

# BEPS Pillar II Impact Assessment & Country-by-country reporting services

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## Why Choose Us?

- ✓ **Expertise in Global Tax Compliance:** Our team has deep expertise in managing the complexities of BEPS Pillar II provisions and Country-by-Country Reporting requirements, ensuring compliance with evolving international tax regulations
- ✓ **Tailored Solutions for Your Business:** We provide customised advice and strategies based on specific structures and operations, enabling optimisation
- ✓ **Up-to-Date Knowledge of Regulatory Changes:** We stay on top of the latest changes offering actionable insights
- ✓ **Transparent Reporting and Communication:** We maintain clear communication and provide transparent reporting, helping with the understanding of any implications of compliance



## Our BEPS Pillar II and Country-by-Country reporting (“CbCR”) services

Our services help your business navigate the complexities of global tax compliance, minimise risk, and ensure alignment with tax requirements

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### Qualitative Impact Assessment

Conduct a technical analysis on the application of the GloBE Rules, in line with the OECD Model Rules. The analysis will address the following areas:

- A comprehensive overview of the GloBE Rules, including relevant commentary and guidance, along with an examination of the GloBE Rules’ scope, particularly in determining the MNE Group
- Identification of key entities within the Group, such as Constituent Entities, Ultimate Parent Entity, Intermediate Parent Entities, Partially Owned Parent Entities, and Joint Ventures
- Overview of the GloBE calculation methodology, covering the substance-based income exclusion, as well as an initial review of the safe harbour rules
- Explanation of the various mechanisms through which taxes arising under the GloBE Rules are paid

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### Deep dive on transitional CbCR safe harbours

Conduct a thorough analysis of the application of the transitional CbCR safe harbours, including:

- Comparison between the CbCR Group and the MNE Group identified above
- Identification of any discrepancies between the current CbC process and the requirements for preparing a qualified CbCR
- Recommendations on addressing these gaps, including a high-level roadmap outlining the steps to achieve this
- A workshop to discuss the information required for safe harbour calculations, with the calculations to be carried out once the required details are received
- Upon completion of the review, a summary will be provided highlighting which jurisdictions may benefit from the transitional CbCR safe harbours and whether the current CbCR meets the safe harbour requirements. Initial recommendations for potential adjustments to the CbCR, based on OECD Model Rules guidance, will also be included for future reporting.

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### Initial quantitative impact assessment

- Estimation of the potential top-up tax through a modelling exercise for jurisdictions where safe harbour rules are not likely to apply
- Evaluation of certain adjustments tax could significantly impact the Pillar II GloBe calculation of estimated top-up tax including dividends and capital gains (from the disposal of subsidiaries and associates) as well as substance-based income exclusion

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### Recommendations and roadmap

- Overview of the jurisdictions where compliance requirements are likely to arise due to the implementation of GloBE Rules