



BEPS 2.0: state of play

KPMG Global Tax & Legal | 12 April 2024

This document is intended to provide a high-level overview of administrative and legislative developments in jurisdictions around the world related to the implementation of Pillar Two of the OECD's BEPS 2.0 project. It does not represent, and should not be viewed as representing an exhaustive listing of the relevant news and developments with respect to the implementation of BEPS 2.0 — Pillar Two.

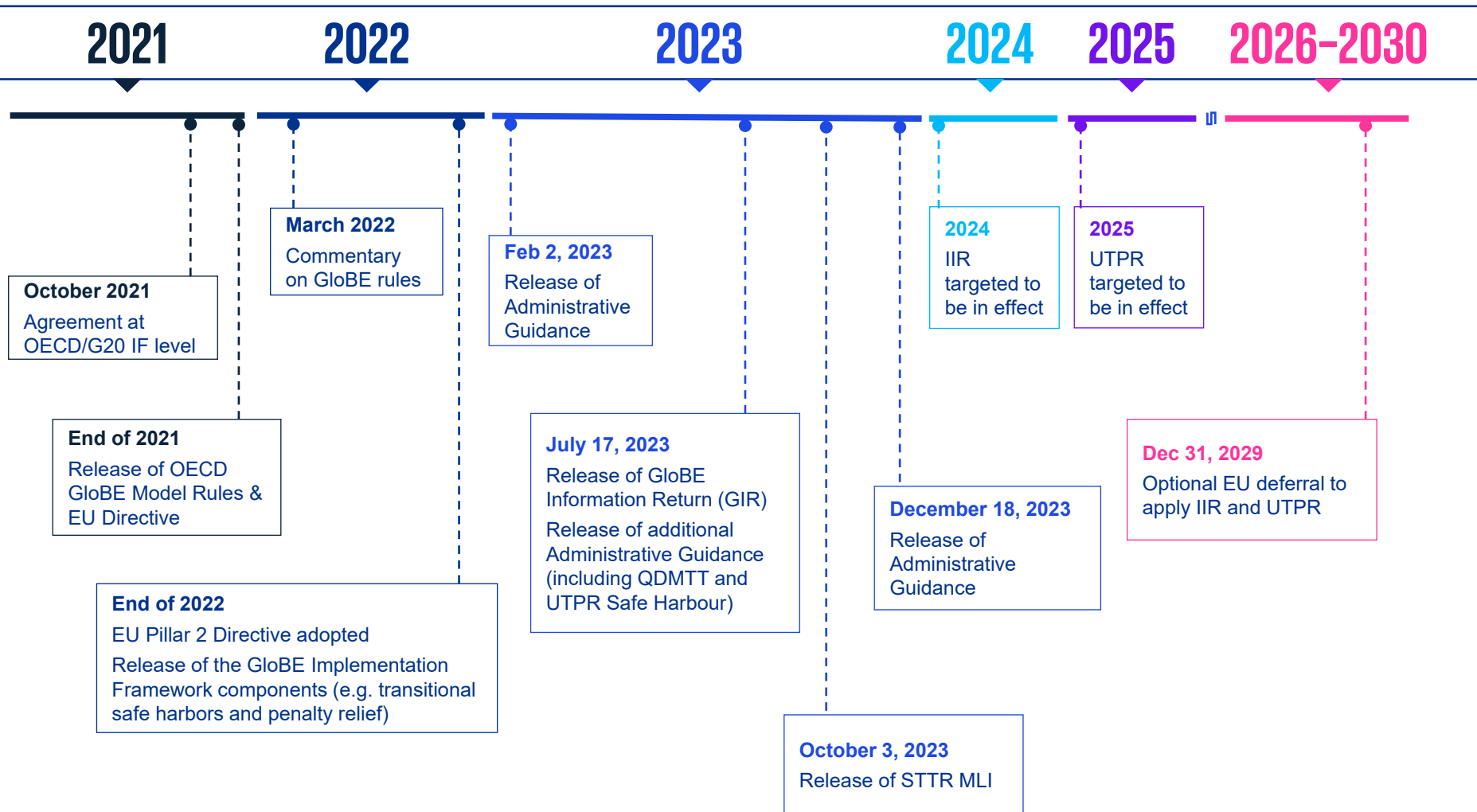
This document should not be viewed as tax advice or an opinion or as accounting advice or an opinion, and it should not be relied upon for penalty protection or for any other purpose except achieving general familiarity with the subject matter thereof.

Pillar Two – state of play

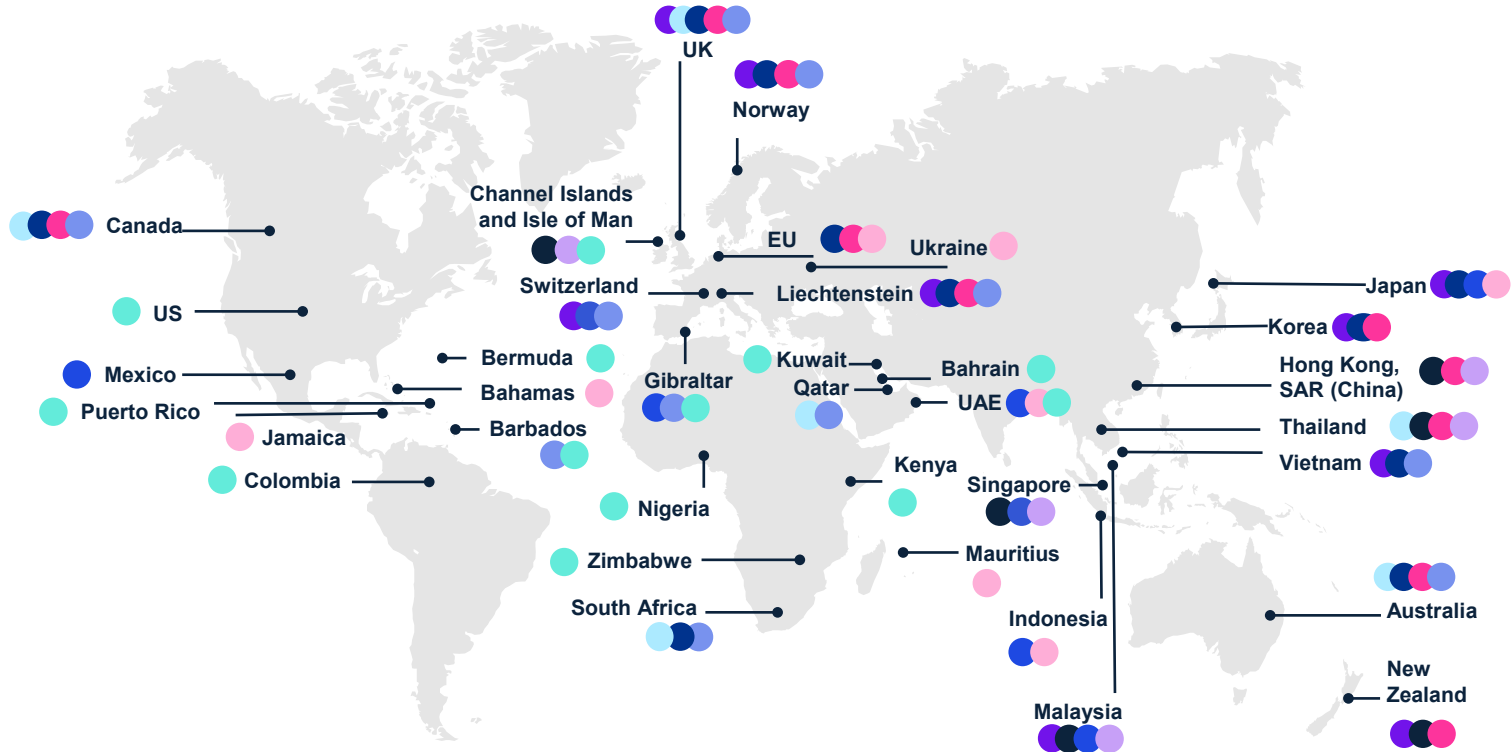
- The BEPS 2.0: state of play tracker has now been moved to our [Digital Gateway platform](#).
- This new tool allows for easier navigation, more detailed status navigation, local contacts, information on local implementation and more.
- Updates will still continue to be made to this tracker in tandem 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 and global overview

BEPS 2.0 | Pillar Two – Timeline



Pillar Two — Global overview | 1



Legend

- Legislation passed/approved
- Draft legislation released
- IIR (2024)
- IIR (2025)
- UTPR (2025)
- Intention to apply IIR/UTPR (timing uncertain or deferred)
- DMTT (2024)
- DMTT (2025)
- Intention/option to apply DMTT (timing uncertain)
- Other related legislation/announcement

Pillar Two — Global overview | 2

Legislation passed/approved

- Austria (Dec 2023)
- Belgium (Dec 2023)
- Bulgaria (Dec 2023)
- Croatia (Dec 2023)
- Czech Republic (Dec 2023)
- Denmark (Dec 2023)
- EU Directive (Dec 2022)
- Estonia (April 2024)
- 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)
- Korea (Dec 2022)
- Liechtenstein (Dec 2023)
- Luxembourg (Dec 2023)
- Malaysia (Dec 2023)
- Malta (Feb 2024)
- Netherlands (Dec 2023)
- New Zealand (March 2024)
- Norway (Jan 2024)
- Romania (Dec 2023)
- Slovakia (Dec 2023)
- Slovenia (Dec 2023)
- Sweden (Dec 2023)
- Switzerland – DMTT (Dec 2023)
- United Kingdom (June 2023)
- Vietnam (Dec 2023)

Draft legislation

- Australia (March 2024)
- Canada (Aug 2023)
- Cyprus (Oct 2023)
- Latvia (Dec 2023)
- Lithuania (Oct 2023)
- Qatar (Feb 2024)
- South Africa (Feb 2024)
- Spain (Dec 2023)
- Thailand (March 2024)

DMTT (2024)

- Austria
- Australia
- Barbados
- Belgium
- Bulgaria
- Canada
- Croatia
- Czech Republic
- Denmark
- Finland
- France
- Germany
- Gibraltar
- Greece
- Hungary
- Ireland
- Italy
- Liechtenstein
- Luxembourg
- Netherlands
- Norway
- Qatar (?)
- Romania
- Slovakia
- Slovenia
- South Africa
- Spain
- Sweden
- Switzerland
- United Kingdom
- Vietnam

DMTT (2025)

- Cyprus
- Guernsey
- Isle of Man
- Jersey
- Hong Kong (SAR), China
- Lithuania
- Malaysia
- Singapore
- Thailand

Intention to apply DMTT (timing uncertain)

- Bahamas
- EU (optional)
- Indonesia
- Jamaica
- Japan
- Mauritius
- UAE
- Ukraine

IIR (2024)

- Australia
- Canada
- EU*
- Japan
- Korea
- Liechtenstein
- Norway
- South Africa
- United Kingdom
- Vietnam

IIR (2025)

- Guernsey
- Hong Kong (SAR), China
- Isle of Man
- Jersey
- Malaysia
- New Zealand**
- Singapore
- Thailand

UTPR (2025)

- Australia
- Canada
- EU*
- Hong Kong (SAR), China
- Korea
- Liechtenstein (?)
- New Zealand
- Norway (?)
- Thailand
- United Kingdom

Intention to apply IIR and UTPR (timing uncertain or deferred)
















- Estonia (deferral / 2030)
- Gibraltar
- Indonesia
- Japan (UTPR)
- Latvia (deferral / 2030)
- Lithuania (deferral)
- Malaysia (UTPR)
- Malta (deferral / 2030)
- Mexico
- Singapore (UTPR)
- Slovakia (deferral)
- Switzerland
- UAE

* Option to defer implementation to 31 December 2029 in case of max. 12 UPEs

** Domestic IIR from 2026

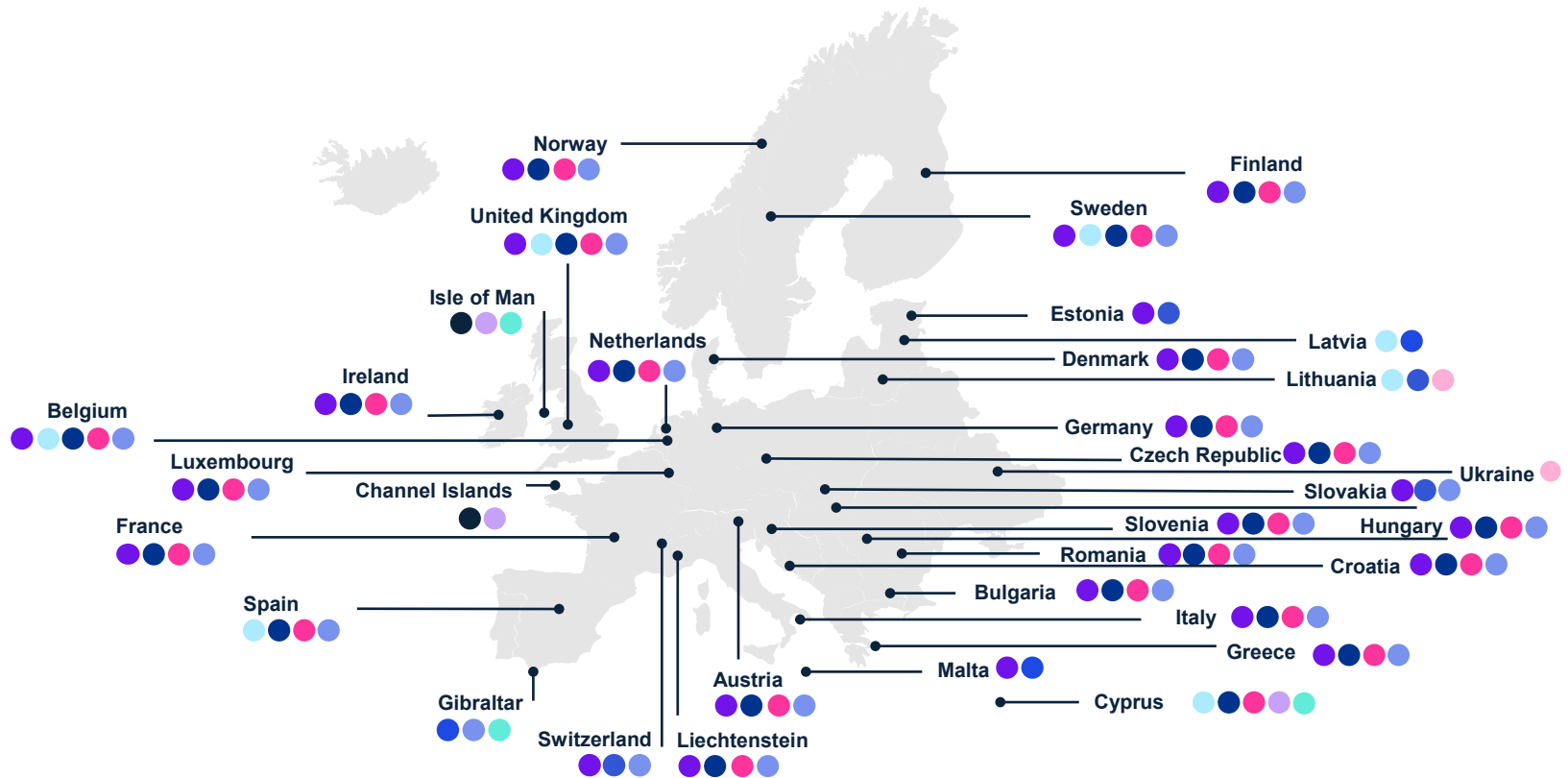
Pillar Two — Global overview | 3

Other related announcements

Bahrain 	▶ Considering the introduction of a CIT as part of its commitment to the OECD minimum tax	Kuwait 	▶ Plans to introduce business profit tax at a rate of 15%
Barbados 	▶ Plans to introduce a 9% CIT rate	Nigeria 	▶ Policy measures to address impact of Pillar Two under consideration
Bermuda 	▶ CIT (15%) introduced in response to the OECD Pillar Two initiative	Puerto Rico 	▶ Draft legislation aiming to introduce an election to pay 15% minimum tax
Colombia 	▶ 2022 tax reform — 15 percent minimum tax	UAE 	▶ New corporate tax 9 percent
Curacao 	▶ Policy measures to address impact of Pillar Two under consideration	US 	▶ Corporate alternative minimum tax enacted 15 percent (not Pillar 2 compliant)
Gibraltar 	▶ Policy measures to address impact of Pillar Two under consideration	US 	▶ Republican Committee introduced two bills with UTPR defensive measure
Isle of Man 	▶ Temporary increase of CIT rate to 15% in relation to certain P2 impacted businesses	Zimbabwe 	▶ Domestic Minimum Top-up Tax (design and mechanics not aligned with GloBE rules)
Kenya 	▶ Plans to review DST and to adopt two-pillar solution		

Europe

Pillar Two — State of play | Europe



Legend

- Legislation passed/approved
- Draft legislation released
- IIR (2024)
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- DMTT (2024)
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- Intention/option to apply DMTT (timing uncertain)
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Pillar Two — State of play | European Union (1|3)

European Union	Status	Income Inclusion Rule (IIR)	Undertaxed Profits Rule (UTPR)	Domestic Top-up Tax (DMTT)	More information
EU	<u>Directive</u> adopted	2024*	2025*	optional	<u>EU Tax Centre alert - domestic implementation summary</u>
Austria	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u> <u>EU Tax Centre alert</u>
Belgium	<u>Legislation</u> enacted + draft <u>amendments</u>	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u> <u>EU Tax Centre alert</u>
Bulgaria	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	
Croatia	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>EU Tax Centre alert</u>
Cyprus	Consultation on <u>draft law</u> ended	2024	2025	2025	<u>Local tax alert</u> <u>EU Tax Centre alert</u>
Czech Republic	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u>
Denmark	<u>Legislation</u> enacted + draft <u>amendments</u>	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u> <u>EU Tax Centre alert</u>

*Option to defer implementation to 31 December 2029 in case of max. 12 UPEs (this option was exercised by *Estonia, Latvia Lithuania, Malta, and Slovakia*). In addition, *Cyprus, Greece, Poland, Portugal and Spain* have missed the transposition deadline (Dec 31, 2023). It remains to be seen whether the rules will apply retroactively once implemented.

- **E23** — Legislation “enacted” for accounting purposes in 2023
- **SE23** — Legislation “substantively enacted” for accounting purposes in 2023

Pillar Two — State of play | European Union (2|3)

European Union	Status	Income Inclusion Rule (IIR)	Undertaxed Profits Rule (UTPR)	Domestic Top-up Tax (DMTT)	More information
Estonia	<u>Legislation</u> adopted by Parliament	Deferred (2030)	Deferred (2030)	uncertain	<u>EU Tax Centre alert</u>
Finland	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u>
France	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u>
Germany	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u> <u>EU Tax Centre alert</u>
Greece	<u>Legislation</u> enacted	2024 SE24 / E24	2025 SE24 / E24	2024 SE24 / E24	<u>EU Tax Centre alert</u>
Hungary	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u> <u>EU Tax Centre alert</u>
Ireland	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u>
Italy	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u>
Latvia	Draft bill <u>released</u>	Deferred (2030)	Deferred (2030)	uncertain	<u>EU Tax Centre alert</u>
Lithuania	<u>Draft bill</u> submitted to Parliament	Deferred	Deferred	2025 or later	<u>EU Tax Centre alert</u>

- **E23** — Legislation “enacted” for accounting purposes in 2023
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- **E24** — Legislation “enacted” for accounting purposes in 2024
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Pillar Two — State of play | European Union (3|3)

European Union	Status	Income Inclusion Rule (IIR)	Undertaxed Profits Rule (UTPR)	Domestic Top-up Tax (DMTT)	More information
Luxembourg	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u> <u>EU Tax Centre alert</u>
Malta	<u>Legislation</u> enacted	Deferred (2030)	Deferred (2030)	uncertain	<u>Local tax alert</u> <u>EU Tax Centre alert</u>
Netherlands	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u> <u>EU Tax Centre alert</u>
Romania	<u>Legislation</u> enacted	2024 SE23 / E24	2025 SE23 / E24	2024 SE23 / E24	<u>Local tax alert</u>
Slovakia	<u>Legislation</u> enacted	Deferred	Deferred	2024 SE23 / E23	<u>Local tax alert</u>
Slovenia	<u>Legislation</u> enacted	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>EU Tax Centre alert</u>
Spain	<u>Draft bill</u> released	2024	2025	2024	<u>EU Tax Centre alert</u>
Sweden	<u>Legislation</u> enacted + draft <u>amendments</u>	2024 SE23 / E23	2025 SE23 / E23	2024 SE23 / E23	<u>Local tax alert</u> <u>EU Tax Centre alert</u>
Cyprus	<u>Other</u>	Consent to IF agreement on transitional CbyC Safe Harbor, transitional UTPR Safe Harbour and QDMTT Safe Harbour — see <u>EU Tax Centre alert</u>			

- **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

Pillar Two — State of play | Europe (outside EU)

Rest of Europe	Status	Income Inclusion Rule (IIR)	Undertaxed Profits Rule (UTPR)	Domestic Top-up Tax (DMTT)	More information
United Kingdom	<u>Legislation enacted</u> ; draft UTPR <u>legislation</u>	2024 SE23 / E23	2025	2024 SE23 / E23	Local tax alerts (<u>April 2023</u> ; <u>July 2023</u> ; <u>September 2023</u> ; <u>December 2023</u>) <u>EU Tax Centre alert</u>
Liechtenstein	<u>Legislation enacted</u> **	2024 SE23 / E23	2025? SE23 / E23	2024 SE23 / E23	Local tax alert <u>EU Tax Centre alert</u>
Norway	<u>Legislation enacted</u>	2024 SE24 / E24	2025?*	2024 SE24 / E24	Local tax alert <u>EU Tax Centre alert</u>
Switzerland	Ordinance <u>enacted</u> - (DMTT)	timing uncertain	timing uncertain	2024 SE23 / E23	Local tax alert
Channel Islands*** and Isle of Man	<u>Formal indication</u>	2025	uncertain	2025	<u>Tax News Flash</u>
Gibraltar	<u>Formal indication</u>	timing uncertain	timing uncertain	2024	<u>EU Tax Centre alert</u>
Ukraine	<u>Formal indication</u>			timing uncertain	
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) – see <u>local tax alert</u>			

* UTPR legislation pending

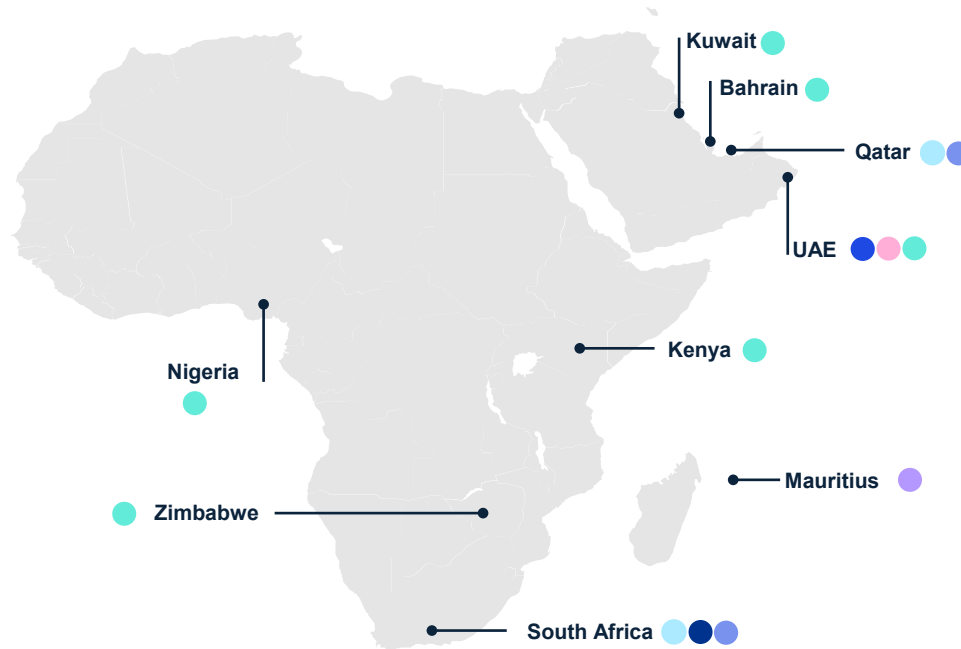
** Government authorized to set the application start dates by decree

*** Guernsey and Jersey

- **Official plan** — Program for implementation with dates
- **Formal indication** — Written document issued by the government stating an intent to implement
- **E23** — Legislation “enacted” for accounting purposes in 2023
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- **SE23** — Legislation “substantively enacted” for accounting purposes in 2023
- **SE24** — Legislation “substantively enacted” for accounting purposes in 2024

Middle East and Africa

Pillar Two — State of play | Middle East and Africa



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- Legislation passed/approved
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Pillar Two — State of play | Middle East and Africa

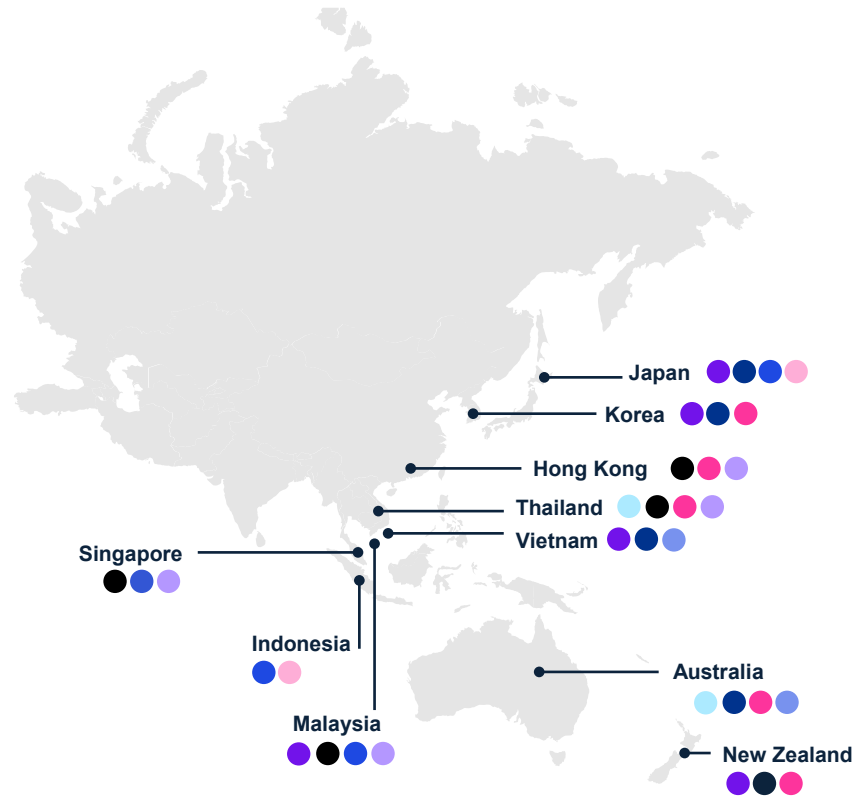
Middle East & Africa	Status	Income Inclusion Rule (IIR)	Undertaxed Profits Rule (UTPR)	Domestic Top-up Tax (DMTT)	More information
Mauritius	Formal Indication	uncertain	uncertain	timing uncertain	Local tax alert
Qatar	Consultation on draft legislation ongoing	uncertain	uncertain	2024?	
South Africa	Draft GMT and administrative rules released	2024	uncertain	2024	EU Tax Centre alert Local tax alert
UAE	Public consultation ongoing	timing uncertain	timing uncertain	timing uncertain	EU Tax Centre alert
ATAF**	Other	Guidance for domestic minimum top-up tax implementation – see EU Tax Centre alert			
Bahrain	Other	Introduction of a CIT as part of its commitment to the OECD minimum tax under consideration – see Local tax alert			
Kenya	Other	Plans to review DST and to adopt two-pillar solution – see EU Tax Centre alert			
Kuwait	Other	Plans to introduce business profit tax at a rate of 15% – see local tax alert			
Nigeria	Other	Policy measures to address impact of Pillar Two under consideration – see EU Tax Centre alert			
Zimbabwe	Other	DMTT legislation enacted and applicable from 2024. It appears that the DMTT design and mechanics are not aligned with GloBE rules (but guidelines are yet to be issued)			

* African Tax Administration Forum

- **Official plan** — Program for implementation with dates
- **Formal indication** — Written document issued by the government stating an intent to implement

Asia Pacific

Pillar Two — State of play | Asia Pacific



Legend

- Legislation passed/approved
- Draft legislation released
- IIR (2024)
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- UTPR (2025)
- Intention to apply IIR/UTPR (timing uncertain or deferred)
- DMTT (2024)
- DMTT (2025)
- Intention/option to apply DMTT (timing uncertain)
- Other related legislation/announcement

Pillar Two — State of play | Asia Pacific

Asia Pacific	Status	Income Inclusion Rule (IIR)	Undertaxed Profits Rule (UTPR)	Domestic Top-up Tax (DMTT)	More information
Australia	Consultation on <u>draft legislation</u> ongoing	2024	2025	2024	<u>Local tax alert</u>
Hong Kong (SAR)	<u>Consultation</u> ongoing	2025	2025	2025	<u>Local tax alert</u>
Indonesia	Formal indication	timing uncertain	uncertain	timing uncertain	
Japan	IIR <u>legislation</u> + <u>amendments</u> enacted	April 2024 ^{SE23 / E23}	April 2025 (estimated)	timing uncertain	Local tax alerts (<u>June 2023</u> ; <u>Oct 2023</u> ; <u>Dec 2023</u>)
Korea	Legislation enacted	2024 ^{SE23 / E23}	2025 ^{SE23 / E23}	uncertain	Local tax alert (<u>Jan 2024</u> ; <u>April 2024</u>)
Malaysia	<u>Legislation</u> enacted	2025 ^{SE23 / E23}	uncertain	2025 ^{SE23 / E23}	<u>Local tax alert</u>
New Zealand	<u>Legislation</u> enacted	2025 ^{SE24 / E24}	2025 ^{SE24 / E24}	Domestic IIR – 2026 ^{SE24 / E24}	<u>Local tax alert</u>
Singapore	Official Plan	2025	timing uncertain	2025	<u>Local tax alert</u>
Thailand	<u>Consultation</u> on draft legislation ongoing	2025	2025	2025	<u>Local tax alert</u>
Vietnam	Resolution adopted*	2024 ^{SE23 / E23}	uncertain	2024 ^{SE23 / E23}	<u>Local tax alert</u>

* Decree/Circular will be issued in third quarter of 2024 for further detailed guidance and implementation

- **Official plan** — Program for implementation with dates
- **Formal indication** — Written document issued by the government stating an intent to implement

- **E23** — Legislation “enacted” for accounting purposes in 2023
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- **SE24** — Legislation “substantively enacted” for accounting purposes in 2024

Americas

Pillar Two — State of play | Americas



Legend

- Legislation passed/approved
- Draft legislation released
- IIR (2024)
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- Intention to apply IIR/UTPR (timing uncertain or deferred)
- DMTT (2024)
- DMTT (2025)
- Intention/option to apply DMTT (timing uncertain)
- Other related legislation/announcement

Pillar Two — State of play | Americas

Americas	Status	Income Inclusion Rule (IIR)	Undertaxed Profits Rule (UTPR)	Domestic Top-up Tax (DMTT)	More information
Canada	Legislative proposal released	2024	2025*	2024	Local tax alert
Bahamas	Formal indication	timing uncertain		2024?	
Barbados	Formal indication			2024	Local tax alert
Jamaica	Formal indication	Commitment to introducing a QDMTT announced as part of the 2024-2025 (timing uncertain) – see KPMG’s Tax News Flash			
Mexico	Formal indication	Intention to adopt the GloBE Rules, including IIR, UTPR and STTR once finalized (timing uncertain) – See KPMG’s Tax News Flash			
Bermuda	Other	Legislation enacted to introduce a CIT system (15 percent) for fiscal years starting on or after January 1, 2025 – see a local tax alert and KPMG’s Tax News Flash			
Colombia	Other	Corporate minimum tax of 15 percent adopted. Unclear whether may qualify as QDMTT			
Curacao	Other	Policy measures to address impact of Pillar Two under consideration			
Puerto Rico	Other	Draft legislation aiming to introduce an election to pay 15% minimum tax			
United States	Other	<p>Corporate alternative minimum tax of 15 percent adopted (general understanding that CAM-T is not IIR equivalent)</p> <p><i>May 25, 2023:</i> 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 – see KPMG’s Tax News Flash</p> <p><i>July 19, 2023:</i> 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 – see KPMG’s Tax News Flash</p>			

* UTPR legislation pending

- **Official plan** — Program for implementation with dates
- **Formal indication** — Written document issued by the government stating an intent to implement

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