

GUIDANCE NOTE

Reference	OGC No. 17 /2026
Title	Exchange of GloBE Information Returns under the GIR MCAA
Subtitle	Activated Exchange Relationships and Their Application to Barbados
Purpose	This Guidance Note provides general guidance on the exchange of GloBE Information Returns ("GIRs") under the Multilateral Competent Authority Agreement on the Exchange of GloBE Information (hereinafter the "GIR MCAA"), and on how activated exchange relationships affect GIR filing for groups with Barbadian Constituent Entities, in the context of the <i>Corporation Top-Up Tax Act, 2024-16</i> .

Exchange of GIRs under the GIR MCAA

The [GIR MCAA](#) provides for the automatic exchange of GIR information between the tax administrations of [GIR MCAA signatories](#). It allows in-scope groups to file the GIR once, centrally, rather than in every jurisdiction.

Barbados and the GIR MCAA

Barbados signed the GIR MCAA, which entered into force for Barbados on 12 May 2026. The Competent Authority of Barbados (the Barbados Revenue Authority ("BRA")) has submitted its initial notifications under Section 8, which have been received and recorded by the Coordinating Body Secretariat.

Activated exchange relationships

Signing the GIR MCAA does not by itself allow exchange. A relationship between Barbados and another jurisdiction is activated only when the competent authorities of both jurisdictions have submitted matching notifications. The Coordinating Body Secretariat processes activations on an ongoing basis, including those involving Barbados.

The activated relationships are publicly available, including to MNE groups, on the OECD's [Automatic Exchange of Information – Exchange relationships](#) page, which is updated as new activations are processed.

Guidance Note: Exchange of GIRs under the GIR MCAA**Timing**

The exchange deadline for the first reporting year (FY24) is **31 December 2026**, six months after the 30 June 2026 filing deadline.

In later years, it is three months after the filing deadline.

Example: a group has a 31 December year-end.

- *FY24 (first reporting year): the filing deadline is 30 June 2026, 18 months after year-end under the transitional rule. The exchange deadline is 31 December 2026, six months later.*
- *FY25 onwards: the filing deadline is 15 months after year-end, so 31 March 2027 for FY25. The exchange deadline is three months later, 30 June 2027.*

Some jurisdictions have not yet completed the domestic approval process required for the GIR MCAA to take effect, and so may not be able to exchange GIRs by 31 December 2026.

Application to groups with Barbadian entities

A GIR filed in another jurisdiction may be exchanged with Barbados by the applicable exchange deadline depending on the position of the group:

- **Group files outside Barbados, relationship activated:** the BRA will not require a separate Barbados GIR if the GIR is received by 31 December 2026. Groups should not assume relief until the relationship is activated and the GIR has been exchanged.
- **Group files outside Barbados, relationship not activated, or GIR not received by the exchange deadline:** the BRA may require a GIR to be filed in Barbados and will notify the group accordingly. The group may also need to file in other jurisdictions.
- **Group files in Barbados:** the GIR will be exchanged only with jurisdictions with which Barbados has an activated relationship and which are entitled to receive it. Other jurisdictions may still require a local filing.

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7 October 2026