

SCHEDULES

SCHEDULE 12

PILLAR TWO

PART 2

MULTINATIONAL TOP-UP TAX

De-merged groups

- 5 (1) Section 131 (whether de-merged groups meet the revenue threshold) is amended as follows.
- (2) In subsection (1), omit “if” in the second place it occurs (immediately following “A de-merged group meets condition A”).
- (3) For subsection (2) substitute—
- “(2) In this section “qualifying de-merger” means the separation of members of a relevant multinational group into two or more consolidated groups in an accounting period of the relevant multinational group, such that those members cease to all be consolidated by the same ultimate parent.
- (3) A multinational group is relevant in an accounting period if—
- (a) it meets condition A in section 129(2) for that period (revenue threshold exceeded in at least 2 of previous 4 accounting periods), and
- (b) Pillar Two rules apply to any member of the group for that period.”