



DMTT

RETURNS **GUIDE**

STEP *by* STEP

DEPARTMENT OF INLAND REVENUE



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DEPARTMENT OF
INLAND REVENUE
Central Revenue Administration

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Glossary

Abbreviation	Full wording
BIN	Bahamas Identification Number
BSD	Bahamian Dollar
CbCR	Country-by-Country Reporting
CE	Constituent Entity
CEs	Constituent Entities
CFS	Consolidated Financial Statements
DIR	Department of Inland Revenue
DLE	Designated Local Entity
DMTT	Domestic Minimum Top-up Tax
DTA	Deferred Tax Asset
ETR	Effective Tax Rate
FANIL	Financial Accounting Net Income or Loss
FAS	Financial Accounting Standard
GIR	GloBE Information Return
GloBE	Global Anti-Base Erosion
ID	Identification
JV	Joint Venture
MNE	Multinational Enterprise
MOCE	Minority-Owned Constituent Entity
NMCE	Non-Material Constituent Entity
OCI	Other Comprehensive Income
OTP	One-Time Passcode
PE	Permanent Establishment
SBIE	Substance-based Income Exclusion
TIN	Tax Identification Number

Introduction

The DMTT Returns module enables taxpayers and authorized Tax Representatives to file, review, and manage DMTT returns for the applicable fiscal year.

The return filing process includes validating return information, uploading supporting documents, and submitting the return for processing.

Purpose of This Guide

This guide provides step-by-step instructions for taxpayers and Tax Representatives to file and manage DMTT returns within the DMTT Application. It covers the end-to-end return lifecycle, including return initiation, data entry, document uploads, consent and One Time Passcode (OTP) validation, submission, and return processing by DIR officers and supervisors.

Prerequisites

- The taxpayer has valid credentials (i.e. a Bahamas Identification Number (BIN)) and access to the DMTT Application.
- The applicable return period is open for filing.
- Required templates, forms, and business rules are configured in the system.
- The Tax Representative, if applicable, is registered in the system with a valid BIN and contact details.
- All required return information and supporting documents are available before beginning the filing process.

New Return

- Access to One Tax Bahamas portal
- Visit the official One Tax Bahamas portal: <https://onetaxbahamas.gov.bs>.
- Navigate to the Quick Links panel and select DMTT Dashboard
- Sign in to your DMTT account using your BIN ID and password
- From the homepage, click Returns from the main navigation menu
- Click on “Let’s start DMTT return” from the return dashboard.

Note: Users can access the DMTT Return either through the **DMTT Dashboard (Quick Links)** or directly by logging in with their BIN ID & password, from the **Profile Summary page** by selecting the

DMTT module---> Go to DMTT application--->Returns

ONE TAXI BAHAMAS

Search

Session Timer: 19:37

Accessibility Options

Adison AND sons
BIN #XXXXXXXX484
Entity Resident

Dashboard DMTT Registration **Returns** Payments & Funds

Home > Returns > Initiate Return

DMTT Returns

Returns

Start DMTT Return

Click below to initiate a new DMTT Return filing for the applicable period.

Let's Start

Start Amendment Return

Click below to initiate an amendment to a previously filed DMTT Return.

Let's Start

In the Initiate New Return window, select the applicable DMTT UIN from the dropdown list.

Initiate New Return

DMTT UIN *

47869124 - Honeywell Co limited ▼

Fiscal Year *

2024/01/01-2024/12/31 ▼

Cancel **Submit**

Introductory Questions

This information is pre-populated from the DMTT Registration for the MNE Group. Review all the populated information and select the checkbox to confirm that the registration information is up to date. (If user wants to review/check the DMTT Registration details, they can click View Registration Information link that is available in the confirmation).

Introductory Questions	1 Period covered by DMTT Return	2 MNE Group General Accounting Information	3 Ultimate Parent Entity details	4 Election not to treat an Entity as an Excluded Entity (Article 15.3 - 5-year election)	...	14 Verification
Introductory Questions Name of MNE Group * ⓘ Honeywell Co limited DMTT UIN * ⓘ 47869124 Fiscal Year of Filing * ⓘ 2024/01/01 - 2024/12/31 ☒ * Confirm that the Registration Form information is up-to-date (View Registration Information). ⓘ Name of the Designated Local Entity * ⓘ Adison ANd sons BIN * ⓘ 1508237484 Entity Type * ⓘ Ultimate Parent Entity						

Registered Address ⓘ	
Address Line 1 * Galaxy Apt	Address Line 2 Apartment, suite, unit, building, floor
Address Line 3 Landmark, district, or additional instructions	Country * Bahamas 
State Berry Islands	City The Bahamas
Name of UPE for Fiscal Year * ⓘ Adison ANd sons	
Jurisdiction where UPE is located * ⓘ The Bahamas	
TIN of UPE * ⓘ 1508237484	
Name of Designated Filing Entity for GIR filing purposes * ⓘ Adison ANd sons	
Jurisdiction where the Designated Filing Entity is located * ⓘ The Bahamas	

TIN of Designated Filing Entity for GIR filing purposes * ⓘ

1508237484

Exchange of Information with Jurisdiction where the Designated Filing Entity is located *

No

Upload XML File

No file chosen

[Upload Document](#)

[Attach file](#)

[Back](#) [Next](#)

The following fields are editable in the Introductory Questions section:

- Name of MNE Group
- Name of the Designated Local Entity
- Entity Type
- Name of UPE for Fiscal Year
- Jurisdiction where UPE is located
- TIN/BIN of UPE
- Name of Designated Filing Entity for GIR filing purposes

Section 1: Period covered by DMTT return

Step 1: Review the Start Date of the Reporting Fiscal Year displayed on the screen

Step 2: Review the End Date of the Reporting Fiscal Year displayed on the screen

Step 3: Click **Next** to continue to the **MNE Group General Accounting Information** section.

New ReturnSave Form

• Introductory Questions

1 Period covered by DMTT Return

2 MNE Group General Accounting Information

3 Ultimate Parent Entity details

4 Election not to treat an Entity as an Excluded Entity (Article 15.3 - 5-year election)

...

14 Verification

Period covered by DMTT Return

Start Date of the Reporting Fiscal Year * ⓘ
2024/01/01

End Date of the Reporting Fiscal Year * ⓘ
2024/12/31

Section 2: MNE Group General Accounting Information

Step 1: Select the applicable Consolidated Financial Statements (CFS) type for the Ultimate Parent Entity (UPE).

Step 2: Select the Financial Accounting Standard (FAS) used for the UPE's CFS and verify the displayed value.

Step 3: Select the Presentation Currency used for the UPE's CFS.

• Introductory Questions

1 Period covered by DMTT Return

2 MNE Group General Accounting Information

3 Ultimate Parent Entity details

4 Election not to treat an Entity as an Excluded Entity (Article 15.3 - 5-year election)

...

14 Verification

MNE Group General Accounting Information

Select the relevant type of Consolidated Financial Statements (CFS) of the UPE *

☐ (a) The financial statements prepared by an Entity in accordance with an Acceptable Financial Accounting Standard, in which the assets, liabilities, income, expenses and cash flows of that Entity and the Entities in which it has a Controlling Interest are presented as those of a single economic unit.

☒ (b) The financial statements of a Main Entity and its Permanent Establishments prepared in accordance with an Acceptable Financial Accounting Standard.

☐ (c) Where the UPE has financial statements under (a) or (b) above that are not prepared in accordance with an Acceptable Financial Accounting Standard, the financial statements that have been prepared subject to adjustments to prevent any Material Competitive Distortions.

☐ (d) The financial standards under the deemed consolidation rule.

Financial Accounting Standard (FAS) used for the CFS of the UPE *

IFRS

Presentation currency used for the CFS of the UPE *

AUD (Australian Dollar)

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Section 3: Ultimate Parent Entity details

Step 1: Review the auto-populated Name of the Ultimate Parent Entity (UPE), Jurisdiction of the UPE, and TIN of the UPE (Note: If the UPE is not located in The Bahamas this field should be optional i.e. this field shall only be required if the UPE is in The Bahamas).

Step 2: Select the applicable Status of the UPE for GloBE purposes from the dropdown list:

- Constituent Entity
- Flow-Through Entity - Tax Transparent Flow-Through Entity - Reverse Hybrid Hybrid Entity
- Main Entity
- Investment Entity
- Insurance Investment Entity
- Excluded Entity

This field is mandatory if the UPE is located in The Bahamas. If more than one option is relevant, select all relevant options.

Status of UPE

The user is restricted from selecting the following combinations from the drop-down tick box options:

- An entity cannot be both a Flow-Through Entity – Tax Transparent and Flow-Through Entity – Reverse Hybrid; and
- An entity cannot be both an Excluded Entity and Constituent Entity.

Type of Excluded Entity (Status of UPE is Excluded Entity and jurisdiction of UPE is The Bahamas)

If the UPE is an Excluded Entity, the Designated Local Entity shall report whether the UPE is:

- Governmental Entity
- International Organisation
- Non-profit Organisation
- Pension Fund
- Investment Fund
- Real Estate Investment Vehicle

Note: This '**Status of UPE**' disclosure is only **required** if the jurisdiction of UPE is The Bahamas.

New Return

Save Form

• Introductory Questions

1 Period covered by DMTT Return

2 MNE Group General Accounting Information

3 Ultimate Parent Entity details

4 Election not to treat an Entity as an Excluded Entity (Article 15.3 - 5-year election)

...

14 Verification

Ultimate Parent Entity details

Name of the UPE * ⓘ

Adison AND sons

Jurisdiction of the UPE * ⓘ

The Bahamas

TIN of the UPE * ⓘ

1508237484

Status of UPE for GloBE purposes (if UPE is in The Bahamas) * ⓘ

Constituent Entity, Hybrid Entity, Main Entity

Section 4: Election not to treat entity as excluded entity (Article 1.5.3-5-year election)

Select Yes if you are making an election not to treat an entity located in The Bahamas as an Excluded Entity. Otherwise, select **No** and proceed to the next section.

On selecting Yes, the name of the entity will display only if there is an excluded entity as part of DMTT registration. **Step 1: Name of Entity** for which the election is made dropdown, select the applicable entity. **Step 2:** Verify that the **BIN of Entity** for which the election is made is automatically populated and correct. If any issues arise, review the DMTT Registration form to confirm that the information therein is accurate. **Step 3:** Enter or select the **Election Year**, which represents the start year for which the election applies. The Election Year cannot be before 01 January 2024 and must relate to a year for which a DMTT Return is required. **Step 4:** If applicable, enter the **Revocation Year**. This represents the fiscal year in which the election is revoked. The Revocation Year cannot be earlier than the reporting fiscal year and must be at least five years after the Election Year.

To add another Excluded Entity, click Add Another Excluded Entity and repeat the above step

Election not to treat an Entity as an Excluded Entity (Article 1.5.3 – 5-year election)

Not treating an Entity located in The Bahamas as an Excluded Entity election (Article 1.5.3) *

☒ Yes

☐ No

Excluded Entity 1

Remove

Name of Entity for which the election is made *

Amelia Castro Ltd (1126470004)

BIN of Entity for which the election is made *

1126470004

Election Year *

2024/01/01

Revocation Year

2031/01/01

Section 5: Identifying the Subgroups in The Bahamas

Step 1: Select the **Type of Subgroup** from the dropdown list

Constituent Entities

Minority-Owned Subgroup

Standalone MOCEs

Investment Entities

JV Group

Stateless Constituent Entity

Step 2: Review the auto-generated **Subgroup Identifier** assigned by the system. A unique identifier is automatically generated by the system to identify each Subgroup requiring a separate DMTT computation.

Step 3: From the **List of CEs in Subgroup**, select all Constituent Entities/JVs belonging to each Subgroup.

Step 4: Indicate whether there have been any **Changes in the Subgroup from the Previous Financial Year**.

Step 5: Enter the **Accounting Standard of the Subgroup** if it differs from the Accounting Standard of the Ultimate Parent Entity (UPE). If there is no difference, disclose Not Applicable or N/A.

Step 6: Select the **Currency Used for DMTT Computation** for the subgroup.

Identifying Subgroups in the Bahamas

Please be advised that any changes to Subgroup details (Section 5) will impact Sections 6 to 10. You will be required to re-complete these sections for all subgroups. Kindly ensure that information disclosed is correct before proceeding with Sections 6 to 10.

Subgroup 1Remove

Type of Subgroup * ⓘ
JV Group

Subgroup Identifier ⓘ
SG-001

List of CEs in Subgroup * ⓘ
1126470004 - Amelia Castro Ltd, 1103666253 - Paramount Multinational Group

Changes in the subgroup from previous Financial Year * ⓘ
No

Accounting standard of Subgroup if different from accounting standard of the UPE * ⓘ
IFRS

Currency used for DMTT computation * ⓘ
AUD (Australian Dollar)

Subgroup 2

Remove

Type of Subgroup ⓘ
Standalone MOCEs

Subgroup Identifier ⓘ
SG-002

List of CEs in Subgroup ⓘ
1508237484 - Adison ANd sons,1620886376 - Gilberto Ltd

Changes in the subgroup from previous Financial Year ⓘ
No

Accounting standard of Subgroup if different from accounting standard of the UPE ⓘ
IFRS

Currency used for DMTT computation ⓘ
AUD (Australian Dollar)

+ Add Subgroup

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Section 6: Safe Harbours elected

Step 1: Any Safe Harbour/De Minimis elected: Select 'Yes' if the Subgroup avails of any of the following:

De minimis Exclusion
Transitional CbCR Safe Harbour

Permanent Safe Harbour

Step 2: Choose which Safe Harbour / De Minimis is elected for: Select the specific Safe Harbour or De Minimis election to be applied for The Bahamas for the Subgroup.

Single select from dropdown options provided:

GIR1201 – De minimis Exclusion
GIR1203 – Transitional CbCR Safe Harbour – De minimis test
GIR1204 – Transitional CbCR Safe Harbour – ETR test
GIR1205 – Transitional CbCR Safe Harbour – Routine profit test

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Safe Harbours elected

1 Subgroup SG-001 JV Group 2 Subgroup SG-002 Standalone MOCs

1126470004 - Amelia Castro Ltd 1103666253 - Paramount Multinational Group

Any Safe Harbour/De Minimis elected? * 1

Yes

Choose which Safe Harbour / De Minimis is elected for * 1

Select

Safe Harbours elected

GIR1201 - De Minimis Exclusion

GIR1203 - Transitional CbCR Safe Harbour - De Minimis test

GIR1204 - Transitional CbCR Safe Harbour - ETR test

GIR1205 - Transitional CbCR Safe Harbour - Routine profit test

GIR1207 - Permanent Safe Harbour - De Minimis test

GIR1208 - Permanent Safe Harbour - ETR test

Select

Section 6.1: Permanent Safe Harbour – Simplified Calculation for Non-Material Constituent Entities (NMCEs)

This section is displayed **only when a Permanent Safe Harbour option (GIR1207, GIR1208, or GIR1209)** is selected in the Safe Harbour section for the Subgroup.

Step 1: Review the total revenue of all Non-Material Constituent Entities (NMCEs) for the Reporting Fiscal Year.

Step 2: Enter the **Total Revenue of all NMCEs (Reporting Fiscal Year)**.

Step 3: If applicable, enter the **Total Revenue of all NMCEs (1st Preceding Fiscal Year)**.

Step 4: If applicable, enter the **Total Revenue of all NMCEs (2nd Preceding Fiscal Year)**.

Step 5: Enter or review the **Average Revenue of all NMCEs across the three Fiscal Years**.

Step 6: If the selected Safe Harbour is **Permanent Safe Harbour – ETR Test (GIR1208)**, enter the **Aggregate Simplified Tax of all NMCEs (Reporting Fiscal Year)**.

6.1. Permanent Safe Harbour: Simplified Calculation for Non-material Constituent Entities

Total Revenue of all NMCEs (Reporting Fiscal Year) ⓘ

Total Revenue of all NMCEs (1st preceding Fiscal Year) ⓘ

Total Revenue of all NMCEs (2nd preceding Fiscal Year) ⓘ

Total Revenue of all NMCEs (Average of the three Fiscal Years) ⓘ

Section 6.2: Transitional CbCR Safe Harbour

This section is displayed **only when a Transitional CbCR Safe Harbour option (GIR1203, GIR1204, or GIR1205)** is selected in the **Safe Harbour / De Minimis Election** section.

Step 1: If **GIR1203 – Transitional CbCR Safe Harbour (De Minimis Test)** is selected, enter the **Total Revenue** for the jurisdiction for the Reporting Fiscal Year.

Step 2: Enter the **Profit (Loss) Before Income Tax** for the jurisdiction for the Reporting Fiscal Year.

Any Safe Harbour/De Minimis elected? * ⓘ

Yes

Choose which Safe Harbour / De Minimis is elected for * ⓘ

GIR1203 – Transitional CbCR Safe Harbour – De Minimis test

6.2. Transitional CbCR Safe Harbour

Total Revenue * ⓘ

0

Profit/(Loss) before Income Tax * ⓘ

0

Step 3: If GIR1204 – Transitional CbCR Safe Harbour (ETR Test) is selected, Report the **Simplified Covered Taxes of the relevant Constituent Entities or members of JV Groups, as defined in the Safe Harbours and Penalty Relief document, for the Reporting Fiscal Year.**

Any Safe Harbour/De Minimis elected? * ⓘ

Yes

Choose which Safe Harbour / De Minimis is elected for * ⓘ

GIR1204 – Transitional CbCR Safe Harbour – ETR test

6.2. Transitional CbCR Safe Harbour

Profit/(Loss) before Income Tax * ⓘ

0

Simplified Covered Taxes * ⓘ

0

Step 4: If GIR1205 – Transitional CbCR Safe Harbour (Routine Profit Test) is selected, the **SBIE Section (Section 9.2) must also be completed.**

Any Safe Harbour/De Minimis elected? * ⓘ

Yes

Choose which Safe Harbour / De Minimis is elected for * ⓘ

GIR1205 – Transitional CbCR Safe Harbour – Routine profit test

6.2. Transitional CbCR Safe Harbour

Profit/(Loss) before Income Tax * ⓘ

0

Section 6.3: Election for De Minimis exclusion

This section should come up only if the safe harbour selected is GIR 1201 or GIR 1207, 1208 or 1209 for the Subgroup.

Step 1: Select **Yes** or **No** for **Election to apply the De Minimis Exclusion for the Reporting Fiscal Year**.

Step 2: Select **Yes** or **No** for **Election for Simplified Calculations for Non-Material Constituent Entities (NMCEs)**.

Step 3: Enter the **Revenue (Financial Accounts) for the Reporting Fiscal Year**.

Step 4: Enter the **Revenue (Financial Accounts) for the 1st Preceding Fiscal Year**, if applicable.

Step 5: Enter the **Revenue (Financial Accounts) for the 2nd Preceding Fiscal Year**, if applicable.

6.3. Election for De Minimis exclusion

Election to apply the De Minimis exclusion for the Reporting Fiscal Year * ⓘ

Yes

Election for Simplified Calculations for Non-material Constituent Entities - Constituent Entities that are not NMCEs * ⓘ

Yes

Revenue (Financial Accounts) for Reporting Fiscal Year * ⓘ

100,000

Revenue (Financial Accounts) - 1st preceding Fiscal Year (if applicable) * ⓘ

200,000

Revenue (Financial Accounts) - 2nd preceding Fiscal Year (if applicable) * ⓘ

300,000

Average of Revenue (Financial Accounts) - for the three Fiscal Years

200,000

Step 7: Enter the **GloBE Revenue for the Reporting Fiscal Year**.

Step 8: Enter the **GloBE Revenue for the 1st Preceding Fiscal Year**, if applicable.

Step 9: Enter the **GloBE Revenue for the 2nd Preceding Fiscal Year**, if applicable.

Step 10: Review the system-generated **Average GloBE Revenue for the Three Fiscal Years**.

GloBE Revenue (Financial Accounts) – for Reporting Fiscal Year * ⓘ
150,000
GloBE Revenue (Financial Accounts) – 1st preceding Fiscal Year (if applicable) * ⓘ
260,000
GloBE Revenue (Financial Accounts) – 2nd preceding Fiscal Year (if applicable) * ⓘ
40,000
Average of GloBE Revenue (Financial Accounts) for the three Fiscal Years
150,000

Step 11: Enter the **Financial Accounting Net Income (or Loss)** for the Reporting Fiscal Year.

Step 12: Enter the **Financial Accounting Net Income (or Loss)** for the 1st Preceding Fiscal Year, if applicable.

Step 13: Enter the **Financial Accounting Net Income (or Loss)** for the 2nd Preceding Fiscal Year, if applicable.

Step 14: Review the system-generated **Average Financial Accounting Net Income (or Loss)** for

Financial Accounting Net Income (or Loss) for Reporting Fiscal Year * ⓘ
800,000
Financial Accounting Net Income (or Loss) – 1st preceding Fiscal Year (if applicable) * ⓘ
200,000
Financial Accounting Net Income (or Loss) – 2nd preceding Fiscal Year (if applicable) * ⓘ
100,000
Average Financial Accounting Net Income (or Loss) for the three Fiscal Years
366,666.67

Step 15: Enter the **GloBE Income (or Loss)** for the Reporting Fiscal Year.

Step 16: Enter the **GloBE Income (or Loss)** for the 1st Preceding Fiscal Year, if applicable.

Step 17: Enter the **GloBE Income (or Loss)** for the 2nd Preceding Fiscal Year, if applicable.

Step 18: Review the system-generated **Average GloBE Income (or Loss)** for the Three Fiscal Years.

Step 19: Verify all entered information and click **Next** to proceed.

GloBE Income (or Loss) for Reporting Fiscal Year * ⓘ	50,000
GloBE Income (or Loss) - 1st preceding Fiscal Year (if applicable) * ⓘ	250,000
GloBE Income (or Loss) - 2nd preceding Fiscal Year (if applicable) * ⓘ	350,000
Average GloBE Income (or Loss) for the three Fiscal Years	216,666.67

Section 6.4: Permanent Safe Harbour - Additional Current Top-Up Tax Computation

This section is displayed only if GIR1207, GIR1208, or GIR1209 (Permanent Safe Harbour) is selected.

Step 1: Enter the **Additional Current Top-Up Tax** due for the reporting fiscal year, if applicable.

6.4. Permanent Safe Harbour - Additional Current Top Up Tax Computation ^	
Additional Current Top-up Tax * ⓘ	0
DMTT (including additional current top-up tax) * ⓘ	0

Section 7: Elections for the Subgroup Identified Above

This section is completed separately for each Subgroup identified in Section 5 and is required only if a Safe Harbour was not elected in Section 6 for that Subgroup.

Step 1: Select **Yes** or **No** for **Aggregate Asset Gain Election (Article 3.2.6)**.

Step 2: Select **Yes** or **No** for **Immaterial Decrease in Covered Taxes Election (Article 4.6.1)**.

Step 3: Select **Yes** or **No** for **Election Not to Apply the Substance-Based Income Exclusion (SBIE)**

If Yes is selected, section 9.2 of the return is not applicable.

Step 4: Select **Yes** or **No** for **Negative Tax Expense Carry-Forward (Article 4.1.5)**.

Elections for the Subgroup identified above

1 Subgroup SG-001
JV Group

2 Subgroup SG-002
Standalone MOCs

1126470004 - Amelia Castro Ltd

1103666253 - Paramount Multinational Group

Annual Elections

Aggregate asset gain election (Article 3.2.6) * ⓘ
No

Immaterial decrease in Covered Taxes election (Article 4.6.1) * ⓘ
No

Election not to apply the Substance-based Income Exclusion (Article 5.3.1) * ⓘ
Yes

Negative Tax Expense Carry-forward (Article 4.1.5) * ⓘ
Yes

Step 5: Select **Yes** or **No** for **Equity Investment Inclusion Election (Article 3.2.1(c))**.

Step 6: If selected **Yes**, enter:

Election Year

Revocation Year (if applicable)

Inclusion of Equity Gain or Loss

Opening Balance of Qualified Ownership Interest

Additions to Qualified Ownership Interest

Reductions to Qualified Ownership Interest

Five-year Elections

Equity Investment Inclusion Election (Article 3.2.1(c)) * ⓘ

Yes

Election Year * ⓘ

2026/01/01

Revocation Year ⓘ

2031/01/01

Inclusion of equity gain or loss with respect to an Equity Investment Inclusion Election * ⓘ

100,000

Balance of the owner's investment in a Qualified Ownership Interest from prior years * ⓘ

30,000

Additions to the owner's investment in a Qualified Ownership Interest * ⓘ

20,000

Reductions to the owner's investment in a Qualified Ownership Interest * ⓘ

10,000

Outstanding balance of the owner's investment in a Qualified Ownership Interest ⓘ

40,000

Step 8: Select **Yes** or **No** for **Stock-Based Compensation Election (Article 3.2.2)**.

Step 9: If selected **Yes**, enter:

Election Year

Revocation Year (if applicable)

Step 10: Select **Yes** or **No** for **Realisation Principle Election (Article 3.2.5)**.

Step 11: If selected **Yes**, enter:

Election Year

Stock-based compensation election (Article 3.2.2) * ⓘ

Yes

Election Year * ⓘ

2026/01/01

Revocation Year ⓘ

2031/01/01

Realisation principle election (Article 3.2.5) * ⓘ

Yes

Election Year * ⓘ

2026/01/01

Revocation Year ⓘ

2031/01/01

Step 12: Select **Yes** or **No** for **GloBE Loss Election (Article 4.5.1)**.

Step 13: If selected **Yes**, enter:
Election Year

Step 14: Select **Yes** or **No** for Transitional Simplified Jurisdictional Reporting Framework.

*If yes is selected, **Section 8** is not re-*

Other Elections	
GloBE Loss Election (Article 4.5.1) *	
Yes	
Election Year *	
2026/01/01	
Revocation Year	
2031/01/01	
Does the MNE Group elect to apply the transitional simplified jurisdictional reporting framework? (Tick 'yes' only if no Top-up tax arises in the Bahamas and the MNE Group wishes to elect for the transitional simplified jurisdictional reporting framework.)	
No	

Section 8: Computation for constituent entity/ JV

This section is completed **for each CE/JV within each Subgroup** identified in Section 5.

This section is displayed only when:

A **Safe Harbour** has **not** been elected for the Subgroup in Section 6, and
The **Transitional Simplified Jurisdictional Reporting Framework** has **not** been elected in Section 7.

Step 1: Select the Subgroup

Select the applicable **Subgroup** tab.

Section 8.1: Elections made by CE / JV

Annual Elections

Step 2: Simplified Calculations for NMCEs

Select **Yes** or **No** for **Election to Apply Simplified Calculations for NMCEs**.

If the entity is not an NMCE, select **No**.

Step 3: Debt Release Election

Select **Yes** or **No** for **Debt Release Election (Article 3.2.1)**.

Step 4: Unclaimed Accrual Election (Annual)

8.1. Elections made by Amelia Castro Ltd of Subgroup SG-001

Annual Elections

Election to apply the Simplified Calculations for NMCEs (Simplified Calculations Safe Harbour) *

Select

Debt Release election (Article 3.2.1) *

Select

Unclaimed Accrual Election (Article 4.4.7 - annual election) *

Select

Five-Year Elections

Step 5: Inclusion of Dividends Election

Select **Yes** or **No** for **Inclusion of Dividends with Respect to Portfolio Shareholdings**.

If **Yes**, enter:

Election Year

Revocation Year (if applicable)

Select **Yes** or **No** for **Foreign Exchange Gains or Losses attributable to an Excluded Equity Gain or Loss**.

If **Yes**, enter:

Election Year

Revocation Year (if applicable)

Step 7: Unclaimed Accrual Election (Five-Year)

Select **Yes** or **No** for **Unclaimed Accrual Election (Article 4.4.7)**.

Election Year

Revocation Year (if applicable)

Step 8: Investment Entity Tax Transparency Election

Select **Yes** or **No** for **Investment Entity Tax Transparency Election (Article 7.5)**.

Election Year

Revocation Year (if applicable)

Step 9: Taxable Distribution Method Election

Select **Yes** or **No** for **Taxable Distribution Method Election (Article 7.6)**.

If **Yes**, enter:

Election Year

Revocation Year

Investment Entity TIN

Actual and Deemed Distributions

Local Creditable Tax Gross-up

Five-year Elections

Inclusion of all dividends with respect to Portfolio Shareholdings (Article 3.2.1(b)) * ⓘ

Yes

Election Year * ⓘ

2026/01/01

Revocation Year ⓘ

2031/12/31

Treating foreign exchange gains or losses attributable to hedging as an Excluded Equity Gain or Loss (Article 3.2.1(c)) * ⓘ

Yes

Election Year * ⓘ

2026/01/01

Revocation Year ⓘ

2031/12/31

Unclaimed Accrual Election (Article 4.4.7 - 5-year election) * ⓘ

No

Investment entity tax transparency election (Article 7.5) * ⓘ

No

Taxable distribution method election (Article 7.6) * ⓘ

Yes

Election Year * ⓘ

2026/01/01

Revocation Year ⓘ

2031/12/31

Taxable Distribution Method details

Investment Entity for which the election is made (TIN) * ⓘ

100000

Actual and deemed distributions of the Investment Entity's GloBE income received by the Constituent Entity-owner * ⓘ

10,000

Local Creditable Tax Gross-up incurred by the Investment Entity * ⓘ

10,000

Constituent Entity-owner's proportionate share of the Investment Entity's Undistributed Net GloBE income * ⓘ

10,000

Other Elections

Step 10: GloBE Loss Election by a Flow-through UPE

Select **Yes** or **No** for **GloBE Loss Election by a Flow-through UPE (Article 4.5.6)**.

If **Yes**, enter:

Election Year

Revocation Year

Step 11: Fair Value Election

Select **Yes** or **No** for **Fair Value Election (Article 6.3.4)**.

Fiscal Year of Triggering Event
Inclusion in Triggering Year (Yes/No)

Note: One of the last two options must be selected as **Yes**.

Other Elections	
GloBE Loss Election by a Flow-through UPE (Article 4.5.6) * ⓘ	
Yes	
Election Year * ⓘ	
2026/01/01	
Revocation Year ⓘ	
2031/12/31	
Fair value election (Article 6.3.4) * ⓘ	
Yes	
Fiscal Year of the triggering event * ⓘ	
2027/01/01	
Inclusion in Fiscal Year of the triggering event as provided under Article 6.3.4(c)(i) * ⓘ	
☐ Yes	
☒ No	
5-year inclusion as provided under Article 6.3.4(c)(ii) * ⓘ	
☒ Yes	
☐ No	

Section 8.2: Constituent Entity Computations

Section 8.2.1: GloBE Income or Loss

Step 1: Review or enter the **Financial Accounting Net Income or Loss (FANIL)** after allocations under Articles 3.4 and 3.5.

Step 2: Enter any **Adjustments** required. Use:

- Positive values for additions
- Negative values for reductions
- Zero if no adjustment is required

Step 3: Enter values for the following GloBE adjustments, as applicable:

- Net Taxes Expense
- Excluded Dividends
- Excluded Equity Gain or Loss
- Included Revaluation Method Gain or Loss
- Gain or Loss from Disposition of Assets and Liabilities
- Asymmetric Foreign Currency Gains or Losses
- Policy Disallowed Expenses
- Prior Period Errors

- Changes in Accounting Principles
- Accrued Pension Expense
- Adjustment for Debt Releases
- Stock-based Compensation

Arm's Length Adjustments

Qualified Refundable Tax Credit / Marketable Transferable Tax Credit

Adjustment for Gains and Losses using Realisation Principle

Adjusted Asset Gain

Intragroup Financing Arrangement Expense

Insurance Company Taxes Charged to Policyholders

Additional Tier One Capital Distributions

Constituent Entities Joining and Leaving an MNE Group

Step 4: If **Adjustments other than the above** is reported, enter the **Description of adjustment**.

Step 5: Review the system-generated **Total Adjustments** value.

Step 6: Review the system-generated **GloBE Income (Loss) of the CE or JV**.

8.2. Constituent Entity Computations	
8.2.1 GloBE Income or Loss	
Financial Accounting Net Income or Loss amount after allocation in Articles 3.4 and 3.5 *	
100,000	
Adjustments	
Net Taxes Expense (Article 3.2.1(a)) *	
10,000	
Excluded Dividends (Article 3.2.1(b)) *	
10,000	
Excluded Equity Gain or Loss (Article 3.2.1(c)) *	
10,000	
Included Revaluation Method Gain or Loss (Article 3.2.1(d)) *	
10,000	
Gain or loss from disposition of assets and liabilities excluded under Article 6.3 (Article 3.2.1(e)) *	
10,000	

Asymmetric Foreign Currency Gains or Losses (Article 3.2.1(f)) *	10,000
Policy Disallowed Expenses (Article 3.2.1(g)) *	10,000
Prior Period Errors (Article 3.2.1(h)) *	10,000
Changes in Accounting Principles (Article 3.2.1(h)) *	10,000
Accrued Pension Expense (Article 3.2.1(i)) *	10,000
Adjustment for Debt releases if the election is opted for (Article 3.2.1) *	10,000
Stock-based compensation (Article 3.2.2) *	10,000
Arm's length adjustments (Article 3.2.3) *	10,000
Qualified Refundable Tax Credit or Marketable Transferable Tax Credit (Article 3.2.4) *	10,000

Adjustment for Gains and losses using realisation principle (Article 3.2.5) *	10,000
Adjusted Asset Gain (Article 3.2.6) *	10,000
Intragroup Financing Arrangement expense (Article 3.2.7) *	10,000
Insurance company taxes charged to policyholders (Article 3.2.9) *	10,000
Increase / decrease to equity attributed to Additional Tier One and Restricted Tier One Capital distributions paid / payable or received / receivable (Article 3.2.10) *	10,000
Constituent Entities joining and leaving an MNE Group (Articles 3.2.11 and 6.2) *	10,000
Reduction of GloBE Income of the UPE that is a Flow-through Entity (Articles 3.2.11 and 7.1) *	10,000
Reduction of GloBE Income of the UPE that is subject to a Deductible Dividend Regime (Articles 3.2.11 and 7.2) *	10,000
Taxable Distribution Method election (Articles 3.2.11 and 7.6) *	10,000

International Shipping Income (Article 3.3) * ⓘ
10,000
Transactions between Constituent Entities (Article 9.1.3) * ⓘ
10,000
Adjustments other than the above * ⓘ
10,000
Description of adjustment *
Testing
Total adjustments
260,000
GloBE Income/(loss) of the CE or member of JV Group
360,000

Cross-Border Allocation of Income or Loss

Step 7: Select **Yes** or **No** for: **"Are there any cross-border allocations of income or loss between a Main Entity and a PE and from a Flow Through Entity?"**

Step 8: If **Yes**, complete the allocation details:

CE/JV TIN

FANIL before adjustment

Basis for adjustment

Other CE/JV TIN

Jurisdiction of other CE/JV Entity

Additions to this CE

Reductions to this CE

FANIL after adjustment

Step 9: Add Below fields for each CE under "Basis for adjustment" type where applicable.

Other CE or member of JV Group (BIN)

Jurisdiction of other CE or member of JV Group

Cross-border allocation of income or loss between a Main Entity and a PE and from a Flow Through Entity (Articles 3.4 and 3.5)

Are there any cross-border allocations of income or loss between a Main Entity and a PE and from a Flow Through Entity? *

Yes

CE or members of JV Groups located in this jurisdiction or stateless CE (BIN) *

1126804601

FANIL before the adjustment *

1,233

Basis for the adjustment

☒ Article 3.4: Allocation of income or Loss between a Main Entity and a Permanent Establishment

Other CE or member of JV Group (TIN) *

1111111111

Jurisdiction of other CE or member of JV Group *

Afghanistan (AF)

Additions to this CE *

1

Reductions to this CE *

2

+ Add Other CE

Cross-border adjustments in terms of Arm's Length Principle Adjustments

Step 10: If an **Arm's Length Adjustment (Article 3.2.3)** amount was entered, indicate whether a cross-border adjustment is required.

Step 11: If applicable, provide:

Other CE/JV TIN

Jurisdiction of other CE/JV

Additions to this CE

Reductions to this CE

Cross-Border Adjustments for Intra-Group Financing Arrangements

Cross-border adjustments in terms of Arm's Length Principle Adjustments

Requirement for an adjustment in terms of Article 3.2.3? *

Yes

Other CE or member of JV Group (TIN) *

987654321

Jurisdiction of other CE or member of JV Group *

Belgium (BE)

Additions to this CE *

100,000

Reductions to this CE *

50,000

+ Add Other CE

Step 12: If an **Intra-Group Financing Arrangement Expense (Article 3.2.7)** amount was entered, indicate whether a cross-border adjustment is required.

Step 13: If applicable, provide:

Other CE/JV TIN

Jurisdiction of other CE/JV

Additions to this CE

Reductions to this CE

Cross-border adjustments in terms of Intra Group Financing Arrangements
Requirement for an adjustment in terms of Article 3.2.7? ⓘ
Yes
Other CE or member of JV Group (TIN) ⓘ
5678934215
Jurisdiction of other CE or member of JV Group ⓘ
The Bahamas (BS)
Additions to this CE ⓘ
200,000
Reductions to this CE ⓘ
20,000
+ Add Other CE

Section 8.2.2: Adjusted Covered Taxes

In the absence of corporate tax in The Bahamas, Covered Taxes are expected to be nil, given business licence tax is not a Covered Tax.

Step 1: Enter the Current Tax Expense with respect to Covered Taxes after required allocations under Article 4.3.

Step 2: Enter the applicable Covered Tax adjustments. If there is no adjustment, enter 0.

Step 3: Complete the adjustment fields, where applicable. If there is no adjustment, enter 0.

Step 4: If Adjustments other than the above is entered, provide the Description of adjustment.

Step 5: Review the system-generated Total Adjustments.

Step 6: Review the system-generated Adjusted Covered Taxes.

Total Adjustments = Sum of all adjustment additions and reductions

Adjusted Covered Taxes = Current Tax Expense + Total Adjustments

8.2.2 Adjusted Covered Taxes

Current tax expense with respect to Covered Taxes after allocations in Article 4.3 taking into account section 4(4) of the DMTT Act * ⓘ

0

Adjustments ⓘ

Covered Tax accrued as an expense in the profit before taxation in the financial accounts (Article 4.1.2(a)) * ⓘ

0

Covered Taxes for uncertain tax position recorded as a reduction to Covered Taxes in prior year (Article 4.1.2(c)) * ⓘ

0

Qualified Refundable Tax Credit or Marketable Transferable Tax Credits recorded as a reduction to current tax expense (Article 4.1.2(d)) * ⓘ

0

Qualified Flow-through Tax Benefits of Qualified Ownership Interests (Article 3.2.1(c)) * ⓘ

0

Current tax expense on income excluded from GloBE Income or Loss (Article 4.1.3(a)) * ⓘ

0

Non-Qualified Refundable Tax Credit or Other Tax Credits not recorded as a reduction to current tax expense (Article 4.1.3(b)) * ⓘ

0

Covered Taxes refunded or credited not treated as an adjustment to current tax expense (Article 4.1.3(c)) * ⓘ

0

Current tax expense related to uncertain tax position (Article 4.1.3(d)) * ⓘ

0

Current tax expense not expected to be paid within three years (Article 4.1.3(e)) * ⓘ

0

Post-filing adjustments (Article 4.6.1) * ⓘ

0

Covered Taxes relating to Net Asset Gain or Net Asset Loss (Article 3.2.6) * ⓘ

0

Reduction of Covered Taxes of the UPE that is a Flow-through Entity (Article 7.1) * ⓘ

0

Adjustment if the Taxable Distribution Method election (Article 7.6.2(b)) is opted for * ⓘ

0

Total Deferred Tax Adjustment Amount (Article 4.1.1(b)) * ⓘ	0
Increase or decrease in Covered Taxes recorded in equity or OCI relating to amounts included in GloBE Income or Loss (Article 4.1.1(c)) * ⓘ	0
Adjustments other than the above * ⓘ	0
Total adjustments	0
Adjusted Covered Taxes	0

Deferred tax

The **Total Deferred Tax Adjustment Amount** is automatically calculated by the system by combining the Deferred Tax Expense Amount for GloBE Purposes with all deferred tax additions, reductions, and minimum-rate recasting adjustments. This amount is subsequently used in the Adjusted Covered Taxes computation.

In the absence of corporate tax in The Bahamas, Covered Taxes are expected to be nil, given business licence tax is not a Covered Tax.

Step 1: Enter Deferred Tax Expense for GloBE Purposes

Enter the **Deferred Tax Expense Amount for GloBE Purposes** before any recasting or adjustments.

Positive amount = Debit to deferred tax expense account

Negative amount = Credit to deferred tax expense account

Step 2: Enter Deferred Tax Adjustments

Enter applicable additions or reductions. If there is no adjustment, enter 0.

Step 3: Enter Additional Adjustments (if applicable)

If **Adjustments other than the above** is entered, provide a description.

Step 4: Review System-Generated Adjustment Amount

Step 5: Review Recasting at Minimum Rate

Enter:

Difference between deferred tax expense recorded at a lower tax rate and recast at Minimum Rate.

Difference between deferred tax expense recorded at a higher tax rate and recast at Minimum Rate.

These values are treated as additional adjustments.

Total Deferred Tax Adjustment Amount =

Deferred Tax Expense

All Additions

All Reductions

Minimum Rate Adjustments

Deferred Tax

Deferred tax expense amount for GloBE purposes * ⓘ

0

Adjustments ⓘ

Deferred tax expense related to items excluded from GloBE Income/Loss (Article 4.4.1(a)) * ⓘ

0

Deferred tax expense related to Disallowed Accruals (Article 4.4.1(b)) * ⓘ

0

Deferred tax expense related to Unclaimed Accruals (Article 4.4.1(b)) * ⓘ

0

Valuation adjustment or accounting recognition adjustment related to a deferred tax asset (Article 4.4.1(c)) * ⓘ

0

Deferred tax expense arising from a re-measurement related to changes in the tax rate (Article 4.4.1(d)) * ⓘ

0

Deferred tax expense related to the generation and use of tax credits (Article 4.4.1(e)) * ⓘ

0

Substitute Loss Carry Forward DTA or deemed Substitute Loss Carry Forward DTA (Article 4.4.1(e)) * ⓘ

0

Disallowed Accruals or Unclaimed Accruals paid during the fiscal year (Article 4.4.2(a)) * ⓘ

0

Recapture Deferred Tax Liability paid during the fiscal year (Article 4.4.2(b)) * ⓘ

0

Recognition of a loss Deferred Tax Asset not included in the financials (Article 4.4.2(c)) * ⓘ

0

Deferred tax expense adjustment resulting from a reduction to a tax rate (Article 4.6.2) * ⓘ

0

Deferred tax expense adjustment resulting from an increase to a tax rate (Article 4.6.3) * ⓘ

0

Adjustment for Constituent Entity joining and leaving an MNE Group (Article 6.2) * ⓘ

0

Deferred tax expense of the UPE that is a Flow-through Entity (Article 7.1) * ⓘ

0

Deferred tax adjustment resulting from transactions between Constituent Entities (Article 9.1.3) * ⓘ

0

Adjustments other than the above * ⓘ

0

Adjustment Amounts

0

Difference between deferred tax expense recorded at a lower tax rate than the Minimum Rate and recast at Minimum Rate * ⓘ

0

Difference between the deferred tax expense recorded at a higher tax rate than the Minimum Rate and recast at Minimum Rate * ⓘ

0

Total Deferred Tax Adjustment Amount ⓘ

0

Section 9: Additional Computation for Constituent Entity / JV

Section 9.1: International Shipping Income Exclusion

Step 1: Select **Yes** or **No** for **Does the Subgroup apply the International Shipping Income Exclusion?**

Step 2: If **No** is selected, proceed to the next subsection.

Step 3: If **Yes** is selected, choose the applicable **CE(s) / JV(s)** within the Subgroup.

Step 4: For each selected CE/JV, enter the **Revenue** and **Costs** for the following activities:

- Article 3.3.2(a) activities
- Article 3.3.2(b) activities
- Article 3.3.2(c) activities
- Article 3.3.2(d) activities
- Article 3.3.2(e) activities
- Article 3.3.2(f) activities

Step 5: Review the values entered for each activity.

Step 6: The system automatically calculates the **Total International Shipping Income**.

Step 7: Repeat the process for all selected CEs / JVs within the Subgroup.

Step 8: Click **Save and Next** to proceed.

Additional Computation for Constituent Entity / JV

1 Subgroup SG-001
JV Group

2 Subgroup SG-002
Standalone MOCEs

9.1 International Shipping Income Exclusion

Does the subgroup apply the International Shipping Income Exclusion? *

Yes

1126470004 - Amelia Castro Ltd 1103666253 - Paramount Multinational Group

1126470004 - Amelia Castro Ltd	
International Shipping Income	
From Article 3.3.2.a activities ⓘ	
Revenue *	Costs *
100,000	1,000
From Article 3.3.2.b activities ⓘ	
Revenue *	Costs *
20,000	200
From Article 3.3.2.c activities ⓘ	
Revenue *	Costs *
80,000	500
From Article 3.3.2.d activities ⓘ	
Revenue *	Costs *
10,000	1,000
From Article 3.3.2.e activities ⓘ	
Revenue *	Costs *
150,000	1,250
From Article 3.3.2.f activities ⓘ	
Revenue *	Costs *
18,000	2,500
Total International Shipping Income	
371,550	

Qualified Ancillary International Shipping Income

Note: This section is completed only if the International Shipping Income Exclusion is selected and applicable for the Subgroup.

Step 1: Select the applicable **CE / JV**.

Step 2: Enter the **Revenue** and **Costs** for the following Qualified Ancillary International Shipping activities:

Article 3.3.3(a)

Article 3.3.3(b)

Article 3.3.3(c)

Article 3.3.3(d)

Article 3.3.3(e)

Step 3: Review the revenue and cost amounts entered for each activity.

Step 4: The system automatically calculates the **Total Qualified Ancillary International Shipping Income**.

Step 5: Repeat the process for all selected CE / JVs within the Subgroup.

Step 6: Click **Save and Next** to continue.

Qualified Ancillary International Shipping Income	
From Article 3.3.3.a	
Revenue	Costs
50,000	2,500
From Article 3.3.3.b	
Revenue	Costs
25,000	5,000
From Article 3.3.3.c	
Revenue	Costs
80,000	20,000
From Article 3.3.3.d	
Revenue	Costs
20,000	2,500
From Article 3.3.3.e	
Revenue	Costs
10,000	10,500
Total Qualified Ancillary International Shipping Income	
144,500	

Effect on Substance-Based Income Exclusion and Covered Taxes

Note: This section is required only when **International Shipping Income Exclusion = Yes**.

Step 1: Enter the Payroll Costs attributable to the excluded International Shipping Income or Qualified Ancillary International Shipping Income.

Step 2: Enter the Carrying Value of Tangible Assets used in generating the excluded International Shipping Income or Qualified Ancillary International Shipping Income.

Effect on Substance-based Income Exclusion and Covered Taxes
Payroll costs attributable to the excluded International Shipping Income or Qualified Ancillary International Shipping Income
1,000,000
Carrying value of tangible assets used in the generation of the excluded International Shipping Income or Qualified Ancillary International Shipping Income
20,000
Covered taxes attributable to the excluded shipping income
80,000

Jurisdictional Cap for the Qualified Ancillary International Shipping Income Exclusion

This section is system-generated based on the International Shipping Income and Qualified Ancillary International Shipping Income reported for all CEs/JV Members within the Subgroup.

Step 1: Review the **Total International Shipping Income for all CEs / JV Members**. This value is automatically populated from Section 9.1.

Step 2: Review the system-calculated **50% Cap**.

Step 3: Review the **Total Qualified Ancillary International Shipping Income for all CEs / JV Members**. This value is automatically populated from Section 9.1.1.

Step 4: Review the system-calculated **Excess of the Cap**, if any.

Jurisdictional cap for the qualified ancillary international shipping income exclusion	
Total International Shipping Income for all CEs / JV members ⓘ	371,550
50% cap ⓘ	185,775
Total Qualified Ancillary International Shipping Income for all CEs / JV members ⓘ	144,500
Excess of the cap if Total Qualified Ancillary International Shipping Income exceeds 50% of Total International Shipping Income ⓘ	0

Section 9.2: Computation of Substance-based Income Exclusion

PE and Flow-through Entity allocation sections should be completed only where applicable.

Payroll Carve-Out

Step 1: Enter the Relevant Eligible Payroll Costs of Eligible Employees performing activities in the jurisdiction.

Step 2: Review the Applicable Mark-up Percentage for the Reporting Fiscal Year.

9.2 Computation of Substance-based Income Exclusion	
Payroll carve-out	
Relevant Eligible Payroll Costs of Eligible Employees performing activities in the jurisdiction *	100,000
Application of relevant mark-up percentage for the Reporting Fiscal Year * ⓘ	9.8 %

Tangible Assets Carve-Out

Step 4: Enter the Carrying Value of Relevant Eligible Tangible Assets located in the jurisdiction.

Step 5: Review the Applicable Mark-up Percentage for the Reporting Fiscal Year.

Step 6: The system calculates the Tangible Assets Carve-Out amount.

Tangible Assets carve-out	
Carrying value of relevant Eligible Tangible Assets located in the jurisdiction *	
200,000	
Application of relevant mark-up percentage for the Reporting Fiscal Year *	
7.8	%
Total	
Substance-based Income Exclusion	
25,400	

Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets to a Permanent Establishment of a Bahamian Main Entity

Complete this section only if Article 5.3.6 applies.

Step 7: Enter the Relevant Eligible Payroll Costs.

Step 8: Enter the Carrying Value of Relevant Eligible Tangible Assets.

Step 9: Select the Location of the Permanent Establishment (PE).

Step 10: Enter the Relevant Eligible Payroll Costs Allocated to PEs.

Step 11: Enter the Carrying Value of Relevant Eligible Tangible Assets Allocated to PEs.

Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets to a Permanent Establishment of a Bahamian Main Entity	
Complete a separate row for each PE jurisdiction where Article 5.3.6 applies.	
Relevant Eligible Payroll Costs *	
300,000	
Carrying value of relevant Eligible Tangible Assets *	
3,000	
Location of PE	
Canada (CA)	
Relevant Eligible Payroll Costs allocated to PEs *	
40,000	
Carrying value of relevant Eligible Tangible Assets allocated to PEs *	
4,000	
+ Add location of PEs	

Allocation of Eligible Payroll Costs and carrying value of Eligible Tangible Assets of a Flowthrough Entity for purposes of the Substance Based Income Exclusion

Complete this section only if there is a Flow-through Entity in the Subgroup.

Step 13: Enter the Relevant Eligible Payroll Costs.

Step 14: Enter the Carrying Value of Relevant Eligible Tangible Assets.

Step 15: Select the Jurisdiction of the CE(s) or JV Group Members.

Step 16: Enter the Relevant Eligible Payroll Costs Allocated to CE Owner (or Excluded).

Step 17: Enter the Carrying Value of Relevant Eligible Tangible Assets Allocated to CE Owner (or Excluded).

Step 18: Click Add Flow-through Allocation to record additional allocations if required.

Step 19: Review the calculated Substance-based Income Exclusion amount.

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	
Complete this table only where there is a flow-through entity in the subgroup.	
Relevant Eligible Payroll Costs *	1,000
Carrying value of relevant Eligible Tangible Assets *	100
Jurisdiction of CEs (or members of JV Group) *	Select
Relevant Eligible Payroll Costs allocated to CE owner (or excluded) *	0
Carrying value of relevant Eligible Tangible Assets allocated to CE owner (or excluded) *	0
Remove allocation + Add flow-through allocation	

Section 9.3: Excess Negative Tax Expense Carry-forward

This Section is only required if the user has not elected for a Safe Harbour in the previous section for the subgroup. This section is required per Subgroup.

Step 1: Review or enter the Balance from Prior Years. This represents the unused Excess Negative Tax Expense Carry-forward brought forward from previous years.

Step 2: Enter the Excess Negative Tax Expense Carry-forward Generated in the Reporting Fiscal Year.

Step 3: Enter the Excess Negative Tax Expense Carry-forward Utilised in the Reporting Fiscal Year.

Step 4: Review the system-generated Excess Negative Tax Expense Carry-forward Remaining for Subsequent Years.

Remaining Carry-forward = Balance from Prior Years + Carry-forward Generated in Reporting Fiscal Year – Carry-forward Utilised in Reporting Fiscal Year

9.3 Excess Negative Tax Expense Carry-forward	
Balance from prior years *	25,000
Excess Negative Tax Expense Carry-forward generated in the reporting fiscal year *	2,000
Excess Negative Tax Expense Carry-forward utilised in the reporting fiscal year *	4,000
Excess Negative Tax Expense Carry-forward remaining for subsequent years *	23,000

Section 9.4 'Top-up Tax and Additional Top-up Tax'

Section 9.4.1: Top-up Tax Computation per Subgroup before Additional Tax

This section is required for each Subgroup where a Safe Harbour has not been elected. Certain fields are automatically populated from Sections 8, 9.2 and 9.3.

Step 1: Enter the Income Tax Expense for the Subgroup.

Step 2: Review or enter the Total Adjustments to Income Tax Expense (Including Deferred Tax Adjustments).

Step 3: Review the Adjusted Covered Tax prior to GloBE Loss and Excess Negative Tax Expense Adjustments.

Step 4: Enter or review the GloBE Loss Deferred Tax Asset established or used.

Step 5: Review the auto-populated Excess Negative Tax Expense Carry-forward Generated.

Step 6: Review the auto-populated Decrease in Covered Taxes by Utilised Excess Negative Tax Expense Carry-forward.

Step 7: Review the system-calculated Adjusted Covered Tax after GloBE Loss and Excess Negative Tax Expense Adjustments.

Step 8: Enter the **Financial Accounting Net Income or Loss**.

Step 9: Review the system-calculated **Total Adjustments to Financial Accounting Net Income or Loss**.

Step 10: Review the system-calculated **Adjusted GloBE Income**.

Step 11: Review the system-calculated **ETR (Effective Tax Rate)**.

Step 12: Review the system-calculated **Top-up Tax Percentage**.

Step 13: Review the auto-populated **Substance-based Income Exclusion (SBIE)**.

Step 14: Review the system-calculated **Excess Profits**.

Step 15: Review the system-calculated **Top-up Tax before Additional Current Top-up Tax**.

9.4 Top-up Tax and Additional Top-up Tax	
9.4.1 Top-up Tax Computation per subgroup before Additional Tax	
Section 8 totals are pre-populated into the editable covered-tax and GloBE-income fields where available.	
Income Tax Expense *	0
Total Adjustments to income tax expense (including Deferred Tax Adjustments) *	0
Adjusted Covered Tax prior to GloBE Loss and Excess Negative Tax Expense adjustments *	0
GloBE Loss Deferred Tax Asset established or used *	5,000
Excess Negative Tax Expense Carry Forward generated	0
Decrease in Covered Taxes by utilised Excess Negative Tax Expense Carry-forward	0
Adjusted Covered Tax after GloBE Loss and Excess Negative Tax Expense adjustments	
	5,000
Financial Accounting Net Income or Loss *	100,000
Total Adjustments to Financial Accounting Net Income or Loss *	0
Adjusted GloBE Income *	100,000
ETR	5.00 %
Top-up Tax Percentage	10.00 %
Substance-based Income Exclusion	0
Excess Profits	100,000
Top-up Tax before Additional Current Top-up Tax	
	10,000

Section 9.4.2: Additional Current Top-up Tax (other than Article 4.1.5)

This table is required only if no Safe Harbour is elected or if the Safe Harbour in GIR1207-1209 is selected above.

Step 1: If **No** is selected for "Is the ETR Adjustment Article applicable to this fiscal year?"

9.4.2 Additional Current Top-up Tax (other than Article 4.1.5)

Is the ETR Adjustment article applicable to this fiscal year? * ⓘ

No

Step 2: If **Yes** is selected, indicate whether the following ETR Adjustment Articles apply:

- Article 3.2.6 – Aggregate Asset Gain Election
- Article 4.4.4 – Deferred Tax Liability Recapture
- Article 4.6.1 – Post-filing Adjustments to Past Covered Taxes
- Article 4.6.4 – Taxes Unpaid Within 3 Years

Step 3: Select the Relevant Prior Fiscal Year requiring recalculation for Each article under step 2.

Step 4: Under **As Previously Reported**, enter or review:

- Net GloBE Income/Loss
- Adjusted Covered Taxes
- ETR
- Excess Profit
- Top-up Tax Percentage
- Top-up Tax

Step 5: Under Recalculated, enter the revised values for:

- Net GloBE Income/Loss
- Adjusted Covered Taxes
- ETR
- Excess Profit
- Top-up Tax Percentage

9.4.2 Additional Current Top-up Tax (other than Article 4.1.5)

Is the ETR Adjustment article applicable to this fiscal year? * ⓘ

Yes

Select those ETR Adjustment Articles under which a recalculation of the ETR and Top-Up Tax for a prior Fiscal Year is required

Article 3.2.6 - Aggregate Asset Gain Election * ⓘ

Yes

Article 3.2.6 - Aggregate Asset Gain Election

Relevant Prior Fiscal Year * ⓘ

2024/01/01

The fiscal year reported must be a prior fiscal year.

As previously reported	Recalculated
Net GloBE Income/Loss * ⓘ	Net GloBE Income/Loss * ⓘ
0	0

Adjusted Covered Taxes * ⓘ 0	Adjusted Covered Taxes * ⓘ 0
ETR * ⓘ 0 %	ETR * ⓘ 0 %
Excess Profit * ⓘ 0	Excess Profit * ⓘ 0
Top-up Tax Percentage * ⓘ 0 %	Top-up Tax Percentage * ⓘ 0 %
Top-up Tax * ⓘ 0	Top-up Tax * ⓘ 0

Article 4.4.4 - Deferred Tax Liability Recapture * ⓘ No
Article 4.6.1 - Post-filing adjustments to past Covered Taxes * ⓘ No
Article 4.6.4 - Taxes unpaid within 3 years * ⓘ No
Additional Current Top-up Tax ⓘ 0

Section 9.4.3: Additional Current Top-up Tax under Article 4.1.5

Complete this section only if the Subgroup's Net GloBE Income is negative (GloBE Loss).
 If GloBE Income ≥ 0 , all values in this section should be reported as Nil (0).
 If Adjusted Covered Taxes ≥ 0 , all values in this section should be reported as Nil (0).
 If Adjusted Covered Taxes is greater than Expected Adjusted Covered Taxes, all values should be Nil (0).
 Expected Adjusted Covered Taxes is system-generated.
 Additional Current Top-up Tax is system-generated and cannot be edited.

Section 9.4.4: DMTT Computation per Subgroup

This section will still be required if the Safe Harbour in GIR1207-1209 is selected.

- Top-up Tax before Additional Current Top-up Tax is pre-populated from Section 9.4.1.
- Additional Current Top-up Tax is the sum of any additional current top-up tax calculated under Sections 9.4.2 and 9.4.3.

DMTT Payable is system-generated and represents the total DMTT liability for the Subgroup.

9.4.3 Additional Current Top-up Tax under Article 4.1.5	
This Section should be completed with nil figures if (1) Adjusted Covered Tax is greater than the Expected Adjusted Covered Tax, for example Adjusted Covered Tax of -10% and Expected Adjusted Covered Tax of -15%; or (2) GloBE Income is greater than or equal to 0; or (3) Adjusted Covered Tax is greater than or equal to 0.	
Adjusted Covered Taxes for the jurisdiction (if negative) * ⓘ 0	
GloBE Loss for the Subgroup * ⓘ 0	
Expected Adjusted Covered Taxes ⓘ 0	
Additional Current Top-up Tax ⓘ 0	

5.4.4 DMTT Computation per subgroup

Top Up Tax before Additional Current Top-up Tax *

0

Additional Current Top-up Tax *

28,500

DMTT payable * 

28,500

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Section 10: Summary for Jurisdiction

This section summarizes the DMTT liability for each Subgroup and calculates the final DMTT payable for the jurisdiction. The section is available throughout the return process but can only be finalized after all required sections have been completed.

Step 1: Select the relevant Subgroup tab.

Step 2: Review the auto-populated Subgroup Identifier.

Step 3: Review the auto-populated DMTT Liability in Currency Used for DMTT Computation.

Step 4: Select the Preferred Acceptable Currency of Payment from the dropdown list.

Options:

- USD (US Dollar)
- BSD (Bahamian Dollar)

Step 5: Review the system-generated Exchange Rate if the selected payment currency differs from the currency used for DMTT computation.

Step 6: Review the system-calculated DMTT Liability of Subgroup in Currency of Payment.

Summary for Jurisdiction

1 Subgroup SG-001
Constituent Entities

2 Subgroup SG-002
Minority-Owned Subgroup

Total DMTT Liability of all Subgroups

Subgroup Identifier

SG-001

DMTT Liability in Currency used for DMTT computation ⓘ

SGD 108,486

Preferred Acceptable Currency of Payment ⓘ

USD (US Dollar)

Exchange Rate for the conversion of the DMTT liability if currency of payment differs from currency of computation ⓘ

1

DMTT Liability of Sub-Group in currency of payment

108,486

Total DMTT Liability of all Subgroups

Step 1: Navigate to the Total DMTT Liability of All Subgroups tab.

Step 2: Review the system-generated Total DMTT Liability for the Year in Currency of Payment. This represents the combined DMTT liability of all Subgroups.

Step 3: Enter the Advance DMTT Payments Made for the Year. The Business Development Incentives Programme (BDIP) credit granted amount should be added to this field. Please use the Addi-

tional Comments field in Section 11 to outline the BDIP amount included. The future returns will include a dedicated field in this section to capture such credits.

Step 4: Review the system-generated DMTT Payable amount.

Step 5: Verify all values and click Next to proceed to the review and submission stage.

Summary for Jurisdiction

1Subgroup SG-001
Constituent Entities

2Subgroup SG-002
Minority-Owned Subgroup

Total DMTT Liability of all Subgroups

Total DMTT Liability for the year in currency of payment

108,486

Advance DMTT payments made for the year ⓘ

3,287

DMTT payable

105,199

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Next

Section 11: Comments and Documentary Support

Step 1: In the Additional Comments field, enter any relevant information, explanations, or supporting remarks relating to the DMTT Return.

Step 2: Review the comments entered and ensure they accurately describe any additional information that should be considered during the review of the return.

Step 3: In the Supporting Document(s) section, attach the required supporting documents.

Step 4: Click **Attach File** and select the document from your device.

Step 5: Click **Upload Document** to upload the selected file.

Step 6: Verify that the uploaded document appears in the document list.

Step 7: To upload additional supporting documents, click Add a New Document and repeat the upload process.

Step 8: If a document was uploaded in error, click Remove to delete it before submission.

Step 9: After reviewing all uploaded documents and comments, click Next to proceed to the Review

The screenshot shows the 'View Return' interface. At the top, a progress bar indicates the current step is 11, 'Comments and documentary support'. The steps are: 1. Introductory Questions, 2. Additional Computation for Constituent Entity / JV, 3. Summary for Jurisdiction, 4. Comments and documentary support (active), 5. Review, and 6. Declaration & Authorised signatory of Designated Local Entity approving the form. Below the progress bar, the section is titled 'Comments and documentary support'. It contains a text area for 'Additional Comments' with the text 'submitting returns by aishwarya'. A character count '31/1000' is visible at the bottom right of the text area. A 'Save Form' button is located in the top right corner.

The screenshot shows the 'Supporting Document(s)' section. It includes a list of instructions: 'Accepted file formats: PDF, JPG, PNG', 'Maximum file size: 5.0 MB', 'Ensure the document is clear and readable', and 'Do not upload password-protected files'. Below this, a document list shows 'Document 1' with the filename 'Capture-1785405002631-1-9agqne.png'. There are 'Remove' and 'Upload Document' buttons next to the filename. An 'Attach file' button is also present. At the bottom, there is an 'Add a new document' button with a plus icon. 'Back' and 'Next' buttons are located at the bottom right of the section.

Section 12: Review DMTT Return

Step 1: Navigate to the Review DMTT Return section.

Step 2: Review the information displayed under each section of the return, including:

- Introductory Questions
- Period Covered by DMTT Return
- MNE Group General Accounting Information
- Ultimate Parent Entity Details
- Elections
- Subgroup Information
- Safe Harbours
- Computations
- Shipping Income Exclusions
- Summary for Jurisdiction
- Comments and Documentary Support

Step 3: Use the navigation panel on the left to move between sections and verify the information entered.

Step 4: Confirm that all mandatory fields have been completed and all information is accurate.

Step 5: If any corrections are required, navigate back to the relevant section, update the information, and save the changes.

Step 6: Review all uploaded supporting documents and comments.

Step 7: Once the review is complete, click Next to proceed to the Declaration & Authorised Signatory section.

Review DMTT Return

• Introductory Questions

- 1 Period covered by DMTT Return
- 2 MNE Group General Accounting Information
- 3 Ultimate Parent Entity details
- 4 Election not to treat an Entity as an Excluded Entity (Article 15.3 - 5-year election)
- 5 Identifying Subgroups in the Bahamas
- 6 Safe Harbours elected
- 7 Elections for the Subgroup identified above
- 8 Computation for Constituent Entity / JV
- 9 Shipping Income Exclusion
- 10 Summary for Jurisdiction
- 11 Comments and documentary support

Introductory Questions

Name of MNE Group
Falcon International Ventures

DMTT UIN
43831365

Fiscal Year of Filing
2024/01/01 - 2024/12/31

Confirm that the Registration Form information is up-to-date
Yes

Name of the Designated Local Entity
Amelia Castro Ltd

BIN
1126470004

Entity Type
Ultimate Parent Entity

Address Line 1
66-C

Address Line 2
Lark Street

Address Line 3
Near water tank

Country
India

State
Assam

Name of UPE for Fiscal Year
Amelia Castro Ltd

Jurisdiction where UPE is located
India

TIN of UPE
1126470004

Name of Designated Filing Entity for GIR filing purposes
Amelia Castro Ltd

Jurisdiction where the Designated Filing Entity is located
India

TIN of Designated Filing Entity for GIR filing purposes
1126470004

Exchange of Information with Jurisdiction where the Designated Filing Entity is located
No

Section 13: Declaration & Authorised signatory of Designated Local Entity approving the form

Step 1: Review the declaration statement displayed on the screen.

Step 2: Select the declaration checkbox to confirm that the information provided in the DMTT Return is true, complete and correct..

Step 3: Enter or verify the details of the Authorised Signatory of the Designated Local Entity (DLE):

Name

Identification Number

Role

Email Address

Phone Number

Date of Signature

Step 4: Provide the details of the Tax Representative filing the DMTT Return on behalf of the DLE:

BIN

Name

Email Address

Phone Number

Declaration & Authorised signatory of Designated Local Entity approving the form

The verification step follows this declaration before submission. A Save as Draft option is also available while completing this declaration.

☒ * I, an authorised signatory for the Designated Local Entity **Adison AND sons**, hereby declare that the information provided is true, correct and complete to the best of my knowledge and belief and that this DMTT Return has been reviewed by a BICA licensee.

NOTE: The electronic submission of this form on behalf of the Designated Local Entity does not create any liability for the BICA licensee who reviews the return or makes the submission. The responsibility for the contents of this form remains that of the Designated Local Entity and the Constituent Entities.

Details of Authorised signatory of DLE approving the form

Name *	Identification number *
Elon	123456789
Role *	Email address *
CEO	J.Elon@lrm.com
Phone number *	Date of Signature *
+1 (242) 359-6568	2026/08/10

Section 14: Verification

Step 1: Review the email address displayed on the verification screen.

Step 2: Click Send OTP (if not automatically triggered) to receive a One-Time Password (OTP) at the registered email address.

Step 3: Check the email inbox associated with the displayed email address.

Step 4: Enter the 6-digit OTP in the OTP input fields provided.

Step 5: Click Verify OTP.

The screenshot shows the 'New Return' interface with a progress bar at the top. The progress bar includes steps: 1. Introductory Questions, 10. Summary for Jurisdiction, 11. Comments and documentary support, 12. Review, 13. Declaration & Authorised signatory of Designated Local Entity approving the form, and 14. Verification (the current step). A 'Save Form' button is in the top right corner.

Verification

Please verify your email using the OTP sent to **J.Elon@ltm.com**

☒ Email Verification

OTP sent to: **J.Elon@ltm.com** Resend OTP in 00:54

Enter OTP

⌂ Resend OTP

Verify OTP

Back Submit

DMTT Return Submitted

Step 1: After successful OTP verification and submission, the system displays the Return Submission Confirmation page.

Step 2: Review the DMTT Return Case ID generated by the system.

Step 3: Review the DMTT UIN associated with the submitted return.

Step 4: Verify the Submission Date displayed on the confirmation page.

Step 5: Review the confirmation message indicating that notification emails have been sent to all relevant entities.

Step 6: Click Download Confirmation to download the submission confirmation for your records.



DMTT Return Submitted
Your DMTT return has been submitted successfully for the fiscal year 2024.

DMTT Return Case ID
DMTT_RET_NEW_268

DMTT UIN
47869124

Submitted on: 2026/08/11Email confirmation sent to all the Entities.

What happens next?

- Your return application is now submitted and available in the dashboard for any Amendments.
- You can now make payments for the DMTT Liability through Bank.
- You can download the submission confirmation as well as return form for your records.

[Download Confirmation](#)[Return to Dashboard](#)

Download confirmation:



DMTT Return Submitted

Your DMTT return has been submitted successfully for the fiscal year 2024.

DMTT Return Case ID

DMTT_RET_NEW_268

DMTT UIN

47869124

Submitted on: 2026/08/11

Email confirmation sent to all the Entities.

What happens next?

- Your return application is now submitted and available in the dashboard for any Amendments.
- You can now make payments for the DMTT Liability through Bank.
- You can download the submission confirmation as well as return form for your records.



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otbsupport@bahamas.gov.bs



Department of Inland Revenue
Nassau, The Bahamas