



## Tax Alert

Tax and Legal Services

# Barbados issues guidance on payment of Qualified Domestic Minimum Top-Up Tax

## In brief

### What happened?

The Barbados Revenue Authority (BRA) issued Guidance Note OGC No. 8/2026, titled *Payment of Top-Up Tax (GloBE Minimum Tax)* (the Guidance). The Guidance sets out the requirements and procedures for the payment of domestic top-up tax under the Barbados Qualified Domestic Minimum Top-Up Tax (QDMTT), including payment deadlines, filing obligations, currency treatment, payment methods and settlement arrangements.

### Why is it relevant?

Multinational enterprise (MNE) groups with qualifying entities in Barbados that are subject to the Corporation Top-Up Tax Act, 2024-16 (the Act) need to understand their payment obligations and the applicable deadlines. For in-scope MNE groups with a calendar year fiscal period, the first QDMTT payment for fiscal year 2024 is due by 30 June 2026.

The Guidance clarifies the joint and several liability of all qualifying entities within a Barbados DMTT Group (all the Barbados qualifying entities of a MNE group), meaning each entity may be legally responsible for the full amount of any unpaid top-up tax liability.

### Action to consider

In-scope MNE groups with qualifying entities in Barbados should review their status to ensure that they have the necessary arrangements in place to meet the upcoming payment deadlines. This will include identifying a designated filing entity, determining the amount of top-up tax payable, and selecting the appropriate payment method and currency.

# In detail

## Payment deadlines

Payment of top-up tax is due within 18 months after the end of the first fiscal year in which the MNE group becomes subject to the Act and within 15 months after the end of each subsequent fiscal year. For calendar year taxpayers, the first payment (FY 2024) is due by 30 June 2026 and the FY2025 payment is due by 31 March 2027.

## Payment deadlines summary

Fiscal Year	Year-End	Deadline Type	Due Date
FY 2024 (first transitional year)	31 December 2024	18 months	30 June 2026
FY 2025 (subsequent year)	31 December 2025	15 months	31 March 2027

## Filing the domestic top-up tax return

A qualifying entity (or the designated filing entity on behalf of the Barbados DMTT Group) must file a Domestic Top-Up Tax Return in TAMIS by the applicable due date. This return is separate from the GloBE Information Return and reports the Barbados top-up tax liability or, in the case of a nil return, the reason no payment is due.

## Payment by the designated filing entity

Where a designated filing entity files on behalf of the Barbados DMTT Group, the other qualifying entities are not separately chargeable, and the designated filing entity is responsible for paying the full jurisdictional top-up tax. Any internal allocation of the tax burden between group entities is a private arrangement and does not affect the legal tax liability.

## Joint and several liability

All qualifying entities within a Barbados DMTT Group are jointly and severally liable for the full amount of any unpaid top-up tax and the Revenue Commissioner of Barbados Revenue Authority (the Commissioner) may recover the outstanding liability from any one or more of them.

## Treatment of intra-group payments

Intra-group payments of top-up tax are not treated as taxable income, deductible expenses, distributions or charges on income for corporation tax purposes under the Income Tax Act, Cap. 73.

## Currency of payment

The top-up tax liability is denominated in Barbados dollars, converted using the average Central Bank of Barbados exchange rate for the fiscal year (or the prevailing rate on the date of payment if no average is available). Payment may be made in Barbados dollars (BDS) or United States dollars (USD), where USD payments are converted at the prevailing rate on the date of receipt.

## How to pay top-up tax

Payment may be made online via TAMIS (credit card, debit card, or bank transfer), by wire transfer in BDS or USD to the BRA's designated bank accounts, or in person at any BRA office using cheque, cash or card. Please see [Appendix: Payment details](#) for further payment information.

## Penalties and interest for late payment

Late payment attracts a fixed penalty of BDS \$1,000 and interest at 1% per month on the outstanding balance (including accrued interest) until paid in full.

## The takeaway

With the first QDMTT payment deadline of 30 June 2026 fast approaching, affected MNE groups should ensure they have computed their top-up tax liability and are prepared to file and pay through the prescribed channels. Barbados DMTT Groups should also document their internal arrangements for allocating the top-up tax given the joint and several liability provisions.

## Let's talk

For a deeper discussion of how the Pillar Two domestic top-up tax impacts your business, reach out to one of our advisors:



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## Appendix: Payment details

### Online payment

Payments may be made online through the Tax Administration Management Information System (TAMIS) at <https://tamis.bra.gov.bb>. Log in, navigate to the payment tab, and select a preferred payment method (credit card, debit card, or bank-to-bank transfer).

After the online payment or wire transfer has been made, please notify the BRA at [epayments@bra.gov.bb](mailto:epayments@bra.gov.bb) indicating the tax type as Top-Up Tax and the respective fiscal year. This should assist the BRA with allocating the payment correctly.

### Wire transfer – Barbadian dollars (BBD)

Field	Details
Bank Name	Republic Bank (Barbados) Limited
SWIFT Code	BNBABBBB
Branch Code	00002
Beneficiary Name	Barbados Revenue Authority
Beneficiary Address	4th Floor, Weymouth Corporate Centre
Beneficiary Account Number	018313262002

### Wire transfer – United States dollars (USD)

Field	Details
Correspondent Bank	Wells Fargo Bank, New York
SWIFT Code	PNBPUS3NNYC
ABA Code	026005092
For Credit To	FirstCaribbean International Bank (Barbados) Limited
SWIFT Code	FCIBBBBB
Beneficiary Name	Barbados Revenue Authority
Beneficiary Account Number	1001235129

### In-person payment

Payments may be made at BRA offices using cheque, cash, or card. Generate the Electronic Payment Advice (EPA) in TAMIS and present it to the cashier along with the appropriate funds. If paying by cheque, write the EPA number on the back or attach a printed copy of the EPA.

Cheques and EPAs may also be deposited in the designated drop boxes at BRA offices.