

## Table of Concordance

This Table of Concordance cross-references certain provisions of the proposed *Global Minimum Tax Act* (the “Act”) with the source documents on which they are based, being the provisions of the GloBE model rules, the GloBE commentary, the administrative guidance in respect of the GloBE model rules, the GloBE Information Return and the GloBE Safe Harbours and Penalty Relief document, all as approved by the Inclusive Framework and published by the OECD. (Terms used in this paragraph and defined in the Act have the meanings assigned in the Act.)

This Table of Concordance is intended only as an unofficial guide for users of the Act, and neither as a source of law nor interpretive aid. While every effort was made to achieve accuracy, only the Act is authoritative.

<i>Global Minimum Tax Act</i>	<i>GloBE model rules, GloBE commentary, administrative guidance (AG)</i>
<b><u>Part I – Interpretation and Rules of Application</u></b>	
4(1) (selected definitions set out below)	Art. 10.1.
“adjustment year”	Art. 5.4.1.
“aggregate asset loss”	Art. 3.2.6.
“blended controlled foreign company tax regime”	Commentary to Art. 4.3.2.(c), para. 58.1 to 58.7 (AG Feb. 2023, 2.10.)
“disallowed accrual”	Art. 4.4.6.
“excluded dividend”	Art. 3.2.1.(b) and Art. 10.1.; Commentary to Art. 3.2.1.(b), para. 37, and to Art. 10.1. “ownership interest”, para 85 (AG Feb. 2023, 2.3.)
“fiscally transparent”	Art. 10.2.2.
“flow-through entity”	Art. 10.2.1.
“GIR”	Art. 8.1.4.; GloBE Information Return July 2023
“GIR due-date”	Art. 8.1.6. and 9.4.1.
“hybrid entity”	Art. 10.2.5.
“international shipping”	Art. 3.3.2.; Commentary to Art. 3.3.2., para. 152
“international traffic”	Art. 3.3.2.; Commentary to Art. 3.3.2. para. 152
“joint venture group”	Art. 10.1. “JV Group”
“joint venture parent”	Art. 10.1. “Joint Venture”
“joint venture subsidiary”	Art. 10.1. “JV Subsidiary”
“local taxation year”	Art. 3.2.2.
“minority-owned subgroup” para. (b)	Art. 5.6.2.
“mutual insurance company”	Commentary to Art. 7.5., para. 91 and 91.1 (AG Feb. 2023, 3.6.)

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“patronage dividend”	Art. 7.2.
“qualified debt release amount”	Commentary to Art. 3.2.1., para. 86.1 to 86.7 (AG Feb. 2023, 2.4.)
“qualified domestic minimum top-up tax”	Commentary to Art. 10.1., para. 118.1 to 118.53 (AG Feb. 2023, 5.1.); Chapters 4 and 5.
“qualifying tier one capital”	Commentary to Art. 3.2.10., para. 142 (AG Feb. 2023, 3.3.)
“recapture exception accrual”	Art. 4.4.5.
“reverse hybrid entity”	Art. 10.2.1.(b)
“stateless constituent entity”	Art. 10.3.2.(b) and 10.3.3.(d)
“substitute loss carry-forward recapture amount”	Commentary to Art. 4.4.1.(e), para. 82.1 to 82.4 (AG Feb. 2023, 2.8.)
“substitute loss carry-forward tax credit”	Commentary to Art. 4.4.1.(e), para. 82.1 to 82.4 (AG Feb. 2023, 2.8.)
“tax transparent entity”	Art. 10.2.1.(a)
“tax transparent structure”	Art. 10.2.3.
“transitional special allocation year”	Commentary to Art. 4.3.2., para. 58.1 to 58.7 (AG Feb. 2023, 2.10.)
“unclaimed accrual”	Art. 4.4.7.
4(5)	Commentary to Art. 10.1., para. 23, 39 and 145; Commentary to Art. 3.2.1., para. 86.6 (AG Feb. 2023, 2.4.)
4(7)	Art. 10.2.4.
5(1)	Art. 10.3.1.
5(2)	Art. 10.3.2.
5(3)	Art. 10.3.3.
5(4)	Commentary to Art. 10.3., para. 174 and 175
5(5)	Art. 10.3.6.
6(1)	Art. 10.3.4.
6(2)	Art. 10.3.4.(b)(ii)
6(3)	Art. 10.3.5.
7(1)	Commentary to Art. 3.1.2., para. 5.1 to 5.6 (AG July 2023); Commentary, Introduction, para. 17.1 and 17.2 (AG July 2023)
7(2)	Commentary, Introduction, para. 20.1 to 20.4 (AG July 2023)
9(1)	Art. 1.1.
9(2)	Art. 1.1.
9(3)	Art. 6.1.1.(a) and (b)
9(4)	Art. 6.1.1.(c)
9(5)	Art. 6.1.2.
9(6)	Art. 6.1.3.

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11(1)	Art. 1.3.1. and 1.3.3.
11(2)	Art. 1.3.2.
11(3)	Art. 5.1.3.
12(1)	Art. 1.4.1.
12(2)	Commentary to Art. 1.4.1., para. 36.1 to 36.4 (AG Feb. 2023, 1.4.)
13(1)	Art. 1.5.1. and 1.5.2.; Commentary to Art. 1.5.2., para 43.1, 53 and 54.1 (AG Feb. 2023, 1.5.)
13(2)	Art. 1.5.3.
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15(1)	Art. 2.1. and 2.3.
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17(1)(b)	Art. 3.4.1. and 3.4.3.
17(2)	Art. 3.4.2.
17(3)	Art. 3.4.4.
17(4)	Art. 3.1.2.
17(5)	Commentary to Art. 3.1.2, para. 9
17(6)	Art. 3.5.
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18(1)	Art. 3.2.1.(a)
18(2)	Commentary to Art. 3.1.2, para. 4
18(3)	Art. 3.2.1.(b); Commentary to Art. 3.2.1.(b), para. 45 (AG Feb. 2023, 3.5.)
18(4)	Art. 3.2.1.(c)

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18(5)	Commentary to Art. 3.2.1.(b) and Art. 3.2.1.(c), para. 36 and 54 (AG Feb 2023, 3.4.)
18(6)	Commentary to Art. 3.2.1.(c), para 57.1 to 57.4 (AG Feb 2023, 2.2.)
18(7)	Commentary to Art. 3.2.1.(c), para 57.1 to 57.2 (AG Feb. 2023, 2.9.)
18(8)	Art. 3.2.1.(d)
18(9)	Art. 3.2.1.(f)
18(10)	Art. 3.2.1.(g)
18(11)	Art. 3.2.1.(h)
18(12)	Art. 3.2.1.(i) and Commentary to Art. 3.2.1.(i), para. 85 to 86.1 (AG Feb. 2023, 2.5.)
18(13)	Art. 3.2.3.
18(14)	Art. 3.2.3.
18(15)	Art. 3.2.4.
18(16)	Art. 3.2.7.
18(17)	Art. 3.2.9.
18(18)	Art. 3.2.10. and Commentary to Art. 3.2.10., para. 142 (AG Feb. 2023, 3.3.)
18(19)	Art. 3.2.2.
18(20)	Art. 3.2.5.
18(21)	Art. 3.2.6.
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18(23)	Commentary to Art. 3.2.1., para. 86.1 to 86.7, (AG Feb. 2023, 2.4.)
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20(4)	Art. 7.1.4.
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22(4)	Art. 7.1.3. and 7.2.2.
22(5)	Art. 4.1.4.
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24(2)(b)	Art. 4.3.4.
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24(4)(a)	Art. 4.3.2.(c)
24(4)(b)	Commentary to Art. 4.3.2.(c), para. 58.1 to 58.7 (AG Feb. 2023, 2.10.)
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25(3)	Commentary to Art. 4.4.1.(e), para. 82.1, 82.2 and 82.4 (AG Feb. 2023, 2.8.)
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32(4)	Commentary to Art. 5.3.3., para. 33 and 33.1 (AG July 2023)
32(5)	Art. 5.3.7.

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32(10)	Art. 5.3.7.
32(11)	Commentary to Art. 5.3.4., para. 48.1 (AG July 2023)
32(12)	Art. 5.3.4. and Commentary to Art. 5.3.4., para. 43 to 43.1.7. (AG July 2023)
32(13)	Art. 5.3.4. and 5.3.5.; Commentary to Art. 5.3.3., para. 38 and 38.1 (AG July 2023); Commentary to Art. 5.3.5., para. 50.1. (AG July 2023); Commentary to Art. 5.3.4., para. 43 to 43.1.7. (AG July 2023)
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49	Commentary to Art. 10.1., para. 118.9 and 118.13 (AG Feb. 2023, 5.1.), and para. 118.10 to 118.12 (AG July 2023)
50(1)	Commentary to Art. 10.1., para. 118.33 to 118.39 (AG Feb. 2023, 5.1), and para. 118.30 and 118.33.1 (AG July 2023)
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“designated local entity”	Art. 10.1.
“qualifying competent authority agreement”	Art. 10.1.

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65	Commentary to Art. 10.1., para. 118.12 (AG July 2023)
97(1)	Art. 8.1.8.
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