



Global minimum taxation in Liechtenstein | Obligation to register

January 2025

The GloBE Act came into force in Liechtenstein on 1.1.2024. Domestic Constituent Entities and exempt domestic Constituent Entity of a multinational group or a large domestic group must register within six months of the end of the financial year after entering the scope of application without being requested to do so (see also CONFIDA Newsletter of 5.4.2023)

Implementation in practice

The Tax Authority has now made a registration form ("GloBE registration form") available online, but filling it in requires a number of details, many of which need to be analyzed in more detail:

- Characteristic of the Liechtenstein Constituent Entity to be registered:
 - Ultimate Parent Entity (UPE)
 - Minority-owned Parent Entity (MOPE),
 - Partially-owned Parent Entity (POPE)
 - Constituent Entity (CE)
 - Exempt Constituent Entity (ECE)
- Name and address of the UPE,
- Name and address of the Constituent Entity submitting the tax return for the Liechtenstein top-up tax (QDMTT),
- Name and address of the Constituent Entity to which the Liechtenstein top-up tax is allocated and from which it is collected,
- Name and address of the Constituent Entity filing a tax return for the collection of the IIR top-up tax,
- Name and address of the Constituent Entity filing the GloBE Information Return (GIR).

It is therefore advisable to prepare the registration notification in good time.

Obligation to register

Multinational groups are subject to GloBE minimum taxation if their ultimate parent company achieves an annual turnover of at least EUR 750 million in its consolidated financial statements in at least two of the four

financial years immediately preceding the audited financial year (2024 for the first time: 2020-2023 = observation period).

Registration deadline

The registration obligation is governed by the GloBE Ordinance. This came into force on 29.3.2024 and was supplemented in December 2024 with effect for all financial years beginning on or after 1.1.2024 by the insertion of a new Art. 5 para. 3.

This article stipulates that domestic Constituent Entities and exempt domestic Constituent Entities of a multinational enterprise group or a large domestic group that falls within the scope of GloBE must register within six months of the end of the financial year without being requested to do so.

Based on the currently applicable regulations, the following registration deadlines apply for financial years with the same calendar year if (for example) the turnover threshold was exceeded in the following consolidated financial statements:

31.12.22 + 31.12.23: Deadline expires on 30.6.2025

31.12.23 + 31.12.24: Deadline expires on 30.6.2025

31.12.24 + 31.12.25: Deadline expires on 30.6.2026

31.12.22 + 31.12.25: Deadline expires on 30.6.2026.

Fines

It should be noted that, among other things, a fine of up to CHF 250,000 is provided for the intentional or negligent failure to file the GIR. In cases of tax evasion, the fine may amount to one time the tax evaded.

If you would like advice or require assistance with registration or the preparation of the GloBE Information Return (GIR), please contact our specialists directly:



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