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SARS Updates on GloBE Implementation Timeline and Filing Requirements

The South African Revenue Service ("SARS") has issued an update with regards to its Global Anti-Base Erosion ("GloBE") project implementation timeline. The implementation of the GloBE registration and notification functionality on e-Filing has been rescheduled from December 2025 to 16 March 2026. This adjustment is intended to ensure the quality and reliability of the GloBE initiative, as well as to align technology systems and meet international standards.

Key Highlights:

GloBE Information Return ("GIR") Deadlines:

According to the Global Minimum Tax Administration Act, 2024 ("GMT Administration Act"), for Reporting Fiscal Years starting on or after 1 January 2024, the GIR must be filed within 18 months after the end of the 2024 Fiscal Year, and within 15 months for subsequent years.

- For Multinational Enterprise ("MNE") Groups with Fiscal Years ending before 31 December 2024 (due to a change in Fiscal Year or takeover by another MNE Group), GIRs due prior to 30 June 2026, will now be due by 30 June 2026.

Notification Requirements:

- The GMT Administration Act further requires the notifications regarding the Designated Local Entity ("DLE") and/or Ultimate Parent Entity ("UPE") and/or Designated Filing Entity ("DFE") that will file the GIR to be submitted 6 months prior to the GIR filing deadline including the jurisdiction in which it is located.
- Extensions are proposed for notifications due before 30 April 2026, to now be due by 30 April 2026.

International Alignment:

- South Africa has signed the GloBE Information Return Multilateral Competent Authority Agreement ("MCAA") enabling the automatic exchange of GloBE information with other jurisdictions.
- South Africa achieved qualified status for the Domestic Minimum Top-Up Tax ("DMTT"), reducing the risk of double taxation for MNE groups.

SARS will provide further guidance closer to the implementation date, including system readiness updates and taxpayer testing timelines.

Action Points:

Affected entities should review their compliance plans in light of the new timelines and position themselves for additional await further guidance from SARS as it emerges. the implementation date approaches.

For more information and assistance, please contact:

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Kind regards,

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