



Hong Kong Tax Newsflash

Key compliance requirements under Pillar Two rules in Hong Kong

Hong Kong | Tax & Business Advisory | 3 October 2025 | Issue 251

Hong Kong enacted legislation to implement the OECD's Global Anti-Base Erosion (GloBE) Rules and the Hong Kong Minimum Top-up Tax (HKMTT) in June 2025. Multinational enterprise (MNE) groups with consolidated revenue of at least EUR 750 million in at least two of the four fiscal years immediately preceding the tested fiscal year will fall within the scope of the GloBE Rules and HKMTT. Such in-scope MNE groups are subject to the Income Inclusion Rule and the HKMTT for fiscal years beginning on or after 1 January 2025.

Starting from the year of assessment 2025/26, in-scope MNE groups will be required to comply with new reporting and filing obligations, including the mandatory electronic filing (e-filing) of profits tax returns. To support compliance, the Inland Revenue Department (IRD) has recently issued letters to Hong Kong entities that previously submitted Country-by-Country Reporting notifications, reminding them of their upcoming responsibilities.

This article summarizes the key actions and due dates that in-scope MNE groups must prepare for under the new regime.

Key actions and due dates

Declaration of in-scope status

Each MNE group should assess whether it is an in-scope MNE group for the fiscal year 2025 for the purposes of the GloBE Rules and HKMTT. This assessment depends on whether the group had consolidated revenue of at least EUR 750 million in at least two of the four fiscal years from 2021 to 2024. The entity that received the IRD's letter needs to respond by making a declaration confirming the in-scope status of its group within two months (i.e. typically by late November 2025).

Application for group code

For identification and tax administrative purposes, each in-scope MNE group, Hong Kong standalone joint venture (JV) or JV group must apply for a unique group code (or JV code, as applicable). The group will need to provide this code when accessing the top-up tax notifications and returns under the upcoming Pillar Two Portal, which is an extended function of the Business Tax Portal (BTP), for completion and filing.

An in-scope MNE group should complete and submit the application [Form IR1485](#) together with the above-mentioned declaration to the IRD. For in-scope MNE groups that did not receive the IRD's letter, they can download and submit Form IR1485 to the IRD directly. A JV group is required to submit a separate form to apply for a JV code. The form must be signed by an authorized person (e.g., director, company secretary, manager, or liquidator) and cannot be signed by a service provider.

Submission of a list of Hong Kong entities subject to mandatory e-filing in 2025/26

To assist the IRD in preparing for the mandatory e-filing of profits tax returns, in-scope MNE groups are required to submit a [list of Hong Kong entities](#) that will be subject to e-filing for the year of assessment 2025/26. This list should be sent via email to the [IRD](#) and reported in the above-mentioned declaration.

Registration of a BTP Business Account

Each Hong Kong entity within an in-scope MNE group must register a BTP Business Account so that they can file top-up tax notifications and returns electronically. As the first top-up tax notification will be due on 30 June 2026¹, account registration must be completed prior to this date and preferably as early as possible since certain settings (e.g. assignment of authorized users, appointment of tax representatives or service providers etc.) may take time. The IRD offers a "Bulk Upload" function that allows for the simultaneous registration of up to 500 accounts. Detailed guidance on the registration process is available on the [IRD's website](#).

Application for e-Cert (Organisational) with AEOI Functions

The individual authorised to file top-up tax notifications and returns must hold a valid e-Cert (Organisational) with AEOI Functions. This digital certificate is required for secure authentication when accessing the BTP submission service. The relevant individual should apply for the e-Cert so that it is ready before 30 June 2026¹ to ensure timely submission of the first top-up tax notification. Further information on application procedures can be found on the [Hongkong Post's website](#).

Filing of top-up tax notification

Each Hong Kong entity within an in-scope MNE group has the obligation to file a top-up tax notification with the IRD within 6 months after the end of the fiscal year (i.e. by 30 June 2026¹ for fiscal year 2025). The Hong Kong entities may appoint a designated entity within the group to file one notification on their behalf or engage a service provider to do so. The notification must be filed via the Pillar Two Portal under the BTP.

Filing of the 2025/26 profits tax return (e-filing required)

For the year of assessment 2025/26, all in-scope MNEs in Hong Kong are required to e-file their profits tax returns through the BTP. The deadline for submission is expected to be by mid-September 2026¹, subject to the announcement by the IRD.

¹ for in-scope MNEs with 31 December as the accounting year-end date

Filing of top-up tax return

Each Hong Kong entity within an in-scope MNE group has the obligation to file a single top-up tax return for the purposes of the GloBE Rules and HKMTT. Similar to the top-up tax notification, the group may arrange a designated entity to file the top-up tax return on behalf of all its Hong Kong entities or engage a service provider to do so. The top-up tax return must be filed within 15 months (i.e. by 31 March 2027¹ for fiscal year 2025), or 18 months for the transition year (i.e. by 30 June 2027¹ for fiscal year 2025), after the end of the fiscal year through the Pillar Two Portal under the BTP.

Summary of compliance actions and due dates

| Action | Due date |
|---|---|
| Declaration of in-scope status | by late November 2025 |
| Application for group code | |
| Submission of a list of Hong Kong entities subject to mandatory e-filing in 2025/26 | |
| Registration of a BTP Business Account | by 30 June 2026 ¹ , recommended as early as possible |
| Application for e-Cert (Organisational) with AEOI Functions | |
| Filing of top-up tax notification | by 30 June 2026 ¹ |
| Filing of 2025/26 profits tax return | by mid-September 2026 ¹ (expected) |
| Filing of top-up tax return | by 31 March / 30 June 2027 ¹ |

Our observations

In-scope MNE groups should be fully aware of the actions required and the compliance deadlines under the GloBE Rules and HKMTT regimes. Specifically, they must act promptly to apply for group codes and submit the required entity lists. Early registration of BTP Business Accounts and obtaining of the e-cert (Organisational) with AEOI Functions are critical steps to ensure timely compliance with the top-up tax notification and return filing deadlines. To support compliance, the IRD has published technical guidance on its website, established a dedicated helpdesk, and plans to organize training sessions on the BTP, e-filing and the use of the IRD's iXBRL tools. It is also recommended to seek professional advice or assistance to ensure full compliance with these new obligations.

Tax Newsflash is published for the clients and professionals of Deloitte Touche Tohmatsu. The contents are of a general nature only. Readers are advised to consult their tax advisors before acting on any information contained in this newsletter.

Authors

Doris Chik

Tax Partner

+852 2852 6608

dchik@deloitte.com.hk

Carmen Cheung

Senior Tax Manager

+852 2740 8660

carmcheung@deloitte.com.hk

Kiwi Fung

Tax Manager

+852 2258 6162

kifung@deloitte.com.hk

For more information, please contact:

Tax & Business Advisory

National Leader for Pillar Two Offering

Southern Region Tax Leader

Jennifer Zhang

Tax Partner

+852 2258 6228

jennifzhang@deloitte.com.hk

International and M&A Tax Services

National Leader

Vicky Wang

Tax Partner

+86 21 6141 1035

vicwang@deloittecn.com.cn

Hong Kong Tax Leader

Anthony Lau

Tax Partner

+852 2852 1082

antlau@deloitte.com.hk

Business Tax Services

National Leader

Jessie Wang

Tax Partner

+86 10 8512 2077

jeswang@deloittecn.com.cn

Hong Kong Pillar Two Compliance Leader

Shanice Siu

Tax Partner

+852 2740 8828

shsiu@deloitte.com.hk

Hong Kong Pillar Two Specialists

Roy Phan

Tax Partner

+852 2238 7689

rphan@deloitte.com.hk

Kwan Yu

Tax Partner

+852 2852 1037

kwanyu@deloitte.com.hk

Chung Yiu Hong

Tax Director

+852 2531 1455

yhchung@deloitte.com.hk

Winnie Shek

Tax Partner

+852 2852 1258

winniewmshek@deloitte.com.hk

Sarah Chan

Tax Partner

+852 2852 1628

sarahchan@deloitte.com.hk



About Deloitte

Deloitte China provides integrated professional services, with our long-term commitment to be a leading contributor to China's reform, opening-up and economic development. We are a globally connected firm with deep roots locally, owned by our partners in China. With over 20,000 professionals across 31 Chinese cities, we provide our clients with a one-stop shop offering world-leading audit, tax and consulting services.

We serve with integrity, uphold quality and strive to innovate. With our professional excellence, insight across industries, and intelligent technology solutions, we help clients and partners from many sectors seize opportunities, tackle challenges and attain world-class, high-quality development goals.

The Deloitte brand originated in 1845, and its name in Chinese (德勤) denotes integrity, diligence and excellence. Deloitte's global professional network of member firms now spans more than 150 countries and territories. Through our mission to make an impact that matters, we help reinforce public trust in capital markets, enable clients to transform and thrive, empower talents to be future-ready, and lead the way toward a stronger economy, a more equitable society and a sustainable world.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte Asia Pacific Limited is a company limited by guarantee and a member firm of DTTL. Members of Deloitte Asia Pacific Limited and their related entities, each of which is a separate and independent legal entity, provide services from more than 100 cities across the region, including Auckland, Bangkok, Beijing, Bengaluru, Hanoi, Hong Kong, Jakarta, Kuala Lumpur, Manila, Melbourne, Mumbai, New Delhi, Osaka, Seoul, Shanghai, Singapore, Sydney, Taipei and Tokyo.

This communication contains general information only, and none of DTTL, its global network of member firms or their related entities is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication.