

# **IBFD Webinar**

## **The OECD Pillar 2: Focus on the GloBE rules**

1 February 2022 – 15.00 (Amsterdam local time)

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## Summary

In October 2021, the vast majority of the Inclusive Framework (IF) member countries agreed upon a two-pillar solution to address the tax challenges deriving from the digitalization of the economy as proposed by the OECD. This project, which should become reality as from 2022, represents a complete rewriting of the current international tax rules, allowing states to tax profits of non-resident businesses without physical presence in their territory, on the one hand, and providing them with a comprehensive solution to tackle base erosion and profit shifting, on the other hand.

This webinar discusses the latest developments concerning Pillar Two, the second component of the global tax reform aimed at providing a comprehensive solution to base erosion and profit shifting by imposing a minimum level of taxation on global profits of multinational enterprises. After an overview of the project's policy goals, the webinar will examine in depth the rules of the Global Anti-Base Erosion (GloBE) proposal in expectation of the Model Rules, which should have already been issued by the end of November 2021, their coordination and the challenges relating to their implementation.

## Learning objectives

This webinar discusses the latest developments concerning Pillar Two.

After following this webinar, participants will be able to:

- Identify the main design features of the GloBE rules and their critical aspects
- List the latest developments agreed upon by the (IF)
- Examine the concrete implementation of the Pillar 2 project
- Assess future challenges for multinational enterprises affected by the new rules

## Field of study

Taxes

## Who should participate?

The webinar is suitable for all tax professionals, including accountants, controllers, in-house tax managers and directors, lawyers, advisers, policymakers and government officials who wish to follow the latest developments in the OECD-led global tax reform.

## Course level and prerequisites

This is an upper intermediate-level webinar. Participants in this webinar are expected to be familiar with the key concepts of international tax law.

## Advance preparation

Participation in this webinar does not require any preparation.



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## **Interactive webinar – “Group Internet Based” (live webinar only)**

During live webinars, it is possible to interact with the presenters via a chat message function. Please note that questions are answered based on relevance, order of receipt and available time. Additionally, participants in the live webinar are invited to answer poll questions or to complete short tests. Participants will also have access to the on-demand version for a further 12 months from the live date.

*Date of live broadcast: 1 February 2022*

## **On-demand webinar**

On-demand webinars are intended for individual self-study only. Unlike live webinars, they are not open to interactive participation nor do they offer the assistance of a real-time instructor. Access to on-demand webinars is granted for a period of 12 months.

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## **Webinar registration details**

If you have any questions about following the webinar, technical requirements, or payments and cancellations, please consult our [FAQ](#).

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## Agenda

- ▶ The OECD Pillar 2 project
  - ▶ BEPS 2.0 – Introduction
  - ▶ Pillar 2 – Policy objectives
  
- ▶ The GloBE rules
  - ▶ Common considerations
    - ▶ Scope
    - ▶ Tax base
    - ▶ Effective tax rate test
    - ▶ Global minimum tax rate
    - ▶ Carve-outs
  - ▶ Income inclusion rule
    - ▶ Switch-over rule
  - ▶ Undertaxed payment rule
  - ▶ Rule coordination
  
- ▶ Subject-to-tax rule
  - ▶ Scope
  - ▶ Minimum rate
  
- ▶ Implementation
  - ▶ Implementation challenges
  - ▶ Timeline