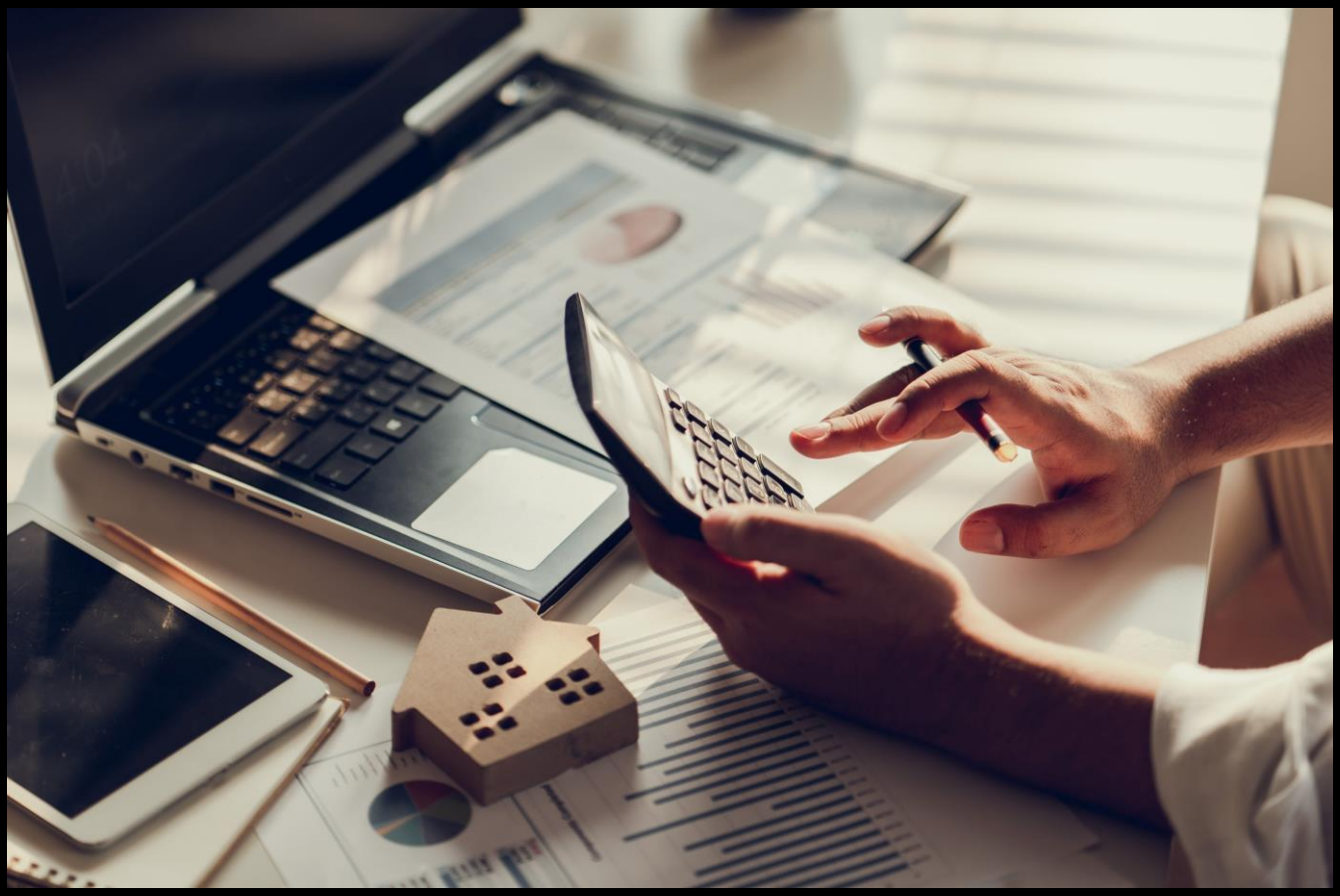
Deloitte.

Tax newsletter
6 January 2026



Bulgarian tax authorities published the QDMTT and IIR/UTPR return templates

On 1 January 2026 the Bulgarian tax authorities published the official return templates for Qualified Domestic Minimum Top-up Tax ("QDMTT") and Income Inclusion Rule ("IIR") / Undertaxed Profits Rule ("UTPR").

Top-up tax under the IIR and UTPR will be reported using a single return template, with the constituent entity ("CE") required to indicate whether the filing relates to IIR or UTPR (or both).

The official GloBE Information Return ("GIR") template is expected to be approved and released at a later stage.

There would be no separate GIR notification form. Instead, information regarding the CE designated to file the GIR and the jurisdiction in which it is located must be disclosed in the QDMTT return, respectively in the IIR/UTPR return (if applicable).

Content of the Return Templates

QDMTT Return

Each Bulgarian CE, as a separate taxpayer, must file its own QDMTT return which consists of two main parts.

Part I – General Information including Identification of the filing CE, the MNE Group and the CE designated to file the GIR, as well as any grounds for a zero QDMTT (e.g., application of any of the Transitional CbCR Safe Harbours or GloBE loss position with no additional top-up tax).

Part II – QDMTT Calculation and Allocation including:

- High-level summary of the QDMTT calculation (adjusted covered taxes, GloBE income, ETR, QDMTT rate, substance-based income exclusion ("SBIE"), additional top-up tax, etc.).
- Allocation of the QDMTT to the filing CE, i.e. determination of its share in the QDMTT due.

IIR/UTPR Return

Part I: General identification details and filing information (mostly consistent with the QDMTT return)

Part II: Top-up tax under the IIR, reported on a jurisdictional basis

Part III: Top-up tax under the UTPR allocated in accordance with the UTPR allocation formula.

Important Notes and Deadlines

- The first available filing date is 10 January 2026, while the earliest filing deadline is 30 June 2026.
- The QDMTT return should be prepared based on the GIR, taking into account the Bulgarian specific requirements.
- The Bulgarian QDMTT return and IIR/UTPR return must be completed in local currency:
  - BGN for fiscal periods ending on or before 31 December 2025;
  - EUR for fiscal periods ending on or after 1 January 2026.
- Where the QDMTT is calculated in a different currency, the exchange rate of the Bulgarian National Bank as at the last day of the relevant fiscal period should be applied.

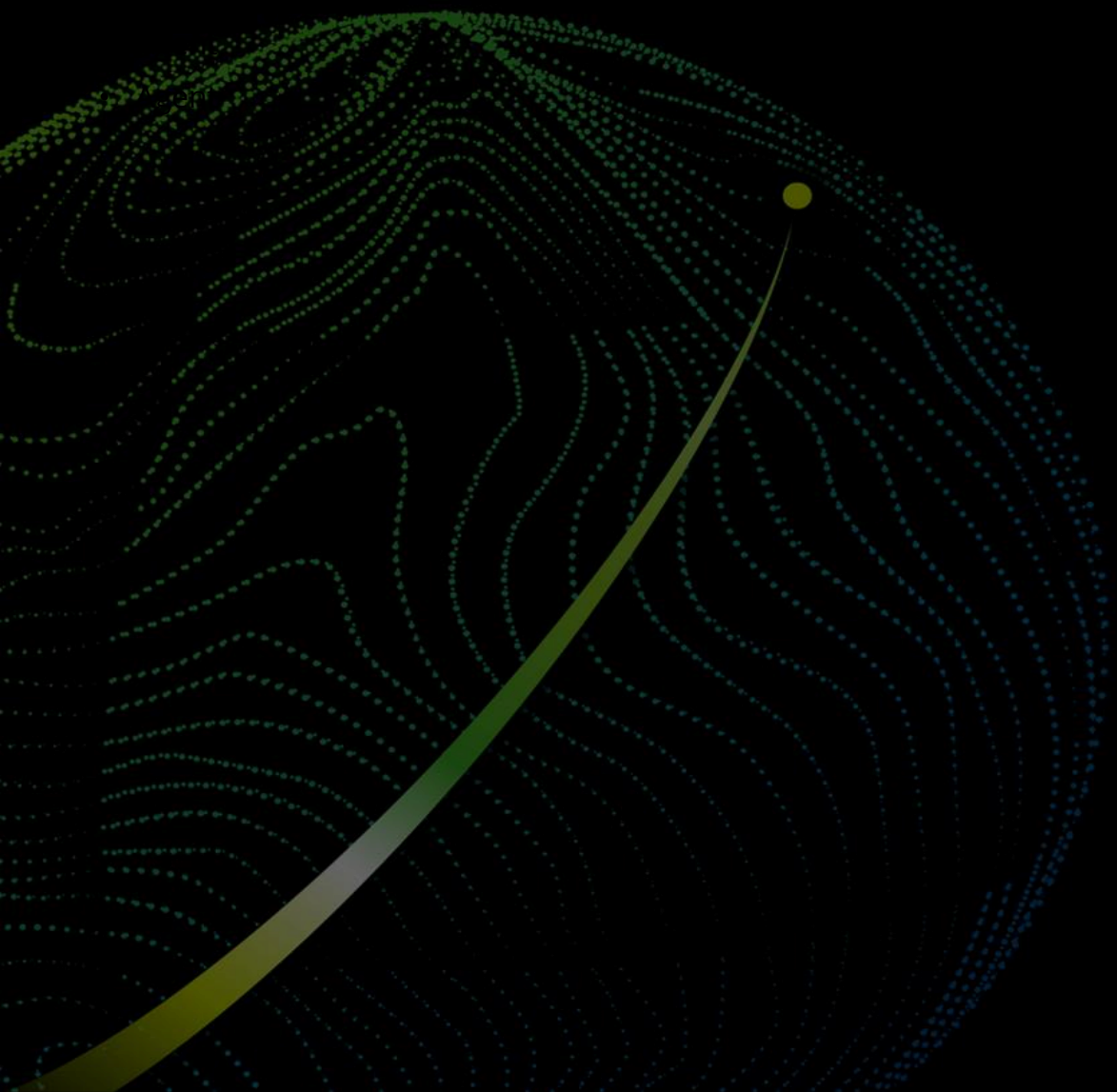
How can Deloitte assist you?

We can assist you with:

- safe harbour assessment,
- preparation/review of the top-up tax expense in the financial statements,
- preparation/review of:
  - IIR/UTPR and QDMTT returns, including the notifications about the CE which will file the GloBE information return,
  - GloBE information return for determining the top-up tax for each jurisdiction,

Advise on the global minimum tax rules in Bulgaria and abroad, including through the global network of member firms of Deloitte.

With respect to the above, Deloitte's globally developed cloud-based tool called Pillar Two Agent could be utilized.



Contact us

Alexander Cherinko

Partner
alcherinko@deloittece.com

Vasil Lenkov

Senior manager
vlenkov@deloittece.com

Atanas Arshinkov

Senior Manager
aarshinkov@deloittece.com

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.

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited („DTTL“), its global network of member firms or their related entities (collectively, the “Deloitte organization”) 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. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.

© 2026. For information, contact Deloitte Bulgaria.