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Extending the ban on foreign purchases of established dwellings.

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Reforms to the Register of Foreign Ownership of Australian Assets.

QC 28942

Foreign investment – extending the ban on foreign purchases of established dwellings

Extending the ban on foreign purchases of established dwellings.

Last updated 12 May 2026

In the Budget 2026–27, the Government announced that it will extend the temporary ban on foreign purchases of established residential dwellings by 2 years and 3 months until 30 June 2029. The ban was originally implemented for 2 years from 1 April 2025.

The extension of the ban means that until 30 June 2029, foreign persons, including temporary residents and foreign-owned companies, cannot buy an established dwelling in Australia, unless an exception applies. These limited exceptions will include investments that significantly increase housing supply or support the availability of housing supply.

Other existing exemptions remain in place, such as for purchases by:

- permanent residents
- New Zealand citizens.

The ATO will continue to enforce the ban through enhanced screening of foreign investment proposals relating to residential properties.

For more information, see Budget Paper No. 2, Budget 2026–27.

QC 104933

Implementation of a global minimum tax and a domestic minimum tax

The Government announced it will implement key aspects of Pillar Two of the OECD/G20 Two-Pillar Solution.

Last updated 12 May 2026

Pillar Two

On 9 May 2023, as part of the 2023–24 Budget, the Government announced it will implement key aspects of Pillar Two of the OECD/G20 Two-Pillar Solution to address the tax challenges arising from digitalisation of the economy. These changes mark a pivotal step in ensuring that multinational enterprise (MNE) groups pay the right amount of tax in Australia. This measure is now law.

The primary legislation – Taxation (Multinational—Global and Domestic Minimum Tax) Act 2024, Taxation (Multinational—Global and Domestic Minimum Tax) Imposition Act 2024 and Treasury Laws Amendment (Multinational—Global and Domestic Minimum Tax) (Consequential) Act 2024 – are now law. The subordinate legislation – Federal Register of Legislation – Taxation (Multinational—Global and Domestic Minimum Tax) Rules 2024 – is also now law. The legislation includes a:

- 15% global minimum tax for large MNEs with the
  - Income Inclusion Rule applying to fiscal years starting on or after 1 January 2024
  - Undertaxed Profits Rule applying to fiscal years starting on or after 1 January 2025.
- 15% domestic minimum tax applying to fiscal years starting on or after 1 January 2024.

In-scope multinational entities (MNE)

The global minimum tax and domestic minimum tax will:

- apply to large MNEs with annual global revenue of EUR750 million or more
- be based on the OECD Global Anti-Base Erosion (GloBE) Model Rules, which are designed to ensure MNEs pay an effective minimum level of tax on the income arising in each jurisdiction where they operate.

Global and domestic minimum tax

A global minimum corporate tax rate of 15% prevents a 'race to the bottom' on corporate tax rates and protects our corporate tax base. The global minimum tax rules would allow Australia to apply a top up tax on a resident multinational parent or subsidiary company where the group's income is taxed below 15% overseas.

A domestic minimum tax would give Australia first claim on top-up tax for any low-taxed domestic income. In a small number of instances, a large multinational company's effective Australian tax rate may fall below 15%. In these instances, the domestic minimum tax applies so that Australia collects the revenue that would otherwise have been collected by another country's global minimum tax.

The ATO is developing systems to enable MNEs to lodge the GloBE Information Return (GIR) and pay any arising top-up tax liabilities payable in Australia to the ATO.

Global anti-base erosion rules (Pillar Two) side-by-side package implementation

On 12 May 2026, as part of the 2026–27 Federal Budget , the Government announced that it will implement the side-by-side package that was agreed by the OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting. The package contains a number of simplifications and safe harbours to ensure the continued coordinated operation of the global minimum tax.

A key component of the package is the side-by-side safe harbour, which applies to fiscal years commencing on or after 1 January 2026. Under the side-by-side safe harbour, the profits of MNE groups headquartered in qualifying side-by-side jurisdictions will not be in scope of Australia's global minimum tax. Australia's domestic minimum

tax will continue to apply for all fiscal years. The side-by-side safe harbour:

- will not change the Australian lodgment requirements for fiscal years that commenced in 2024 or 2025
- only impacts lodgment and payment obligations for fiscal years commencing from 1 January 2026 (generally due from March 2028).

More information

- Global and domestic minimum tax
- Federal Register of Legislation – Taxation (Multinational—Global and Domestic Minimum Tax) Rules 2024
- Implementation of a global minimum and domestic minimum tax working group
- International community strikes a ground-breaking tax deal for the digital age – OECD
- Global agreement on corporate taxation: addressing the tax challenges arising from the digitalisation of the economy
- Tax Challenges Arising from the Digitalisation of the Economy – Global Anti-Base Erosion Model Rules (Pillar Two) – OECD

You can direct questions about our administration of the global minimum tax and domestic minimum tax to Pillar2Project@ato.gov.au.

QC 72503

OECD Crypto Asset Reporting Framework and domestic reporting

The government has announced it will implement the OECD CARF Framework and domestic reporting.

Last updated 16 October 2026

On 17 December 2025, as part of the 2025–26 Mid-Year Economic and Fiscal Outlook (MYEFO), the government announced it will implement the Crypto-Asset Reporting Framework (CARF) and a domestic crypto tax transparency reporting regime. There would also be associated amendments to the Common Reporting Standard (CRS).

This measure is not yet law.

The CARF and associated CRS updates

The CARF is an international standard, developed by the Organisation for Economic Co-operation and Development (OECD) to improve tax transparency for crypto-asset transactions. It enables participating jurisdictions to collect and automatically exchange information on crypto-asset transactions involving tax residents of other jurisdictions. Further information about the CARF is available through the OECD's International Standards for Automatic Exchange of Information in Tax Matters and the Crypto-Asset Reporting Framework XML Schema.

The CRS is the existing OECD framework for automatic exchange of financial account information between jurisdictions. The amendments to the CRS modernise the standard to ensure complementarity with the CARF and strengthen due diligence and reporting requirements for financial institutions.

The implementation of the CARF and associated CRS updates ensures that Australia is an active participant in the international exchange of crypto asset tax information and global efforts to deter offshore tax evasion.

Australia's first exchange under the CARF is expected to commence in 2028.

The domestic crypto tax transparency reporting regime

New domestic reporting will enhance transparency and enables the ATO to better support taxpayers in meeting their Australian tax obligations. The implementation of the Domestic Reporting Regime alongside the CARF complements the government's efforts to

strengthen tax transparency and improve the integrity of the tax system.

More information

- Crypto-Asset Domestic Reporting Regime - Consultation
- Crypto asset tax transparency - draft legislation
- 2025–26 Mid-Year Economic and Fiscal Outlook

QC 105985

Reforms to the Register of Foreign Ownership of Australian Assets

Reforms to the Register of Foreign Ownership of Australian Assets.

Last updated 19 May 2026

On 19 May 2026, the Government announced that it would strengthen and streamline Australia's foreign investment framework, including reforms to foreign investment laws and the Register of Foreign Ownership of Australian Assets (the Register).

Existing Register obligations remain in place until these reforms have been implemented.

For more information

- Further streamlining and strengthening the foreign investment framework | Treasury.gov.au
- Australia's foreign investment framework | Foreign investment in Australia

QC 107289

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