



Finance (No. 2) Act 2023

2023 CHAPTER 30

PART 4

DOMESTIC TOP-UP TAX

CHAPTER 1

INTRODUCTION

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- (1) The purpose of [this Part](#) is to make provision for a qualified domestic minimum top-up tax within the meaning of the Pillar Two rules.
- (2) For that purpose, [this Part](#) makes provision for a tax payable in respect of qualifying entities (that will be located in the United Kingdom) whose rate of tax (as determined in accordance with [this Part](#)) is less than 15%.
- (3) The tax is to be known as “domestic top-up tax”.
- (4) [This Part](#) applies (with modifications) many of the provisions of [Part 3](#) (multinational top-up tax) for the purposes of—
 - (a) determining liability to domestic top-up tax, and
 - (b) administering domestic top-up tax.
- (5) Except where the contrary appears, expressions used in [this Part](#) and in [Part 3](#) (multinational top-up tax) have the same meaning in [this Part](#) as they have in [Part 3](#).