Constituent Entity shall report, for each jurisdiction, the Net Book Values of Tangible Assets of all Constituent Entities located in each of jurisdiction other than the Reference Jurisdiction for the Fiscal Year in which the MNE Group originally comes within the scope of GloBE Rules. Tangible Assets of Stateless Constituent Entities are considered held by Constituent Entities located in a jurisdiction other than the Reference Jurisdiction, except to the extent that the MNE Group demonstrates that those Tangible Assets are physically located in the Reference Jurisdiction. Tangible Assets of Joint Ventures and JV Subsidiaries or Investment Entities that are not Excluded Entities, are not taken into account to determine the Sum of the Net Book Values of Tangible Assets of all Constituent Entities located in other jurisdictions than the Reference Jurisdiction.
2.3.6	The Filing Constituent Entity shall report the Number of jurisdictions where the MNE Group has Constituent Entities during the Reporting Fiscal Year. If the Reporting Fiscal Year is the Fiscal Year in which the MNE Group originally comes within the scope of GloBE Rules, this information shall not be reported as it can be derived from the information reported under 2.3.4.
2.3.7	The Filing Constituent Entity shall report the sum of the Net Book Values of Tangible Assets of all Constituent Entities located in all jurisdictions other than the Reference Jurisdiction during the Reporting Fiscal Year. If the Reporting Fiscal Year is the Fiscal Year in which the MNE Group originally comes within the scope of GloBE Rules, this information shall not be reported as it can be derived from the information reported under 2.3.5.

Instructions	
3. GloBE Computations	
3.1 Characteristics of the Jurisdiction	
3.1	The Filing Constituent Entity shall report the information in respect of each jurisdiction where the MNE Group has Constituent Entities or where members of JV Groups are located.
3.1.1	The Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction. The Filing Constituent Entity shall report "Stateless" for each Stateless Constituent Entity.
3.1.2	A "subgroup'' shall be identified for each perimeter of GloBE computation. Several subgroups can be identified in this row. The relevant option(s) shall be selected: • Constituent Entities • Minority-Owned Subgroup (specify which Minority-Owned Subgroup) • Standalone MOCEs • Investment Entities • Joint Venture Group (specify which JV Group) • Stateless Constituent Entity. Standalone MOCEs are Minority- Owned Constituent Entities that are not part of any Minority-Owned Group. Investment Entities also include JVs or JV subsidiaries that qualify as Investment Entities but do not include Investment Entities for which an election is made under Art. 79 (5) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT. Minority-Owned Subgroups may be made of members of JV Groups. Stateless Constituent Entities also include members of JV Groups that are Stateless. The Filing Constituent Entity shall report the relevant information in Sections 3.2 for each subgroup.
3.1.3	The Filing Constituent Entity shall report the TIN of the entity at the top of the ownership structure of each subgroup identified in row 3.1.2.
3.1.4	The Filing Constituent Entity shall report the names of the jurisdiction(s) with taxing rights in respect of the jurisdiction identified in 3.1.1 and, if applicable, the relevant subgroup identified in 3.1.2 in the form of 2-character alphabetic country codes based on the ISO 3166-1 Alpha 2 standard. A jurisdiction has taxing rights in respect of another, where, under the rule order provided in the GloBE rules, the Jurisdictional Top-up Tax computed in respect of the latter jurisdiction would result in a Top-up Tax liability due by a Constituent Entity located in the former jurisdiction under the charging provisions in the former jurisdiction. Specifically, a QDMTT Safe Harbour jurisdiction or a jurisdiction with an Income Inclusion Rule that applies to domestic entities will have taxing rights in respect of itself. Further, several jurisdictions may have taxing rights in respect of the same other jurisdiction. This may be the case, for instance, when both the UPE and a Partially-Owned Parent Entity are required to apply the IIR in respect of a Constituent Entity located in a third jurisdiction. In that case, both the UPE jurisdiction and the Partially-Owned Parent Entity jurisdiction need to be reported under 3.1.4. Equally, UTPR jurisdictions would all have taxing rights in respect of the jurisdictions for which the Top-up Tax is not reduced to zero under Art. 73 (3) 1 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.1.5 ~ 3.1.10	These data points do not need to be reported if only a single jurisdiction is reported as having taxing rights in 3.1.4 or if the QDMTT Safe Harbour applies with respect to the jurisdiction (in 3.1.1) or subgroup (in 3.1.3). Each data point should be reported separately for each jurisdiction with taxing rights identified under 3.1.4 ("the relevant jurisdiction with taxing rights"). If there is no difference, the Filing Constituent Entity shall report "No difference".
3.1.5	The Filing Constituent Entity shall report the Effective Tax Rate for a jurisdiction identified in 3.1.1 or a subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this Effective Tax Rate is different to the Effective Tax Rate reported in 3.2.1.e.
3.1.6	This data point should only be reported if a different Effective Tax Rate is reported in 3.1.5 for a jurisdiction identified in 3.1.1 or a subgroup identified in 3.1.3. The Filing Constituent Entity shall report the aggregate Adjusted Covered Taxes calculated for that jurisdiction or subgroup on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this amount is different to the amount reported in 3.2.1.d.
3.1.7	This data point should only be reported if a different Effective Tax Rate is reported in 3.1.5 for a jurisdiction identified in 3.1.1 or a subgroup identified in 3.1.3. The Filing Constituent Entity shall report the Net GloBE Income calculated for that jurisdiction or subgroup on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this amount is different to the amount reported in 3.2.1.b.
3.1.8	This data point should only be reported if a different Top-up Tax payable is reported in 3.1.10 for a jurisdiction identified in 3.1.1 or a subgroup identified in 3.1.3. The Filing Constituent Entity shall report the Substance-based Income Exclusion for that jurisdiction or subgroup on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this amount is different to the amount reported in 3.3.1.b.
3.1.9	The Filing Constituent Entity shall report the Additional Current Top-up Tax Amount for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this amount is different to the amount reported in 3.3.1.d.

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3.1.10	The Filing Constituent Entity shall report the Top-up Tax payable for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this amount is different to the amount reported in 3.3.1.f.
3.1.11	The Filing Constituent Entity shall report whether there is a difference in the applicability of the elections reported under 3.2.3 for a jurisdiction identified in 3.1.1 or a subgroup identified in 3.1.3 and those elections under the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4.
3.1.12 ~ 3.1.15	These data points should be reported separately for each jurisdiction with taxing rights identified under 3.1.4 ("the relevant jurisdiction with taxing rights"). The questions should only be answered if a difference has been reported in 3.1.6. If there is no difference for a given question, the Filing Constituent Entity shall report "No difference".
3.1.12	The Filing Constituent Entity shall report the Aggregate current tax expense with respect to Covered Taxes after allocations in Art. 111 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT (see 3.2.1.2.(a).1) for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4.
3.1.13	The Filing Constituent Entity shall report the adjustment made under Art. 110 1 c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT in relation to Qualified Refundable Tax Credits or Marketable Transferable Tax Credits in the computation of Adjusted Covered Taxes (see 3.2.1.2.(a).2.d) for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4.
3.1.14	The Filing Constituent Entity shall report the adjustment made in the computation of Adjusted Covered Taxes under Art. 110 2 b. and c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT in relation to Non-Qualified Refundable Tax Credits or Non-Marketable Transferable Tax Credits or Other Tax Credits not recorded as a reduction to current tax expense (see 3.2.1.2.(a).2.(g)) for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4.
3.1.15	The Filing Constituent Entity shall report the Deferred tax expense amount (see 3.2.2.1.(a).1) for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4
3.1.16 ~ 3.1.18	These data points should be reported separately for each jurisdiction with taxing rights identified under 3.1.4 ("the relevant jurisdiction with taxing rights"). The Filing Constituent Entity shall report "No difference" if there is no difference.
3.1.16	This data point should only be reported if a difference has been reported in 3.1.7. The Filing Constituent Entity shall report the adjustment made under Form⑫ and ⑬ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT in relation to Qualified Refundable Tax Credits or Marketable Transferable Tax Credits in the computation of GloBE Income or Loss (see 3.2.1.1.2.(n)) for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.5.
3.1.17	The Filing Constituent Entity shall report the Excess Negative Tax Carry-forward Balance remaining for subsequent years for the jurisdiction identified in 3.1.1 or the subgroup identified in 3.1.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if this amount is different to the amount reported in 3.2.1.2.(b).4.
3.1.18	The information should only be reported if the Reporting Fiscal Year is the Transition Year for the jurisdiction identified in 3.1.1 or subgroup identified in 3.1.3. The Filing Constituent Entity shall complete 3.2.2.3 on the basis of the domestic legislation of the relevant jurisdiction with taxing rights identified in 3.1.4 if there is a difference between this information and the information reported in 3.2.2.3.
3.2 ETR computation	
3.2.1 ETR	
3.2.1.a	The Filing Constituent Entity shall report the aggregate amount of Financial Accounting Net Income or Loss determined for all Constituent Entities (or members of JV Group) located in the jurisdiction in preparing the Consolidated Financial Statements of the UPE.
3.2.1.b	The Filing Constituent Entity shall report the Net GloBE Income or Loss for the jurisdiction. If there is more than one Investment Entity located in the jurisdiction, the Filing Constituent Entity shall report sum of the MNE Group's Allocable Shares of each Investment Entity's GloBE Income or Loss as determined under Art. 79 (1) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 135 (2) 2 and 3 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.1.c	The Filing Constituent Entity shall report the aggregate amount of income tax expense that is recorded in the financial accounts of Constituent Entities (or members of JV Group) located in the jurisdiction.
3.2.1.d	The Filing Constituent Entity shall report the aggregate amount of Adjusted Covered Taxes of all Constituent Entities (or members of JV Groups) located in the jurisdiction. If there is more than one Investment Entity located in the jurisdiction, the Filing Constituent Entity shall report the sum of the Adjusted Covered Taxes of each Investment Entity as determined under Art. 79 (1) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 135 (2) 1 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.1.e	The Filing Constituent Entity shall report the Effective Tax Rate for the jurisdiction. The Filing Constituent Entity shall not complete this column if the MNE Group (or the relevant subgroup) has a GloBE Loss in the jurisdiction.

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3.2.1.1 Computation of GloBE Income (Loss)

3.2.1.1.1	The Filing Constituent Entity shall report the aggregate FANIL of Constituent Entities or members of JV Groups located in the jurisdiction after the allocation of GloBE Income or Loss between Main Entities and Permanent Establishments under Art. 66 (4) and (7) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and the allocation of GloBE Income or Loss from Flow-through Entities. Art. 79 (5) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT also covers the allocation of GloBE Income or Loss from an Investment Entity or an Insurance Investment Entity that is treated as a Tax Transparent Entity as a result of the election.
3.2.1.1.2.(b)	The Filing Constituent Entity shall report the adjustments related to Excluded Dividends. Where a movement in an insurance company's reserve economically matches an Excluded Dividend (net of the investment management fee) from a security held on behalf of a policyholder, the movement in the insurance reserves shall be reported as a positive adjustment (addition to the FANIL) in row 3.2.1.1.2.(b).
3.2.1.1.2.(c)	The Filing Constituent Entity shall report the adjustments related to Excluded Equity Gain or Loss. The amount of those adjustments shall also include foreign exchange gains or losses attributable to hedging instruments when the election to treat those foreign exchange gains or losses as an Excluded Equity Gain or Loss has been made. The expense from movements in insurance reserves related to Excluded Equity Gains or Losses from securities held on behalf of policyholders shall be reported as a positive adjustment (addition to the FANIL) in row 3.2.1.1.2.(c). The amount of the adjustments shall not include equity gain or loss that are not excluded pursuant to an Equity Investment Inclusion Election.
3.2.1.1.2.(k)	The Filing Constituent Entity shall report the reductions made to the Financial Accounting Net Income or Loss of the Constituent Entities where the Entities are subject to a debt release and the income is excluded from the GloBE Income pursuant to Form⑪ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.1.1.2.(n)	The Filing Constituent Entity shall report the adjustments made to the Financial Accounting Net Income or Loss pursuant to form⑫ and form⑬ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. In particular, any amount that is recorded as a reduction in current income tax expense (or other Covered Taxes) in the financial accounts and that should be treated as income, is included as a positive adjustment and any amount that is recorded as income in the financial accounts and that should be treated as a reduction in current income tax expense (or other Covered Taxes), is included as a negative adjustment.
3.2.1.1.2.(z)	The Filing Constituent Entity shall report the adjustments made to the Financial Accounting Net Income or Loss of the Constituent Entities where the entities are subject to an adjustment under Art. 89 2 and Art. 89 4 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.1.1.3	The Filing Constituent Entity shall report the Net GloBE Income (Loss) of the Jurisdiction.

3.2.1.2 Computation of Adjusted Covered Taxes

(a) Total amount of Adjusted Covered Taxes

3.2.1.2.(a).1	The Filing Constituent Entity shall report the aggregate current tax expense (with respect to Covered Taxes accrued in Financial Accounting Net Income or Loss of all the Constituent Entities or members of JV Groups located in the jurisdiction) after the allocation of Covered Taxes from one Constituent Entity to another Constituent Entity. (Art. 111 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) Art. 79 (5) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT also covers the allocation of Covered Taxes from an Investment Entity or an Insurance Investment Entity that is treated as a Tax Transparent Entity as a result of the election. Post-filing adjustments identified in this table do not include the adjustments made for a Fiscal Year other than the Reporting Fiscal Year in accordance with an ETR Adjustment Article. (Art. 68 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT) The post-filing adjustments related to Art. 68 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT are the adjustments resulting in a material decrease in Covered Taxes for a previous Fiscal Year and the adjustments resulting in an immaterial decrease when an election is not made under Art. 68 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.1.2.(a).2.(d)	The Filing Constituent Entity shall report the amount of the adjustment made pursuant to Art. 110 1 c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT in respect of a Qualified Refundable Tax Credit or Marketable Tax Credit that is recorded as a reduction in current income tax expense (or other Covered Taxes) in the financial accounts.

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3.2.1.2.(a).2.(g)	The Filing Constituent Entity shall report the amount of the adjustment made pursuant to Art 110 2 b. and c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT in respect of a non-Qualified Refundable Tax Credit, non-Marketable Transferable Tax Credit or Other Tax Credit that is recorded as income and not as a reduction in current income tax expense (or other Covered Taxes) in the financial accounts.
3.2.1.2.(a).2.(h)	Pursuant to Art. 110 2 d. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, the Filing Constituent Entity shall report the amount of Covered Taxes which were claimed as Covered Tax in a previous fiscal year (subject to GloBE rules) and that is refunded or credited in the current fiscal year. Qualified Refundable Tax Credits and Marketable Transferable Tax Credits are excluded from the scope of application of this rule.
3.2.1.2.(a).2.(s)	The Filing Constituent Entity shall report the Excess Negative Tax Expense Carry-Forward generated for the reporting Fiscal Year pursuant to Art. 116-2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT or an election under Art 119 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT in accordance with related agreed Administrative Instruction. The same amount shall also be reported in 3.2.1.2.(b).2.
3.2.1.2.(a).2.(t)	The Filing Constituent Entity shall report the decrease in Adjusted Covered Taxes in relation to the remaining balance of the Excess Negative Expense Carry-forward pursuant to Art. 116-2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT or an election under Art. 119 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT in accordance with related agreed Administrative Instruction. The decrease is the same amount as reported in 3.2.1.2.(b).3. but cannot exceed the amount of Adjusted Covered Taxes obtained as a result of the other adjustments.
3.2.1.2.(a).3	The Filing Constituent Entity shall report the Adjusted Covered Taxes of all Constituent Entities or members of JV Groups located in the jurisdiction.
(b) Excess Negative Tax Expense Carry-forward	
3.2.1.2.(b).1	The Balance from prior years is the remaining amount of Excess Negative Tax Expense Carry-forward for the jurisdiction that has not yet effectively reduced the amount of Adjusted Covered Taxes for the jurisdiction.
3.2.1.2.(b).2	The Filing Constituent Entity shall report the Excess Negative Tax Expense Carry-forward generated for the Reporting Fiscal Year for the jurisdiction. The Excess Negative Tax Expense Carry-forward generated for the jurisdiction equals the Additional Current Top-up Tax under Art.119 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT for the jurisdiction reported under 3.3.3.2.4 if the election for the Excess Negative Tax expense administrative procedure is made for the Reporting Fiscal Year, pursuant to Art.119 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT and related agreed Administrative Guidance. The Excess Negative Tax Expense attributable to an amount of a loss that is carried back and applied against income for prior taxable years must be deducted from the amount of Excess Negative Tax Expense Carry-forward. Under Art 116-2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, the Excess Negative Tax Expense Carry-forward generated for the jurisdiction is computed for a Fiscal Year in which the MNE Group has a Top-up Tax Percentage for a jurisdiction that exceeds the Minimum Rate due to negative Adjusted Covered Taxes. In such a case, the Excess Negative Tax Expense Carry-forward for the jurisdiction is equal to the absolute amount of negative Adjusted Covered Taxes.
3.2.1.2.(b).3	The Filing Constituent Entity shall report the Excess Negative Tax Expense Carry- forward utilized for the Reporting Fiscal Year for the jurisdiction. The Excess Negative Tax Expense Carry- forward utilised for the jurisdiction shall be the lower of the remaining balance of the Excess Negative Tax Expense Carry-forward and the Adjusted Covered Taxes computed for the reporting Fiscal Year.
3.2.1.2.(b).4	The Negative Tax Expense Carry-forward remaining for subsequent years is the sum of the Balance from prior years and the Excess Negative Tax Expense Carry-forward generated for the Reporting Fiscal Year for the jurisdiction after deducting the Excess Negative Tax Expense Carry-forward utilised for the reporting Fiscal Year.
(c) Transitional Blended CFC Regime calculation (if any)	
3.2.1.2.(c)	The Filing Constituent Entity shall complete this table if Blended CFC Tax is allocated (i) from a Constituent Entity-owner located in this jurisdiction and belonging to this subgroup or (ii) to Constituent Entities located in this jurisdiction and belonging to this subgroup pursuant to Art 111 (1) 5 b. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, and the related Administrative Instruction.

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3.2.1.2.(c).1	The Filing Constituent Entity shall report the jurisdictions where the Constituent Entities which were allocated Blended CFC Tax under the Blended CFC Tax Regime are located. The jurisdictions shall be reported in the form of 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard.
3.2.1.2.(c).2	The Filing Constituent Entity shall report the subgroup of the Constituent Entities which were allocated Blended CFC Tax under the Blended CFC Tax Regime. This subgroup is the same as the one identified in 3.1.3.
3.2.1.2.(c).3	The Filing Constituent Entity shall report the Blended CFC Tax allocated for the Fiscal Year from the Constituent Entity-owner to Constituent Entities located in the jurisdiction identified in the first column.
3.2.2 Jurisdictional computations relating to deferred tax accounting	
3.2.2.1 Deferred Tax adjustments	
(a) High-level summary	
3.2.2.1.(a).1.a	The Filing Constituent Entity shall report the aggregate deferred tax expense amount in the Financial Accounts for all Constituent Entities or members of JV Groups located in the jurisdiction. If the deferred tax expense is recorded as a debit to the deferred tax expense account, the amount shall be presented as a positive number. If the deferred tax expense is recorded as credit to the deferred tax expense account, the amount shall be presented as a negative amount.
3.2.2.1.(a).1.b	The Filing Constituent Entity shall report the deferred tax expense included in the financial accounts in relation to assets or liabilities for which the GloBE carrying value is different to the accounting carrying value for all Constituent Entities or members of JV Groups located in the jurisdiction.
3.2.2.1.(a).1.c	The Filing Constituent Entity shall report the deferred tax expense based on the GloBE carrying value of assets or liabilities for which the GloBE carrying value is different to the accounting carrying value for all Constituent Entities or members of JV Groups located in the jurisdiction.
3.2.2.1.(a).1.d	The Filing Constituent Entity shall report the deferred tax expense for GloBE purposes before any recasting and adjustments.
3.2.2.1.(a).1.2	The total amount of the adjustments shall be the total amount of the adjustments in 3.2.2.1.(b).2.
3.2.2.1.(a).3.e	The Filing Constituent Entity shall report the deferred tax expense for GloBE purposes before any recasting.
3.2.2.1.(a).3.f	The Filing Constituent Entity shall recast at the Minimum Rate any deferred tax asset attributable to a GloBE Loss (Art. 112 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) that was recorded at a lower tax rate and report the amount of the difference between the deferred tax expense recorded at a lower tax rate than the Minimum Rate and the deferred tax expense based on the Minimum Rate. The difference shall be presented as a negative amount when it is attributable to the recognition of a GloBE Loss deferred tax asset, and the difference shall be presented as a positive amount when it is attributable to the reversal of such deferred tax asset.
3.2.2.1.(a).3.g	The Filing Constituent Entity shall recast at the Minimum Rate any deferred tax expense that has been recorded(Art. 67 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT) at a higher tax rate than the Minimum Rate and report the amount of difference between the deferred tax expense recorded at a higher tax rate than the Minimum Rate and the deferred tax expense based on the Minimum Rate. If the deferred tax expense for the Fiscal Year before any recasting is taken into account as a credit to the deferred tax expense account, the amount of the difference shall be presented as a positive amount. If the deferred tax expense before any recasting for the Fiscal Year is taken into account as a debit to the deferred tax expense account, the amount of the difference shall be presented as a negative amount.
3.2.2.1.(a).4	The Filing Constituent Entity shall report the Total Deferred Tax Adjustment Amount for the jurisdiction.
(b) Breakdown of the adjustments	
3.2.2.1.(b)	The Filing Constituent Entity shall report the adjustments determined before any recasting as broken down in the table. If the adjustment leads to an increase to the Total Deferred Tax Adjustment Amount, the amount shall be presented as a positive number. If the adjustment leads to a decrease to the Total Deferred Tax Adjustment Amount, the amount shall be presented as a negative number.
3.2.2.1.(b).1.(f)	The Filing Constituent Entity shall report the adjustments of deferred tax expense in the Financial Accounts related to tax credits before any adjustments for Substitute Loss Carry-forward DTA and deemed Substitute Loss Carry-forward DTA.

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3.2.2.1.(b).1.(g)	The Filing Constituent Entity shall report the adjustments related to Substitute Loss Carry-forward DTA and deemed Substitute Loss Carry-forward DTA pursuant to the related Administrative Guidance.
3.2.2.1.(b).1.(p)	The Filing Constituent Entity shall report the adjustments to the deferred tax expense resulting from transactions between Constituent Entities and the application of Art. 89 2 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.2.1.(b).2	The Filing Constituent Entity shall report the total amount of the adjustments. This total amount shall be the same amount reported in 3.2.2.1.(a).2.
(c) Loss carry backs	
3.2.2.1.(c).1.a,b,etc	The Filing Constituent Entity shall report the amount of deferred tax assets that shall be treated as reversed for a prior Fiscal Year to which the domestic tax loss has been carried back.
3.2.2.1.(c).2.a,b,etc	The Filing Constituent Entity shall report the refund of Covered Taxes relating to a domestic tax loss carried back to a prior Fiscal Year. The amount of the refund shall match with the domestic tax loss that has been carried back to the prior Fiscal Year.
3.2.2.1.(c).1.c	The Filing Constituent Entity shall report the total amount of deemed deferred tax assets that shall be treated as reversed for prior Fiscal Years. This total amount should be capped at an amount equal to the domestic tax loss multiplied by the Minimum Rate as provided in paragraphs 124 through 126 of the Commentary under Art. 68 (1) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.2.1.(c).2.c	The Filing Constituent Entity shall report the total amount of refund of Covered Taxes. This total amount shall be the amount of refund of tax with respect to loss carry backs issued in the Reporting Fiscal Year.
3.2.2.1.(c).1.c and 3.2.2.1.(c).2.c	The difference between the 3.2.2.1.(c).1.c and 3.2.2.1.(c).2.c would be the adjustment to the Covered Tax for the Reporting Fiscal Year with respect to loss carry backs. The amount shall be taken into account for the adjustment under Art. 68 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT for the Reporting Fiscal Year reported in 3.2.1.2.(a).1.(k).
3.2.2.2 Recapture mechanism	
3.2.2.2.(a).1	The Filing Constituent Entity shall report the total amount of DTLs(Art. 113 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT), except for Recapture Exception Accruals, taken into account under Art. 67 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT in computing Adjusted Covered Taxes for the fifth Fiscal Year preceding the Reporting Fiscal Year.
3.2.2.2.(a).2	The Filing Constituent Entity shall report the total amount of Recaptured Deferred Tax Liability determined in the Reporting Fiscal Year in relation to the fifth Fiscal Year preceding the Reporting Fiscal Year. This amount will be used in connection with the reporting requirements related to the Additional Current Top-up Tax are identified in 3.3.3.
3.2.2.2.(a).3	The Filing Constituent Entity shall report the total amount of DTLs, except for Recapture Exception Accruals(Art. 113 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT), taken into account under Art. 67 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT for the Reporting Fiscal Year.
3.2.2.2.(b)	The Filing Constituent Entity shall complete this table with respect to the DTLs tracked on an aggregated basis, i.e. on the basis of a General Ledger account or of an Aggregate DTL Category, excluding DTLs tracked on an item-by-item basis.
3.2.2.2.(b).a	The Filing Constituent Entity shall report the amount of pre-Transition Year DTLs after reversals allocated to pre-Transition Year DTLs for the Reporting Fiscal Year and immediately Prior Fiscal Year.(Art. 113-2 (1) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 74-2 (5) 3 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)
3.2.2.2.(b).b	The Filing Constituent Entity shall report the amount of Outstanding Balance for the Reporting Fiscal Year and immediately Prior Fiscal Year.(Art. 113-2 (1) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)
3.2.2.2.(b).c	The Filing Constituent Entity shall report the amount of Unjustified Balance for the Reporting Fiscal Year and immediately Prior Fiscal Year.(Art. 113-2 (1) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)

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3.2.2.3 Transition rules

3.2.2.3	Row 3.2.2.3.1 (i.e. the Transition Year) shall be reported every year, whereas all the other information of this section shall be reported in the GloBE Information Return only when the Reporting Fiscal Year is also the Transition Year.

(a) Application of Art. 81 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT, Art. 139 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT

3.2.2.3.(a).1	The Deferred tax liabilities at the beginning of the Transition Year is the aggregate amount of Deferred tax liabilities that have been recorded in the financial accounts at the beginning of the Transition Year for a jurisdiction, which shall not include any deferred tax liability arising from a transfer of assets between Constituent Entities or members of JV Groups after 30 November 2021 and before the commencement of a Transition Year. These deferred tax liabilities shall be reflected in the table that relates to the application of Art. 139 (4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 89 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.2.3.(a).2	The recast at the Minimum Rate does not apply if the applicable domestic tax rate is lower than the Minimum Rate.
3.2.2.3.(a).3	The deferred tax assets at the beginning of the Transition Year is the aggregate amount of Deferred tax assets that have been recorded in the financial accounts at the beginning of the Transition Year for a jurisdiction, which shall not include any deferred tax assets arising from a transfer of assets between Constituent Entities or members of JV Groups after 30 November 2021 and before the commencement of a Transition Year. These deferred tax assets shall be reflected in the table that relates to the application of Art. 89 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.2.3.(a).4	The recast at the Minimum Rate does not apply if the applicable domestic tax rate is lower than the Minimum Rate, unless it could be demonstrated that the deferred tax asset is attributable to a GloBE Loss, in this case, the deferred tax asset that has been recorded at a rate lower than the Minimum Rate could be recast at the Minimum Rate.
3.2.2.3.(a).5	Deferred tax assets arising from items excluded from the computation of GloBE Income or Loss under「3. GloBE Computations」should be excluded if such deferred tax assets are generated in a transaction that takes place after 30 November 2021.(Art. 66 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 89 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.)
3.2.2.3.(a).6	Deferred tax assets taken into account for GloBE purposes is the aggregate amount of deferred tax assets that should be recognized for purposes of the GloBE Rules at the beginning of the Transition Year.

(b) Application of Art. 89 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT

3.2.2.3.(b).1	The Filing Constituent Entity shall list all jurisdictions in which disposing Constituent Entities or members of JV Groups are located when such Constituent Entities or members of JV Groups have disposed assets to Constituent Entities or members of JV Groups located in this jurisdiction after 30 November 2021 and before the commencement of a Transition Year. Those jurisdictions in which disposing Constituent Entities or members of JV Group are located could be the same jurisdiction of the acquiring entities. The Filing Constituent Entity shall identify the jurisdiction (in the form of a 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard) of the disposing Constituent Entity or member of JV Group. The Filing Constituent Entity shall report “Stateless” for Stateless Constituent Entities.
3.2.2.3.(b).2	The filing CE shall report the amount of tax paid in respect of the transaction(s).
3.2.2.3.(b).3	The filing CE shall report the net amount of the aggregate pre-existing deferred tax assets or liabilities on the transferred asset(s) reflected in the financial accounts of the disposing Constituent Entity (or Constituent Entities). Deferred tax assets shall be reported as a positive number and deferred tax liabilities shall be reported as a negative number.
3.2.2.3.(b).4	The Carrying Value of the transferred assets for GloBE purposes is the aggregate amount of the Carrying Value of the transferred assets that should be recognised for purposes of the GloBE Rules at the beginning of the Transition Year. This amount shall be determined by adjusting the financial accounting carrying value upon disposition of the transferred asset on the day of the transfer. The financial accounting carrying value upon disposition shall be adjusted as appropriate pursuant to Art. 89 2 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT and further adjusted for capital expenditures, amortization or depreciation that were recorded after the transaction and before the beginning of the Transition Year.

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3.2.2.3.(b).5	The net deferred tax asset or liability with respect to the transferred assets for GloBE purposes is the net amount of the aggregate deferred tax assets and liabilities that should be recognised for purposes of the GloBE Rules at the beginning of the Transition Year with respect to the transferred assets. This amount shall be determined by adjusting the net amount of the aggregate pre-existing deferred tax assets and liabilities as accrued in the financial accounts of the disposing entity prior to the transfer, in relation to the transferred assets. The net amount of the aggregate pre-existing deferred tax assets and liabilities shall be adjusted as appropriate pursuant to Art. 89 3 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. Deferred tax assets shall be reported as a positive number and deferred tax liabilities shall be reported as a negative number.
3.2.3 Jurisdictional elections (if any)	
3.2.3.1. Jurisdictional elections (other than Art. 78 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
3.2.3.1	Jurisdictional elections are elections that apply to all Constituent Entities (or members of a JV Group) located in the jurisdiction
(a) Elections	
3.2.3.1.(a).1.c	If the Filing Constituent Entity does not complete table 3.3.2 for the jurisdiction, it is assumed that the election in 3.2.3.1.(a).1.c to not apply the Substance Based Income Exclusion has been made for the jurisdiction.
3.2.3.1.(a).3	For Five-year Elections, the Filing Constituent Entity shall report the Election Year.
3.2.3.1.(a).4	For Five-year Elections, the Filing Constituent Entity shall report the year where the election was revoked (if any). The Filing Constituent Entity shall report the revocation year in the GloBE Information Return filed for the revocation year and in the GloBE Information Returns filed for the four Fiscal Years succeeding the revocation year.
3.2.3.1.(a).5.j	The Filing Constituent Entity can only make the GloBE Loss Election with the first GloBE Information Return that includes the jurisdiction for which the election is made. If the election is subsequently revoked, the Filing Constituent Entity cannot make a new election for the same jurisdiction.
3.2.3.1.(a).6	The Filing Constituent Entity shall report the year where the election was revoked (if any). The Filing Constituent Entity shall report the revocation year in the GloBE Information Return filed for the revocation year and in the GloBE Information Returns filed for all Fiscal Years succeeding the revocation year.
(b) Information requirements related to jurisdictional elections	
3.2.3.1.(b).1	The Filing Constituent Entity shall report the equity gain or loss that is included in the GloBE Income or Loss when the Equity Investment Inclusion Election is made.
3.2.3.1.(b).2	The Balance of the owner's investment in a Qualified Ownership Interest from prior years is the remaining amount of the owner's investment in Qualified Ownership Interest for the jurisdiction that has not yet reduced by receipts.
3.2.3.1.(b).3	The Filing Constituent Entity shall report the increase in the owner's investment in a Qualified Ownership Interest for the Reporting Fiscal Year for the jurisdiction.
3.2.3.1.(b).4	The Filing Constituent Entity shall report the decrease in the owner's investment in a Qualified Ownership Interest for the Reporting Fiscal Year for the jurisdiction pursuant to the related Administrative Instruction. The decrease cannot exceed the owner's investment and cause the investment below zero.
3.2.3.1.(b).5	The outstanding balance of owner's investment in a Qualified Ownership Interest is the sum of the balance from prior years and additions to the owner's investment in a Qualified Ownership Interest after deducting the receipts with respect to the Qualified Ownership Interest for the Reporting Fiscal Year.
3.2.3.2. Election for Art. 78 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT	
(a) Recapture mechanism for Art. 134 (2), (4) through (8) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, Art. 83 (1) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT	
3.2.3.2.(a).2	The Filing Constituent entity shall report the amount of the Deemed Distribution Tax determined under Art. 134 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT for the Fiscal Year for which it was established.
3.2.3.2.(a).3	At the end of each succeeding Fiscal Year, the outstanding balances of Deemed Distribution Tax Recapture Accounts are reduced in chronological order but not below zero, as provided under Art. 83 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, by the tax paid by the Constituent Entities (or members of JV Groups), by the amount of any Net GloBE Loss of the jurisdiction multiplied by the Minimum Rate and then by the amount of Recapture Account Loss Carry-forward applied to the current Fiscal Year.

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3.2.3.2.(a).4	If there is an outstanding balance on the last day of the fourth Fiscal Year after the Fiscal Year for which the account was established (first row of this table), Art. 78 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies. In the Fiscal Year a Departing Constituent Entity (or member of a JV Group) leaves the MNE Group or transfers substantially all of its assets, Art. 83 (2) through (4) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies. The amount is to be used to determine whether the additional Current Top-up Tax is generated and the result will be presented in 3.3.3.1.
(b) Application of Art 83 (2) through (4) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT	
3.2.3.2.(b).1	The Filing Constituent Entity shall identify all Prior Fiscal Years for which a Deemed Distribution Tax Recapture Account is outstanding is re-calculated in accordance with the principles of Art. 119 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.3.2.(b).2	The incremental top up tax is the total amount of Top-up Tax determined under Art. 119 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT if Art. 83 (2) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies.
3.2.3.2.(b).3	The Disposition Recapture Ratio is defined in Art. 83 (2) 2 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT and determined for each Departing Constituent Entity (member of JV Group) using the following formula: GloBE Income of the CE(or member of JV Group)/Net Income of the jurisdiction.
3.2.4 Constituent Entity Computations	
(a) Election for the transitional simplified jurisdictional reporting framework	
3.2.4.(a).1	The Filing Constituent Entity shall report "Yes" if it elects to apply the transitional simplified jurisdictional reporting framework during the transitional period. If the Filing Constituent Entity elects for the transitional simplified jurisdictional reporting framework, it shall: (i) Complete section 3.2.4 for Constituent Entities or members of JV Groups located in this jurisdiction (and part of subgroup, where relevant) if Top-up Tax liability arises in respect of this jurisdiction and needs to be allocated on a Constituent Entity by Constituent Entity basis (see exceptions where Top-up Tax does not need to be allocated provided in note 3.4.1); and (ii) In any case, report specific information included in the tables below as provided in the explanatory Instructions (see note 3.2.4.1.(a).3.(e), 3.2.4.1.(a).3.(m), 3.2.4.1.(a).3.(u), 3.2.4.1.(a).3.(v) and 3.2.4.1.(a).3.(z), note 3.2.4.1.(c), note 3.2.4.1.(d), note 3.2.4.2.(c).3.(m), note 3.2.4.2.(c).3.(p), note 3.2.4.3, note 3.2.4.4.(a) and Note 3.2.4.4.(b)), for Constituent Entities or members of JV Groups located in this jurisdiction (and part of subgroup, where relevant); (iii) Report the net amount of the adjustments identified in tables 3.2.4.1.(a). and 3.2.4.2.(c). If the net amount for the relevant adjustment is a positive amount, the Filing Constituent Entity shall report it in the "additions". If the net amount for the relevant adjustment is a negative amount, the Filing Constituent Entity shall report it in the "reductions". The transitional simplified jurisdictional reporting framework shall not be elected in respect of a QDMTT Safe Harbour if the QDMTT jurisdiction chose to not apply the transitional simplified jurisdictional reporting framework as provided in the QDMTT Safe Harbour instruction.
(b) Aggregated Reporting for Tax Consolidated Groups	
3.2.4.(b)	The Filing Constituent Entity may elect for aggregate reporting for tax consolidated groups (i.e., treat a tax consolidated group as a single CE for purposes of section 3.2.4) where all the following conditions are met: (i) The taxable profits and losses of the consolidated entities are aggregated for purposes of computing a single tax liability (irrespective of the fact that the consolidated entities might be jointly and severally liable for the tax charge on behalf of the group); (ii) All consolidated entities are wholly- owned by the consolidating entity; (iii) All Constituent Entities or members of a JV Group within the tax consolidated group are located in the same jurisdiction for GloBE purposes; and (iv) The Filing Constituent Entity made an election under Art. 104 (1) 14 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT and Form⑮ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT to consolidate intra-group transactions in the jurisdiction. Section 3.2.4 shall be completed on a CE-by-CE basis with respect to Entities that either joined or left the MNE Group during the Reporting Fiscal Year, irrespective of whether those Entities are (or were) included in a tax consolidation group. Equally, Section 3.2.4 shall be completed on a CE-by-CE basis with respect to Entities that are subject to separate ETR computations under the GloBE Model Rules (e.g., Investment Entities and Insurance Investment Entities), irrespective of whether those Entities are included in a tax consolidated group.

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3.2.4.(b).1	The Filing Constituent Entity shall report the TIN of the tax consolidated group used for purposes of Covered Taxes in the jurisdiction.
3.2.4.(b).2	The Filing Constituent Entity shall report the TIN of the Constituent Entities or members of a JV Group that are aggregated in the tax consolidated group used for purposes of Covered Taxes in the jurisdiction.
3.2.4.1 GloBE Income or Loss	
(a) Adjustments to the Financial Accounts Net Income or Loss	
3.2.4.1.(a)	When the UPE is wholly owned by holders of Ownership Interests in respect of which Art. 77-2 (2) 1 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 133 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, and reported "exception, wholly-owned" in column 3.2.4.1.(d).5, the Filing CE shall not complete Table 3.2.4.1.(a) with respect to the UPE (and with respect to Tax Transparent Entities wholly owned by the UPE through a Tax Transparent Structure and located in the UPE jurisdiction to which Art. 108 (1) 1 b. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies).
3.2.4.1.(a).1	The Filing Constituent Entity shall report the TIN of the Constituent Entity, JV or JV Subsidiary used for purposes of Covered Taxes in the jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.
3.2.4.1.(a).2	The Filing Constituent Entity shall report the FANIL of the Constituent Entity or member of a JV Group after the allocation of GloBE Income or Loss between Main Entities and Permanent Establishments (Art. 107 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) and the allocation of GloBE Income or Loss from Flow-through Entities.(Art. 108 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) Art. 107 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT also covers the allocation of GloBE Income or Loss from an Investment Entity or an Insurance Investment Entity that is treated as a Tax Transparent Entity as a result of the election under Art. 79 (5) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.4.1.(a).3.(e),(m),(u),(v),(z)	The Filing CE shall complete these rows irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.
3.2.4.1.(a).3.(n)	The Filing Constituent Entity shall report the adjustments made to the Financial Accounting Net Income or Loss pursuant to form⑫ and form⑬ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. In particular, any amount that is recorded as a reduction in current income tax expense (or other Covered Taxes) in the financial accounts and that should be treated as income, is included as a positive adjustment and any amount that is recorded as income in the financial accounts and that should be treated as a reduction in current income tax expense (or other Covered Taxes), is included as a negative adjustment.
3.2.4.1.(a).4	The Filing Constituent Entity shall report the GloBE Income (Loss) of the Constituent Entity or member of a JV Group. For Investment Entities, the Filing Constituent Entity shall report the MNE Group's Allocable Share of the Investment Entity's GloBE Income as determined under Art. 135 (2) 2 or 3 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
(b) Cross-border allocation of income or loss between a Main Entity and a PE and from an FTE (Art. 66 (4) through (7) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 107 & 108 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)	
3.2.4.1.(b)	No adjustments are required under Art. 107 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT if, by virtue of maintaining its own (separate)financial accounts in the jurisdiction, the FANIL of the CE (or members of JV Groups) located in the jurisdiction already reflects income or losses attributable to Permanent Establishments in such jurisdiction. Adjustments under Art. 108 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT apply to Flow-Through Entities as well as Constituent Entities or members of JV Groups in respect of which an election is made under Art. 79 (5) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT. The Filing CE shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.
3.2.4.1.(b).1	The Filing Constituent Entity shall report the TIN of the Constituent Entity, JV or JV Subsidiary used for purposes of Covered Taxes in the jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

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3.2.4.1.(b).2	The FANIL of the CE or member of JV Group before the relevant adjustment shall be reported under this column. In the case where multiple adjustments apply, the FANIL to be reported under 3.2.4.1.(b).2 should reflect the FANIL taking into account the preceding adjustment(s).
3.2.4.1.(b).3	The Filing Constituent Entity shall identify the relevant adjustment from the following list: Art. 107 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, Art. 108 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, Art. 108 (1) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT and/or Art. 108 (1) 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT For each type of adjustment, the respective addition or reduction to FANIL of the Constituent Entity or member of JV Group shall be reported. In the case where multiple adjustments apply, one row shall be reported for each option and the relevant options shall be reported in the following order: Art. 107 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, Art. 108 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, Art. 108 (1) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT and/or Art. 108 (1) 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT • The adjustments under Art. 107 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT shall include the adjustments made to allocate GloBE Income or Loss to PEs located in this jurisdiction or Stateless PEs (additions) as well as to allocate GloBE Income or Loss from a Main Entity located in this jurisdiction to a PE (reductions). • The adjustments under Art. 108 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT shall include the reductions to the GloBE Income or Loss of the amount allocated to other owners that are not Group Entities. • The adjustments under Art. 108 (1) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT shall include the reductions to the GloBE Income or Loss of the amount allocated to other owners that are not Group Entities. • The adjustments under Art. 108 (1) 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT shall include the allocation of GloBE Income or Loss from a Flow-through Entity to a PE in this jurisdiction or to this Stateless PE (additions) and the allocation from this Stateless Flow-through Entity (or a Flow-through Entity located in this jurisdiction if it is the UPE) to a PE in another jurisdiction (reductions). • When a Flow-through Entity is treated as a Tax Transparent Entity by some of its owners and a Reverse Hybrid Entity by its other owners, the Filing Constituent Entity shall report the allocation of GloBE Income or Loss to CE owners that are located in a jurisdiction where the Flow-through Entity is treated as fiscally transparent.(Art. 108 (1) 1 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) The GloBE Income or Loss attributable to Ownership Interests held by CE owners that are located in a jurisdiction where the Flow-through Entity is not treated as fiscally transparent is then allocated to the Flow-through Entity under Art. 108 (1) 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.4.1.(b).4	The Filing Constituent Entity shall report the TIN of the other Constituent Entity, JV or JV Subsidiary used for purposes of Covered Taxes in the jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number
3.2.4.1.(b).5	The Filing Constituent Entity shall identify the jurisdiction (in the form of a 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard) of the other Constituent Entity or member of JV Group. The Filing Constituent Entity shall report “Stateless” for Stateless Constituent Entities.
3.2.4.1.(b).6	The amount of any adjustment that increases the GloBE Income of the CE or member of JV Group identified in column 3.2.4.1.(b).1 shall be reported under this column.
3.2.4.1.(b).7	The amount of any adjustment that decreases the GloBE Income of the CE or member of JV Group identified in column 3.2.4.1.(b).1 shall be reported under this column.
3.2.4.1.(b).8	The FANIL of the CE or member of JV Group after the relevant adjustment shall be reported under this column. In the case where multiple adjustments apply, the FANIL to be reported under 3.2.4.1.(b).2 should reflect the FANIL taking into account the adjustment identified in the same row.

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(c) Cross-border adjustments

3.2.4.1.(c)	When the UPE is wholly owned by holders of Ownership Interests in respect of which Art. 77-2 (2) 1 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 133 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, and reported "exception, wholly-owned" in column 3.2.4.1.(d).5, the Filing CE shall not complete Table 3.2.4.1.(c) with respect to the UPE (and with respect to Tax Transparent Entities wholly owned by the UPE through a Tax Transparent Structure and located in the UPE jurisdiction to which Art. 108 (1) 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies). The Filing Constituent Entity shall only report in this table adjustments under Art. 104 (1) 16 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT that relate to transactions between Constituent Entities located in different jurisdictions. The Filing Constituent Entity shall not report the cross-border adjustments under Art. 104 (1) 16 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT when they relate to intragroup transactions that do not exceed EUR 35 million in aggregate during the Reporting Fiscal Year. The Filing CE shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.
3.2.4.1.(c).1	The Filing Constituent Entity shall report the TIN of the Constituent Entity or member of JV Group located in this jurisdiction (or Stateless CE where relevant) for which an adjustment applies. Where a TIN is unavailable, the Filing Constituent Entity shall report a functional equivalent, such as a business/company registration code/number.
3.2.4.1.(c).2	Filing Constituent Entity shall identify whether the adjustment relates to: 1. Form⑨ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT 2. Form⑰ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT
3.2.4.1.(c).3	The Filing Constituent Entity shall report the TIN of the other CE or member of JV Group involved in the adjustment identified. Where a TIN is unavailable, the Filing Constituent Entity shall report a functional equivalent, such as a business/company registration code/number.
3.2.4.1.(c).4	The Filing Constituent Entity shall identify the jurisdiction (in the form of a 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard) of the other Constituent Entity or member of JV Group involved in the adjustment. The Filing Constituent Entity shall report "Stateless" for Stateless Constituent Entities.
3.2.4.1.(c).5	The amount of any adjustment that increases the GloBE Income of the CE or member of JV Group identified in column 3.2.4.1.(c).1 shall be reported under this column.
3.2.4.1.(c).6	The amount of any adjustment that decreases the GloBE Income of the CE or member of JV Group identified in column 3.2.4.1.(c).1 shall be reported under this column. The adjustment under Form⑨ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT that excludes expenses will result in an addition to the GloBE Income. Therefore, column 6 is not likely to be used for purposes of those adjustments.

(d) Adjustments to the GloBE Income of the UPE under Art. 77-2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT

3.2.4.1.(d)	The Filing Constituent Entity shall complete this table in cases where Art.77-2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies. The Filing CE shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.
3.2.4.1.(d).1	When Art.77-2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the CE located in this jurisdiction is the UPE of the MNE Group. In that case, the Filing Constituent Entity shall report "UPE". If Art.77-2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall report the TIN of the Permanent Establishments to which Article Art.77-2 (3) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number. If Art.77-2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall report the TIN of the Constituent Entities to which Art. 77-2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number. When Art.77-2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies to a members of a JV Group, the Filing Constituent Entity shall report the TIN of the JV Group members.
3.2.4.1.(d).2	The Filing Constituent Entity shall report the Article (i.e) 1. Art. 77-2 (1) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT 2. Art. 77-2 (2) 1 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT 3. Art. 77-2 (2) 2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT 4. Under Art. 132 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, UPE that reduces its GloBE income shall its Covered Taxes(other than the Taxes for which the dividend deduction was allowed) proportionally and shall reduce it GloBE income by the same amount. that applies, together with the relevant subparagraph letter and number.

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3.2.4.1.(d).3	The Filing Constituent Entity shall complete a separate row for each holder of Ownership Interests (respectively, dividend recipient) in respect of Art. 132 (1) 1 a. or Art. 132 (1) 1 c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. The Filing Constituent Entity shall identify the Natural Persons in the aggregate. The Filing Constituent Entity shall identify the holders of Ownership Interests (respectively, dividend recipients) for which a reduction of the GloBE Income applies as follows: (a) Each holder of Ownership Interests (respectively, dividend recipient) in respect of Art.77-2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT(respectively, dividend recipient) applies, is identified through the reporting of: (i) Its TIN; (ii) The jurisdiction where it is a tax resident; and (iii) The nominal tax rate or the expected aggregate tax rate (percentage) applicable when comparing the aggregate amount of Adjusted Covered Taxes of the UPE and taxes of the holder of the Ownership Interest on the excluded income (respectively, the taxes paid by the dividend recipient on the dividend income) with the amount of excluded income. In the situation where multiple nominal tax rates apply to the holder of the Ownership Interest, the Filing Constituent Entity may report in (iii) the lowest nominal tax rate applicable (provided that rate exceeds 15%) instead of the nominal tax rate. If the dividend recipient is a natural person, the jurisdictions where the natural persons are tax resident shall be reported instead, together with the number of natural persons that are tax resident in each jurisdiction.(Art. 132 (1) 1 a. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) (b) The total number of Natural Persons shall be reported instead of identifying such Natural Persons.(Art. 133 (1) 2 and 132 (1) 1 b. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) (c) Each holder of Ownership Interests (respectively, dividend recipient) is identified through the reporting of(Art. 133 (1) 3, Art. 132 (1) 1 c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT): (i) Its TIN (or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number); and (ii) the type of entity (Governmental Entity, International Organisation, Non-profit Organisation, Pension Fund or, for purposes of Art. 132 (2) 1 c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, Pension Fund that is not a Pension Services Entity).
3.2.4.1.(d).4	The Filing Constituent Entity shall report (in percentage) the Ownership Interests directly held in the UPE by each holder identified in 3.2.4.1.(d).3.
3.2.4.1.(d).5	The amount of any adjustment that decreases the GloBE Income of the CE or member of JV Group identified in column 3.2.4.1.(d).1 shall be reported under this column. If Art. 77-2 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall report the GloBE Income or (Loss) attributable to each Ownership Interest in 3.2.4.1.(d).4. If Art. 77-2 (1) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall report the amount of Deductible Dividends distributed to each shareholder (i.e., dividend recipient) identified in 3.2.4.1.(d).3. When the UPE is wholly owned by holders of Ownership Interests (identified in column 3.2.4.1.(d).3 in respect of which Art. 77-2 (2) 1 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 133 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall only report "exception, wholly-owned" in this column (and shall not report the amount of any adjustment). The same exception could apply in respect of Tax Transparent Entities wholly owned by the UPE through a Tax Transparent Structure and located in the UPE jurisdiction.
3.2.4.2 Adjusted Covered taxes	
(a) Adjustments to the Current tax expense in the Financial Accounts	
3.2.4.2.(a)	When the UPE is wholly owned by holders of Ownership Interests in respect of which Art. 77-2 (2) 1 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 133 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, and reported "exception, wholly-owned" in column 3.2.4.1.(d).5, the Filing CE shall not complete Table 3.2.4.2.(a) with respect to the UPE (and with respect to Tax Transparent Entities wholly owned by the UPE through a Tax Transparent Structure and located in the UPE jurisdiction to which Art. 108 (1) 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies).
3.2.4.2.(a).1	The Filing Constituent Entity shall report the TIN of the Constituent Entity or member of JV Group used for purposes of Covered Taxes in the jurisdiction or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.

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3.2.4.2.(a).2	The Filing Constituent Entity shall report the current tax expense (with respect to Covered Taxes accrued in Financial Accounting Net Income or Loss of the Constituent Entity or member of a JV Group) after the allocation of Covered Taxes from one Constituent Entity or member of JV Group to another Constituent Entity or member of JV Group(Art. 67 (1) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT). Art. 67 (1) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT also covers the allocation of Covered Taxes from an Investment Entity or an Insurance Investment Entity that is treated as a Tax Transparent Entity as a result of the election under Art. 79 (5) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT. Post-filing adjustments identified in this table do not include the adjustments made for a Fiscal Year other than the Reporting Fiscal Year in accordance with an ETR Adjustment Article. The post-filing adjustments related to Art. 68 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT are the adjustments resulting in a material decrease in Covered Taxes for a previous Fiscal Year and the adjustments resulting in an immaterial decrease when an election is not made under Art. 68 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.4.2.(a).3.(c)	The Filing Constituent Entity shall report the amount of the adjustment made pursuant to Art. 110 1 c. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT in respect of a Qualified Refundable Tax Credit or Marketable Tax Credit that is recorded as a reduction in current income tax expense (or other Covered Taxes) in the financial accounts.
3.2.4.2.(a).3.(f)	The Filing Constituent Entity shall report the amount of the adjustment made pursuant to Art. 110 2 b. and c of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT in respect of a non-Qualified Refundable Tax Credit, non-Marketable Transferable Tax Credit or Other Tax Credit that is recorded as income and not as a reduction in current income tax expense (or other Covered Taxes) in the financial accounts.
3.2.4.2.(a).3.(g)	Pursuant to Art. 110 2 d. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, the Filing Constituent Entity shall report the amount of Covered Taxes which were claimed as Covered Tax in a previous fiscal year (subject to GloBE rules) and that is refunded or credited in the current fiscal year. Qualified Refundable Tax Credits and Marketable Transferable Tax Credits are excluded from the scope of application of this rule.
3.2.4.2.(a).3.(n)	The Filing Constituent Entity shall only complete this row when Art. 134 (7) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. apply.
3.2.4.2.(a).3.(p)	Total Deferred Tax Adjustment Amount should not include any deferred tax expense arising in the jurisdiction of the Permanent Establishment with respect to losses for which the GloBE Loss of a Permanent Establishment is treated as an expense of the Main Entity pursuant to Art. 66 (5) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.4.2.(a).4	The Filing Constituent Entity shall report the Adjusted Covered Taxes of the Constituent Entity or member of a JV Group. For Investment Entites, the Filing Constituent Entity shall report the Investment Entity's Adjusted Covered Taxes as determined under Art. 135 (2) 1 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.

(b) Cross allocation of taxes

3.2.4.2.(b)	The Filing CE shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework. When the GIR is filed for QDMTT purposes, the Filing Constituent Entity shall not report the Covered Tax expense of: (i) A Constituent Entity-owner under a CFC Tax Regime that is allocable to a domestic Constituent Entity under Art. 111 (1) 5 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT; (ii) A Main Entity that is allocable under Art. 111 (1) 1 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT to a Permanent Establishment located in the jurisdiction; (iii) A Constituent Entity-owner on income of a Hybrid Entity or a Reverse Hybrid Entity that is allocable under Art. 111 (1) 3 or 3-2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT to a Hybrid Entity or Reverse Hybrid Entity that is either located in the jurisdiction or is included in the scope of the QDMTT because the QDMTT applies to stateless Flow-through Entities created in the QDMTT jurisdiction; and (iv) A Constituent Entity-owner (e.g. net basis taxes), other than a withholding tax imposed by the QDMTT jurisdiction, that is allocable to a distributing Constituent Entity located in the jurisdiction under Art. 111 (1) 4 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. However, the Filing Constituent Entity shall report those amounts with respect to the Covered Tax Expense that is included in the financial accounts of a Constituent Entity-owner or Main Entity located in the QDMTT jurisdiction and for which an adjustment has to be made.

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3.2.4.2.(b).1	The Filing Constituent Entity shall report the TIN of the Constituent Entity (or member of JV Group) or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.
3.2.4.2.(b).2	The Filing Constituent Entity shall report the Covered Taxes of the Constituent Entity (or member of JV Group) before the adjustment.
3.2.4.2.(b).3	The Filing Constituent Entity shall identify the relevant subparagraph of Art. 111 (1) 5 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT(Art. 69 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) that applies. The Filing Constituent Entity shall identify separately the allocation results from the application of a Blended CFC regime - Blended CFC regime". When Art. 111 (1) 3 or Art. 111 (1) 5 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, for purpose of columns 3.2.4.2.(b).6 and 3.2.4.1.(b).7, the Filing Constituent Entity shall complete a first row with the amount before the adjustment under Art. 70 (1) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT(indicating the relevant Art. 111 (1) 1 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT in column 3.2.4.2.(b).3.) and a second row with the amount after the adjustment under Art. 70 (1) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT (indicating the relevant Art. in column 3.2.4.2.(b)3, as well as the relevant Art. 111 (1) 1 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT). • Art. 111 (1) 1 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT • Art. 111 (1) 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT • Art. 111 (1) 3 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT • Art. 111 (1) 4 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT • Art. 111 (1) 5 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT • Art. 111 (1) 6 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT • Art. 70 (1) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT
3.2.4.2.(b).4	The Filing Constituent Entity shall report the TIN of the other Constituent Entity (or member of JV Group) or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.
3.2.4.2.(b).5	For allocation of Covered Tax from a Constituent Entity (or member of JV Group) to another Constituent Entity (or member of JV Group), the Filing Constituent Entity shall identify the jurisdiction (in the form of a 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard) of the other Constituent Entity (or member of JV Group). If the other Constituent Entity is a Stateless Constituent Entity, the Filing Constituent Entity shall report "Stateless".
3.2.4.2.(b).6	The Filing Constituent Entity shall report the additions to Covered Taxes of the Constituent Entity (or member of JV Group) identified in column 3.2.4.2.(b).1. The cross-allocation of taxes covers both current tax expense and deferred tax expense.
3.2.4.2.(b).7	The Filing Constituent Entity shall report the reductions to Covered Taxes of the Constituent Entity (or member of JV Group) identified in column 3.2.4.2.(b).1. The cross-allocation of taxes covers both current tax expense and deferred tax expense.
(C) Deferred tax expense	
3.2.4.2.(c)	When the UPE is wholly owned by holders of Ownership Interests in respect of which Art. 77-2 (2) 1 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT and Art. 133 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, and reported "exception, wholly-owned" in column 3.2.4.1.(d).5, the Filing CE shall not complete Table 3.2.4.2.(c) with respect to the UPE (and with respect to Tax Transparent Entities wholly owned by the UPE through a Tax Transparent Structure and located in the UPE jurisdiction to which Art. 108 (1) 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies).
3.2.4.2.(c).1	The Filing Constituent Entity shall report the TIN of the Constituent Entity (or member of JV Group) or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.
3.2.4.2.(c).2	The Filing Constituent Entity shall report the Deferred tax expense amount for GloBE purposes for the Constituent Entity (or member of JV Group) before any recasting and adjustments. In case there is a divergence between the carrying value of an asset or liability for financial accounting and GloBE purposes, the portion of the deferred tax expense must be calculated on the basis of the GloBE carrying value pursuant to the Art. 112 (1) 1 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. If the deferred tax expense is taken into account as a debit to the deferred tax expense account, the amount shall be presented as a positive number. If the deferred tax expense is taken into account as credit to the deferred tax expense account, the amount shall be presented as a negative amount.
3.2.4.2.(c).3	The Filing Constituent Entity shall report the amount of each adjustment to the Constituent Entity (or member of JV Group)'s Deferred tax expense before any recasting. If the adjustment leads to an increase to the Total Deferred Tax Adjustment Amount, the amount shall be presented as an addition. If the adjustment leads to a decrease to the Total Deferred Tax Adjustment Amount, the amount shall be presented as a reduction.
3.2.4.2.(c).3.(m) and 3.2.4.2.(c).3.(p)	The Filing CE shall complete these rows irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.

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3.2.4.2.(c).4	The Filing Constituent Entity shall recast at the Minimum Rate any deferred tax asset attributable to a GloBE Loss (Art. 112 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) that was recorded at a lower tax rate and report the amount of the difference between the deferred tax expense recorded at a lower tax rate than the Minimum Rate and the deferred tax expense based on the Minimum Rate. The difference shall be presented as a reduction when it is attributable to the recognition of a GloBE Loss deferred tax asset, and the difference shall be presented as an addition when it is attributable to the reversal of such deferred tax asset.
3.2.4.2.(c).5	The Filing Constituent Entity shall recast at the Minimum Rate any deferred tax expense that has been recorded at a higher tax rate than the Minimum Rate and report the amount of the difference between the deferred tax expense recorded at a higher tax rate than the Minimum Rate and the deferred tax expense based on the Minimum Rate. If the deferred tax expense for the Fiscal Year before any recasting is taken into account as a credit to the deferred tax expense account, the amount of the difference shall be presented as an addition. If the deferred tax expense before any recasting for the Fiscal Year is taken into account as a debit to the deferred tax expense account, the amount of the difference shall be presented as a reduction.
3.2.4.2.(c).6	The Filing Constituent Entity shall report the Total Deferred Tax Adjustment Amount for the Constituent Enti ty (or member of JV Group).
3.2.4.3 Constituent Entity elections (or elections that apply to a JV Group)	
3.2.4.3	The Filing CE shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.
3.2.4.3.4	For Five-year Elections, the Filing Constituent Entity shall report the Election Year.
3.2.4.3.5	For Five-year Elections, the Filing Constituent Entity shall report the year where the election was revoked (if any). The Filing Constituent Entity shall report the revocation year in the GloBE Information Return filed for the revocation year and in the GloBE Information Returns filed for the four Fiscal Years succeeding the revocation year.
3.2.4.3.c	The Filing Constituent Entity can make an Unclaimed Accrual Annual Election with respect to DTLs that it expects will reverse in more than five years after accrual.
3.2.4.3.i	The Filing Constituent Entity can make an Unclaimed Accrual Five-Year Election under Art. 113-2 (2) 2 through 3 with respect to a DTL for a GL account or an Aggregated DTL Category irrespective of any expectations about the reversal time period of such DTLs.
3.2.4.3.j	The Filing Constituent Entity can make a GloBE Loss Election(Art. 67 (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT) under Art. 113-3 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT with respect to a Flow-through Entity that is the UPE. An election under Art. 113-3 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT is independent of the GloBE Loss Election made for any jurisdiction in row 3.2.3.1.(a).5.i. Other Entities are not aggregated with the Flow-through Entity that is a UPE for purposes of calculating the GloBE Loss even if a GloBE Loss Election has been made under Art. 67 (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT for the jurisdiction in which the UPE is located.
3.2.4.3.k.1	The Filing Constituent Entity shall report the Constituent Entities (or members of JV Groups) for which the election under Art. 76 (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies.
3.2.4.3.k.2	The Filing Constituent Entity shall report the Fiscal Year of the even that triggered the tax adjustment (i.e. triggering event).
3.2.4.3.k.3	The Filing Constituent Entity shall report (i) if the net of the total amounts determined under Art. 76 (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT is included in the computation of the GloBE Income or Loss in the Fiscal Year in which the triggering event(Art. 129 (4) 3 a. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) occurs. The Filing Constituent Entity shall report (ii), if amount equal to the net total of the amounts divided by five is included in the computation of the GloBE Income or Loss in the Fiscal Year in which the triggering event (Art. 129 (4) 3 b. of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) occurs and in each of the immediate four subsequent Fiscal Years.
3.2.4.4 International shipping income exclusion	
(a) International shipping income exclusion	
3.2.4.4.(a)	The Filing CE shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.
3.2.4.4.(a).1	The Filing Constituent Entity shall report the TIN (or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number) of the Constituent Entity, or the member of a JV Group to which the International Shipping Income or Qualified Ancillary International Shipping Income exclusion applies.

Instructions	
3.2.4.4.(a).2	The Filing Constituent Entity shall report all of the relevant activities specified in Art. 106 (1) 1 through 6 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT in respect of which International Shipping Income was obtained (several options can apply).
3.2.4.4.(a).3~5	The Filing Constituent Entity shall report the aggregate revenue derived from and costs attributable to all relevant activities specified in Art. 106 (1) 1 through 6 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, as well as the aggregate International Shipping Income of the Constituent Entity.
3.2.4.4.(a).6	The filing Constituent Entity shall report all of the relevant activities specified in Art. 106 (2) 1 through 5 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT in respect of which Qualified Ancillary Shipping Income was obtained (several options can apply).
3.2.4.4.(a).7~9	The Filing Constituent Entity shall report the aggregate revenue derived from and costs attributable to each relevant activity specified in Art. 106 (2) 1 through 5 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, as well as the aggregate Qualified Ancillary International Shipping Income of the Constituent Entity (or member of JV Group).
3.2.4.4.(a).10	The Filing Constituent Entity shall report the payroll costs attributable to International Shipping Income or Qualified Ancillary International Shipping Income.
3.2.4.4.(a).11	The Filing Constituent Entity shall report the carrying value of tangible assets used in the generation of International Shipping Income or Qualified Ancillary International Shipping Income (other than attributable to excess income over the cap for Qualified Ancillary International Shipping Income).
3.2.4.4.(a).12	The Filing Constituent Entity shall report any Covered Taxes associated with the excluded International Shipping Income or Qualified Ancillary International Shipping Income.
(b) Jurisdictional cap for the qualified ancillary international shipping income exclusion	
3.2.4.4.(b)	The Filing CE shall complete this table irrespective of whether it elects for the transitional simplified jurisdictional reporting framework.
3.2.4.4.(b).1	The Filing Constituent Entity shall report the total International Shipping Income for the CEs or members of JV Group of the relevant subgroup identified in Section 3.1.3 and located in the jurisdiction.
3.2.4.4.(b).2	The Filing Constituent Entity shall report the amount of the 50% cap.
3.2.4.4.(b).3	The Filing Constituent Entity shall report the total Qualified Ancillary International Shipping Income for all CEs or members of JV Group of the relevant subgroup identified in Section 3.1.3 and located in the jurisdiction.
3.2.4.4.(b).4	The Filing Constituent Entity shall report the excess of the cap if the Total Qualified Ancillary International Shipping Income for all CEs or members of JV Group of the relevant subgroup identified in Section 3.1.3 exceeds 50% of the Total International Shipping Income for all CEs or members of JV Group of the relevant subgroup identified in Section 3.1.3, such excess income being included in the GloBE Income. To the extent that direct or indirect costs are attributable to income from qualified ancillary activities in excess of the 50% limitation under Art. 106 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT, those costs are taken into account in the computation of a CE's GloBE Income (or the GloBE Income of a member of a JV Group) because the related income is included in the computation as well. The payroll costs and the carrying value of tangible assets attributable to a Constituent Entity's excess income (or the excess income of a member of a JV Group) over the cap for the Qualified Ancillary International Shipping Income shall be included in the payroll carve-out and the tangible asset carve-out computation.
3.2.4.5 Information for purposes of Art. 79 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT (if applicable)	
3.2.4.5.1	The Filing Constituent Entity shall report the TIN of the Constituent Entity-owner (or member of JV Group) for which the election under Art. 79 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies.
3.2.4.5.2	The Filing Constituent Entity shall report the TIN of the Investment Entity in which the Constituent Entity-owner (or member of JV Group) has an Ownership Interest and for which the election under Art. 79 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT is made.
3.2.4.5.3	The Filing Constituent Entity shall report the amount of distributions and deemed distributions of the Investment Entity's GloBE Income received by the Constituent Entity-owner. (Art. 137 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)
3.2.4.5.4	The Filing Constituent Entity shall report the Local Creditable Tax Gross-up incurred by the Investment Entity that is allowed as a credit against the Constituent Entity-owner's tax liability arising in connection with a distribution from the Investment Entity. (Art. 137 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)

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3.2.4.5.5	If the Investment Entity has an Undistributed Net GloBE Income for the Tested Year, the Filing Constituent Entity shall report the Constituent Entity-owner's proportionate share of the Investment Entity's Undistributed Net GloBE Income for the Tested Year. (Art. 137 (4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT)
3.2.4.6 Other Accounting Standard	
3.2.4.6.1	The Filing Constituent Entity shall report: (i) The Constituent Entities located in the jurisdiction for which the Financial Accounting Net Income or Loss is based on an Acceptable Financial Accounting Standard or an Authorised Financial Accounting Standard other than the accounting standard used for the Consolidated Financial Statements of the UPE as provided under Art. 66 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT; (ii) The JV Subsidiaries located in the jurisdiction for which the Financial Accounting Net Income or Loss is based on an Acceptable Financial Accounting Standard or an Authorised Financial Accounting Standard other than the accounting standard used for the Consolidated Financial Statements of the Joint Venture as provided under Art. 105 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT; and (iii) The Joint Venture located in the jurisdiction for which the Financial Accounting Net Income or Loss is based on an Acceptable Financial Accounting Standard or an Authorised Financial Accounting Standard other than the accounting standard used for the Consolidated Financial Statements of the UPE as a result of Art. 130 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.2.4.6.2	The Filing Constituent Entity shall report the Acceptable Financial Accounting Standard or the Authorised Financial Accounting Standard that is used for the computation of the Financial Accounting Net Income or Loss of the Constituent Entity, Joint Venture or JV Subsidiary.
3.3 Top-up Tax computation	
3.3.1 Top-up Tax	
3.3.1.a	The Filing Constituent Entity shall report the Top-up Tax Percentage for the jurisdiction.
3.3.1.b	The Filing Constituent Entity shall report the Substance-based Income Exclusion for the jurisdiction.
3.3.1.c	The Filing Constituent Entity shall report the Excess Profit for the jurisdiction.
3.3.1.d	The Filing Constituent Entity shall report the Additional Current Top-up Tax for the jurisdiction.
3.3.1.e	The Filing Constituent Entity shall report the QDMTT payable in the jurisdiction.
3.3.1.f	The Filing Constituent Entity shall report the Jurisdictional Top-up Tax.
3.3.2 Computation of Substance-based Income Exclusion (if applicable)	
3.3.2.1 Total amount of the Substance Based Income Exclusion	
3.3.2.1	If the Filing Constituent Entity does not complete the table for the jurisdiction, it is assumed that the election to not apply the Substance Based Income Exclusion in 3.2.3.1.(a).1.c has been made.
3.3.2.1.1	The relevant Eligible Payroll Costs of Eligible Employees performing activities in the jurisdiction shall not include payroll costs that are: (i) capitalised and included in the carrying value of Eligible Tangible Assets; or (ii) attributable to a Constituent Entity's International Shipping Income and Qualified Ancillary International Shipping Income. Where the employee undertakes 50% or less of their activities for the MNE Group during the Reporting Fiscal Year within the jurisdiction of the employer, the relevant Eligible Payroll Costs of Eligible Employees shall only take into account the proportion of the payroll costs attributable to the employee's working time spent within the jurisdiction of the employer pursuant to the related Administrative Guidance. The relevant Eligible Payroll Costs of Eligible Employees shall not include an amount of Eligible Payroll Cost attributable to the income excluded from the GloBE Income of the Ultimate Parent Entity under Art. 80 3 a. of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT pursuant to the related Administrative Guidance. When an Entity becomes or ceases to be a Constituent Entity of an MNE Group as a result of a transfer of direct or indirect Ownership Interests in such Entity, the computation of the target's Eligible Payroll Costs shall take into account only those costs reflected in the Consolidated Financial Statements of the Ultimate Parent Entity as provided under Art. 80 3 a. of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.

Instructions	
3.3.2.1.2	The Filing Constituent Entity shall report the application of the relevant mark-up percentage for the Reporting Fiscal Year.
3.3.2.1.3	The carrying value of relevant Eligible Tangible Assets located in the jurisdiction shall not include: (i) the carrying value of property (including land or buildings) that is held for sale, finance lease or investment; and (ii) the carrying value of tangible assets used in the generation of the Constituent Entity's International Shipping Income and Qualified Ancillary International Shipping Income. Where the tangible asset is located within the jurisdiction of its owner (or lessee, if applicable) 50% or less of the time during the Reporting Fiscal Year, the carrying value of relevant Eligible Tangible Assets shall only take into account the carrying value of the asset attributable to the time the asset was located within the jurisdiction of the owner (respectively the lessee, if applicable) pursuant to the related Administrative Guidance. The carrying value of relevant Eligible Tangible Assets shall not include the carrying value of Eligible Tangible Assets proportionately attributable to the income excluded from the GloBE Income of the Ultimate Parent Entity under Art. 77-2 (1) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT pursuant to the related Administrative Guidance. When an Entity becomes or ceases to be a Constituent Entity of an MNE Group as a result of a transfer of direct or indirect Ownership Interests in such Entity, the computation of carrying value of the target's Eligible Tangible Assets shall be adjusted proportionally to correspond with the length of the relevant Fiscal Year that the target was a member of the MNE Group as provided under Art. 80 3 b. of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.3.2.1.4	The Filing Constituent Entity shall report the application of the relevant mark-up percentage for the Reporting Fiscal Year.
3.3.2.1.5	The Filing Constituent Entity shall report the Substance-based Income Exclusion for the jurisdiction.
3.3.2.2. Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets to Permanent Establishments for purposes of the Substance Based Income Exclusion	
3.3.2.2.1	The Filing Constituent Entity shall report the aggregate Relevant Eligible Payroll Costs for all Main Entities located in the jurisdiction before any adjustment under Art. 75 (9) and Art. 75 (10) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.(i.e. allocation to Permanent Establishments).
3.3.2.2.2	The Filing Constituent Entity shall report the aggregate carrying value of the Relevant Eligible Tangible Assets for all Main Entities located in the jurisdiction before any adjustment under Art. 75 (9) and Art. 75 (10) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT (i.e. allocation to Permanent Establishments).
3.3.2.2.3	The Filing Constituent Entity shall identify the jurisdiction (in the form of a 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard) where the Permanent Establishments are located for GloBE purposes. The Filing Constituent Entity shall complete a separate row for each jurisdiction where Permanent Establishments that are allocated Eligible Payroll Costs and carrying value of Eligible Tangible Assets under Art. 75 (9) and Art. 75 (10) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT are located. The Filing Constituent Entity shall report "Stateless" if the Permanent Establishment is Stateless for GloBE purposes.
3.3.2.2.4	The Filing Constituent Entity shall report the aggregate relevant Eligible Payroll Costs allocated to Permanent Establishments located in each jurisdiction identified in the 3.3.2.2.3 column under Art. 75 (9) and Art. 75 (10) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT Eligible Payroll Costs of Constituent Entities or members of JV Groups whose income has been wholly or partly excluded in accordance with Art. 108 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT or Art. 77-2 (3) of ADJUSTMENT OF INTERNATIONAL TAXES ACT are excluded from the Substance-based Income Exclusion computations in the same proportion.
3.3.2.2.5	The Filing Constituent Entity shall report the aggregate carrying value of the relevant Eligible Tangible Assets allocated to Permanent Establishments located in each jurisdiction identified in the 3.3.2.2.3 column under Art. 75 (9) and Art. 75 (10) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. The carrying value of Eligible Tangible Assets of Constituent Entities or members of JV Groups whose income has been wholly or partly excluded in accordance with Art. 108 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT or Art. 77-2 (3) of ADJUSTMENT OF INTERNATIONAL TAXES ACT are excluded from the Substance-based Income Exclusion computations in the same proportion.
3.3.2.2.4 and 3.3.2.2.5	The Eligible Payroll Costs and Eligible Tangible Assets of a Permanent Establishment are not taken into account for the Eligible Payroll Costs and Eligible Tangible Assets of the Main Entity (i.e. the Eligible Payroll Costs and Eligible Tangible Assets of the Main Entity are reduced, respectively, by the Eligible Payroll Costs and Eligible Tangible Assets allocated to its Permanent Establishments).

Instructions	
3.3.2.3. Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets of a Flow-through Entity for purposes of the Substance Based Income Exclusion	
3.3.2.3.1	The Filing Constituent Entity shall report the aggregate relevant Eligible Payroll Costs for all Flow-through Entities located in the jurisdiction after any adjustments under Art. 75 (9) and Art. 75 (10) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT and before any adjustments under Art. 75 (11) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.3.2.3.2	The Filing Constituent Entity shall report the aggregate carrying value of the relevant Eligible Tangible Assets for all Flow-through Entities located in the jurisdiction after any adjustments under Art. 75 (9) and Art. 75 (10) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT and before any adjustments under Art. 75 (11) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.3.2.3.3	If Art. 75 (11) 1 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall report the 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard for the jurisdiction where the Constituent Entity-owners (or members of JV Group) are located for GloBE purposes. The Filing Constituent Entity shall report "Stateless" for each Stateless Constituent Entity-owner. The Filing Constituent Entity shall complete a separate row for each jurisdiction where Constituent Entity-owners (or members of JV Group) that are attributed Eligible Payroll Costs and Eligible Tangible Assets under Art. 75 (11) 1 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT are located. If Art. 75 (11) 2 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall report "UPE" in a separate row (for Eligible Payroll Costs and Eligible Tangible Assets that are allocated to the UPE after the application of Art. 77-2 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT) The Filing Constituent Entity shall report "Not applicable" for all other Eligible Payroll Costs and Eligible Tangible Assets that are excluded from the Substance-based Income Exclusion computations of the MNE Group under Art. 75 (11) 2 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.3.2.3.4	If Art. 75 (11) 1 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall report the aggregate relevant Eligible Payroll Costs allocated to Constituent Entity-owners (or members of JV Groups) located in each jurisdiction identified in the 3.3.2.3.3 column. If Art. 75 (11) 2 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall report the Eligible Payroll Costs that are attributed to the UPE after the application of Art. 77-2 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT. The Filing Constituent Entity shall report the Eligible Payroll Costs that are excluded under Art. 75 (11) 3 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT from the Substance-based Income Exclusion.
3.3.2.3.5	If Art. 75 (11) 1 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall report the aggregate carrying value of the relevant Eligible Tangible Assets allocated to Constituent Entity-owners (or members of JV Groups) located in each jurisdiction identified in the 3.3.2.3.3 column. If Art. 75 (11) 2 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall report the carrying value of the relevant Eligible Tangible Assets that are attributed to the UPE after the application of Art. 77-2 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT. The Filing Constituent Entity shall report the carrying value of the relevant Eligible Tangible Assets that are excluded under Art. 75 (11) 3 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT from the Substance-based Income Exclusion.
3.3.2.3.4 and 3.3.2.3.5	Eligible Payroll Costs and Eligible Tangible Assets are excluded under Art. 75 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT from the Substance-based Income Exclusion to the extent that they are associated with: (i) FANIL allocated to a Reverse Hybrid Entity; (ii) FANIL excluded from the GloBE Income or Loss unde Art. 108 (3) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT (i.e. attributable to non-Group members); (iii) FANIL excluded from the GloBE Income or Loss under Art. 77-2 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT (i.e. UPE Flow-through Entities); and (iv) FANIL attributed to a Constituent Entity-owner (or member of JV Group) when the Eligible Employees and Eligible Tangible Assets are not located in the jurisdiction of the CE-owner.

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3.3.3 Additional Current Top-up Tax

3.3.3.1. Additional Current Top-up Tax for purposes other than Art. 119 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT

3.3.3.1	The Filing Constituent Entity shall complete this table if an ETR Adjustment Article applies.
3.3.3.1.1	The Filing Constituent Entity shall select all the ETR Adjustment Articles that require or permit a recalculation of the ETR and Top-up Tax for a prior Fiscal Year under Art. 119 (1) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. The relevant option(s) should be selected from the following list: • Form⑩ of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT • Art. 67 (3) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT • Art. 68 (1) and Art. 68 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT • Art. 68 (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT • Art. 78 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT • Art. 83 (2) & (3) of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL ACT
3.3.3.1.2	The Filing Constituent Entity shall report the prior Fiscal Year(s) to which the ETR Adjustment Articles reported in 3.3.3.1.1 apply.
3.3.3.1.4 ~ 9.a	The amount as previously reported shall take into account any adjustments required by the relevant ETR Adjustment Articles in a prior Fiscal Year (if any).
3.3.3.1.4 ~ 9.b	The amount recalculated shall take into account any adjustments required by the relevant ETR Adjustment Articles applied in a prior Fiscal Year (if any) and in the Reporting Fiscal Year.
3.3.3.1.10	The Additional Current Top-up Tax is equal to the difference between the Top-up Tax as previously reported and Top-up Tax as recalculated.

3.3.3.2. Additional Current Top-up Tax for purposes of Art. 119 (2) of the ENFORCEMENT DECREE OF THE INTERNATIONAL TAXES ACT

3.3.3.2	This Table does not need to be completed if the MNE Group has a positive amount of Net GloBE Income in the jurisdiction.
3.3.3.2.1	The Filing Constituent Entity shall report the negative amount of Adjusted Covered Taxes for the jurisdiction.
3.3.3.2.2	The Filing Constituent Entity shall report the GloBE Loss for the Jurisdiction.
3.3.3.2.3	The Filing Constituent Entity shall report the Expected Adjusted Covered Taxes for the jurisdiction.
3.3.3.2.4	The Filing Constituent Entity shall report the Additional Current Top-up Tax under Art. 119 (2) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT for the jurisdiction.

3.3.4 QDMTT

3.3.4.1	The Filing Constituent Entity shall complete this column if the QDMTT computes Domestic Excess Profits based on a financial accounting standard other than the financial accounting standard used in preparing the Consolidated Financial Statements of the UPE. The Filing Constituent Entity shall report the Acceptable Financial Accounting Standard permitted by the Authorised Accounting Body in the jurisdiction or the Authorised Financial Accounting Standard adjusted to prevent any Material Competitive Distortions that is used for the computation of Domestic Excess Profits under the QDMTT.
3.3.4.2	The Filing Constituent Entity shall report the amount payable under the QDMTT of the jurisdiction for the Reporting Fiscal Year. This amount shall be provided in the currency reported in 1.2.2.3. If the QDMTT amount payable is determined in local currency, such amount shall be translated to the presentation currency pursuant to the relevant currency translation principles of the Authorised Financial Accounting Standard used to prepare the Consolidated Financial Statements.
3.3.4.3	The Filing Constituent Entity shall report the Minimum Rate applicable for QDMTT purposes, if higher than 15%.
3.3.4.4	The Filing Constituent Entity shall report the basis for the blending of income and taxes for purposes of the ETR computation, if different from the GloBE Rules.

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3.3.4.5	The Filing Constituent Entity shall report the currency being used for purposes of the QDMTT, if different from the CFS presentation currency. If the QDMTT is elected to be applied as a QDMTT Safe Harbour (and the switch-off rule does not apply with respect to the relevant jurisdiction or subgroup), the amounts reported in section 3 shall be reported in the currency used for purposes of the QDMTT.
3.3.4.6	When the QDMTT legislation requires QDMTT computations to be made using the local accounting standard and one or more Constituent Entities in the jurisdiction use a currency other than the local currency as their functional currency, the Filing Constituent Entity can make a Five-year Election to undertake the QDMTT computations using the presentation currency of the Consolidated Financial Statements or the local currency.
3.3.4.7	The Filing Constituent Entity shall report "Yes" if the Substance-based Income Exclusion under Art. 70 (3) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT is also available for QDMTT purposes.
3.3.4.8	The Filing Constituent Entity shall report "Yes" if the de minimis exclusion under Art. 74 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT is also available for QDMTT purposes.
3.4 Top-up Tax allocation and attribution (if any)	
3.4.1 Application of the IIR in respect of this jurisdiction	
3.4.1	This information is only required if a QIIR applies in respect of the relevant Low-Taxed Constituent Entities or members of JV Groups. The information relating to Constituent Entities or members of JV Group does not need to be reported on an entity-by-entity basis if, for those Constituent Entities or members of JV Group: (i) a single Parent Entity applies a QIIR and the Parent's Entity Allocable Share is 100%. In that situation, the Parent Entity's Allocable Share of the Top-up Tax reported in 3.4.1.3.a shall equal the Jurisdictional Top-up Tax reported in 3.3.1.f; or (ii) the Inclusion Ratio of all the Parent Entities required to apply a QIIR is the same with respect to each relevant Constituent Entity or member of JV Group in the jurisdiction.
3.4.1.1.a	The Group Entities that are allocated Top-up Tax are Constituent Entities, MOCEs, Investment Entities, members of JV Groups located in Low-Tax Jurisdictions or Stateless Constituent Entities with an ETR below the Minimum Rate.
3.4.1.1.b	In those situations where Art. 121 (1) 1 or 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT apply, the GloBE Income of each CE (or member of JV Group) shall not be used to allocate the relevant Top-up Tax but alternative allocation factors shall apply, as provided under those Articles and as clarified in this note. In those situations where applies, the GloBE Income of each CE (or member of JV Group) shall be equal to the GloBE Income of those CEs (or members of JV Groups) in the Fiscal Years for which the recalculations as provided in Art. 121 (1) 1 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. In those situations where Art. 121 (1) 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the GloBE Income of each CE (or member of JV Group) shall be reported only for those CEs (or members of JV Groups) that record an Adjusted Covered Taxes amount that is less than zero and less than the GloBE Income or Loss of such CE (or member of JV Group) multiplied by the Minimum Rate and shall be computed as per the following formula: (GloBE Income or Loss x Minimum Rate) - Adjusted Covered Taxes. If both Art. 121 (1) 1 and 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT apply, each of the alternative factors outlined in this note should be reported separately.
3.4.1.1.c	The Top-up Tax of the LTCE (or member of JV Group) is the share of the relevant amount of the Jurisdictional Top-up Tax allocated in proportion to the GloBE Income of the LTCE (or member of JV Group), obtained by multiplying the amount of the Jurisdictional Top-up Tax by the ratio of GloBE Income of the LTCE (or member of JV Group) over the aggregate GloBE Income of all LTCEs (or members of JV Groups). In those situations where Art. 121 (1) 1 or 2 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT apply, the aggregate GloBE Income of all LTCEs (or members of JV Groups) with GloBE Income in the jurisdiction shall not be used for purposes of allocating Top-up Tax. The relevant alternative allocation factors identified in 3.4.1.1.b shall be used instead (see Note 3.4.1.1.b). If Art. 79 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall not complete row 3.4.1.1.b and the Top-up Tax of the LTCE (or member of JV Group) shall be the amount determined in accordance with Art. 79 (6) 2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT (or Art. 137 (6) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT for the revocation year). If an Investment Entity or Insurance Investment Entity is allocated Top-up Tax both under Art. 71 and 79 (6) 2 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT, the Filing Constituent Entity shall complete rows 3.4.1.1.a to 3.4.1.1.c twice with respect to this Investment Entity or Insurance Investment Entity.

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3.4.1.2.a	The Filing Constituent Entity shall report the TIN (or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number) of the Parent Entity.
3.4.1.2.b	The Filing Constituent Entity shall report the jurisdictions where Parent Entities of the MNE Group are required to apply a QIIR in the form of 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard. When Art. 103 (4) of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT applies, the Filing Constituent Entity shall report the jurisdiction that requires the Parent Entity to apply its QIIR.
3.4.1.2.c	The amount of GloBE Income attributable to Ownership Interests held by other owners than the relevant Parent Entity is determined in accordance with Art. 124 of the ENFORCEMENT DECREE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.4.1.3.b	The IIR Offset is the amount of Top-up Tax that is brought into charge under a Qualified IIR by a POPE or Intermediate Parent Entity located in a lower tier of the ownership chain.
3.4.2 Total UTPR Top-up Tax amount in respect of this Jurisdiction	
3.4.2	Table 3.4.2 only needs to be completed in respect of LTCEs for which Art. 73 (3) 1 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT does not apply and members of JV Groups in respect of which the JV Group Top-up Tax is not reduced to zero after the application of Qualified Income Inclusion Rules. If Art. 73 (3) 1 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT applies for all LTCEs, Table 3.4.2 does not need to be completed for any LTCE. If the JV Group Top-up Tax is reduced to zero for all JV Group members of a given JV Group, Table 3.4.2 does not need to be completed for any JV Group member of that JV Group.
3.4.2.1	If no QIIR applies in respect of any LTCE (or member of JV Group) for which the Top-up Tax calculation is made, this table does not need to be filled in on an LTCE (or member of JV Group) basis and the Filing Constituent Entity shall report "all" instead of the TIN of each LTCE (or member of JV Group) or, where a TIN is unavailable, a functional equivalent, such as a business/company registration code/number.
3.4.2.2	When Art. 73 (3) 1 of the ADJUSTMENT OF INTERNATIONAL TAXES ACT does not apply, the Top-up Tax for each LTCE shall be computed by deducting the Top-up Tax payable under the QIIR by the Parent Entity from the Top-up Tax of the LTCE. The Top-up Tax for each member of a JV Group shall be computed by deducting the Top-up Tax payable under the QIIR by The Parent Entity from the UPE's Allocable Share of the Top-up Tax of the JV Member. If no QIIR applies in respect of any LTCE (or member of JV Group) for which the Top-up Tax calculation is made and the table is filled in on a jurisdictional basis, this information does not need to be reported.
3.4.2.3	The Filing Constituent Entity shall report the Total UTPR Top-up Tax Amount in respect of the jurisdiction. The Filing Constituent Entity shall report the sum of all amounts reported in 3.4.2.2 (Top-up Tax taken into account for Art. 73 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT) for each Low-Taxed Constituent Entity and member of a JV Group located in a Low-Tax Jurisdiction as well as for each Stateless Constituent Entity that has an amount reported in 3.4.2.2. If no QIIR applies in respect of any LTCE (or member of JV Group) for which the Top-up Tax calculation is made, the Top-up Tax taken into account for Art. 73 (2) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT is the Jurisdictional Top-up Tax computed.
3.4.3 Attribution of Top-up Tax under the UTPR	
3.4.3.	The Filing Constituent Entity shall complete this table if there is a UTPR Top-up Tax Amount for at least one jurisdiction for the Reporting Fiscal Year or if there is a UTPR Top-up Tax carry-forward reported in column 3.4.3.2.
3.4.3.1	The Filing Constituent Entity shall report the UTPR Jurisdictions of the MNE Group in the form of 2-character alphabetic country code based on the ISO 3166-1 Alpha 2 standard.
3.4.3.2	If the UTPR Top-up Tax Amount allocated to a jurisdiction in a prior Fiscal Year has not yet resulted in an equivalent additional cash tax expense for the Constituent Entities located in that jurisdiction, the amount to be carried forward in accordance with Art. 73 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT shall be reported in 3.4.3.7.
3.4.3.3 and 3.4.3.4 (Total)	If the UTPR Percentage in 3.4.3.5 is zero for a UTPR jurisdiction as a result of the application of Art. 73 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT, the Number of Employees and Tangible Assets of the Constituent Entities located in the jurisdiction are excluded from the total (i.e. denominator of the formula for purposes of the allocation key). This exclusion from the total (and the denominator) does not apply if all UTPR jurisdictions have a UTPR Percentage of zero in the Reporting Fiscal Year (Art. 73 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT).

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3.4.3.3	The Number of Employees allocated to Permanent Establishments (including those of Flow through Entities) shall be taken into account for computing the UTPR Percentage of the jurisdiction where such PEs are located. Further, the Number of Employees of Constituent Entities is subject to two exclusions under Art. 78 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. Firstly, the number of Employees of Investment Entities in the UTPR jurisdiction shall be excluded for purposes of computing a jurisdiction's UTPR percentage. (Art. 78 (2) 2 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) Secondly, in instances where a Flow-through Entity's employees are not allocated to PEs, they shall be allocated to any Constituent Entities that are located in the jurisdiction where the Flow-through Entity was created, irrespective of whether they are the Constituent Entity-owners of the Entity. (Art. 78 (2) 3 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) The Number of Employees employed by a Flow-through Entity that are not otherwise allocated shall be excluded as provided under Art. 78 (2) 4 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.4.3.4	The Net Book Value of Tangible Assets allocated to PEs (including those of Flow-through Entities) shall be taken into account for computing the UTPR Percentage of the jurisdiction where such PEs are located. Further, the Net Book Value of Tangible Assets of Constituent Entities is subject to two exclusions under Art. 78 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT. Firstly, the Net Book Value of Tangible Assets held by Investment Entities in the UTPR jurisdiction shall be excluded for purposes of computing a jurisdiction's UTPR percentage. (Art. 78 (2) 2 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.) Secondly, in instances where a Flow-through Entity's Tangible Assets are not allocated to PEs, they shall be allocated to any Constituent Entities that are located in the jurisdiction where the Flow-through Entity was created, irrespective of whether they are the Constituent Entity-owners of the Entity. (Art. 78 (2) 3 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT) The Net Book Value of the Tangible Assets held by a Flow-through Entity that are not otherwise allocated shall be excluded as provided under Art. 78 (2) 4 of the ENFORCEMENT RULE OF THE ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.4.3.5	The UTPR Percentage is computed in accordance with Art. 73 (4) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT. If there is a UTPR Top-up Tax carry-forward for a UTPR jurisdiction in 3.4.3.2, the UTPR percentage of the jurisdiction shall be zero, unless all UTPR jurisdictions have a UTPR Percentage of zero in the Reporting Fiscal Year. The UTPR Percentage reported in this column shall be the UTPR Percentage computed after the application of Art. 73 (6) of the ADJUSTMENT OF INTERNATIONAL TAXES ACT.
3.4.3.6(Total)	The total UTPR Top-up Tax Amount to be attributed among UTPR Jurisdictions is the sum of each Total UTPR Top-up Tax Amount in respect of each jurisdiction identified in table 3.4.3.
3.4.3.7	The additional cash tax expense incurred by CEs in the UTPR jurisdiction is the amount of tax due under the UTPR in addition to the amount of tax that would otherwise be payable under normal tax rules.
3.4.3.8	The UTPR Top-up tax left to be carried forward is the positive difference between the UTPR Top-up Tax amount attributed to the UTPR jurisdiction for the Reporting Fiscal Year and the additional cash tax expense incurred by CEs in the UTPR jurisdiction reported in 3.4.3.7. When the amount attributed to the UTPR jurisdiction for the Reporting Fiscal Year (3.4.3.6) is zero, the Filing Constituent Entity shall report in column 3.4.3.8 the positive difference between the UTPR Top-up Tax carry-forward from previous Fiscal Years (3.4.3.2) and the additional cash tax expense incurred by Constituent Entities located in the UTPR jurisdiction (3.4.3.7).