



IBFD
Webinar

CURRENT DEVELOPMENTS IN INTERNATIONAL TAXATION

The State of the Art of Pillar One and Pillar Two

Date: 2 August 2022 | **Time:** 15:00-16:00 CET | **Level:** Intermediate

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 (so-called BEPS 2.0 Project). This project represents a complete rewriting of the current international tax rules, allowing states to tax a share of residual profits of non-resident businesses without physical presence in their territory, on the one hand, and to impose a minimum level of tax on global profits of MNEs regardless of where they are headquartered on the other hand.

Despite the IF agreement on the general architecture of the two pillars, negotiations are still ongoing in the international tax setting. After an overview of the projects' policy goals and overall design, this webinar discusses the latest developments concerning both Pillar One and Pillar Two, the work that has been carried out so far, and what is still missing to finalize the projects.

Learning objectives

This webinar discusses the latest developments concerning Pillar One and Pillar Two. After following this webinar, participants will be able to:

- Identify the main design features of the two pillars
- List the latest developments agreed upon by the Inclusive Framework
- Contextualize where we stand at the present stage vis-à-vis the implementation timeline envisioned by the OECD

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 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.

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. Participants will also have access to the on-demand version for a further 12 months from the live date.

Date of live broadcast: **2 August 2022, 15:00 (Amsterdam local time)**

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.

Continuing Professional Education

Many accrediting organizations will grant continuing professional education (CPE) credit(s) for an IBFD audio-visual broadcast. It is advisable, however, that you check with your accrediting body as to whether this applies only to live webinars or to on-demand webinars as well.

IBFD is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of CPE on the National Registry of CPE Sponsors. State boards of accountancy have the final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be submitted to the National Registry of CPE Sponsors through its website: www.nasbregistry.org. NASBA CPE credit – 1 (only applicable to live webinar).

Webinar registration details

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

Agenda

Block 1: The BEPS 2.0 Project

- Policy objectives
- Overview

Block 2: The Pillar One Project

- Overall design
 - Amount A
 - Amount B
 - Tax certainty
- Timeline
- The state of the art (Amount A)
 - Nexus and revenue sourcing
 - Tax base determination
 - Scope
 - Exclusion of extractive industries and regulated financial services
 - Tax certainty

Block 3: The Pillar Two Project

- Common consideration
 - Scope
 - Tax base
 - ETR
 - Carve-outs
- Overall design
 - IIR (and QDMTT)
 - UTPR
 - SOR
 - STTR
- State of the art
 - Model rules and commentaries
 - Agreed administrative guidance
 - STTR details and MLI
- Implementation timeline

Instructors

Shee Boon Law
Hans Pijl

| *Consultant, IBFD Tax Services*
| *Principal Associate, IBFD Tax Services*

Facilitator

Diana Calderon Manrique

| *Managing Senior, IBFD Latin America team*