BEPS 2.0: state of play

KPMG Global Tax & Legal | 10 May 2023

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.
BEPS 2.0 | Pillar Two - timeline

2021

- October 2021: Agreement at OECD/G20 IF level

2022

- March 2022: Commentary on GloBE rules
- Feb 2, 2023: Release of Administrative Guidance

2023

- July 2023: Release of GIR and (potentially) QDMTT safe harbor guidance expected

2024

- 2024: IIR targeted to be in effect

2025

- 2025: UTPR targeted to be in effect

2026–2030

- Dec 31, 2029: Optional EU deferral to apply IIR and UTPR

- Somewhere in 2023: Release of further OECD guidance expected
## Pillar Two – Global overview

### Legislation passed / approved
- **IIR (2024)**
  - Australia
  - Canada
  - EU – potential deferrals where few UPEs
  - Japan
  - Korea
  - Liechtenstein
  - Switzerland
  - United Kingdom
- **UTPR (2024)**
  - Korea (?)
  - Switzerland (?)
- **IIR (2025)**
  - Hong Kong (SAR), China
  - Singapore
  - Thailand
- **DMTT (2024)**
  - Australia
  - Canada
  - Germany
  - Ireland
  - Liechtenstein
  - Netherlands
  - Sweden
  - Switzerland
  - United Kingdom
- **UTPR (2025)**
  - Australia
  - Canada
  - EU – potential deferrals where few UPEs
  - Hong Kong (SAR), China
  - Liechtenstein
  - Singapore
  - Thailand
  - United Kingdom

### Draft legislation released
- **IIR (2024)**
  - Germany (March 2023)
  - Ireland (March 2023)
  - Liechtenstein (March 2023)
  - Netherlands (October 2022)
  - Sweden (March 2023)
  - Switzerland (August 2022)
  - United Kingdom (March 2023)

### Intention to apply IIR and UTPR (timing uncertain)
- Indonesia
- Japan (UTPR)
- Malaysia
- Mexico
- Norway
- New Zealand
- Qatar
- South Africa
- UAE
- EU (optional)
- Indonesia
- Japan
- Malaysia
- Mauritius
- New Zealand
- Qatar

### Other related announcements
- Bermuda – policy measures to address impact of Pillar Two under consideration
- Colombia 2022 tax reform – 15% minimum tax
- Kenya – plans to review DST and to adopt two-pillar solution
- Nigeria – policy measures to address impact of Pillar Two under consideration
- UAE new corporate tax 9%
- US corporate alternative minimum tax enacted 15% (not Pillar 2 compliant)
Europe
Pillar Two — state of play | Europe

- **Sweden**
  - Legislation passed/approved (2024)
  - Draft legislation released (2025)
  - Intention to apply IIR/UTPR (uncertain)

- **Ireland**
  - Legislation passed/approved (2025)

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

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

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

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

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

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

- **IIR (2024)**
- **IIR (2025)**
- **UTPR (2024)**
- **UTPR (2025)**

- **Legend**
  - Legislation passed/approved
  - Draft legislation released
  - IIR (2024)
  - IIR (2025)
  - UTPR (2024)
  - UTPR (2025)
  - Intention to apply IIR/UTPR (uncertain)
  - DMTT (2024)
  - DMTT (2025)
  - Intention/option to apply DMTT (uncertain)
## Pillar Two — state of play | European Union

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* Option to defer implementation to 31 December 2029 in case of max. 12 UPEs (EU countries with likely no more than 12 UPEs include Bulgaria, Croatia, Cyprus, Estonia, Hungary, Latvia, Lithuania, Malta, Romania, Slovenia and Slovakia)

- **Official plan** – Program for implementation with dates
- **Formal indication** – Written document issued by the government stating an intent to implement
- **Informal indication** – MOF officials in the country have said at seminars that they plan to implement
## Pillar Two — state of play | Europe (outside EU)

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* UK UTPR legislation pending

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Asia Pacific
Pillar Two — state of play | Asia Pacific

Legend

- Legislation passed/approved
- Draft legislation released
- IIR (2024)
- IIR (2025)
- DMTT (2024)
- DMTT (2025)
- Intention to apply IIR/UTPR (timing uncertain)
- Other related legislation/announcement
- Intention/option to apply DMTT (timing uncertain)
- UTPR (2024)
- UTPR (2025)
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Middle East and Africa
Pillar Two — state of play | Middle East and Africa

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

- Mauritius
- UAE
- Qatar
- Nigeria
- Kenya
- South Africa
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<thead>
<tr>
<th>Middle East &amp; Africa</th>
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Americas
## Pillar Two — state of play | Americas

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Canada: Official Plan 2024 2025 2024

Mexico: Formal indication timing uncertain timing uncertain uncertain

Bermuda: Other Policy measures to address impact of Pillar Two under consideration

Colombia: Other Corporate minimum tax of 15% adopted. Unclear whether may qualify as QDMTT

United States: Other Corporate alternative minimum tax of 15 percent adopted (general understanding that CAM-T is not IIR equivalent)
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