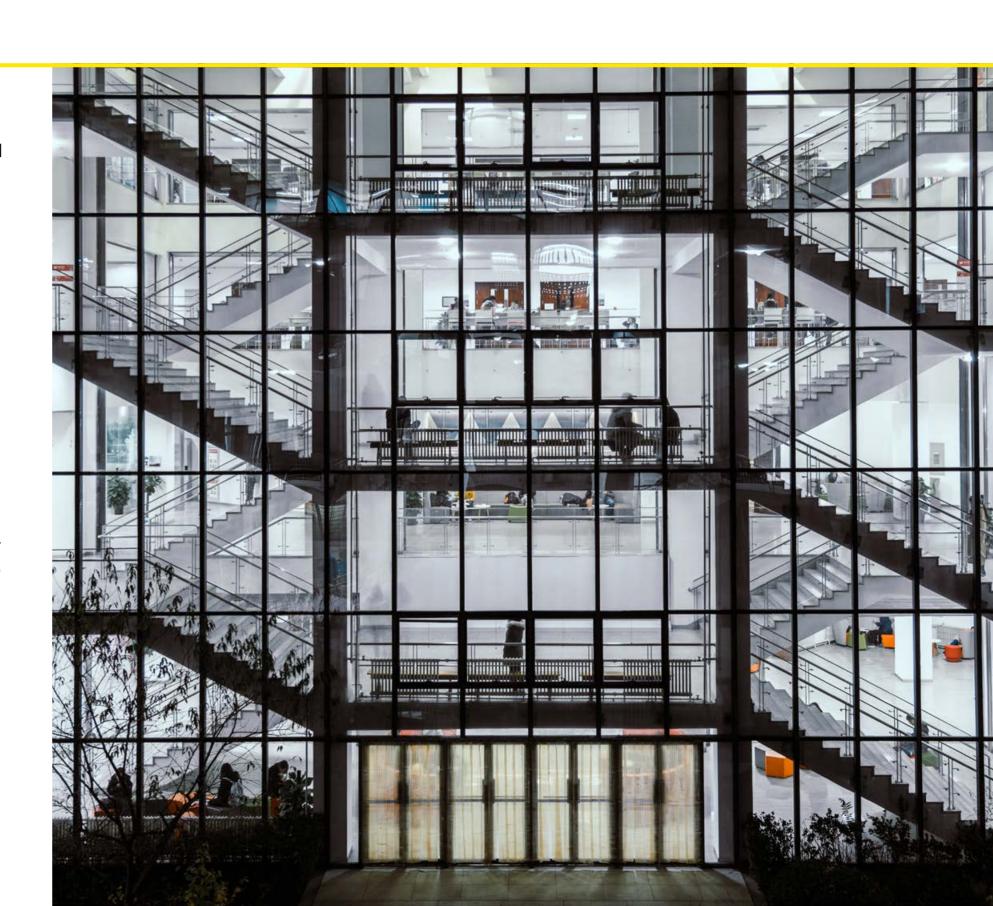


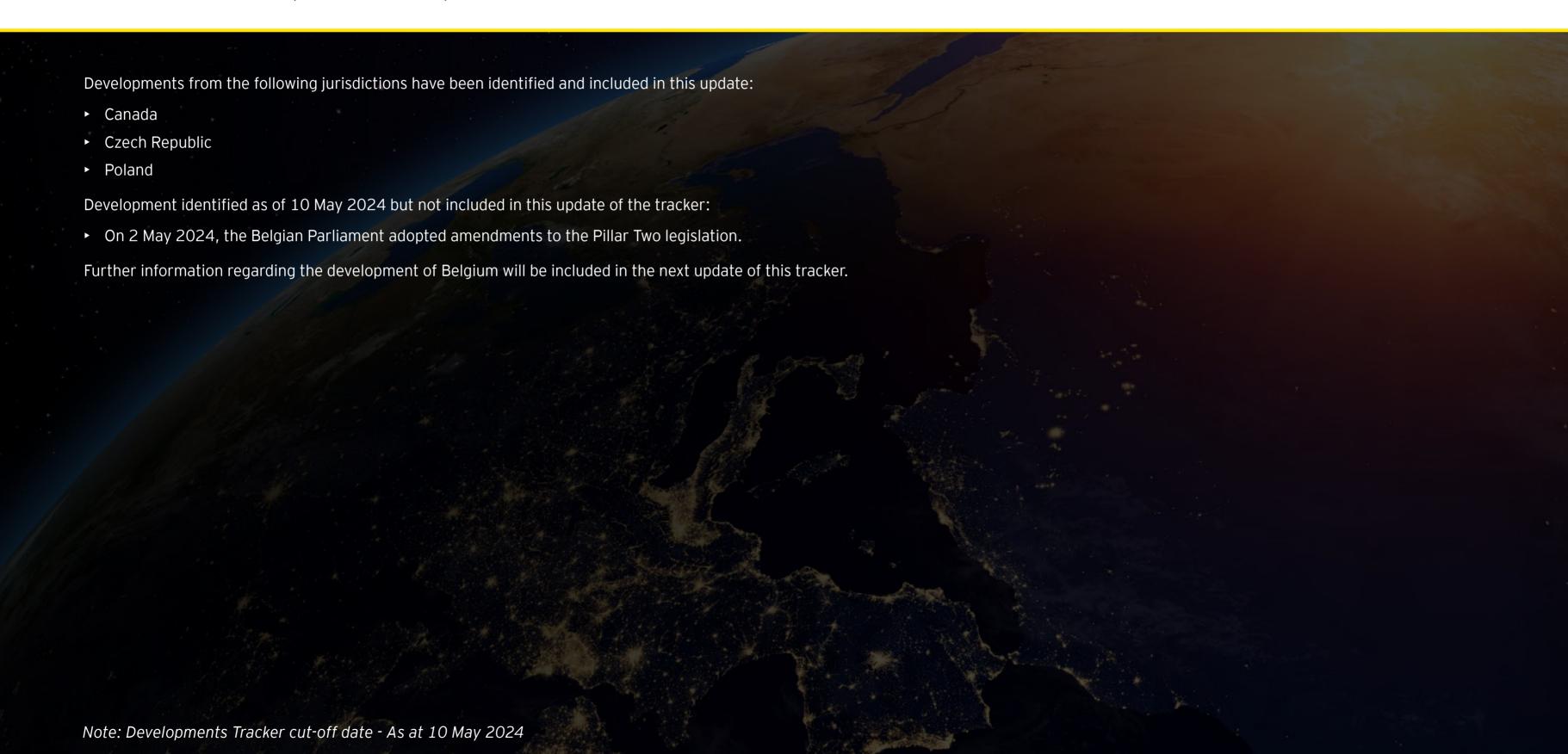
### Important notes

- ▶ This document is intended to provide a summary listing of administrative and legislative developments around the world relating to the implementation of the global minimum tax rules being developed under Pillar Two of the OECD/G20 BEPS 2.0 project. It provides an overview of developments in various jurisdictions, including the dates on which the relevant authorities, institutions, or legislative bodies have made public announcements or released official documents related to Pillar Two.
- ▶ It is important to note that the information provided in this document is subject to change. Although it is updated on a periodic basis to include the latest developments, 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 Pillar Two of the OECD/G20 BEPS 2.0 project.
- ► This material has been prepared for general informational purposes only and is not intended to be relied upon as accounting, tax, legal or other professional advice. It should not be relied upon for penalty protection or for any other purpose except for obtaining general familiarity with the subject matter thereof.
- ► The status summary herein is intended to be generic and should not be relied upon for the purposes of assessing any specific fact patterns. The administrative and legislative developments summarized in this document include items that have not been enacted and may undergo significant changes before they become law.
- Find the most current version of this tracker on <a href="ey.com">ey.com</a>.
- ► To check for new developments or if you have questions regarding the specific items contained herein, please contact your EY engagement team or the EY professionals included in this document.





### New development updates in this edition of the tracker



## Overview of Pillar Two implementation across the world

| Final leg      | jislation          |
|----------------|--------------------|
| Jurisdiction   | Rules covered      |
| European Union | QDMTT, IIR, UTPR   |
| Austria        | QDMTT, IIR, UTPR   |
| Belgium        | QDMTT, IIR, UTPR   |
| Bulgaria       | QDMTT, IIR, UTPR   |
| Croatia        | QDMTT, IIR, UTPR   |
| Czech Republic | QDMTT, IIR, UTPR   |
| Denmark        | QDMTT, IIR, UTPR   |
| Estonia        | Filing obligations |
| Finland        | QDMTT, IIR, UTPR   |
| France         | QDMTT, IIR, UTPR   |
| Germany        | QDMTT, IIR, UTPR   |
| Greece         | QDMTT, IIR, UTPR   |
| Hungary        | QDMTT, IIR, UTPR   |
| Ireland        | QDMTT, IIR, UTPR   |
| Italy          | QDMTT, IIR, UTPR   |
| Japan          | IIR                |
| Liechtenstein  | QDMTT, IIR, UTPR   |
| Luxembourg     | QDMTT, IIR, UTPR   |
|                |                    |

| Final leg                | gislation          |
|--------------------------|--------------------|
| Jurisdiction             | Rules covered      |
| Malaysia                 | QDMTT, IIR         |
| Malta                    | Filing Obligations |
| Mauritius*               | QDMTT              |
| Netherlands              | QDMTT, IIR, UTPR   |
| New Zealand              | IIR, UTPR          |
| Norway                   | QDMTT, IIR         |
| Qatar*                   | Unclear            |
| Romania                  | QDMTT, IIR, UTPR   |
| Slovakia                 | QDMTT              |
| Slovenia                 | QDMTT, IIR, UTPR   |
| South Korea              | IIR, UTPR          |
| Sweden                   | QDMTT, IIR, UTPR   |
| Switzerland              | QDMTT              |
| United Arab<br>Emirates* | Unclear            |
| United Kingdom           | QDMTT, IIR         |
| Vietnam                  | QDMTT, IIR         |

|   | Draft legislation |                    |  |  |  |  |  |  |  |  |
|---|-------------------|--------------------|--|--|--|--|--|--|--|--|
|   | Jurisdiction      | Rules covered      |  |  |  |  |  |  |  |  |
|   | Australia         | QDMTT, IIR, UTPR   |  |  |  |  |  |  |  |  |
|   | Barbados          | QDMTT              |  |  |  |  |  |  |  |  |
|   | Canada            | QDMTT, IIR         |  |  |  |  |  |  |  |  |
|   | Cyprus            | QDMTT, IIR, UTPR   |  |  |  |  |  |  |  |  |
|   | Latvia            | Filing obligations |  |  |  |  |  |  |  |  |
|   | Lithuania         | Filing obligations |  |  |  |  |  |  |  |  |
| ř | Poland            | QDMTT, IIR, UTPR   |  |  |  |  |  |  |  |  |
|   | South Africa      | IIR, QDMTT         |  |  |  |  |  |  |  |  |
| Š | Spain             | QDMTT, IIR, UTPR   |  |  |  |  |  |  |  |  |
|   | Switzerland       | IIR, UTPR          |  |  |  |  |  |  |  |  |
|   | United Kingdom    | UTPR               |  |  |  |  |  |  |  |  |

| Intention to implement Pillar Two |
|-----------------------------------|
| Bahamas                           |
| Gibraltar                         |
| Guernsey                          |
| Hong Kong                         |
| Indonesia                         |
| Isle of Man                       |
| Jersey                            |
| Singapore                         |
| Taiwan                            |
| Thailand                          |

Acronyms: IIR (Income Inclusion Rule), UTPR (Undertaxed Profits Rule), QDMTT (Qualified Domestic Minimum Top-up Tax).

<sup>\*</sup>Mauritius, Qatar and the United Arab Emirates have enacted a law incorporating an initial provision for the introduction of Pillar Two. Detailed provisions and regulations regarding how these countries will implement Pillar Two are expected to be developed in the future.

<sup>\*\*</sup>The United States is not included in the implementation overview above since this jurisdiction does not yet have final or draft legislation and has not yet indicated an intention to implement Pillar Two into domestic law. Additionally, the OECD is not included as it does not possess legislative authority

# Summary overview: Current status of Pillar Two implementation across certain jurisdictions (1/7)

| Jurisdiction or institution | Date of latest development | QDMTT             | IIR               | UTPR Expected date of entry into effect |   | EY Global Tax Alert          |
|-----------------------------|----------------------------|-------------------|-------------------|---|---|------------------------------|
| Australia                   | 21 March 2024              | Draft legislation | Draft legislation | Draft legislation                       | IIR and QDMTT - 1 January 2024<br>UTPR - 1 January 2025     | For more details, click here |
| Austria                     | 14 December 2023           | Final legislation | Final legislation | Final legislation                       | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024 | For more details, click here |
| Bahamas                     | 21 February 2024           | Intended          | Unclear           | Unclear                                 | QDMTT - Unclear   | For more details, click here |
| Barbados                    | 15 December 2023           | Draft legislation | Unclear           | Unclear                                 | QDMTT - 1 January 2024                                      | For more details, click here |
| Belgium                     | 06 March 2024              | Final legislation | Final legislation | Final legislation                       | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024 |                              |
| Bermuda                     | 8 August 2023              | No                | No                | No                                      | Unclear   |                              |
| Bulgaria                    | 12 December 2023           | Final legislation | Final legislation | Final legislation                       | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024 | For more details, click here |
| Canada                      | 30 April 2024              | Draft legislation | Draft legislation | Intended                                | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024 |                              |

#### Legend:

- 'Intended' means there is a clear expectation based on publicly available information that this measure will be enacted by the jurisdiction.
- 'Intended (Delay)' means that the jurisdiction has deferred the introduction of Pillar Two as allowed by the EU Minimum Taxation Directive whereby Member States that have a small number of headquartered groups within the scope of the rules can opt to delay their application of the rules for up to six consecutive fiscal years.
- 'No' means there is a clear expectation based on publicly available information that this measure will not be enacted by the jurisdiction within the next 3 years.
- 'Unclear' means that either the jurisdiction has not publicly commented on the measure yet, or the jurisdiction has indicated that it will consider the measure in more detail at a later date.
- "Final legislation' means a legislation approved by the relevant legislative bodies." This term includes both, legislation already enacted or legislation that awaits a procedural formality to achieve official enactment.
- 'Draft legislation' means a preliminary version of a proposed law that is still under consideration and development.

# Summary overview: Current status of Pillar Two implementation across certain jurisdictions (2/7)

| Jurisdiction or institution | Date of latest development | QDMTT             | IIR               | UTPR Expected date of entry into effect                           |  | EY Global Tax Alert                 |
|-----------------------------|----------------------------|-------------------|-------------------|---|--|-------------------------------------|
| Croatia                     | 22 December 2023           | Final legislation | Final legislation | Final legislation   | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024  | For more details, click here        |
| Cyprus                      | 3 October 2023             | Draft Legislation | Draft Legislation | Draft Legislation UTPR - 31 December 2024  QDMTT - 1 January 2025 |  | For more details, click here        |
| Czech Republic              | 26 April 2024              | Final legislation | Final legislation | Final legislation   | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024  |                                     |
| Denmark                     | 19 March 2024              | Final legislation | Final legislation | Final legislation   | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024* | For more details, click <u>here</u> |
| Estonia                     | 10 April 2024              | No                | Intended (Delay)  | Intended (Delay)  | IIR and UTPR - 31 December 2029                              |                                     |
| European Union <sup>1</sup> | 15 December 2022           | Final legislation | Final legislation | Final legislation   | IIR - 31 December 2023<br>UTPR - 31 December 2024            | For more details, click here        |
| Finland                     | 28 December 2023           | Final legislation | Final legislation | Final legislation   | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024  | For more details, click here        |

<sup>&</sup>lt;sup>1</sup> The European Union does not enact local legislation. However, it plays a role in guiding and coordinating the implementation of Pillar Two measures among its Member States through directives and regulations. For the purposes of the European Union line item above, "No" indicates that the EU has not yet released any documents related to the applicable rule.

#### Legend:

- 'Intended' means there is a clear expectation based on publicly available information that this measure will be enacted by the jurisdiction.
- 'Intended (Delay)' means that the jurisdiction has deferred the introduction of Pillar Two as allowed by the EU Minimum Taxation Directive whereby Member States that have a small number of headquartered groups within the scope of the rules can opt to delay their application of the rules for up to six consecutive fiscal years.
- 'No' means there is a clear expectation based on publicly available information that this measure will not be enacted by the jurisdiction within the next 3 years.
- 'Unclear' means that either the jurisdiction has not publicly commented on the measure yet, or the jurisdiction has indicated that it will consider the measure in more detail at a later date.
- "Final legislation' means a legislation approved by the relevant legislative bodies." This term includes both, legislation already enacted or legislation that awaits a procedural formality to achieve official enactment.
- 'Draft legislation' means a preliminary version of a proposed law that is still under consideration and development.

<sup>\*</sup> Refer to the latest entry of Denmark in section 'Jurisdiction reactions on Pillar Two'.

# Summary overview: Current status of Pillar Two implementation across certain jurisdictions (3/7)

| Jurisdiction or institution | Date of latest development | QDMTT             | IIR               | UTPR Expected date of entry into effect                                      |   | EY Global Tax Alert                 |
|-----------------------------|----------------------------|-------------------|-------------------|--|---|-------------------------------------|
| France                      | 21 December 2023           | Final legislation | Final legislation | Final legislation  IIR and QDMTT - 31 December 2023  UTPR - 31 December 2024 |   | For more details, click here        |
| Germany                     | 15 December 2023           | Final legislation | Final legislation | Final legislation  | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024 | For more details, click here        |
| Gibraltar                   | 19 December 2023           | Intended          | Intended          | Intended QDMTT - 31 December 2023  |   | For more details, click here        |
| Greece                      | 5 April 2024               | Final legislation | Final legislation | Final legislation  | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024 | For more details, click <u>here</u> |
| Guernsey                    | 19 May 2023                | Intended          | Intended          | Unclear  | IIR and QDMTT - 1 January 2025                              | For more details, click here        |
| Hong Kong                   | 21 December 2023           | Intended          | Intended          | Intended   | 1 January 2025  | For more details, click here        |
| Hungary                     | 21 November 2023           | Final legislation | Final legislation | Final legislation  | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024 | For more details, click here        |
| Indonesia                   | 20 December 2022           | Intended          | Intended          | Intended   | Unclear   |                                     |

#### Legend:

- 'Intended' means there is a clear expectation based on publicly available information that this measure will be enacted by the jurisdiction.
- 'Intended (Delay)' means that the jurisdiction has deferred the introduction of Pillar Two as allowed by the EU Minimum Taxation Directive whereby Member States that have a small number of headquartered groups within the scope of the rules can opt to delay their application of the rules for up to six consecutive fiscal years.
- 'No' means there is a clear expectation based on publicly available information that this measure will not be enacted by the jurisdiction within the next 3 years.
- 'Unclear' means that either the jurisdiction has not publicly commented on the measure yet, or the jurisdiction has indicated that it will consider the measure in more detail at a later date.
- "Final legislation' means a legislation approved by the relevant legislative bodies." This term includes both, legislation already enacted or legislation that awaits a procedural formality to achieve official enactment.
- 'Draft legislation' means a preliminary version of a proposed law that is still under consideration and development.

# Summary overview: Current status of Pillar Two implementation across certain jurisdictions (4/7)

| Jurisdiction or institution | Date of latest development | QDMTT             | IIR               | UTPR              | Expected date of entry into effect                          | EY Global Tax Alert          |  |
|-----------------------------|----------------------------|-------------------|-------------------|-------------------|---|------------------------------|--|
| Ireland                     | 12 December 2023           | Final legislation | Final legislation | Final legislation | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024 | For more details, click here |  |
| Isle of Man                 | 19 May 2023                | Intended          | Intended          | Unclear           | IIR and QDMTT - 1 January 2025                              | For more details, click here |  |
| Italy                       | 19 December 2023           | Final legislation | Final legislation | Final legislation | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024 | For more details, click here |  |
| Japan                       | 26 April 2024              | Intended          | Final legislation | Intended          | IIR - 1 April 2024<br>QDMTT and UTPR - Unclear              |                              |  |
| Jersey                      | 19 May 2023                | Intended          | Intended          | Unclear           | IIR and DMTT - 1 January 2025                               | For more details, click here |  |
| Latvia                      | 30 January 2024            | Unclear           | Intended (Delay)  | Intended (Delay)  | IIR and UTPR - 31 December 2029                             | For more details, click here |  |
| Liechtenstein               | 28 March 2024              | Final legislation | Final legislation | Final legislation | IIR and DMTT - 1 January 2024<br>UTPR - 1 January 2025      |                              |  |
| Lithuania                   | 6 March 2024               | Intended          | Intended (Delay)  | Intended (Delay)  | QDMTT - 1 January 2025<br>IIR and UTPR - 31 December 2029   | For more details, click here |  |

#### Legend:

- 'Intended' means there is a clear expectation based on publicly available information that this measure will be enacted by the jurisdiction.
- 'Intended (Delay)' means that the jurisdiction has deferred the introduction of Pillar Two as allowed by the EU Minimum Taxation Directive whereby Member States that have a small number of headquartered groups within the scope of the rules can opt to delay their application of the rules for up to six consecutive fiscal years.
- 'No' means there is a clear expectation based on publicly available information that this measure will not be enacted by the jurisdiction within the next 3 years.
- 'Unclear' means that either the jurisdiction has not publicly commented on the measure yet, or the jurisdiction has indicated that it will consider the measure in more detail at a later date.
- "Final legislation' means a legislation approved by the relevant legislative bodies." This term includes both, legislation already enacted or legislation that awaits a procedural formality to achieve official enactment.
- 'Draft legislation' means a preliminary version of a proposed law that is still under consideration and development.

# Summary overview: Current status of Pillar Two implementation across certain jurisdictions (5/7)

| Jurisdiction or institution | Date of latest development | QDMTT             | IIR               | UTPR              | Expected date of entry into effect   | EY Global Tax Alert                 |  |
|-----------------------------|----------------------------|-------------------|-------------------|-------------------|--|-------------------------------------|--|
| Luxembourg                  | 25 March 2024              | Final legislation | Final legislation | Final legislation | Final legislation  IIR and QDMTT - 31 December 2023  UTPR - 31 December 2024 |                                     |  |
| Malaysia                    | 28 November 2023           | Final legislation | Final legislation | Unclear           | Unclear IIR and QDMTT - 1 January 2025                                       |                                     |  |
| Malta                       | 20 February 2024           | Unclear           | Intended (Delay)  | Intended (Delay)  | Intended (Delay) Unclear   |                                     |  |
| Mauritius                   | 22 July 2022               | Final legislation | Unclear           | Unclear           | Unclear  | For more details, click here        |  |
| Netherlands                 | 19 December 2023           | Final legislation | Final legislation | Final legislation | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024                  | For more details, click here        |  |
| New Zealand                 | 27 March 2024              | No                | Final legislation | Final legislation | IIR and UTPR - 1 January 2025  | For more details, click <u>here</u> |  |
| Norway                      | 12 January 2024            | Final legislation | Final legislation | Intended          | IIR and QDMTT - 31 December 2023   |                                     |  |
| OECD <sup>2</sup>           | 25 April 2024              | Yes               | Yes               | Yes               | N/A  |                                     |  |

<sup>&</sup>lt;sup>2</sup> The OECD/G20 Inclusive Framework on BEPS does not possess legislative authority. Instead, it offers guidelines and recommendations for the implementation of Pillar Two. For the purposes of the OECD line item above, "Yes" indicates that a document (such as model rules, guidance or consultation document) has been published by the OECD regarding the implementation or application of the respective rule.

#### Legend:

- 'Intended' means there is a clear expectation based on publicly available information that this measure will be enacted by the jurisdiction.
- 'Intended (Delay)' means that the jurisdiction has deferred the introduction of Pillar Two as allowed by the EU Minimum Taxation Directive whereby Member States that have a small number of headquartered groups within the scope of the rules can opt to delay their application of the rules for up to six consecutive fiscal years.
- 'No' means there is a clear expectation based on publicly available information that this measure will not be enacted by the jurisdiction within the next 3 years.
- 'Unclear' means that either the jurisdiction has not publicly commented on the measure yet, or the jurisdiction has indicated that it will consider the measure in more detail at a later date.
- "Final legislation' means a legislation approved by the relevant legislative bodies." This term includes both, legislation already enacted or legislation that awaits a procedural formality to achieve official enactment.
- 'Draft legislation' means a preliminary version of a proposed law that is still under consideration and development.

# Summary overview: Current status of Pillar Two implementation across certain jurisdictions (6/7)

| Jurisdiction or institution | Date of latest development | QDMTT             | IIR               | UTPR              | Expected date of entry into effect  | EY Global Tax Alert                 |  |
|-----------------------------|----------------------------|-------------------|-------------------|-------------------|---|-------------------------------------|--|
| Poland                      | 25 April 2024              | Draft legislation | Draft legislation | Draft legislation | 1 January 2025 (IIR and QDMTT - optionally retroactive from 1 January 2024) | For more details, click <u>here</u> |  |
| Qatar                       | 2 February 2023            | Unclear           | Unclear           | Unclear           | Unclear   | For more details, click here        |  |
| Romania                     | 19 December 2023           | Final legislation | Final legislation | Final legislation | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024                 | For more details, click here        |  |
| Singapore                   | 16 February 2024           | Intended          | Intended          | Intended          | IIR and QDMTT - 1 January 2025  |                                     |  |
| Slovakia                    | 8 December 2023            | Final legislation | Intended (Delay)  | Intended (Delay)  | QDMTT - 31 December 2023<br>IIR and UTPR - 31 December 2029                 | For more details, click here        |  |
| Slovenia                    | 13 December 2023           | Final legislation | Final legislation | Final legislation | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024                 | For more details, click here        |  |
| South Africa                | 21 February 2024           | Draft legislation | Draft legislation | Unclear           | 1 January 2024  | For more details, click here        |  |
| South Korea                 | 28 February 2024           | Unclear           | Final legislation | Final legislation | IIR - 1 January 2024<br>UTPR - 1 January 2025                               |                                     |  |

#### Legend:

- 'Intended' means there is a clear expectation based on publicly available information that this measure will be enacted by the jurisdiction.
- 'Intended (Delay)' means that the jurisdiction has deferred the introduction of Pillar Two as allowed by the EU Minimum Taxation Directive whereby Member States that have a small number of headquartered groups within the scope of the rules can opt to delay their application of the rules for up to six consecutive fiscal years.
- 'No' means there is a clear expectation based on publicly available information that this measure will not be enacted by the jurisdiction within the next 3 years.
- 'Unclear' means that either the jurisdiction has not publicly commented on the measure yet, or the jurisdiction has indicated that it will consider the measure in more detail at a later date.
- "Final legislation' means a legislation approved by the relevant legislative bodies." This term includes both, legislation already enacted or legislation that awaits a procedural formality to achieve official enactment.
- 'Draft legislation' means a preliminary version of a proposed law that is still under consideration and development.

# Summary overview: Current status of Pillar Two implementation across certain jurisdictions (7/7)

| Jurisdiction or institution | Date of latest<br>development | QDMTT             | IIR               | UTPR              | Expected date of entry into effect                          | EY Global Tax Alert                 |
|-----------------------------|-------------------------------|-------------------|-------------------|-------------------|---|-------------------------------------|
| Spain                       | 20 December 2023              | Draft legislation | Draft legislation | Draft legislation | IIR and QDMTT - 31 December 2023 UTPR - 31 December 2024    | For more details, click here        |
| Sweden                      | 19 March 2024                 | Final legislation | Final legislation | Final legislation | IIR and QDMTT - 31 December 2023 UTPR - 31 December 2024    | For more details, click <u>here</u> |
| Switzerland                 | 22 December 2023              | Final legislation | Draft legislation | Draft legislation | QDMTT - 1 January 2024<br>IIR and UTPR - 1 January 2025     | For more details, click here        |
| Taiwan                      | 30 August 2023                | Unclear           | Unclear           | Unclear           | Unclear   | For more details, click here        |
| Thailand                    | 1 March 2024                  | Intended          | Intended          | Intended          | 2025  | For more details, click <u>here</u> |
| United Arab Emirates        | 15 March 2024                 | Intended          | Intended          | Intended          | 2025  |                                     |
| United Kingdom              | 14 March 2024                 | Final legislation | Final legislation | Draft legislation | IIR and QDMTT - 31 December 2023<br>UTPR - 31 December 2024 | For more details, click here        |
| United States               | 9 March 2023                  | No                | No                | No                | N/A   | For more details, click here        |
| Vietnam                     | 29 November 2023              | Final legislation | Final legislation | Intended          | IIR and QDMTT - 1 January 2024                              | For more details, click here        |

#### Legend:

- 'Intended' means there is a clear expectation based on publicly available information that this measure will be enacted by the jurisdiction.
- 'Intended (Delay)' means that the jurisdiction has deferred the introduction of Pillar Two as allowed by the EU Minimum Taxation Directive whereby Member States that have a small number of headquartered groups within the scope of the rules can opt to delay their application of the rules for up to six consecutive fiscal years.
- 'No' means there is a clear expectation based on publicly available information that this measure will not be enacted by the jurisdiction within the next 3 years.
- 'Unclear' means that either the jurisdiction has not publicly commented on the measure yet, or the jurisdiction has indicated that it will consider the measure in more detail at a later date.
- "Final legislation' means a legislation approved by the relevant legislative bodies." This term includes both, legislation already enacted or legislation that awaits a procedural formality to achieve official enactment.
- 'Draft legislation' means a preliminary version of a proposed law that is still under consideration and development.

## Status of local global minimum tax laws passed (1/2)

This section is intended to provide a summary listing of the enactment and substantive enactment dates of the implementation of Pillar Two legislation. This section is updated on a quarterly basis.

The information provided in this section of the tracker is designed to be read independently. It is not intended to be interpreted in conjunction with other sections of this tracker.

#### Status as of 31 March 2024

|     |                | QDMTT   |                   | 1       | IR                | U       | UTPR              |  | US GAAP                        | IAS 12                                       |
|-----|----------------|---------|-------------------|---------|-------------------|---------|-------------------|--|--------------------------------|--|
| No. | Jurisdiction   | Adopted | Entry into effect | Adopted | Entry into effect | Adopted | Entry into effect | IFRS substantively<br>enacted as of<br>31 March 2024 | enacted as of<br>31 March 2024 | IFRS adapted<br>local country<br>endorsement |
| 1   | Austria        | Yes     | 31-Dec-23         | Yes     | 31-Dec-23         | Yes     | 31-Dec-24         | Yes  | Yes                            | Yes  |
| 2   | Belgium        | Yes     | 31-Dec-23         | Yes     | 31-Dec-23         | Yes     | 31-Dec-24         | Yes  | Yes                            | Yes  |
| 3   | Bulgaria       | Yes     | 31-Dec-23         | Yes     | 31-Dec-23         | Yes     | 31-Dec-24         | Yes  | Yes                            | Yes  |
| 4   | Croatia        | Yes     | 31-Dec-23         | Yes     | 31-Dec-23         | Yes     | 31-Dec-24         | Yes  | Yes                            | Yes  |
| 5   | Czech Republic | Yes     | 31-Dec-23         | Yes     | 31-Dec-23         | Yes     | 31-Dec-24         | Yes  | Yes                            | Yes  |
| 6   | Denmark        | Yes     | 31-Dec-23         | Yes     | 31-Dec-23         | Yes     | 31-Dec-24         | Yes  | Yes                            | Yes  |
| 7   | Finland        | Yes     | 31-Dec-23         | Yes     | 31-Dec-23         | Yes     | 31-Dec-24         | Yes  | Yes                            | Yes  |
| 8   | France         | Yes     | 31-Dec-23         | Yes     | 31-Dec-23         | Yes     | 31-Dec-24         | Yes  | Yes                            | Yes  |
| 9   | Germany        | Yes     | 31-Dec-23         | Yes     | 31-Dec-23         | Yes     | 31-Dec-24         | Yes  | Yes                            | Yes  |
| 10  | Hungary        | Yes     | 31-Dec-23         | Yes     | 31-Dec-23         | Yes     | 31-Dec-24         | Yes  | Yes                            | Yes  |
| 11  | Ireland        | Yes     | 31-Dec-23         | Yes     | 31-Dec-23         | Yes     | 31-Dec-24         | Yes  | Yes                            | Yes  |
| 12  | Italy          | Yes     | 31-Dec-23         | Yes     | 31-Dec-23         | Yes     | 31-Dec-24         | Yes  | Yes                            | Yes  |
| 13  | Japan          | No      | Not applicable    | Yes     | 1-Apr-24          | No      | Not applicable    | Yes  | Yes                            | Yes  |
| 14  | Liechtenstein  | Yes     | 1-Jan-24          | Yes     | 1-Jan-24          | Yes     | 1-Jan-25          | Yes  | Yes                            | Yes  |

## Status of local global minimum tax laws passed (2/2)

| No. | Jurisdiction   | QDMTT   |                   | IIR      |                   | UTPR     |                   | IFRS substantively             | US GAAP                        | IAS 12                                       |
|-----|----------------|---------|-------------------|----------|-------------------|----------|-------------------|--------------------------------|--------------------------------|--|
|     |                | Adopted | Entry into effect | Adopted  | Entry into effect | Adopted  | Entry into effect | enacted as of<br>31 March 2024 | enacted as of<br>31 March 2024 | IFRS adapted<br>local country<br>endorsement |
| 15  | Luxembourg     | Yes     | 31-Dec-23         | Yes      | 31-Dec-23         | Yes      | 31-Dec-24         | Yes                            | Yes                            | Yes  |
| 16  | Malaysia       | Yes     | 1-Jan-25          | Yes      | 1-Jan-25          | No       | Not applicable    | Yes                            | Yes                            | Yes  |
| 17  | Malta          | No      | Delayed           | No       | Delayed           | No       | Delayed           | Yes                            | Yes                            | Yes  |
| 18  | Netherlands    | Yes     | 31-Dec-23         | Yes      | 31-Dec-23         | Yes      | 31-Dec-24         | Yes                            | Yes                            | Yes  |
| 19  | New Zealand    | No      | Not applicable    | Yes      | 1-Jan-25          | Yes      | 1-Jan-25          | Yes                            | Yes                            | Yes  |
| 20  | Norway         | Yes     | 31-Dec-23         | Yes      | 31-Dec-23         | No       | Not applicable    | Yes                            | Yes                            | No   |
| 21  | Romania        | Yes     | 31-Dec-23         | Yes      | 31-Dec-23         | Yes      | 31-Dec-24         | Yes                            | Yes                            | Yes  |
| 22  | Slovakia       | Yes     | 31-Dec-23         | Deferred | 31-Dec-29         | Deferred | 31-Dec-29         | Yes                            | Yes                            | Yes  |
| 23  | Slovenia       | Yes     | 31-Dec-23         | Yes      | 31-Dec-23         | Yes      | 31-Dec-24         | Yes                            | Yes                            | Yes  |
| 24  | South Korea    | No      | Not applicable    | Yes      | 1-Jan-24          | Yes      | 1-Jan-25          | Yes                            | Yes                            | Yes  |
| 25  | Sweden         | Yes     | 31-Dec-23         | Yes      | 31-Dec-23         | Yes      | 31-Dec-24         | Yes                            | Yes                            | Yes  |
| 26  | Switzerland    | Yes     | 1-Jan-24          | No       | Not applicable    | No       | Not applicable    | Yes                            | Yes                            | Yes  |
| 27  | United Kingdom | Yes     | 31-Dec-23         | Yes      | 31-Dec-23         | No       | Not applicable    | Yes                            | Yes                            | Yes  |
| 28  | Vietnam        | Yes     | 1-Jan-24          | Yes      | 1-Jan-24          | No       | Not applicable    | Yes                            | Yes                            | No   |

IFRS substantively enacted: Legislation is substantively enacted when any future steps in the enactment process will not change the outcome.

US GAAP enacted: Legislation is considered enacted when any further procedures in respect to the particular legislation being passed at the time are unable to change the outcome.

IFRS adapted local country endorsement: Whether the jurisdiction has endorsed the amendments to IAS 12 (Income Taxes) by the International Accounting Standard Board for IFRS adapted version.

### Jurisdiction reactions on Pillar Two



### Jurisdiction reactions on Pillar Two Continued...



### Jurisdiction reactions on Pillar Two Continued...



### Jurisdiction reactions on Pillar Two Continued...



### Global contacts



Barbara Angus EY Global Tax Policy Leader barbara.angus@ey.com



Jose A Bustos
BEPS Desk Leader
Ernst & Young LLP (EY US)
joseantonio.bustos@ey.com



Roberto Aviles Gutierrez
BEPS Desk
Ernst & Young LLP (EY US)
roberto.aviles.gutierrez1@ey.com

#### EY | Building a better working world

EY exists to build a better working world, helping to create long-term value for clients, people and society and build trust in the capital markets.

Enabled by data and technology, diverse EY teams in over 150 countries provide trust through assurance and help clients grow, transform and operate.

Working across assurance, consulting, law, strategy, tax and transactions, EY teams ask better questions to find new answers for the complex issues facing our world today.

EY refers to the global organization, and may refer to one or more, of the member firms of Ernst & Young Global Limited, each of which is a separate legal entity. Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients. Information about how EY collects and uses personal data and a description of the rights individuals have under data protection legislation are available via ey.com/privacy. EY member firms do not practice law where prohibited by local laws. For more information about our organization, please visit ey.com.

© 2024 EYGM Limited. All Rights Reserved.

EYG no. 004466-24Gbl

CRS\_CP\_92058622

**ED None** 

This material has been prepared for general informational purposes only and is not intended to be relied upon as accounting, tax, legal or other professional advice. Please refer to your advisors for specific advice.

ey.com