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OECD Pillar Two Clarifies Deferred Tax Liability, Other Scenarios

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Tax Partner Charlotte Sallabank and Associate Christy Wilson authored a *Bloomberg Tax* article discussing the three documents published by the Organisation for Economic Co-operation and Development (OECD) in May and June that clarify the interpretation of Global Anti-Base Erosion Model Rules in certain areas. The authors explain that the documents, which include the fourth set of administrative guidance on the global anti-base erosion model rules; additional guidance on country-by-country reporting implementation; and a question-and-answer document on qualified status under the global minimum tax aim to clarify Pillar Two application and provide guidance to jurisdictions when implementing Pillar Two in domestic legislation to promote consistency amongst those jurisdictions.

In the article, Charlotte and Christy delve into each document's topic and why it matters, such as the administrative guidance's coverage of deferred tax liability recapture and the treatment of securitization vehicles, as well as country-by-country reporting requirements and the Pillar Two framework's reliance on the recognition of the qualified status of jurisdictions' domestic rules.

"OECD Pillar Two Clarifies Deferred Tax Liability, Other Scenarios," *Bloomberg Tax*, July 1, 2024

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