STATUTORY INSTRUMENTS

2025 No. 783

DOMESTIC TOP-UP TAX
MULTINATIONAL TOP-UP TAX

The Multinational Top-up Tax (Pillar Two Territories, Qualifying Domestic Top-up Taxes and Accredited Qualifying Domestic Top-up Taxes) (Amendment) Regulations 2025

Made - - - -	*30th June 2025*
Laid before the House of Commons - - - -	*2nd July 2025*
Coming into force - -	*24th July 2025*

The Treasury make these Regulations in exercise of the powers conferred by sections 241 and 256 of, and paragraph 2 of Schedule 16A to, the Finance (No. 2) Act 2023(**1**).

Citation and commencement

1. These Regulations may be cited as the Multinational Top-up Tax (Pillar Two Territories, Qualifying Domestic Top-up Taxes and Accredited Qualifying Domestic Top-up Taxes) (Amendment) Regulations 2025 and come into force on 24th July 2025.

Amendment of the Multinational Top-up Tax (Pillar Two Territories, Qualifying Domestic Top-up Taxes and Accredited Qualifying Domestic Top-up Taxes) Regulations 2025

2.—(1) The Multinational Top-up Tax (Pillar Two Territories, Qualifying Domestic Top-up Taxes and Accredited Qualifying Domestic Top-up Taxes) Regulations 2025(**2**) are amended as follows.

(2) After regulations 2(2), 3(2) and 4(2), insert—

> "(3) Specification in accordance with paragraph (2) has effect on and after the date set out in the notice (which may be a date before the publication of the notice).".

(**1**) 2023 c. 30; Section 241 was amended by paragraphs 8 and 51(1) of Schedule 4 to the Finance Act 2025 (c. 8). Section 256 was amended by paragraph 51(2) of Schedule 4 to the Finance Act 2025. Paragraph 2 of Schedule 16A was inserted by paragraph 41(1) of Schedule 12 to the Finance Act 2024 (c. 3) and amended by paragraph 51(3) of Schedule 5 to the Finance Act 2025.

(**2**) S.I. 2025/406.

Jeff Smith
Anna Turley
Two of the Lords Commissioners of His Majesty's Treasury

30th June 2025

EXPLANATORY NOTE

(This note is not part of the Regulations)

These Regulations amend the Multinational Top-up Tax (Pillar Two Territories, Qualifying Domestic Top-up Taxes and Accredited Qualifying Domestic Top-up Taxes) Regulations 2025 (S.I. 2025/406) ("the 2025 Regulations").

The 2025 Regulations specify territories as Pillar Two territories and taxes as qualifying domestic top-up taxes and accredited qualifying domestic top-up taxes, in support of the implementation and operation of the Organisation for Economic Co-operation and Development/G20 Inclusive Framework's Pillar Two model rules. The 2025 Regulations also provide for the Commissioners for His Majesty's Revenue and Customs to specify further Pillar Two territories, qualifying domestic top-up taxes and accredited qualifying domestic top-up taxes, by way of notice.

Regulation 2 of these Regulations amends regulations 2, 3, and 4 of the 2025 Regulations to enable a specification made under the 2025 Regulations to have effect on and from a date before it is made. This is authorised by sections 241(3), 256(4) of, and paragraph 2(1C) of Schedule 16A to, the Finance (No. 2) Act 2023 (c. 30).

A Tax Information and Impact Note has not been prepared for this Instrument as it contains no substantive changes to tax policy.