



Pillar Two overview for inward and outward investors

Quick reference guide

Key

- ✔ Applicable to the return
- ✘ Not applicable to the return

For example:

GIR ✔ Applicable to the GIR

GIR ✘ Not applicable to the GIR

Terminology

AIUTR: Australian IIR/UTPR Tax Return

CGDMTR: Combined Global and Domestic Minimum Tax Return

DMT: Domestic Minimum Top-up

DMTR: Australian DMT Tax Return

FLN: Foreign lodgment notification

GIR: GloBE Information Return

IIR: Income Inclusion Rule

UTPR: Undertaxed Profits Rule

For ease of lodgment, we have combined the FLN, AIUTR & DMTR into a single combined form, which is the CGDMTR.

Lodgment & payment

Lodgment due date

GIR ✔ **FLN** ✔ **AIUTR** ✔ **DMTR** ✔

- 15 months* (general case)
- 18 months* (first year 'transitional year')

**after the last day of the fiscal year*

Payment due date

GIR ✘ **AIUTR** ✔ **DMTR** ✔

- 15 months* (general case)
- 18 months* (first year 'transitional year')

**after the last day of the fiscal year*

[PCG 2025/4 | Legal database](#) *Global and domestic minimum tax lodgment obligations – transitional approach*

This Practical Compliance Guideline provides the Commissioner of Taxation's practical administrative approach to lodgment obligations and penalties during the transition period.

Penalties & liability

Administrative penalties

GIR ✔ **AIUTR** ✔ **DMTR** ✔

The [penalty](#) for failure to lodge on time is 500 times the base penalty amount as per the *Taxation Administration Act 1953*.

Liable entity

GIR ✘ **AIUTR** ✔ **DMTR** ✔

Legislation sets out which group entity is liable. Generally, the head company of a tax consolidated group is liable for the IIR, DMT, UTPR top-up tax.

When a group entity is liable, it is primarily liable for its individual top-up tax liability, even if a designated local entity (DLE) lodges on its behalf. If the group entity with the liability fails to discharge the debt, all group entities become jointly and severally liable for the liability.

Other information

Interest charges

- [General interest charge](#)
- [Shortfall interest charge](#)

Record keeping requirements

GIR ✓ **AIUTR** ✓ **DMTR** ✓

Records must be kept until the latest of either the:

- end of 8 years after those records were prepared or obtained
- completion of the transactions or acts to which those records relate.

Period of review

GIR ✓ **AIUTR** ✓ **DMTR** ✓

The commencement of the period of review for the AIUTR/DMTR is 4 years from the later of when the GIR or the AIUTR/DMTR is given to the Commissioner.



Inward investors (foreign controlled Australian constituent entities)

Quick reference guide

Group structure

- The UPE is not GloBE located in Australia.
- The UPE has Australian group entity subsidiaries.

Legislation

- [Taxation \(Multinational—Global and Domestic Minimum Tax\) Act 2024](#)
- [Taxation \(Multinational—Global and Domestic Minimum Tax\) Rules 2024](#)

Lodging entity

GIR

Default requirement: Each Australian group entity in an MNE group has an obligation to lodge a GIR.

If lodging in Australia

- An Australian DLE may lodge the GIR on behalf of Australian group entities if each Australian group entity within the MNE group appoints the group entity to be the DLE.
- When a DLE lodges the GIR, the lodgment obligations of all group entities in Australia are deemed to be met.
- If no DLE is appointed, each Australian group entity within the MNE group must lodge the GIR individually in Australia.

If lodging with another tax authority (not the ATO)

- A UPE or designated filing entity (DFE) may lodge the GIR in a foreign jurisdiction that has a Qualifying Competent Authority Agreement (QCAA) with Australia.
- To satisfy Australian lodgment obligations:
 - the GIR must be lodged on time in the foreign jurisdiction
 - each Australian group entity or a nominated Australian DLE must notify the Commissioner that the GIR has been lodged by the GIR filing due date, using the FLN.
- If the UPE or DFE do not lodge, then every group entity located in Australia will need to lodge a GIR separately. This means each Australian group entity will need to lodge the GIR with the ATO or nominate an Australian DLE to lodge on their behalf.
- If the GIR is lodged in a foreign jurisdiction that does not have a QCAA with Australia, each Australian group entity or a nominated Australian DLE must lodge the GIR locally in Australia.

AIUTR & DMTR

Lodging entity in Australia

Generally, each Australian group entity within an MNE group must give the Commissioner a:

- AIUTR for the fiscal year if it has an Australian IIR/UTPR tax amount for the fiscal year (including a nil amount)
- DMTR for the fiscal year if it has an Australian DMT tax amount for the fiscal year (including a nil amount).

- The following streamlined lodgment processes may be available to a group to facilitate easier lodgment:
- Group entities may not need to lodge an AUITR and/or a DMTR if they satisfy the lodgment exemption criteria in the Legislative Instrument – refer to [ATO website guidance on the legislative instrument](#).
- For example, if the group entity is part of a tax consolidated group, then the subsidiaries of the tax consolidated group are exempt from lodging a DMTR. Instead, the head company of the tax consolidated group is required to lodge or may appoint a DLE to lodge on its behalf.
- A DLE may lodge the AUITR and/or DMTR on behalf of an MNE group if each group entity with a lodgment obligation within the group appoints the DLE.
- If no DLE is appointed, each group entity with an AUITR and/or DMTR lodgment obligation must lodge individually.
- The FLN (if GIR is lodged overseas), DMTR, and AUITR (if not exempted under the LI) will be expected to be lodged in the CGDMTR and this can be lodged by the DLE.



Outward investors (Australian UPEs lodging in Australia) Quick reference guide

Group structure

- The Australian UPE is GloBE located in Australia, and the Australian UPE will lodge the GIR in Australia.
- The Australian UPE has group entities located outside Australia.

Note: If the GIR is lodged with another tax authority, refer to the above information on page 3 in respect of the GIR for Inward Investors which would be equally applicable in this case.

Legislation

- [Taxation \(Multinational—Global and Domestic Minimum Tax\) Act 2024](#)
- [Taxation \(Multinational—Global and Domestic Minimum Tax\) Rules 2024](#)

Lodging entity

Lodging entity in Australia

GIR

Default requirement: Each Australian group entity in an MNE group has an obligation to lodge a GIR.

- We generally expect that groups headquartered in Australia will lodge the GIR with the ATO.
- In this case, an Australian DLE may lodge the GIR on behalf of an MNE group if each group entity within the group appoints the DLE.
- When an Australian DLE lodges the GIR, the lodgment obligations of all group entities located in Australia are deemed to be met.
- If no DLE is appointed, each Australian group entity within the MNE group must lodge the GIR individually in Australia.

AIUTR & DMTR

- Generally, each Australian group entity of an MNE group must give the Commissioner an AIUTR and/or DMTR for the fiscal year if it has an Australian IIR/UTPR tax amount and/or an Australian DMT tax amount for the fiscal year, including a nil amount.
- Group entities may not need to lodge an AIUTR and/or a DMTR if they satisfy the lodgment exemption criteria in the Legislative Instrument – refer to [ATO website guidance on the legislative instrument](#).
- For example, if the group entity is part of a tax consolidated group, then the subsidiaries of the tax consolidated group are exempt from lodging a DMTR. Instead, the head company of the tax consolidated group is required to lodge or may appoint a DLE to lodge on its behalf.
- All groups would be expected to have at least one entity required to lodge an AIUTR and DMTR because the group is headquartered in Australia (even if a nil amount of Australian DMT top-up tax, Australian IIR top-up tax or Australian UTPR top-up tax).
- A DLE may lodge the AIUTR and DMTR on behalf of an MNE group if each group entity with a lodgment obligation within the group appoints the DLE.

- If no DLE is appointed, each group entity with an AIUTR and/or DMTR lodgment obligation must lodged individually.
- The DMTR and/or AIUTR will be expected to be lodged in the CGDMTR and this can be lodged by the DLE.