



SME INFO HU

CHANGES TO THE GLOBAL MINIMUM TAX OBLIGATION ADOPTED IN JUNE 2025

In this publication, we review the changes to the Act on Global Minimum Tax, the Act on Rules of Taxation and the Act on Accounting, adopted in June 2025, affecting the global minimum tax obligations.

We also outline the significance of the so-called DAC9 Directive proposal adopted by the EU in April.

The SME Team

The purpose of SME INFO is to provide general information and to draw the attention to the current changes in law which we believe to be important for the business operation of our clients. It is not a replacement for careful review of the acts and rules, and the consultation with your tax advisor.

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1 CHANGES AFFECTING THE TOP-UP TAX LIABILITY ENSURING THE GLOBAL MINIMUM LEVEL OF TAXATION

1.1 Changes to the Act on Global Minimum Tax

Domestic members of multinational or large-scale domestic groups with calendar year, subject to the Global Minimum Tax Act had to submit a declaration of their top-up taxpayer status for the year 2024 by 31 December 2024. Members of groups with different business year should (or had to) file this declaration within 12 months of the start date of the tax year subject to top-up tax liability.

According to the change adopted as part of the spring tax package, this deadline will be the last day of the second month following the last day of the tax year,⁽¹⁾ i.e. the end of February in the case of calendar year taxpayers.

Entry into force: 20 June 2025

1.2 Changes to the Act on Rules of Taxation

In the event of failure to comply with the obligation or late fulfilment of the **declaration** described in the previous section, a default penalty of HUF 5 million may be imposed pursuant to the provisions of the Act on the Rules of Taxation.

Violation of the obligation to submit tax return and, according to the amendment, the obligation to provide data can also be punished with a default penalty of HUF 10 million.⁽²⁾

At the same time, based on the transitional provisions of the Act on the Rules of Taxation, no penalty may be imposed for tax years beginning before 31 December 2026, if the group member acted as expected of the group member in the given situation.



The local level top-up tax return and data reporting for the year 2024 will be due on 30 June 2026 for calendar year taxpayers.

Entry into force: 20 July 2025

1.3 Changes to the Act on Accounting

In order to clarify the accounting treatment, the Act on Accounting has been supplemented with a provision that the top-up tax shall be booked and recorded as an accrual until its return against the tax payment liability as an expense,⁽³⁾ with regard to the fact that the return containing the actual amount of the tax is due after the deadline for the submission of the financial statements for the year concerned.

The accrual must be transferred to the tax payment obligation at the time of tax return.

Entry into force: optional for the business year starting in 2025, mandatory for the business year starting in 2026.

2 THE IMPORTANCE OF “DAC9”

In April 2025, the Council of the EU adopted a proposal to amend the Directive on Administrative Cooperation in the field of Taxation (Directive 2011/16/EU, „DAC“), the so-called „DAC9“,⁽⁴⁾ which aims to facilitate the fulfilment of data reporting obligations under the Global Minimum Tax Directive.

The essence of the facilitation is that multinational companies **only have to submit one additional report at central level** for the entire group, instead of each group member performing it individually in their country of residence.

In addition, under the Directive:

- a standard form will be introduced for the submission and provision of data within the EU and
- the automatic exchange of information between Member States will also be extended to the data report.

Member States **have to introduce** the Directive into their own legal system **until 31 December 2025**, and the first global minimum tax reporting for 2024 is required by 30 June 2026.



In practice, thanks to the directive, the administrative obligation of Hungarian group members will be reduced if another member within the group is appointed to provide data for the entire group, but regardless of this, the Hungarian subsidiary or branch office must still be able to provide the detailed data necessary for the preparation of the calculation.

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References:

- 1 Section 44.5 (1) of Act LXXXIV of 2023
- 2 Section 227/B.5 of Act CL of 2017
- 3 Section 44.5(9) of Act C of 2000
- 4_ www.consilium.europa.eu: Council adopts rules to extend cooperation and information exchange between tax authorities to minimum effective corporate taxation