

# **Managing Pillar Two Implementation: Impact Assessment, Compliance and Beyond**

**Bangkok / 27 – 29 October 2025**

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## Overview and Learning Objectives

OECD/ G20 Inclusive Framework on BEPS Pillar Two proposals concerning the Global Minimum Tax (GMT) imposing 15% minimum taxes on the profits of multinational groups with global revenue of at least EUR 750 million are being implemented by countries. These rules came into effect in many countries, including some in the Asia-Pacific region, from 2024. This state of flux will likely raise many practical questions for multinational groups facing potential top-up taxes, as well as for countries introducing top-up taxes.

This three-day Masterclass explores the practical impact of Pillar Two GMT top-up taxes that may be imposed under the QDMTT, IIR and UTPR. The course will explore how the rules are expected to apply as well as some of the more surprising outcomes that may arise from their application.

The course will demystify the complex Pillar Two GMT rules using examples, case studies and group discussions based on real-life scenarios covering the following topics:

- Impact assessment of GMT
  - Scope of application of IIR, UTPR and QDMTT, as well as the order of application
  - Examples in the application of GloBE Rules
  - Application to special entities under the GloBE Rules
  - Implementation of QDMTT: mandatory and optional variations
- Examples of country implementation of Pillar Two and (un)expected compliance obligations
- GMT compliance obligations
  - Dealing with compliance obligations of an in-scope MNE Group
  - Application of Transitional Safe Harbours and Permanent Safe Harbours
  - GloBE information returns and compliance obligations
  - Application of GMT to international tax planning structures, e.g. holding, financing, IP and supply chain structures
- Post-GMT international tax landscape
  - Tax competition, QRTCs and design of tax incentives
  - QDMTT and changes to tax competition and incentive regimes
  - Pillar Two considerations in M&A transactions
  - Potential areas of disputes and dispute resolution mechanisms

## Field of Study

Taxes

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## Who Should Attend?

The course is suitable for government staff, tax advisers, lawyers, accountants, in-house tax directors, controllers and finance staff.

## Course Level and Prerequisites

This is an intermediate-level course. Participants taking this course will be expected to have a good understanding of the basic concepts of the GloBE rules. Those who do not meet this requirement are recommended to follow IBFD's online course Fundamentals of GloBE Rules – Pillar Two before attending this course.

After this masterclass, the participants will be able to

- Apply the complex GloBE rules to specific examples, cases and real-life examples
- Assess the impact of various elements in the application of GloBE minimum taxes e.g. IIR, UTPR and QDMTT, the order of their application and their application to common international tax planning structures – e.g. holding, financing, IP and supply chain structures
- Develop strategies to comply with GMT obligations around the globe
- Identify the impact of QDMTT and navigate changes and strategies for dealing with tax competition and incentive regimes in the post-GMT era
- Evaluate the impact of Pillar Two on M&A transactions and changes that need to be made in M&A due diligence
- Identify potential areas of disputes and dispute management options

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## Day 1

08.30 - 09.00 **Registration**

09.00 - 09.20 **Welcome and IBFD Overview**

09.20 - 11.00 **Impact Assessment of Pillar Two Top-Up Taxes**

- Recent developments in the implementation of Global Minimum Tax (GMT) rules
- Scope of application of IIR, UTPR and QDMTT
- Order of application – LTCE, UPE, IPE, POPEs
  - Application of GMT to different types of group structures
  - Application of UTPR
- Dealing with special entities:
  - Joint ventures, minority-owned constituent entities, multi-parented MNE groups
  - Treatment of flow-through entities, hybrid entities, PEs
- Impact of different types of taxes paid – withholding taxes, CFC taxes, GILTI, etc.
- Practical examples and case studies
- Q&A

11.00 - 11.20 **Break – Refreshments**

11.20 - 12.45 **Impact Assessment of Pillar Two Top-Up Taxes** (*continued*)

12.45 - 14.00 **Lunch**

14.00 - 15.30 **Implementation of QDMTT**

- Policy choices regarding implementation of QDMTT
  - QDMTT vs. DMTT
  - QDMTT as a safe harbour
  - Mandatory variations
  - Optional variations
- Key features of a QDMTT with examples
  - In-scope multinational groups
  - Determination of top-up taxes
  - Minimum requirements
- Practical examples and case studies
- Q&A

15.30 - 15.50 **Break – Refreshments**

15.50 - 17.00 **Implementation of QDMTT** (*continued*)

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## Day 2

### 9.00 - 10.40 **Implementation of GMT in South East Asia**

- Global Minimum Tax implementation and administration in the region
- Key features under the GMT legislation of selected countries
  - Scope of application: (Q)DMTT, IIR, UTPR
  - Application of safe harbours, transitional provisions and carve-outs
  - Compliance aspects and administration aspects
  - Registration and notification requirements
  - Filing requirements and due dates
  - Payment of taxes
  - Administration and audit practices
  - Penalties
- Practical examples and case studies

### 10.40 - 11.00 Break – Refreshments

### 11.00 - 12.45 **GMT Compliance**

- An overview of Pillar Two compliance obligations
- Compliance requirements (including GIR)
- Application of safe harbours and simplified ETR
- General reporting & compliance process
- Data & system considerations
- Practical examples and case studies
- Q&A

### 12.45 - 14.00 Lunch

### 14.00 - 15.30 **Application of GMT to International Tax Planning Structures**

- Application of GMT to holding structures
- Financing structures under GMT
- IP structures under GMT
- Supply chain structures under GMT
- Substance and top-up taxes
- Practical examples and case studies
- Q&A

### 15.30 - 15.50 Break – Refreshments

### 15.50 - 17.00 **Application of GMT to International Tax Planning Structures** *(continued)*

## Day 3

### 09.00 - 10.30 **Post-GMT International Tax Landscape**

- Post-GMT tax competition
  - Impact of the Substance Base Income Exclusion (SBIE) and Qualifying Refundable Tax Credits (QRTCs) on post-Pillar Two effective tax rates
- “Pillar Two Proof” tax incentives
  - Impact of GloBE Rules on different types of tax incentives
  - Design of tax incentives in the post-Pillar Two era
  - The ‘non-benefit’ requirement
  - QRTCs and MTTC
- Practical examples and case studies
- Q&A

### 10.30 - 10.50 Break – Refreshments

### 10.50 - 12.45 **GMT Considerations in M&A Transactions**

- Post-GMT mergers and acquisitions
  - Impact of jurisdictional blending
- GMT transitional rules and intra-group transfers of assets
  - Onshoring of intangibles
- Practical examples and case studies
- Q&A

### 12.45 - 14.00 Lunch

### 14.00 - 15.20 **Post-GMT Disputes and Dispute Resolution Mechanisms**

- Areas of potential disputes under GMT
- Tensions between UTPR and EU principles, bilateral tax treaties and principles of public international law
- QDMTT and bilateral investment treaties and stabilization clauses
- Dispute prevention mechanism
  - Reliance on the Model Rules, Commentary and Administrative Guidance
  - Common risk assessment and coordinated compliance
  - Binding certainty mechanisms
- Practical examples and case studies
- Q&A

### 15.20 - 15.40 Break – Refreshments

### 15.40 - 17.00 **Post-GMT Disputes and Dispute Resolution Mechanisms (continued)**