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.
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

End of 2021

October 2021
Agreement at OECD/G20 IF level

End of 2022
EU Pillar 2 Directive adopted
Release of the GloBE Implementation Framework components (e.g. transitional safe harbors and penalty relief)

March 2022
Commentary on GloBE rules

February 2, 2023
IIR targeted to be in effect
Release of Administrative Guidance

July 17, 2023
GloBE Information Return (GIR)
Release of additional Administrative Guidance (including QDMTT and UTPR Safe Harbour)

December 18, 2023
Release of Administrative Guidance

October 3, 2023
Release of STTR MLI

December 31, 2029
Optional EU deferral to apply IIR and UTPR
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
- 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)

DMTT (2025)

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

UTPR (2025)

- Australia
- Canada
- EU*
- Hong Kong (SAR), China
- Korea
- 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)

IIR (2024)

- Austria
- 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

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

- Estonia (deferral / 2030)
- Gibraltar
- Indonesia
- Japan (UTPR)
- Latvia (deferral / 2030)
- Lithuania (deferral)
- Malaysia (UTPR)

Intention to apply DMTT (timing uncertain)

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

* Option to defer implementation to 31 December 2029 in case of max. 12 UPEs
** Domestic IIR from 2026
## Pillar Two — Global overview

### Other related announcements

<table>
<thead>
<tr>
<th>Country</th>
<th>Announcement</th>
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</thead>
<tbody>
<tr>
<td>Bahrain</td>
<td>Considering the introduction of a CIT as part of its commitment to the OECD minimum tax</td>
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<tr>
<td>Barbados</td>
<td>Plans to introduce a 9% CIT rate</td>
</tr>
<tr>
<td>Bermuda</td>
<td>CIT (15%) introduced in response to the OECD Pillar Two initiative</td>
</tr>
<tr>
<td>Colombia</td>
<td>2022 tax reform — 15 percent minimum tax</td>
</tr>
<tr>
<td>Curacao</td>
<td>Policy measures to address impact of Pillar Two under consideration</td>
</tr>
<tr>
<td>Gibraltar</td>
<td>Policy measures to address impact of Pillar Two under consideration</td>
</tr>
<tr>
<td>Isle of Man</td>
<td>Temporary increase of CIT rate to 15% in relation to certain P2 impacted businesses</td>
</tr>
<tr>
<td>Kenya</td>
<td>Plans to review DST and to adopt two-pillar solution</td>
</tr>
<tr>
<td>Kuwait</td>
<td>Plans to introduce business profit tax at a rate of 15%</td>
</tr>
<tr>
<td>Nigeria</td>
<td>Policy measures to address impact of Pillar Two under consideration</td>
</tr>
<tr>
<td>Puerto Rico</td>
<td>Draft legislation aiming to introduce an election to pay 15% minimum tax</td>
</tr>
<tr>
<td>UAE</td>
<td>New corporate tax 9 percent</td>
</tr>
<tr>
<td>US</td>
<td>Corporate alternative minimum tax enacted 15 percent (not Pillar 2 compliant)</td>
</tr>
<tr>
<td>US</td>
<td>Republican Committee introduced two bills with UTPR defensive measure</td>
</tr>
<tr>
<td>Zimbabwe</td>
<td>Domestic Minimum Top-up Tax (design and mechanics not aligned with GloBE rules)</td>
</tr>
</tbody>
</table>
Europe
### Pillar Two — State of Play | European Union (1|3)

<table>
<thead>
<tr>
<th></th>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>EU</td>
<td>Directive adopted</td>
<td>2024*</td>
<td>2025*</td>
<td>optional</td>
<td>EU Tax Centre alert - domestic implementation summary</td>
</tr>
<tr>
<td>Cyprus</td>
<td>Consultation on draft law ended</td>
<td>2024</td>
<td>2025</td>
<td>2025</td>
<td>Local tax alert EU Tax Centre alert</td>
</tr>
</tbody>
</table>

*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)

<table>
<thead>
<tr>
<th>European Union</th>
<th>Status</th>
<th>Income Inclusion Rule (IIR)</th>
<th>Undertaxed Profits Rule (UTPR)</th>
<th>Domestic Top-up Tax (DMTT)</th>
<th>More information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Estonia</td>
<td>Legislation adopted by Parliament</td>
<td>Deferred (2030)</td>
<td>Deferred (2030)</td>
<td>uncertain</td>
<td>EU Tax Centre alert</td>
</tr>
<tr>
<td>Latvia</td>
<td>Draft bill released</td>
<td>Deferred (2030)</td>
<td>Deferred (2030)</td>
<td>uncertain</td>
<td>EU Tax Centre alert</td>
</tr>
<tr>
<td>Lithuania</td>
<td>Draft bill submitted to Parliament</td>
<td>Deferred</td>
<td>Deferred</td>
<td>2025 or later</td>
<td>EU Tax Centre alert</td>
</tr>
</tbody>
</table>

- **E23** — Legislation “enacted” for accounting purposes in 2023
- **SE23** — Legislation “substantively enacted” for accounting purposes in 2023
- **E24** — Legislation “enacted” for accounting purposes in 2024
- **SE24** — Legislation “substantively enacted” for accounting purposes in 2024
## Pillar Two — State of play | European Union (3|3)

<table>
<thead>
<tr>
<th>European Union</th>
<th>Status</th>
<th>Income Inclusion Rule (IIR)</th>
<th>Undertaxed Profits Rule (UTPR)</th>
<th>Domestic Top-up Tax (DMTT)</th>
<th>More information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Malta</td>
<td>Legislation enacted</td>
<td>Deferred (2030)</td>
<td>Deferred (2030)</td>
<td>uncertain</td>
<td>Local tax alert EU Tax Centre alert</td>
</tr>
<tr>
<td>Slovakia</td>
<td>Legislation enacted</td>
<td>Deferred</td>
<td>Deferred</td>
<td>2024 SE23 / E23</td>
<td>Local tax alert</td>
</tr>
<tr>
<td>Spain</td>
<td>Draft bill released</td>
<td>2024</td>
<td>2025</td>
<td>2024</td>
<td>EU Tax Centre alert</td>
</tr>
<tr>
<td>Cyprus</td>
<td>Other</td>
<td>Consent to IF agreement on transitional CbyC Safe Harbor, transitional UTPR Safe Harbour and QDMTT Safe Harbour — see EU Tax Centre alert</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **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
## Rest of Europe — Status

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

* 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
- E24 — Legislation “enacted” for accounting purposes in 2024
- 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

**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 — State of play | Middle East and Africa

<table>
<thead>
<tr>
<th>Middle East &amp; Africa</th>
<th>Status</th>
<th>Income Inclusion Rule (IIR)</th>
<th>Undertaxed Profits Rule (UTPR)</th>
<th>Domestic Top-up Tax (DMTT)</th>
<th>More Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mauritius</td>
<td>Formal Indication</td>
<td>uncertain</td>
<td>uncertain</td>
<td>timing uncertain</td>
<td>Local tax alert</td>
</tr>
<tr>
<td>Qatar</td>
<td>Consultation on draft legislation ongoing</td>
<td>uncertain</td>
<td>uncertain</td>
<td>2024?</td>
<td></td>
</tr>
<tr>
<td>South Africa</td>
<td>Draft GMT and administrative rules released</td>
<td>2024</td>
<td>uncertain</td>
<td>2024</td>
<td>EU Tax Centre alert, Local tax alert</td>
</tr>
<tr>
<td>UAE</td>
<td>Public consultation ongoing</td>
<td>timing uncertain</td>
<td>timing uncertain</td>
<td>timing uncertain</td>
<td>EU Tax Centre alert</td>
</tr>
<tr>
<td>ATAF**</td>
<td>Other</td>
<td>Guidance for domestic minimum top-up tax implementation — see EU Tax Centre alert</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bahrain</td>
<td>Other</td>
<td>Introduction of a CIT as part of its commitment to the OECD minimum tax under consideration — see Local tax alert</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kenya</td>
<td>Other</td>
<td>Plans to review DST and to adopt two-pillar solution — see EU Tax Centre alert</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kuwait</td>
<td>Other</td>
<td>Plans to introduce business profit tax at a rate of 15% — see local tax alert</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nigeria</td>
<td>Other</td>
<td>Policy measures to address impact of Pillar Two under consideration — see EU Tax Centre alert</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Zimbabwe</td>
<td>Other</td>
<td>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)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* 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)
- 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

Map showing the state of play for various countries in the Asia Pacific region, indicating the status of legislation passed/approved or dates when draft legislation was released or intentions to apply specific measures.
## Pillar Two — State of play | Asia Pacific

<table>
<thead>
<tr>
<th>Asia Pacific</th>
<th>Status</th>
<th>Income Inclusion Rule (IIR)</th>
<th>Undertaxed Profits Rule (UTPR)</th>
<th>Domestic Top-up Tax (DMTT)</th>
<th>More information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Australia</td>
<td>Consultation on draft legislation ongoing</td>
<td>2024</td>
<td>2025</td>
<td>2024</td>
<td>Local tax alert</td>
</tr>
<tr>
<td>Hong Kong (SAR)</td>
<td>Consultation ongoing</td>
<td>2025</td>
<td>2025</td>
<td>2025</td>
<td>Local tax alert</td>
</tr>
<tr>
<td>Indonesia</td>
<td>Formal indication</td>
<td>timing uncertain</td>
<td>uncertain</td>
<td>timing uncertain</td>
<td></td>
</tr>
<tr>
<td>Japan</td>
<td>IIR legislation + amendments enacted</td>
<td>April 2024 SE23 / E23</td>
<td>April 2025 (estimated)</td>
<td>timing uncertain</td>
<td>Local tax alerts (June 2023; Oct 2023; Dec 2023)</td>
</tr>
<tr>
<td>Korea</td>
<td>Legislation enacted</td>
<td>2024 SE23 / E23</td>
<td>2025 SE23 / E23</td>
<td>uncertain</td>
<td>Local tax alert (Jan 2024; April 2024)</td>
</tr>
<tr>
<td>Malaysia</td>
<td>Legislation enacted</td>
<td>2025 SE23 / E23</td>
<td>uncertain</td>
<td>2025 SE23 / E23</td>
<td>Local tax alert</td>
</tr>
<tr>
<td>Singapore</td>
<td>Official Plan</td>
<td>2025</td>
<td>timing uncertain</td>
<td>2025</td>
<td>Local tax alert</td>
</tr>
<tr>
<td>Thailand</td>
<td>Consultation on draft legislation ongoing</td>
<td>2025</td>
<td>2025</td>
<td>2025</td>
<td>Local tax alert</td>
</tr>
</tbody>
</table>

* 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
- **E24** — Legislation “enacted” for accounting purposes in 2024
- **SE23** — Legislation “substantively enacted” for accounting purposes in 2023
- **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)
- 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

Canada
Mexico
US
Jamaica
Bermuda
Bahamas
Puerto Rico
Barbados
Colombia
## Pillar Two — State of play | Americas

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

* UTPR legislation pending

- **Official plan** — Program for implementation with dates
- **Formal indication** — Written document issued by the government stating an intent to implement
Some or all of the services described herein may not be permissible for KPMG audit clients and their affiliates or related entities.