

# BEPS 2.0 - Pillar Two state of play

Global developments summary

Updated: April 9, 2024

### **Notices**

The information herein is not intended to be "written advice concerning one or more Federal tax matters" subject to the requirements of section 10.37(a)(2) of Treasury Department Circular 230.

The information contained herein is of a general nature and based on authorities that are subject to change. Applicability of the information to specific situations should be determined through consultation with your tax adviser.

This document is intended to provide a high-level overview. It does not represent, and should not be viewed as representing, an exhaustive list of the relevant news and developments with respect to the implementation of BEPS 2.0 Pillar Two.



### **Digital Gateway**

#### Pillar Two - state of play

- The BEPS 2.0: state of play tracker has now been moved to our <u>Digital Gateway platform</u>.
- This new tool allows for easier navigation, more detailed status navigation, local contacts, information on local implementation and more.
- Updates will still continue to be made to this tracker in tandem with the new tool.
- Please reach out to your local tax representative to learn more about the Digital Gateway platform and how it can support your organization.



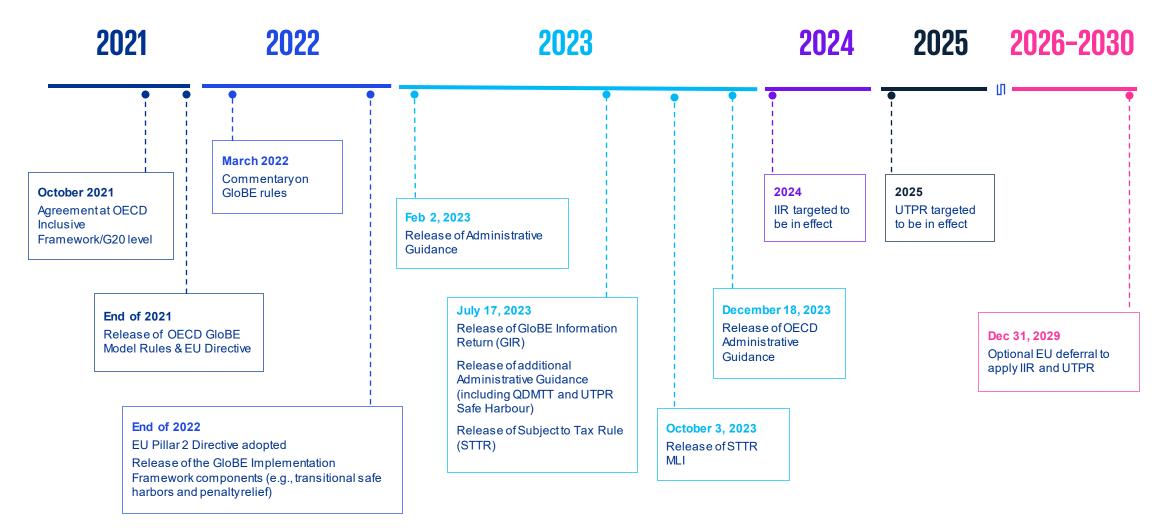




# Timeline

# BEPS 2.0 | Pillar Two - Timeline

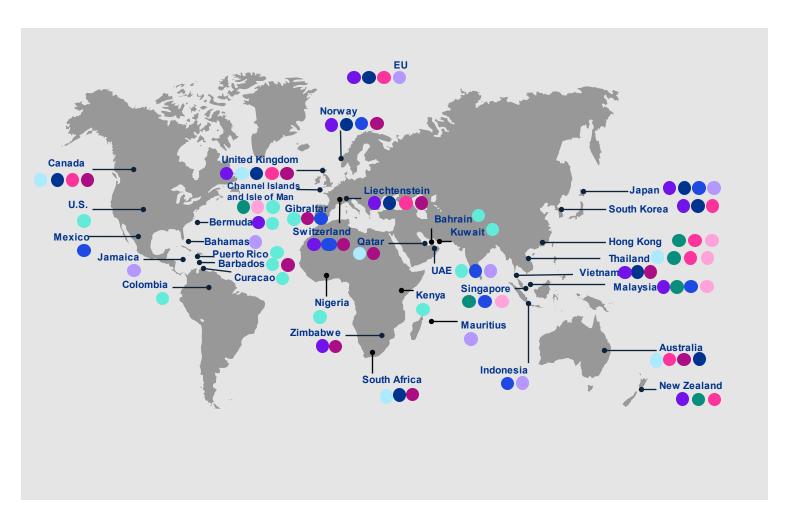






# Announcements

### Pillar Two - Global overview | 1



#### Legend

- Legislation passed/approved
- **QDMTT** (2024)
- Draft legislation released
- QDMTT (2025)

IIR (2024)

Intention to apply QDMTT (timing uncertain)

- IIR (2025)
- Intention to apply IIR and UTPR (timing uncertain)
- UTPR (2024)
- Other related announcement / legislation
- UTPR (2025)



**Contents** 

**Citations** 

Americas







# Pillar Two - Global overview | 2

#### Legislation passed / approved

Vietnam (Dec 2023)

• Lithuania (Oct 23)

• S. Africa (Feb 24)

• Thailand (March 24)

• Qatar (Feb 24)

• Spain (Dec 23)

Zimbabwe (Dec

2023)

- Austria (Dec 2023)
- Belgium (Dec 2023)
- Bulgaria (Dec 2023)
- Croatia (Dec 2023)
- Czech Republic (Dec 2023)
- Denmark (Dec 2023)
- EU Directive (Dec 2022)
- Finland (Dec 2023)
- France (Dec 2023)
- Germany (Dec 2023)
- Greece (April 2024)
- Hungary (Nov 2023)
- Ireland (Dec 2023)
- Italy (Dec 2023)
- Japan IIR (March 2023)
- Liechtenstein (Dec 2023)
- Luxembourg (Dec 2023)
- Malay sia (Dec 2023)
- Malta (Feb 2024)
- Netherlands (Dec 2023)
- New Zealand (March 2024)
- Norway (Jan 2024)
- Romania (Dec 2023)
- Slov akia (Dec 2023)
- Slov enia (Dec 2023)
- South Korea (Dec 2022)
- Sweden (Dec 2023)
- Switzerland DMTT (Dec 2023)
- United Kingdom (June 2023)

#### **Draft legislation released**

- Australia (March 24)
- Canada (Aug 23)
- Cy prus (Oct 23)
- Estonia (Dec 23)
- Latvia (Dec 23)

#### IIR (2024)

- Australia
- Canada
- EU potential deferrals where few **UPEs**

Channel Islands (Guernsey and

Jersey) and Isle of Man

Hong Kong (SAR), China

- Japan
- Liechtenstein
- Norway
- South Africa
- South Korea
- United Kingdom
- Vietnam

IIR (2025)

Malay sia

Singapore

Thailand

New Zealand

#### UTPR (2025)

- Australia
- Canada
- EU potential deferrals where few
- Hong Kong (SAR), China
- Liechtenstein (?)
- New Zealand
- Norway (?)
- South Korea
- Thailand
- United Kingdom

#### **ODMTT (2024)**

Luxembourg

Netherlands

Norway

Qatar (?)

Romania

Slov akia

Slovenia

Spain

Sweden

Vietnam

Zimbabwe

Switzerland

United Kingdom

South Africa

- Austria
- Australia
- Barbados
- Belgium
- Bulgaria
- Canada
- Croatia
- Czech Republic
- Denmark
- Finland
- France
- Germany
- Gibraltar
- Greece
- Hungary
- Ireland
- Italy
- Liechtenstein

- of a CIT as part of its commitment to the
- Bermuda CIT (15%) introduced in response to the OECD Pillar Two initiativ e
- 15% minimum tax
- Curacao Policy measures to address impact of Pillar Two under consideration
- Gibraltar Policy measures to address impact of Pillar Two under consideration
- CIT rate to 15% for certain Pillar Two impacted businesses
- Kenva Plans to review DST and to adopt two-pillar solution
- Kuwait Plans to introduce a 15%
- Nigeria Policy measures to address impact of Pillar Two under consideration
- introduce an election to pay 15% minimum tax
- enacted 15% (not Pillar Two compliant)

#### **ODMTT (2025)**

#### Intention to apply IIR and UTPR (timing uncertain/deferred)

- Estonia (deferral 2030)
- Gibraltar
- Indonesia
- Japan (UTPR)
- Latvia (deferral 2030)
- Lithuania (deferral)
- Malay sia (UTPR) • Malta (deferral 2030)

- Mexico
- Singapore (UTPR)
- Slov akia (deferral)
- Switzerland
- UAE

#### Intention to apply ODMTT (timing uncertain)

#### Other related announcements

- Bahrain Considering the introduction OECD minimum tax
- Barbados Plans to introduce a 9% CIT
- Colombia 2022 tax reform -
- Isle of Man Temporary increase of

- business profit tax
- Puerto Rico Draft legislation aiming to
- UAE new corporate tax 9%
- U.S. corporate alternative minimum tax
- U.S. Republican Committee introduced two bills with UTPR defensive measure



Contents

Citations

**Americas** 

**Europe** 

Middle East

& Africa

# 01 Americas

# Pillar Two - State of play | Americas



#### Legend

- Legislation passed/approved
  - QDMTT (2024)
- Draft legislation released
- QDMTT (2025)

IIR (2024)

Intention to apply QDMTT (timing uncertain)

IIR (2025)

Intention to apply IIR and UTPR (timing uncertain)

UTPR (2024)

Other related legislation / announcement

UTPR (2025)



Contents

**Citations** 







# Pillar Two - State of play | Americas

|             |                               | Income Inclusion | Undertaxed<br>Profits Rule | Domestic Top-up  |   |
|-------------|-------------------------------|------------------|----------------------------|------------------|---|
| Americas    | Status                        | Rule (IIR)       | (UTPR)                     | Tax (QDMTT)      | More information  |
| Bahamas     | Formal indication             | Timing uncertain |                            | 2024?            | Consulting on policy options to comply with Pillar Two  |
| Barbados    | Formal indication             |                  |                            | 2024             | Intention to introduce QDMTT (subject to certain exclusions) and 9% CIT                                 |
| Bermuda     | <u>Legislation</u> enacted    |                  |                            |                  | Legislation enacted to introduce a 15% CIT system for fiscal years starting on or after January 1, 2025 |
| Canada      | Legislative proposal released | 2024             | 2025*                      | 2024             |   |
| Colombia    | Other                         |                  |                            |                  | Corporate minimum tax of 15% adopted. Unclear whether may qualify as QDMTT                              |
| Curacao     | Other                         |                  |                            |                  | Policy measures to address impact of Pillar Two under consideration                                     |
| Jamaica     | Formal indication             |                  |                            | Timing uncertain | Commitment to introducing a QDMTT announced as part of the 2024-2025 budget                             |
| Mexico      | Formal indication             | Timing uncertain | Timing uncertain           | Timing uncertain | Intention to adopt the GloBE rules, including IIR, UTPR and STTR once finalized                         |
| Puerto Rico | Other                         |                  |                            |                  | Draft legislation aiming to introduce an election to pay 15% minimum tax                                |





**Citations** 



Asia Pacific







<sup>\*</sup> UTPR legislation pending



<sup>•</sup> Formal indication - Written document issued by the government stating an intent to implement

<sup>•</sup> E – Legislation deemed "enacted" for accounting purposes

<sup>•</sup> SE - Legislation deemed "substantively enacted" for accounting purposes

# Pillar Two - State of play | Americas

| Americas      | Status | Income Inclusion<br>Rule (IIR) | Undertaxed<br>Profits Rule<br>(UTPR) | Domestic Top-up<br>Tax (QDMTT) | More information  |
|---------------|--------|--------------------------------|--------------------------------------|--------------------------------|---|
| United States | Other  |                                |                                      |                                | <ul> <li>15% Corporate alternative minimum tax (CAMT) adopted (general understanding that CAMT is not an IIR equivalent)</li> <li>May 25, 2023: Republican Committee introduced a bill which would impose an additional 5 percent tax rate each year for four years, on the US income of individuals and entities located in jurisdictions that impose an UTPR. After 4 years the rate would go up to 20 percent.</li> <li>July 19, 2023: Republican members of the Ways and Means Committee introduced a bill entitled the "Unfair Tax Prevention Act," which would increase the BEAT where foreign countries adopt UTPR.</li> </ul> |

Contents



**Citations** 



Asia Pacific







<sup>\*</sup> UTPR legislation pending



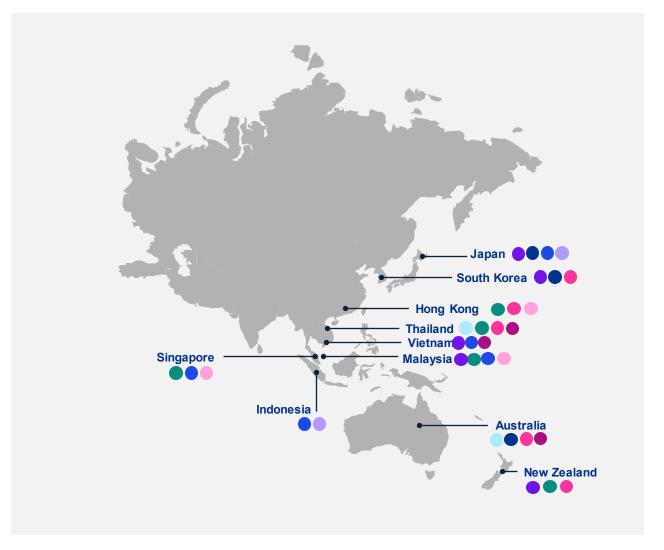
<sup>•</sup> Formal indication – Written document issued by the government stating an intent to implement

<sup>•</sup> E – Legislation deemed "enacted" for accounting purposes

<sup>•</sup> SE – Legislation deemed "substantively enacted" for accounting purposes

# 02 Asia Pacific

# Pillar Two - State of play | Asia Pacific



#### Legend

- Legislation passed/approved
  - QDMTT (2024)
- Draft legislation released
- QDMTT (2025)

IIR (2024)

Intention to apply QDMTT (timing uncertain)

IIR (2025)

Intention to apply IIR and UTPR (timing uncertain)

UTPR (2024)

Other related legislation / announcement

UTPR (2025)



Contents

**Citations** 

Americas





# Pillar Two - State of play | Asia Pacific

| Asia Pacific       | Status  | Income Inclusion<br>Rule (IIR)   | Undertaxed<br>Profits Rule<br>(UTPR) | Domestic Top-up<br>Tax (QDMTT)            | More information                    |
|--------------------|---|----------------------------------|--------------------------------------|---|-------------------------------------|
| Australia          | Consultation on draft legislation ongoing                         | 2024                             | 2025                                 | 2024                                      |                                     |
| Hong Kong<br>(SAR) | Consultation ongoing  | 2025                             | 2025                                 | 2025                                      |                                     |
| Indonesia          | Formal indication   | Timing uncertain                 | Uncertain                            | Timing uncertain                          |                                     |
| Japan              | IIR <u>legislation</u> enacted; draft <u>amendments</u> published | April 2024 <sup>SE23 / E23</sup> | April 2025<br>(estimated)            | Timing uncertain                          | IIR Guidance released December 2023 |
| Malaysia           | <u>Legislation</u> enacted  | 2025 <sup>SE23 / E23</sup>       | Uncertain                            | 2025 <sup>SE23 / E23</sup>                |                                     |
| New Zealand        | Legislation enacted   | 2025 <sup>SE24 / E24</sup>       | 2025 <sup>SE24 / E24</sup>           | Domestic IIR – 2026 <sup>SE24 / E24</sup> |                                     |
| Singapore          | Official plan   | 2025                             | Timing uncertain                     | 2025                                      |                                     |
| South Korea        | Legislation enacted   | 2024 <sup>SE23 / E23</sup>       | 2025 <sup>SE23 / E23</sup>           | Uncertain                                 |                                     |
| Thailand           | Consultation on draft legislation ongoing                         | 2025                             | 2025                                 | 2025                                      |                                     |
| Vietnam            | Resolution adopted*   | 2024                             | Uncertain                            | 2024                                      |                                     |

<sup>\*</sup> Decree/Circular will be issued in 2024 for further detailed guidance and implementation





Citations



**Americas** 







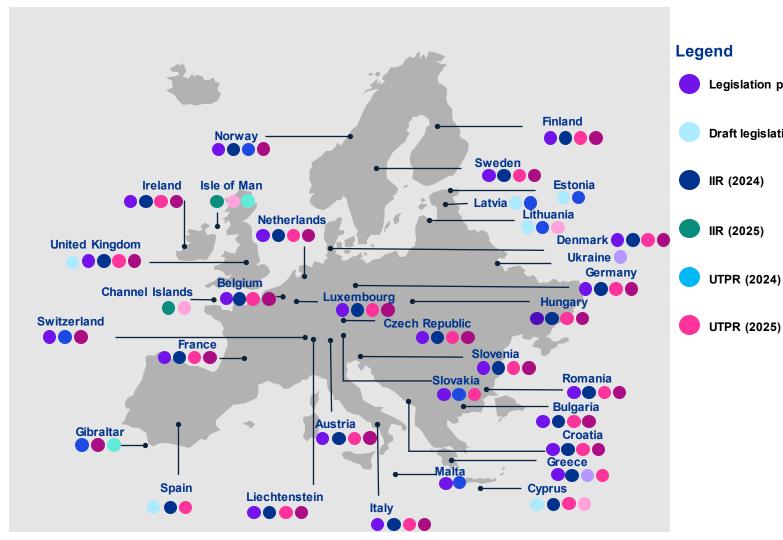


<sup>•</sup> Formal indication - Written document issued by the government stating an intent to implement

<sup>•</sup> **E** – Legislation deemed "enacted" for accounting purposes

<sup>•</sup> SE - Legislation deemed "substantively enacted" for accounting purposes

# Pillar Two - State of play | Europe (EU & non-EU)



Legislation passed/approved

**QDMTT (2024)** 

Draft legislation released

IIR (2024)

(timing uncertain)

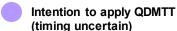
IIR (2025)

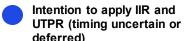
deferred)

UTPR (2024)

announcement

**Americas QDMTT (2025)** 









**Contents** 

**Citations** 



# Pillar Two - State of play | European Union

| European<br>Union   | Status                                 | Income Inclusion<br>Rule (IIR) | Undertaxed<br>Profits Rule<br>(UTPR) | Domestic Top-up<br>Tax (QDMTT) | More information |
|---------------------|--|--------------------------------|--------------------------------------|--------------------------------|------------------|
| <b>EU Directive</b> | <u>Directive adopted</u>               | 2024*                          | 2025*                                | optional                       |                  |
| Austria             | Legislation enacted                    | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Belgium             | Legislation enacted                    | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Bulgaria            | Legislation enacted                    | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Croatia             | Legislation enacted                    | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Cyprus              | Consultation on draft law ended        | 2024                           | 2025                                 | 2025                           |                  |
| Czech<br>Republic   | Legislation enacted                    | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Denmark             | Legislation enacted + draft amendments | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Estonia             | <u>Draft bill released</u>             | Deferred (2030)*               | Deferred (2030)*                     | Uncertain                      |                  |
| Finland             | Legislation enacted                    | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| France              | Legislation enacted                    | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |

<sup>\*</sup> EU Member States are given the option to defer implementation to December 31, 2029 where there are a a maximum of 12 ultimate parent entities (UPEs) based in that jurisdiction (EU countries with likely no more than 12 UPEs include Bulgaria, Croatia, Cyprus, Estonia, Hungary, Latvia, Malta, Romania, Slovenia and Slovakia).

© 2024 KPMG LLP, a Delaware limited liability partnership and a member firm of the KPMG global organization of independent member

**KPMG** 

Contents



Citations



**Americas** 



Asia Pacific





firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved. NDP463723-1A

<sup>•</sup> E23 — Legislation "enacted" for accounting purposes in 2023

<sup>•</sup> **E24** — Legislation "enacted" for accounting purposes in 2024

<sup>•</sup> SE23 — Legislation "substantively enacted" for accounting purposes in 2023

<sup>•</sup> Official plan – Program for implementation with dates

<sup>•</sup> Formal indication – Written document issued by the government stating an intent to implement

<sup>•</sup> **E** – Legislation deemed "enacted" for accounting purposes

<sup>•</sup> SE - Legislation deemed "substantively enacted" for accounting purposes

# Pillar Two – State of play | European Union (*cont.*)

| European<br>Union | Status                     | Income Inclusion<br>Rule (IIR) | Undertaxed<br>Profits Rule<br>(UTPR) | Domestic Top-up<br>Tax (QDMTT) | More information |
|-------------------|----------------------------|--------------------------------|--------------------------------------|--------------------------------|------------------|
| Germany           | Legislation enacted        | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Greece            | Legislation enacted        | 2024                           | 2025                                 | 2024                           |                  |
| Hungary           | Legislation enacted        | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Ireland           | Legislation enacted        | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Italy             | Legislation enacted        | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Latvia            | Draft bill released        | Deferred (2030)*               | Deferred (2030)*                     | Uncertain                      |                  |
| Lithuania         | <u>Draft bill</u> released | Deferred (2030)*               | Deferred (2030)*                     | 2025 or later                  |                  |
| Luxembourg        | Legislation enacted        | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Malta             | Legislation enacted        | Deferred (2030)                | Deferred (2030)                      | Uncertain                      |                  |
| Netherlands       | Legislation enacted        | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Poland            | Formal indication          |                                |                                      |                                |                  |

- **E23** Legislation "enacted" for accounting purposes in 2023
- **E24** Legislation "enacted" for accounting purposes in 2024
- SE23 Legislation "substantively enacted" for accounting purposes in 2023





- Official plan Program for implementation with dates
- Formal indication Written document issued by the government stating an intent to implement
- **E** Legislation deemed "enacted" for accounting purposes
- SE Legislation deemed "substantively enacted" for accounting purposes

Contents



Citations



**Americas** 



Asia Pacific





# Pillar Two – State of play | European Union (*cont.*)

| European<br>Union | Status                                 | Income Inclusion<br>Rule (IIR) | Undertaxed<br>Profits Rule<br>(UTPR) | Domestic Top-up<br>Tax (QDMTT) | More information |
|-------------------|--|--------------------------------|--------------------------------------|--------------------------------|------------------|
| Romania           | Legislation enacted                    | 2024 SE23 / E24                | 2025 SE23 / E24                      | 2024 SE23 / E24                |                  |
| Slovakia          | Legislation enacted                    | Deferred*                      | Deferred*                            | 2024 SE23 / E23                |                  |
| Slovenia          | Legislation enacted                    | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |
| Spain             | <u>Draft bill</u> released             | 2024                           | 2025                                 | 2024                           |                  |
| Sweden            | Legislation enacted + draft amendments | 2024 SE23 / E23                | 2025 SE23 / E23                      | 2024 SE23 / E23                |                  |

Contents



Citations



Americas

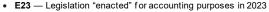


Asia Pacific



**KPMG** 

© 2024 KPMG LLP, a Delaware limited liability partnership and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved. NDP463723-1A



• E24 — Legislation "enacted" for accounting purposes in 2024



<sup>\*</sup> EU Member States are given the option to defer implementation to December 31, 2029 where there are a a maximum of 12 ultimate parent entities (UPEs) based in that jurisdiction (EU countries with likely no more than 12 UPEs include Bulgaria, Croatia, Cyprus, Estonia, Hungary, Latvia, Malta, Romania, Slovenia and Slovakia).

<sup>•</sup> SE23 — Legislation "substantively enacted" for accounting purposes in 2023

<sup>•</sup> Official plan - Program for implementation with dates

<sup>•</sup> Formal indication – Written document issued by the government stating an intent to implement

 $<sup>\</sup>bullet \quad \textbf{E}-\text{Legislation deemed "enacted" for accounting purposes}$ 

<sup>•</sup> SE – Legislation deemed "substantively enacted" for accounting purposes

# Pillar Two - State of play | Europe (non-EU)

| Rest of<br>Europe   | Status   | Income Inclusion<br>Rule (IIR) | Undertaxed Profits<br>Rule (UTPR) | Domestic Top-up<br>Tax (QDMTT) | More information   |
|---------------------|--|--------------------------------|-----------------------------------|--------------------------------|--|
| Channel<br>Islands* | Formal indication  | 2025                           | Uncertain                         | 2025                           |  |
| Gibraltar           | Formal indication  | Timing uncertain               | Timing uncertain                  | 2024                           | Policy measures to address impact of Pillar Two under consideration  |
| Isle of Man         | Other  |                                |                                   |                                | Temporary tax rate increase from 10% to 15% on profits from banking and retail operations in 2024/2025 tax year only (where profits would otherwise be subject to Top-up Tax in other jurisdictions) |
| Liechtenstein       | Legislation enacted ***  | 2024 SE23/E23                  | 2025? SE23 / E23                  | 2024 SE23 / E23                |  |
| Norway              | Legislation enacted  | 2024 SE24/E24                  | 2025?**                           | 2024 SE24/E24                  |  |
| Switzerland         | Ordinance enacted (QDMTT)  | Timing uncertain               | Timing uncertain                  | 2024 SE23 / E23                |  |
| Ukraine             | Formal indication  |                                |                                   | Timing uncertain               |  |
| United<br>Kingdom   | IIR and DMTT <u>legislation</u> enacted; draft UTPR <u>legislation</u> | 2024 SE23 / E23                | 2025                              | 2024 SE23 / E23                |  |



**Contents** 



Citations



Americas



Asia Pacific





<sup>\*</sup> Jersey and Guernsey

<sup>\*\*</sup> UTPR legislation pending

<sup>\*\*\*</sup> Government authorized to set the application start dates by decree

<sup>•</sup> E23 — Legislation "enacted" for accounting purposes in 2023

<sup>•</sup> E24 — Legislation "enacted" for accounting purposes in 2024

<sup>•</sup> SE23 — Legislation "substantively enacted" for accounting purposes in 2023

<sup>•</sup> Official plan - Program for implementation with dates

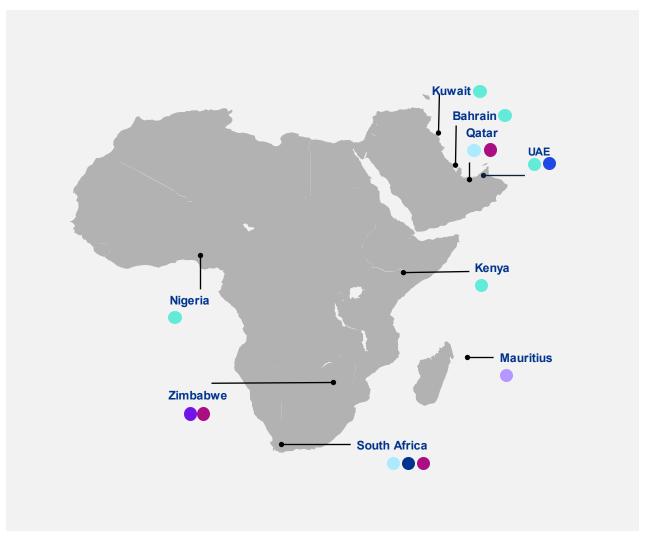
<sup>•</sup> Formal indication - Written document issued by the government stating an intent to implement

<sup>•</sup> E – Legislation deemed "enacted" for accounting purposes

<sup>•</sup> SE - Legislation deemed "substantively enacted" for accounting purposes

# Middle East and Africa

# Pillar Two - State of play | Middle East and Africa



#### Legend

- Legislation passed/approved
- QDMTT (2024)
- Draft legislation released
- QDMTT (2025)

IIR (2024)

Intention to apply QDMTT (timing uncertain)

IIR (2025)

Intention to apply IIR and UTPR (timing uncertain)

UTPR (2024)

Other related legislation / announcement

UTPR (2025)



**Contents** 

**Citations** 

**Americas** 



# Pillar Two - State of play | Middle East and Africa

| Middle East,<br>and Africa | Status   | Income Inclusion<br>Rule (IIR) | Undertaxed<br>Profits Rule<br>(UTPR) | Domestic Top-up<br>Tax (QDMTT) | More information  |
|----------------------------|--|--------------------------------|--------------------------------------|--------------------------------|---|
| ATAF                       | Suggested Approach   |                                |                                      |                                | Guidance for domestic minimum top-up tax implementation released September 29, 2023.        |
| Bahrain                    | Other  |                                |                                      |                                | Introduction of a CIT as part of its commitment to the OECD minimum tax under consideration |
| Kenya                      | Other  |                                |                                      |                                | Plans to adopt two-pillar solution  |
| Kuwait                     | Other  |                                |                                      |                                | Plans to introduce business profit tax at a rate of 15%                                     |
| Mauritius                  | Formal indication  | uncertain                      | uncertain                            | timing uncertain               |   |
| Nigeria                    | Other  |                                |                                      |                                | Considering plan to adopt Pillar two legislation  |
| Qatar                      | Consultation on draft legislation ongoing                    | uncertain                      | uncertain                            | 2024?                          |   |
| South Africa               | Draft GMT and administrative rules released for consultation | 2024                           | uncertain                            | 2024                           |   |
| UAE                        | Public consultation ongoing                                  | Timing uncertain               | Timing uncertain                     | Timing uncertain               | Introduced a 9% corporate income tax  |
| Zimbabwe                   | Legislation enacted  | uncertain                      | uncertain                            | 2024                           |   |



- Official plan Program for implementation with dates
- Formal indication Written document issued by the government stating an intent to implement
- E Legislation deemed "enacted" for accounting purposes
- SE Legislation deemed "substantively enacted" for accounting purposes

Contents



Citations



**Americas** 



Asia Pacific





# Citations

# **Citations by country**

### Contents

#### African Tax Administration Forum (ATAF)

· ATAF Suggested Approach to Drafting Domestic Minimum Top-Up Tax Legislation

#### Austria

• KPMG TaxNewsFlash, Austria: Draft legislation implementing Pillar Two global minimum tax (October 5, 2023)

#### **Australia**

• KPMG TaxNewsFlash, Australia: Consultation on draft legislation implementing Pillar Two global minimum tax rules (March 22, 2024)

#### **Bahrain**

Bahrain; GCC - Bahrain To Introduce Corporate Tax (30 May 2023), News IBFD

#### **Barbados**

• KPMG TaxNewsFlash, <u>Barbados: Proposed rules to implement Pillar Two global minimum tax (</u>November 11, 2023)

#### **Belgium**

KPMG TaxNewsFlash, <u>Belgium: Pillar Two global minimum tax rules adopted by Parliament</u> (December 15, 2023) and KPMG TaxNewsFlash, <u>Belgium: Draft amendments to Pillar Two minimum tax rules</u> (April 8, 2024))

#### Bermuda

KPMG TaxNewsFlash, Bermuda: Legislation introducing corporate income tax signed into law (December 27, 2023)

#### Bulgaria

KPMG EU Tax Centre

#### Canada

KPMG TaxNewsFlash, Canada: Draft legislation includes Pillar Two rules and revised DST and EIFEL rules (August 14, 2023)

#### Croatia

• KPMG TaxNewsFlash, Croatia: Consultation on draft legislation implementing Pillar Two global minimum tax (December 8, 2023)







Asia Pacific









#### Channel Islands and Isle of Man

KPMG TaxNewsFlash, Channel Islands and Isle of Man: Joint statement concerning implementation of Pillar Two global minimum tax (May 19, 2023)

#### **Cyprus**

• KPMG TaxNewsFlash, Cyprus: Draft legislation implementing Pillar Two global minimum tax rules (March 14, 2023)

#### **Czech Republic**

• KPMG TaxNewsFlash, Czech Republic: Legislation introducing top-up tax, implementing EU directive on global minimum tax, now effective (January 17, 2024)

#### Curacao

• Curação - Task Force Holds Consultation on Global Minimum Tax for Multinationals (22 Jan. 2024), News IBFD

#### Denmark

• KPMG TaxNewsFlash, Denmark: Public consultation on draft bill to implement Pillar Two global minimum tax (June 27, 2023)

#### **Estonia**

• KPMG TaxNewsFlash, Estonia: Legislative proposal implementing Pillar Two global minimum tax rules (November 9, 2023)

#### **EU Directive**

- KPMG TaxNewsFlash, <u>EU: EC publishes FAQs on interpretation and transposition of EU global minimum tax</u> (December 22, 2023)
- Council Directive (EU) 2022/2523 of December 14, 2022 on ensuring a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups in the Union

#### **Finland**

• KPMG TaxNewsFlash, Finland: Legislation implementing Pillar Two global minimum tax (March 21, 2024)

#### France

• KPMG TaxNewsFlash, France: Tax-related provisions in finance law for 2024, including Pillar Two rules and transfer pricing documentation changes (January 11, 2024)

**Americas** 



Asia Pacific









Contents

#### Germany

• KPMG TaxNewsFlash, Germany: Law implementing Pillar Two global minimum tax passed by lower house of Parliament (November 14, 2023)

#### Greece

• KPMG TaxNewsFlash, Greece: Proposed legislation implementing Pillar Two global minimum tax (February 28, 2024)

#### Gibraltar

KPMG TaxNewsFlash, Gibraltar: 2023 budget includes consultation on implementation of Pillar Two global minimum tax, stamp duty changes (July 14, 2023)

#### **Hong Kong**

KPMG TaxNewsFlash, Hong Kong: Consultation paper on implementation of Pillar Two global minimum tax (January 2, 2024)

#### Hungary

• KPMG TaxNewsFlash, Hungary: Legislation implementing Pillar Two global minimum tax enacted (December 8, 2023)

#### Indonesia

• Orbitax Tax News & Alerts, Indonesia Government Regulation Includes Authority for Implementing Agreements on Pillar 1 and Pillar 2 (January 30, 2023)

#### Ireland

• KPMG TaxNewsFlash, <u>Ireland: Legislation implementing Pillar Two signed into law (December 19, 2023)</u>

#### Italy

• KPMG TaxNewsFlash, <u>Italy: Pillar Two global minimum tax rules implemented</u> (January 18, 2024)

#### **Jamaica**

• KPMG TaxNewsFlash, <u>Jamaica: Tax measures in 2024-2025 budget including Pillar Twoglobal minimum tax</u> (March 14, 2024)

**Americas** 



Asia Pacific











#### Japan

• KPMG TaxNewsFlash, 2023 tax reform proposals enacted (April 28, 2023); KPMG TaxNewsFlash, Japan: Guidance on income inclusion rule (October 3, 2023); KPMG TaxNewsFlash, Japan: Additional guidance on income inclusion rule (February 5, 2024)

#### Kenya

KPMG TaxNewsFlash, Kenya to adopt two-pillar solution proposed by the OECD (April 20, 2023)

#### Kuwait

KPMG Member Firm in Kuwait

#### Liechtenstein

• KPMG TaxNewsFlash, <u>Liechtenstein: Consultation draft for implementation of Pillar Two global minimum tax</u> (June 8, 2023) and KPMG TaxNewsFlash, <u>Liechtenstein: Guidance on Pillar Two minimum tax rules</u> (April 8, 2024)

#### Lithuania

• Lithuanian MOF Previews Pillar 2 Tax Adoption Plan, 2023 TNTI 173-9 (September 11, 2023)

#### Luxembourg

• KPMG TaxNewsFlash, <u>Luxembourg: Law implementing Pillar Two global minimum tax enacted</u> (December 20, 2023); KPMG TaxNewsFlash, <u>Luxembourg: Guidance under Pillar Two law relating to inclusion of deferred tax assets and liabilities in computing effective tax rate</u> (March 28, 2024)

#### Malaysia

• KPMG TaxNewsFlash, Malaysia: Tax proposals in 2024 budget (October 13, 2023)

#### Malta

• KPMG TaxNewsFlash, Malta: Legislation implementing Pillar Two global minimum tax (February 28, 2024) and KPMG TaxNewsFlash, Malta: Guidance on implementation of Pillar Two global minimum tax (March 14, 2024)

#### **Mauritius**

KPMG TaxNewsFlash, Tax proposals in budget for 2023, including domestic minimum top-up tax (June 29, 2022)



**Americas** 



Asia Pacific







#### Mexico

KPMG TaxNewsFlash, <u>BEPS 2.0 implementation considerations for Mexico</u> (May 5, 2022)

#### **Netherlands**

KPMG TaxNewsFlash, Netherlands: 2024 Tax Plan package and law implementing Pillar Two global minimum tax enacted (December 20, 2023)

#### **New Zealand**

• KPMG TaxNewsFlash, Consultation on implementation of Pillar Two rules (May 6, 2022) and KPMG TaxNewsFlash, New Zealand: May 2023 Tax Bill includes Pillar Two global minimum tax rules (May 22, 2023)

#### Norway

KPMG TaxNewsFlash, Norway: Draft legislation implementing Pillar Two minimum tax (June 16, 2023)

#### **Poland**

KPMG TaxNewsFlash, Poland: Bill implementing Pillar Two global minimum tax (March 5, 2024)

#### **Qatar**

• KPMG TaxNewsFlash, <u>Amendment of transfer pricing-related provisions of Income Tax Law for 2018</u> (February 6, 2023

#### Romania

KPMG EU Tax Centre

#### **Singapore**

• KPMG TaxNewsFlash, Singapore: Tax measures in budget 2024 include Pillar Two global minimum tax rules (February 20, 2024)

#### **South Africa**

• KPMG TaxNewsFlash, South Africa: Draft legislation implementing Pillar Two global minimum tax (February 28, 2024)

#### **South Korea**

• KPMG TaxNewsFlash, Korea: Tax reform proposal for 2023, changes to Pillar Two and transfer pricing documentation rules (August 10, 2023), KPMG TaxNewsFlash, Korea: Proposed amendments to transfer pricing and Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules enacted are proposed amendments to transfer pricing and Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules enacted are proposed amendments to Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules enacted are proposed amendments to transfer pricing and Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules enacted are proposed amendments to transfer pricing and Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules enacted are proposed amendments to transfer pricing and Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules enacted are proposed amendments to transfer pricing and Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules enacted are proposed amendments to transfer pricing and Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules enacted are proposed amendments to transfer pricing and Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments to Pillar Two rules (August 21, 2023) and KPMG TaxNewsFlash, Korea: Amendments (August 21,

**Americas** 



Asia Pacific









#### **Spain**

KPMG TaxNewsFlash, Spain: Draft legislation implementing Pillar Two global minimum tax (February 9, 2024)

#### Slovakia

• KPMG TaxNewsFlash, Slovakia: Legislation implementing Pillar Two global minimum tax passed by Parliament (February 23, 2024)

#### Slovenia

KPMG member firm in Slovenia

#### Sweden

KPMG TaxNewsFlash, Interim report on implementation of EU global minimum tax directive (February 8, 2023), KPMG TaxNewsFlash, Sweden: Draft law implementing Pillar Two global minimum tax (September 18, 2023) and KPMG TaxNewsFlash, Sweden: Draft amendments to Pillar Two minimum tax rules (April 8, 2024)

#### **Switzerland**

• KPMG TaxNewsFlash, Switzerland: Consultation on draft law implementing Pillar Two global minimum tax (June 6, 2023)

#### **Thailand**

KPMG TaxNewsFlash, Measures to support implementation of Pillar Two global minimum tax rules (March 14, 2023)

#### **United Arab Emirates**

• KPMG TaxNewsFlash, Interim report on implementation of EU global minimum tax directive (April 8, 2024)

#### **United Kingdom**

• KPMG TaxNewsFlash, Finance Bill: The UK legislates for Pillar Two minimum taxation (April 3, 2023) and KPMG Member Firm in the UK; KPMG TaxNewsFlash, UK: Updates on Pillar Two, including draft HMRC guidance on proposed rules (January 16, 2024); KPMG TaxNewsFlash, UK: Finance Act 2024 includes amendments to Pillar Two minimum tax rules (March 15, 2024)

**Americas** 



Asia Pacific











#### **United States**

- KPMG TaxNewsFlash, Ways and Means Chairman introduces bill that would impose additional tax on foreign jurisdictions with UTPR (May 25, 2023)
- KPMG TaxNewsFlash, Ways and Means Republicans introduce bill to increase BEAT where countries adopt UTPR (July 19, 2023)

#### Vietnam

• KPMG TaxNewsFlash, Vietnam: Resolution adopting Pillar Two global minimum tax (November 29, 2023)

#### **Z**imbabwe

- KPMG TaxNewsFlash, Zimbabwe: Tax measures in 2024 budget (November 30, 2023)
- Zimbabwe Finance Act 2024: Zimbabwe Enacts Domestic Minimum Top-Up Tax Rules (20 Feb. 2024), News IBFD

**Americas** 



Asia Pacific











Some or all of the services described herein may not be permissible for KPMG audit clients and their affiliates or related entities.



kpmg.com/socialmedia

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

© 2024 KPMG LLP, a Delaware limited liability partnership and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved. NDP463723-1A

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.