



Corporate Income Tax Elections (CT – ELP)

Form CT-ELP instructions are available at <https://www.gov.bm/CIT>

Part A: General Information

1	Name of the Bermuda Constituent Entity	<input type="text"/>
2	Bermuda Constituent Entity Registration Number (if any)	<input type="text"/>
3	Full name of the ultimate parent entity of the MNE Group in which the Bermuda Constituent Entity is a member	<input type="text"/>
4	Type of Constituent Entity:	<input type="checkbox"/> Bermuda Tax Resident Entity <input type="checkbox"/> Bermuda Permanent Establishment
5	Address Details:	
5.a	Street Address	<input type="text"/>
5.b	City	<input type="text"/>
5.c	Parish/State	<input type="text"/>
5.d	Postal Code	<input type="text"/>
5.e	Country	<input type="text"/>
6	Contact Details:	
6.a	Name	<input type="text"/>
6.b	Position	<input type="text"/>
6.c	Email Address	<input type="text"/>
6.d	Phone Number	<input type="text"/>

Part B: Please select the elections that are being made by the Bermuda Constituent Entity pursuant to the Bermuda CIT Act 2023

1 Branch Exemption Election pursuant to **Section 2(1)**?

☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No

1.a If yes, please provide details of each of the permanent establishments to which this election applies below, or alternatively please provide further details on a separate page to be appended to this form.

Name of the Permanent Establishment (Data entry below will be enabled if "Yes" boxes are checked):

(i)

(ii)

(iii)

2 Unclaimed accrual election pursuant to **Section 2(1)**?

☐ Yes (Post-Commencement) ☐ No

2.a If yes, please provide details below for each of the unclaimed accruals to which this election applies and/or provide further details on a separate page to be appended to this form.

Details of unclaimed accruals:

(i)

(ii)

(iii)

3 Election to modify the composition of a Bermuda Constituent Entity Group of which the Bermuda Constituent Entity filing this form is a member, pursuant to **Section 8(3)**?

☐ Yes (Post-Commencement) ☐ No

3.a If yes, please confirm on a separate page, to be appended to this form, the Bermuda Constituent Entities to be included in the Bermuda Constituent Entity Group of which the Bermuda Constituent Entity filing this form is a member and any other details relevant to the election.

4 Election to treat an entity that is less than 80% owned as a Bermuda Constituent Entity pursuant to **Section 9(3)**?

☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No

Part B: Please select the elections that are being made by the Bermuda Constituent Entity pursuant to the Bermuda CIT Act 2023 (Continued)

- 5** Election to treat an entity, that would otherwise be classified as an excluded entity, as a Bermuda Constituent Entity pursuant to **Section 10(3)**?
- ☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No
- 6** Election to treat the segregated accounts of a company registered under the Segregated Accounts Companies Act 2020 as separate Bermuda Constituent Entities pursuant to **Section 15(5)**?
- ☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No
- 6.a** If yes, please provide further details regarding the segregated accounts that should be treated as separate Bermuda Constituent Entities on a separate page to be appended to this form.
- 7** Election to treat a company registered under the Incorporated Segregated Accounts Act 2019 and all of its segregated accounts as one Bermuda Constituent Entity pursuant to **Section 15(6)**?
- ☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No
- 8** Election to determine the financial accounting net income or loss of the Bermuda Constituent Entity in accordance with an approved financial accounting standard pursuant to **Section 21(1)(b)**?
- ☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No
- 8.a** If yes, please identify the approved financial accounting standard:
- 9** Election to reduce the financial accounting net income or loss of the Bermuda Constituent Entity pursuant to **Section 21(6)**?
- ☐ Yes (Post-Commencement) ☐ No
- 10** Election to adjust the taxable income or loss of the Bermuda Constituent Entity for cumulative adjustments attributable to the implementation of IFRS 17 or LDTI pursuant to **Section 29(1)**?
- ☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No
- 11** Election to substitute the amount of stock-based compensation expense recognised in the financial accounts of the Bermuda Constituent Entity pursuant to **Section 30(1)**?
- ☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No
- 12** Election to forego the economic transition adjustment pursuant to **Section 33(8)**?
- ☐ Yes ☐ No
- 13** Election to adjust taxable income or loss of the Bermuda Constituent Entity to exclude unrealised gains or losses on the funds withheld asset pursuant to **Section 34(1)**?
- ☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No

Part B: Please select the elections that are being made by the Bermuda Constituent Entity pursuant to the Bermuda CIT Act 2023 (Continued)

- 14** Election to adjust taxable income or loss of the Bermuda Constituent Entity to exclude unrealised gains or losses on the funds withheld liability pursuant to **Section 34(2)**?

☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No

- 15** Election to determine gains and losses using the realisation principle pursuant to **Section 35(1)**?

☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No

15.a If yes, please provide further details summarising the assets and/or liabilities of the Bermuda Constituent Entity that are the subject of this election on a separate page to be appended to this form.

- 16** Election to apply consolidated accounting treatment to transactions between Bermuda Constituent Entities which are members of the same In Scope MNE Group of which the Bermuda Constituent Entity filing this form is a member, pursuant to **Section 37(4)**?

☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No

- 17** Election to include in the determination of the taxable income or loss of the Bermuda Constituent Entity the change in fair value of its ownership interest in an investment entity or insurance investment entity pursuant to **Section 40(1)**?

☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No

17.a If yes, please provide further details identifying the investment entity(s) or insurance investment entity(s) to which the election applies on a separate page to be appended to this form.

- 18** Election to apply the taxable distribution method with respect to an investment entity or insurance investment entity in which the Bermuda Constituent Entity holds an ownership interest, pursuant to **Section 41(1)**?

☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No

18.a If yes, please provide further details identifying the investment entity(s) or insurance investment entity(s) to which the election applies on a separate page to be appended to this form.

- 19** Election to recognise gain or loss and use of fair value of assets and liabilities pursuant to **Section 45(1)**?

☐ Yes (Post-Commencement) ☐ No

19.a If yes, please provide further details summarising the assets and/or liabilities of the Bermuda Constituent Entity that are the subject of this election and describe the transaction pursuant to which such assets and/or liabilities were acquired on a separate page to be appended to this form.

Part B: Please select the elections that are being made by the Bermuda Constituent Entity pursuant to the Bermuda CIT Act 2023 (Continued)

- 20** Election to treat the transfer of a controlling interest in a Bermuda Constituent Entity as a transfer of such entity's assets and liabilities pursuant to **Section 46(2)**?

☐ Yes (Post-Commencement) ☐ No

- 20.a** If yes, please provide further details summarising the assets and/or liabilities of the Bermuda Constituent Entity that are the subject of this election and describe the transaction pursuant to which the controlling interest was transferred on a separate page to be appended to this form.

Declaration

I declare that I have examined this form (including any accompanying attachments) and, to the best of my knowledge and belief, they are true, correct, and complete. I further declare that I am authorised to make the election on behalf of the Bermuda Constituent Entity.

Signature:

Title:

Date:

Part C: Please select the elections that are being made by the Filing Bermuda Constituent Entity pursuant to the Bermuda CIT Act 2023

- 1** Name of the Filing Bermuda Constituent Entity

- 2** Election to reduce the tax loss carryforward deduction applicable to a fiscal year pursuant to **Section 6(1)(b)**?

☐ Yes (Post-Commencement) ☐ No

- 2.a** If yes, please provide further details regarding the reduction to the tax loss carryforward deduction:

- 3** Election to permanently disregard, in whole or in part, the tax loss carryforward pursuant to **Section 6(6)**?

☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No

**Part C: Please select the elections that are being made by the Filing Bermuda
Constituent Entity pursuant to the Bermuda CIT Act 2023 (Continued)**

- 3.a** If yes, please provide further details regarding the amount of the tax loss carryforward which will be permanently disregarded:

- 4** Election to apply the **De Minimis Exemption** to the Bermuda Constituent Entity Group(s) of the In Scope MNE Group of which the Bermuda Constituent Entity filing this form is a member, pursuant to **Section 7(1)**?

☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No

- 5** Election to treat the MNE Group, of which the Bermuda Constituent Entity filing this form is a member, as an In Scope MNE Group pursuant to **Section 11(8)**?

☐ Yes (Post-Commencement) ☐ No

- 6** Election to vary the fiscal transparency classification of the Bermuda Constituent Entity in respect of which this form is being completed pursuant to **Section 15(1)**?

☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No

- 6.a** If yes, please confirm if the Bermuda Constituent Entity should be regarded as fiscally transparent or not fiscally transparent.

☐ Fiscally Transparent ☐ Not Fiscally Transparent

- 7** Election to establish the fiscal transparency classification of entities in which the Bermuda Constituent Entity filing this form holds an ownership interest, pursuant to **Section 15(1)**?

☐ Yes (Pre-Commencement) ☐ Yes (Post-Commencement) ☐ No

- 7.a** If yes, please provide details on a separate page appended to this form regarding the entity(s) for which the election will be effective and the intended fiscal transparency classification (i.e. fiscally transparent or non-fiscally transparent).

Declaration

I declare that I have examined this form (including any accompanying attachments) and, to the best of my knowledge and belief, they are true, correct, and complete. I further declare that I am authorised to make the election on behalf of the Filing Bermuda Constituent Entity.

Signature:

Title:

Date: