Registration For Pillar II in the UAE

The EmaraTax portal has introduced a registration feature for the payment of the Qualified Domestic Minimum Top-up Tax (QDMTT) under the Pillar II rules

We have previously covered the applicability of the Pillar II rules to multinational enterprise (MNE) groups in our article

1 Select how the group companies will report

Domestic Designated Filing Entity (DDFE)

A DDFE is appointed where there are several companies in the UAE and one of them will represent the entire group

That company files the return, pays the QDMTT and deals with the UAE Federal Tax Authority (FTA) on behalf of all the companies in the group

OR

Individual Entity

Applies where no DDFE has been appointed, or where the group has only one company in the UAE

In this case, each company fulfills its own obligations independently

When registering through a DDFE, the responsible person will need to gather information on all the group's companies in the UAE and obtain authorization from them. When registering as an Individual Entity, the company registers and reports on its own. It is important to choose the right strategy from the outset.

2 Documents for registration

- Certificates of incorporation and tax registration of the ultimate parent entity and of the applicant company, if they are established outside the UAE
- A chart of the group, including all companies both within and outside the UAE
- Authorization letters for the appointment of the DDFE (if not completed via EmaraTax)
- An authorization letter for the appointment of a Designated Local Entity to file the Global Information Return (if applicable and not completed via EmaraTax)

3 Deadlines

Registration on EmaraTax:
Deadline has not yet been set

However, a penalty has been established for late registration:
10 000 AED

QDMTT return for 2025
30 June 2027 (for a calendar FY)

Subsequent QDMTT returns
15 months after the year-end

WE CAN HELP YOU

- **To support your registration for Pillar II in the UAE**
- **To check whether reliefs and exclusions are available**
- **To develop a position in complex cases**
- **To calculate QDMTT and prepare the returns**

Irina Fadeeva

Partner
ifadeeva@globalaimcons.com

Vsevolod Bude

Senior Manager
vbude@globalaimcons.com

Ilia Morozov

Ilia Morozov
imorozov@globalaimcons.com

globalaimcons.com