

GloBE Intended Adoption

As at 15 February 2023 — Estimates only

A. Income Inclusion Rule (IIR)

44	EU Directive & likely 12+ in-scope MNEs ^(n1&2)		Other firm indications		Some indication	EU likely < 12 MNEs
	2024 ⁿ³ (16)		2024 & 2025 (12)		2024+ (5)	2025–2030 (11)
	Austria (AT)	Ireland (IE)	Australia (AU)	Qatar (QA)	Canada (CA)	Bulgaria (BG)
	Belgium (BE)	Italy (IT)	Hong Kong (HK)	Switzerland (CH) (DL)	Mauritius (MU)	Croatia (HR)
	Czech Rep (CZ)	Luxembourg (LX)	Indonesia (ID)	UAE (AE)	Mexico (MX)	Cyprus (CY)
	Denmark (DK)	Nether (NL) (DL)	Japan (JP)	UK (DL)	South Africa (ZA)	Estonia (EE)
	Finland (FI)	Poland (PL)	Korea (KO) (DL)	Singapore (2025)	Thailand (TH)	Hungary (HU)
	France (FR)	Portugal (PT)	Malaysia (MY)			Latvia (LV)
	Germany (DE)	Spain (ES)	New Zealand (NZ)			Lithuania (LT)
	Greece (GR)	Sweden (SE)				Malta (MT)
						Romania (RO)
						Slovenia (SI)
						Slovakia (SK)

Note: DL = Draft Legislation

B. Under-Taxed Payments Rule (UTPR)

44	Draft EU Directive & likely 12 in-scope MNEs	Firm indication for	Possibility for	EU likely < 12 MNEs
	2025 (16)	2024 or 2025 (3)	2024 or 2025 (14)	2025–2030 (11)
	AT, BE, CZ, DE, DK, ES, FI, FR, GR, IE, IT, LX, NL, PL, PT, SE	KO (2024) CH (2024 or later) SG (2025)	AE, AU, CA, HK, ID, JP, MY, MU, MX, NZ, ZA, TH, UK (2025 at earliest) QA	BG, HR, CY, EE, HU, LV, LT, MT, RO, SI, SK,

C. Qualifying Domestic Minimum Top-up Tax (QDMTT)

44	Firm Indication	Position not established
	2024 or 2025 (5)	2024+ (39)
	CH, MY, NL, UK SG (2025)	AE, AT, AU, BE, BG, CA, CY, CZ, DE, DK, EE, ES, FI, FR, GR, HK, HR, HU, ID, IE, IT, JP, KO, LT, LV, LX, MT, MU, MX, NZ, PL, PT, QA, RO, SE, SI, SK, TH, ZA

Note 1 On December 15, 2022, the Council of the EU reached unanimous agreement to implement the EU Minimum Tax Directive.

Note 2 The EU Minimum Tax Directive provides the option for Member States to implement a qualified domestic top-up tax (QDMTT) and to defer the application of the IIR and the UTPR up to December 31, 2029, where a maximum number of 12 UPEs are based in that EU Member State. It is expected that this group will have more than 12 in-scope MNEs and thus will implement the IIR and UTPR for 2024 and 2025 respectively. For some jurisdictions the level of in scope MNEs is uncertain and has been estimated.

Note 3 References to 2024 and 2025 include starting dates that do not commence on 1 January, but take place throughout the year.

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