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PCC TAX BRIEFING

Revised OECD GloBE Return and the 30 September Bahamas DMTT Filing

CLIENT BRIEFINGS | 17 SEPTEMBER 2026
Review period: 11–17 September 2026
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Executive position

The OECD issued a revised GloBE Information Return on 11 September 2026. It incorporates the January 2026 Side-by-Side Package, but the OECD says the revised return is for fiscal years commencing on or after 31 December 2025. The Department of Inland Revenue's current guide nevertheless places the first Bahamian DMTT filing on 30 September 2026 and links that extension to OECD changes.

The OECD release does not amend Bahamian law or extend the deadline. In-scope groups should urgently confirm the precise GIR, DMTT return and portal schema required for the imminent filing.

Key developments

- International standard updated — the OECD's September 2026 GIR incorporates the Side-by-Side Package and revised reporting architecture.
- Application date matters — the OECD says the revised return applies only to fiscal years beginning on or after 31 December 2025.
- Bahamian filing remains imminent — the current DIR guide states that the first DMTT filing is due on 30 September 2026. No further extension was identified.
- Verification required — the applicable return version and portal process for the Bahamian transition-year filing should be confirmed before submission.
- No other consequential domestic tax change was identified during this review period.

1. OECD revises the GloBE Information Return

STATUS	**International administrative standard — not a Bahamian legislative amendment**

On 11 September 2026, the OECD/G20 Inclusive Framework released a revised GloBE Information Return. The return standardises information submitted by multinational enterprise groups for Global Minimum Tax purposes. The revision incorporates the January 2026 Side-by-Side Package and changes intended to support related safe harbours and information exchange.

The OECD states that this revised return is to be used only for filings concerning fiscal years commencing on or after 31 December 2025. That timing must be addressed before applying the new return to an earlier transition year.

The United States Treasury says the revision enables qualifying US-parented groups to elect the Side-by-Side Safe Harbour and reduces duplicative reporting. It also notes that jurisdictions must give domestic effect to relevant arrangements through their own processes. The OECD publication and US announcement therefore do not, without Bahamian implementation, displace the Domestic Minimum Top-Up Tax Act or DIR filing instructions.

Why it matters

The change affects the data model, reporting responsibilities and potential safe-harbour analysis of in-scope groups. It is especially relevant to Bahamian constituent entities of US-parented groups, but the domestic availability and effect of an election must be confirmed rather than assumed.

Who is affected

Multinational groups within the Pillar Two revenue threshold, their Bahamian constituent entities, ultimate parent entities, designated filing entities, tax representatives and accounting firms supporting DMTT filings.

Practical next steps

1. Identify the fiscal year to which each filing relates before selecting a return or schema.
2. Determine the ultimate parent entity's jurisdiction and whether a Side-by-Side election could be relevant.
3. Map Bahamas DMTT obligations separately from any IIR or UTPR exposure elsewhere.
4. Preserve the version-controlled return, instructions, calculations and elections used for each fiscal year.
5. Obtain Bahamian and relevant foreign advice before relying on a safe harbour or reduced reporting position.

2. First Bahamas DMTT filing remains due 30 September

STATUS	**Existing Bahamian administrative deadline — urgent verification required**

DIR's One Tax Bahamas guide states that DMTT applies to multinational groups with consolidated annual revenue above €750 million in at least two of the four preceding fiscal years. The guide says the regime does not apply to a standalone domestic entity or wholly domestic group merely because that threshold is exceeded.

Registration opened on 1 June 2026. The guide states that the first filing deadline is 30 September 2026 and that the package includes the Bahamian DMTT return and the GloBE Information Return. It also indicates that the return must be reviewed by a BICA-licensed accountant or public accounting firm. For a 31 December 2024 fiscal year, the guide states that payment was due on 30 June 2026 and was not extended.

The guide links the filing extension to OECD changes. The OECD's later statement that its September 2026 revised return applies only to fiscal years commencing on or after 31 December 2025 creates an operational question for the imminent transition-year filing. No official Bahamian notice resolving that question was identified during this review.

Why it matters

Using the wrong version, omitting a locally required return or assuming that the OECD update extended the deadline could cause penalties, interest, correction work and inconsistent filings across jurisdictions.

Confirm now

- The fiscal year and entity population covered by the 30 September filing.
- The precise version of the GIR, DMTT return and portal schema accepted by DIR.
- Valid tax-representative authorisation and active Bahamas Identification Numbers.
- DMTT registration and One Tax portal access.
- The required BICA review and sign-off process.
- Reconciliation of any 30 June payment with the final return.
- The correction, objection and penalty process if the position changes.

Verification required

Confirm directly with the Department of Inland Revenue and obtain advice from Bahamian tax counsel and the group's accounting advisers. Foreign advisers should separately confirm the treatment of the same group and fiscal year in other implementing jurisdictions.

3. No consequential development in other principal tax areas

For 11–17 September 2026, no consequential new enactment, subsidiary legislation, Gazette notice, judgment or official administrative measure was identified for VAT; customs duty, excise or tariff measures; stamp duty; real property tax; business licence tax or other sectoral levies; tax concessions or investment incentives; FATCA, CRS, CbC reporting or economic substance; or tax audits, assessments, refunds, objections, appeals and enforcement.

Bahamas Customs published an updated office and port contact listing on 14 September 2026. This is an operational directory rather than a change to customs law, rates, valuation or procedure.

What businesses and taxpayers should consider now

- **Treat 30 September as live.** Do not infer an extension from the OECD publication.
- **Resolve the form-version issue before filing.** Obtain written confirmation where practicable and retain it with the filing record.

- **Align legal, tax and data ownership.** Finance, tax, legal and IT should agree who owns scoping, source data, calculations, review and submission.
- **Minute material judgments.** Document the facts, advice and source versions supporting any safe-harbour, filing or interpretation decision.
- **Reconcile cross-border submissions.** The Bahamas DMTT filing, GIR and parent-jurisdiction filing should use consistent entity, ownership and financial information.

Priority dates

Date	Action
30 September 2026	Current DIR deadline for the first Bahamas DMTT filing by applicable in-scope groups. Confirm accepted forms, schema, authorisations and BICA review immediately.

Primary sources and further reading

1. OECD — GloBE Information Return (September 2026), published 11 September 2026
2. Department of Inland Revenue — One Tax Bahamas Guide
3. US Treasury — Statement on the revised GloBE Information Return, 11 September 2026

Discuss this briefing with PCC

Contact Pinder Commercial Chambers

Discuss Bahamas DMTT readiness, tax governance and cross-border filing coordination. For enquiries, visit pinderchambers.com.