**UNDERTAXED PROFITS RULE (UTPR)**

**TOP – UP TAX DUE RETURN**

**Fiscal Year Ending ...../...../2024**

|  |  |  |
| --- | --- | --- |
| **PART 1** |  | Name of MNE Group: |
|  |  | Name of Local Group: |

|  |  |  |  |
| --- | --- | --- | --- |
| **PART 2** |  | Name of Constituent Entity: | TIN: |
|  |  | Member of Joint Venture Group: | TIN: |

|  |  |
| --- | --- |
| **PART 3** | Total top-up tax of the Group in Cyprus (T): € ....................................................................................... |

|  |  |  |
| --- | --- | --- |
| **PART 4** | (i) Qualified Income of Constituent Entity (A1):  | € ............................................................................ |
|  | or |
|  | Qualified Income of member of Joint Venture Group (A2):  | € ............................................................................ |
|  | (ii) Total Qualified Income of Constituent Entities of the Group (B1):  | € ........................................ |
|  | or |
|  | Total Qualified Income of Members of the Joint Venture Group (B2):  | € ........................................ |

|  |  |  |
| --- | --- | --- |
| **PART 5** | (i) Top-up Tax attributed to the Constituent Entity (Tx (A1/B1)):  | € ........................... |
|  | or |
|  | (ii) Top-up Tax attributed to the Member of Joint Venture Group (T x ((A2/B2)):  | € ........................... |

**PART 6. DECLARATION**

|  |  |  |  |
| --- | --- | --- | --- |
| **I** |  | with T.I.N. |  |

The manager/secretary/director of:

|  |  |
| --- | --- |
| Constituentt Entity Name |  |
| or |  |
| Member of Joint Venture Group |  |

having full knowledge of the consequences of the Law for Ensuring a Global Minimum Level of Taxation for Multinational Enterprise Groups and Large Scale Domestic Groups in the Union Law (N. 151(I)/2024) and the Assessment and Collection of Taxes Law N.4/1978, declare that all the information included in this declaration is in accordance with the Law Ensuring a Global Minimum Level of Taxation for Multinational Enterprise Groups and Large Scale Domestic Groups in the Union (N. 151(I)/2024), Articles 1-11, 13-44, 46-51, 53-59, as applicable.

|  |  |  |  |
| --- | --- | --- | --- |
| **Signature:** |  | **Date:** |  |

**PART 7. FILING OBLIGATIONS, OFFENCES AND FINES**

1. In accordance with Article 48(1) of the Law for Ensuring a Global Minimum Level of Taxation for Multinational Enterprise Groups and Large Scale Domestic Groups in the Union (N. 151(I)/2024), the tax liability calculated and allocated under the provisions of this Law shall be carried out on the basis of the Income Inclusion Rule Top-Up tax Due Return, as it is submitted for each fiscal year either in the Republic or in another jurisdiction in which the said liability is due.
2. In accordance with Article 48(2) of the Law for Ensuring a Global Minimum Level of Taxation for Multinational Enterprise Groups and Large Scale Domestic Groups in the Union (N. 151(I)/2024), the Income Inclusion rule Top-Up tax Due Return, shall be submitted by the constituent entities or members of the joint ventures groups, from which an amount of top-up tax is due as a result of the application of a qualified IIR within thirty (30) days as from the deadline for submitting the Top-Up Tax Information Return. (as defined in subsection (7) of article 45 and in article 57).
3. In accordance with Article 48(3) of the Law for Ensuring a Global Minimum Level of Taxation for Multinational Enterprise Groups and Large Scale Domestic Groups in the Union (N. 151(I)/2024), any liability arising in accordance with the provisions of this Law due to the application of a qualified IIR shall be payable within thirty (30) days from the deadline for submitting the Top-Up Tax Information Return.
4. In accordance with Article 50 of the Law for Ensuring a Global Minimum Level of Taxation for Multinational Enterprise Groups and Large Scale Domestic Groups in the Union (N. 151(I)/2024), a revised IIR Top-Up tax return may be submitted the later of within 30 days from the date of submission of the revised TTIR, the due date for submission of the TTIR.

**OFFENCES AND FINES**

Offences and fines apply in accordance with Articles 51 and 52 of the Law for Ensuring a Global Minimum Level of Taxation for Multinational Enterprise Groups and Large Scale Domestic Groups in the Union (N. 151(I)/2024).