



OECD new releases on Amount A Pillar 1 and Subject-to-Tax Rule

Find out how the impact from Amount A and Subject-to-Tax Rule (STTR) will radiate

Tax Alert Issue 15: OECD released substantial documents on Amount A and STTR

On 11 October 2023, the Organisation for Economic Cooperation and Development (OECD) released the text of a new Multilateral Convention to Implement Amount A of Pillar One (MLC) that updates the international tax framework to co-ordinate a reallocation of tax rights to market jurisdictions, improve tax certainty and remove digital service taxes.

The MLC was accompanied by an Explanatory Statement, an Understanding on the Application of Certainty of Amount A and an Overview, together with a new analysis of the financial impacts of Amount A.

Previously on 3 October 2023, the OECD released a new Multilateral Convention to Facilitate the Implementation of the Pillar Two Subject to Tax Rule (STTR), which is open for signature to facilitate updates across the global network of bilateral tax treaties for STTR provisions.

Find out more on the initial observations and analysis of both the new Multilateral Conventions in our KPMG report [here](#).

For the latest updates on Singapore's tax landscape, [click here](#).



[Ajay K Sanganeria](#)

Partner
Head of Tax
KPMG in Singapore



[Harvey Koenig](#)

Partner
Energy & Natural
Resources,
Telecommunications,
Media & Technology,
Tax
KPMG in Singapore



[Andy Baik](#)

Partner
Real Estate & Asset
Management, Tax
KPMG in Singapore



[Yong Sing Yuan](#)

Partner
Transfer Pricing
KPMG in Singapore

Singapore Tax Firm of the Year – International Tax Review Asia-Pacific Tax Awards 2022, 2023
Singapore Tax Disputes Firm of the Year – International Tax Review Asia-Pacific Tax Awards 2021, 2022, 2023
Singapore Tax Policy Firm of the Year – International Tax Review Asia-Pacific Tax Awards 2023
Regional Tax Compliance and Reporting Firm of the Year – International Tax Review Asia-Pacific Tax Awards 2023
Diversity & Inclusion Firm of the Year – International Tax Review Asia-Pacific Tax Awards 2023

For more information, please [view our tax services page](#).



[Privacy](#) | [Legal](#)

You have received this message from KPMG in Singapore. If you wish to unsubscribe from all KPMG Singapore commercial electronic messages, please click [HERE](#).

12 Marina View #15-01 Asia Square Tower 2 Singapore 018961

© 2023 KPMG Services Pte. Ltd. (Registration No: 200003956G), a Singapore incorporated company 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.

The KPMG name and logo are registered trademarks or trademarks of KPMG International.